

ANTI- CORRUPTION POLICY

CLASSEN GROUP | CLASSEN COMPLIANCE

Kaisersesch, January 2026

PREAMBLE

The CLASSEN Group operates a zero-tolerance policy towards corruption and bribery. We are committed to complying with the highest standards in our global business activities. We do not tolerate corruption in any form whatsoever. Any granting or acceptance of benefits, incentives, preferential treatment or other advantages is strictly prohibited. We compete fairly on the basis of our quality and our prices. The fundamental principles regarding the handling of corruption and bribery set out in the Code of Conduct of the CLASSEN Group are specified and further detailed by this policy.

PURPOSE

The CLASSEN Group is committed to the highest levels of integrity, transparency and ethical business conduct. This Anti-Corruption Policy defines binding principles and rules of conduct aimed at preventing corruption and bribery. Its objective is to ensure that all employees, business partners and suppliers act in accordance with the highest ethical standards.

By implementing this policy, we seek to prevent corrupt behaviour, promote transparency and integrity in all business processes, and maintain the trust of our employees, customers and business partners. This policy also helps to minimise legal risks and strengthens our corporate responsibility as a sustainable and responsible company.

SCOPE OF APPLICATION

This Anti-Corruption Policy applies to all employees, managers and business units of the CLASSEN Group worldwide. It also extends to business partners, suppliers and all third parties who are engaged in a business relationship with our company.

1. PRINCIPLE OF ZERO TOLERANCE

The CLASSEN Group pursues a strict zero-tolerance policy towards corruption and bribery. Any form of corruption, whether committed by employees, business partners or third parties, will not be tolerated. Corrupt behaviour damages the company, jeopardises our business relationships and may result in serious legal consequences. All employees and business partners are therefore obliged to comply with the principles set out in this policy.

2. RULES OF CONDUCT

Employees are prohibited from accepting, requesting or offering bribes or any improper advantages. The acceptance of gifts, invitations or other benefits is permitted only in accordance with applicable company policies and must not influence business decisions. Any payments or other transactions intended to influence business decisions or to obtain an improper advantage are prohibited.

Compliance with all legal and internal requirements must be ensured. Suspected activities or violations of this policy must be reported immediately.

3. TRANSPARENCY AND DOCUMENTATION

All business activities must be fully and transparently documented. Payments and other transactions must be traceable and carried out in accordance with applicable legal requirements and our internal policies.

4. TRAINING AND AWARENESS

The CLASSEN Group provides regular training on the prevention of corruption. These training sessions are primarily aimed at employees working in sales, purchasing, marketing, sales promotion, as well as senior management. The purpose of this training is to raise awareness of corruption risks, provide participants with practical guidance, and clarify their responsibilities in accordance with company policies.

5. REPORTING OBLIGATIONS AND WHISTLEBLOWING

We encourage all employees to report any form of corruption, bribery or unethical behaviour. For this purpose, an anonymous whistleblowing hotline is available. All reports are treated confidentially and investigated thoroughly. No individual will suffer any disadvantage or penalty as a result of making a report in good faith.

6. CONSEQUENCES OF VIOLATIONS

Violations of this Anti-Corruption Policy will result in serious consequences. Depending on the severity of the misconduct, this may include disciplinary action under employment law, including a formal warning or termination of employment, as well as criminal proceedings. The same applies to business partners who fail to comply with the requirements of this policy.

CONCLUSION

The CLASSEN Group is committed to upholding the highest ethical standards and to actively combating corruption and bribery. The implementation of this policy is essential to safeguarding our integrity, minimising risks and strengthening the trust of our business partners, customers and employees. All parties involved are called upon to actively support and adhere to these principles.

Thank you for your cooperation.

For any queries, please contact us in writing at: julie.quervel@classen.de

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