

Policy

Gifts & Hospitality

deugro group is committed to doing business in a fair manner, with utmost honesty, integrity, and transparency. This commitment must be reflected in every aspect of our business conduct. Therefore, we strictly follow a zero-tolerance policy when it comes to bribery and corruption.

This Gifts & Hospitality Policy provides guidance for business related gifts and hospitality, to be given or received by deugro group employees. Additionally, this Policy applies to anyone acting on behalf of the deugro group including consultants, agents, brokers, subcontractors, and other representatives ("Stakeholders"). It is the responsibility of Employees and Stakeholders working for or on behalf of any deugro group entity around the world, to observe and comply with all applicable laws, the deugro group's Code of Ethics and Compliance, and this Policy in the performance of his/her duties.

Under certain circumstances, gifts and hospitality may be disguised bribes, or interpreted as such. It is therefore of paramount importance to be able to identify when gifts and hospitality are appropriate and genuine, and when they are not. A common-sense and practical approach is to be adopted in the interpretation of this Policy.

Appropriate and business-related gifts and hospitality are generally accepted by the group. In order to determine acceptability, each Employee and Stakeholder should ensure that the following criteria are met:

- **Made for the right reasons:** gifts and/or hospitality should be given as a sign of regard or appreciation and friendship, or in relation to the promotion of the group's business and services.
- **Infrequent:** gifts and/or hospitality are only occasional and not a regular occurrence between the giver and the recipient.
- **Reasonable:** gifts and/or hospitality do not exceed a nominal value and the overall costs associated with them are limited to reasonable expenses.
- **Made openly:** if made secretly then the purpose will be suspect. Business partners are always to be present for the duration of the meal/event.
- **No conflicts of interest:** extra caution has to be exercised when hospitality is offered during a tender process or where a possible conflict of interest could arise. In these circumstances any gifts and/or hospitality should not be offered and must be politely refused.
- **Appropriate:** the nature of the gifts and/or hospitality is in line with both general business practices and local cultural, ethical, and legal standards. Employees offering or accepting gifts/hospitality would feel comfortable discussing the matter with deugro group executives and their management.
- **No expectations or obligations:** gifts and/or hospitality offered or accepted are without expectation of any type of reciprocity.
- **No misuse of expenses:** payment or reimbursement of expenses shall not be used to hide inappropriate gifts and/or hospitality. All business courtesies must be recorded in the Gifts & Hospitality Registers, unless specifically exempted.

Specific guidance forming an integral part of this policy can be found here: **D-SOP-0086 Gifts and Hospitality**.

Failure to comply with this Policy will lead to disciplinary action, including potential dismissal or termination of a contract. Specific guidance is available in the associated Standard Operation Procedures.

This policy first took effect in January 2016 and is reviewed annually.

Klaus Strahmann
Co-CEO

Hanau, November 2025