



ART INVEST
— REAL ESTATE —

CODE OF CONDUCT FOR BUSINESS PARTNERS

ART-INVEST REAL ESTATE





1. INTRODUCTION

Economic success and social responsibility cannot be separated. Responsible and ethical behaviour towards employees, business partners, society and the environment are an integral part of the value system of Art-Invest Real Estate, including its affiliated companies. Compliance with the law and order in our business activities is a matter of course for us. The Code of Conduct for business partners is based on internationally recognised standards for responsible corporate governance. These include the Global Compact of the United Nations (UN) and the labour and social standards of the International Labour Organization (ILO).

Binding minimum requirements are therefore defined for business partners in the business relationship.

We expect our business partners to observe and implement the standards of the Code of Conduct for business partners without exception.

Business partners in the sense of this Code of Conduct are all third parties who work for, with or on behalf of Art-Invest Real Estate.

2. INTEGRITY

2.1. **Our business partners comply with** applicable local, national and international laws.

Only if our business partners comply with all applicable laws and regulations can we ensure a trusting and sustainable business relationship. We expect especially foreign business partners to inform themselves about the currently applicable rules at the place of execution of their contract. If individual countries have stricter regulations than those described in the Code of Conduct for business partners, the stricter regulations apply.

2.2. **Our business partners** reject any form of **corruption and bribery** of both public officials and employees of private companies. We expect our business partners to strictly prohibit any possible form of bribery and corruption within their sphere of influence and to make and / or accept donations (in the sense of a personal benefit), such as in the context of invitations or in connection with advertising measures, donations and sponsoring, only within the legally permissible scope.

2.3. **Our business partners** refrain from and prevent any form of **fraud**, accounting fraud and other behaviour that can lead to a financial loss for Art-Invest Real Estate, the customers of Art-Invest Real Estate or the social security agencies and / or tax offices. Examples of asset-damaging offences include fraud, accounting fraud, social security fraud, bribery offences, undeclared work, theft, misappropriation, tax evasion, money laundering, withholding and embezzlement of pay, etc.

2.4. **Our business partners** comply with applicable **antitrust and competition laws**. In particular, they shall refrain from restrictive agreements with competitors, suppliers, distributors, dealers and customers as well as from other restrictive practices. These include not only price-fixing agreements with competitors, the allocation of customers or sales territories between competitors, anti-competitive boycotts and the direct or indirect exchange of competitively relevant information with other competitors, but also any influence on the market behaviour of other competitors.



- 2.5. **Our business partners** respect and protect **intellectual property** of all kinds.

Confidential information about Art-Invest Real Estate is to be treated strictly confidentially by the business partners. It may not be disclosed by our business partners or their employees to third parties who do not have a right to this information. This also includes all information in textual or graphic form, data, photos, etc., which Art-Invest Real Estate or its affiliated companies have received from their customers or other business partners.

The business partners commit themselves to use the information provided by Art-Invest Real Estate exclusively for the fulfilment of their contractual obligations. They do not use this information for any own or personal purposes of employees that are not permitted by law, or for any other unethical or illegal purpose or activity.

Communicating confidential information in public and in social media or the unauthorised disclosure of information about Art-Invest Real Estate or its business partners to third parties or the media is a significant breach of the confidentiality principles.

Business partners shall demonstrably oblige their employees to protect confidential information, business and trade secrets.

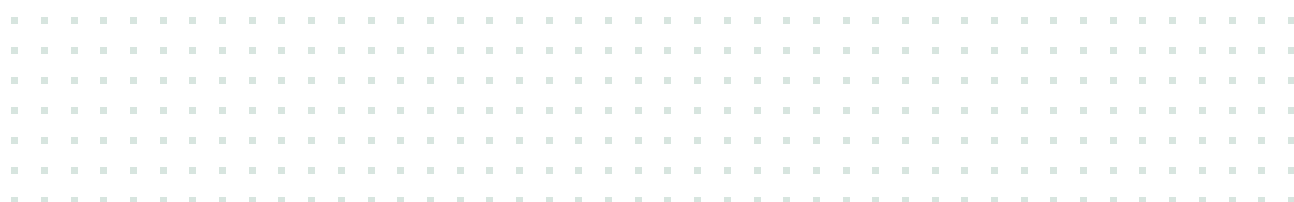
- 2.6. **Our business partners** comply with applicable laws and regulations when processing (e.g. collecting, storing, processing or transmitting) **personal data and information**. They shall also take appropriate measures to protect them from unauthorised access, loss or destruction. Personal data includes among other things name, address, telephone number, date of birth, height, physical characteristics, religion, etc.

3. EMPLOYEES

- 3.1. **Our business partners** respect and support the protection of globally recognised **human rights** and ensure that the principles of the UN Global Compact and the core labour standards of ILO are adhered to in their areas of performance. They comply with the prohibitions on child labour and forced labour without exception.

- 3.2. **Our business partners** adhere to the legal regulations for **fair working conditions** and enable their employees to address issues openly and without fear of reprisals. The business partners comply in particular with the European regulations for securing minimum working conditions, the EU Posted Workers Directive, and for the Federal Republic of Germany, for example, the Mindestlohngesetz [Minimum Wage Legislation], the Arbeitnehmer-Entsendegesetz [Posted Workers Act] and the Arbeitnehmerüberlassungsgesetz [Temporary Employment Act], and actively help to ensure that violations of mandatory labour and social regulations as well as tax laws in their area do not occur. Intimidation and reprisal attempts against employees who report actual or suspected misconduct in good faith will not be tolerated by our business partners. Our business partners also provide their employees with the opportunity to confidentially report potential compliance issues or compliance violations.

- 3.3. **Our business partners** ensure a working environment that is free from **discrimination** on the grounds of ethnic origin, nationality, gender, pregnancy or parenthood, marital status, age, disability, religion or belief, sexual orientation or any other grounds covered by a prohibition on discrimination.





- 3.4. **Our business partners** ensure a **healthy and hazard-free working environment** for their employees by complying with all laws and other rules and regulations on health and safety in the workplace. This includes, in particular, the correct and complete equipping of employees with the necessary protective equipment, the timely preparation of hazard analyses as well as the sufficient and repeated training of employees in all occupational safety matters that affect their workplace. The material and tools provided by our business partners to the employees are safe and comply with the EU regulations or the requirements in the country of the employee's assignment.

4. ENVIRONMENT

- 4.1. **Our business partners** take responsibility for **environmental and climate protection** and minimise negative impacts on the environment, the climate and biodiversity. All activities with potential environmental impacts must be carried out in accordance with the applicable legal and regulatory requirements.
- 4.2. **Our business partners** use **natural resources** responsibly and efficiently (resource efficiency). They prioritise the reuse and recycling of materials, use suitable substitutes and strive to reduce or avoid waste of any kind.
- 4.3. **Our business partners** ensure the **safe handling** of biological, chemical or other hazardous substances through their responsible identification, assessment and management – from storage and use through to disposal and recycling.
- 4.4. **Our business partners** ensure that all necessary **permits, licences and registrations** are in place before the business relationship commences and remain valid throughout the entire term of the contract. In the interests of data transparency, activities relevant to the environment and health must be documented in a complete, accurate and traceable manner. Upon request, they shall provide information on their environmental and climate protection measures, as well as evidence of the resources used.

5. BUSINESS PARTNERS – COMPLIANCE

- 5.1. **Our business partners** ensure the implementation of and **compliance with the Code of Conduct** for business partners. To this end, they also pass on the principles of the Code of Conduct for business partners to their employees and work to ensure that they are followed.
- 5.2. **Our business partners** work towards ensuring that **their own business partners**, who are employed for or on behalf of Art-Invest Real Estate, also contractually accept these minimum requirements of the Code of Conduct for business partners and comply with them during the execution of the contract.
- 5.3. **Our business partners** support us in **clarifying the facts** in the event of a suspected violation of the Code of Conduct for business partners.

Art-Invest Real Estate reserves the right to react appropriately in case of proven violations of its Code of Conduct for business partners, depending on the severity of the violation. The range of possible reactions extends from a request to cease the infringement to extraordinary termination of the contract with the assertion of claims for damages.