

Corporate Code

As amended in
2022

IMMOFINANZ

Content

| | |
|---|----------|
| Corporate Code | 3 |
| Compliance with legal requirements | 3 |
| Observance of fundamental rights, respect and integrity..... | 3 |
| Employee development | 4 |
| Relations with employees and employee representatives..... | 4 |
| Conflicts of interest, fight against corruption..... | 4 |
| Acceptance of gifts, granting of benefits | 4 |
| Competition, conduct on the market | 5 |
| Relations with business partners, customers and associations..... | 5 |
| Handling of confidential information | 5 |
| Insider information..... | 5 |
| Lobbying activities | 6 |
| Information technology..... | 6 |
| Financial integrity | 6 |
| Responsibility for the environment..... | 6 |
| Business partners | 7 |
| Relations with the media & shareholders and communication..... | 7 |
| Implementation..... | 7 |
| Whistleblower system | 7 |
| General validity and implementation of the code..... | 8 |

Corporate Code

IMMOFINANZ is committed to responsible management in accordance with the principles of integrity, honesty and transparency. 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, IMMOFINANZ places high demands for responsible and honest conduct on its employees, customers, suppliers, service providers and other contract partners. IMMOFINANZ's Corporate Code creates the foundation for all of the company's business activities and decisions. It is also the basis for the morally, ethically and legally correct behaviour of all Group employees.

Compliance with legal requirements

We comply with all applicable laws and regulations in the countries where we conduct our business activities and also observe 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 \(UNGC\)](#)

Employee development

We work 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.

Relations with employees and employee representatives

IMMOFINANZ views its employees as its most important assets, and their well-being is our top priority. 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.

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.

Conflicts of interest, fight against corruption

We always act in the best interests of IMMOFINANZ and maintain strict separation between corporate and private interests. The goal is to avoid conflicts of interest, meaning situations where personal interests are contrary to or could negatively influence the interests of the company and are not compatible. Employees receive training 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. Our anticorruption measures include precise rules for the acceptance or granting of gifts, donations and sponsoring, the taxation of benefits, the use of brokers and the prevention of money laundering. 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 violations of internal guidelines, legal regulations, codes of conduct or any other form of corruption at any time, under their own name or anonymously.

Acceptance of gifts, granting of benefits

We do not accept any favours like gifts or personal privileges. IMMOFINANZ 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 (<€100) and invitations within the scope of normal business hospitality. 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. Not included here are typical local or national tokens of appreciation. Invitations to events for public officials are only permitted under certain conditions.

Competition, 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 IMMOFINANZ conducts its 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.

Relations with business partners, customers and associations

We always treat our business partners fairly.

IMMOFINANZ 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 IMMOFINANZ 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

We handle information responsibly and only share it with authorised persons.

IMMOFINANZ employees may 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.

Insider information

We do not share any insider information with unauthorised persons. IMMOFINANZ's 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. 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.

Lobbying activities

Our lobbying activities are always conducted responsibly and in accordance with the respective code: IMMOFINANZ 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.

Information technology

We always use information technologies responsibly to protect data on IMMOFINANZ, its employees and all business partners. IMMOFINANZ 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 IMMOFINANZ's data.

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.

Detailed regulations are provided in our Compliance Guideline.

Financial integrity

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, IMMOFINANZ's 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.

Responsibility for the environment

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.

Business partners

We expect our business partners to comply with all relevant legal requirements and branch standards in their interaction with IMMOFINANZ.

Full compliance with human rights is also expected from our business partners and suppliers, and we encourage them to introduce and implement similar responsibility principles – for example, a policy statement in support of human rights.

IMMOFINANZ does not grant any direct or indirect unjustified benefits to its business partners, neither as monetary payments nor in any other form. Furthermore, actions may never create the impression that a business partner is influenced.

Relations with the media & shareholders and communication

We react as quickly as possible to the inquiries and concerns of our shareholders and the media because maintaining good relationships is important for IMMOFINANZ'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.

Implementation

We expect each and every employee to feel personally responsible for compliance with this Corporate Code. IMMOFINANZ is working to provide its employees with the necessary support and advice to ensure its continuous implementation. 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.

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 whistleblower system. This system is available to all IMMOFINANZ employees and can also be used by third parties.

Link: <https://immofinanz.whistleblownetwork.net>

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

The rules of this code apply to all employees of IMMOFINANZ and its subsidiaries. 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. A violation of the Corporate Code can lead to measures under labour law, i.e. also for managers. Every employee is responsible for compliance with these guidelines and is encouraged to report any violations; supervisors are encouraged to monitor compliance with the code.

IMMOFINANZ is 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.

The Executive Board of IMMOFINANZ AG

Legal Note

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

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.

IMMOFINANZ AG
Corporate Code

IMMOFINANZ AG

Wienerbergstrasse 9
1100 Vienna, Austria
T +43 (0)1 880 90

investor@immofinanz.com
www.immofinanz.com

www.immofinanz.com