

FC Schalke 04

CODE OF CONDUCT

We live your values.

FOREWORD

FC SCHALKE 04. WE LIVE YOUR VALUES.

FC Schalke 04 is a special club with a clear image of itself. Its origins and traditions are as unique as the passion and tolerance that define it. Together these values form a strong foundation for us to achieve our goals. At the same time, we have to meet the increasing legal and social demands on the club.

It is therefore important that every employee and anyone who represents Schalke 04 take responsibility: for ethical behaviour, fair treatment of one another and the effect of their actions on others. This Code of Conduct specifies binding rules and establishes a shared understanding of those responsibilities.

The content of this code is based on the wellestablished blue-white principles that have defined our actions for over 100 years. In essence, it is about honesty, respect and tolerance. We want to live, strengthen and pass on these values. That is why we have enshrined them in this Code of Conduct.

At the same time, this Code of Conduct forms the basis of our Compliance Programme. Compliance means “adhering to the rules”. At Schalke, this includes ensuring our employees are given the support they need to adhere to the rules. In other words, we do not just set the rules. We also run training sessions and provide contact partners to make the task of compliance understandable and tangible. Compliance is designed to guide us in our day-to-day work.

By doing so, we want to contribute our part in order to make sure that Schalke 04 remains a club to be proud of in the future.

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OUR SELF-IMAGE

SCHALKE STANDS FOR TRADITION, PASSION AND TOLERANCE. OUR MISSION STATEMENT SAYS:
EVERY ONE OF US GIVES OUR BEST FOR THE CLUB. THIS INCLUDES ADHERING TO THE RULES OF THE GAME.
IT APPLIES EQUALLY TO THE TEAM ON THE FIELD AND EVERY EMPLOYEE IN THEIR PARTICULAR WORK.

I. HUMAN RIGHTS

FC Schalke 04 respects and supports the UN Guiding Principles on Business and Human Rights. Furthermore, we commit ourselves to the Universal Declaration of Human Rights, the principles of the United Nations Global Compact and the fundamental labor rights in accordance with the Declaration of the International Labor Organisation in our activities.

II. INTEGRITY

Every employee adheres to legal regulations, contractual agreements and internal rules. It is therefore important that everyone is familiar with the rules that apply to their particular area of work. Foul play will result in disciplinary action. But true integrity demands more. It is about having the right attitude. Sincerity, reliability and credibility are components our self-image.

III. HONESTY

Honesty forms one fundamental basis of our actions. Every employee must report truthfully and act openly and effectively within the team. This requirement to make truthful statements applies equally to our relationships with customers and business partners. Nevertheless, sensitive information is in all cases treated as confidential.

IV. RESPONSIBILITY

Every employee is responsible for upholding the reputation of Schalke 04. In particular our management staff must stand out for their exemplary behaviour. They are responsible for ensuring the relevant rules are applied in their particular area of responsibility and avoiding any breaches of the law that could be prevented by provision of the right information and supervision.

TO KEEP A CLEAN SHEET: ZERO TOLERANCE OF DISCRIMINATION AND HARASSMENT!

V. RESPECT

We treat each other with respect and at eye level. No form of discrimination, sexual harassment, coercion or verbal attacks is tolerated, including any form of intimidating or insulting behaviour. We actively promote tolerance and fairness.

VI. SOCIAL CONSCIENCE

We are conscious of our responsibility to club members and fans and also to social projects and the common good. That is why we set up Schalke hilft!. All donations are handled transparently and in accordance with current laws. Every donation passes through our internal clearing process. Donations from or to individuals or organisations that could damage the reputation of Schalke are not accepted or granted.

VII. OPENNESS

Every employee has the right to point out circumstances that may indicate a breach of current law or internal rules. Such opportunities shall be taken in the interests of both Schalke and the workforce. Schalke has appointed a Compliance contact partner for this purpose and an independent legal advisor, who may be approached in confidence by employees and business partners. Great care will be taken to follow up on any indications of misconduct.

VIII. SUSTAINABILITY

For us, Sustainability is an important investment in the future. We pay attention to social justice, environmental protection and fair working conditions at our company and in our supply chain.

OUR RULES OF THE GAME

WE ARE MEASURED NOT ONLY BY THE ACHIEVEMENT OF OUR SPORTING AND COMMERCIAL GOALS, BUT ALSO BY OUR ACTIONS. FOR THIS REASON, WE HAVE CLEAR IDEAS ABOUT HOW THE EMPLOYEES AND REPRESENTATIVES OF SCHALKE SHOULD CONDUCT THEMSELVES.

I. GIFTS AND INVITATIONS

The exchange of gifts and issuing of invitations may form part of the polite and respectful interaction of any normal business relationship. However, if there is any attempt to exert undue influence on the decision-making behaviour of the recipient, it may constitute a criminal offence.

Against this background, we have developed rules for dealing with gifts and invitations, which are designed to protect staff from any appearance of susceptibility to undue influence. The fundamental rule is that gifts or other contributions may only be accepted or granted if they do not exceed a socially appropriate value. As a general rule, invitations to normal business functions that fall within reasonable parameters may be accepted or issued. We have special rules in place for the practice of accepting or giving away tickets.



II. DEALING WITH PUBLIC OFFICIALS

Particular sensitivity is required in any dealings with public officials, due to strict rules in this sector. The mere offer of any benefit to a public official could be a criminal offence. Public officials include not only civil servants but anyone tasked with performing public administration duties.

Our policy is that as a rule no public official may be offered, promised or granted any benefit. By the same token, no benefits may be demanded or accepted from public officials. Exceptions fall within very narrow limits and generally require the approval of the public official's employer.

III. COMPETITION

Not only on the sport's field, but also as a commercial company, we abide by the rules of fair and unimpeded competition. This applies to topics like Schalke ticket prices. For this reason, contact with other companies that have the aim or outcome of preventing, restricting or distorting competition is prohibited. Employees who are contacted by competitors, business partners or third parties for such purposes must immediately inform their Compliance contact partner or our independent legal advisor.

WE BACK SCHALKE, BUT DO NOT BET ON SCHALKE.

WWW.GEMEINSAM-GEGEN-SPIELMANIPULATION.DE



IV. BETTING BAN

According to the DFL and DFB Charter and their employment contracts, players, coaches and club representatives are not allowed to bet on Schalke 04 matches or competitions involving Schalke 04 teams. We take this one step further, by insisting all employees do not bet on Schalke games. Inhouse sweepstakes are not considered part of it. Furthermore, care must be taken with any insider information about things like transfers, injuries and finances.

TRANSPARENCY PROTECTS:

WE REVEAL ANY CONFLICT OF INTEREST, OF A PERSONAL OR COMMERCIAL NATURE, WITHOUT DELAY.

V. AVOIDING CONFLICTS OF INTEREST

We respect the privacy of our employees and are not interested in personal matters outside the workplace. However, we expect all employees to behave in a fair and loyal manner towards Schalke. For this reason, it is important to keep professional and private matters separate. Personal relationships with a business partner may not lead to preferential treatment of that person, nor may the professional position of an employee be abused for personal reasons.

VI. MEDIA AND PUBLIC RELATIONS

Given our ever-increasing public profile, it is important to tread carefully with the media. For this reason, only members of the Managing Board or employees with designated responsibility for Public Relations are authorised to make public statements. As far as activities via social media such as Facebook, Twitter, internet forums and blogs are concerned, employees are required to treat Schalke and their colleagues, teams, members, fans, customers and business partners with all due respect.



VII. ANTI-MONEY LAUNDERING (AML)

S04 complies with its legal obligations regarding anti-money laundering. Every employee is required to have unusual financial transactions, particularly those involving cash that might raise suspicions of money laundering, reviewed by the Compliance department if there is any doubt.

VIII. COLLABORATION WITH SALES CONSULTANTS

External sales consultants (intermediaries) are sometimes engaged to prepare or finalize business transactions. It is essential to ensure that any payment to a sales consultant is based on a legitimate and verifiable service, which must be adequately described in the contract. Therefore, every contract with a sales consultant must be reviewed and approved in writing by the Compliance team before it is finalized

IX. TAX COMPLIANCE

FC Schalke 04 achieves its tax goals exclusively through legal means and by avoiding questionable tax planning models. FC Schalke 04 also places particular importance on complying with all tax laws, including in the public sphere.

OUR NEED FOR PROTECTION

WE ALSO WANT TO PROTECT OUR TANGIBLE ASSETS – IN EVERY RESPECT. WE OWE THAT TO OUR MEMBERS, FANS AND THE REGION AS A WHOLE. IT IS WHAT ALLOWS US TO CONTINUE DEVELOPING ON A SOLID FOUNDATION, IN BOTH A SPORTING AND COMMERCIAL SENSE.

I. ASSETS

1. Resources

Every employee is responsible for protecting and using our facilities in an appropriate and environmentally sustainable manner. Information and documents may only be duplicated for work-related purposes. Employees are prohibited from taking documents or assets away from club premises without a valid reason.

2. Business travel

A cost-conscious attitude to Schalke 04 financial resources is required for all business travel. Every staff member is responsible for providing complete and truthful documentation of all business expenses.





II. BUSINESS TRANSACTIONS

1. Payments

Significant decisions and actions with financial repercussions must be approved in accordance with our internal rules. Payments by Schalke to business partners must relate to services received. They will generally be made, upon receipt of a proper invoice, by direct bank transfer to a business account of the relevant contractual partner. Schalke only accepts payments from traceable sources.

2. Documentation

In accordance with the relevant legal requirements, all documentation must be complete, truthful, timely and comprehensible. Employmentrelated knowledge may not be falsified or withheld from other authorised employees, unless there is a compelling reason to do so (e.g. duty of confidentiality or secrecy, copyright considerations or data protection provisions). This means that all information must be documented or filed in such a way that any authorised employee is able to find the relevant information within an appropriate period of time.



III. INFORMATION

1. Duty of confidentiality

Confidential information must be treated as such. The confidentiality of information relating to employees and business partners must also be preserved, unless explicit permission has been given to release the information. This duty of confidentiality continues to apply even after the end of the employment or business relationship.

2. Data protection and security of information

Personal data may only be consulted, handled or used where it is permissible to do so. The right of the individuals concerned to access and amend their information or, where appropriate, refute, block or delete it, must be upheld. Every employee is responsible for proper handling of their own electronic access data.



IV. PROTECTION

1. Health

The health of our employees is of extraordinary importance. A strict smoking ban applies to our workplaces and alcohol and other intoxicating substances are also prohibited. As an exception to this rule, moderate consumption of alcohol is tolerated when members of staff are hosting business partners or guests within the Arena.

2. Environment

Protection of the environment and sparing use of natural resources are imperative. For this reason, we constantly strive to reduce our impact on the environment through responsible handling of raw materials, waste volumes and emissions. This includes low-energy consumption within our own work areas.

3. Workplace safety

We take the best possible precautions to avoid hazards, accidents and damage to people or property. In accordance with the legal requirements, we conduct regular workplace safety, risk assessment and health prevention measures. To ensure consistent compliance with these requirements and the best possible processes, all employees are invited to make suggestions for improving workplace health and safety to their Workplace Safety Coordinator.

APPLICABILITY/ CONTACT PARTNERS

This Code of Conduct applies company-wide to all employees of FC Gelsenkirchen-Schalke 04 and its subsidiaries. Any existing rules that do not breach this Code of Conduct continue to apply. Where there is any discrepancy, the stricter of the two provisions applies.

Schalke encourages all employees, members and business partners to raise any issues or concerns they may have openly and directly. Anyone who has questions or suggestions concerning this Code of Conduct is invited to make direct contact with their Compliance contact partner or send an email to: compliance@schalke04.de.



KÖNIGSBLAU



FC Schalke 04