



# ANTI-BRIBERY & ANTI-CORRUPTION POLICY

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**CHRISTIAN  
PFEIFFER**

# Content

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Introduction

Scope

Objective

Definitions

Practices

Gifts and hospitality

Facilitation payments and Kickbacks

Political Contributions

Charitable Contributions

Conflict of Interest

Raising Concern

Training and Communication

Record keeping

Monitoring and reviewing

## Introduction

Christian Pfeiffer Maschinenfabrik GmbH is committed to the prevention, detection, and remediation of compliance issues. Accordingly, Christian Pfeiffer Maschinenfabrik GmbH has made available resources to the employees and the public in general:

- Our Code of Conduct
- Whistleblower Channel for reporting on the website

## Scope

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located.

We place our trust in our employees, confident in their integrity and commitment to ethical conduct. We believe they are not influenced by corrupt practices. Nevertheless, this policy is established and published as a proactive measure, ensuring that our high standards of conduct are clearly communicated and maintained across the organization.

## Objective

This anti-bribery and anti-corruption policy exists to set out the responsibilities of Christian Pfeiffer Maschinenfabrik GmbH and those who work with us regarding, observing and upholding our zero-tolerance position on bribery and corruption. It also exists to act as a source of information and guidance for those working for Christian Pfeiffer Maschinenfabrik GmbH. It helps them recognize and deal with bribery and corruption issues, as well as understand their responsibilities.

## Definitions

**Bribery** refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law. Bribery is illegal. Employees must avoid bribery to government officials and commercial bribery.

**Kickbacks** are a form of bribery involving the return of a portion of the funds exchanged in a business transaction as a reward for facilitating the transaction or for some improper advantage. Typically, kickbacks occur when a person who can influence or control the decision-making process receives a secret commission or bribe in exchange for choosing a specific vendor, contractor, or service provider. Kickbacks are illegal and unethical, as they undermine fair business practices and promote corruption.

**Facilitation payments** also known as „grease payments,“ are small sums paid to officials to expedite or ensure the performance of routine governmental actions. They are typically not considered bribes in some jurisdictions, as they are not paid to influence the outcome of an action but rather to speed up a process that is legally required to occur. However, these payments are illegal in many countries and are considered ethically dubious because they can contribute to a culture of corruption and expectation of payment for normal duties.

### **Conflict of Interest**

refers to acting or making decisions in a role that serves personal interests rather than the interests of the organization or its stakeholders.

## Practices

This section of the policy refers to 4 areas:

- Gifts and hospitality.
- Facilitation payments and Kickbacks.
- Political contributions.
- Charitable contributions.

### Gifts and hospitality

Christian Pfeiffer Maschinenfabrik GmbH accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favors or benefits.
- b. It is not made with the suggestion that a return favor is expected.
- c. It is following local law.
- d. It is given in the name of the company, not in an individual's name.
- e. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- f. It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- g. It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
- h. It is given/received openly, not secretly.
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- j. The value does not exceed the threshold set by the company, specifically € 200.
- k. It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of compliance management.

### Facilitation payments and Kickbacks

Christian Pfeiffer Maschinenfabrik GmbH does not accept and will not make any form of facilitation payments of any nature. We recognize that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. Christian Pfeiffer Maschinenfabrik GmbH does not allow kickbacks to be made or accepted. We recognize that kickbacks are typically made in exchange for a business favor or advantage.

Christian Pfeiffer Maschinenfabrik GmbH recognizes that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, please treat this topic with compliance manager.

### Political Contributions

Christian Pfeiffer Maschinenfabrik GmbH will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognize this may be perceived as an attempt to gain an improper business advantage.

### Charitable Contributions

Christian Pfeiffer Maschinenfabrik GmbH accepts (and indeed encourages) the act of donating to charities— whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

### Conflict of Interest

A conflict of interest can develop into a bribery problem when an employee requests, agrees to receive, or receives anything of tangible or intangible value, in a manner that interferes with the employee's judgment in performing his or her functions on behalf of Christian Pfeiffer Maschinenfabrik GmbH.

## Raising Concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Christian Pfeiffer Maschinenfabrik GmbH, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behavior can be considered bribery or corruption, you should speak to your line manager or the compliance manager.

You should report as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe soon, or if you have reason to believe that you are a victim of another corrupt activity.

If you refuse to accept or offer a bribe and you report a concern relating to potential act(s) of bribery or corruption, Christian Pfeiffer Maschinenfabrik GmbH understands that you may feel worried about potential repercussions. Christian Pfeiffer Maschinenfabrik GmbH will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

## Training and Communication

Christian Pfeiffer Maschinenfabrik GmbH will familiarize all employees with its whistleblowing procedures so employees can vocalize their concerns swiftly and confidentially. As good practice, Christian Pfeiffer Maschinenfabrik GmbH should provide their employees with antibribery training.

## Record keeping

Christian Pfeiffer Maschinenfabrik GmbH will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a record of the amount and reason for hospitality or gifts accepted and given.

## Monitoring and reviewing

Christian Pfeiffer Maschinenfabrik GmbH compliance manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis.

Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the compliance manager.

This policy does not form part of an employee's contract of employment and Christian Pfeiffer Maschinenfabrik GmbH may amend it at any time so to improve its effectiveness at combatting bribery and corruption.