

## **CODE OF CONDUCT OF HAMBORNER REIT AG**

### **Foreword**

HAMBORNER REIT AG takes great responsibility in the context of its business activities, in particular towards its shareholders, employees, business partners and towards society and the environment. We must prove the legitimacy of our business activities to the stakeholders of our company and to each other every day. Values such as trust, responsibility and dependability form an important basis for our success.

Above and beyond the rules of legally compliant business, this Code of Conduct outlines our principles of individual responsibility, honesty, loyalty and respect for our fellow people and the environment. These principles are intended to define and guide the actions of all employees of HAMBORNER REIT AG in their day-to-day work.

The Code of Conduct provides the employees of HAMBORNER REIT AG with binding guidance for their decisions, their conduct and their actions. However, despite being set out in writing, the Code of Conduct can endure only if we practice the principles it formulates at every level of our hierarchy. Thus, in implementing this Code of Conduct, the company's management must assume special responsibility as a role model.

The sphere of our rules of conduct should extend beyond the boundaries of our own organisation. We also expect our suppliers, business partners and their subcontractors to ensure fair working conditions, respectful and dignified manners and ecologically sustainable processes along the entire value chain, of which we are all a part.

This Code of Conduct is supplemented by other, more detailed policies, the Code of Conduct for Business Partners and possibly by individual contractual regulations.

### **Compliance and integrity**

The employees of HAMBORNER REIT AG undertake to comply with the applicable laws and regulations of the sector in which they operate. Furthermore, our employees are required to regularly seek out information on any updates to the relevant laws, provisions and business regulations that affect HAMBORNER REIT AG and its business partners especially, to comply with them, and to assist in the internal and possibly external sharing of information.

The company's standing with its customers and business partners is defined largely by the demeanour of its employees. All employees should therefore always pay attention to the effects of their own actions on the reputation of HAMBORNER REIT AG.

In conjunction with its compliance management, HAMBORNER REIT AG uses internal control systems that guarantee compliance with laws, provisions and internal regulations in addition to protecting the company's property.

In the event of non-compliance with laws and provisions, which could jeopardise or call into question the company's integrity, every employee is required to immediately contact the Management Board or their direct supervisor and to ask for help.

### **Protection against harassment, abuse and discrimination**

HAMBORNER REIT AG provides its employees with a working environment in which every individual is valued and respected. Behaviours that penalise or discriminate against individual persons or groups of persons are not tolerated.

Protecting the physical and mental well-being of all employees is HAMBORNER REIT AG's top priority. Any form of mental, physical, sexual or verbal harassment or abuse is strictly rejected.

Employees must not be discriminated against in terms of their areas of responsibility or remuneration on the basis of their sex, nationality, ethnic origin, religion or beliefs, disability, age, sexual orientation or identity.

### **Employee rights**

HAMBORNER REIT AG implements all applicable provisions of labour law and ensures that all employee rights and fair working conditions are safeguarded. Personnel decisions – such as recruitment, promotions or disciplinary measures – must always be made on a purely objective, transparent, legitimate and legal basis.

The Management Board and the Works Council of HAMBORNER REIT AG are committed to open and constructive cooperation, and strive for a fair balance of the interests concerned in all cases.

### **International human rights**

As HAMBORNER REIT AG's business activities are concentrated on the German market, the company primarily acts in accordance with German law and complies with the German provisions on human rights due diligence. International labour standards and the prohibition of child and forced labour are strictly observed in any international business relationships and everywhere that HAMBORNER REIT AG can influence this. Breaches of human rights are thus prevented and full compliance with national and international provisions is expected from all employees and business partners in this respect.

### **Prohibition and prevention of corruption, bribery and gratuities**

HAMBORNER REIT AG is firmly and actively opposed to any form of corruption, bribery or illegal gratuities. The approach to invitations, disproportionate hospitality, (cash) gifts or other benefits is guided by the principles of legal compliance, responsibility, appropriateness and social adequacy.

The recipients must not become obligated as a result. This applies both to gifts and gratuities from the company itself and those from business partners and contractors.

HAMBORNER REIT AG employees receive regular training as a preventive measure and to ensure that the prohibitions and provisions on corruption, bribery and gratuities are widely understood. The regulations are also outlined in a compliance policy.

### **Fair competition**

Strict adherence to competition and antitrust laws and provisions is self-evident for HAMBORNER REIT AG. Employees are strictly prohibited from taking any actions that could impair fair competition. At the same time, employees are forbidden from working for direct or indirect competitors of HAMBORNER REIT AG while they are employed by HAMBORNER REIT AG.

### **Confidentiality, data protection and information security**

All employees of HAMBORNER REIT AG must keep business secrets and sensitive information confidential. This applies both to information about HAMBORNER REIT AG itself and to information about its tenants and business partners that is identified as confidential or not publicly known. Business and private information must be kept confidential both while working for the company and after employment has ended.

The provisions of data protection law must be implemented by all employees of HAMBORNER REIT AG at all times. Any violations of applicable data protection guidelines, or suspicions of the same, must be reported directly to supervisors and the company's data protection officers.

Information security is a matter of great importance at HAMBORNER REIT AG above and beyond the statutory provisions. State-of-the-art technology, the skills and responsibility of its employees and the corresponding expertise of its executive bodies form the foundations for the secure handling of information at HAMBORNER REIT AG.

### **Health and safety**

The safety of its employees, business partners and customers is HAMBORNER REIT AG's top priority. The company's occupational health and safety provisions are extensive and must be obeyed and actively supported by all employees. This applies to measures for the protection of occupational health and safety in its own offices and at all other (external) work sites.

At HAMBORNER REIT AG, internal responsibility for health management and occupational safety lies with the dedicated Work Health and Safety Committee, which consists of the safety officers, the Management Board, a representative from the Works Council, the company doctor and external security experts.

All employees are required to contribute towards the continuous optimisation of health management and work safety at HAMBORNER REIT AG, and to ensure their health and safety of their co-workers, business partners and customers in the context of their work.

## Environmental protection

HAMBORNER REIT AG strives to minimise the impact of its business activities on the environment and to continuously optimise its ecological footprint in conjunction with its value chain. HAMBORNER REIT AG's environmental management will be expanded to achieve this goal with measures for all key business areas.

In addition to compliance with all applicable environmental protection laws in Germany, employees are encouraged to support the implementation of HAMBORNER REIT AG's environmental protection objectives and to regularly seek out information on the latest developments in this regard (e.g. in the latest sustainability report). Furthermore, all employees should advise customers and business partners of the potential for optimising the environmental impact of their business activities and, in individual cases, to obtain proof of the use and certification or environmental management systems (primarily ISO 14001 or EMAS).

All employees of HAMBORNER REIT AG are called on to heed the efficient and careful handling of all resources, and to contribute towards the improvement of environmental protection through new technologies, procedures and materials.

## Compliance with the Code and measures in the event of breaches

Breaches of the above principles and instructions will be assessed and possibly sanctioned in conjunction with existing laws and internal regulations. Severe violations can lead to the termination of contracts without notice. The principles of this Code take precedence over any contradictory instructions from superiors.

All employees are required to report breaches of the Code to their supervisors in good faith. Alternatively, employees can use the electronic whistleblower system implemented by HAMBORNER REIT AG in 2017 to report potential breaches of compliance rules and of this Code of Conduct. The whistleblower system can be used by the company's own employees and third parties to report misconduct within the company's sphere of influence, straightforwardly and anonymously, to an external ombudsman.

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Niclas Karoff  
CEO



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Hans Richard Schmitz  
COO/CFO