# Consolidated Non-financial Statement for the 2018 Financial Year

The core business of IMMOFINANZ is the management and development of retail and office properties in selected Central and East European countries. The portfolio comprised 226 properties with a total value of EUR 4.3 billion as of 31 December 2018. In the office sector, the company with its international myhive brand concentrates on the capital cities of the core countries and the major office locations in Germany. The office portfolio was responsible for 61.7% of the total portfolio value and 52.9% of the rental income from the standing investments at the end of the 2018 financial year. The expansion of the retail portfolio is based on the STOP SHOP and VIVO! brands which are designed, above all, for secondary and tertiary cities. The retail portfolio was responsible for 35.3% of the total portfolio value and 47.0% of the rental income from the standing investments at year-end 2018. IMMOFINANZ's goal is to compile and maintain a high-quality, profitable portfolio of commercial properties. Additional details are provided under *Portfolio report*.

The Austrian Sustainability and Diversity Improvement Act ("Nachhaltigkeits- und Diversitätsverbesserungsgesetz") requires IMMOFINANZ to publish a non-financial statement or non-financial report for the 2018 financial year. This requirement is met with the following chapter.

This report covers IMMOFINANZ AG and all consolidated subsidiaries (see note 8 in the *consolidated financial statements*). Unless otherwise indicated, it is not based on any framework and was not subjected to an external review.



# MATERIALITY ANALYSIS

The selection of the reportable content and the calculation of current and potential future indicators are based on a materiality analysis which was carried out with the support of various corporate departments in 2017 and is also valid for 2018. An internal workshop was held to identify and categorise the major issues related to the company's positioning, products and services as well as the impact of its activities. These issues were subsequently aggregated into four areas. Also addressed were issues which are regularly reviewed by various rating agencies.

The analysis reflects the significance of these issues not only for the company, but also for its internal and external stakeholders (shareholders, tenants, employees, suppliers and business partners). In addition, it includes surveys of tenants and employees as well as criteria which are important to investors and service providers in the ESG area (Environmental Social Governance). The list of the key issues includes energy efficiency and resource conservation in the standing investments and development projects together with the related cost savings, sustainable investments in the quality of the standing investment portfolio, sustainability certifications, tenant satisfaction and the related attainment and protection of high occupancy levels, human resources development and employee satisfaction, diversity in the workforce, a responsible procurement policy and compliance and anti-corruption.

The following individual areas of responsibility were defined:

#### > Environment

IMMOFINANZ is committed to the responsible use of natural resources, the utilisation of climate-friendly technologies, a systematic energy savings strategy, the refurbishment of building substance which is worth preserving and the construction of efficient new buildings. An increase in sustainability certifications and sustainable energy management are two of the most important issues in this area.

#### > Customers/tenants

Central strategic focal points are the creation and maintenance of tenant loyalty through high customer satisfaction and the acquisition of new tenants. The IMMOFINANZ brands represent a service and quality promise which support these efforts. Investments in the quality of the properties and a strong customer orientation are further important issues.

#### > Employees

The expertise and commitment of its employees are key requirements for IMMOFINANZ's long-term success. Numerous activities in the area of human resources create an environment in which talents can optimally develop and cooperation is promoted at all levels.

## > Responsible business practices

IMMOFINANZ is committed to business practices that are based on integrity, honesty, fairness, transparency and responsibility. Compliance and the fight against corruption, a sustainable procurement policy and human rights represent the basis for all activities.

Detailed information on the individual areas, the underlying goals and measures as well as potential risks is provided in the following sections.

# RESPONSIBILITY TOWARDS THE ENVIRONMENT

IMMOFINANZ is committed to the responsible use of natural resources, the utilisation of climate-friendly technologies, a systematic energy savings strategy, the refurbishment of building substance which is worth preserving and the construction of efficient new buildings. These central points reduce operating costs and emissions and also make an important contribution to environmental protection and tenant satisfaction.

Corporate goals include the steady reduction of energy consumption as well as an increase in the energy efficiency of the standing investment portfolio and the related energy savings. Prior to the start of new activities or projects, the related environmental impact is estimated and the results are integrated in the decision process. Plans also include the gradual expansion of sustainability certification for development projects and standing investments. These certifications reduce environmental risks and help to improve the environmentally friendly use of space and an increase in efficiency.

## SUSTAINABILITY CERTIFICATIONS

Certification according to environmental standards is currently planned for development projects and standing investments in the office and VIVO! portfolios. Office buildings are generally certified according to BREEAM and LEED, while shopping centers are generally certified under BREEAM.

BREEAM (BRE Environmental Assessment Method) is the leading and most frequently used certification method for buildings. It defines the highest standards for sustainable design and has become the de facto benchmark for describing the environmental impact of a building. In 2018 the following IMMOFINANZ office buildings received BREEAM certification: *myhive Thirteen (Xenter)* in Budapest, *myhive Brama Zachodnia* and *myhive IO-1* (both in Warsaw) and *myhive Twin Towers* in Vienna.

There is no certification according to international standards for the STOP SHOP retail parks, but the strict standards for construction and furnishings define wide-ranging criteria for sustainable construction.

The certified space totalled approximately 472,000 sqm at the end of 2018, which represents 26.0% of the space in the standing investment portfolio (year-end 2017: 350,000 sqm, resp. 18.0%). Moreover, approximately 120,000 sqm in standing investments and development projects were under evaluation or in the certification process at the end of 2018.

#### Example.

The Twin Towers and a further office building at the myhive location on the Wienerberg - IMMOFINANZ's largest office site in Vienna with more than 150.000 sgm of rentable space - received the BREEAM standing investment certificate with an overall rating of "four stars" (i.e. "very good") for the buildings in 2018. The evaluation criteria include, for example, materials (among others, condition and maintenance strategy), transport (among others, connections to public transportation, convenience stores and gastronomy, secured and covered bicycle parking, medical care), energy (among others, energy certification, examination of the exterior facade, share of renewable energies), water (among others, consumption, flow volumes), environment (among others, use of polluting materials in the building), grounds and ecology (examination of the exterior design of the grounds and green areas) as well as health and wellbeing (among others, transparent facade areas, ventilation and common rooms).



## SUSTAINABLE ENERGY MANAGEMENT

Energy efficiency is not only a function of the building itself. On the contrary, the energy and water consumption in the properties managed by IMMOFINANZ is heavily dependent on tenant behaviour and, consequently, largely outside the company's control. Plans call for the gradual expansion of control measures in this area through clear communications, for example the posting of information signs in the properties.

As a means of optimising energy efficiency, the standing investment portfolio is undergoing an energy audit. The goal is to identify potential sources of increased energy consumption and define appropriate countermeasures. The audits of 33 standing investment properties in 2017 were followed by similar inspections at ten standing investments in the Czech Republic and Romania (approximately 164,000 sqm in total) during 2018. Structural and building technology optimisation measures were then implemented with the support of energetic analyses. The goal for 2019 is to carry out energy audits at a minimum of ten standing investment buildings.

Opportunities for energy savings are regularly developed in cooperation with the property and facility managers. Examples of the results are the conversion to LED lighting, the replacement of cooling equipment and the upgrading of washbasins with aerators which reduce the waterflow.

Following is an overview of the energy and water consumption in the office and retail portfolio during 2018. The indicators are based on 64 office properties with approximately 1.0 million sqm of rentable space and 80 retail properties with approximately 800,000 sqm (70 STOP SHOPs and 10 VIVO!) and, therefore, do not cover the entire standing investment portfolio.

It should also be noted that most of the tenants in the VIVO! shopping centers purchase their entire energy requirements from IMMOFINANZ. This practice differs individually in the STOP SHOP retail parks.

	Office <sup>2</sup>	Retail <sup>3</sup>
Heating <sup>1</sup>	129,402,311 kWh	45,826,163 kWh
Electricity	153,997,194 kWh	128,229,239 kWh
Water	520,957,870	454,190,137 l

- Hot water and gas
   KW data excluding electricity purchased by tenants
   Data on KWh/electricity includes the electricity for common areas, tenants and ventilation (for cooling and heating).

#### **FURTHER MEASURES**

IMMOFINANZ is working to meet the rising demand by tenants for sustainable mobility offerings. Activities include, for example, cooperation with car sharing providers and the installation of e-charging stations and weatherproof bicycle parking areas.

## POTENTIAL RISKS FOR THE ENVIRONMENT AND SOCIETY

Buildings are a major cause of greenhouse gas emissions. IMMOFINANZ is therefore working continuously on comprehensive measures to safeguard and improve the energy efficiency in its standing investments. For development projects, energy efficiency becomes an important issue as early as the planning phase. Development projects or modernisation activities can also have an impact on the environment through the use of harmful building materials. Here IMMOFINANZ makes sure construction is sustainable with highly standardised descriptions for buildings and furnishings as well as the careful selection of business partners.

## **SUMMARY AND OUTLOOK**

The IMMOFINANZ portfolio has been the focus of an optimisation and concentration process in recent years, which led to the concentration on two asset classes and three brands as well as the sale of properties that no longer fit with the corporate strategy. The next step began in 2017 with the development of a group-wide, standardised recording process for energy consumption data.

The goal is to continuously reduce resource consumption, while maintaining or improving the quality of building use through energy savings measures. This will help to realise energy savings and reduce the environmental impact and risks.

Another objective is to expand the space in the standing investments which is covered by sustainability certifications. Compliance with project development and refurbishment standards is guaranteed by the Development Process Guideline. It applies to all companies in the IMMOFINANZ Group and regulates construction-related activities.

# RESPONSIBILITY TOWARDS TENANTS AND CUSTOMERS

The satisfaction of IMMOFINANZ's tenants is an essential factor for achieving and maintaining high occupancy levels and strong tenant loyalty. This, in turn, is the guarantee for efficient property management. Tenant loyalty through high customer satisfaction and the acquisition of new tenants therefore represent a strategic focus of activities. In 2018 the occupancy rate in the standing investment portfolio rose from 94.2% to 95.8%.

## **BRAND POLICY AND INVESTMENTS IN QUALITY**

The IMMOFINANZ property portfolio follows a clearly defined brand policy: myhive represents the offices of the future, STOP SHOPs are retail parks and VIVO! are full-featured shopping centers. These brands are a quality promise to tenants and create security and trust. A high degree of standardisation based on extensive criteria catalogues for presentation, furnishings and design also supports a sustainable procurement policy.

The myhive office brand, which was introduced at the end of 2016, was rolled out to further IMMOFINANZ office buildings in 2018. myhive offices are characterised by a wide range of services and top infrastructure and provide space for communicative and lively interaction between tenants - for example through attractive communication zones, tenant lounges and regular events like after-work get-togethers, business breakfasts with expert discussions and the organisation of sport activities (also see the detailed description in the brand section).

Networking between tenants is given particularly high priority. Designated community managers are responsible for supporting exchanges between tenants, identifying possibilities for cooperation, brokering the necessary contacts and organising events (among others, sport activities). A specially designed, international myhive office app was also introduced. It provides a wide range of information on the latest events in the respective office building and in the myhive community, promotes communication between experts in different companies at the same location and also supports IMMOFINANZ's central services, for example through a direct feedback tool. In this way, tenants can register for events, submit suggestions and requests, and also file damage reports quickly and easily.

In order to hold the occupancy rate and customer satisfaction at a high level over the long-term, IMMOFINANZ makes targeted investments in the quality of its properties. Improvements were made during 2018, for example, in the *myhive Crown Tower*, Warsaw, and the *myhive Polus Towers*, Bratislava, in connection with the myhive roll-out.

IMMOFINANZ's investments in the STOP SHOP retail parks are directed to improving the quality of service and the quality of stay in order to optimise the shopping experience. The related measures include, among others, the addition of playgrounds, free WLan and a gastronomy offering in the form of a café at selected locations. In 2018 playgrounds and cafés were added to a number of STOP SHOP locations. The improvements at the individual locations are made in close coordination with tenants and also reflect any special local shopping habits.

## **EVALUATION OF CUSTOMER SATISFACTION**

IMMOFINANZ has carried out regular tenant surveys in its office properties for many years to evaluate customer satisfaction. Based on the results, individualised optimisation measures are then implemented at the respective locations. The design of the new myhive office brand also reflects the suggestions and requirements defined by these surveys. The tenant survey in 2017 was carried out in all of IMMOFINANZ's seven core office markets. The focal points included an evaluation of the customer orientation as well as satisfaction with the quality of the property and the related infrastructure, services and communication.

In the retail sector, visitor surveys are carried out at regular intervals – normally once each year – in the VIVO! shopping centers. The focal points include the catchment area, demographic data, purchasing behaviour and the brand recognition of the respective shopping center, satisfaction with the offering and branch mix as well as ideas and suggestions for improvement. These results and conclusions from the frequency counts in the individual retail property are shared with the tenants and flow into measures to optimise the branch mix, improve the arrangement of tenants and increase frequency.

#### **CUSTOMER ORIENTATION**

"Triple 90", an internal initiative, was launched in 2018 to increase the customer orientation in the entire organisation. Employees throughout the company registered to participate in innovation groups, which then developed suggestions to improve the focus on customers. The best concepts were announced at the end of the year and will be gradually implemented. One recommendation, for example, was to define annual service targets together with the tenants.

## POTENTIAL RISKS

The loss of a dissatisfied anchor tenant in the retail sector or difficulties in re-letting and the resulting reduction in visitor frequency could have an impact on other tenants or reduce the offering. IMMOFINANZ minimises this risk with a high customer orientation and proactive rental management.

#### SUMMARY AND OUTLOOK

Plans for 2019 include the above-mentioned measures as well as the further strengthening of customer orientation, among others through digitalisation. The customer relationship management (CRM) application currently in roll-out includes, among others, a service and sales module which can be used in the future to measure tenant satisfaction in the office and retail properties, as well as a ticket system to support the faster and more efficient recording of customer inquiries.

The Asset Management Process Guideline regulates all procedures related to rentals, beginning with the initial tenant contact to ongoing tenant support.

# RESPONSIBILITY TOWARDS EMPLOYEES

The expertise and commitment of its employees are key requirements for IMMOFINANZ's long-term success. Numerous activities in the area of human resources create an environment in which talents can optimally develop and cooperation is promoted at all levels. These activities are directed, in particular, to underscoring IMMOFINANZ's attractiveness as an employer and to retaining and further developing employees. Risks associated with qualifications and expertise are addressed and minimised with the measures described below.

## CONTINUOUS HUMAN RESOURCES DEVELOPMENT

In the area of human resource development, training is focused on technical as well as social and methodological skills. An important instrument for management is the annual appraisal discussion between employees and their supervisors, which includes the definition of clear goals and individual training activities. As in previous years, IMMOFINANZ also made a wide range of training and continuing education programmes available to its employees in 2018. The human resources department is responsible for ongoing personnel development as well as the preparation of a succession plan for key positions in the core areas. A total of 11,427 training hours were completed in 2018, which represent 34.6 hours per employee (FTE). Language courses account for most of these hours (46%), followed by external training courses and seminars.

## **IMMOFINANZ ACADEMY**

The IMMOFINANZ Academy is the corporate institution for training and continuing education, with individual instruction in the form of specific courses and group programmes serving as important elements. Internal courses led by IMMOFINANZ experts are also part of the curriculum. Examples include workshops on the brand strategy and the IMMOFINANZ Real Estate Training series.



## TRAINING PROGRAMMES

With the apprenticeship programme started in 2016, IMMOFINANZ offers ambitious young men and women training opportunities as real estate agents ("Immobilienkaufmann") and finance/accounting assistants. The "Young Professional" talent promotion programme, which was established in 2017 and successfully continued in 2018, is directed to students and recent university graduates. It follows a rotation scheme and concentrates on knowledge transfer in the operating business and finance departments.

The Leadership Curriculum represents the Group-wide training series for managers, in which individual modules deal with various management issues. The internal exchange and transfer of know-how provide support for employees in management functions. In this way, IMMOFINANZ creates optimal development opportunities for managers.

## HEALTH MANAGEMENT AND WORK-LIFE BALANCE

A company physician holds regular office hours at the headquarters in Vienna. Her responsibilities include, among others, compliance with legal requirements as well as vaccination drives, preventive medical check-ups and eye examinations as well as consultations on healthcare issues – all of which are intended to address typical office medical problems on a timely basis.

IMMOFINANZ also provides wide-ranging support for its employees outside the workplace: teambuilding and promotion for the work-life balance represent key elements. Included here are sport offerings like participation in the Vienna City Marathon or Business Run, coaching vouchers and various voluntary employee benefits.

#### ATTRACTIVE EMPLOYER

These many initiatives in the area of human resources have received considerable attention: On kununu, the largest employer ranking platform in Europe with over 3.2 million ratings on more than 850,000 companies (as of February 2019), IMMOFINANZ was graded above-average.

#### KUNUNU SCORES IN COMPARISON

	As of February 2019			As of January 2018		
	Ranking	Points	Gradings	Ranking	Points	Gradings
IMMOFINANZ	****	4.16	166	****	4.15	128
Branch – average (Properties/ Facility Management)	****	3.33	29,727	****	3.20	19,235
kununu – average	****	3.36	3,187,000	****	3.23	2,376,000

More information under https://www.kununu.com/at/immofinanz



IMMOFINANZ was rated one of the most valued employers in the branch by "Beliebter Arbeitgeber", a study conducted for the first time by Milestones in Communication, Faktenkontor and IMWF Institut für Management-und Wirtschaftsforschung GmbH. This report was based on the 1,800 companies in Austria with the largest workforces and covered various branches. Employees' opinions on their working climate, corporate culture and careers were collected from social media during the period from February to July 2018 and analysed. The ratings are based on comments by the employees who work in these companies every day and who share their opinions online with their community.

In the study "BEST-RECRUITERS 2018/2019" (carried out by BEST RECRUITERS | CAREER Verlag, Vienna), IMMOFINANZ was ranked second in the real estate segment and awarded the BEST-RECRUITERS seal in bronze. The issues analysed here included the company's online recruiting presence, online job advertisements and interaction with candidates. Positive factors included, among others, the speed and efficiency of the application process.

## **EMPLOYEE STRUCTURE**

IMMOFINANZ had a total workforce of 333\* in nine countries as of 31 December 2018 (31 December 2017: 406), which represents an annual average\*\* of 345.2 (2017: 470). Employees from 14 nations currently work for IMMOFINANZ.

# TOTAL NUMBER OF SALARIED EMPLOYEES BY EMPLOYMENT AGREEMENT (PERMANENT AND TEMPORARY) CLASSIFIED BY GENDER

## 2018

Total number of employees: 333 (thereof temporary: 3)



#### 2017

Total number of employees: 406 (thereof temporary: 10)



# TOTAL NUMBER OF SALARIED EMPLOYEES BY EMPLOYMENT AGREEMENT (PERMANENT AND TEMPORARY) CLASSIFIED BY REGION

	2018	3	2017			
Countries	Headcount	thereof temporary	Headcount	thereof temporary		
Austria	163		181	6		
Germany	19	3	23			
Poland	38		45			
Czech Republic	24		29	1		
Hungary	28		30			
Romania	34		46	1		
Slovakia	21		25	2		
Serbia	6		5			
Russia			22			
Total	333	3	406	10		

<sup>\*</sup> Excl. Executive Board, employees on official leave, students, trainees, young professionals
\*\* Excl. employees on official leave, excl. Executive Board, calculation based on the absolute number of employees at the end of the months/number of months

## TOTAL NUMBER OF SALARIED EMPLOYEES (FULL-TIME AND PART-TIME) CLASSIFIED BY GENDER

	2018			2017		
Working time	Gender	Fulltime	Part-time	Gender	Fulltime	Part-time
40 hours	Male	135	3	Male	178	5
40 hours	Female	167	28	Female	199	24
Total number of employees		302	31		377	29

## **SOCIAL DIALOGUE**

The employment relationships with the workforce in Austria are governed by the collective agreement for salaried employees in property management companies. IMMOFINANZ has also concluded a number of agreements with the Works Council, which provided added improvements for the workforce. The employment relationships outside Austria comply with the applicable national regulations. IMMOFINANZ places high value on the application of uniform standards in dealing with employees. The Executive Board and the Works Council meet at least once each quarter to discuss the current development of the company, and additional meetings are also organised on short-term notice to consider important issues.

#### POTENTIAL RISKS

IMMOFINANZ minimises the risks arising from employees' health, lack of motivation or continuing education through the above-mentioned measures for human resources development and health management.

#### **DIVERSITY CONCEPT**

Equal opportunity and the equal treatment of employees without differentiation, e.g. according to gender, age or national/ethnic origin, is a matter of course for IMMOFINANZ.

IMMOFINANZ does not follow an abstractly defined diversity concept. The human resources department considers diversity to be very important, in particular with regard to age, gender, national/ethnic origin, religion, education and professional background. Accordingly, specific appointments or recommendations are based not only on criteria like expertise, individual requirements, experience, availability but also on the above aspects.

# RESPONSIBLE BUSINESS PRACTICES

IMMOFINANZ is committed to business practices that are based on integrity, honesty, fairness, transparency and responsibility. Mutual trust as a fundamental understanding forms the basis for constructive cooperation within the company and with business partners. All activities are based on compliance and the fight against corruption, a sustainable procurement policy and human rights.

The Executive Board has approved several corporate guidelines for these areas, which are binding for all employees and member companies of the IMMOFINANZ Group:

The **Corporate Code** serves as the basis for all business activities and decisions in the IMMOFINANZ Group: In particular, it includes guidelines for respecting fundamental rights, integrity and fairness, a ban on discrimination as well as relations with competitors, customers and associations.

The **Anti-corruption Guideline** is based on the UN Convention against Corruption and summarises the principles and rules of conduct for dealing with corruption.

The **Compliance Guideline** covers the legal prohibitions on the use of insider information through insider transactions and the unlawful disclosure of insider information. In addition, an e-learning tool for training on capital market compliance was introduced in 2017. A compliance officer is also available to answer employees' questions at any time. Further details are provided in the consolidated Corporate Governance Report (see page 33).

Regular training courses are held to familiarise IMMOFINANZ employees with the principles underlying these guidelines.

#### SUSTAINABLE PROCUREMENT POLICY

The development of long-standing business relationships based on sustainability and continuity represents the focal point for relations with suppliers and business partners. As an international corporation, IMMOFINANZ worked with suppliers from 31 countries in 2018. In order to ensure sustainability in procurement and maintain long-term cooperative relationships, 96% of all suppliers come directly from IMMOFINANZ's operating markets. The support for local suppliers and contribution to added value in the operating markets is, therefore, a central concern.

#### **IMMOFINANZ'S SUPPLIERS**

Origin



The following operating markets are defined as "significant locations of operations": Austria, Germany, Czech Republic, Slovakia, Romania, Hungary, Poland and Serbia.

The selection of business partners is based on the **Group Procurement Guideline**, which specifies the rules and procedures for all purchasing activities at IMMOFINANZ. This guideline reflects the principles defined by the Corporate Code and requires the careful and responsible selection of suppliers. A central objective is to minimise the supplier risks arising from child labour, forced labour and compulsory labour and from an insufficient social assessment of suppliers.

In addition to the responsible selection of suppliers, IMMOFINANZ works continuously to intensify the communication with its business partners. The medium-term goal is the implementation of a supplier relationship management tool (SRM), whereby the starting point for this interactive platform will be formed by the newly planned ERP system.

## **RESPECT FOR HUMAN RIGHTS**

The respect for and compliance with human rights, and above all the dignity of the individual, has high priority for IMMOFINANZ. In addition to compliance with national constitutional and legal requirements, IMMOFINANZ places special importance on compliance with the conventions of the International Labour Organization (ILO) for the freedom of assembly, the abolition of forced labour and child labour and discrimination. Violations of human rights – above all forced labour and child labour – are strictly rejected and IMMOFINANZ's business partners are expected to observe these ethical standards.

# FIGHT AGAINST CORRUPTION AND BRIBERY

The **Anti-Corruption Guideline** issued by IMMOFINANZ is based on the UN Convention against Corruption and summarises the principles and rules of conduct for dealing with corruption. Its goals are to ensure legally compliant behaviour by employees, business partners and customers; to prevent conflicts of interest from arising; to sensitise employees for potential conflicts of interest and thereby protect them from criminal offenses; and to prevent damage to IMMOFINANZ's reputation as a result of improper practices. The guideline includes, among others, rules for the acceptance and granting of advantages, donations and sponsoring, the use of intermediaries and the prevention of money laundering.

## **POTENTIAL RISKS**

The acceptance of gifts, corruption, bribery and conflicts of interest carry an inherent risk of damage to the company's reputation as well as the risk of detrimental transactions for the IMMOFINANZ Group. These guidelines are intended to prevent such consequences. There are currently no indications of risks of corruption, and the ongoing measures will ensure added training for and create a greater awareness among employees.

IMMOFINANZ's wide range of business relationships is accompanied by a risk that a company with lower ethical standards could be involved. IMMOFINANZ minimises this risk with the careful and responsible selection of business partners.

## **DATA SECURITY**

IMMOFINANZ started at an early point in time to address the extended requirements for the protection of personal data which are required by the Data Protection Regulation ("Datenschutzgrundverordnung", DSGVO) which took effect in May 2018. This regulation significantly expands the obligations of responsible organisations and the rights of involved parties, but also brings a massive increase in the sanctions for violations of data protection. Consequently, compliance with the applicable data protection rules is a legal requirement and an essential objective for the IMMOFINANZ Group.

The measures and investments required to apply the Data Protection Regulation were defined and implemented by corporate legal affairs und compliance, legal and IT together with all other business areas.

The **Data Protection Guideline** defines binding rules for all employees of the IMMOFINANZ Group and covers the legally compliant processing of personal data and related obligations. All processing activities must be logged in a register. Compliance with this guideline is intended to ensure that the company meets all relevant data protection requirements, in particular protection for the rights of involved parties, the definition of processes for handling these rights, the prevention of data protection violations and the avoidance of fines.

The organisational measures for the protection of data and compliance with data protection rights include mandatory training for employees by the data protection coordinator.

The company is not aware of any justified complaints by third parties or supervisory authorities in connection with violations of the protection of customer data in 2018.

