

## Code of Conduct

The trust of our employees, customers, business partners and the public is the basis for our economic success. However, a single individual can damage the good reputation of the CECONOMY AG, if acting inappropriately.

Our Code of Conduct, which is mandatory for all employees, executives and the members of the management board, therefore defines clear rules for the daily work. This way we ensure that we act with integrity, meaning compliant and ethically behaviour, at all times. That we act responsible. And that we create transparency.

To avert damage from our company we need the help of every individual. Contact your supervisor or the Compliance Officer if you observe misconduct or if you are unsure how to assess a given situation. Alternatively you can anonymously use the whistle-blower system.

### **1. We make a distinction between business and personal interests.**

As an employee we represent the CECONOMY AG and its interests. We make business decisions exclusively in the interest of the company – and we never pursue a personal advantage. Potential conflicts or blending of personal and business interest are to be avoided.

### **2. We do not offer or request inappropriate advantages.**

We do not offer an inappropriate advantage to anyone or allow that such is granted – even if it is not connected to a business decision. Any appearance of corruptive behaviour is to be avoided. Particular precaution has to be taken regarding gifts: cash payments or cash equivalent gifts are a no-go.

### **3. We treat company information confidential.**

We do everything to protect confidential information and business secrets from third party access. This is particularly true for personal data. We collect, process and store personal data only based on consent or another legal basis. We process personal data in a transparent way, for legitimate, pre-defined purposes only and take appropriate measures to protect the data.

#### **4. We respect fair competition.**

Violations against antitrust law will not be tolerated (zero tolerance policy). That means, we never make unlawful agreements with competitors or suppliers. Unlawful exchange about antitrust relevant topics has to be avoided. We do not use confidential information about competitors or forward it to a third part.

#### **5. We treat everyone as equals.**

Diversity, equal opportunity and tolerance are basic principles of collaboration. For this reason we do not tolerate discrimination based on race, ethnic origin, religion, disability, age, sexual orientation, gender or beliefs. Every form of harassment, for example mobbing or sexual harassment, is prohibited.

#### **6. We are a fair employer.**

We respect international human rights and ensure fair working conditions. This comprises employees' rights to organise in unions and for a fair compensation. Furthermore, we observe the applicable labour law regulations for example regulations on working hours and the prohibition on forced and child labour.

#### **7. We respect the applicable law.**

We push our goals – but not at any price. Everything we do is based on applicable law and our company guidelines and standards. Even if it results in economic disadvantageous for CECONOMY AG or difficulties for individuals: unlawful directions by supervisors must not be followed but notified. To ensure compliance we familiarise ourselves with important laws and guidelines and keep up-to-date with changes.

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#### **Your contacts**

If you have questions or want to provide information about potential misconduct, please contact the CECONOMY AG Compliance organisation at any time.

#### **CECONOMY AG**

##### **Vera Thiemann**

Head of Competition&Antitrust, Compliance, Data Privacy