

SHOP APOTHEKE EUROPE Public Affairs Policy

April 2021

Our Public Affairs Policy

1. INTRODUCTION

- 1.1. This Public Affairs Policy was adopted by the Management Board of SHOP APOTHEKE EUROPE N.V. (the Company), and is effective as per 1 April 2021. This Public Affairs Policy will be publicly available on the Company's website.
- 1.2. The policy owner is the Company's Head of Public Affairs.
- 1.3. This code shall apply to all SAE employees or third parties acting on behalf of SAE.

2. PURPOSE

- 2.1. The purpose of this policy is to provide every person working for SHOP APOTHEKE EUROPE, whether or not under an employment contract with the Company or its subsidiaries, including directors, temporary employees, seconded employees and other persons who are on another employer's payroll but who are hired to undertake work for the Company or its subsidiaries, with a clear policy on how SHOP APOTHEKE EUROPE positions itself in the domain of Public Affairs.

3. POLICY

- 3.1. SHOP APOTHEKE EUROPE operates in several European countries. We serve a broad range of customers in these countries, from the young generation to the elderly, from healthy people to those which are chronically ill. Our wide product portfolio and range of services are aimed at ensuring that people can live the healthiest lives possible. Healthcare, digitisation, ecommerce and sustainability are the interfaces in which our activities take place.
- 3.2. SHOP APOTHEKE EUROPE places a lot of value on acting with INTEGRITY and working in a FAIR, OPEN and TRANSPARENT (FIOT) manner. As a company active in multiple countries, we are directly impacted by political decisions, legislation, governmental policies and regulations taken in the countries in which we are active, as well as to those implemented at EU level. We highly value open dialogue with political decision-makers as this is much needed for

the continued growth and success of SHOP APOTHEKE EUROPE. In the end, we are well aware that political decisions can have a direct and immediate effect on our business operations and future strategies.

- 3.3. We define Public Affairs as all actions, communications and the promotion of our interests with politicians, (non-)governmental organisations and other public authorities, (public authorities meaning: authorities established by public law or being entrusted with public duties and exercising the same as their principal activity pursuant to public law) both directly, by SHOP APOTHEKE EUROPE employees, and/or indirectly, through our memberships of associations and external agencies with whom we collaborate. These actions and communications are fully aligned with the company's strategy, goals and positions.
- 3.4. The overall responsibility for interaction and dialogue with politicians and policymakers, on the local, regional, provincial, national or European level, lies with Executive Management (EM), more specifically the CEO, having mandated the Department of Public Affairs (PA) with the necessary company-wide coordination tasks to execute PA and to ensure that relevant department are included in the PA processes. The Department of Public Affairs reports to the Head of PA, who in turn, reports directly to the CEO.
- 3.5. We have defined the basic principles and rules governing the way we act towards external stakeholders. These are defined as follows:
 - We shall refrain in any way from making any payments or offering inducement to any Member of Parliament, government official or political body working in government at any level for whatever reason.
 - Active Members of national or the European Parliament(s) will not be employed in any way by SHOP APOTHEKE EUROPE; employees of SHOP APOTHEKE EUROPE are encouraged to engage in civic and community activities, including participation in the political process, but must do so within their own time.
 - We do not provide any financial support to individual governmental actors. In principle, we will also refrain from providing financial support to political parties. If we deviate from this principle, donations to political parties will be fully disclosed. We shall act at all times with integrity and in an ethical manner.
 - We will identify name and company name if asked.
 - We honour confidential information given by any politician, government official or authority.
 - Unjust and misleading communication and information shall be abstained from.
 - We will not obtain any information in a dishonest way.

- Employees of SHOP APOTHEKE EUROPE shall keep their personal political activities separate from the work they execute for the company.
- 3.6. Because we aim to comply with the applicable standards to conduct Public Affairs, we value a transparent way of communication. For that reason, we are registered in the EU Transparency Register as well as in national registers (if countries in which we are active require us to do so). SHOP APOTHEKE EUROPE will regularly update the required information in such registers to provide accurate and concise information at all times.
 - 3.7. Public Affairs to us means that we refrain from non-compliant behaviour: we uphold a zero-tolerance approach to corruption, violations of good business conduct and breaches of applicable law by both our own employees and other persons, e.g. by our suppliers and business partners. If we have doubts about whether any non-compliant behaviour has occurred, our Compliance Officer shall be informed and closely assess the situation at hand.
 - 3.8. Since we are active in multiple countries, we depend on solid knowledge of political processes and networks in those countries and the EU, for which we collaborate with third parties, such as external public affairs firms and lobbyists. The coordination of such activities lies with the Department for Public Affairs. Engagement of such firms is subject to a process where these firms are checked against possible conflicts of interest, and where a contract is established in which the collaboration is defined. The Department for Public Affairs is responsible for a continuous monitoring of the relationship with the PA firm/lobbyist at stake.
 - 3.9. We are part of various associations to which we pay a membership fee. These associations represent the interests of a broader group of like-minded organisations with the aim of speaking with a collective, coordinated and stronger voice, achieving better results than lobbying as a single company. In case SHOP APOTHEKE EUROPE would not support communications, press releases or position papers issued by such organisations, it will clearly communicate so and inform those external stakeholders that the SHOP APOTHEKE EUROPE position is different from the association position.
 - 3.10. This Public Affairs Policy exists complementary to other relevant company policies, such as the Code of Conduct, which are publicly available on the website of SHOP APOTHEKE EUROPE.