

Anti-Corruption Policy

of the Peach Group

August 2022

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with values.

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Note: This English text is a non-binding convenience translation of the German original. In case of differences between the German and the English versions, the German text prevails.

1. Introduction

Corruption is the abuse of entrusted power for private gain¹. The private gain must not necessarily be for the person in question, but can also be to the benefit of a third party, particularly the employer.

The Peach Group undertakes to conduct its business in an ethical and responsible manner and is committed to fair competition.

We conduct our business honestly and transparently. We prohibit any form of corrupt behavior towards public officials and private individuals, whether directly or through third parties, and pursue a zero tolerance policy with regard to bribery and other corrupt behavior of any kind and form, not only within the company but also among our business partners. Corruption is not a trivial offense.

2. Scope

This policy is based on the provisions that apply Group-wide, particularly the Code of Conduct, and applies to all persons at all levels who work for us or on our behalf. It is accordingly applicable to all members of the Board of Directors and the Executive Management, senior managers, members of the Management Board (*Vorstand*) and employees (whether permanent, fixed-term or temporary) of the Peach Group.

However, we also expect our business partners, including suppliers, intermediaries and joint venture partners, etc., to act ethically and with integrity within the meaning of this Policy. In this context, we would also like to refer you to our Code of Conduct for Business Partners of the Peach Group, which you can find on our website.

3. Prohibition of corruption

Our employees, bodies and representatives are strictly prohibited from offering (active bribery) or accepting (passive bribery) bribes in the form of payments, non-cash gratuities or other inappropriate incentives regarding government agencies and institutions, customers, suppliers or other opposite parties for the purpose of improperly obtaining or

¹ General definition of corruption (source: Transparency International).

maintaining contracts, business, approvals by public authorities or favorable tax or customs regulations, and from otherwise obtaining improper business advantages.

This prohibition also covers “expediting payments”² or the practice of “Anfüttern”³ (oiling the wheels).

4. Code of conduct for corruption prevention

Transparency is key in preventing corruption. This includes correct accounting in particular.

We keep books and records that precisely document the sources and applications of proceeds and assets in appropriate detail. “Off-the-books” accounts and incorrect or misleading entries in our books and records are prohibited.

All financial transactions must be documented, checked regularly and correctly posted in the books and records. This also means that an invoice is issued, or will be issued subsequently, for each delivered or provided service or product, and that there is a traceable connection between the order, invoice and payment.

In addition, we observe the gifting principle set down in the Code of Conduct, which states that we do not accept gifts, invitations or other gratuities that are or could be related to our professional activities. Socially customary occasional gifts of insignificant value⁴ are excluded from this, although the greatest restraint must also be exercised in this case; under no circumstances may the appearance of a potential obligation arise. Money or substitutes for money are never occasional gifts, regardless of the amount, and may never be accepted.

² Expediting payments, also known as facilitation payments, are payments of small amounts not provided for by law for the purpose of inducing a public official to accelerate or perform an official act to which the company is generally entitled (e.g. the issuance of a building permit).

³ *Anfüttern*, or “oiling the wheels”, does not involve defining a concrete return service or consideration by a public official, but it is clear to the parties involved that the public official will grant an advantage related to their official position (source: Transparency International).

⁴ The amounts up to which non-cash gratuities are still considered minor can be found in the Code of Conduct.

In particular, the following principles must be followed to prevent corruption:

- Employees conduct business transparently (transparency principle).
- Business transactions must be documented in text form, in particular performance and counter-performance, so that each transaction can be traced (documentation principle).
- Employees may not exploit the company's business connections for their own or others' benefit or to the detriment of the company (separation principle).

5. Prevention of money laundering

In addition to our anti-corruption measures, we also undertake to cooperate in the international fight against money laundering and financing terrorist acts.

We observe all applicable statutory regulations on preventing money laundering and comply with the applicable economic and trade sanctions, and demand that our business partners do the same.

6. Consequences of violations

Violations of anti-corruption or anti-money laundering laws may result in particular in heavy fines, civil liability, high lawyer's and consulting fees, damage to reputation and stock market value through exchange loss. Offending employees also face prison sentences and consequences under labor law. Such drastic consequences can be avoided if we all abide by the law and thus help to combat corruption and money laundering.

7. Reporting and whistleblower protection

All Peach Group employees assist in detecting, preventing and reporting cases of bribery and corruption, as well as other suspicious acts, such as possible money laundering.

Anyone who becomes aware of possible violations of this Policy shall notify their superior or the General Counsel or Head of Legal (Germany) without delay. The additional option of anonymous reporting via the dedicated external reporting system, which consists of a reporting portal ([link](#)) and a hotline and complies with the EU whistleblower directive, is also always available. Our employees can report legal violations using this system. These reports can be made anonymously and confidentially. This report is transmitted to the externally appointed ombudsperson responsible for cases of whistleblowing.

8. Entry into effect

This Anti-Corruption Policy was put into effect by the Board of Directors of the Peach Property Group AG as of August 1, 2022.