

*Anti-Corruption
Policy*

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Corruption prevention at Instone

Instone will not tolerate corruption under any circumstances, neither on the part of business partners or third parties nor on the part of our employees. Incidents of corruption are consistently pursued without exception in order to protect our employees and our company. Every Instone employee is strictly prohibited from corruption in any form, from bribery and corruption to taking and granting advantages.

Corruption occurs in the granting of benefits to which the recipient is not entitled and on the basis of which he or she becomes or could become dependent. Instone understands the concept of gifts broadly, according to which they can consist of any material or immaterial advantage. These include, for example, cash donations or the discharge of debts as well as the surrender of valuables. Invitations to cultural, sports or other events, trips or (business) meals, services of any kind, discounts and similar things of value can be classified as benefits relevant from the point of view of corruption.

When the acceptance of such benefits is permitted, Instone has stipulated in a company guideline to be observed by our employees in which the following, Instone-wide principles for the prevention of corruption are specified:

- The business and private interests of our employees must be strictly separated (**principle of separation**)
- Donations may not be granted or accepted in secret (**principle of transparency**)
- Benefits that exceed the tax exemption limit of currently EUR 35 p.a. must be fully documented and reported to the compliance officer (**documentation principle**)
- In all business transactions, it must be ensured that performance and consideration are in an appropriate relationship in terms of value (**principle of equivalence**).

Contributions to employees

In general, extreme restraint is required when accepting and granting benefits. None of our employees may accept gifts or offer or grant

benefits to a business partner or third party if, after careful examination, this could influence a business decision.

The acceptance of money as well as the demand of gifts or other advantages for oneself or close people are always prohibited.

Our business partners are informed about the applicable corruption prohibitions via our Code of Conduct for contractual partners and are obliged to observe them themselves and to ensure that the corruption prohibitions are also observed by their employees.

Contributions to business partners

Donations to our business partners are only permitted in compliance with the stipulations of the company guidelines, which must be observed, and the rules and statutory provisions established by the business partner. Permitted benefits must always be designed in such a way that the impression of undue influence is excluded. Any connection with business activities is prohibited without exception.

In all cases of doubt, approval must be obtained from the compliance officer before the offer or acceptance of a benefit.

Contributions to public officials

Particular restraint applies to public officials and public employees. As a matter of principle, our employees are prohibited from granting a gift, even small favors or a "thank you" for performing an official act.

Facilitation payments

The same applies to prohibited facilitation payments of any kind and to any target group. These are neither made nor accepted by Instone and are also subject to the absolute prohibition of corruption.

Violations of the prohibition of corruption

Violations of the absolute prohibition of corruption are not tolerated and are regularly punished with termination of the employment relationship. In addition, there is a risk of criminal law consequences from state authorities and courts (fines, imprisonment) over which Instone has no influence.