



Anti-discrimination directive

July 24

Anti-discrimination policy of the Adler Group



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Responsible department	Compliance & Risk Management/Human Resources
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1. Scope of application

This anti-discrimination policy applies to all employees of the companies covered by the scope (page 2) of this policy, including the Executive Board and the management of the subsidiaries.

The aim of this policy is to protect against and reduce potential discrimination within the Adler Group. It is based on the provisions of the German General Equal Treatment Act (AGG).

Any form of discrimination, in particular racist, ethnic, anti-Semitic and anti-Muslim discrimination as well as discrimination based on gender, gender and sexual identities and ascribed or assumed or actual characteristics such as age, religion or ideology, disability, social origin or social status and other social stigmatization must be prevented or eliminated.

All provisions of these guidelines are binding unless statutory provisions take precedence over them. Deviations from the regulations in this guideline are only permitted with the prior approval of the Executive Board of the Adler Group, unless they are legal requirements. Since not all specific issues can be dealt with in this policy, the regulations in this policy are supplemented and concretized by further guidelines, work instructions and process descriptions and are continuously developed.

The result, i.e. the effect of a decision or action, is decisive for the classification of an action or conduct as discrimination, not the intention that led to this effect.

The definitions of discrimination given in this directive take account of the fact that people have multiple affiliations and can experience different attributions. They can therefore also be affected by the interaction of different dimensions of discrimination.

2. *General basic values of our cooperation*



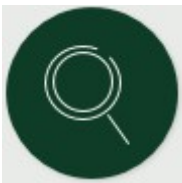
In addition to complying with laws and other regulations, the Adler Group expects its employees to act with integrity, honesty and loyalty in their professional activities within the company and in all situations related to these activities. With this behavior, we stand up for what is anchored in our values.

We can only achieve our goals as a team.



Common goals and a strong team spirit are prerequisites for successful cooperation. Our cooperation is characterized by respect, trust and appreciation. Every employee takes responsibility for their own actions and contributes to a working environment in which our ambitious goals can be achieved. The Adler Group creates a motivating working environment for this.

We are committed to integrity and transparency.



The Adler Group's value-oriented corporate governance is based on integrity. We are committed to complying with legal requirements and internal guidelines. Our communication is characterized by transparency, timeliness and openness. The equal treatment of all company employees is a building block of our credibility.

3. *Important Individual regulations*

3.1 Fair Employment

The Adler Group is committed to fair employment conditions and rejects undeclared work, forced labor and other illegal employment of employees. Degrading illegal employment relationships can also jeopardize legal jobs and prevent the creation of new legal jobs.

The protection of children is an essential anchor of international human rights. The Adler Group is committed to these fundamental rights and categorically rejects any form of child labor.

The Adler Group's employees can only provide the services required of them in a safe working environment. The Adler Group ensures that the necessary measures are taken to protect them. This also includes a strict ban on the misuse of addictive substances. Every employee of the Adler Group is obliged to comply with the regulations on occupational health and safety.

The Adler Group promotes opportunities for the professional and personal development of employees as well as the open exchange of opinions in the form of constructive criticism and new ideas.

The Adler Group is fundamentally committed to the core labor standards of the International Labor Organization (ILO) and strives to comply with them, particularly with regard to anti-discrimination and equal opportunities within the company and throughout its value chain.

3.2 Against discrimination - for equal opportunities, equal treatment and mutual respect

Our employees are the basis and source of the Adler Group's business success. We recognize the principles of respectful, fair and loyal interaction with one another. The principles of equal opportunities, equal treatment and mutual respect play a particularly important role here. All employees are offered equal opportunities when they are hired and during their further employment with the Adler Group.

The Adler Group rejects all forms of harassment, discrimination and disadvantage and takes action against them. No one may be subjected to racism or

- ethnic origin
- the social origin
- of the sex
- religion or belief
- physical or mental abilities
- of age
- sexual or gender identity

are disadvantaged, disregarded or harassed.

We do not tolerate discrimination, i.e. disadvantaging or degrading groups or individuals on the basis of their personal characteristics. This applies both to individual discriminatory actions by individuals and to discrimination on a structural level. We expect our employees to treat each other and their business partners with tolerance, courtesy, respect and fairness, thereby contributing to a productive and pleasant working and business environment. Every employee is obliged to respect the personal sphere of others.

respect. Furthermore, the company management will always work to ensure that structural discrimination has no place in the company.

Sexual harassment, including sexualized violence, stalking, bullying and the exploitation of dependency relationships in the workplace are prohibited in any form and are subject to criminal prosecution depending on the severity of the incident.

3.3 Responsibility of managers

Managers promote a working environment in which questions are asked directly and concerns are expressed openly, and are available to their employees as trustworthy contacts. To this end, they must receive appropriate training from the relevant specialist departments. For their part, managers are required to provide regular training in their area/department. These are supplemented by mandatory instructions during the onboarding of employees. The company's anti-discrimination policy is also coordinated with and regularly reviewed by the company management.

3.4 Notifications of violations

If employees of the Adler Group are exposed to a violation of this policy, we appeal to affected employees to report this. Supervisors and/or the responsible management and/or the Chief Compliance Officer or colleagues in the Adler Group Compliance Department as well as divisional management and the AGG Officer in the Human Resources Department are available for this purpose. If there is a local works council, this is also available.

In addition, both divisions maintain specialist mailboxes that can be contacted. Finally, the Adler Group's whistleblower system is also available for reports.

3.5 Employees' rights and consequences of violations

According to the General Equal Treatment Act ('AGG'), employees have the right to lodge a complaint in the event of perceived discrimination and, if applicable, the right to refuse performance if the employer takes no or obviously inappropriate measures to remedy harassment or sexual harassment in the workplace. If a breach of the prohibition of discrimination under the AGG is established, the employer is obliged to compensate the resulting damage if it is responsible for the breach of duty.

Internal investigations or negative press coverage due to violations of applicable law or other regulations can also have a lasting negative impact on reputation and therefore on business operations.

In the event of discrimination within the meaning of this policy, the appropriate, necessary and reasonable measures must be taken in each individual case to protect the person concerned. Depending on the severity and nature of the violation, violations of the Anti-Discrimination Directive will therefore result in consequences under labor law and, if applicable, under civil and criminal law for the Adler Group employees involved.

4. Contact persons

The colleagues in the Adler Group's Compliance department are - in addition to the respective managers - the responsible internal contacts for all fundamental questions relating to compliance and internal regulations.

In addition, the colleagues in Human Resources, in particular the AGG Officer, are the contact persons for HR compliance.

You can reach the above-mentioned contact persons using the following contact details:

Thomas Urbanczyk, Head of Compliance & Risk Management, t.urbanczyk@adler-group.com Maria

Schirmer, AGG Officer;

Responsible for inquiries relating to the General Equal Treatment Act (AGG)

agg@adler-group.com

General service addresses:

compliance@adler-group.com

personal-service@adler-group.com

Author:

Adler Group

CRM and Human Resources

compliance@adler-group.com

personal-service@adler-group.com