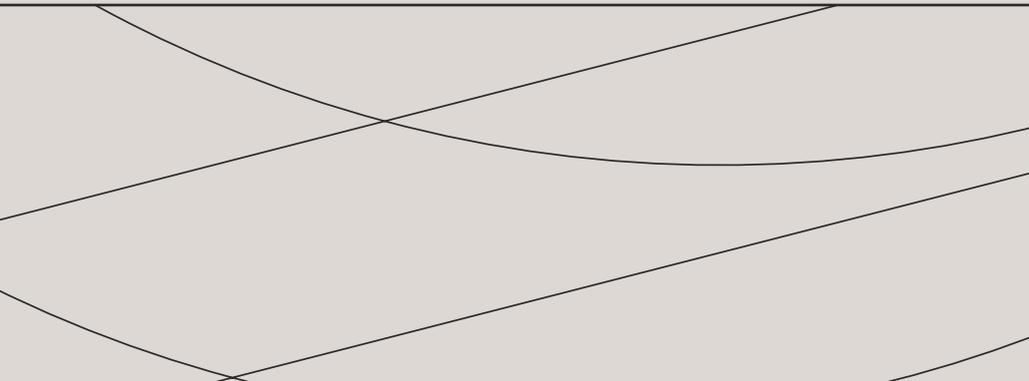

Guideline Anti-corruption



ARNO strictly rejects corruption!

Corruption in any form damages not only the reputation of our group of companies, but also every employee working for us. Corrupt behaviour can lead to considerable financial penalties and permanently damage a company's reputation. With these guidelines, we want to explain why corruption has no place in the ARNO Group. The ARNO Code of Conduct forms the basis of our employees' day-to-day work and is a binding guideline for action. The ARNO Anti-Corruption Guidelines show how our employees can recognise signals of corruption, avoid them and prevent dubious business relationships.

Active corruption (promises of benefits, bribery) or passive corruption (acceptance of benefits) are prohibited in the ARNO Group.

At ARNO, contracts are predominantly awarded in teams, which minimises the risk of corruption as far as possible. We expect our business partners to respect and implement the statutory anti-corruption laws of their countries. We regard any form of non-compliance as a criminal offence.

You can report compliance violations via our homepage. Additional information can be found on the last page of this guide. If you have any questions about the anti-corruption guidelines, you can contact us on +49 (0) 7022 5001 0. We will be happy to support you.

Phases of corruption

Transitions from correct behaviour to corruptive behaviour are often fluid.

- › **Feeding phase**
In this phase, potential business partners receive favours without any specific consideration being demanded in return. The corrupter explores the needs..
- › **Compression phase**
The recipient feels obliged to show gratitude as a result of the gift. The corrupter expects something in return.
- › **Skimming phase**
The corrupter exploits the unlawful behaviour of the recipient to make further demands. Victims become perpetrators.

ARNO rules for combating corruption

- › The merging of private interests with the interests of the ARNO Group must be avoided,
- › Business relationships are only permitted with a written contract,
- › Non-transparent clauses in contracts must be avoided,
- › Orders are to be awarded as a team, taking into account the release clauses,
- › Payment instructions are only to be issued after official invoice verification,
- › Cash payments are not permitted
- › Third parties must be able to understand decisions based on neutral criteria.

ARNO pursues a holistic compliance approach

› Training

Our employees receive annual training on the ARNO Code of Conduct and ARNO Anti-Corruption Guidelines.

› Supplier Management

Before entering into a business relationship, we carry out a supplier analysis in four phases. In addition to general topics (quality, service, etc.), checks are carried out on compliance with labour and human rights (SA 8000, ISO 26000, etc.), the quality and environmental management systems (ISO 9001, ISO 14001) and occupational health and safety (ISO 45001). Supplier audits are carried out as required.

Donations and Sponsoring

ARNO supports international and regional organisations worldwide. Through our commitment, we want to strengthen charitable organisations and live up to our self-image of social and societal responsibility.

Donation and sponsorship partners can be found in our current sustainability report.

Anti-corruption - Whistleblowing/ Whistleblower Protection Act (WPA)

Our whistleblower software is available to whistleblowers:

<https://whistleblowersoftware.com/secure/arnogroup>

Whistleblower Software

- › Whistleblowers can report compliance violations (concerns, complaints) anonymously.
- › Voice distortion software is used for voice recording.
- › Whistleblowers can choose to whom the report is addressed. There are three people to choose from.
- › End-to-end encryption is guaranteed,
- › Whistleblowers receive feedback no later than 7 days after submitting the offence.
- › Our whistleblower software is ISO 27001 certified and ISAE 3000 audited.
- › If necessary, government agencies are involved.et.

Creating Instore Success. Together.