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MUEGGE GROUP

Anti-Corruption Policy



1 Introduction

Dear reader,

MUEGGE GmbH and its subsidiaries (“MUEGGE Group”) take their responsibilities and obligations under current anti-corruption laws very seriously. Corruption fuels poverty, hunger, disease and crime and stops societies and individuals from realising their full potential. Corruption impedes economic and social development. It undermines the principles of the rule of law and fair market practices to which MUEGGE Group and other “good corporate citizens” are committed.

Corruption is prohibited worldwide and can result in serious consequences for both the individuals (prison sentences, fines) and the companies (heavy fines, exclusion from public tenders, etc.) involved. Police investigations into alleged corruption are often covered by the media, which can lead to serious reputational damage, even if the allegations ultimately turn out to be unfounded.

To prevent these negative outcomes, it is extremely important to avoid even the mere suggestion of corrupt behaviour. And this is also what MUEGGE Group expects from its management, employees and contractual partners. The simplest way to avoid corruption is to be transparent about your actions and to use common sense.

To help you do this, this Anti-Corruption Policy defines improper conduct and clarifies, for example, the circumstances in which you must seek prior approval for charitable donations.

Any MUEGGE Group management staff member or employee who engages in activities that are prohibited under applicable anti-corruption laws

will face severe disciplinary measures, up to and including termination of their employment.

If you become aware of any violations of this Policy, you must report them immediately to your line manager or to someone in COMPLIANCE.

You, every other employee of MUEGGE Group and third parties may also report any actual or suspected misconduct involving MUEGGE Group anonymously via MUEGGE Group's whistle-blower system. MUEGGE Group's whistle-blower system can be found here: www.muegge.de/whistleblower

Since reports submitted internally are of particular importance in identifying misconduct and taking the necessary steps to rectify it, a report made to the best of one's knowledge and belief may never result in any disadvantage for the person submitting it.

Any information will be taken very seriously and followed up by MUEGGE Group's COMPLIANCE department, which will provide feedback to the whistle-blower within three months at the latest.

Reichelsheim, February 2023

Dr. Klaus Martin Baumgaertner
CEO

Nicole Steppat
Chief Compliance Officer



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2 Background

MUEGGE Group has adopted this Anti-Corruption Policy as a sub-policy of MUEGGE Group's Code of Conduct. The Anti-Corruption Policy applies to all affiliates of MUEGGE Group worldwide. It contains mandatory rules regarding personal advantages granted to or offered by third parties (i.e. who are not employed by MUEGGE Group).

Where applicable local laws, regulations or practices are stricter than the provisions of this Anti-Corruption Policy, the stricter provisions shall take precedence over this Policy. If you are not sure whether local laws, regulations and practices are stricter, please contact someone in COMPLIANCE. Any contravention or attempt to contravene the provisions of this Policy is prohibited.

What is corruption?

In the broadest sense, corruption means

- *Granting a personal advantage to a manager or representative/employee working for a business partner in order to influence that person to favour the person granting the personal advantage in respect of his or her duties to his or her employer/authority.*

A "personal benefit" can be anything of value to the person who receives it. This can involve money, but also "customary" courtesies such as gifts and hospitality, if such benefits are, for example, expensive or inappropriate.

Considering that MUEGGE Group operates in many different countries with very diverse commercial backgrounds, there are no generally applicable standards for what constitutes permissible personal benefits. However, there are criteria that can help avoid the suggestion of corrupt behaviour.

Below you will find what are referred to as the "red traffic light" criteria. They describe situations and circumstances that must be avoided at all costs. You will find what are referred to as the "Amber traffic light" criteria, which always require prior approval by COMPLIANCE. Please keep in mind that reality is not always black or white. For this reason, the criteria listed should also be understood as guidelines, and we expect you to assess situations independently and not to accept any deliberate or careless sidestepping of the provisions of this Policy.

Particular care should be taken when dealing with office holders. Global anti-corruption laws are very strict about granting personal advantages to office holders. In general, it is better not to grant personal advantages to office holders at all in order to avoid the risk of corruption. For this reason, granting or promising personal advantages to office holders without prior approval from COMPLIANCE is strictly prohibited.

What is a "public official"?

A public official is a person who performs a public service. This is not limited to public officials, but can also include representatives of privatised or state-owned companies that manage public sector affairs (e.g. water or waste management).

In addition, in some countries, representatives of utilities or state-owned companies operating in the oil and gas industries may also be considered public officials under local law. Please note: Since the term "office



holder” is very broad, special care is required. In many cases, the representatives of business partners may also be office holders. If you are in any doubt about this, please always consult a Compliance staff member before granting any personal advantages.

3 Granting and accepting personal advantages

Irrespective of whether managers, employees or deputies of MUEGGE Group receive personal advantages,

- Granting/promising personal advantages to third parties or
- these are offered or granted by third parties or they ask a third party to do so, the criteria defined below must always be taken into account.

PERMISSIBLE PERSONAL DONATIONS	WORK REQUIRING APPROVAL	IMPERMISSIBLE PERSONAL ADVANTAGES
<ul style="list-style-type: none"> • Permission is not prohibited • No prior authorisation is required for granting 	<ul style="list-style-type: none"> • Direct or indirect association with office holders • The value of the hospitality exceeds the local limit • The value of the gift exceeds the local limit • The overall value of individual contributions exceeds the local annual limit • Connection with tender procedures 	<ul style="list-style-type: none"> • Actively required • Consideration or reward (quid pro quo) • Payments in the form of money or cash equivalents (e.g. vouchers) • Facilitation payments • Not transparent • Origin, value, purpose or circumstances are inappropriate • Timing with the conclusion of the contract • Violation of applicable law that EXPRESSLY prohibits certain personal inducements.

3.1 Unauthorised subsidies (red traffic light)

Regardless of the specific circumstances, granting or accepting advantages is generally prohibited in the following cases, as they entail a high risk of corrupt dealings:

- Granting or accepting a personal advantage if the recipient expressly requests or demands it.
- To perform or accept a benefit in expectation of a benefit in return (quid pro quo).



- Granting or accepting a financial reward, including cash (or cash equivalents, e.g. vouchers),
- Transfers, loans at below market interest or no interest, shares, stock options, etc. without corresponding authorisation.
- Facilitation payments
- Granting or accepting an advantage in a concealed (non-transparent) manner, especially if a private address or a private e-mail address is used.
- We advise you to generally involve the recipient's employer or supervisor if you intend to provide a benefit.
- Granting or accepting an advantage, the nature or value of which does not suit the circumstances, the occasion or the recipient's position. This includes in particular:
 - Invitations to nightclubs, casinos or other types of "adult entertainment"
 - Subsidies that are granted so frequently that accepting or granting them is considered inappropriate.
- Granting or accepting a personal advantage around the same time that important business decisions are made, such as the conclusion of a contract, the awarding of a commission, etc.
- Granting or accepting personal inducements that are expressly prohibited by applicable laws or other regulations.

What are facilitation payments?

Facilitation payments are payments made to officials to initiate or expedite a routine official procedure to which there is an entitlement. They do not have to be related to any misconduct on the part of the public official.

3.2 Personal benefits requiring approval (amber traffic light)

Unless a personal advantage is prohibited under Section 3.1, the following advantages may only be granted or accepted subject to the prior approval of Compliance.

- Any advantage granted to an office holder or a third party associated with him or her (e.g. close relatives or friends). This may also be a more unconventional advantage, such as the awarding of a traineeship to a person closely related to the public official.
- Any payment to a third party who interacts, has interacted or is likely to interact with office holders in connection with MUEGGE's activities.
- Hospitality, the value of which exceeds the limit applicable in the recipient's country.
- A gift, the value of which exceeds the limit applicable in the recipient's country.
- Any benefit provided by an employee of MUEGGE Group to a third party if the total value of the benefits provided to that third party in the preceding 12 months exceeds the applicable annual limit.
- Any benefit received by an employee of MUEGGE Group from a third party if the total value of the benefits provided by that third party in the preceding 12 months exceeds the applicable annual limit.
- Any granting or acceptance of subsidies within the context of tendering procedures.



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Application for the granting of a permit

Compliance is responsible for this.

Please note:

If, in exceptional circumstances, it is not possible to obtain approval before granting or receiving a benefit, the employee in question must inform the responsible Compliance staff member immediately after the benefit has been granted or received. Compliance is also responsible for documentation and notification. Reimbursement of the costs incurred is not permitted if the granting or acceptance of the benefit is excluded pursuant to Section 3.1.

3.3 Permissible personal benefit (green traffic light)

Pre-approval is not required if accepting or granting the subsidy is not prohibited pursuant to Section 3.1 and if the subsidy does not have to be approved pursuant to Section 3.2.

4 Obligation to retain and archive documents

Proper documentation is crucial when it comes to combating corruption. It can prevent acts of corruption occurring in the future and helps to investigate past incidents of corruption.

You are obliged to properly and accurately document and properly account for all inducements that you intend to grant or accept and that require prior approval (Section 3.2.) or are permissible (Section 3.3.). Inform your COMPLIANCE contact person immediately if a subsidy needs to be approved. Contact the Compliance Team to obtain information and documentation. Proper documentation may be reviewed by Compliance without prior notification.

5 Donations and sponsorship

As a responsible member of society, MUEGGE Group welcomes donations to charities and non-profit organisations as well as the sponsorship of events.

The following rules apply to all donation and sponsoring activities undertaken by MUEGGE Group:

All charitable donations and sponsorship activities require the prior approval of a staff member of COMPLIANCE of MUEGGE Group.

All charitable donations and sponsorship payments must be made in a transparent manner. This means that the identity of the recipient and the purpose of the donation/sponsorship must be clearly stated and the reason and purpose of the donation/sponsorship must be explained and documented.

The following fundraising and sponsorship activities are prohibited:

- Donations to or the sponsorship of politicians, political parties or political organisations;



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- Donations to for-profit organisations;
- Donations to organisations the objectives of which are incompatible with the corporate principles of MUEGGE Group or which could be detrimental to the company.

What is a “donation”?

The voluntary provision, i.e. without any legal obligation and the anticipation of a reward or consideration, of money, material goods or benefits for charitable purposes to non-profit and charitable organisations. Donations may also include benefits or work product if no full consideration is given in return (e.g. providing a benefit to a social institution at a reduced price).

What does “sponsorship” mean?

Assistance provided to individuals, a group of individuals, organisations or events because there is an expectation of reciprocation for marketing purposes.

6 Discounts

Non-transparent and untraceable discounts can give rise to allegations of corruption, as the profit margins achieved as a result of inappropriate discounts could theoretically be used as bribes.

Therefore, discounts may only be granted on the basis of comprehensible, predefined and documented criteria, such as the quantity of goods purchased, the punctuality of payments or comprehensibly and transparently documented sales targets.

7 Third-party representatives

Anti-corruption laws and this Policy apply not only to payments made by MUEGGE Group and its employees, but also to payments made to “third-party representatives”.

MUEGGE Group may be held liable for impermissible payments made by third-party representatives on behalf of MUEGGE Group. For this reason, MUEGGE Group expects third-party representatives to act in compliance with the highest ethical standards and all applicable laws at all times.

MUEGGE Group expects you to be alert to signs that a third-party representative has acted or may act unlawfully. Do not ignore any indications of unlawful payments, and always inform your line manager or COMPLIANCE of your concerns.

The following principles relating to third parties MUST be adhered to at all times:

- Do not circumvent MUEGGE Group rules and policies by using third-party representatives to do something that MUEGGE Group itself would not be permitted to do. A third-party representative may mistakenly believe that, as a local person or company, he or she is “permitted to play by local rules”.
- Any payment to a third-party representative must be recorded accurately and in full for accounting purposes and may not be split or disguised in any way.
- Payments to third parties may not be made in cash, to other parties or to bank accounts in countries other than the country of the business partner's business activity or head office.



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What is a “third-party representative”?

All business partners, who

- provide benefits in connection with the sale of MUEGGE Group products; and
- are paid a salary, commissions, bonuses, referral fees or other similar consideration by MUEGGE Group.

These include, for example, agents, lobbyists, intermediaries, sales representatives, sales consultants, system integrators, etc.

Recognise third-party representatives

A straightforward way of differentiating is to look at MUEGGE Group's contractual obligations vis-à-vis the business partner. If MUEGGE Group only supplies products and receives a purchase price in return, the business partner is not a “third-party representative”. However, if the business partner is involved in MUEGGE Group's sales activities and receives something other than MUEGGE Group products in return, especially if it receives money, it is a relevant “third-party representative”.

If you are not sure if a business partner may be a third-party representative, please contact a COMPLIANCE staff member.

The following rules apply in to further reduce the risk of a third-party representative acting on behalf of MUEGGE Group in an illegal or improper capacity – including the payment of bribes.

7.1 Verifying the integrity of third-party representatives

If you are responsible for initiating a business relationship with a new potential third-party representative or if you continue to work with a third-party representative who has not made a voluntary commitment in the preceding three years, it will be necessary to run an integrity check on the (potential) third-party representative. This includes:

- Coordinating with the sales department or the purchasing department
- Applying for a permit, including performing a background check and providing the information with the support of Compliance; and
- Recognising all the warning signs of corruption.

Warning signs may include, for example:

- A public official recommends a particular person or company as a third-party representative.



- A (potential) third-party representative refuses to confirm that it does not engage in any form of improper payment.
- A (potential) third-party representative has a reputation for paying bribes.
- A (potential) third-party representative demands cash payment.
- A (potential) third-party representative requests that payments be made through a third party or to a bank account in a third country, or wishes to make other unusual financial arrangements for which there is no valid explanation.
- A (potential) third-party representative is not listed in the usual industry directories or is completely unknown to people with knowledge of the market and/or industry.
- An audit of the management of the (potential) third-party representative reveals suggestions of suspicious activities or demonstrates non-compliance with applicable rules or regulations.
- The negotiating partner does not seem to care about the price they pay for MUEGGE products or otherwise has doubts about their profit-driven activities.
- Complete the “Due Diligence Checklist” carefully for all third-party representatives and submit it (including any warning signs of corruption) for review and approval by MUEGGE Group COMPLIANCE.

The COMPLIANCE staff member responsible will review the assessment of each proposed third-party representative. If questions about specific issues or risk areas persist after this review, any further steps that are deemed necessary can be initiated (e.g. clarifying additional issues or commissioning an external benefit provider to conduct a comprehensive review).

In addition to this integrity check, you are obliged to keep a continuous eye out for the above-mentioned warning signs of corruption and to immediately report any suspicions to MUEGGE Group COMPLIANCE.

8 Joint ventures, mergers and acquisitions and other business combinations

In the case of joint ventures, mergers, acquisitions or other business combinations, it is necessary to adopt additional anti-corruption measures, as the past and future conduct of the respective partner or acquisition target may result in liability for MUEGGE Group.

With regard to joint venture partners, MUEGGE Group is required to take appropriate measures to ensure that the joint venture entity does not initiate, has not initiated or will not initiate unlawful payments that may violate applicable anti-corruption laws. Joint venture partners – as well as third-party representatives – may expose MUEGGE Group to liability risk as a result of their inappropriate conduct. Even if MUEGGE Group merges with or acquires other companies or participates in other business combinations, MUEGGE Group may be held liable under applicable anti-corruption laws. This not only applies to violations of anti-corruption laws applicable at that time, but also to unlawful gratuities or conduct that occurred prior to the merger, acquisition or business combination, as well as ongoing violations. With regard to this type of transaction, MUEGGE Group's Anti-Corruption Policy includes the following two important steps.

8.1 Anti-corruption due diligence prior to the transaction

MUEGGE Group has set out a due diligence and assessment process that has to be adhered to before entering into any joint venture, merger, business acquisition or other business combination. If you are involved



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in proposing, selecting or executing such a transaction, you must adhere to this process to gain an understanding of the other party and the potential corruption risks associated with the transaction in question. Similar to the due diligence review of third-party representatives, any warning signs of corruption identified during the due diligence process must be investigated and remedied before the process can continue. Assurances, guarantees and anti-corruption agreements must be included in the relevant contracts as necessary.

8.2 Post-transaction anti-corruption due diligence

Even after a transaction has been completed, MUEGGE Group is required to perform its COMPLIANCE responsibilities in relation to the joint venture or the acquired company on an ongoing basis. This includes adopting and implementing MUEGGE Group's COMPLIANCE programme (including the Code of Conduct, this Anti-Corruption Policy and all related policies and procedures) across all acquired businesses. With regard to joint ventures, MUEGGE Group is required to take suitable steps, having taken its shareholding and exercise of control into account, to ensure that a COMPLIANCE programme (including an anti-corruption policy) is implemented when the joint venture commences. MUEGGE Group is also required to monitor the conduct of the joint venture partner to ensure that it does not behave inappropriately in the name of or on behalf of the joint venture.

9 Contact

Should you have any questions regarding this Anti-Corruption Policy or Compliance, please contact MUEGGE Group Compliance or any member of the Compliance team.

10 Review

This Anti-Corruption Policy is regularly reviewed by MUEGGE Group Compliance. It may be amended in response to legal requirements or business needs. For this reason, please ensure that you always use the most up-to-date version, which you can find at the following address

<https://www.MUEGGEgroup.com/Compliance>



11 Appendix A



11.1 Granting gifts in the private sector

WHAT		HOW
<p>Gifts worth max. € 50 per recipient (= individual person) and per six-month period.</p>		Permitted
<p>Direct connection to a specific business decision/procurement decision by the business partner.</p> <p>The provision of the gift is subject to conditions.</p> <p>Gifts exceed a total of € 50 per recipient (= individual person) per six-month period.</p> <p>Cash gifts</p>		<p>Not permitted</p> <p>Not permitted</p> <p>Not permitted</p> <p>Not permitted</p>


11.2 Issuing invitations to attend business dinners in the private sector

WHAT		HOW
<p>Invitations in accordance with local custom up to a value of € 100 per guest per six-month period.</p>		Permitted




WHAT		HOW
Managing directors invite business partners to attend business lunches/dinners that exceed the value of € 100 per guest if this is required in the interests of the company.		Permitted, but must be documented in writing. The documents must contain the following information: Objective, name and position of guest, relationship between the parties, nature, value and time of invitation.
Invitations exceeding the value of € 100 per six-month period and guest (the person issuing the invitation is not a director).		Not permitted

11.3 Issuing invitations to events in the private sector

WHAT		HOW
Invitations to events that are explicitly of a business nature (e.g. training courses, company or product presentations) including suitable hospitality.		Permitted if the invitation is addressed to the respective company address and printed with the company's letterhead, or as an official e-mail invitation with a reference to the company. The invitation must also be made conditional upon the approval of the company that has been invited, as the business partner may itself be obliged to adhere to a code of conduct. Travel and accommodation costs must be borne by the business partner.



WHAT		HOW
<p>Invitations to events that are not explicitly of a business nature or do not have a business aspect to them, of a value of up to € 200 per person per year.</p> <p>Extending invitations to accompanying persons</p> <p>Multiple invitations from the same business partner</p>		<p>Permissible if the arrangement of the non-business aspect is appropriate, taking the external impression into account.</p> <p>The invitation must be addressed to the respective company address and sent using the company's letterhead or as an official e-mail invitation with a reference to the company.</p> <p>The invitation must also be made conditional upon the approval of the company that has been invited, as the business partner may itself be obliged to adhere to a code of conduct.</p> <p>Travel and accommodation costs must be borne by the business partner.</p> <p>Permitted if attending without an accompanying person would be inappropriate (e.g. gala dinners, balls). Events and guest lists must be documented.</p> <p>Permitted if the total value of € 200 per person per year is not exceeded.</p>





WHAT		HOW
Direct connection with business decision/procurement decision by the business partner.		Not permitted. The invitation may not be extended.
Assumption of travel and accommodation costs.		Not permitted. Travel and accommodation costs must be borne by the business partner.

11.4 Granting advantages to public officials

WHAT		HOW
Gifts to office holders		Not permitted, at most promotional gifts of low value up to € 5 and if this is permitted in accordance with statutory and official regulations.
WHAT		HOW



<p>Within the context of an official decision /procurement decision by the public official in question</p> <p>The provision of the gift is subject to conditions</p> <p>Cash gifts</p>		<p>Not permitted</p> <p>Not permitted</p> <p>Not permitted</p>
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WHAT		HOW
<p>Inviting officials to an appropriate business lunch (e.g. a standard lunch as part of a company or product presentation).</p>		<p>Permitted, but under no circumstances must there be any impression of influence being exerted.</p>
WHAT		HOW




<p>Within the context of an official decision /procurement decision by the civil servant in question</p>		<p>Not permitted. The invitation may not be extended.</p>
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WHAT		HOW
<p>Events that are explicitly of a business nature (e.g. training courses, company or product presentations) including suitable hospitality.</p>		<p>Permitted travel and accommodation expenses are to be borne by the public official.</p> <p>Reasonable hospitality means, for example, a standard lunch</p>
WHAT		HOW





<p>Events where the business aspect is not clearly predominant (e.g. sponsoring, marketing or sales events).</p> <p>Invitation of private accompanying persons</p>		<p>Permitted if the employer has agreed in writing. The arrangement of the non-company component of the event must be appropriate and with a view to the company's external image.</p> <p>The organiser is required to record and archive the events, guest lists and supporting documents.</p> <p>Permitted travel and accommodation expenses are to be borne by the public official themselves.</p> <p>Permitted if attending without an accompanying person would be inappropriate.</p>
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WHAT		HOW
<p>Within the context of an official decision /procurement decision by the public official in question.</p> <p>Invitations to office holders to attend events of a non-business nature.</p>		<p>Not permitted. The invitation may not be extended.</p> <p>Not permitted. The invitation may not be extended.</p>






11.5 Acceptance of benefits by employees of MUEGGE Group

WHAT		HOW
<p>Gifts worth max. € 50 per business partner and six-month period.</p>		<p>May be accepted</p>
<p>Directly connected to business decision/procurement decision with reference to the business partner extending the invitation.</p> <p>The acceptance of the gift is subject to conditions.</p> <p>The gift exceeds € 50 per business partner and six-month period.</p> <p>Acceptance cash gifts</p>		<p>Not permitted</p> <p>Not permitted</p> <p>Not permitted</p> <p>Not permitted</p>



WHAT		HOW
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<p>Invitations in accordance with local custom up to a value of € 100 per party extending the invitation and once six-month period.</p> <p>Managing directors are invited to business lunches/dinners exceeding a value of €100.</p>		<p>May be accepted.</p> <p>Permitted if required in the interests of the company and legally permitted.</p>
<p>WHAT</p>		<p>HOW</p>
<p>Extending invitations to accompanying persons</p>		<p>Permitted if prior approval is obtained from line manager.</p> <p>The supervisory authority must assess if acceptance is in the best interests of the company.</p>
<p>WHAT</p>		<p>HOW</p>
<p>Invitation exceeds the value of € 100</p>		<p>Not permitted. The invitation may not be accepted.</p> <p>Exceptions: Managing Director, see above.</p>

<p>WHAT</p>		<p>HOW</p>
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<p>Invitations to events that are explicitly of a business nature (e.g. training courses, company or product presentations) including suitable hospitality.</p> <p>Employees of MUEGGE Group give training courses, speeches or lectures free of charge at the invitation of third parties.</p>		<p>Permitted. Travel and accommodation costs must be borne by the participants themselves.</p> <p>Permitted. Travel and accommodation costs may be covered by the party extending the invitation.</p>
<p>WHAT</p>		<p>HOW</p>
<p>Participation of employees of MUEGGE Group in events of an ambiguous or non-business nature of max. € 200 per person per year.</p> <p>Taking private accompanying persons along</p>		<p>Permissible if the arrangement of the non-business aspect is appropriate, taking the external impression into account.</p> <p>Travel and accommodation costs are to be covered by the respective MUEGGE Group company.</p> <p>Permitted if attending without an accompanying person would be inappropriate.</p>
<p>WHAT</p>		<p>HOW</p>



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<p>Direct connection to the business decision (procurement decision) by the MUEGGE Group employee.</p>		<p>Not permitted. The invitation may not be accepted.</p>
<p>Participation in events with a value exceeding € 200 per person per year.</p>		<p>Not permitted. The invitation may not be accepted.</p>

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