

Business ethics and integrity guarantee our credibility vis-a-vis all stakeholders. This is in line with our sustainable corporate philosophy, mission and basic approach. All employees of VICI AG International are bound by the rules of this document, which define our values, principles and conduct. We are committed to upholding ethical values, honesty, respect for the law and fairness. VICI AG International therefore endeavor to only collaborate with business partners whose values and conduct are consistent with those of VICI AG International. Likewise, our business partners are urged to make these expectations mandatory for their own business partners.

1. Compliance with laws

All valid and relevant laws and ordinances must be upheld. In particular, this shall also include antitrust and competition laws, anti-money laundering laws, laws pertaining to business conduct, product quality, environmental standards, safety and health protection at the workplace and employment law as a whole.

2. Proper ethical dealings with business partners

Honest dealings between business partners are essential to maintaining a solid and long-standing business relationship. VICI AG International select their business partners under fair terms and conditions. Decisions are based on objective considerations such as price, quality, services and the reliability and integrity of the business partner. Conduct that results in transactions with unfair means will not be tolerated. The receipt or offering of bribes and kickbacks shall be prohibited.

3. Gifts

Employees of VICI AG International shall be fundamentally prohibited from giving or accepting gifts, donations and other benefits that can influence or appear to influence business decisions. Invitations must be within the scope of customary business hospitality. We therefore request that our business partners refrain from giving gifts and undue benefits to employees of VICI AG International and/or to individuals in their personal environment. There shall be no objection to gifts of negligible value that are given once per calendar year.

4. Human rights

VICI AG International respect international human rights in accordance with the international human rights treaties of the UN and the Council of Europe. In this context, VICI AG International are only interested in collaborating with business partners who also adhere to the following principles:

- Equal treatment of men and women
- Equal opportunities for all employees
- Wages and/or salaries that enable employees to at least cover their basic needs
- Working times and compensation of overtime that are in accordance with local laws and legislation
- Respect of employees' freedom of association

5. Working practices

VICI AG International reject the use of illegal child labor, the exploitation of children and young people and all other forms of improper or exploitative working practices. No relationships shall be maintained with business partners if it is known that they or their business partners let their employees work under illegal, improper or exploitative working conditions.

6. Confidentiality

Business partners shall respect the intellectual property, trade secrets and other confidential, copyrighted or otherwise protected information of VICI AG International and may neither use this information themselves nor disclose it to third parties. All business data and/or information must always be handled by business partners as confidential and they may only be disclosed to third parties with the written approval of VICI AG International.

7. Occupational health and safety

Business partners of VICI AG International are urged to implement and maintain any occupational health and safety measures for their employees that at the very least correspond with the applicable legal provisions. Employees of business partners must comply with the health and safety norms of VICI AG International while staying at the facilities of VICI AG International.

8. Environmental and safety issues

Processes and standards for waste management, the handling and disposal of chemicals and other hazardous materials, emissions and wastewater treatment must at the very least correspond with the applicable legal provisions.

9. Conflict Minerals

VICI AG International expect from their business partners (suppliers) that they comply with all applicable legal regulations for the procurement of conflict minerals. A participation in financing armed groups in the countries of origin or other serious human rights violations must be excluded.

10. Managementsystems

VICI AG International and their business partners must maintain a social responsibility policy. An anti-bribery and anti-corruption policy shall be applied in all business areas. VICI AG International and their business partners shall be responsible for the proper implementation and continuous improvement of the implementation of this Code of Conduct. They shall take corrective measures, regularly monitor compliance with the Code of Conduct and the applicable legal regulations and shall also be responsible for ensuring that all employees are informed of the requirements of the Code of Conduct.

11. Quality requirements

VICI AG International expect that any quality agreements and standards developed in conjunction with business partners shall be upheld at all times.

12. Trade requirements

All applicable export and import controls and economic sanctions laws of any jurisdiction, including export and re-export laws from the U.S. and military end-use in the EU must be upheld. VICI AG will comply with all economic sanctions of its country, including but not limited to embargoes or sanctions against countries and controlled products.

VICI AG International

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