

# We are committed!

## Code of Conduct of the ANWR GROUP

Mainhausen, April 1, 2025

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# Table of contents



<b>Preface</b>	3
<b>About our “Code of Conduct“</b>	4
<b>This is what we stand for</b>	5
<b>1. Ethics and integrity</b>	6
1.1 Compliance with law and order	7
1.2 Avoidance of conflicts of interest	7
1.3 Fair competition	7
1.4 Money laundering and fraud prevention	8
1.5 Political representation of interest	8
1.6 Donations	8
1.7 Appearance and communication in public	8
<b>2. Human and employee rights</b>	9
2.1 Human rights	10
2.2 Equal treatment and non-discrimination	10
2.3 Forced and child labor	10
2.4 Freedom of association	10
2.5 Remuneration	11
2.6 Cooperation with employee representatives	11
2.7 Occupational health and safety	11
<b>3. Sustainability</b>	12
3.1 Sustainable corporate governance	13
<b>4. Dealing with information</b>	14
4.1 Reporting	15
4.2 Confidential information	15
4.3 Data protection and information security	15
<b>5. Protection of company property</b>	16
<b>6. Implementation and contact persons</b>	17

## Preface

Dear colleagues,

It is our common task to maintain the trust of our colleagues, business partners, customers and our entire environment and to protect our company. This “Code of Conduct” forms the foundation for this. The “Code of Conduct” is based on our corporate mission statement. It formulates the standards we set for ourselves within the GROUP and defines how we want to treat each other. At the same time, it is a valid promise for responsible behavior towards partners, society and the environment.

It clearly sets out the values on which our daily collaboration is based and how we exemplify these through our behavior every day. Our cooperation is characterized by team spirit. With the help of our creative power, we question the status quo and boldly break new ground. Our passion enables us to achieve our ambitious goals with passionate focus. We create stability with consistency. This is how we make retail successful!

We maintain our good reputation in the industry through personal responsibility, openness and transparency as well as legally compliant and ethically correct behavior at all times. Adherence to the “Code of Conduct” and the associated requirements of the ANWR GROUP's Compliance Management System (CMS) is our expectation for all employees in all companies of the ANWR GROUP. It is supported by needs-based training.

Mainhausen, March 7, 2025

A handwritten signature in blue ink, appearing to read "Frank Schuffelen".

Frank Schuffelen  
CEO  
ANWR GROUP eG

A handwritten signature in blue ink, appearing to read "Dr. Hans-Ulrich Westhausen".

Dr. Hans-Ulrich Westhausen  
Compliance Officer  
ANWR GROUP eG

# About our „Code of Conduct“

The “Code of Conduct” is an expression of our mission statement and our shared values.

It provides us with a clear target image of how we exemplify our values through our behavior on a daily basis and thus ensure our corporate success in the long term.

With this in mind, all employees of the ANWR GROUP are obliged to comply with this “Code of Conduct”.

## This is what we stand for

The ANWR GROUP's "Code of Conduct" focuses on the following areas::

- Ethics and integrity
- Human and employee rights
- Sustainability
- Dealing with information
- Protection of company property

Information on "Implementation" and "Contact persons" round off the "Code of Conduct".

This "Code of Conduct" reflects our expectations of all employees, managers and members of the Executive Board and management, as well as our dealers, suppliers and other contractual partners.

Specific rules and regulations for individual situations and circumstances in the professional environment are clearly formulated in corresponding guidelines and agreements. These are binding for all employees and can therefore be sanctioned.

# 1. Ethics and integrity

## **1.1 Compliance with law and order**

For the ANWR GROUP, compliance with laws and regulations is the fundamental principle of economically responsible action..

All employees observe the applicable legal prohibitions and obligations at all times, even if this entails economic disadvantages or difficulties for the company or individuals.

## **1.2 Avoidance of conflicts of interest**

In the ANWR GROUP, business decisions are made in the interests of the company, taking into account stakeholders and sustainability criteria.

Conflicts of interest with private interests or other economic or other activities, including those of relatives or other related persons or organizations, should be avoided from the outset. If they nevertheless arise, they must be resolved in accordance with the law and the applicable guidelines and in consultation with the Compliance Officer and/or the Legal department. The prerequisite for this is the transparent, early and unsolicited disclosure of the conflict.

## **1.3 Fair competition**

The compliance commitment issued by the Management Board of ANWR GROUP eG is the benchmark for our actions in competition. Our high reputation and sustainable economic success in national and international competition have been based on this for many years.

Corruption and antitrust violations threaten these guarantors of success and are not tolerated. Bribes or cartel agreements are not a means for the ANWR GROUP to obtain a contract. Violations will not be tolerated and will result in sanctions against the persons concerned.

All employees are required to actively participate in the implementation of the ANWR GROUP's compliance requirements in their area of responsibility.

## **1.4 Money laundering and fraud prevention**

The ANWR GROUP complies with its legal obligations to prevent money laundering and fraud and does not participate in money laundering activities.

All employees are requested to have unusual financial transactions, in particular involving cash, which could give rise to suspicion of money laundering, checked by the responsible finance, legal, compliance or internal auditing department in case of doubt.

## **1.5 Political representation of interests**

The ANWR GROUP complies with the legal requirements for lobbying and avoids exerting unfair or inadmissible influence on politics and legislation at all costs.

## **1.6 Donations**

The ANWR GROUP sees itself as an active member of society and is therefore involved in various ways. The ANWR GROUP makes donations and other forms of social commitment in the regional and international environment in order to create the greatest possible social benefit.

The ANWR GROUP does not make any financial contributions, in particular donations and sponsoring measures, to political parties or party-like organizations in Germany or abroad, individual elected officials or candidates for political office.

## **1.7 Appearance and communication in public**

The ANWR GROUP respects the right to freedom of expression and the protection of personal rights and privacy.

All employees should be aware that they can also be perceived as part of and representing the ANWR GROUP in their private lives. They are therefore required to uphold the image and reputation of the company through their conduct and appearance in public, especially in relation to the media.

In the case of private statements of opinion, all employees must ensure that their own function or activity in the ANWR Group is not linked to the private statement.

## 2. Human and employee rights

## **2.1 Human rights**

The ANWR GROUP respects human dignity and respects internationally recognized human rights, in particular the “Universal Declaration of Human Rights” of the United Nations, the “European Convention for the Protection of Human Rights and Fundamental Freedoms” and the core labor standards of the International Labor Organization\*.

## **2.2 Equal treatment and non-discrimination**

A culture of equal opportunities, diversity, mutual trust and mutual respect is of great importance to the ANWR GROUP.

Equal opportunities are promoted and any form of discrimination or other unjustified unequal treatment in employment is rejected.

All employees are treated equally, regardless of gender, age, skin color, culture, ethnic origin, sexual identity, disability, religious affiliation, political opinion or ideology.

## **2.3 Forced and child labor**

We strictly reject all forms of forced, compulsory and child labor as well as modern slavery and human trafficking.

## **2.4 Freedom of association**

The ANWR GROUP recognizes the right of all employees to freedom of association, freedom of assembly and the right to form trade unions and employee representative bodies on a democratic basis.

\* Cf. ILO Conventions No. 29, 87, 98, 100, 105, 111, 138 and 182; Protocol to ILO Convention No. 29 and International Covenant of the United Nations of 19.12.1966 and ILO Conventions No. 1, 11, 26, 131, 141, 155, 159, 183 and 184.

## **2.5 Remuneration**

The right to appropriate remuneration is recognized for all employees. Remuneration and other benefits correspond at least to the respective national and local legal standards or the level of the national economic sectors/industries and regions.

## **2.6 Cooperation with employee representatives**

For the ANWR GROUP, close and trusting cooperation with employee representatives is a key component and cornerstone of corporate policy.

The basis of mutual trust and cooperative cooperation is an open and constructive dialog characterized by mutual respect.

## **2.7 Occupational health and safety**

The health and safety of our employees is an equally important corporate objective alongside the quality of our products and services and our economic success.

Occupational health and safety are an integral part of all operational processes and are included in all technical, economic and social considerations.

All employees promote health and safety in their working environment and comply with health and safety regulations

All managers are obliged to instruct and support their employees in fulfilling this responsibility.



3. Sustainability

### **3.1 Sustainable corporate governance**

The ANWR GROUP strives for sustainable corporate management in all areas. The three dimensions of sustainability - ecological, social and economic - are taken into account. In this way, the ANWR GROUP aims to live up to its understanding of sustainability as a world “compatible for grandchildren”.

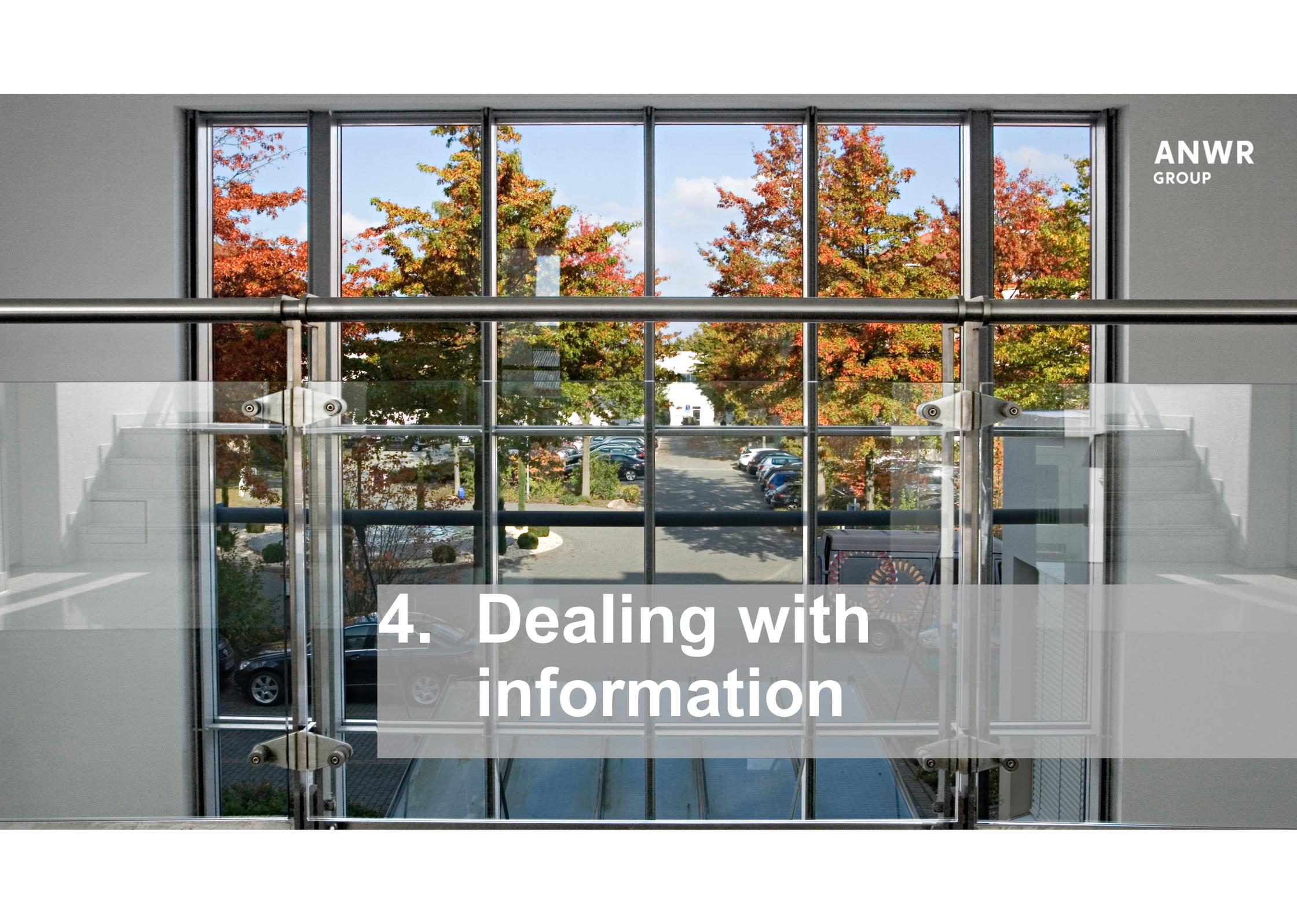
According to this, sustainable management leads to the fulfillment of the needs of the current generation without endangering the future viability of subsequent generations.

In addition to our understanding of human and employee rights, environmental and climate protection and resource efficiency are also important corporate goals for us.

When developing new and further developing existing products and services, the ANWR GROUP wants to ensure that all resulting effects on the environment and climate are kept to a minimum. This should be the benchmark for all business activities.

All employees have a responsibility to treat resources with care and to contribute to the protection of the environment and climate through their individual behavior. If the ANWR Group comes into contact with the animal and plant world in its business activities (e.g. supply chains), their protection is the maxim of our actions.

# 4. Dealing with information



## **4.1 Reporting**

The ANWR GROUP attaches great importance to open and truthful reporting and communication on the company's business transactions to shareholders, employees, customers, business partners, the public in general and government institutions.

All employees ensure that both internal and external reports, records and other documents of the ANWR GROUP comply with the applicable legal regulations and standards and are therefore always complete and correct, as well as timely and system-compliant.

## **4.2 Confidential information**

In the ANWR GROUP, confidential information and business documents are suitably protected from access and inspection by employees not involved and other third parties.

## **4.3 Data protection and information security**

The protection of personal data of employees, customers, suppliers and business partners is of particular importance to the ANWR GROUP.

In principle, no personal data is collected or processed in and by the ANWR GROUP without legal permission or the consent of the data subject.

Details on data protection and information security in the ANWR GROUP are regulated in the internal guidelines.



## 5. Protection of company property

Employees use the property and resources of the ANWR GROUP appropriately. They protect the company's assets from loss, theft or misuse.

Tangible and intangible property of the ANWR GROUP is used exclusively for company purposes and not for personal purposes, unless expressly permitted.

The type and scope of business trips are always proportionate to the purpose of the trip and are in line with time and cost aspects.

# WECHSELZONE



## 6. Implementation and contact persons

ANWR GROUP eG, including all subsidiaries, actively promotes the communication of the “Code of Conduct” and the other compliance requirements within the ANWR GROUP. The managers of the ANWR GROUP have a special role model function and are measured against the “Code of Conduct” in their actions. They are the first point of contact for questions regarding understanding and ensure that all employees know and understand the “Code of Conduct”.

For further questions about the “Code of Conduct” or other compliance issues, all employees and third parties (customers, suppliers, etc.) can contact the Compliance Officer, whose contact details are permanently available on the ANWR GROUP intranet and website.

The ANWR GROUP does not tolerate any violations of the law or fraud. We see it as a matter of course to uncover any kind of violations and to sanction them accordingly. All relevant information on the existing internal and external whistleblower system is available on the intranet and on the ANWR GROUP website.

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