



Anti-Corruption Policy at msg group

Group Compliance

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1 Introduction

The companies of the msg group of companies (hereinafter referred to as "msg") are subject to a variety of national and other country-specific anti-corruption provisions, standards, regulations and laws as part of their business activities and in different jurisdictions in which msg does business.

We expect all employees of the msg group of companies to know and observe this policy. We act in accordance with the associated procedures, which promote and ensure compliance with all relevant and applicable anti-corruption requirements for msg throughout our group of companies.

If you have any questions or uncertainties, please contact compliance@msg.group.

2 Scope of application

This policy applies to the management, executives, permanent employees, interns, trainees, dual and working students as well as freelance employees of the companies of the msg group of companies over which msg exercises operational control ("affiliated companies").

For the sake of simplicity, those covered by the personal scope of application of this policy are hereinafter called "msg employees".

If individual entities of msg have issued own regulations on the subject of corruption prevention, the contents of this policy here are to be regarded as a minimum requirement for the regulations therein. If local law or a business unit within the msg group imposes stricter requirements than those published here, these stricter regulations must also be complied with accordingly.

3 Our principles

The msg is committed to conducting its business in accordance with ethical principles. Our rule is simple: we never pay bribes or act corruptly in any other way. We also never instigate a third party to do so on our behalf. This commitment is a key element of our msg Compliance Management System and reflects the way we see ourselves in our business dealings.

To promote and support this obligation as well as to protect the reputation of the msg group of companies and to ensure our long-term success, every msg employee must understand the following principles in addition to the Code of Conduct and comply with them in his/her working environment.

msg employees

- do not authorize, offer, promise or grant anything of value - especially bribes - to obtain business for msg or to gain an advantage for themselves or msg in connection with msg's business. Do not solicit or accept bribes, unauthorized kickbacks or other improper benefits,
- must not, under any circumstances, make acceleration payments to administrative or government officials to expedite routine administrative procedures.
- pay attention to the special risks and restrictions that apply to gifts and hospitality, especially when it comes to public officials. Gifts, favours, hospitality or other benefits may only be granted or accepted by msg employees if they comply with local applicable legislation and practice and are not of an unreasonably high value,
- record their working time, travel and expense reports, financial reports, invoices, donations and sponsoring activities and other records correctly, completely and accurately. All required company documentation, controls and records must accurately and completely reflect business transactions,
- do not promise or offer employment to relatives of a business partner or public official in order to improperly influence their decisions or decision-making processes. msg employees follow the central recruiting processes and guidelines, which ensure that only qualified candidates are hired and that potential personal conflicts of interest are made transparent. A conflict of interest exists when an employee's private interests collide with msg's business interests. msg employees may not participate in msg's business activities if they could be influenced by personal relationships that are, could be or could be interpreted as an obstacle to objective decision-making. Private and business matters must therefore be kept strictly separate,
- never allow third parties to act on our behalf in a manner that violates applicable laws, mandatory standards or our own policies,
- look out for facts or circumstances that suggest that the third party might act inappropriately before entering into a contractual business relationship with a third party.
- are aware that donations and sponsoring activities can pose a risk of corruption if they are used to influence a decision-maker in connection with msg business. msg employees therefore observe the internal procedures and requirements of the [msg Group's donation policy](#) before making a donation for charitable purposes on behalf of msg,
- ensure that an appropriate anti-corruption due diligence is enforced prior to the completion of any acquisition activities (M&A process), before a merger, partnership, joint venture agreement or entry into a new market is completed. msg employees observe our generally applicable process policies in this regard „[Investment Management integrated M&A process](#)“.

4 Sanctions

In the area of corruption and bribery, msg is exposed to the risk of high fines, civil liability, reputational damage and contractual penalties as well as exclusion from public and private procurement procedures. Therefore, a breach of this policy or any relevant and applicable anti-corruption laws may result in disciplinary measures (warning, dismissal) in addition to possible own personal criminal and civil consequences.

msg will not tolerate or take any retaliatory measures against persons who in good faith provide evidence of such a violation or other misconduct, e.g. violations of the msg Code of Conduct, this policy or other msg directives.

The [msg whistleblower system](#) is available to all employees of the msg group of companies to report possible violations.