

1 INTRODUCTION

OHB SE is committed to adhering to the highest ethical standards and combating all forms of corruption and money laundering in the course of its business activities. The Code of Conduct and the Supplier Code of Conduct apply in parallel with this Group Directive and are supplemented in more detail by them.

1.1 Purpose of the document

All employees and bodies are required to strictly comply with applicable anti-corruption and anti-money laundering laws and regulations in all countries and regions in which the company operates. The purpose of this Group Policy is to define our anti-corruption and anti-money laundering obligations and to raise awareness so that they are understood and adhered to by all employees. Violations of these laws can result in serious criminal and civil consequences. We promote a culture of zero tolerance for corruption and money laundering and expect our employees and business partners to share these values.

1.2 Scope

This Group Directive Anti-Corruption and Money Laundering (hereinafter referred to as the "Group Directive") applies to all employees and bodies of companies affiliated with OHB SE. For the purposes of this Group Directive, a connection exists if the shareholding, directly or indirectly through subsidiaries, amounts to at least 50% in the affiliated company. Third parties within the meaning of this Group Directive are all persons who are not employees of OHB SE or an affiliated company in the above-mentioned manner or who are an organ of OHB SE or an affiliated company on the basis of a service contract. This Group Directive has no territorial limitations. It applies at home and abroad.

2 DEFINITIONS

2.1 Prohibition of corruption

Corruption is the direct or indirect giving, demanding, offering, accepting or promising benefits to employees or representatives of current or potential business partners, public officials or persons treated as such, with the aim of obtaining unjustified business advantages or causing a decision-maker of the client to violate his official duties. It is expressly forbidden to practice or participate in corruption in any form. This applies to both business and private life.

2.2 Prohibition of money laundering

Money laundering is the concealment of the origin of illegally acquired assets by smuggling them into the legal financial circuit. It is expressly prohibited to practice or participate in money laundering in any form. This applies to both business and private life.

3 OBLIGATIONS

3.1 Donations

The acceptance and granting of benefits must comply with applicable laws and regulations and be transparent. The following form of benefits must be reported to the Compliance Officer before they are accepted or granted.

Gifts

- a) This applies to gifts with a value of €20 or more.
- b) Gifts over €50 are generally not permitted. In exceptional cases, they may be approved with the written consent of the Compliance Officer. Permission must be requested in writing.
- c) If the value of a gift is not apparent to the employee, the value must be estimated to the best of his knowledge and belief. In case of mistake as to the amount of the value and in case of non-approval, the gift must be returned at the customer's own expense.
- d) If the sum of the non-cash benefits in one month exceeds the tax-free amount, the total amount is subject to income tax and must therefore be reported to the Human Resources Department. Every employee is obliged to report benefits received in connection with the employment contract in accordance with the applicable regulations for tax purposes.
- e) A written application with the names of the persons involved, the occasion, date, etc. must be submitted by the employee to the Compliance Officer.

Entertainment

- a) Catering in the period from 11.00 a.m. to 3.00 p.m. ("lunch") between third parties and employees and/or bodies in the company or outside the office from a value of € 50 per person must be reported to the supervisor and the Compliance Officer.
- b) Catering from 6:00 p.m. ("dinner") between third parties and employees and/or bodies in the company or outside the company must be reported in advance to the respective supervisor and the Compliance Officer from a value of € 100 per person.
- c) For catering that is not "lunch" or "dinner", 4.1 Catering (a) shall apply mutatis mutandis.
- d) The above regulations do not apply to hospitality that was not foreseeable for the employee. In this case, the employee must notify the Compliance Officer of the benefit immediately upon receipt. If the value of the donation is not known, it must be estimated by the notifier to the best of his or her knowledge and belief.
- e) A written application with the names of the persons involved, the occasion, date, etc. must be submitted by the employee to the Compliance Officer.

3.2 Travel

Invitations from third parties may not be accepted and invitations to third parties may not be extended if there are business relationships with these third parties. This does not apply to travel expenses for business trips that are contractually regulated with a customer or supplier. Furthermore, this does not apply to trips without an overnight stay with a distance of less than 50 km, measured by the company or from the employee's respective home. Exceptions require the prior approval of the Executive Board and the Compliance Officer and must be documented accordingly. The provisions of 4.2 apply in addition to the company-specific travel guidelines in the currently valid version.

3.3 Sponsorship

Services provided by OHB SE and its affiliates to third parties in the manner described above, which exclusively serve non-profit, charitable, sporting or cultural purposes (sponsorship), require the approval of the Management Board/ Executive Board of the respective company and must be reported to the Compliance Officer.

3.4 Payments for business initiation

Any payments to third parties for the general initiation of business without specific consideration are not permitted. Excluded from this are contractually agreed commission payments in the event of success for actually existing business relationships. In this case, however, a partial refund of the commission to third parties is not permitted.

3.5 Notification of suspected cases / obligation to notify

All employees and corporate bodies are obliged to report any suspicion of a violation of the Group Directive, guidelines or applicable law. In order to comply with this reporting obligation, the company has set up a whistleblower portal under <https://www.bkms-system.com/wecreateintegrity>. Information can also be submitted anonymously.

Reports should be addressed to the responsible Compliance Officer or, if there is no such Compliance Officer, to the Chief Compliance Officer of OHB SE. The Compliance Officer is obliged to follow up on the information and to examine the respective facts.

All incoming reports are documented by the Compliance Officer and recorded in a protocol.

4 COMMUNICATION AND TRAINING

This Group Policy is made available to all employees and updated regularly. Training sessions will be provided to raise awareness of the fight against corruption and money laundering.

5 CONSEQUENCES

Violation of this Group Directive may result in employment and civil law measures and, where appropriate, the initiation of criminal investigations. The company reserves the right to file criminal charges, file criminal charges or file a private prosecution after assessing the individual case.

6 INCEPTION

The Group Directive Anti-Corruption and Anti-Money Laundering will enter into force on 20 January 2024. It replaces the previous Anti-Corruption directive of 1 January 2018.