As of March 2024

CODE OF CONDUCT FOR BUSINESS PARTNERS OF HAMBORNER REIT AG

Foreword

In conjunction with its value-adding mandate, HAMBORNER REIT AG takes responsibility towards society and the environment. In doing so, we are guided not just by the applicable laws and standards that apply to our industry and beyond, but also by the rules and principles set out in the HAMBORNER REIT AG Code of Conduct, which also form the basis for our day-to-day work.

However, the sphere of our rules of conduct and principles should not be limited to our own activities and organisation. Rather, we also expect our business partners and their subcontractors to strictly comply with all applicable anti-corruption, money laundering, antitrust, competition, capital market, labour, data protection and environmental protection laws. Furthermore, we expect them to ensure fair working conditions, respectful and dignified manners and ecologically sustainable processes in the value chain of all our partners.

The publicly accessible Code of Conduct of HAMBORNER REIT AG comprises rules of conduct and principles for the following areas:

1. Compliance and integrity
2. Protection against harassment, abuse and discrimination
3. Employee rights
4. International human rights
5. Prohibition and prevention of corruption, bribery and gratuities
6. Fair competition
7. Confidentiality, data protection and information security
8. Health and safety
9. Environmental protection

This document should therefore be seen as a supplement to our Code of Conduct and acknowledged by our business partners.

Confidentiality, integrity and avoidance of conflicts of interest

HAMBORNER REIT AG carefully maintains business relationships and always pays close attention to mutual respect, trust, honesty, openness and integrity.

If, in the context of our cooperation, our business partners receive information from HAMBORNER REIT AG not already published by the company itself, this information must be treated as confidential and must never be shared or independently published without HAMBORNER REIT AG's explicit consent. If confidential information is disclosed by error, business partners are required to inform their contacts at HAMBORNER REIT AG of this without delay.

In the event that they maintain business relationships with competitors of HAMBORNER REIT AG, we expect our business partners to implement effective internal safety measures to guarantee both the confidential handling of information and the avoidance of conflicts of interest.

Furthermore, we expect that our business partners will never offer the employees of HAMBORNER REIT AG gratuities or financial perks in the hope of influencing employees' decisions or actions in their favour.

Statutory minimum wage and working time regulations

HAMBORNER REIT AG expects its business partners to adhere to the statutory regulations on minimum wage in remunerating their employees. We also expect clear regulations on paying employees for overtime (hours worked in excess of those stipulated in their employment contracts).

Our business partners should comply with the statutory working time regulations. These include the prescribed maximum limit on working hours for the protection of employees, set rest period and breaks plus statutory regulations on public holidays.

Health and safety standards

We take it for granted that statutory occupational health and safety provisions will be complied with. Our Code of Conduct also includes the occupational health and safety rules that apply at our company. Accordingly, all employees are required to contribute towards the continuous optimisation of health management and work safety at HAMBORNER REIT AG.

We also expect our business partners and their employees to strictly obey the statutory requirements for occupational health and safety and to conduct themselves in a manner that considers the health and safety of all people directly or indirectly affected by their value chain. Occupational health and safety due diligence should also include instructions and training for employees for the active prevention of work accidents and work-related illnesses.

Regarding the international business relations of our partners, we expect them to exercise due diligence for the protection of persons involved in their value chain on the basis of the international labour standards of the International Labour Organisation (ILO).

Human rights due diligence and the prohibition of child and forced labour

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. In conjunction with any cross-border business activities, we always consider the applicable international labour standards and the prohibition of child and forced labour.

We also expect our business partners to fully comply with national and any international provisions on human rights due diligence, the monitoring of compliance with the prohibition of child and forced labour in conjunction with their business relationships and to examine potential business locations and suppliers as regards any risks of human rights violations or child and forced labour.

Freedom of association

In accordance with German legislation, HAMBORNER REIT AG expects its business partners to allow their employees the freedom and the right to form a works council or to participate in employees' representation and to conduct collective bargaining with the business partner.

Environmental protection and origins of materials

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 all value chains.

In addition to complying with all applicable environmental protection laws in Germany, we therefore expect our business partners and suppliers to advocate for the environmental sustainability of their own and joint business activities, and to take adequate measures to avoid potential environmental hazards.

We expect our partners to handle all natural resources efficiently and carefully, and to continuously improve environmental protection through new technologies, procedures and materials. Where possible, environmentally conscious alternative solutions should be considered for all technologies, procedures and materials required in the value chain and presented/offered to HAMBORNER REIT AG.

Furthermore, we expect our business partners to strive to reuse and recycle materials. The sources and properties of goods and materials supplied to HAMBORNER REIT AG by its business partners should always be transparent. Goods and materials must never be sourced, produced or transported by illegal, ecologically unsound or unethical means.

The employees of HAMBORNER REIT AG are required to advise business partners of the potential for optimising their environmental impact and, in individual cases, to obtain proof of the use and certification or environmental management systems (primarily ISO 14001 or EMAS). We expect the necessary willingness to cooperate and transparency from our business partners in this regard.

Compliance with the Code and measures in the event of breaches

Our business partners ensure compliance with the rules of conduct and principles as described in the Code of Conduct of HAMBORNER REIT AG and this document. We also expect our business partners to communicate these rules of conduct and principles to their own subcontractors and service providers, to require them to obey them and to monitor their compliance.

Breaches of the rules and principles of the Code of Conduct of HAMBORNER REIT AG and this supplementary Code of Conduct for Business Partners can lead to the immediate termination of business relationships and the termination of contracts without notice.

HAMBORNER REIT AG operates an electronic whistleblower system that can be used by its employees and by its business partners and other persons. This whistleblower system can be used, straightforwardly and anonymously, to report misconduct within the sphere of influence of the company or its business partners, potential breaches of compliance rules or breaches of the rules and principles of the Code of Conduct of HAMBORNER REIT AG and this supplementary Code of Conduct for Business Partners to an external ombudsman. The whistleblower system satisfies all applicable data protection and security requirements.

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