



ANTI- CORRUPTION POLICY

MYTY



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1. Introduction

Our success is based on our impeccable reputation, and even the appearance of possible undue influence on business partners or public officials can have lasting negative consequences for the MYTY Group. Employees of the MYTY Group are called upon to further improve this reputation and thus contribute to the group's success.

This policy establishes – among other things – the framework for dealing with handouts such as gifts, hospitality, and other benefits of all kinds to comply with applicable anti-bribery and anti-corruption laws.

2. Scope and applicability

This policy applies to all executives, board members, apprentices, interns and permanent or temporary employees of the MYTY Group (Holding and operating entities) without geographic restriction.

MYTY's Compliance Officer is responsible for monitoring the enforcement of this policy, monitoring its application and effectiveness, and reporting on such matters to the group for preventing corruption and bribery.

The following provisions apply to the offering or acceptance of handouts between employees of the MYTY Group and business partners, customers, suppliers, public officials and other third parties that unjustifiably promote the business activities of the parties involved. Country-specific legal regulations that deviate from the guidelines listed in this policy always take precedence if they are stricter.



3. Professional handling of handouts

The MYTY Group expressly opposes unfair acts and all forms of corruption or bribery. In criminal law, bribery is considered a criminal offense when someone gives or offers an unlawful advantage to another person. Bribery and corruption are punishable for all parties involved, for both the persons and companies involved.

A handout must always be made with an appropriate intention. This is the case if the handout – such as an invitation to lunch – only expresses politeness, gratitude, or appreciation in a professional context. The higher the value of gifts and invitations, the more critical they are to be considered. In addition, these should be limited to sporadic opportunities. Frequent, especially unilateral handouts should be avoided, even if they remain in the marginal value range. Handouts must be consistently documented and clearly identified internally.

The following guidelines serve to deal with bribery-related handouts, which strengthen the integrity of the MYTY Group and protect business activities from criminal consequences, financial losses, and reputational damage. Handouts include all tangible and intangible assets, in particular all types of gifts (money and equivalent means [cheques, loans, deferred payments]), gifts in kind, personal discounts and discounts that are not commonly used, invitations to cultural/sporting events, travel, favours, the use of facilities, drinks, meals, transportation, accommodation, promises of future employment and any kind of preferential treatment of business partners and relatives.

3.1. Gifts

Offering or accepting gifts is permitted if all of the following questions can be answered with "yes":



- a) Is there a special occasion (e.g., a milestone birthday, a business anniversary or a wedding)?
- b) Is the value limit of EUR 50 not exceeded?
- c) Is such a gift common in our business environment?
- d) Is it ensured that the gift is not granted in connection with a business transaction?
- e) Is it ensured that the gift does not violate internal guidelines in the recipient's company?

Exceptions are possible if the gift was granted in exceptional circumstances that make it safe or necessary to accept it, e.g., due to cultural peculiarities.

Gifts are always inadmissible if:

- a) the business partner is or can be influenced by the gift; or
- b) if it is a gift of money (even if it is declared as a donation).

3.2. Invitations

Offering or accepting an invitation to a meal or cultural/sporting event is permitted if all of the following questions can be answered with "yes":

- a) Is there a business reason for the invitation?
- b) Is the value limit of EUR 250 (e.g., total cost per person for a party) not exceeded?
- c) Is the supervisor fully informed about the frequency and reasons for the invitation?
- d) After the invitation has been extended to the business partner
 - i) Is there any proof of the reason for the invitation?
 - ii) Are the names of the invited business partners documented?
 - iii) Is a receipt for the cost of entertainment sent to the accounting



department?

- e) Is the correct taxation ensured, usually by the inviting party?
- f) Is such an invitation common in our business environment?
- g) Is it ensured that the invitation does not violate internal guidelines in the recipient's company?

Invitations are always inadmissible if:

- a) the business partner is or can be influenced by them; or
- b) includes spouses or partners

Exceptions are possible if such an occasion is usually accompanied by the spouse or partner of the guests, e.g., charity events, etc. When carrying out customer events, attention must be paid to correct taxation.

3.3. Travel and accommodation

It may be permissible to invite business partners to a trip or be invited by them if all of the following questions can be answered with "yes":

- a) Are at least two-thirds of the travel programme related to the business activities of the MYTY Group?
- b) Was a detailed schedule submitted to the respective supervisor in advance for approval?
- c) Is there a specific business reason why
 - i) this specific objective has been selected; and
 - ii) the invitation was addressed to the person in questions?
- d) Are the names of all participants documented?
- e) Is it ensured that no monetary payments are made to invited persons (e.g.,



expense allowances)?

3.4. Exceeding the value limits

If one of the value limits for gifts and invitations listed under 3.1 and 3.2 is exceeded, prior approval must be obtained from the management or the relevant board of directors.

4. Facilitation payments

Offering, performing, paying, or receiving "facilitation payments" is always prohibited. Facilitation payments are unofficial payments to promote, expedite or limit the performance of an existing duty or other routine, non-discretionary task.

These facilitation payments are often paid to civil servants to obtain permits or official documents, process government papers, or provide services such as police protection, utilities, or customs clearance.

5. Special requirements for officials

Invitations or gifts to public officials are not permitted. For the purposes of this policy, public officials are:

- Persons at home and abroad who are in an employment relationship under public law, in particular civil servants and employees of the public service, regardless of the type of activity performed. Employees of an undertaking organised under private law may be public officials if a public body holds a majority stake in that undertaking or if the undertaking is entrusted with the performance of public



service tasks.

- Deputies
 - Members of state governments
 - Judges
 - Soldiers
 - Public officials or employees of public international organisations such as the UN or the WTO or supranational organisations such as the European Union, the European Atomic Energy Community, the Andean Community or Mercosur
 - Candidates for political office, political office holders, party members, party officials and political parties themselves
 - Representatives of the press, if they work for a public service broadcaster, as far as local law further defines the concept of public official, this local law shall prevail.
- If there is doubt concerning whether a person is a public official within the meaning of this definition or not, every employee is obliged to ask the management.

6. Associated persons

Any type of agent, intermediary, contractor, consultant or joint venture partner (each an "associated person") is an individual or company acting for or on behalf of the MYTY Group in any capacity. Most anti-bribery and anti-corruption laws hold companies accountable for the actions of their associated persons. Therefore, it is not possible to escape liability by allowing an associated person to pay or accept bribes. Therefore, all representatives of the MYTY Group must ensure that all associated persons acting for or on behalf of the MYTY Group are appropriately selected and screened.

6.1. Checklist for the retention of associated persons

- i. Who is the associated person?



Clarify the identity of the associated person. In case of any concerns a so-called "3rd party check". should be performed..

- ii. Can I trust an associated person to act in accordance with laws and regulations?
The integrity of an associated person is the foundation of a long-standing and prosperous business relationship. Therefore, you should not assume that an associated person is not acting in accordance with laws and regulations in general. If you suspect that the associated person is not acting in accordance with the laws and guide- lines, you should contact the Compliance Officer directly or using the compliance@myty.com email address and further investigate the relevant facts. Such suspicion may be expressed by other persons or third parties as well as yourself based on your own perception. If possible, check whether the suspicion expressed by another person, or a third party was unjustified before taking further action.

If another person or third party raises suspicion against an associated person, the background of that person or third party should also be checked. If the person or third party expressing such a suspicion is a competitor of the associated person, the suspicion itself could be based on unfair or false allegations. In such a case, you should always contact the Compliance Officers directly or via the whistleblower process (see Section 10).

- iii. Is there proper contractual documentation for the payment of remuneration to an associated person? Is the remuneration for the services provided adequate?
The MYTY Group expects all payments to be based on proper documentation and that all re- munerat ion is agreed based on market standards and arm's length principles. You must verify the existence of such an agreement before initiating payments to the associated person.

When determining the associated person's usual fee for a particular service that they are expected to provide, you can review publicly available statistics for the relevant market and industry. Relevant factors are:



- The level of competence of the associated person
- The service to be provided
- The timetable for the timely provision of the service
- The liability risk of the associated person in the provision of the services
- The existence of alternative providers for the services requested by the associated person

7. Business partner audit (3rd party check)

In case of unknown customers, suppliers and any other business partners and if any concerns relating the below mentioned topics might exist a so called 3rd party check should be carried out. The need for a 3rd party check should be addressed to the centralised compliance team of MYTY Group.

Checks concern topics such as:

Structure of the company

- Opaque corporate ownership
- Offshore structures
- Non-traceable shareholdings
- Start-ups for non-business purposes

Shareholders and officers

- CV inconsistencies, conflicts of interest
- Politically exposed persons (PEPs) or relationships with state-owned companies (SOCs)



- Relationship with questionable joint venture partners or in the supply chain
- Role as intermediaries, heavy dependence on intermediaries

Reputation of the business partner

- Entry in international sanctions, blacklists or watch lists
- Legal proceedings/convictions related to bribery or corruption
- Official investigations by supervisory authorities for bribery or corruption
- Media reports about involvement in bribery, corruption, or dubious practices
- Does the company have an anti-corruption policy and is it published?

The 3rd party check might uncover "red flags" related to the organisation and structure of a company, its management, personnel and possibly the reputation of the previous company or its management that represented the person.

The term "red flag" includes warning signals of varying severity, triggered by either recognisable negative information or missing information about the business partner or a lack of transparency.

If one of the red flags described above is detected, any further business relationship with this counterparty is prohibited. The further continuation of the business relationship depends on the approval of the counterparty by the MYTY Group Executive Board, which is addressed by the Compliance Team.

8. Donations and sponsoring

The MYTY Group never awards handouts to charitable organisations ("donations") or sponsorships that are dependent on a purchase obligation of the recipient. Donations



or sponsorships may never be offered or granted in a manner or under conditions that jeopardise the independence of the recipient.

Donations or sponsoring also include services or products that are partly similar to donations because they are not fully offset by consideration (e.g., the granting of a product to a social institution at a discounted price). The aforementioned guidelines shall apply accordingly.

All donations or sponsorships must be transparent and traceable. It must be clear to whom the donations or sponsorships are made, who the final recipient of the payment is and the purpose for which the recipient uses it.

The following are prohibited:

- Donations, sponsorship and other support measures for politicians, political parties, or political organisations
- Donations to organisations focused on generating profit
- Donations or sponsorships inconsistent with the objectives of MYTY Group or that may cause harm to the MYTY Group

9. Infringements

Violations of laws preventing bribery or corruption can result in heavy fines and punishments up to several years in prison. Employees who attempt to influence business partners or public officials in an unfair manner by granting advantages will be held liable for the criminal consequences as well as the corresponding legal steps. Depending on the locally valid legal regulation, this can range from a warning to the termination of the employment relationship without notice.



Questions or suspicions/observations regarding violations of this policy should be directed to our Compliance Officer (see Section 10).

10. Contact details of the Compliance Officers

You can always reach our Compliance Team using the email address compliance@myty.com if you have any questions regarding this policy or compliance in general.

11. Review and update of the policy

This policy is regularly reviewed, adapted, and supplemented as part of the development of preventing and combating corruption.

Changes to this policy will take effect informally. Employees will be informed immediately and in an appropriate manner about the changed requirements.