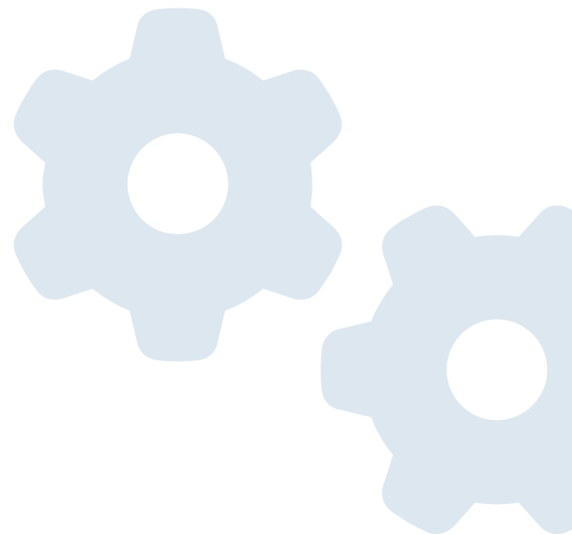


ANTI-CORRUPTION POLICY



CONTENT

I. Scope and focus	3
II. A sense of proportion: what it is all about	3
III. Definitions of terms	4
IV. Primary objective: Prevention of criminal offenses in the area of corruption	5
V. Relevant individual issues	6
1. Conflicts of interest	6
2. Gifts and benefits (granting and acceptance)	7
3. Hospitality/business meals	8
4. Taxation	8
5. Sales agents/ supply chain /third party	8
6. Facilitation Payments	9
7. Services and work performed by business partners	9
8. Sponsorship	9
9. Monetary donations	10
10. Training and further education, trade fairs	10
11. Discounts, bonus programs and other benefits for employees	11
12. Lobbying	11
VI. Communication, training and monitoring of this policy	11
VII. Implementation of the requirements: Personal responsibility	12
VIII. What to do in the event of a potential breach?	12
IX. Entry into force/ revision and improvement	13

I. SCOPE AND FOCUS

This policy applies to all current and future PPI companies worldwide. The content of this policy relates to the prevention of corruption. The more important the individual topics are for PPI, the more detailed they will be dealt with.



II. A SENSE OF PROPORTION: WHAT IT IS ALL ABOUT

Corruption can have many faces and occur in many constellations, and can also be a precursor to corruption. For this reason, the acts that constitute criminal offences in the area of corruption are presented first. These are always prohibited. This is followed by constellations (from point V.) that do not in themselves constitute criminal offences, but either appear to do so or could be precursors to a corruption offence. Permissible courses of action are outlined here as far as possible. Specific examples of correct behaviour from the company's own practice will be given during the training courses.

Each employee is responsible for complying with and implementing the guidelines themselves. The respective line manager checks this. The Chief Compliance Officer supports compliance through the statements in this guideline, further information and training.



III. DEFINITIONS OF TERMS

In order to understand the terms used in connection with corruption, it is first important to describe them. This ensures a common understanding of the terms and prevents misunderstandings.

Corruption

Corruption is the abuse of entrusted power for private gain or advantage.

Benefit/advantage in the sense of the law

Benefit/advantage means any material or immaterial, objectively measurable improvement in the personal, economic or legal situation of the beneficiary to which the beneficiary is not entitled.

Public officials

Public officials are all persons who hold an office under public law or perform public administration tasks. This includes not only civil servants, judges and notaries, but also employees of public authorities, e.g. customs, and municipal companies.

PEP

A politically exposed person (PEP for short) is any person who holds or has held a high-ranking important public office at international, European or national level or below national level. Examples of PEPs are heads of state, ministers, state secretaries, members of parliament, honorary consuls, members of the governing bodies of political parties, ambassadors or members of the administrative, management and supervisory bodies of state-owned companies.

Conflict of interest

A conflict of interest in the company exists when official decisions are influenced by private interests.



IV. PRIMARY OBJECTIVE: PREVENTION OF CRIMINAL OFFENSES IN THE AREA OF CORRUPTION

The primary objective of the PPI in the fight against corruption is to prevent criminal offenses. Corruption is only a generic term under which various types of criminal offense can fall. These are therefore explained first in order to better understand what exactly is involved.

Relevant offenses

The relevant offenses under German law are primarily the following as an example:

Granting benefits (Section 333 StGB/Granting benefits) is the offering, promising or granting of an advantage to a public official or a third party for the lawful performance of official duties.

Bribery of public officials (Section 334 StGB/Giving bribes) is the offering, promising or granting of an advantage to a public official or a third party for the unlawful performance of official duties.

Taking and giving bribes in commercial practice (Section 299) means that an employee or agent accepts or offers an advantage for a lawful or unlawful act and thereby unfairly favors the competition.

There are comparable offenses in other countries.

The term advantage or benefits (see definitions) is used in all three types.

Examples of advantages include

- Invitations and gifts
- Provision of premises or machinery without payment
- Unjustified promotions
- Unjustified remission of a loan
- Benefits for goods or vouchers
- Shares and other securities
- Services below market value
- Granting of a share in property or profits
- Works of art
- Education costs
- Wine and spirits and similar high-priced foodstuffs
- Clothing and jewelry for the recipient or spouse
- Free luxury transportation
- Lavish entertainment
- Paid vacations

What never works

The PPI prohibits all acts that constitute the above-mentioned offences or their local equivalents in the respective country. This means that advantages may never be granted to induce a lawful or unlawful act by a business partner, a public official or a PEP, or to demand or grant an advantage in order to unfairly favor competition.

What may be possible

All other constellations in which advantages may be received or given are dealt with in the following points. These are often possible, permitted in a certain way or may be made possible with release reservations. It is not the aim of PPI to prohibit employees from receiving any gifts or attending events. Rather, the aim is to prevent behavior that may appear to violate a law or to structure it in such a way that such an appearance does not arise or is refuted.

V. RELEVANT INDIVIDUAL ISSUES

1. Conflicts of interest

What is a conflict of interest?

A conflict of interest in the company exists when official decisions are influenced by private interests.

This is often the case in the following situations:

- Selection of relatives or friends for job advertisements
- Awarding supply and service contracts to relatives or friends
- Invitation to an event that is not primarily business-oriented
- Private commissioning of business partners of the company over whom influence can be exerted through one's own position in the company
- Direct reporting lines between spouses, partners or relatives
- Exercising an activity that conflicts with the activity at PPI, in particular
 - operational activity at a competitor company
 - participation in a competitor company to a relevant extent
 - exercise of secondary activities

What do I need to bear in mind?

Private and professional interests must be kept separate. This is necessary so that decisions for the company can be made impartially and, as a result, secondary obligations under the employment contract can be complied with.

Prevention is the best approach here, i.e. conflicts of interest should be avoided as far as possible from the outset.

What to do if a conflict of interest does arise?

First of all, the potential conflict of interest must be disclosed to the direct superior (create transparency). The line manager and, if the line manager is not **already the direct superior, a managing director should check whether a conflict of interest actually exists.**

If so, it must be jointly considered whether private and business interests can be balanced to a certain extent or whether the business interests of PPI alone are paramount in the specific case. The decision must be documented by the examining managing director.

2. Gifts and benefits (granting and acceptance)

What is it about?

Gifts and gratuities may, to an appropriate extent, be a permissible means of establishing and maintaining business relationships. However, they must not jeopardize the professional independence of employees and lead to irrelevant decisions. The external perception of third parties, i.e. not the parties involved, is decisive here. It is therefore important for PPI and employees to avoid any appearance of influence.

Gifts and benefits to public officials and politically exposed persons (PEPs)

In principle, public officials and PEPs may not receive any benefits. If, in exceptional cases, this appears unavoidable in connection with a public official, this must be agreed in advance with the CCO and it must be clarified whether this is possible or should be avoided.

No benefits may be accepted from PPI employees by public officials and PEPs.

Receiving and giving gifts and benefits without public officials/PEPs

Gifts and gratuities are not generally prohibited without the involvement of public officials/PEPs. Each employee must observe the following rules to avoid typical pitfalls in this area that could get them and/or PPI into trouble:

- Occasion and value are appropriate in the respective country
- a maximum of 2 gifts from/to the same person per year
- No gifts of money
- Gifts are not closely related in time to contract and award decisions
- Gifts/grants must be documented by the recipient/donor. This can be checked by the management.
- Promotional items/gifts up to 10 euros (e.g. ballpoint pens, shopping cart chips, notepads etc.) do not count as such. These may also be accepted without documentation.

Behavior in the event of return/rejection/raffle of gifts

The receipt of gifts to PPI employees currently consists only of giveaway items. If, contrary to expectations, other gifts are given to employees that exceed the above limits and are not returned for cultural reasons (e.g. loss of face), an individual decision will be made with the CCO.



3. Hospitality/ business meal

The acceptance/granting of hospitality from/by business partners is permitted if all of the following conditions are met:

- the business occasion is present
- hospitality is customary and appropriate
- no temporal proximity to contract and award decisions that could influence them
- max. 95 euros per person, max. 3 times a year
- no public officials/PEPs, the zero rule applies here: no acceptance/grant of any kind
- sufficient documentation: in any case, the persons and the company hosted, the occasion and topic of the hospitality, the location of the hospitality and the costs must be documented

With regard to other travel and accommodation expenses, the regulations of the respective local travel expense guidelines apply.

Public officials and PEPs are generally not permitted to receive hospitality. If, in exceptional cases, hospitality for a public official appears unavoidable, this must be agreed in advance with the CCO and it must be clarified whether this is possible or should be avoided.

No hospitality may be provided to or accepted from PPI employees by public officials or PEPs.

4. Taxation

Benefits are properly recorded in the accounting accounts and tax aspects are taken into account both when granting and accepting.

5. Sales Agents/ supply chain / Third Party

PPI does not currently work with sales agents, i.e. no third parties are used as sales intermediaries. Should this change, the necessary requirements will be added.

With regard to other business partners, including the supply chain, PPI is aware of its corporate responsibility in the context of third party management and also complies with any existing legal requirements.

6. Facilitation Payments

Facilitation payments are payments made to officials to speed up the fulfillment of tasks for which there is no discretionary power. These payments are only intended to influence the timing of the official's actions (e.g. payments to expedite the issuance of a visa or the customs clearance of goods), but not their outcome. The PPI prohibits facilitation payments, regardless of whether they are permitted under local legislation.

7. Services and work performed by business partners

In principle, PPI business partners' services or work should not be used privately by employees, as this can quickly lead to the appearance of unfair advantage.

If, in unavoidable exceptional cases, services or work performed by business partners are used privately by employees, this is only permitted at normal market conditions. This must be documented by the employee and can be checked.

8. Sponsorship

What is sponsorship?

Sponsoring is the financial support of an event by PPI. In return, PPI receives the opportunity to place image-promoting advertising activities in connection with the event in accordance with the amount of the sponsorship.

Permissible form of sponsorship

Sponsoring is permissible if the event has a certain publicity effect and is related to the area of application of PPI's products. The sponsorship amount to be paid must be appropriate to the advertising opportunity granted.

9. Monetary donations

What are monetary donations?

Monetary donations are a one-sided service relationship that may only ever be made for the benefit of the general public and tied to a specific charitable purpose.

Who is a permissible recipient of a donation?

Recipients may only be organizations or persons who can issue a donation receipt in accordance with local tax law. These are, for example, non-profit, charitable or social organizations. If there are no such local tax regulations, donations are permissible if they serve comparable charitable, benevolent or social purposes.

How does a donation work?

Every donation must be approved in advance by the managing director. A donation receipt must be issued by the recipient to PPI, insofar as this is possible under national law. Otherwise, the recipient must issue a donation receipt for the donation. The donation account should always be in the respective country and be the official account of the organization. The donation must be documented transparently and comprehensibly by the donating function / person at PPI.



10. Training and further education, trade fairs

PPI conducts face-to-face training and / or e-learning for a fee, which does not entail any risk of corruption. For trade fairs, admission tickets or trade fair-specific voucher booklets with one or more electronic codes are issued, which can be used to purchase a personalized admission ticket online. This poses no relevant compliance risk and can be continued. Catering at the stand as part of a trade fair may only be on a small scale, i.e. drinks, sandwiches, sausages, finger food or similar.

11. Discounts, bonus programs and other benefits for employees

PPI offers general bonus programs for its employees or permits participation in them (e.g. bonus programs of Deutsche Bahn, Lufthansa, etc.). The benefits thus acquired for business purposes may also be used privately. Other discounts or benefits granted by customers or agreed individually are not permitted.

12. Lobbying

PPI does not support any political organizations and does not influence any kind of political decision-making.

VI. COMMUNICATION, TRAINING AND MONITORING OF THIS POLICY

Employees are responsible for implementing the requirements of this policy (more on this in section VII.). In order to provide employees with certainty as to exactly what is expected of them, this policy and its contents are repeatedly communicated, explained and trained in part and in full by the CCO and the Local Compliance Managers (LCM). The basic principles of corruption prevention, etc. are also repeatedly explained and included in the induction plan during onboarding. The CCO and LCMs also provide support in the development and implementation of measures to prevent corruption.

VII. IMPLEMENTATION OF THE REQUIREMENTS: PERSONAL RESPONSIBILITY

Implementation by the employees

Insofar as activities are permitted in the above points, it is the responsibility of each individual employee to adhere to the requirements of this guideline and to implement them.

What is always important: clean documentation

Every process must be properly documented by the employee. This means that an uninvolved third party must be able to see from the documentation that the employee and PPI have behaved or behave in a proper manner in the area of corruption and that any possible appearance of corruption can be refuted. This documentation is therefore particularly important if an authority or a court comes to the PPI and checks whether or not it has acted in accordance with the rules.

Control

In contrast to some other companies, where every action is checked in advance by the compliance department, PPI relies to a large extent on the personal responsibility of employees. However, as it is a legal obligation to check the company's anti-corruption efforts, the management takes on this task.



VIII. WHAT TO DO IN THE EVENT OF A POTENTIAL BREACH?

The respective LCM and the CCO must be notified immediately of any potential or actual breaches. Options for action are then discussed together, particularly in the case of breaches that have not yet occurred. It is also possible to report compliance problems via the group-wide established whistleblowing tool "Hintbox" (anonymously) [under this link](#). This opens up a further digital channel for drawing attention to possible non-compliance and thus helping to identify and rectify problems at an early stage.

If employees (knowingly) violate this policy, PPI will take appropriate action against the employee. This can range from personal counseling to steps under employment law such as a warning or dismissal, criminal prosecution in cooperation with law enforcement authorities or civil claims for damages by PPI against the employee.



IX. ENTRY INTO FORCE / REVISION AND IMPROVEMENT

This policy comes into force on 01 December 2024.

This policy will be reviewed regularly and amended as necessary by the Chief Compliance Officer.

