



Lobbying Policy

for the Branicks Group and its employees¹

Preamble

The Management Board of Branicks Group AG passed this Policy as basis for a responsible and lawful conduct for Branicks employees.

Effective as of	18/02/2022
Scope of validity	Branicks Group

Version management

Version	Date	Revision	Source	Approved by
Part of the Compliance Policy, Version 2.0	23/12/2021	-	DIC	Management Board
1.0	16/02/2022	Separate policy	DIC	Management Board

¹ The term “employee” is defined as: any person employed by Branicks Group AG and its member companies, including executives (while not including members of corporate bodies of Branicks Group AG), temporary employees, part-time employees, temporary student workers, short-term workers, apprentices, trainees and interns. To ensure a pleasant reading experience, it was decided to use male terms only for any gendered job titles and nouns that refer to persons generically, where applicable. The generic use of male terms is principally gender-inclusive in the sense of gender equality. The short generic form was chosen for editorial reasons alone, so as to improve the text’s readability, and implies no judgement of any kind.



1. Lobbying Policy

The representation of social interests vis-à-vis the body politic is an integral and essential part of democracy. Accordingly, the lobbying work of Branicks is characterised by transparency, fairness, integrity and factual information. It is based on the following principles that apply to all employees of Branicks itself but also to advisers hired by Branicks employees.

The Company's lobbyists and advisers are obliged

- to identify themselves by name and as representatives of Branicks,
- to represent themselves truthfully as Branicks employees or Branicks agents for the purpose of registering (if so intended) so as to be transparent in dealings with third parties and/or public officials,
- to openly state the Company's business interests,
- to ensure that any information provided by the Company reflects its latest state of knowledge in a complete, evidence-based and non-misleading manner,
- to be transparent and honest when obtaining or trying to obtain information for the purpose of a given application, and
- not to induce public servants to violate the rules and standards of conduct they are bound by.

Whenever the Company employs former public servants, we respect their obligation to comply with applicable rules and confidentiality regulations.

Branicks, meaning its lobbyists, will have their names entered in the lobby registers on Germany's federal and state levels, where available, and disclose the relevant costs of their lobbying work in summarised form. If advisers of Branicks have been engaged to represent the Company in its lobbying work, an official contract is generally required that details the purpose and/or the objective of the lobbying work. In accordance with the Group's regulations, external lobbyists retained by Branicks must adhere to the same rules as in-house lobbyists.



Branicks supports the introduction of transparency rules (e. g. lobby register) into the political systems in which it has its interests represented.

Branicks does not donate to political parties, politicians or candidates for political offices. Neither does it sponsor individuals in the body politic or in industry associations.

2. Indications of misconduct and breaches

If you wish to report indications of misconduct and breaches, or if you have any concerns or questions, feel free to get in touch with the contact persons and to use the contact options identified in Sections 10 and 12 of the Compliance Policy.