

1. Applicability

Business ethics and integrity are essential to our credibility with all stakeholders. These are in accordance with our sustainable corporate philosophy, our mission and our values. All employees of VICI AG International are bound by the regulations of this document, which describes our principles and line of action. We commit to upholding ethical values, honesty, lawfulness and fairness. VICI AG International is committed to working with business partners whose values and behavior are consistent with those of VICI AG International. Our business partners are required to communicate these expectations to their business partners.

2. Compliance

Compliance with all for VICI AG relevant laws, regulations, directives and standards is a result of our social responsibility. Especially antitrust and competition laws, money laundering laws, the Federal Act against Unfair Competition, quality and environmental standards, safety and health at the workplace, the Swiss Ordinance on Due Diligence and Transparency, as well as the labor law.

3. Ethics

Honest dealings among business partners are essential for solid and long-lasting business relationships. An anti-bribery and anti-corruption policy is in place in all business areas. VICI AG International selects its business partners under fair conditions. Decisions are based on social, ecological and economic aspects. Conduct and business practices by unfair means will not be tolerated.

4. Gifts and Benefits

As a matter of principle, the employees of the VICI AG International are not permitted to give or accept gifts, gratuities or other benefits that could influence business decisions or create the appearance of such influence. Invitations must remain within the limits of customary business hospitality. We therefore ask our business partners to refrain from giving gifts and inappropriate benefits to the employees of VICI AG International or to persons in their personal environment. Benefits within an appropriate framework that does not breach legal regulations are acceptable.

5. Human rights

The standard for social interaction in our company was created according to the Swiss Guidelines on Human Rights and the UN Guiding Principles on Business and Human Rights. In our supply chain, we do not tolerate any form of modern slavery, forced labor, human trafficking and child labor as defined by the United Nations.

We allow no business relations to partners who hire their employees under legally impermissible, abusive or exploitative working conditions.

In this context, the cooperation of VICI AG International with its business partners is based on the following principles:

- Equality of man and woman
- Avoidance of any discrimination
- Equal opportunities for all employees
- Fair wages and salaries
- Adequate working conditions
- Working hours and remuneration for overtime in accordance with local law and legislation
- Respect for the legal freedom of association of employees

6. Confidentiality and Privacy

VICI AG International and its business partners mutually respect each other's intellectual property, trade secrets and other confidential, proprietary, or otherwise protected or privileged information and may not use such information themselves or disclose it to third parties. Our guidelines are based on the Swiss Data Protection Act (DSG) and the European Data Protection Regulation (DSGVO). All business data and/or information will always be treated confidentially by the business partners and may only be disclosed to third parties with the mutual written consent.

7. Safety and Health

VICI AG International maintains an occupational safety and health management system in accordance with ISO 45001. Our business partners are required to implement and maintain all safety and health protection measures for their employees and comply with applicable national legal requirements at a minimum. Employees of business partners who visit VICI AG International facilities must comply with VICI AG International's safety and health requirements.

8. Ecology and Environment protection

VICI AG International maintains an environmental management system in accordance with ISO 14001. We are guided by the international goals for sustainable development and the ISO guidelines for net zero greenhouse gas emissions. Our procedures and standards for waste management, the handling of chemicals and other hazardous substances and their disposal, as well as wastewater treatment comply at least with the applicable laws. VICI AG International expects its business partners to consider environmental impacts in their activities and decisions, to promote environmentally friendly practices and to strive for long-term sustainability.

9. Conflict Minerals

VICI AG International comply with the requirements of the RMI (Responsible Minerals Initiative) for the procurement of conflict minerals and expects the same from its business partners. Any involvement in the financing of armed groups in the countries of origin or serious violations of human rights must be excluded.

10. Stewardship and Improvement

VICI AG International and its business partners are committed to social responsibility. We regularly check the correct implementation of the respectively valid legal regulations, take necessary corrective actions and thus ensure compliance and continuous improvement of the implementation of this Code of Conduct. We are guided by the UN Environment, Social and Governance (ESG) targets on economically, environmentally and socially sustainable development applicable to us and report regularly on the progress of our goals.

11. Trade requirements

VICI AG International agrees to comply with all applicable import and export controls, including U.S. export control laws, as well as economic sanctions laws and dual-use goods control regulations. VICI AG complies with all economic sanctions of its country, in particular embargoes or sanctions against countries and controlled products.

12. Implementation

With this Code of Conduct we create the basis for our daily cooperation. VICI AG International expects all employees and business partners to familiarize themselves with the contents of the Code and to act accordingly.

VICI AG International

Christian Mittaz
(General Manager)