



Act responsibly

Code of Conduct of the OBI Group

OBI

Content

Foreword	03
Work environment and occupational health and safety	04
- No discrimination, violence or harassment in the workplace	
- Freedom of association	
- Health and safety at work	
- Working hours, wages and salaries	
Protecting assets and intellectual property	06
- Handling assets belonging to the OBI Group	
- Handling IT systems in the OBI Group	
- Protecting trade secrets and intellectual property	
Conflicts of interest, prevention of corruption, donations and sponsorships	08
- Conflicts of interest	
- Prohibition of bribery or corruption	
- Donations and sponsoring	
Combating of money laundering and terrorist financing	10
Fair competition and prohibition of cartels	11
Data privacy	12
Human rights, sustainability and environmental protection	13
- Human rights	
- Sustainability and environmental protection	
Reputation of the OBI Group	15
Compliance with the Code of Conduct	16
- General information	
- Possible consequences of compliance violations	

Foreword

Dear Colleagues,

The aim that we have set ourselves as the OBI Group (OBI Group Holding SE & Co. KGaA and all companies over which it can exercise a controlling influence either directly or indirectly; also referred to in this document as "we") is to be a leading international company in the DIY sector. The OBI Group's excellent reputation is a key factor in achieving this goal. We need to promote and protect this reputation. Our company values clearly state that we take responsibility for one another, for the OBI Group and for the wider society.

Therefore it is essential that we comply with the relevant legislation and internal guidelines while we are performing our business activities. If we do not do so, we risk losing the trust of our customers, our business partners, our employees and the general public. We have developed a Code of Conduct containing binding principles on how to behave responsibly and in line with the relevant legislation in our day-to-day work environment and business operations. It applies to all employees, including managers and the members of the Executive Board and Supervisory Boards in all

companies of the OBI Group. Where necessary, detailed instructions and guidelines are provided in order to specify the Code of Conduct in more concrete terms.

As the Executive Board of OBI Group Holding SE & Co. KGaA, we ask all employees of the OBI Group to familiarise yourselves with this Code of Conduct and to adhere to it for all decisions and measures taken within the scope of your role in the OBI Group. If you have any questions or are unsure of any of the content of the Code of Conduct, please contact your line manager or the central or local contact in the Compliance department.

Wermelskirchen, 1 July 2024

The Executive Board



Work environment and occupational health and safety

No discrimination, violence or harassment in the workplace

We do not tolerate any form of discrimination. All employees are treated the same in particular regardless of their nationality, ethnic background, religion, ideology, gender, sexual orientation, age or disability. Discrimination on the basis of such kind of characteristics is strictly forbidden. We treat each other and third parties with respect and fairness. Employees are free to engage politically and in religious activities, as long as they do not do so in connection with the OBI Group.

We do not tolerate any violence or harassment in the workplace. This includes direct or indirect threats, threatening behaviour, intimidation, physical aggression, gender-based violence, sexual harassment or abuse, corporal punishment, psychological or physical coercion, workplace bullying, verbal abuse, inappropriate criticism and any form of threat of such treatment.

Freedom of association

The OBI Group respects freedom of association and the right of employees to form interest groups. It also grants all employees of the OBI Group the right to uphold their interests on the basis of the relevant national legislation. All employees of the OBI Group are free to join a union or employee representative body of their choice, or to found a union, without having to fear any form of discrimination from the OBI Group. We respect the right of unions to operate freely in line with the regulations governing the place of employment, most notably the right to strike and collective bargaining. The OBI Group respects the fact that employees can be represented by legally appointed works councils and aims to work constructively with employee representatives and the bodies they are part of.

Health and safety at work

We take our responsibility for the health and safety of our employees very seriously. The OBI Group ensures that health and safety at work are continuously protected within the scope of the relevant national provisions and the internal occupational health and safety guidelines.

Working hours, wages and salaries

We ensure compliance with all relevant local legislation regarding working hours, including – but not limited to – overtime, breaks, holiday leave and other time away from work.

We also pay appropriate wages and salaries without discrimination, based on the circumstances at the place of employment, the local minimum wage legislation and the current remuneration agreed on a collective basis.

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Protecting assets and intellectual property

Handling assets belonging to the OBI Group

Employees of the OBI Group must act responsibly and carefully when handling company property entrusted to them and other assets of the OBI Group. All assets belonging to the OBI Group must be protected against loss, damage, theft, embezzlement, breaches of trust and other inappropriate or impermissible use. The relevant guidelines and company policies must be observed when handling assets belonging to the OBI Group. Action will be taken in the event of offences against property or suspicions of such offences.

Handling IT systems in the OBI Group

The information technology (IT) systems of the OBI Group, including hardware, software and all data processed or saved using these systems, are key to ensuring that business activities run effectively and successfully, and may only be used for business purposes. Any private use is only permitted within the scope of the relevant internal policies. All persons with access to the IT systems must use the systems appropriately and comply with all IT security guidelines and policies of the OBI Group.

The company agreements regarding the use of the internet and electronic means of communication must be observed.

Protecting trade secrets and intellectual property

Confidential information must be treated as such, particularly where this refers to information not known to the public regarding the OBI Group and its business activities as a whole. Most notably, this applies to trade secrets of the OBI Group and trade secrets of third parties that are disclosed to employees within the scope of their work. Employees who receive such information must not share it with unauthorised persons within or outside the OBI Group, nor must they make it accessible or use it to their own advantage or to the advantage of third parties. Confidentiality breaches can cause serious damage to us and our business partners, and can lead to civil action and criminal prosecution.

We respect the legally acquired intellectual property rights of all market players, particularly copyrights, patents, brands and trade secrets. Breaches can lead to civil sanctions (such as compensation for damages) and public sanctions (such as fines and penalties). For this reason, all employees are required to not only protect the intellectual property rights of the OBI Group, but also avoid violating the rights of third parties.



Conflicts of interest, prevention of corruption, donations and sponsorships

Conflicts of interest

Employees must make business decisions in the best interests of the OBI Group and must not be influenced by personal interests or the interests of third parties. Employees may not use their position within the company to pursue their own interests or the interests of third parties (including parties who are close to them) to the detriment of the OBI Group. When making business decisions, we always remain objective, act in the best interests of the OBI Group and do not consider any personal gains. Any potential conflicts of interest must be disclosed to the responsible line manager and, if there is any doubt, must be resolved with the input of the Compliance department.

Prohibition of bribery or corruption

Contributions such as gifts, hospitality and invitations are common in business relationships. These may be accepted, provided that they do not breach internal or statutory regulations. On the other hand, exchanging excessive or inappropriate gifts or hospitality is not permitted. We do not tolerate bribery, corruption or any other illegal practices of this nature by employees of the OBI Group or by business partners. Employees are prohibited from requesting gifts, benefits or other services for themselves or third parties from existing or potential business partners. Any cases of doubt must be discussed in advance with the line manager and the Compliance department.

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Particularly strict rules often apply when dealing with public and elected officials, including governments, legislative bodies, authorities, jurisdictions and other public institutions and their employees. Violations can have particularly serious consequences. Employees and third parties acting on behalf of the OBI Group may not offer or grant direct or indirect payments, gifts or other benefits to public officials. This also includes facilitation payments; in other words, payments made to public officials as a means of accelerating routine official acts.

Donations and sponsoring

The OBI Group gives donations – that is, contributions made on a voluntary basis without anything in return – and sponsorship money – that is, contributions in return for a contractually agreed service – for important social causes in areas such as environmental protection or sports. Donations and sponsorships may only be granted after the internal approval process established for this purpose has been completed.

All donations must be documented transparently and comply with internal policies. The OBI Group does not participate in political activities or campaigns as a matter of principle. Monetary donations or donations in kind to political parties, political organisations or their representatives are not permitted. These are not to be confused with support for and involvement in socially recognised causes, including public causes of this nature where applicable.

All sponsorship activities must be recorded transparently in the form of a written contract and must be proportionate to the exchange value being offered.



Combating of money laundering and terrorist financing

We comply with all national and international provisions and regulations designed to combat money laundering and terrorist financing.

Money laundering refers to the process of bringing money or other assets originating from criminal offences into economic circulation, either directly or indirectly, thereby disguising the origin of the money or assets.

Terrorist financing refers to money or other means provided for terrorist offences or in support of terrorist organisations.

All employees of the OBI Group who come into contact with or monitor cash flows must observe all relevant guidelines and instructions on combating money laundering and terrorist financing. Most notably, this includes ensuring strict compliance with the upper cash payment limits stipulated by the applicable Anti Money Laundering Acts, reporting the legally prescribed notifications in cases where money laundering or terrorist financing is suspected and assessing business partners. If there is any doubt, input from the Anti Money Laundering Officer or the Compliance department must be sought.



Fair competition and prohibition of cartels

We observe all legislation and statutory provisions that protect free and fair competition.

Agreements and coordinated practices between competitors (horizontal agreements) are prohibited if they are likely to prevent, restrict or distort competition. This includes, but is not limited to, agreements and coordinations (including indirect agreements via third parties) on purchasing and selling prices, offers, other sales or purchasing conditions, sales quotas and allocating geographical markets.

Many forms of vertical agreement – that is for example, between suppliers and the OBI Group or the OBI Group and franchise partners – are also prohibited. In particular, this includes restricting the ability to specify prices or sales conditions, subject to a very small number of exceptions, which must be agreed with the

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Compliance department in all cases. Alliances (such as purchasing alliances) or exclusive supply agreements may not be permissible and must always be aligned with the Compliance department.



Data privacy

The OBI Group respects the privacy and personal rights of its employees, customers, suppliers and other third parties. We therefore treat all personal data with the utmost care. Personal data is only gathered, saved, used and otherwise processed within the legally permissible scope and based on consent or a contractual or statutory arrangement.

If in doubt, please contact the relevant Data Privacy Officer or the Compliance department.

***” The OBI Group
treats personal
data with utmost care.***



Human rights, sustainability and environmental protection

Human rights

We observe all internationally recognised human rights and the legislation and provisions put in place to protect them. Our aim is to ensure these rights in all locations where the OBI Group operates. We therefore take steps to detect, prevent and remedy risks. We also require our suppliers and other business partners to take responsibility for observing human rights and complying with labour standards.

For this reason, the OBI Group has also drawn up a Code of Conduct for business partners (available from: [https://www.obิ.de/legal/verhaltenskodex](https://www.obి.de/legal/verhaltenskodex)).

In addition, you can find more information in the OBI Group's declaration of principle (available from: <https://www.obิ.de/legal/grundsatzerklaerung>).

Sustainability and environmental protection

We ensure compliance with the relevant environmental protection standards, as well as international and local legislation, along the entire supply and value chain and we require our employees and suppliers to act responsibly in this respect.

We want to fulfil our responsibility to people and the environment within the scope of our own business activities and along the supply chain. For us, this means preserving resources and preventing pressure on the climate and the environment. Our focus in this case is on ensuring that the goods we provide and their manufacturing processes are in line with the requirements of sustainable development. The OBI Group aims to keep waste, as well as energy, water, raw material and operating material consumption, as low as possible throughout the entire value chain.

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Reputation of the OBI Group

The OBI Group's reputation among the general public and our business partners is an extremely valuable commodity for a commercial enterprise with a well-known brand. By complying with the Code of Conduct, all employees ensure that the OBI Group's reputation is maintained and any damage to it is avoided. We ask that all employees observe any guidelines that may apply when communicating on social media or in the public media. Anyone of us as well as external third parties are able to report infringements via OBI's whistleblower and complaints platform ("Speak up") so that these can be resolved and remedied.

By complying with the Code of Conduct, all employees ensure that the OBI Group's reputation is maintained and any damage to it is avoided.



Compliance with the Code of Conduct

General information

All employees – including managers and the members of the Executive Board and the Supervisory Boards in all OBI Group companies – must comply with this Code of Conduct within the scope of their role in the OBI Group. Each manager is responsible for ensuring that the employees they are responsible for are familiar with this Code of Conduct. If any questions arise, the central or local Compliance contacts are available to help. The following central e-mail address can also be contacted: compliance@obi.de.

If breaches of statutory provisions or this Code of Conduct are discovered at an early stage, we can respond immediately and take steps to avert any more significant damage to the OBI Group, our customers and business partners, and the general public. For this reason, we ask that all employees inform their line managers and the Compliance department immediately of any incident that violates the provisions set out in this Code of Conduct. It is also possible to use the OBI Group's whistleblower and complaints platform ("Speak up", available at: <https://obi.integrityline.app>); this can be done anonymously if required. All information provided through this channel are reviewed and handled in a strictly confidential manner. You can find more information in the rules of procedure for the whistleblower and complaints process.

Possible consequences of compliance violations

The OBI Group follows a zero-tolerance policy on breaches of statutory provisions. We consistently follow up evidence of breaches. Proven breaches can result in appropriate disciplinary action. In the event of financial loss, claims for damages may also be asserted. In cases involving potentially criminal conduct, we also reserve the right to press criminal charges and to work with the investigating authorities on resolving the breach.

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Imprint

OBI Group Holding SE & Co. KGaA
Albert-Einstein-Str. 7-9
42929 Wermelskirchen
Germany

Contact

OBI Group Holding SE & Co. KGaA
Corporate Legal & Compliance
Albert-Einstein-Str. 7-9
42929 Wermelskirchen
Germany

www.obigroup.com

OBI