

Anti-Corruption Policy of the Amadeus Fire Group

This Anti-Corruption Policy (hereinafter referred to as the “Policy”) aims to raise awareness among all employees and business partners of the Amadeus Fire Group of the risks arising from corruption.

The Amadeus Fire Group Code of Conduct sets out the avoidance of corruption and antitrust breaches and the non-tolerance of money laundering. This Policy elaborates on and supplements those rules and provides guidance and practical instructions for preventing and combating corruption, in particular in connection with offering or accepting invitations or gifts in the course of business, as well as sponsorships and donations.

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1. Introduction

The Amadeus Fire Group pursues a clear zero-tolerance approach to corruption and unethical behaviour. As a responsible provider of personnel services and training, we are focused on ensuring that all business relationships are based on integrity, transparency and fairness.

2. Purpose and scope

The rules and measures set out in this Policy apply to both passive corruption (e.g. taking bribes) and active corruption (e.g. giving bribes).

The scope covers every business transaction involving all employees and managers, as well as external business partners, suppliers and service providers of the Amadeus Fire Group. In this context, the Amadeus Fire Group requires employees and any contracted third parties to refrain from any form of corruption, to take action against it and to take all necessary measures to prevent corruption in connection with the Group's business activities.

This Policy aims to strengthen the integrity of the Amadeus Fire Group by contributing to an inclusive and ethical business environment.

Responsibility for compliance lies with the Management Board or the management of the respective subsidiaries of the Amadeus Fire Group.

3. Prohibition of all corrupt acts and related conduct

Corruption is defined as the direct or indirect granting, requesting, soliciting, accepting or promising of advantages to employees or representatives of existing or prospective business partners, public officials or equivalent persons, in order to obtain undue business advantages. Examples of undue business advantages include, in particular:

- Using confidential information to gain an advantage over other market participants;
- Awarding contracts despite a higher price or lower quality;
- Paying or accepting facilitation payments ("kickbacks"); and
- Providing personal gifts outside the scope of the business relationship.

The target person does not have to receive the advantage directly. Benefits that flow to third parties but are significant for the target person can also constitute a criminal offence. Examples include donations to a charitable organisation or cultural institution in line with the

target person's wishes, or benefits to or for the benefit of family members or similarly close persons.

Please note that criminal liability for corruption does not require prohibited benefits to have actually been provided or received. Offering or promising, as well as soliciting or requesting, advantages for an unlawful purpose is already punishable as a completed offence.

4. Obligations under German law

This Policy takes particular account of the legal requirements under German law. In particular, it reflects the relevant provisions of the German Criminal Code (Strafgesetzbuch, StGB), including sections 299 StGB (bribery and taking bribes in commercial practice), 299a StGB (taking bribes in the healthcare sector), 331 StGB (accepting benefits by public officials), 332 StGB (passive bribery of public officials), 333 StGB (granting benefits to public officials), 334 StGB (active bribery of public officials) and 108e StGB (bribery of members of parliament). In addition, the criminal offences under sections 261 StGB (money laundering) and 266 StGB (breach of trust) are taken into account, as are corporate due diligence obligations for commercial traders in goods under the Anti-Money Laundering Act (Geldwäschegesetz), the Fiscal Code (Abgabenordnung) and the tax requirements for proper invoices.

5. Prevention of money laundering

The Amadeus Fire Group is committed to strictly complying with measures to prevent money laundering and to ensuring that all business transactions are transparent, traceable and carried out in accordance with applicable laws. All employees and business partners are required to carefully check the origin of financial funds and to report suspicious transactions immediately to the responsible bodies. This also includes carrying out due diligence obligations such as identity checks and documenting relevant information. By consistently applying these principles, we protect the integrity of the organisation and actively contribute to combating illegal financial flows.

6. Gifts and invitations

Gifts and invitations are common practices in business, but they can also raise the risk of suspicion of bribery or improper influence. Gifts, invitations and other benefits may only be accepted if they can be regarded as a business courtesy and the integrity of the parties involved is not compromised.

Based on this principle, the following points must be observed:

- 1.** Employees of the Amadeus Fire Group must not request or demand cash amounts, gifts or other benefits from customers, suppliers, employees, applicants or other business partners.
- 2.** Without exception, employees of the Amadeus Fire Group are not permitted to grant or accept monetary benefits of any kind to or from customers, suppliers, employees, applicants or other business partners.
- 3.** Employees of the Amadeus Fire Group are not permitted to give gifts to, or accept gifts from, customers, suppliers, employees, applicants or other business partners. As a general rule, promotional gifts bearing the company's logo or other items of negligible value are permitted and excluded from this prohibition.
- 4.** Occasional invitations from suppliers or other business partners to business lunches or other events organised by the Amadeus Fire Group are generally permissible. If there is even the appearance that an invitation is extended in order to obtain an improper advantage, it is not permissible.
- 5.** Participation in business lunches or other events hosted by suppliers or other business partners is permissible, provided that participation, in line with section 4 above, does not lead to a conflict of interest or give the impression of inappropriate conduct.
- 6.** Gifts or invitations must never be sent to the recipient's private address or handed over in a private setting.

Any questions regarding the appropriateness of a gift, a business lunch or another event or benefit must be addressed to the Compliance Officer or the Legal Department. All exceptions must be approved and documented in a way that is transparent and verifiable for third parties.

7. Sponsorships and donations

Corporate sponsorship of sporting, cultural or social events as well as education and training measures forms part of the Amadeus Fire Group's corporate and marketing communication. However, it is important to understand that activities in this area, as well as

donations, can be misused as improper means of directly or indirectly committing acts of bribery or corruption. This is prohibited both by law and under this Policy.

As a consequence, these kind of activities may only be carried out in accordance with the following minimum requirements:

- Donations or sponsorships may only be granted to reliable organisations with an excellent reputation for honesty and fair business practices. In this context, donations or sponsorships to well-known charities that meet these criteria may be made without prior approval, provided the criteria set out in this Policy are complied with. If there are any concerns about the organisation to which the donation or sponsorship is to be made, prior approval must be obtained from the Compliance Officer or the Amadeus Fire Group's Legal Department.
- It must be evidenced that the beneficiary of the donation or sponsorship complies with all relevant legal requirements.
- Payments must be made within an approved budget.
- The Amadeus Fire Group must ensure that
 - payments are made solely in accordance with the criteria contractually agreed with the beneficiary; and
 - the sponsored activities are verified.
- The amount must be paid under transparent conditions and in the correct amount and recorded accordingly in the Amadeus Fire Group's books and records.
- Any sponsorship agreement or any donation agreement with a value of EUR 1,000 or more must be in writing and must include the following:
 - an obligation for the beneficiary to comply with the principles set out in this Policy;
 - an obligation stating that the amount paid by the Amadeus Fire Group for sponsorship activities constitutes remuneration for the services provided and will not be used to carry out acts of bribery or corruption;
- Payments must not be made in cash or to anonymous accounts and may only be made in the country in which the beneficiary is registered.

8. Measures in the event of breaches

Any actual, suspected or alleged activity that could constitute bribery or corruption must be reported to the Compliance Officer, either anonymously or openly.

If an employee of the Amadeus Fire Group refuses to carry out an instruction that violates the principles described in this Policy, the employee must not be dismissed, demoted,

suspended, threatened, overburdened or discriminated against in the workplace for that reason.

In particular, the following applies:

Breaches by employees may result in disciplinary measures, expressly including the possibility of termination of employment. It is irrelevant which part of the Amadeus Fire Group the employee belongs to, what role they perform or where the breach occurred. Violations of applicable anti-corruption laws can expose individuals to civil claims for damages, criminal consequences and other penalties, including custodial sentences.

Appropriate disciplinary measures will be taken against business partners who do not comply with the rules set out in this Policy. These may include suspension or termination of the contract underlying the business relationship, a prohibition on continuing the relationship, as well as possible claims for damages.

9. Procedures and reporting channels in case of suspected corruption

Any employee who, acting in good faith, becomes aware in any way of actions that may constitute bribery or corruption is encouraged to report this via the Whistleblowing System to the competent body within the Amadeus Fire Group. Acting in good faith means acting without malicious intent or dishonesty. Knowingly reporting false information, however, will not be tolerated.

Several reporting options are generally available.

By post to:

Amadeus Fire Group
Compliance Officer
Hanauer Landstrasse 160
D-60314 Frankfurt/Main

By telephone on: +49 69 96 87 61 80.

This will put you through to the Compliance Officer.

Via the online reporting portal, which is available in multiple languages at the following link:
[Amadeus Fire Group Whistleblowing System](#)

By e-mail to: compliance@amadeus-fire.de

The Amadeus Fire Group ensures that all reports will be treated confidentially and that reporting employees are protected from retaliation. Anonymous reports are also possible.

All reports are reviewed carefully and, where necessary, an internal investigation will be initiated. For the detailed procedure, please refer to the Rules of Procedure for the complaints procedure at

https://group.amadeus-fire.de/wp-content/uploads/2025/09/Procedural-rules_Amadeus-Fire-Group.pdf.

10. Final provisions

The Amadeus Fire Group expects every employee to commit to the highest ethical standards and to reject corruption in any form. Any form of bribery or improper influence will be pursued consistently. This Policy is intended to help safeguard trust in the company and to ensure transparent conduct with integrity.

Date of last review: April 2026

**Responsible for implementation:
Management / Compliance Department**