Code of Conduct

External Version as of 19.05.2025

Table of Contents

1	**Walk your talk at EOS – the way we do things**	**3**
1.1	The tone from the company	3
1.2	How this commitment is intertwined with our vision, purpose, and heartbeat	5
1.3	UN Global Compact – taking responsibility	7
1.4	Worldwide application and leadership expectation	7
2	**Doing business with integrity**	**8**
2.1	Bribery, corruption and conflicts of interest	8
2.2	Anti-money laundering	10
2.3	Competition and Anti-Trust	12
2.4	Fraud	14
3	**Keeping our stakeholders and EOS safe**	**16**
3.1	Data privacy	16
3.2	Information security	18
3.3	Public affairs and Interaction with authorities	20
3.4	Communicating on behalf of EOS	22
4	**Corporate Responsibility – being part of our society**	**23**
4.1	Labor and working environment	24
4.2	Environment	26
4.3	Human Rights	27
5	**About this Code of Conduct**	**28**
5.1	What is special about this Code of Conduct	28
5.2	Why you should check out our Code of Conduct on a regular basis	28
5.3	Violations, whistleblowing, and investigations	29

1 Walk your talk at EOS – the way we do things

1.1 The tone from the company

The tone from the top: CEO

Dear Colleagues,

Our world is changing fundamentally these days: Globalization and digitalization allow us to engage with the entire world as a marketplace and do business with partners almost in real time. We often only have to reach out to find new opportunities.

But with new opportunities comes growing uncertainty. Sometimes we don't have the time for long-term relationship building. The clock is ticking, and we must make decisions quickly. In these new conditions, it is even more important to rely on a strong moral compass that guides us through this world. Allow me to quote the famous TV talkshow host and entrepreneur Oprah Winfrey:

> "Real integrity is doing the right thing, knowing that nobody's going to know whether you did it or not."

I agree with her. To ensure a prosperous and at the same time secure environment to live in, we must be ethical in our business dealings. Because if we aren't, we are vulnerable. This is the reason why EOS has defined moral standards in this Code of Conduct you are about to read. We commit to it, and we ask all of you, dear partners, clients, and employees, to do the same. Because we want to do business in a way that enables people involved to benefit from it, both now and in the future.

Do you agree?

Marwin Ramcke

The Voice of the Chief Compliance Officer

Dear Colleagues,

In a world where dynamic and sometimes disruptive changes are a constant feature, digitalization and globalization offer us numerous opportunities to shape and expand our business. Compliance is a central element of our corporate culture, fostering integrity and enabling innovation. We strive for an environment where everyone takes responsibility for compliance and feel supported in doing so.

Our mission is to protect EOS from risks such as sanctions, reputational damage, cyberattacks, and data breaches to secure our economic objectives. At the same time, we pay attention to the rights and freedoms of our employees, business partners, defaulting payers, and other third parties. An effective compliance management system tailored to the needs of EOS provides the necessary security and flexibility for our success. The strength of a compliance organization is built on a culture fostered by awareness and training. Our goal is to establish a compliance management system that secures both current and future business while adequately addressing the constant technical, economic, social, and political changes.

In the international financial services sector, digital transformation is essential for remaining competitive, especially with our diverse and evolving business models. We must identify risks, take appropriate measures to mitigate them, and implement these sustainably. The use of AI is bound to increase within business, and we must ensure we use it responsibly and transparently. Additionally, we must be prepared for potential cyberattacks and security incidents.

Christine Lagarde aptly describes this mission: "We remain committed to the goal of promoting a robust, resilient, and forward-looking banking sector that meets challenges and opportunities alike, ultimately supporting the overall economy." (ECB Annual Report 2024)

Compliance helps us make the right decisions and live our values. As a reliable partner, the compliance organization and I are here to support you in acting responsibly and realizing our full potential. The EOS Code of Conduct serves as a compass, a valuable guide in our daily work, and forms the foundation of all of our actions.

Warm regards,

Meike Fabian

1.2 How this commitment is intertwined with our vision, purpose, and heartbeat

At EOS, we strive to make the world debt-free (purpose), which means that we give our defaulting payers a fair chance to settle their debts. We do this by investing in the best people and technology to offer services for our clients and defaulting payers that can be used effortlessly and easily. This is reflected in our vision: We are a globally connected financial investor, driven by technology and entrepreneurial spirit.

"For a debt-free world" embodies the meaning of our daily work and our self-image, as well as our aspiration to live up to our consciousness of our social responsibility and to act with a sound sense of proportion.

This self-imposed commitment sets us apart from our competitors even more by creating added value through our services for our clients, defaulting payers, the economy, ourselves, and therefore society as a whole.

We offer balanced solutions that are economically viable for all stakeholders and that give defaulting payers a fair chance to settle their debts. For this purpose, we adapt the debt recovery process individually and offer fair and realistic ways to achieve a debt-free existence, considering the individual solvency and the economic impacts on the defaulting payer of attaining the goal of debt relief.

Needless to say, the respectful treatment of defaulting payers with sensitivity, tact, and a sense of responsibility is important for us and, therefore, is expected of everyone at EOS. We always communicate on an equal footing and remain objective even when conversations get difficult.

Furthermore, we engage with debt collection associations to help shape the legal and ethical framework of our business.

In our efforts to meet this commitment, we have launched many initiatives of a very diverse nature in our companies.

One example of our initiatives is the finlit foundation, which is helping to break the taboo on money and debt, improve financial literacy and thus counter excessive personal debt. Because as one of the largest debt collection companies in the world that knows all about debt, we can support potential defaulting payers often before it is too late. With the finlit foundation, we are giving something back to society and are focusing on raising awareness about how to handle money, even at an early age, so that over-indebtedness does not occur in the first place.

To achieve our goals, we are guided by our seven heartbeat principles:

WALK YOUR TALK
we model behaviors that we have committed ourselves to and that we expect from others

TRUST
we establish trustful relationships with our employees and external partners

STRIVE FOR EXCELLENCE
we aim for best-in-class solutions

EMBRACE CHANGE
we view change as an opportunity for personal and business growth

BE COURAGEOUS
we openly address conflicts and point out problems

LOVE TO LEARN
we use our own mistakes as learning opportunities and constantly improve ourselves

SHARE YOUR KNOWLEDGE
we work across local boundaries and leverage our synergies

These heartbeat principles are also reflected in the content of this Code of Conduct, which serves as a groupwide framework for our commitment to consistently act in compliance with laws as well as our ethical standards and values.

Acting in accordance with both the EOS heartbeat principles and this Code of Conduct is crucial to be successful on our path, which consequently is a prerequisite for meeting our high standards and goals in terms of sustainable entrepreneurship, social responsibility and integrity in general.

1.3 UN Global Compact – taking responsibility

EOS is a signatory of the UN Global Compact (UNGC), a framework in which companies engage in order to safeguard and enact universal principles in the areas of human rights, labor, environment, and anticorruption.

The ten principles of the UNGC are also reflected in our Code of Conduct:

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Reflected in chapter: Human Rights

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: the elimination of all forms of forced and compulsory labor;

Principle 5: the effective abolition of child labor; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Reflected in chapter: Labor and working environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Reflected in chapter: Environment

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Reflected in chapter: Bribery, corruption and conflicts of interest

1.4 Worldwide application and leadership expectation

All employees of EOS need to acknowledge the Code of Conduct. We expect all employees, managers, officers and executive board members to have a general awareness of the respective subject matter and to comply with its requirements to the best of their knowledge.

Furthermore, EOS regularly rechecks the continuous acknowledgment of the Code of Conduct through specific worldwide e-learnings (“learning snacks”, focusing on the main topics and/or recent changes).

EOS expects all managerial staff in particular to integrate the Code of Conduct into their leadership commitment and raise awareness of these subjects among all their peers and teams accordingly.

2 Doing business with integrity

2.1 Bribery, corruption and conflicts of interest

Bribery, corruption and conflicts of interest encompass all situations where someone tries to unduly influence someone or is unduly influenced with the aim of either granting or receiving an inappropriate or even illegal advantage for themselves or someone else. In any case it leads to the problem that decisions are not being based on objective reasoning or taken on behalf of the respective party as they should be.

We are aware that there is no tolerance for any activities, either on behalf of ourselves or the company, relating to either granting or seeking of any undue advantage in exchange for a quid pro quo. We always do business with the utmost care so as not to raise any concerns regarding bribery, corruption, or conflicts of interest and to always clearly express and expect that stance within the company and towards all our business partners.

DO's

- Always ask yourself first: Could this gift/advantage be seen as inappropriate? Is this gift only being granted because the other party hopes to influence my decisions now or in the future? Am I trying to influence a decision? Would I make such a gift or grant such an advantage in the same situation? If in doubt, it is better to speak to your Compliance Officer / specialist.

- Avoid situations where someone could question your judgement, your objectivity or your loyalty to EOS. Whenever there is a situation where you and close family members or friends are in any way linked to a business activity, you should openly discuss this situation with your manager and whenever possible hand the case over to someone not involved in a conflict of interest (recuse yourself completely from being involved).

- If you think that you are in a situation where you genuinely feel that your safety or the safety of another person is being threatened, you may consider making the payment or complying with the request made. However, you should immediately bring this situation to the attention of your Compliance Officer / Legal Specialist and also consider reporting it to the competent government authorities (i.e., police).

DON'Ts

- Don't undertake any business outside your job, which may in anyway be linked to the work you are doing for EOS (either self-dealing or direct competition). If in doubt or as possibly defined by your employment contract, all your side lines/second jobs should be discussed and approved with your department head and HR.

- Don't engage directly or indirectly with EOS in a business relationship, e.g. don't take part in public or non-public auctions where EOS acts as a seller of claims, collaterals or real estate.

- Don't grant any gifts or advantages to your employees or business partners without making sure that they are not in violation with local laws and our Group and Company Guidelines and that tax matters are being correctly handled. In any case, gifts/invitations/advantages should never be used to try to influence a decision and at the same time must be appropriate for the situation in question.

- Don't hire or promote someone you are related to or who is a close friend without the involvement of your manager and someone from HR. If the position is at a manager level or above, you should also involve your responsible EOS board member and HR and get approval before recruiting or promoting such a person (this applies to every single career step).

- Don't grant any benefits to business partners to get a business/contract (e.g. bribes, facilitation payments, kickbacks).

RISK INDICATORS

- When business is done in countries with high levels of bribery and corruption (e.g., according to the Transparency International Corruption Perception Index – TI CPI) and especially when doing business with authorities or public sector companies, additional caution should be exercised.

- Unusually high fees, commissions or gifts/expensive entertainment and hospitality.

- Requests for cash payments or payments to third party companies or offshore locations.

- Business partners who refuse to sign compliance provisions in contracts, who appear not adequately staffed/equipped to render the required services, or who ask for side letters/verbal agreements that bypass a contract.

- Potential business partners who ask for favors.

- Favor or arrangement where your counterpart suggests not documenting it, and invitations to discuss things without witnesses e.g. circumventing the four-eyes principle (two-person rule).

2.2 Anti-money laundering

Money laundering is the concealment of the true origin of illegally obtained revenues for the purpose of introducing them into the legal economic and financial cycle. To identify these transactions, all money laundering laws require compliance with certain due diligence obligations.

This issue is also closely related to the prevention of terrorism financing, which means the provision and collection of financial resources for terrorist activities. These funds do not necessarily have to come from criminal offenses.

EOS requires all its managers and employees to be aware of the legal requirements and to recognize critical situations depending on their field of responsibility. All departments which accept and make payments, onboard new clients and select partners/suppliers should be even more aware of these types of risk and indicators.

DO's

- Whenever you accept cash or money transfers, you need to consider respective thresholds and identification requirements based on your local legal requirements. In such cases you need to collect all data as required by law (e.g. full name, address, nationality, ID copy) and ensure that this data is documented according to the legal retention period.

- Clients, investment partners, critical suppliers/service providers, NPL sellers, buyers etc. are always to be vetted as requested by the respective national anti-money laundering law and with regard to their reputation in general. EOS is committed to conducting business activities with reputable partners.

- As soon as there is a suspicion that money laundering is involved, the relevant Anti Money Laundering Officer / specialist must be consulted promptly.

- In the case of atypical transactions or if you intend to initiate business with companies from high-risk countries, be sure to observe the relevant local legal requirements and to carry out the necessary due diligence / know your customer (KYC) procedures.

DON'Ts

- Don't select clients, investment partners, critical suppliers/service providers, NPL sellers, buyers etc. with a reputation for potentially unethical or even criminal conduct.

- With regard to business partners, don't accept any payments from third parties if they are not based on the contractual agreements concluded with such parties.

- Don't accept cash payments in unusual situations (e.g. especially in association with suppliers, partners or in the case of large sums).

- Don't engage in business with companies on embargo lists.

RISK INDICATORS

- Requests to accept cash payments or make cash payments in cases where wire transfer/bank transfer would be much more common and convenient.
- Requests to accept or make payments to third parties/unusual execution (not part of the contract/business activity/legal basis).
- Receipt of third-party payments and refusal to disclose the relationship to the actual contracting partner.
- Requests to make payments to offshore locations/high risk countries (e.g. known for terrorist activities).
- A payment doesn't match the defaulting payer's income and wealth situation.
- A politically exposed person (PEP) is involved.

2.3 Competition and Anti-Trust

Competition and antitrust violations are practices whereby companies enter into mutual agreements or exchange business information to benefit at the expense of competitors or the overall economy. Basically, every agreement restricting competition must be avoided, regardless of whether it has been agreed in writing, orally or even tacitly. The most serious violations are price agreements and the segmentation of markets. But arrangements on tenders, the exchange of sensitive information regarding competition or the abuse of market power also represent violations of the law. Even if those violations are only suspected, Anti-trust authorities can initiate lengthy investigations and if proven, eventually impose severe company penalties, personal fines and/or start criminal prosecutions. Entering and discussing forms of cooperation like co-investments and/or servicing arrangements for transactions or other business opportunities are of course permitted provided the circumvention of competition is excluded.

EOS therefore requires all its managers and employees to always critically question all contacts to competitors.

DO's

- When planning a co-investment with a competitor / partner, make sure that neither the objective nor its effect is to prevent, restrict, or distort competition and that this is disclosed to the seller / client.

- If you are invited to a meeting with a competitor, always ask yourself about the reason for the invitation. If those reasons seem to be non-compliant with competition and anti-trust law, consult your Compliance or Legal Department just as you would in any other case of uncertainty.

- If, in an (association) meeting, a competitor starts to discuss matters that conflict with competition and anti-trust laws, object to the discussion, signal that EOS has no interest whatsoever in taking part in such arrangements, and have your position recorded in the minutes (if any). If the competitor will not let go of the matter, leave the meeting.

- When discussing the current market situation with competitors, make sure the discussion comprises only general, publicly accessible, or noninternal considerations.

- Any enquiries from antitrust or competition authorities must be submitted to the Otto Group Anti-Trust Officer in accordance with the Otto Group Guideline Anti-Trust.

DON'Ts

- Don't arrange agreements or even exchange information including prices, price components, profit margins, costs, sales, strategic information or other terms with competitors, except if engaging in lawful cooperation arrangements with competitors and other market participants.

- Don't allocate/split up markets, technical developments or investments, except if engaging in lawful cooperation arrangements with competitors and other market participants.

- When participating in (association) meetings, don't talk about sensitive topics as mentioned above.

- Don't engage in behavior which abuses a dominant market position by preventing competitors from competing effectively or pushing them out of the market (e.g. charging unreasonably high prices to take advantage of clients, forcing unjustified conditions on partners).

- When participating in benchmark surveys, do not provide any information revealing the company or its strategies.

2.4 Fraud

Fraud means creating false facts or concealing true facts, i.e. deceiving someone else with the intention of enriching oneself at the other party's expense. In instances of fraud a distinction is made between external and internal cases. In external cases, third parties outside of EOS try to defraud the company. In internal cases, employees of EOS can also fall into the trap and try to defraud EOS, its clients, or defaulting payers for various reasons.

All managers and employees need to be aware that internal fraud will not be tolerated and criminal charges will be pressed in all cases. In addition, everyone at EOS should be cautious about external fraud. External fraud will also be reported to the police.

We expect anyone within EOS who suspects fraud to seek help and/or to make the persons or departments responsible aware of the situation. EOS expects all managers and departments to deal with any allegations confidentially and with sensitivity and to refer them to the most suitable internal function that can address the issue at hand and handle possible remediation.

DO's

- Always seek help when suspecting fraudulent practices by either internal or external persons.
- Watch out for identity theft and concealment when in contact with external parties (e.g. persons who pretend to work for a client or try to impersonate someone within EOS).
- Always follow the established processes (e.g. four eyes principle/double check principle).

DON'Ts

- Don't carry out dishonest or fraudulent actions of any kind, especially with regard to money, property, or services of either EOS, EOS clients, EOS defaulting payers, or EOS partners.
- Don't act based on requests of other persons if these seem to be unreasonable, dishonest or otherwise strange. Take note and refer these requests to the next level, clearly stating your unease/suspicion.
- Never circumvent established internal processes (e.g. four-eyes principle with regard to all monetary processes, granting access to premises or software, providing confidential information etc.). Fraud is mostly made possible when we let our guards down.
- Don't release (sensitive) information to unknown persons, even if they appear to be trustworthy or seem to work for a trustworthy company.

RISK INDICATORS

External fraud:

- Emails/phone calls with urgent requests to transfer money and circumvent standard processes.

Internal fraud:

- Colleagues who are very reluctant to share work, hand over workload to co-workers or even go on vacation.
- Colleagues who ask you to conceal, alter, falsify or omit information.
- Colleagues who show a sudden change in lifestyle.

3 Keeping our stakeholders and EOS safe

3.1 Data privacy

Personal data in the EOS context means all data which clearly pertains to a natural person and allows identification of said natural person and/or gives additional information on them, e.g. full name, private address, phone number, email, date of birth, banking data, financial information, salaries, evaluations, ID or personnel numbers etc. All our stakeholders need to be sure that we process all personal data with adequate care and in accordance with data privacy laws. Processing includes all types of activities in connection with personal data, e.g. collection, storage, transfer, usage etc.

To ensure the data privacy of all our stakeholders we expect everyone at EOS and our business partners to take great care in dealing with data and particularly with personal data. In any case of uncertainty about how personal data is to be handled correctly, please don't hesitate to consult your Data Protection Officer / Privacy specialist.

DO's

- Always ask yourself first: Is the data I am handling here the data of an identified or identifiable person. If so, be very careful about how to process this data and process it only in the documented way. If the data is not personal data, you should nevertheless consider whether this information is confidential from a business perspective and should therefore be treated equally carefully.
- Nevertheless, continue to consider innovations, opportunities or ideas which would benefit EOS and our clients even if there are data privacy concerns, and always discuss these with your manager and inhouse data privacy experts, who can help find viable solutions.
- Be aware that all processing of personal data should be done only in accordance with data privacy law, meaning that whenever you plan to implement a new activity or change an existing activity, the use of software, the collection of new data, etc., you always need to involve the data privacy specialist / Data Protection Officer as specified by your internal policies so that he or she can assess compliance with data privacy laws.
- Only collect and process data within the scope of the specific purpose and in accordance with a valid legal basis for processing.
- Only allow colleagues to access personal data on a strictly "need to know" basis.
- Whenever possible, anonymize and pseudonymize personal data you are working with.
- Observe and ensure the relevant retention and deletion periods.
- Always make sure in advance that you are permitted to transfer personal data to another party.

DON'Ts

- Don't keep personal data which has to be deleted after the legal deletion period.
- Don't process or pass on personal data without a legal basis or in an undocumented way.
- Never handle personal data in careless ways.
- Avoid using search engines which save our IP address (e.g. Google or Yahoo) in conjunction with people searches (if their usage is at all permissible by law, use services without IP address logging such as www.Startpage.com).

RISK INDICATORS

- Processing of data of an identified or identifiable person.
- Implementing new or changing existing software or processes.
- Working with service providers (e.g. outsourcing).
- Requests from third parties regarding a person's name, address, debt, age, bank account number, photographs, ID copies etc.

3.2 Information security

Information security not only encompasses everything related to information technology risk but also focuses on how we protect documents and data and how we ensure confidentiality. As we are a highly digitized and data-driven financial investor, data protection is even more important and requires compliance with stringent data protection standards. Data is our biggest asset and the protection of sensitive data of any kind is the foundation of our success.

In order to protect our data, it is absolutely essential for us to treat our clients', defaulting payers', and our own data carefully and conscientiously.

DO's

- Always change standard/initial passwords.
- Be cautious when working in public places. When using a laptop in public, use a privacy screen.
- Report data loss (even if only assumed) and suspicious activities immediately to your Information Security Officer / specialist.
- Lock your computer ("Windows button" + "L") when leaving your computer even in the case of a short absence.
- Documents with confidential content must be appropriately stored and disposed of (e.g. confidential disposal bin).
- Be very careful before opening attachments or links (which sometimes look like attachments /files) from unknown sources. If in doubt, contact your local Information Security Officer / specialist before opening suspicious attachments/links.

DON'Ts

- Don't give your usernames and passwords to other people, even within the company. Usernames and passwords should be personal. Functional (nonpersonal) users are only acceptable under very specific circumstances and in a low-risk environment.
- Don't provide organizational charts or other company information to a third person outside the company without a confidentiality agreement or confidential clause in the contracts. This information can often be used in elaborate fraud schemes and phishing calls/emails.
- Don't leave documents, mobile devices (laptops, cell phones) or removable storage devices (CDs, USB sticks, external hard drives) unattended.
- Don't share internal information on the internet/social media unless this is directly warranted by your job (e.g. as an employee of or based on an approval by your Communications Department).

RISK INDICATORS

- Handling of confidential information/Access to software with sensitive information
- Working in public spaces/outside the office (mobile working/working from home)
- Emails/phone calls/letters etc. from unknown sources

3.3 Public affairs and Interaction with authorities

Politicians and society rightfully expect companies to contribute their expertise to current political and social debates. As one of the leading investors in non-performing loans and an expert in the processing of outstanding receivables, and especially as part of the Otto Group, this is part of the EOS corporate philosophy. Wherever we operate, we work towards market regulation in order to guarantee a clear quality standard. Where laws have already defined the actions of industry, we expressly endorse them and help develop them further. We are the point of contact for politicians and liaise with consumer protection organizations and associations. We make our many years of experience in receivables management available in hearings, consultations and technical discussions – always transparently and with an open mind.

To improve the reputation of the debt collection sector, we engage with associations (e.g. the Federation of European National Collection Associations) to convey a realistic picture of debt collection: fair, friendly and transparent.

At the same time, EOS can be the target of either official requests or even more intrusive measures by official bodies at times when there is a potential doubt as to whether activities conducted by us may be problematic in some way. We are always committed to working with the authorities as warranted by law and at the same time to protecting our clients to the extent legally required.

DO's

Public affairs

- Where possible, EOS companies are members of the respective national collection associations and take part in their activities.

Interaction with authorities

- If there is a formal request from an authority (government office, police, public prosecutor), which is somehow out of the ordinary everyday business, always refer those requests to your Legal Department or your Management.
- If there is a search/raid, always follow the local guidance on this matter, but in general:
    - Ask them to show their search warrant and inform your Management/Legal Department.
    - Take the persons involved into an office/meeting room and stay with them till the designated company representative (Management/Legal Counsel) is present.
    - Stay calm and respectful.
    - Cooperate to the extent obligated.

DON'Ts

Public affairs

- In situations where no official EOS position has been agreed upon and you are clearly identifiable as an EOS employee:
- Don't adopt party-political positions and do not make any corresponding statements.
- Don't contradict and oppose any parties or party-political positions.
- This doesn't apply when acting in your capacity as a private citizen.

Interaction with authorities

- Don't obstruct any searches conducted by authorities provided they adhere to the scope of the search warrant. If they seem to overreach, inform them accordingly and ask them to confirm in writing your objection to their actions.
- Don't provide inaccurate or inconsistent information with regard to requests for information from authorities.

RISK INDICATORS

Public affairs

- Working in a highly regulated jurisdiction.
- Having overly authoritative and/or bureaucratic supervising authorities.

Interaction with authorities

- Authorities regularly searching/raiding competitors.

3.4 Communicating on behalf of EOS

Everything any of us says or does in an EOS role or from an EOS position affects EOS as a company and therefore also reflects back on our clients, partners, defaulting payers, and everyone working with us. We therefore strive to be very consistent about what someone may say on behalf of EOS and under what circumstances. Yes, we want to be heard and we are transparent, but this doesn't mean that anyone should be the official messenger of their individual position in relation to EOS. We want to speak with one distinct voice, at least regarding the subjects that matter most.

DO's

- In situations where you are clearly seen and understood as employee of EOS, only express preapproved messages or politely refrain from answering questions on behalf of EOS. If you would like to give your personal opinion and you are sure that this is not in conflict with EOS interests, clearly state that you are answering in your capacity as a private person only.
- While taking part in discussions on social media regarding our business, make clear that you work for EOS and that you are stating your personal opinion, not that of EOS.
- If you are not sure how to communicate on behalf of EOS, please consult the Corporate Communications & Marketing Department.
- Whenever you are invited to give a lecture or deliver a speech on behalf of EOS, you should first obtain authorization from your manager (approval for the platform/event). Additionally, in cases of uncertainty, you can also approach the Corporate Communications & Marketing Department.
- Always use professionally compiled information and documents with the corporate design.

DON'Ts

- In general, and if not specifically appointed to do so by your Management or the Corporate Communications & Marketing Department, do not communicate with the media/press/reporters. Rather, politely inform them that we have a Corporate Communications Department that all questions can be referred to.

RISK INDICATORS

- Giving interviews about EOS / debt collection / debt purchase
- Giving a speech or a lecture in connection with your position at EOS
- Publishing articles or documents containing information about EOS
- Being recognizable on social media as an EOS employee

4 Corporate Responsibility – being part of our society

We are convinced that debt collection can generate real added value. Our ambitious aspirations are put into practice with a clear goal in mind – **"Changing for the better"** for our customers, partners, defaulting payers, and ourselves.

In this respect, EOS focuses on four central fields of action that are taken into account throughout this Code of Conduct:

Responsible Collection: **How can we change debt-filled lives for the better?**

> We treat our defaulting payers respectfully and fairly and provide solution-oriented, sustainable debt relief.

Joint Progress: **How can we change society for the better?**

> We take on social responsibility – both within our own company by promoting empowerment, diversity, and inclusion and society-wide through educational initiatives.

Environmental Protection: **How can we change climate for the better?**

> We work with focused and quickly implementable measures so that we can achieve our goal of climate neutrality by 2030.

Financial Sustainability: **How can we change the debt collection business for the better?**

> We take the initiative in promoting high and binding standards in the industry as well as guidelines for responsible conduct.

4.1 Labor and working environment

It goes without saying that EOS respects all relevant national labor regulations. But we also take account of the labor principles of the UNGC which consider the standards of the International Labor Organization (ILO). At EOS we strive for a diverse and professional workforce by promoting a pleasant working environment, offering fair remuneration, supporting diversity and not tolerating discrimination. We also facilitate a fair and open working culture where feedback, suggestions for improvement and personal development are not only appreciated but also desired and encouraged.

In addition, the intertwining of this Code of Conduct with our heartbeat principles makes clear, that all our actions have to be in compliance with them. We therefore expect everyone to live up to these heartbeat principles and to strive for mutual appreciation, respectful interaction and a healthy, modern and stimulating work environment which we embrace as key drivers to our success.

All of this encompasses:

- Our commitment to diversity and equal treatment in respect of ethnicity, gender, sexual identity, religion, national and social origin, political opinion, age or disability.
- Assurance of occupational safety and health protection.
- The creation of an open, trustful and pleasant working environment.
- Elimination of all forms of forced/compulsory labor or child labor.

DOs

- Offer fair remuneration.
- Promote diversity.
- Where feasible, offer flexible solutions for the compatibility of family and work (e.g., flextime, mobile working, working from home, etc.).
- Lead by trust and cultivate a constructive handling of errors.
- Create space for innovation/connect with other departments.
- Address unpleasant issues and conflicts directly.
- Give and demand feedback.
- Always pay attention to occupational safety and health protection at the workplace.

DON'Ts

- Don't establish labor relations without making relevant elements and obligations of the employment contract transparent and understandable.
- Don't force employees to work overtime on a regular basis.
- Don't keep expertise, knowledge, or important information to yourself unless based on confidentiality requirements.
- Don't prevent the right of workers to freedom of association or discourage open dialogue with regard to the negotiation of contractual conditions.
- Don't harass, bully, or discriminate anyone in any form:

  e.g.
  - Don't make jokes about their appearance, sexual orientation, religion etc.
  - Don't talk down to someone or treat them as inferior to you. We expect all employees at EOS to always act in a respectful manner.
  - Refrain from any actions that harm someone else just to make yourself look better. In particular, don't spread lies and don't sabotage the work of others.
  - Never threaten, or even physically attack someone. There is a zero-tolerance policy at EOS regarding threats and attacks of any form.

RISK INDICATORS

- High labor turnover rate
- Regular high overtime hours
- Low wage level
- Failure to exploit synergies due to missing information – double work
- A rise in employee health issues/sick days

4.2 Environment

As part of the Otto Group, which has always stood for sustainability and doing business responsibly, we assume responsibility in continuing to further develop EOS as an environmentally friendly group. Although when thinking about companies that can easily make an impact on environmental developments, you'd probably not initially think about EOS because our core business does not rely on the use of our natural resources.

Nevertheless, we are convinced that the biggest impact can be achieved by communicating general awareness, by changing our own conduct and ultimately, by acting as a role model for others. This starts by thinking about the little impacts we have on the environment due to our regular habits, business processes and daily routines and continues with changing and improving them in a way that follows a sustainable and environmentally friendly approach by using resources sparingly and consciously.

DO's

- Encourage employees to use environmentally friendly means of transportation (e.g. public and alternative transportation) by providing attractive incentives and creating the necessary conditions
- Wherever reasonable, aim for a paperless solution and, if paper is necessary, use environmentally friendly paper products
- Always consider providing employees with hardware with a good energy efficiency rating and make sure all devices (servers, computers, mobiles, televisions, etc.) are set up so as to use the minimal amount of energy needed (e.g., standby mode, dynamic load balancing, energy-saving mode, automatic shutdown).

DON'Ts

- Don't offer disposable plastic cups, bottles or cutlery
- Don't buy incandescent bulbs but opt for energy efficient solutions like LED lamps
- Don't fly, if you can achieve your objectives using digital solutions or if other means of transport with better environmental efficiency are available and reasonable

RISK INDICATORS

- Operating in a country with a low level of or quasi non-existent environmental protection laws
- Operating in a society with no awareness for limiting its ecological footprint

4.3 Human Rights

Our conduct is based on integrity and compliance with laws, regulations and therefore also with the Universal Declaration of Human Rights. We follow in the footsteps of the tradition started by our parent company, Otto, and we are committed to acting against any kind of human rights violations resulting from the sphere of our operations and conduct.

Human rights comprise civil liberty and political rights as well as the pursuit of human dignity and, no less important, respect. Sadly, the incorporation of these fundamental rights into the relevant national laws has not been achieved everywhere or is not a matter of course in many countries. Wherever we operate we always ensure that we act in compliance with these fundamental human rights. This also includes our self-imposed aspiration to only work with partners and clients who pass our KYC checks and where we have no indication of any human rights violations.

DO's

- Before entering into and whilst in a business partnership make sure that the partner is not enmeshed in human rights abuses or (other) criminal conduct. If you find evidence that points towards violations or if you are unsure, you can seek advice from your colleagues in the Compliance Department
- When engaging in associations, work towards market standards which ensure human rights

DON'Ts

- Don't engage in or contribute to human rights violations of any kind
- Don't treat anyone inequitably or disrespectfully

RISK INDICATORS

- Operating in a country that is known for being vulnerable to human rights abuses or in a country that has not ratified the human rights treaties of the International Bill of Human Rights
- Finding negative reports or articles on potential business partners during your business partner screening or during collaboration with them

5 About this Code of Conduct

5.1 What is special about this Code of Conduct

Our Code of Conduct is basically a living document. It is constantly reviewed and amended based on the changes in our corporate culture and because we strive to be a self-learning organization. However, the basic framework is stable and clearly defined.

All changes in subjects and values which change the framework must be approved by the Executive Board. All changes regarding do's, don'ts, risk indicators, examples, conduct descriptions can be changed subject to the approval of the Chief Compliance Officer.

As we strive to make this Code of Conduct a living and breathing document reflecting how we and our environment are constantly changing and adapting, we invite everyone to share experiences, stories and feedback in general to achieve this goal. You can truly help us to keep this Code of Conduct as up to date, consistent and appealing as possible.

5.2 Why you should check out our Code of Conduct on a regular basis

Our partners and clients want to know who we are and how we work:

At EOS we have high expectations of ourselves. But what may be obvious to us, may not be so obvious to our partners and clients (contingency clients/NPL portfolio sellers). We know who we are. We constantly identify what it is that essentially holds our company together and makes us strong. We therefore have clear ethical principles and values which have been set down in this Code of Conduct, to form the basis of our actions and hence of our corporate culture. Every employee, wherever they are in the world, commits to our ethical principles. This commitment to our values shows how we will cope with present and future challenges.

We love to learn:

As one of the EOS heartbeat principles clearly defines, we love to learn. Because our Code of Conduct is dynamically adapted and refined based on changes in our culture or based on upcoming new examples and contents. This Code of Conduct provides:

- examples of how to and how not to act,
- examples of situations where there is a need to be cautious,
- practice-driven examples,
- relevant guidelines, as well as
- training and supporting materials.

This Code of Conduct therefore enables us to find the right way to act in specific situations. Consequently, from time to time or whenever we have doubts, we check this Code of Conduct or consult the Compliance Department. In addition, awareness training on the different topics covered by our Code of Conduct is conducted on a regular basis.

Our defaulting payers want to understand our commitment:

As suggested by our goal, "changing for the better" we strive to engage with our defaulting payers on an equal footing. We work for our clients to collect the debt, but at the same time we try to find feasible solutions for our defaulting payers to finally get them debt-free. This commitment to engage with our defaulting payers in a respectful manner is also part of this Code of Conduct.

5.3 Violations, whistleblowing, and investigations

This Code of Conduct is a summary of numerous applicable laws, policies, agreements, instructions, and directives, which can have serious legal and disciplinary implications for EOS, its employees, and other stakeholders.

In any case of uncertainty, we draw on the relevant information pools, guidelines, or work instructions or consult our Compliance Office to prevent violations from occurring in the first place and to avoid legal implications for EOS and ourselves.

Detecting potential violations

Possible risk indicators for potential noncompliance are part of this Code of Conduct and can be found under each topic.

Moreover, we keep ourselves well informed and always make good use of our critical thinking skills. If something seems strange or unusual to us, we always try to find a solution and do not turn a blind eye. Whenever we can reasonably do so, we follow up on the situation ourselves. However, if there is a personal risk involved, we hand the situation over to a superior or the Compliance Office. Also, we do not confront suspected persons on our own, but instead always involve other responsible persons in resolving the situation.

Acting in the case of suspected violations - Whistleblowing

There are several ways to report an uncovered violation internally so that our specialists can investigate the case to find the reasons for noncompliance and to adjust our procedures accordingly.

The decision regarding whether to report the case locally or to the EOS Corporate Compliance Officer must be made by the person who became aware of the situation because this person can best determine which contact person is the most suitable for the case concerned.

To enable a quick response, you should bring possible cases of misconduct and infringements to the immediate attention of the EOS Investigation Panel using the following EOS or Otto Group whistle-blowing channels:

Confidential reporting through EOS Corporate Compliance:

compliance@eos-solutions.com

Names or other details of the parties involved may be identifiable, but will not be disclosed.

Anonymous reporting (for employees and external partners) is possible through the

Otto Group Whistleblowing System "Speak Up"

or through the

Otto Group Ombudsman:

dr-buchert@dr-buchert.de

Tel.: +49 (0)69-710 33 33 0

+49 (0)6105-92 13 55

Handling of Indications and Investigations

If the potential misconduct is related to managing directors or the first management level beneath it or if the resulting damages exceed € 10,000 EOS Corporate Compliance needs to be involved as quickly as possible.

The EOS Investigation Panel thoroughly investigates all leads that are reported through the whistle-blowing network or in any other way. Furthermore, illegal actions are generally referred to the authorities. The decision regarding whether a case is handled internally through our Investigation Panel or handed over to the respective authorities depends on the specific situation.

At EOS, we ensure a safe and trustworthy working environment where potential violations can be reported without fear of negative consequences and anonymously if desired. We always protect the identity of the whistleblower by keeping the information strictly confidential. We encourage our employees to report violations at any time within our culture of transparency and integrity, and we review cases for substance using clear criteria. If an external body should be involved after our review, we facilitate this to always ensure full clarification. EOS also makes it clear that any reprisals against whistleblowers must be refrained from.