



Anti- Corruption module

Code of Conduct



Otto Krahn
Group

We strive to maintain the highest ethical standards in all of our business activities.



Consistent compliance with all applicable laws in all of our business activities at every location is a matter of course for us. Our competitive efforts are based exclusively upon objective criteria such as quality and price. As such, we do not tolerate corrupt or otherwise unlawful conduct under any circumstances.

The following guidelines describe the conduct we expect of employees when working for the Otto Krahn Group; they are intended to help employees identify corrupt conduct.

In particular, these guidelines are intended to prevent corrupt conduct.

Regardless of what is considered “commonplace” in certain countries or regions, all Otto Krahn Group employees are expected to comply with these guidelines based on applicable laws in their respective locations. All employees who are subject to stricter laws as a result of their nationality or location are obliged to comply with those.

What is corruption?

We define corruption as any form of impropriety in which the powers of a public office, agency or business position are used to influence business or government decisions through favors or special considerations.

The same applies to favors or special considerations offered to close relatives or friends of the person whose business or governmental decisions could potentially be influenced.

How should we behave?

Basic principles

We do not tolerate corrupt behavior in any form. This applies in all countries in which the Otto Krahn Group operates, even if corruption as defined under these guidelines is considered “normal” or “generally accepted” in a certain country or region.

The Otto Krahn Group will enforce all necessary and appropriate measures under criminal and labor law in response to participation in, or toleration of, bribery or other forms of corruption.

Please note that any conduct that merely creates the impression of corruption must also be avoided. All employees are thus forbidden from making any business decisions that could create such an impression. When in doubt, employees

are expected to seek out clarifying information and consult the responsible persons listed below.

We regularly monitor whether and where a lack of supervision or other weaknesses within a group could encourage corrupt behavior. Upon identifying such cases, we take appropriate remedial action. All employees and managers are expected to help prevent corruption within Otto Krahn Group’s business environment through strict compliance with this policy, and by helping uncover such behaviors if they occur.

Behavior toward customers and suppliers

We take care to select our suppliers according to the principles of fair competition, and we do not attempt to influence our customers’ purchasing decisions through corrupt or otherwise unfair conduct.

We select our suppliers based on price, quality and suitability. Any attempts by suppliers to influence the decision-making process by offering or promising personal benefits must be rejected without exception. We do not show unjustified bias for or against individual suppliers when tendering for contracts.

Our goal is to win customers over through high-quality products and services, customer-friendliness, and a good price-performance ratio. We refuse to influence customers’ buying decisions by offering or promising personal benefits.



Example:

A supplier contacts an Otto Krahn Group employee responsible for procurement and offers to pay the employee 1% of the order volume in exchange for the employee giving the supplier special consideration in his purchasing decisions. Such an offer is considered an illegal bribery attempt. The Otto Krahn Group employee rejects the offer and notifies his supervisor and the internal department responsible.

Gifts and hospitality in the context of business relationships

We recognize that small gifts and hospitality are part of business life, as are business lunches and dinners. However, employees must always bear in mind that such gifts may only be offered and accepted to an appropriate extent within the framework of social customs, and that they must never be offered or accepted for unfair reasons. In other words, there must never be a risk of such gifts or hospitality influencing or appearing to influence business decisions. Furthermore, such gifts and hospitality must never be given or received at home – gifts may only be sent to or received at the recipient's business address.

If employees of the Otto Krahn Group are aware that their business partner is forbidden from accepting gifts in general or those of the envisaged type due to legal restrictions or internal company guidelines, they must not make any such offers.

Example:

An Otto Krahn Group employee wants to give a customer's employee a coffee table book for his birthday. She learns that the customer is subject to a policy that prohibits employees from accepting gifts of any kind. Therefore she refrains from giving him the picture book and instead only sends him a card.

Our employees are also generally prohibited from accepting monetary or comparable gifts (e.g. vouchers) from business partners, regardless of their value. Similarly, they must never give, offer, or promise such gifts to our business partners. Our employees are not permitted to request gifts, invitations to meals or events, other forms of hospitality, personal services or favors for themselves or others from our business partners.

Whether gifts or other forms of hospitality comply with social customs depends on whether the gift itself is customary in business, what the reason for the gift is, and how often the gift is given.

As such, one-off non-monetary gifts such as small promotional items are often considered acceptable, provided that the principles set out in this policy are observed. Gifts that go beyond this or that are offered several times within a financial year must always be reported to the Otto Krahn Group management, and may only be accepted with their consent.

Example:

A supplier sends a phone charger to an employee of the Otto Krahn Group, and then sends a soccer ball later that same year. Both are promotional giveaways. The employee may only accept the second gift if the management of the relevant division considers it appropriate.

Invitations to meals or other events may be extended or accepted in accordance with social practice, provided that the above requirements are met, the invitation has a legitimate business purpose, and the invitation is extended as part of normal business dealings (e.g., lunch during an all-day meeting or seminar, meals after an event, dinner at multi-day events, etc.). Any invitations above and beyond this require management approval.

Example:

After long negotiations at the customer's place of business, the customer invites the Otto Krahn Group employee to dinner at a restaurant. The employee is permitted to accept the invitation.

Otto Krahn Group employees may not participate in events or trips paid for by third parties without prior management approval. Otto Krahn Group management will only grant this approval if there is no risk that the event will influence business decisions.

When in doubt, employees are obliged to consult their superiors, the Head of Legal, or the CFO of the Otto Krahn Group.

Example:

A supplier invites a manager of the Otto Krahn Group to tour his production facility. The supplier offers to pay for the manager's flight, accommodation, and meals. The employee may only take the trip if the management of the relevant division considers it appropriate.

Gifts and hospitality for political officials

Without exception, offers of cash, non-monetary gifts, or other forms of hospitality must never be extended to or accepted from public officials or persons in similar positions, whether at home or abroad. This applies even if the gifts are very low in value or would be acceptable to offer employees of a private company.

Public officials and persons in similar functions include, in particular, persons appointed to a public office or performing public administrative tasks on behalf of a government body. When in doubt, employees should contact the responsible persons listed below.

Commissions/brokerage fees

Fees for brokers and similar service providers may raise suspicions of attempts to conceal corrupt conduct. As such, brokerage contracts may only be concluded with prior management approval.

Before entering into such a business relationship, employees must have sufficient knowledge of the reputation and the quality of the broker. Irregularities that give rise to concerns (e.g. registered company location, designations, previous business integrity) must be investigated and clarified.

Example:

An employee is considering hiring a broker based in Liechtenstein. The employee must conduct further investigations into this broker. The services to be provided by the broker and/or its area of responsibility must be defined in writing and contractually agreed.

Any services provided by the broker in context of the business relationship must be documented precisely. Moreover, employees must ensure (e.g. through contractual stipulations and corresponding monitoring) that brokers do not use money received from the Otto Krahn Group for corrupt purposes.

Prevention of money laundering

The Otto Krahn Group takes appropriate measures to prevent money illegally earned by third parties from being funneled into legal trade in connection with our business activities ("money laundering"). We always

comply with all applicable anti-money laundering regulations and support all efforts by our business partners in this regard.

Whom do I contact?

These corruption prevention guidelines are intended to support employees in their day-to-day work. Nevertheless, situations may arise in which employees are uncertain as to the proper course of action. In such cases, employees can and must contact their direct

manager, the Tax & Legal Director, or the CFO of the Otto Krahn Group. Employees are also welcome to seek those people out at any time regarding general questions related to corruption prevention.

In the event of concrete and justified indications of a violation of one of the aforementioned principles, employees are obliged to notify their supervisor, the Head of Legal, and/or the CFO of the Otto Krahn Group. This information will be treated confidentially in accordance with the applicable legal provisions.

Employees who are guilty of corruption and/or have committed criminal offenses must expect criminal consequences. The Otto Krahn Group will also take the necessary measures at labor law level; in the case of corruption, this usually means the immediate termination of the employment relationship.

If you so desire, we will treat the information you provide as confidential to the extent permitted by law. You can also submit all reports via our anonymous whistleblower system (<https://otto-krahn-gruppe.integrityline.app>), which can also be accessed through our websites.

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