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Introduction

At S IMMO Group there is a strong commitment to responsible management in accordance with the principles of integrity, honesty and transparency. Ethical behaviour and respect for everyone form the basis. Therefore, ethical practice is a core component of the Group's corporate philosophy and we are committed to ethics and transparency in our management structure, corporate reporting and internal procedures and rules. Mutual trust as the underlying conviction forms the basis for constructive cooperation throughout the company and with business partners. In order to optimally meet these strict standards, S IMMO places high demands for responsible and honest conduct on its employees, customers, suppliers, service providers and other contract partners. S IMMO's Code of Business Ethics and Conduct (the "**Corporate Code**") and relating Group's internal rules, as inseparable part of our corporate culture, create the foundation for all of the company's business activities and decisions and openly declare our commitment to obey applicable laws, industry standards and best practices. Our Corporate Code applies to all members of the Management Board, managing directors, managers, employees and members of the external workforce at all companies in S IMMO Group. It is also the basis for the morally, ethically and legally correct behaviour of all employees and agents acting on behalf of the Group, as well as for all members of the Group's corporate bodies and management (employees, agents and members of the Group's corporate bodies and management hereinafter the "**Representatives**"). At the same time, this Corporate Code and application thereof in everyday work life confirms that we consider the highest ethical and legal standards as a natural part of our business and as a prerequisite to further development of our reputation and good relations with our stakeholders, including their confidence in our business.

Compliance with legal requirements

The Group is subject to numerous laws, regulations and standards. All business transactions and processes must therefore be carried out in such a way as to always comply with the relevant laws, regulations, industry standards and best practices in the countries where we conduct our business activities, both formally and in terms of content, and thereby also observing the local social norms.

Observance of fundamental rights, respect and integrity

In accordance with the UN Charter and the European Convention for Human Rights, we see human rights as fundamental values. We are committed to the observance of human rights within our area of influence and reject any form of human rights violations, e.g. the exploitation of workers, forced labour or child labour in our company or by our business partners.

Every employee is responsible for ensuring that human rights and fundamental social standards are not violated in his or her area of responsibility and influence.

We are committed to creating a working environment throughout the Group which is distinguished by openness and mutual respect. The diversity of our workforce is a characteristic we see as an asset which improves our performance. We oppose any form of discrimination or harassment on the basis of gender, skin colour, religion, age, national/ethnic origin, disability or sexual orientation. All employees and applicants are treated equally.

We are all committed to respecting the personal dignity and private sphere of others. Harassment and any form of unwanted physical contact are prohibited.

Our business activities are based, above all, on the following international standards and guidelines:

[The Universal Declaration of Human Rights by the United Nations \(UN\)](#)

[UN Guidelines for Human Rights and Business](#)

[UN Convention on the Rights of the Child](#)

[UN Convention on the Elimination of All Forms of Discrimination against Women](#)

[The Fundamental Conventions of the International Labour Organisation \(ILO\)](#)

The [Guidelines for Multinational Enterprises by the Organisation for Economic Co-operation and Development \(OECD\)](#)

The [ten principles of the UN Global Compact \(UNGC\)](#)

General Principles and Standards of Conduct

Towards Customers

We endeavour to build a partnership with our customers (including tenants) that is consistent with our values, including ethical, social and environmental aspects. We seek to ensure that our customers share these values with us. At the same time, our priority is to maximise the satisfaction of our customers' needs and expectations. We therefore conduct our business with due diligence and focus primarily on protecting and supporting the interests of our customers. We avoid all steps and actions that could compromise our trustworthiness in the eyes of our customers or distort their perception of our services.

As safeguarding infrastructural health and safety compatibility is an essential prerequisite for our customers' satisfaction, we particularly meet the highest customer standards in the area of general safety and fire protection, regularly monitor and evaluate safety-related issues as part of our extensive due diligence activities, carry out regular on-site customer property management and ensure transparency of all measures and work that we carry out for our customers.

We also pay due attention to our customers' complaints and inform them about the handling of complaints, including the remedial measures and actions to be taken. We always favour an amicable solution to disputes. If such an amicable solution cannot be reached, we will inform the customer of all available out-of-court solutions for the dispute in question.

Towards Business Partners

We endeavour to build a partnership with our business partners (including suppliers and lenders) that is consistent with our values, including ethical, social and environmental aspects. We place the same ethical, social and environmental demands on our business partners as we do on ourselves and our Representatives.

We establish and develop honest and correct relationships with our business partners based on mutual trust and abiding to contractual obligations. We prefer long-term relationships with our business partners and enter into relationships only with those adhering to applicable laws and using financial resources not coming from illegal activities. We therefore expect our business partners to comply with all relevant legal requirements and branch standards in their interaction with us. In contractual negotiation and invoicing, we act in fair and transparent manner. We respect right of our business partners on protection of their trade secrets and other confidential information.

Our business decisions are made solely in the interests the Group; personal interests are put aside. In making business decisions, we cannot allow ourselves to be influenced by suppliers that offer or promise us improper benefits and we will not accept such benefits if they are offered to us. Similarly, we do not request that our suppliers grant us any improper advantages. On the other side, we do not grant any direct or indirect unjustified benefits to our business partners, neither as monetary payments nor in any other form. Furthermore, actions may never create the impression that a business partner is influenced.

As part of the business partner selection process, we conduct a risk-based, documented business partner integrity check.

We also expect our business partners in the value chain to conduct themselves with integrity and in full accordance with the law and we work towards ensuring that they are contractually obliged to comply with these behavioral requirements.

We place high demands on the integrity of business partners, which are also incorporated into contractual agreements. We do not work with business partners who or whose acting persons have attracted attention in the past with regard to non-integrity or unlawful business conduct (especially corruption), or we establish measures to ensure integrity and lawful conduct.

For more details, please refer to S IMMO Code of Conduct for Suppliers.

Towards Employees

We recognise and respect all legitimate rights of employees, including participation in trade unions. We create safe working conditions and an environment characterised by trust and mutual respect that enables every employee to develop their knowledge and skills. We strictly adhere to applicable laws for a healthy and injury-free workplace. We invest in the continuous training of our employees and participate in their professional development. We offer appropriate remuneration for the work performed and also reward exceptional performance.

We neither support, nor tolerate any kind of discrimination or harassment, but we support diversity and create conditions for work engagement of disabled individuals. We respect personal life of our employees by facilitating work-life balance. We conduct background checks of candidates as to previous breaches of applicable laws or ethical rules.

On the other hand, our employees are expected to advance the Group's legitimate business interests. They shall not enter into competition with the Group, provide unjustified advantages to any third party to the detriment of the Group or take advantage of business opportunities available to the Group for themselves or for their family members.

Towards Shareholder and Investors

We strive for continuous long-term increasing of value for our shareholders and investors (including bondholders). We apply Corporate Governance rules in order to achieve balanced relationships between shareholders, investors, corporate bodies, executive management, employees, customers and other stakeholders. We provide our shareholders and investors with information on a regular basis in transparent and non-discriminatory manner.

Towards Public Authorities and Regulators

We respect powers and competences of all relevant public authorities and regulators (including the respective stock exchanges), and their rules, decrees, decisions and other acts. We fully comply with applicable tax regulations in all of our countries in a transparent manner. We value cooperative working relationships with public authorities and regulators and therefore provide them with due and appropriate cooperation and information.

Towards Communities as a whole

We endeavour to contribute to friendly and peaceful coexistence in our communities. We are committed to high standards in environmental, social and ethical issues. Our employees are trained in these areas and informed when these principles change. Our environmental policy is to comply with applicable laws while striving for the most energy-efficient solutions possible.

Human Capital

We view our employees as our most important assets, and their well-being is our top priority. We want to be a reliable partner and employer and make a sustainable contribution to employee satisfaction. We offer our employees numerous opportunities for professional and personal development and see benefits such as workplace health promotion or flexible working models as a matter of course.

Employee development

We strive to create a framework for our employees in which they can develop their potential, strengths and competencies to the best of their abilities. We lead our employees in a trusting manner and place great value on open and respectful interaction with each other. We work hard to systematically develop the potential of our workforce for the future of our company. In doing so, we focus on specialised professional training as well as social and methodical skills.

We are committed to creating an inclusive working environment in the Group, characterised by openness and mutual respect where every employee feels valued and heard. The focus is on our attractiveness as an employer and on employee retention. Derived from this, employee development and satisfaction, our social commitment as well as diversity, equal opportunities and inclusion are material topics in this focus area.

Relations with employees and employee representatives

Consequently, we offer a motivating, safe and healthy working environment and strive to continuously improve working conditions and the underlying standards. The health and safety risks to which our employees could potentially be exposed are identified, classified, prioritised and subsequently eliminated or minimised as far as possible.

Our employees are the foundation of our activities. They bring our values to life and their commitment guarantees a high level of customer satisfaction. We aim to create a work environment based on openness and mutual respect throughout the Group.

We respect the rights of our employees for the freedom of association. In our contacts with employee representatives, our goal is to achieve and maintain a long-term constructive dialogue.

Equal Treatment, Non-Discrimination and Diversity

We are committed to creating a working environment characterized by mutual trust, where diversity and inclusion are valued and where each individual is treated with dignity and respect. The Group complies with laws and regulations governing human rights, fair labour practices and other labour law provisions. Personnel-related decisions, such as hiring, promotion or disciplinary actions, must be made free from any discrimination.

We support the right of all people to look for, apply for and perform a job free from discrimination and/or harassment. Needless to say, that we do not tolerate any form of unequal treatment or discrimination based on any characteristics that do not relate to work, such as age, gender, religion, race, skin colour, sexual orientation, nationality, language, political views or other reasons. All forms of harassment and discrimination, for whatever reason, against or carried out by employees, applicants, employees of external companies, clients, service providers and anyone working on our premises are therefore explicitly prohibited.

We firmly believe that a diverse and inclusive work environment benefits not only our employees but also our company as a whole. By valuing and embracing the unique perspectives and backgrounds of our team members, we foster a culture of engagement and open communication. We know that our employees are more likely to work innovatively and share their ideas when they feel valued and included. In this way, they contribute to the growth and success of our company. Therefore, diversity characteristics, especially with regard to age, gender, national or ethnic origin, religion, sexual orientation, disability and educational and professional background are very important to us as an employer.

Business Ethics

It is our policy to comply with applicable laws of each country, where we operate. Our Representatives shall be aware of such applicable laws that impact our business, comply therewith and refrain from any activity, which is non-ethical, illegal or would endanger the safety of others. Our Representatives shall also ensure that their actions cannot be interpreted as being, in any way, in violation of applicable laws, whereas the Group will not condone any activity of any representative, who achieves results through violation of applicable law or through non-ethical business dealings.

Therefore, this Corporate Code elaborates below on crucial legal and ethical issues in order to help the Representatives to be compliant in respect of such issues.

Conflicts of interests

We always act in the best interests of the Group and maintain strict separation between corporate and private interests. We respect the rights of our employees and Representatives to manage their personal affairs and investments, and we do not wish to impinge on their personal lives. However, the goal is to avoid conflicts of interest, meaning situations where personal interests conflict with or could negatively influence the interests of the company and are incompatible with them. Employees receive trainings to create a greater awareness for potential conflicts of interest, which helps to avoid even the appearance of this type of conflict. Decisions are taken in line with reasonable economic standpoints and in agreement with laws and standards.

Even the appearance of a conflict of interests, where none actually exists, can be detrimental to the Group and shall be avoided. This also means that, as in all other areas of their duties, the Representatives working with customers, business partners, competitors or any other persons cooperating with the Group, shall act in the best interests of the Group to exclude considerations of personal preferences or benefits.

We expect our Representatives to be free from influences that conflict with the best interests of the Group or might deprive the Group of their undivided loyalty in business dealings. Otherwise, our Representatives are required to refuse any intervention, coercion or influence that could jeopardize the impartiality of their decision-making relating to our business affairs and, at the same time, to inform their supervisor and the compliance officer. The same notification duty applies, if such representative is uncertain, whether or not a conflict of interests exists or will exist.

For more details please refer to S IMMO Anti-Corruption, Anti-Bribery and Countering of Frauds Policy.

Prohibition of corruption, bribery and countering of frauds

Corruption refers to bribery, corruptibility, the acceptance of benefits and the granting of benefits. Benefits shall always be deemed to be improper if the type and scope of the benefit are liable to improperly influence the actions and decisions of the recipient. Any form of corruption or attempted corruption is expressly prohibited within the Group. Therefore, in particular, no representative shall directly or indirectly

- offer, make, promise or authorize the transfer of anything of value to a public official (or his/her family member) to obtain or retain a business advantage or to influence any decision by such official in his/her official capacity, unless authorised by applicable laws;
- offer, make, promise or authorize the transfer of anything of value to any private person or entity to improperly influence that person in the legitimate performance of his/her expected duties and obligations; or
- accept or receive anything of value from any person, where such thing is offered, promised or given with the intention of improperly influencing the representative to obtain or retain business for the Group or secure an improper business advantage.

Our anti-corruption, anti-bribery and countering of frauds policy include precise rules in particular for the acceptance or granting of gifts, donations and sponsoring, the taxation of benefits and the use of intermediaries. In our business relations, we comply with all applicable rules against corruption, bribery, fraud and money laundering. We do not accept gifts or benefits or enter into investments that could lead to a conflict of interest. Bribes or other illegal payments and benefits may not be accepted, offered or given. Our employees can report any violations of internal guidelines, legal regulations, this Corporate Code or any other form of actual or suspected corruption, bribery and frauds at any time to the compliance officer or through the whistle-blowing system, under their own name or anonymously.

Procurement within the Group shall be conducted in a cost-effective, transparent and non-discriminatory manner and in compliance with applicable laws. Therefore, we expect our suppliers and other business partners to compete fairly and vigorously for our business, and endorse the principles of this Corporate Code and other relevant Group's internal rules. We select our suppliers and other business partners strictly on merit, rather than on improper benefit given or offered. Our Representatives may neither give to, nor accept from, anyone who conducts or seeks to conduct business with the Group, any gift, service or special treatment of any kind, unless:

- It is provided with good intentions and for legitimate business purposes;
- It is consistent with good business practices and ethical standards;
- It is permitted by applicable laws and the Group's internal rules;
- It is permitted by the counterparty's own business policies;
- It is of value not exceeding normal business practices, not in the form of cash payment and cannot be interpreted as a bribe or reward;
- There is no expectation that such special treatment will follow;
- It does not create an appearance of impropriety;
- Potential publicizing the information on providing such gift, service or special treatment of any kind would not be detrimental to the Group's reputation; and
- Providing such gift, service or special treatment of any kind was approved within the Group, if required.

Rules for gifts and hospitality

Group employees may not directly or indirectly request, accept, offer or grant unjustified advantages within the framework of their business activities. The only exceptions are gifts of small value (EUR 100 or less) and invitations within the scope of normal business hospitality. However, giving gifts to or accepting gifts from, as well as providing hospitality to or accepting hospitality from, individuals or entities that we do business with may never collide with rules concerning prohibition of corruption, bribery and frauds (as specified above). Therefore, strict standards must be applied in evaluating such situations, and the compliance officer should be contacted if there are any questions.

Gifts and other benefits to public authorities, government representatives, civil servants, other public officials and other representatives of public organisations are principally prohibited in the sense of the UN Convention against Corruption. Invitations to events for public officials are only permitted under certain conditions.

For more details please refer to S IMMO Anti-Corruption, Anti-Bribery and Countering of Frauds Policy.

Anti-Money Laundering and Counter-Terrorism Financing

The Group's business activities are to be conducted in accordance, and all Representatives shall at all times comply, with applicable laws on the prohibition and prevention of money laundering and terrorism financing. This means, among others, that we must always have thorough knowledge of the business partners we do business with. In addition, we take steps and measures to prevent misusing our services for money laundering and terrorism financing.

For more details please refer to S IMMO Anti-Money Laundering and Counter Terrorist Financing Policy.

Competition, antitrust and conduct on the market

We are committed, without limitation, to fair competition with our competitors, business partners and other market participants. We are also committed to observing the laws against the restriction of competition in all countries where we conduct our business activities. Agreements with competitors and coordinated practices that are intended to limit or prevent competition are prohibited. In all contacts with competitors, it is important to ensure that no information is communicated, received or exchanged that could lead to conclusions over current or future market behaviour.

Competition and antitrust laws prohibit activities that can limit competition. This includes, for example, agreements between competitors regarding prices, boycotts or the allocation of certain business partners or supplier groups. Negligent behaviour, such as casual discussions with a competitor's employees regarding prices, markets and business partners, for instance during a professional event, can also be considered a legal violation. Violations of competition and antitrust laws may result in severe penalties and significant fines against the Group. There may also be sanctions against individual Representatives, including substantial fines and prison sentences.

Hence, our employees may not limit customers in any way or form in designing their supplier relationships or prices. Participation in associations and attendance at their events may only take place for legally permitted purposes. Any comparison with competitors and the exchange of information must comply with the applicable laws.

If our employees should become involved in situations which are considered questionable under antitrust law, the discussions must be terminated immediately. The employee must leave the location and inform the compliance officer.

Handling of confidential information

One of our most important assets is confidential (or otherwise privileged) information, including our internal information and trade secrets. Such information, notwithstanding whether developed by us or provided to us by our customers, suppliers or other business partners, may include the list of current and prospective customers, suppliers or assets of the Group, the financial and technical information concerning the Group's assets (e.g., period of renewal of leases, rents and expenses, financial projections, maintenance level of buildings and projects, or information relating to future disposals or acquisitions of assets), as well as training and organizational documents.

We handle information responsibly and only share it with authorised persons. Each representative shall comply with applicable information protection laws, which implies that each representative has a duty to refrain from disclosing confidential information, unless and until that information is released to the public through approved channels, or unless he/she obtained the approval of the responsible member of the Group's management to disclose the confidential information. Additionally, before disclosing such information, the individual or entity receiving the information shall enter into a confidentiality or non-disclosure agreement with the Group. The aforesaid also requires that the Representatives shall refrain from discussing confidential information with outsiders and even with other Representatives, unless those fellow Representative have a legitimate need to know the information in order to perform their duties.

Our employees may therefore not divulge any information on issues involving the company when these issues are not expressly intended for the general public. This also applies to information received confidentially from third parties. Employees may not use confidential information for their own benefit or for the benefit of third parties.

Be also aware that unauthorized posting or discussion of any confidential information concerning the Group's business or prospects on the internet is prohibited, and all e-mails, voice mails and other communications within the Group are presumed confidential and shall not be forwarded or otherwise disseminated outside the Group, except where required for legitimate business purposes. The Representatives leaving the Group shall return to the Group all confidential information in their possession, as unauthorized keeping, use or distribution of such information could be illegal and result in civil liability and/or criminal penalties.

Finally, the Representatives shall take care not to inadvertently disclose confidential information. For this reason, all materials that contain confidential information, (e.g. memos, notebooks, computer disks and laptop computers), shall be stored securely.

Prohibition of securities frauds and insider trading

We do not share any insider information with unauthorised persons. Our internal compliance guideline defines insider information as precise information that is not available to the general public which could be directly or indirectly related to one or more issuers or one or more financial instruments and, if it were known, would be capable of significantly influencing the price of this financial instrument or the price of a related derivative financial instrument because a knowledgeable investor would probably use the information as part of the basis for his or her investment decision.

The Compliance Guideline provides instructions on the responsible handling of insider information on the company. Accordingly, insider information is subject to the strictest confidentiality and must be reported immediately to the compliance officer, also when the information is only potentially considered insider information. Persons with insider knowledge are prohibited by law from trading in the respective securities. Furthermore, insider lists, confidentiality areas and blackout periods for trading in the company's securities are established to provide special protection for insider information. The "need-to-know" principle is also followed, meaning insider information can only be passed on – also internally – when this is necessary for business purposes and distribution is limited to the absolutely necessary scope and each representative shall exercise care to keep such information secure from unnecessary or unintended disclosure, including disposal of documents containing such information. Confidentiality agreements regulate the non-disclosure and handling of confidential information with third parties.

The unlawful use or disclosure (distribution) of insider information or market misuse has consequences under employment and labour law.

Detailed regulations are provided in our Compliance Guideline.

Participation in public procurement and public tenders

We comply with laws on public procurement and public tenders, if applicable to us. Therefore, we apply zero tolerance policy in respect of any illegal or non-ethical practices relating to public procurement and public tenders, including bribery, corruption and frauds.

Protection of intellectual property

We recognize and respect the intellectual property rights of other persons and entities, and fulfil all ethical and legal obligations concerning use of intellectual property.

We require the Representatives to respect the copyrights, trademarks, patents and other intellectual property rights of all persons and entities to any material (including material downloaded from the internet and computer software), through:

- using all proprietary information, property and rights only for the purposes, for which they are intended and approved for use; and
- avoiding copying, improper use or distribution of any work subject to intellectual property rights without the owner's prior permission,

as violations of the above may result in civil or criminal liability for the Group or the Representatives.

On the other hand, the Group reserves all rights to any intellectual property, including patents, trademarks and copyrights, developed by the Representatives on the Group time or utilizing the Group's resources during the course of their relationship to the Group.

Use of information technology and protection of personal data

We always use information technologies responsibly to protect data on S IMMO, its employees and all business partners. S IMMO places high priority on the legally and ethically correct utilisation of information systems and gives high priority to IT security and data protection. Employees are required to consistently use all available security measures to protect S IMMO's data.

We comply with applicable laws on privacy and data protection, including Regulation (EU) No. 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR).

We collect and retain personal data only to the minimum extent and for proper purposes as required by applicable laws and the Group's operation need. We also take all necessary or appropriate steps and measures to comply with applicable laws to safeguard and fairly process personal data, to

maintain the confidentiality of personal data and prevent any accidental destruction, alteration, modification, loss, misuse, unlawful use or processing of, or unauthorized access to, personal data.

Certain Group companies have appointed Data Protection Officers, having the functional and organisational responsibility for compliance with applicable laws and the Group's internal rules on personal data protection. The Group companies and their Representatives shall report any alleged breach of applicable laws or the Group's internal rules on personal data security to the relevant Data Protection Officer.

Legal requirements to protect personal data are always strictly observed. Personal and other sensitive data must be treated confidentially and may only be used as far as this is necessary to carry out the corresponding tasks or disclosed in accordance with instructions issued by the Executive Board, the Financial Market Authority or the courts. This data may only be administered by authorised personnel.

Appropriate organisational measures have been implemented to ensure confidentiality – e.g. restrictions on access, distribution, file sharing and copy restrictions as well as physical separation. High diligence standards must be followed. The distribution – also within the company – of confidential information is based on the “need-to-know” principle: This information may only be distributed when it is necessary for business and corporate activities, and distribution must be limited to the necessary scope.

Use of Group's assets

The Group's assets, facilities and services provided to the Representatives are for professional use only. Without prior authorization it is forbidden to take possession of or use Group's assets for personal gain or advantage, to alter, remove or destroy Group's assets, or to use the Group's services or equipment for personal purposes. Also, the Group's landlines and cell phones, e-mail services, internet access and other equipment and subscriptions must be used primarily for professional purposes. Concerning access to the internet, it is forbidden to download non-professional data or to visit websites, whose content is unlawful or could be otherwise detrimental to the Group's reputation.

Political involvement, lobbying and public policy

We encourage our Representatives to get involved in civic affairs and participate in the political process. This is a way in which we can all practice good citizenship and make meaningful contributions to our communities. However, any political activity by the Representative must be done solely in his or her personal and private capacity and not on behalf of the Group, must be done solely on his or her own time, and must not harm the reputation of the Group.

In addition, it is explicitly prohibited to use Group resources or funds to campaign for elected office or make a contribution to a political party or candidate. Representatives seeking elected or appointed public office must consult the compliance officer to ensure that they understand the Group's internal rules and potential legal consequences and can manage potential conflicts of interest, including anti-bribery and anti-corruption compliance requirements.

Our lobbying activities are always conducted responsibly and in accordance with the respective code: S IMMO has issued a [code of conduct for lobbying activities](#). It defines the principles for the transparent and responsible exercise of lobbying activities – specifically, compliance with legal regulations, integrity, respect, transparency, confidentiality and the prohibition of acts of corruption and other improper behaviour. All lobbying activities on behalf of the Group may only be carried out by persons who are duly authorised to do so. Such activities must never damage the Group's reputation or violate the rules prohibiting corruption, bribery and fraud (as set out in the section above on the prohibition of corruption, bribery and fraud).

We always act in accordance with the law, honestly and accurately in our interrelations with political institutions and legislative and executive bodies. Integrity, transparency and compliance with the basic democratic order are requirements for the work of all in-house lobbyists of the Group. We register all in-house lobbyists in a public register, if required by law. Accordingly, lobbying expenditures are also disclosed in accordance with applicable legal requirements.

In order to articulate and pursue the interests of the Group, we do not exert any unfair, improper, inappropriate or illegal influence on function holders, in particular neither through direct nor indirect financial or other material incentives. We avoid any behaviour that could damage the reputation of the Group.

Protection of good reputation

We react as quickly as possible to the inquiries and concerns of our shareholders and the media because maintaining good relationships is important for the Group's reputation. Inquiries from investors and the media concerning the company and its business activities should be passed on to the head of investor relations/corporate communications without delay. Communication is, in principle, the responsibility of the Executive Board. External communications are managed and carried out centrally by corporate communications (CC). Proprietary or non-public information may not be released without the approval of the Executive Board. Corporate communications may draw on experts from other specialist areas to serve as interview partners or speakers on specific technical issues.

We disclose only true, accurate and not misleading information. The Representatives may not provide any information to the media or public about the Group and its work, regardless whether off-the-record, for background only, confidentially or secretly. All inquiries or calls from the press shall be referred to the corporate communications of S IMMO.

Accounts on the social networks under the Group's brand can be established only with prior consent of the Group. Information published by the Representatives on the social networks via their private accounts may not be detrimental to the Group's reputation, but each representative shall strive to protect and enhance the Group's reputation.

Rules for charity and sponsorship

We believe that charity and sponsor contributions are important to the communities, where we operate. We respect our local communities and do our best to broaden recognition of the Group's capabilities to improve community relations.

Therefore, we provide addressed financial support for non-profit and charitable purposes as well as for environmental, social, educational and scientific purposes and local community engagements, however, never in order to obtain illegal or non-ethical benefit or advantage. We always keep neutral apolitical position and never provide financial or other support to political parties or movements.

Zero tolerance of misconduct

Misconduct and violations of anti-corruption laws and internal ethical requirements can have severe consequences not only for the individual personally, but also for the entire Group. The Group disciplines deliberate, unlawful misconduct and violations of internal guidelines consistently, regardless of the rank or position of the person involved. Perpetrators will be sued for reimbursement of all damages suffered.

Also, Business Partners have to expect appropriate consequences in case of breach of contractual compliance obligations or violations of anti-corruption laws.

Accounting, taxation, reporting and records retention

The Group duly complies with all accounting, tax and reporting obligations, as given by applicable laws, including obligations towards the respective stock exchanges. We always act honestly and only distribute truthful information for internal and external reporting purposes. In order to maintain a high level of trust with shareholders, employees, business partners and the general public over the long-term, the reporting must always be correct and truthful and comply with the relevant laws. Bookkeeping and accounting records are kept in accordance with legal, official and tax regulations and in agreement with internationally accepted accounting standards.

The Group's books, records and other documents serve as a basis for managing its business, and are important for meeting its obligations, including accounting and tax obligations and those towards customers, suppliers and other business partners and stakeholders. Therefore, the Group protects and maintains its books, records and other documents in compliance with applicable laws and the Group's internal rules. Additionally, each

representative is responsible for managing documents and records under his/her control, including that documents and records are maintained in consistence with applicable laws and the Group's internal rules, and for avoiding the inadvertent disposal of such documents and records. On the other hand, each representative shall appropriately dispose of non-essential documents and records, which are not needed any more (such as duplicate copies, reference files or drafts).

The integrity of the Group's books, records and other documents depends upon the validity, accuracy and completeness of the underlying information, including invoices, time reports and other inputs. Therefore, all such underlying information must be properly recorded, classified and summarized in accordance with the Group's internal rules, which, in turn, shall comply with generally accepted accounting principles and applicable laws. Making any false or misleading entries on any Group's books, records or other documents, including financial reports, test reports or time reports, is strictly prohibited.

Any payments made or received by the Group must be promptly and accurately recorded in the books. No payment on behalf of the Group shall be approved without adequate supporting documentation, nor made with the intention or understanding that any part of such payment is to be used for any unlawful purpose. Finance and accounting officers of the Group have a special fiduciary responsibility to ensure that the Group's finance and accounting practices support the full, fair, accurate, timely and clear disclosure of the Group's financial condition and results of operations.

Environment and Corporate Social Responsibility

We are a major player on the European commercial real estate property market, which gives rise to a particular responsibility for us – in economic, social and ecological terms – towards our stakeholders, the environment and society. Our business model is therefore oriented towards long-term, sustainable value creation in line with environmental, economic and social considerations. Therefore, our ESG roadmap defines a framework to meet important goals related to the environment, social and governance focus areas and points the way into a sustainable future for S IMMO Group.

Responsibility for the environment

The real estate sector has an undeniable impact on the environment, and the environment has an impact on the real estate sector. It is therefore of paramount importance for the Group to conduct its business in accordance with the highest environmental, social and ethical standards, with an approach that is responsible, inclusive, pragmatic and sensible. It is a priority for the Group to promote a sustainable approach to property development and management and to inspire and encourage other players in the sector, be they business partners or even competitors.

Our activities are proactive with a focus on environmentally friendly technologies and the continuous systematic improvement of our company's environmental efficiency. Compliance with applicable environmental rules and regulations is a minimum requirement. Our responsibility for the environment also includes close cooperation with our business partners and support for initiatives that work to create a greater awareness of environmental responsibility.

Environmental considerations are taken into account at all levels and in all areas of our operations, including all phases of the investment cycle, the use of natural materials, innovation, asset management and procurement. At the heart of our efforts are our strategic priorities: high performance standards, energy efficiency, optimised use of natural and other resources, renewable energy sources, environmentally friendly buildings and innovation.

We make great efforts to monitor, report and analyse the available data on our environmental and social performance. To maintain the highest industry standards, we conduct both internal and external audits and reviews. We take environmental concerns into account in the performance indicators, both in relation to the commissioned companies and at Group level.

Corporate Social Responsibility

Real estate is inevitably shaped by and connected to communities and the environment at all times. We are therefore determined to play our part in being responsible, transparent, accountable and promoting accessibility, inclusion and smart livelihoods. We endeavour to adhere to the highest standards wherever possible – both through our Representatives and when sourcing and dealing with our customers, suppliers and other business

partners. We also play our part in society and work continuously to increase the standards along our value chain in terms of sustainability and transparency.

Whistleblower system

We inform our supervisors, anonymously or directly, of conflicts and violations of guidelines and legal regulations. Employees are encouraged to contact their supervisor, the compliance officer or the head of internal audit if they have any questions, potential conflicts or suspected violations. The compliance officer is also available for consultations as an independent ombudsperson.

The company confirms that there will be no negative consequences for employees who report a violation or alleged violation of this code by a member of the Executive Board or a manager. Reprisals against employees who report violations will not be tolerated.

Reports can be filed anonymously over the electronic whistle-blower system. This system is available to all S IMMO employees and can also be used by third parties.

Link: <https://simmoag.integrityline.com/>

The notices received are analysed individually based on specific guidelines established for this purpose. At the end of the procedure, the compliance officer submits a report to the Executive Board and to the head of internal audit on the results of the investigation. This report forms the basis for any consequences as well as recommendations and suggestions for measures to eliminate the deficiencies and prevent the occurrence of similar incidents in the future.

General validity and implementation of the code

As a general rule, the overall responsibility for the pursuing of individual policies comprised in this Corporate Code rests with the Executive Board of S IMMO AG that acts through the compliance officer, unless in any Group's internal rule stated otherwise.

Implementation of this Corporate Code and other Group's internal rules falls within the competences of the compliance officer. In this respect, the compliance officer is responsible for ensuring that all Representatives (and other relevant persons and entities) receive information about this Corporate Code and other Group's internal rules, and for organizing and carrying out internal trainings to increase understanding of the issues governed thereby.

The rules of this code apply to all members of the Management Board, managing directors, managers, employees and members of the external workforce at all companies of the Group. If conduct rules have been issued as separate guidelines for individual areas or companies, these rules apply without limitation in addition to the Corporate Code. In case of doubt, the stricter rules take precedence.

On operative level, it is the responsibility of each managing employee to ensure that this Corporate Code and other Group's internal rules are complied with within his or her area of responsibility. The compliance officer reports on a regular basis to the Executive Board of S IMMO AG on the implementation of this Corporate Code and other Group's internal rules, compliance therewith, and related issues and incidents, if any. Compliance with this Corporate Code and other Group's internal rules is also subject to the Group's internal audit, and is overseen by the Executive Board of S IMMO AG, if appropriate.

This Corporate Code is an attempt to point all of the Representatives in the right direction, but no document alone can achieve the level of principled compliance that we are seeking. In reality, each of the Representatives is personally responsible for his/her actions and must actively seek out and absorb the relevant information, strive every day to maintain his/her awareness of the relevant issues and comply with the Corporate Code's principles

and spirit to the best of his/her abilities. Hence, we expect each and every employee to feel personally responsible for compliance with this Corporate Code.

We are committed to providing employees with the necessary support and assistance for continuously implementing this Corporate Code. All new employees receive training in the Corporate Code and our guidelines as part of their onboarding. In addition, the Corporate Code and related guidelines are part of annual compliance training. Any Representative being uncertain about how to apply or interpret any information set forth in this Corporate Code or other Group's internal rules, is encouraged to refer the matter to, or seek the advice of, the compliance officer. Should not be the compliance officer competent or able to answer or handle the respective query, he/she will refer the representative to the competent officer or department.

As a general rule, any breach of applicable laws, this Corporate Code or other Group's internal rules is to be reported, unless in any Group's internal rule stated otherwise, to the compliance officer or through the whistle-blowing system. The compliance officer, in turn, will inform the Executive Board of S IMMO AG on material breaches, so that proper investigations and adequate steps and measures are undertaken.

Consequently, any violation of the Corporate Code or other Group's internal rules will not be tolerated and any representative, who violates the standards set forth in this Corporate Code or other Group's internal rules may be subject to disciplinary action, which, depending on the nature of the violation and the history of the respective person, may range from a warning or reprimand to termination of employment or other relationship and, in appropriate cases, civil legal action or referral for regulatory or criminal prosecution.

The Executive Board of S IMMO AG

Legal Note

This Corporate Code represents the fundamental position of S IMMO. It cannot be interpreted as the basis for requiring specific actions from or justifying contractual claims against S IMMO.

Compliance Office

Lucia Kautzky, Compliance Officer, can be contacted at any time for confidential consultations as follows: +43 699 1685 7259 or at lucia.kautzky@immofinanz.com.