



Freeman¹

Code of Conduct

Our Blue
Protect Our House

At Freeman, we know our superpower is our people.

They shaped the past and guide us to the future. They are integral to our continued success because of how our customers and our communities perceive and experience us.

That's why we want everyone who works with us to understand our commitment to operating with unquestioned integrity and the highest standards of ethical conduct.

We cannot overstate this enough. We fundamentally believe it is our shared responsibility to maintain an ethical, respectful, and professional environment. This means all of us holding ourselves to the highest standards of conduct in how we treat one another and work together to deliver exceptional service and value. In short, by protecting our True Blue House, we ensure our shared success.



This Code helps you understand our shared commitments. It includes topics to help ensure we are compliant with laws, regulations, and policies; and importantly, how to make good decisions and raise a concern. We all play a crucial role in this.

Our culture of ethics, compliance, and doing business the right way remains the foundation of how we deliver connecting people in meaningful ways. **We are so proud of the legacy we have created together.**

**Thank you for your partnership
and commitment to always
doing the right thing and living
our values.**

Sincerely,



Carrie Carrie Freeman-Parsons,
Chair of the Board



BPH Bob Priest Heck,
CEO



Janet Janet Dell,
President

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True Blue House

Our True Blue House helps you and our customers understand why we're here. It describes what inspires us and defines our culture. It identifies the values that are important to us.



Purpose

Connecting people in meaningful ways

Vision

Redefining live for a new era

Business objectives

Performance excellence

Profitable growth

Uncompromising service and safety

Environmental sustainability

Culture

Collaborative culture of diverse people, perspectives, and ideas

Values

Integrity

Enthusiasm

Empathy

Learning mindset

Innovation

Why do we have a Code?

Short answer: to outline our shared ethical standards for conducting business throughout the world. A little longer explanation is that it can also serve as a guide when you have questions or face dilemmas where the right choice is not always so clear.

The Code is grounded in our core values which serve as the foundation that supports our business activity, along with our individual actions and decisions as Freeman employees. It also summarizes key compliance policies, highlighting issues that can have significant legal and ethical consequences if handled improperly and providing guidelines for appropriate action.

Who must follow the Code?

All Freeman employees worldwide, regardless of location, role, or level of seniority. Our Code of Conduct also applies to all employees of Freeman affiliated companies. We also expect temporary and contract employees, consultants, agents and any other third party who acts on behalf of Freeman to follow the principles of the Code.

What does the Code require from me?

We are each accountable for following our Code and exercising good judgment consistent with it. We are also responsible for reporting Code violations that we learn about or experience. Employees who fail to comply with our Code—including those who fail to report Code violations—may face disciplinary action, up to and including termination.

What does the Code require from people leaders?

Freeman expects a lot from its leaders. They set the tone for their teams and are often the first place employees turn with questions. As a result, they are expected to:

- Set a strong example of ethical conduct.
- Provide training, education, and resources to support employees in complying with the Code and underlying policies.
- Encourage employees to speak up if they have questions or concerns.
- Watch for and appropriately address misconduct in their teams.
- Report instances of policy violation and misconduct to the Human Resources and/or Legal & Compliance Departments.



Our Commitments

We all must obey applicable laws, rules, and regulations of the countries in which we operate. Also, we must follow our company policies. To help provide clarity, this Code sets out below the seven most important commitments to doing business the right way:

Be Good

& Do the Right Thing

Be Fair

& Respectful

Be Safe

& Hold Each Other Accountable for Safety

Be Ethical

& Fair in Business Dealings

Be Loyal

& Trustworthy

Be Honest

& Accurate

Be Dedicated

to Social & Environmental Responsibility

Be Good & Do the Right Thing

Do Business Ethically

Acting ethically means more than just following the law. Freeman people are expected to meet a higher standard, even if the situation is complex or there is no specific policy to follow. We are all expected to use our best judgment to make good decisions every day. When in doubt, seek help.

Meet High Standards

All Freeman people are held to the same high standards. If the Code sets a higher standard than the law, we are expected to follow the Code.

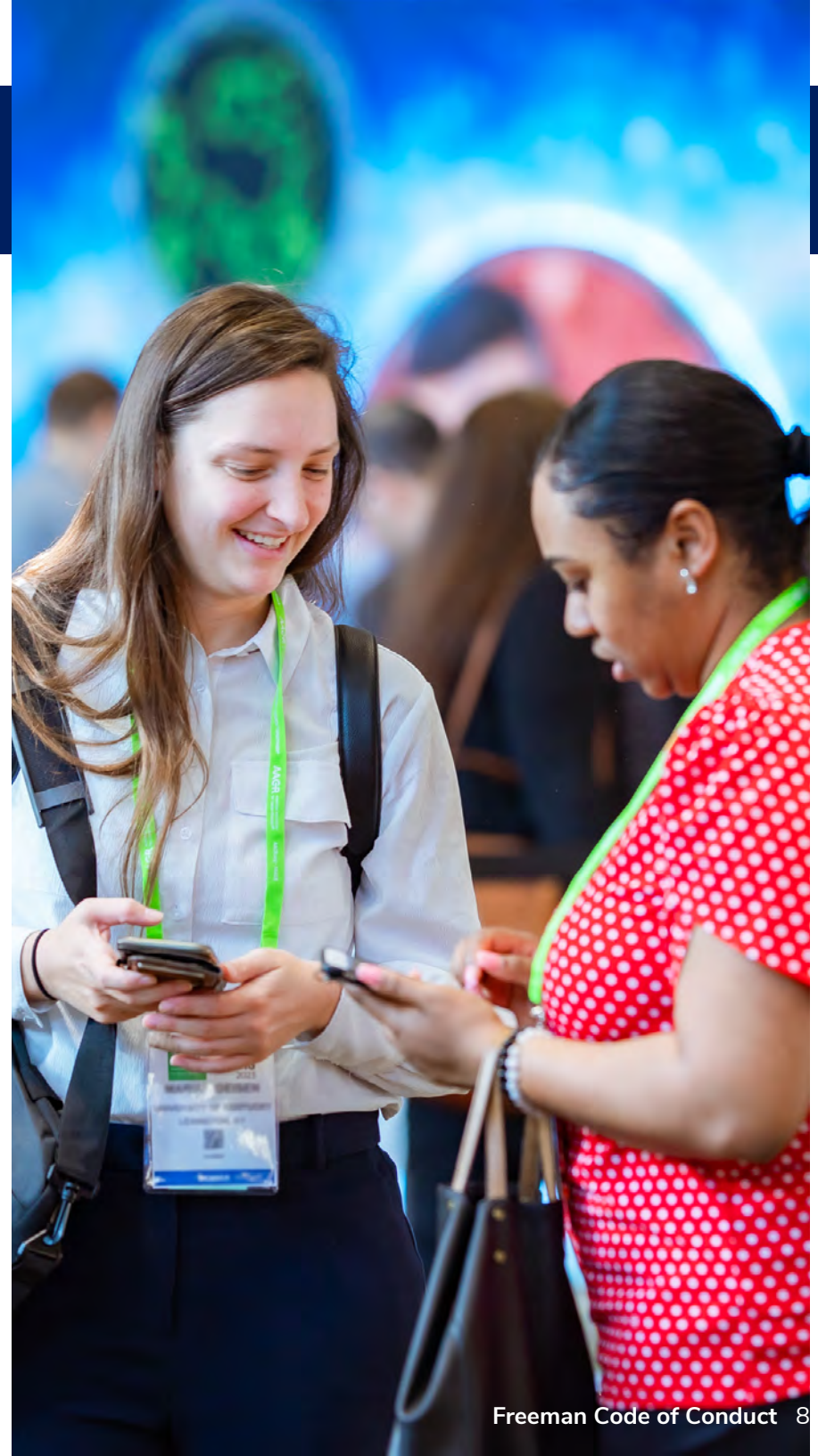
Obey the Law

Obeying the law is the foundation on which our reputation and commitments are built. As a global company privileged to do business throughout the world, we have the responsibility to comply with all the laws that apply to our business. If you have any concerns about whether something is legal, contact the Legal & Compliance Department for guidance.

Demonstrate High-Integrity Leadership

Freeman's success depends on each of us doing the right thing. No matter our job title, we are all leaders when it comes to ethics and integrity, and we must meet these important commitments:

- Know and follow the guidance set forth in our Code.
- Foster a positive, inclusive work environment and a strong culture of ethics. Complete compliance courses and certifications on time.
- Report suspected violations of the law or our Code.
- Do not engage in workplace retaliation.
- Report any known or suspected retaliation.
- Cooperate with investigations.



Be Fair & Respectful



Strength in Diversity

Freeman embraces the variety of backgrounds and life experiences our employees bring to work. As colleagues, we offer the perspectives of different genders, languages, local customs, physical abilities, races, religions, sexual orientations, gender identities, life experiences and socio-economic statuses. We also vary in our personal styles of thinking, expressing ourselves and problem-solving.

To be successful as a global company, each of us should demonstrate respect for those who are different from us. This includes recognizing that our own way of thinking is not the only way, and that when diverse backgrounds lead to diverse viewpoints, this is not a weakness. It is the exact opposite. Our differences make us stronger and better able to serve the needs of our company and our customers.

We provide equal opportunities in employment to all employees without regard to personal characteristics, such as race, ethnicity, color, gender, age, disability, sexual orientation, gender identity, or other characteristics protected by law. Illegal discrimination and retaliation against anyone for either sharing a concern or participating in an investigation have no place at Freeman.

Harassment and Disrespectful Behavior

Freeman is committed to providing a work environment free of all forms of discrimination and harassment. Harassment is unwelcome conduct based on a protected characteristic that creates an intimidating, hostile, or offensive work environment, causes work performance to suffer, or negatively affects job performance.

Our actions and the way we treat one another are key to creating a productive and inclusive workplace. We must always treat each other fairly and respectfully, never engaging in harassment or other unprofessional behavior. In addition, we do not tolerate bullying at Freeman. This includes both threats and acts of violence, as well as intimidation, use of abusive language, threatening conduct, and attempts to instill fear in others.

If you think you have experienced or witnessed discrimination, harassment, or bullying, speak up. You can voice your concern to your people leader, or any other resource listed in our Code, including our HeyBlue Hotline, where you can raise a concern anonymously. Freeman does not tolerate or permit retaliation for asking a question, making a report, or participating in an investigation.

For more detailed information, see our following policies and resources:
[Non-Discrimination, Anti-Harassment & Retaliation Policy](#)
[IDEA : Diversity & Inclusion at Freeman](#)

Be Safe & Hold Each Other Accountable for Safety

Ensuring everyone returns home safely from work every day is core to our operations. We believe all jobs can be done safely, and that zero injuries and fatalities are possible. This requires an unwavering commitment from all of us. We comply with all health and safety laws in addition to our own strict programs and safety requirements.

Safety First

We ardently adhere to Freeman's Three Obligations of Safety Program:

1. Refuse to do anything you consider unsafe. 2. Stop anyone being unsafe; and 3. Listen if informed you are being unsafe. In addition to safety training for all our employees we all make a pledge:

- To lead by example through my actions and words
- To know, follow, and communicate the three obligations of safety
- To participate in the safety of Freeman employees, clients and partners
- To acknowledge and resolve safety concerns rather than ignore them

1

Refuse to do anything you consider unsafe

2

Stop anyone being unsafe

3

Listen if informed you are being unsafe





Be Ethical & Fair in Business Dealings

There can be a complex backdrop of laws, regulations, and policies, but the general rules here are obvious and simple. We don't bribe. We don't lie. We don't deceive. We don't hide information from government entities or falsify documents. We will not offer anything of value to a government official to obtain an improper business advantage. We will also maintain the highest level of integrity when advocating on behalf of the company via lobbying, or otherwise engaging with governmental entities. The same is expected from our vendors or service providers who interact with government officials on our behalf.

We compete hard—but also fairly and equitably within the law. This means that we won't spy on our competitors or use their confidential information and we expect our competitors to treat us the same. We won't engage in business practices or exchange information with our customers or competitors that reduces or limits competition. We implement fair and equitable pricing for our customers, and we follow the law when competing for our customers' business. We won't interfere with free markets, but instead we allow competition to take its course for the benefit of our clients and customers.

Business Gifts & Entertainment

Used correctly, gifts and entertainment can promote goodwill and reinforce strong business relationships. In some cultures, gifts may be customary and expected. However, because gifts and entertainment carry value for the recipient, it's important to consider them carefully and avoid situations in which they might diminish – or appear to diminish – your objectivity or someone else's.

It is critical that you familiarize yourself with a variety of important policies and resources to ensure you are playing by the rules and conducting business legally, fairly, and ethically. Of course, should you have any questions, you may contact the Legal & Compliance Department.

For more detail, please see our: [Anti-Bribery Policy](#), [Anti-Money Laundering Policy](#), [Anti-Trust and Competition Policy](#), [Trade Compliance Policy](#), [Travel and Expense Reimbursement Policy](#), [Supplier Code of Conduct](#)

Be Loyal & Trustworthy

Protect and Respect Private and Proprietary Information

Many of us have access to confidential, sensitive, private, or other nonpublic information through our work and it is our obligation to safeguard it. At Freeman we protect our employees', customers', and business partners' confidential and personal information we may have access to as part of our business relationship. We also protect our own confidential information. That means we will not share this information with our family, friends, colleagues, or anyone who is not authorized to receive such information for business purposes – and this obligation continues even after we leave Freeman.

We also understand and respect the importance of intellectual property rights (including trademarks, patents, and trade secrets) both for our company and for others. So, we protect the intellectual property rights of the company and we do not knowingly violate the valid intellectual property rights of others.

Conflicts of Interest

Conflicts of interest are situations in which your personal interests or relationships influence—or could reasonably appear to influence—decisions you make on Freeman's behalf. Conflicts of interest can harm Freeman's reputation and business success.

Each of us has a responsibility to make decisions that are in the best interest of Freeman. Disclosure is needed for those personal interests and activities that create potential conflicts of interest. When you disclose a potential conflict of interest to your people leader, you protect yourself and Freeman.

If you think you have an actual or potential conflict of interest, disclose it immediately. Disclosing conflicts of interest as soon as possible helps us maintain our culture of integrity.

Protecting Freeman's Property, Resources, and Information

We all are responsible for safeguarding company property and resources made available to us in the course of our jobs. Our property and resources include both our physical assets, such as our facilities, materials, and equipment, as well as our communication systems, such as our computers, software, internet service, telephones, and email.

Use facilities, materials, equipment, and other physical assets, including corporate credit cards, only for authorized purposes that are related to your job responsibilities. Never take part in any action that involves fraud, theft, misappropriation, embezzlement, or similar illegal activities. Freeman takes these and other crimes seriously and will pursue prosecutions vigorously. Use email, internet, phone, and other Freeman communication systems for business purposes—keep personal use to a minimum. Never use our systems in ways that could be perceived as illegal, harassing, or offensive, or that could reflect poorly on Freeman. This applies any time you use Freeman equipment, both during and outside of working hours and while at work or at a remote location. When you communicate about Freeman or matters that directly affect Freeman — whether through texting, email, instant messaging, social networking, or the internet — always follow our Core Values and all company policies.

For detailed additional guidance, please see our: [Conflict of Interest Policy](#), [Information Security Policy](#), [Privacy and Data Protection Policy](#), and [Social Media Policy](#).



Be Honest & Accurate

Accurate Books and Records

As part of our work for Freeman, many of us create business and financial records. Some examples include purchase orders, contracts, expense reports, invoices, government-required financial disclosures, other financial statements, regulatory reports to government entities — even routine things like emails and timesheets. These records are important to our company's business decisions and operations, and we all have a responsibility to ensure they are accurate, up to date, truthful, and complete.

Make sure you follow all laws, regulations, and company policies, standards, and procedures when creating business and financial records, seeking guidance when needed. Keeping accurate records is not just about creating documents — it is also about managing them. We must know and follow Freeman's internal controls and policies about records management, including maintaining, retaining, and correctly disposing of records. If you are asked for records or information as part of an audit or an investigation conducted by Freeman or its external auditors, you have a responsibility to be transparent and provide full and complete information.

Doing so helps Freeman complete the audit or investigation quickly, and it demonstrates our culture of compliance and ethics.

Be Dedicated to Social & Environmental Responsibility

We believe strongly in our responsibility to create a meaningful, lasting, and positive impact for people and our planet. We are committed to sustainability and to a goal of Zero Waste. As the world's leading events company, we are focused on reducing our footprint by eliminating waste throughout our business practices. We are continually reassessing how we use materials, time, talent, and space as a business issue, and focusing our energy on creating a business model that will last us for another 100 years and beyond.

Freeman aligns its environmental and DEI programs and initiatives with the Sustainable Development Goals (UNSDGs) the United Nations adopted in late 2015. The interconnected social, economic, and environmental goals seek to overcome the challenges to global sustainable development.

We respect human rights and work with stakeholders to support global efforts to protect them. In line with externally recognized frameworks such as the UN Guiding Principles, our commitment on Human Rights includes:

- Providing safe and healthy working conditions to all our employees.
- Working to eradicate child labor and any form of forced labor and modern slavery within our operations and supply chains, anywhere in the world.
- Following all employment laws and regulations, including rules about the employment of minors, and supporting equal rights and the elimination of discrimination in employment.
- Maintaining our employees' rights to freedom of association and collective bargaining.
- Engaging in equitable hiring practices and providing competitive, fair, and equitable pay.
- Providing transparent, fair, and confidential procedures for employees to raise relevant concerns.



For more information, please see our [Sustainability Policy and Human Rights Policy](#)

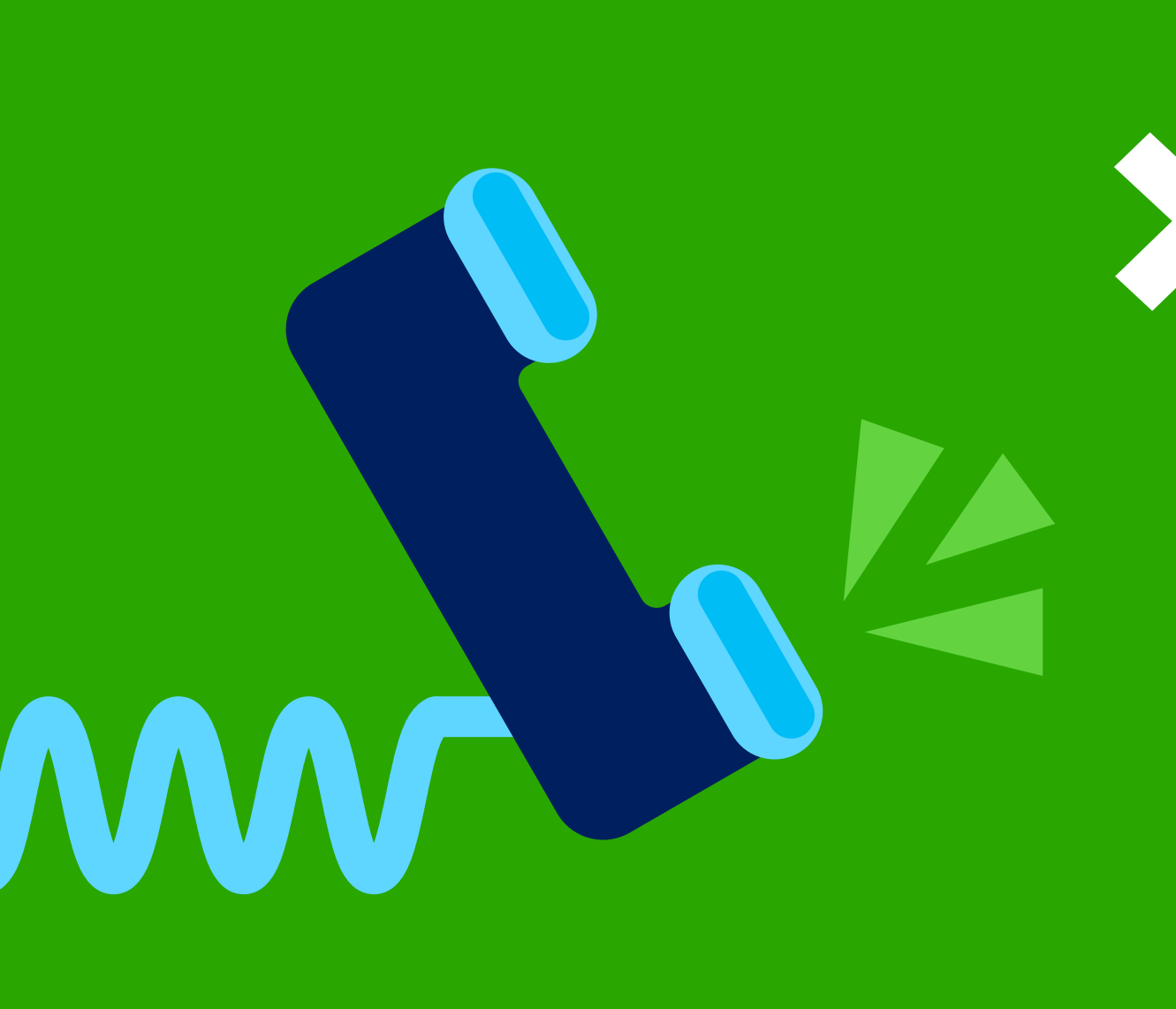


A Guide to Making Good Decisions

The Code can provide practical guidance for many situations. But no single document can anticipate every situation or outline every requirement. Most importantly, our Code is never a substitute for common sense and good judgment.

If you don't find the answer you need in the Code, or our accompanying policies, stop and think about your proposed course of action. Discuss it with your people leader or a colleague or contact the [HeyBlue Hotline](#).





Remember to Speak Up

If you find yourself in a situation where the right course of action is not clear, remember that you are not alone. Freeman provides multiple resources for advice and help when you need it. By asking questions and reporting potential problems, you are protecting our True Blue House and helping us all succeed.

If you see or know of any misconduct, you have an obligation to report the issue. To make a report, you can contact any of the following resources:

- Your People Leader
- Your assigned Human Resources Business Partner
- Freeman's Legal & Compliance Department
- Freeman's Compliance Officer
- HeyBlue Hotline

People Leaders have different reporting responsibilities. If you are a People Leader, you are expected to report all suspected violations of the law or the Code to the Legal & Compliance Department or your Human Resources Business Partner.

**Hey
Blue**
Hotline

U.S. and Canada [1-855-342-6939](tel:1-855-342-6939)
Mexico [01-800-253-0373](tel:01-800-253-0373)
United Kingdom [0808-234-6721](tel:0808-234-6721)

For all other countries, or for web access, please report your concerns by clicking or scanning the QR code

Click or Scan

