

CODE OF ETHICS & CODE OF CONDUCT

Department primarily responsible: CPO

Persons affected: All employees

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CODE OF ETHICS & CODE OF CONDUCT

I. PREAMBLE

As one of the leading real estate investment and project development companies in Central Europe, we are the first choice for investors and shareholders, equity and outside capital providers, buyers, customers, tenants and other interested parties, suppliers, business partners and contractual partners, employees, government representatives and lobbyists, the media and the general public. We are successful in our field, setting standards of quality, transparency and fairness in our business segment.

Our goal is to generate long-term value from real estate and provide long-term benefits to our shareholders, tenants and users while taking care to utilise resources responsibly in all our activities.

In line with this positioning and our self-imposed goal of, CA Immo is committed to the following basic values ("**Code of Ethics**"), which are set out in detail in our **Code of Conduct** and in separate, more detailed guidelines. These basic values are binding for our employees. CA Immo will not tolerate breaches of these basic values. Failure to comply with them may have consequences under labour law.

We also endeavor to oblige our contractual partners to recognize fundamental values before concluding contracts and to comply with legal, ethical and moral principles and to impose these on their business partners and suppliers.

The generic masculine is used in this document for reasons of better readability. Female and other gender identities are explicitly included where this is necessary for the statement.

II. (LEGAL) BASIS

The legal basis for the adoption of this guideline can be found in numerous national and international laws, directives, conventions and regulations. These include, for example, the EU Taxonomy, the EU Whistleblowing Directive and the national implementing legislation based on it, the "Minimum Age Convention - C138" and the "Forced Labour Convention - Co29", the UN Charter and the European Convention on Human Rights, national labour protection laws, national and international anti-corruption laws.

III. RESPONSIBILITIES

Corporate Office & Compliance (CPO) has **primary responsibility** for this guideline.

Secondary responsibility for this guideline lies with the Human Resources (HR) and Corporate Communications (CC) departments.

This guideline is aimed at **all employees** of the CA Immo Group.

Queries regarding the content and interpretation of the guideline should be addressed to the Group Head of Compliance (compliance@caimmo.com).

IV. MISSION STATEMENT

PREAMBLE

As a real estate company, CA Immo understands that integrity, professionalism, transparency and fairness constitute the essential foundation of our dealings with stakeholders. We are mindful of economic, environmental and social aspects as we develop and manage properties, and we regard raising the value of real estate and the company as our duty and our goal.

Our stakeholders include, above all, our investors and shareholders, our equity and outside capital providers, buyers, customers, tenants and other interested parties, our suppliers, business partners and contractual partners, our employees, government representatives and lobbyists, our competitors, the media and the general public.

Given the breadth of such a target group, it is apparent that our business activity is inextricably linked with a responsibility to society.

For CA Immo, integrating corporate governance in everyday business dealings is of fundamental importance. We organize our business in such a way that we are able to comply with all applicable compliance and governance standards. Above all, the CA Immo business model is based on the trust that we have earned from our stakeholders.

As an international real estate company headquartered in Vienna and listed on the Vienna Stock Exchange, it is very important to us that we comply with the relevant legal provisions in Austria; we are committed to observing the most recent version of the Austrian Corporate Governance Code. Compliance with the locally applicable laws and standards is also a matter of course for our subsidiaries in Germany and Eastern Europe.

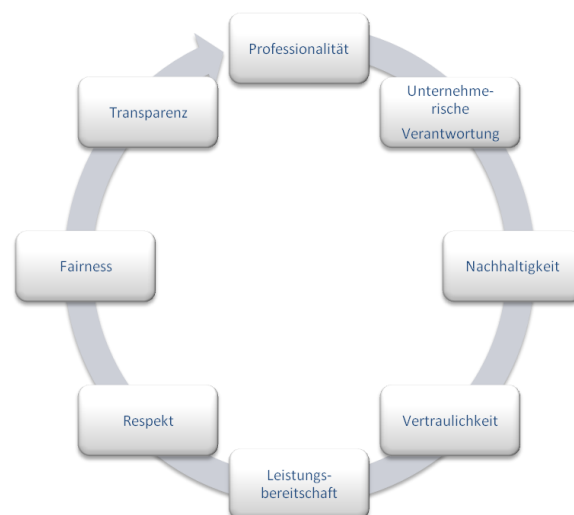
We have set out the basic principles of our actions in a Code of **Conduct**. ("Code of Conduct"). It applies to all business areas, is underpinned by our values and serves the CA Immo Group as a central document for the fulfilment of its strategies and objectives. The code of conduct was drawn up internally at Group level with the involvement of the company management, staff and individual business areas. We regard comments, suggestions and proposals for improvement from both internal and external bodies as motivation to promote the further development of this code of conduct.

MISSION STATEMENT - CORPORATE MISSION STATEMENT

Our aim is to create lasting value with real estate, to generate sustainable benefits for our shareholders, tenants and end users and to use resources consciously and sparingly in all our activities.

We invest in, develop, manage and administer both properties and companies with a balanced consideration of economic, ecological and social aspects.

Our experience, our international network and our long-term strategic perspective form the basis for achieving our goals. Our actions are guided by the following key values determined:



We always behave fairly towards our stakeholders. Conversely, we expect and demand the same from our partners. For us, fairness means integrity, balance, adherence to contracts and respectful and transparent dealings with one another.

We operate in a large number of countries with different languages and cultures. We are successful because we respect these differences and endeavour to make the strengths of each individual region our strength.

The motivation of our employees is determined by the demand for high flexibility and self-motivation, innovative strength and the quality standards we set for our work.

We see real estate as a long-term investment and make decisions in the knowledge of the responsibility that goes with it. Sustainability therefore has two important aspects for us: Firstly, we want to create a lasting relationship with our investors, partners and employees, and secondly, our properties are designed to be sustainable.

Our daily actions are characterized by professionalism. We not only set high standards for the professional quality of our employees and their performance, but also pay particular attention to the proper handling of all issues and resources relevant to the company. Even in critical situations, we rely on reliability, decency, fairness, loyalty and integrity.

Maximum transparency with regard to the valuation and utilization of properties, for example, as well as in all aspects of transaction and allocation processes, is the basis for the traceability of corporate value. Measures that promote trust and the strengthening and continuous improvement of transparency are therefore essential for CA Immo in order to strengthen the confidence of all stakeholders.

Confidential handling of sensitive data is a matter of course for us; conversely, we expect the same from our partners.

We are aware of our entrepreneurial responsibility and in our day-to-day activities we ensure an appropriate risk appetite, weighing up risk and return.

OUR CORPORATE OBJECTIVE

The main objective of our portfolio strategy – and thus the key criterion on which each new investment decision

is based – is the generation of long-term revenue and attractive returns; in this way, we can remain an acknowledged and accepted partner to our stakeholders. Through real estate, we aim to create lasting substance of long-term benefit to shareholders and customers alike. Our day-to-day business activity revolves around the needs of people and the sparing use of resources as well as raising of value of our real estate.

OUR STRATEGY

CA Immo pursues its objective by firmly positioning itself as an investor in commercial real estate, focusing on the region of Central Europe through the business areas of investment properties and project development. In doing so, the company can draw on over 30 years' experience, the local presence of qualified employees and a wealth of project development expertise.

Regardless of region or asset class, however, our central aims are to secure the earning power of investment properties whilst realizing development projects efficiently. This gives rise to the following strategic priorities in particular:

- Maintaining and improving long-term profitability and dividend payouts.
- Achieving an adequate return on equity (RoE) and an attractive total shareholder return (TSR).
- Optimizing the portfolio and quality standards, thereby focusing on defined core regions and usage types
- Implementing a balanced business mix (balancing the asset portfolio against development activity)
- Pursuing a comprehensive set of environmental, economic and social sustainability goals
- Establishing a robust balance sheet and financing structure
- Creating a coherent CA Immo corporate culture.

OUR SOCIAL RESPONSIBILITY

We meet our responsibility to society by taking economic, environmental and social factors into account in our real estate management and project development activities.

CA Immo invests in and develops properties that have the potential to make a long-term contribution to urban

planning. The modern city district is far from monocultural; it thrives on an intelligent blend of usages as well as a cross-section of generations and cultural and social facilities. We are heavily involved in the design and layout of public spaces, taking account of contemporary requirements with regard to quality (and quality of life), energy efficiency, conservation and architecture as well as the need to minimize construction costs. We are aware of the relevance to urban planning of our development projects and city district development activities, which are often long term in nature. We accept our associated social responsibilities by acting with transparency and are prepared to enter into discussions and exchanges with relevant stakeholders. The city district of today serves all the needs of modern urban living: it offers cultural and social diversity by skillfully blending usage types and bringing together different generations, and it engages the senses with wide-ranging cultural facilities and services. Green spaces and water features are also incorporated. CA Immo utilizes resources responsibly in its construction activities, creating high-quality properties for the future that consume as little energy and water as possible. This secures the value of our real estate over the long term.

When acquiring existing properties, CA Immo also pays attention to meeting contemporary demands for (living) quality, energy efficiency, environmental protection and architecture, as well as optimized construction and management costs.

OUR CONDUCT TOWARDS STAKEHOLDERS

Our business policy – and thus the way we conduct ourselves towards our various stakeholders – is characterized by fairness, honesty and reliability. We treat our stakeholders with respect as colleagues; in turn, we expect our business and contractual partners to deal with us in a fair and respectful manner. We observe intellectual property and always ensure our marketing and advertising practice is fair and free from discrimination and misleading information of any kind.

OUR CONDUCT TOWARDS OUR EMPLOYEES

CA Immo is successful in many countries with different languages and cultures. This is because we respect and appreciate these differences, turning individual strengths to our own advantage. We strive to attract the highest calibre employees to our company and establish

long-term working relationships between the company and its staff. We have high standards and set our employees ambitious targets. This presupposes high qualification levels on the part of our staff. We support and encourage our employees by means of continual professional training opportunities according to need. We respect the rights, interests and needs of our employees and take account of their individuality to ensure proper equality of opportunity. Within the company, we use courteous terms of address and are fully and actively committed to achieving the goals of the company as well as personal targets. We are constantly aiming to improve communication within our organization. CA Immo has published separate Corporate and Social Responsibility guidelines which commit the company to deal with employees in a fair and respectful manner. At the same time, we ask our employees to commit to fair and respectful dealings with each other and with external persons (applicants, service providers, contractual partners and others).

V. DECLARATION OF FUNDAMENTAL VALUES

A. COMPLIANCE WITH LAWS AND ADHERENCE TO THE LAW

, CA Immo and its employees conduct their activities within the framework of applicable law. CA Immo categorically rejects wilful violations of the law, these basic values, our code of conduct and other internal guidelines and processes.

B. SAFEGUARDING THE INTEGRITY OF ACTIONS

In our actions and decisions, we always ensure that they are taken on the basis of appropriate, objective and economic considerations and free from any appearance of a conflict of interest. CA Immo does not tolerate corrupt business practices such as corruption, bribery, the improper acceptance or granting of gifts, political influence peddling or cartel agreements by employees or external service providers and contractual partners. Even the appearance of corrupt business practices must be avoided.

Further details can be found in the internal Anti-Corruption guideline.

C. RESPECT FOR HUMAN RIGHTS

Human rights are to be regarded as fundamental values. CA Immo is therefore committed to complying with the human rights defined internationally in the **UN Charter** and the **European Convention on Human Rights** within its own sphere of influence and to upholding ethical standards in its actions at all times. We categorically reject any violation of these human rights - whether in our company, with our business partners or along the entire supply and value chain. This also includes any form of forced and/or child labour (as defined in the "Minimum Age Convention - C138" and the "Forced Labour Convention - Co29") and discrimination based on gender, sexual orientation, marital status, regional or social origin, race, skin colour, religion, ideology, age, membership of an ethnic minority, disability of any kind or for any other reason.

D. COMPLIANCE WITH ENVIRONMENTAL STANDARDS

CA Immo regards the applicable environmental laws as minimum standards. We consider a proactive, long-term environmental strategy that looks ahead to, the ongoing evaluation and improvement of the impact of our own performance on the environment and the increase in environmental and energy efficiency, as well as the evaluation of the impact of the environment on our business activities, to be a cornerstone of our actions, as is ensuring a long-term material cycle (recycling).

We fully support the **United Nations climate goals** and the associated transition to a low-carbon and sustainable economy and share responsibility for the carbon emissions associated with the properties developed and held by CA Immo.

E. COMMITMENT TO SOCIAL RESPONSIBILITY AND COMPLIANCE WITH LABOUR RIGHTS

The observance and maintenance of social standards towards our employees as well as towards our external business partners and users of the properties we develop and manage is of the utmost importance to us.

This includes compliance with social standards and employee protection, as well as safeguarding the rights of employees to organise themselves (rights of assembly, organisation and strike action) both within the CA Immo Group and through business partners. CA Immo employees are free to exercise their employee and assembly rights and to join external employee organisations (trade unions) within the framework of the applicable laws.

In the context of employee protection, CA Immo ensures compliance with internationally recognized maximum working hours. Another key aspect is the creation of further development opportunities for employees and the promotion of talent.

F. TRANSPARENCY AND SAFEGUARDING THE INTEGRITY OF CAPITAL MARKET COMMUNICATION

Accounting, bookkeeping, financial reporting and capital market communication are essential components of communication with shareholders, business partners and the public. CA Immo is therefore committed to exercising the greatest possible care and diligence to ensuring a transparent, fair and equal flow of information.

G. ENSURING A COMPLAINTS PROCEDURE THAT IS ACCESSIBLE TO EVERYONE

The extent to which a company is authentic can be seen from the degree of consistency between the values it postulates and the values it lives by. To ensure compliance with laws, self-imposed obligations and internal guidelines, CA Immo offers its employees and external persons the opportunity to lodge complaints. An electronic whistleblowing system that complies with the relevant national transposition laws of the EU Whistleblowing Directive for CA Immo is available to our employees and external persons (e.g. contractual partners) on our website at whistleblowing system (caimmo.com).

Our employees need not fear any sanctions for reporting incidents in good faith. Attempts at intimidation and reprisals against employees who report actual or suspected misconduct will not be tolerated. Every report is examined impartially by the Corporate Office & Compliance department responsible for compliance and, in the event of a potential conflict of interest in the matter, by the Internal Audit department.

H. OBLIGATION

Every CA Immo employee undertakes to comply with the standards of behaviour set out in our Code of Ethics &

Conduct and the guidelines based on it. Violations of these regulations or other compliance violations will be penalized under labour law. This also applies to violations of the provisions of the Stock Exchange Act (BörseG), insider trading law and other capital market regulations.

In addition, our contractual partners must sign our Business Partner Code of Conduct in accordance with point VII. C., in which they undertake to comply with ethical, legal and moral values and standards of business conduct which also includes the obligation to transfer those obligations along their respective supply chains.

VI. CODE OF CONDUCT

Our behaviour is shaped by our core values and these basic principles are binding rules for dealing with the legal, economic and moral challenges of day-to-day business. The behaviours listed in this Code of Conduct aim to ensure compliance with our core values and to continuously promote the transparency of our business conduct. The required behaviour is also specified in further guidelines.

A) OBSERVANCE OF LAWS AND LAWFUL CONDUCT

Needless to say, CA Immo and its employees act within the framework of applicable law when carrying out their activities. CA Immo categorically rejects wilful breaches of the law, our core values, this document and other internal guidelines and processes. All departments must therefore ensure ongoing compliance in their area of activity and are obliged to liaise regularly with internal specialist departments or external consultants.

B) PROHIBITION OF CORRUPTION AND BRIBERY (ZERO TOLERANCE)

Corruption is often not even recognized as such in its early stages. It is an insidious process. Ultimately, however, any form of corruption jeopardizes the success of our company.

CA Immo is internally and externally opposed to all forms of corruption and bribery.

CA Immo has defined the following binding guidelines:

We do not make any payments or grant any other pecuniary benefits and do not accept any payments in order to obtain business advantages contrary to legal or competition regulations. This applies to business partners as well as to authorities and their employees.

Gifts of money or unauthorized payments to business partners, authorities and political institutions are strictly prohibited and will be regarded as (attempted) bribery.

Furthermore, employees may not accept or offer any gifts that are inappropriate in terms of social behavior or value. It is strictly forbidden to offer, promise, hold out the prospect of or grant money or benefits in kind of any kind to public officials.

Actions and decisions on behalf of CA Immo must always be taken free of any appearance of a conflict of interest and in accordance with appropriate, objective and economic criteria. Corrupt business practices by employees or external service providers are not tolerated. Even the appearance of corrupt business practices must be avoided. We actively ensure that suspicions do not arise in the first place by

- make our award decisions transparent and document them in such a way that they are self-explanatory and comprehensible,
- apply the dual control principle when awarding contracts and authorizing payments and when carrying out transfers,
- strengthen our internal audit function and carry out regular plausibility checks,
- Actively explain processes that could be misunderstood to our customers, enquirers, employees and service providers (transparent organization of business processes).

The behaviour required in this regard as well as prohibited conduct and internal processes are specified in our Procurement Guideline and our Anti-Corruption Guideline.

C) ENVIRONMENTAL PROTECTION

We consider a proactive, long-term environmental strategy that looks ahead, the ongoing evaluation and improvement of the impact of our own performance on the environment and vice versa and the increase in environmental and energy efficiency to be an essential cornerstone of our actions, as is ensuring a long-term material cycle (recycling). We unreservedly support the **United Nations' climate targets** and the associated transition to a low-carbon and sustainable economy, and share responsibility for the carbon emissions associated with the properties developed and held by CA Immo. CA Immo is committed to minimizing the impact of its activities on the environment.

D) PROHIBITION OF DISCRIMINATION AND HARASSMENT

CA Immo is opposed to any form of discrimination based on gender, sexual orientation, marital status, regional or social origin, race, skin color, religion, ideology, age,

membership of an ethnic minority, disability of any kind or for any other reason.

CA Immo supports the right of all people to seek, apply for and perform employment free from discrimination and/or harassment of any kind. Any harassment and discrimination, for whatever reason, of or by employees (including temporary and atypical employees and functionaries), applicants, employees of external companies, customers, service providers and any other person-is therefore expressly prohibited.

Every employee is obliged to respect the personal sphere of every other person. Sexual or other harassment is prohibited without exception.

All employees also have the right to fair, polite and respectful treatment by superiors and colleagues (**prohibition of bullying**).

Building on this, CA Immo has issued a Corporate & Social Responsibility Guideline, which sets out in detail both the company's behavior towards employees and applicants and the conduct of employees towards each other.

E) PROHIBITION OF ANTITRUST AGREEMENTS

CA Immo is opposed to the accumulation and abuse of market power and the coordination and limitation of competitive behavior, and respects the legal norms aimed at maintaining functioning, unhindered competition that is as diverse as possible. We do not tolerate agreements and behavior that restrict competition.

F) GIFTS, DONATIONS AND INVITATIONS

CA Immo pays attention to compliance with the applicable local legal provisions on the prohibited acceptance of gifts and bribery and endeavors to help its employees to clearly recognize the boundary between appropriate gifts and attempts at bribery.

CA Immo has therefore issued a Guideline on Gift and Donations that sets out the limits and framework conditions for accepting and giving gifts and donations.

G) CONTRIBUTIONS TO POLITICAL PARTIES, POLITICAL EXPONENTS AND RELIGIOUS COMMUNITIES

Contributions to political parties political exponents and religious communities (donations, benefits in kind, etc.) are generally prohibited throughout the Group. Details are set out in the Anti-Corruption Guideline.

Nevertheless, CA Immo may meet political decision-makers as part of an exchange of information and discuss complex issues and content relating to the real estate industry with them. CA Immo will always do so in accordance with the basic values set out in this guideline and avoid any form of lobbying, even if this does not constitute unethical behavior per se. An exchange of information between political decision-makers and citizens and companies is an aspect of the public political decision-making process in democracies. Details in this regard are contained in our Anti-Corruption Policy.

H) CONTRACT AWARDS

Our values and our desire to assume corporate responsibility were decisive for the regulations of the procurement guidelines. The current version of the procurement guidelines is binding for all employees involved in awarding contracts.

I) PROTECTION OF THE COMPANY'S ASSETS, PROTECTION OF BUSINESS PARTNERS' ASSETS, SECONDARY EMPLOYMENT, CONFIDENTIALITY

The obligation of employees to protect the company's assets encompasses the resource-conserving handling of work materials as well as proprietary information such as trade secrets, trademarks and copyrights, business and marketing strategies, ideas, designs, plans, databases, business documents, financial data and reports, and personal data. With regard to the handling of insider information and the establishment of confidentiality areas, reference is made to the **capital market compliance guideline, which** has been brought to the attention of all employees and is binding for all employees of the CA Immo Group and which regulates the handling of insider information, the establishment of a compliance organization and the associated processes.

The object- and data-specific protection and security precautions fulfil high standards. In particular, we ensure the physical security of our hardware components, taking into account the data availability and operability of our systems.

All relevant laws and regulations are observed, which is also reflected in the daily work processes.

Protecting the assets of our business partners is just as important to us as protecting our own assets.

.. All data, facts and documents of which an employee becomes aware in the course of his or her work must be treated confidentially.

J) SOCIAL BEHAVIOUR IN THE COMPANY

Our behavior is characterized by mutual respect and a high level of commitment. Our communication is open and our work is characterized by a strong team spirit. We work in a professional and service-orientated manner and are helpful within the scope of the tasks to be fulfilled. Our working style is forward-looking and we consider the impact of our actions on the tasks of our colleagues. We therefore attach great importance to the transparency and documentation of our work results. This social and working behavior puts our core values of professionalism, fairness, transparency, commitment and acceptance of corporate responsibility into practice.

K) BUSINESS ETHICS AND CLIENT ACCEPTANCE

Everyone has the right to be protected from discrimination and harassment of any kind, both internally and externally. Every employee is expected to treat others in a friendly, professional, fair and respectful manner, both internally and externally. Reliable and sustainable partnerships are our goal and our best reference. The customer is at the centre of everything we do, their satisfaction is our goal. We therefore place trust in our business partners, but also expect the same from our counterparts. We treat bidders equally, keep our promises and are confidential. We do not tolerate unreliability, incompetence, fraud, corruption, money laundering or bribery. We endeavor not to enter into business activities with over-indebted or insolvent business partners by means of forward-looking credit assessment procedures.

L) FINANCIAL REPORTING

Compliance with statutory and regulatory requirements for external accounting and financial reporting in the narrower sense is one of the binding principles of the CA Immo Group. All employees are required to contribute to this with the greatest possible care and diligence. In addition to the proper execution of accounting tasks, employees in all departments are also obliged to provide the necessary information and supporting documents correctly and completely. It goes without saying that, in particular, wilful actions that result in false statements in the accounts are prohibited. Specifically, the following are prohibited:

- Deceptions in the form of deliberately false statements and
- the deliberate omission of information.

This is an expression of the principle of fairness towards our investors as well as our customers and contractors. Integrity and transparency enable our partners to gain an accurate picture of the economic performance of our company.

M) PAYMENT TRANSACTIONS

The prevention of prohibited activities such as money laundering, corruption and bribery is one of our company's binding principles. As such activities regularly involve the use of cash, CA Immo does not undertake or accept any significant business transactions involving the use of cash. Transactions are deemed to be material if they are not merely the usual organizational processes of everyday life (e.g. cash payment of taxi fares, local public transport tickets, , fees, etc.).

If a customer expressly insists on a cash payment as part of the provision of rental collateral, the acceptance of cash is permitted in these cases, provided that the recipient of the cash payment deposits the amount immediately into a bank account of the company. Receipt of the cash must be acknowledged and the payment into the bank account documented accordingly. The documents must then be sent immediately to the accounting department to ensure that the account is reconciled promptly. The acceptance of cash is prohibited in all other cases. In this respect, all significant business transactions must be processed within the usual framework of invoicing and

subsequent cashless, account-based payment transactions. This is also an expression of the principle of fairness while maintaining integrity and transparency.

N) DEALING WITH CONFLICTS OF INTEREST

If personal interests and the interests of the CA Immo Group are in conflict, this is a typical case of a conflict of interest that does not rule out the possibility of acting improperly in such a situation.

In order to avoid conflicts of interest, employees are obliged to disclose memberships of governing bodies and shareholder positions at other entities to the Corporate Office & Compliance department.

In the event of a conflict of interest, the employee concerned must notify the Corporate Office & Compliance department immediately. A conflict of interest exists, for example, if a person close to the employee is directly or indirectly involved in a company with which CA Immo is to enter into a business relationship or holds a position on a governing body. If the employee is undecided as to whether a specific conflict of interest is undecided, the employee must assume that such a conflict exists. For this reason, even a mere potential conflict of interest must be disclosed and discussed with the Corporate Office & Compliance department, which must then authorize or prohibit the continuation of the business or private activity. Members of the Management Board of CA Immo who are affected by a conflict of interest must inform their colleagues on the Management Board and the Supervisory Board of this matter in addition to the Corporate Office & Compliance department.

In the interests of corporate responsibility and mutual fairness, sideline activities and holdings in companies that compete with CA Immo and shareholdings in companies that compete with CA Immo or are otherwise closely related (e.g. business partners, related parties) must be disclosed and authorized in writing by the Management Board. In addition, sideline activities of the Management Board - in particular Supervisory Board mandates in companies outside the Group - require the approval of the Supervisory Board. External mandates of executive employees are subject to the approval of the Executive Board.

Members of the Supervisory Board may not hold positions on the boards of other companies that compete with the company, otherwise a reasoned declaration

must be submitted in accordance with the "comply or explain" principle (see, among other things, C Rule No. 45 of the Austrian Code of Corporate Governance).

In fulfilling their functions as members of governing bodies of companies with close links to competition or similar sectors, the management and supervisory bodies and employees of CA Immo are obliged to abstain from voting in the event of conflicting interests, whereby a strict standard must be applied when assessing the existence of a conflict of interest. All third-party mandates held by members of the Supervisory Board and Management Board or senior executives must be disclosed in accordance with the principle of transparency.

These measures are intended to help avoid situations that could lead to a conflict between the personal interests of the individual and the interests of the company.

P) TAX POLICY

CA Immo is committed to strict compliance with all applicable tax laws and regulations in all countries in which we operate. We recognize that compliance with tax laws is crucial to maintaining the trust of our stakeholders and making a positive contribution to society.

CA Immo avoids aggressive tax practices and will communicate clearly and transparently on all tax matters and co-operate with tax authorities. CA Immo takes enquiries from the tax authorities seriously and is committed to a cooperative and transparent exchange.

Q) THE PRINCIPLES OF FAIR AND PROPER BUSINESS MANAGEMENT IN THE REAL ESTATE SECTOR ("THE 10 COMMANDMENTS")

Based on the 10 commandments of the Austrian Sustainable Building Council (ÖGNI), the following principles apply to CA Immo, its subsidiaries and the companies commissioned to provide services (e.g. in the area of asset management):

- For CA Immo, **professionalism, transparency and fairness** towards our stakeholders form the indispensable basis of our business activities.
- We conduct our business **in the interests of investors and/or clients** and are committed to the goal of increasing the value of companies and properties.

- The **management of CA Immo** has the necessary aptitude and sufficient experience and ensures the ongoing training of managers, junior managers and specialists.
- Expert **supervisory and advisory bodies** increase the quality of decision-making in real estate transactions. Our committees are appropriately staffed and informed by the company management in a forward-looking, clear and comprehensive manner.
- The proper **valuation of our real estate assets is carried out using** recognized valuation methods by qualified experts on the basis of current and objective market information. The valuation method and its changes as well as the market values of the real estate portfolio are explained in detail.
- The real estate business usually involves high capital expenditure and a long-term planning horizon. The establishment and ongoing development of an internal **control system and a risk and risk management are therefore** essential for CA Immo.
- **Conflicts of interest** between employees, members of management, supervisory and advisory bodies on the one hand and CA Immo on the other, or between CA Immo and investors, are avoided or disclosed by means of appropriate rules.
- The **audit of the annual financial statements is of** great importance for the protection of investors and for building trust. When selecting auditors, the criteria of independence and qualification are strictly observed.
- CA Immo's **business model, organizational structure and shareholdings** are continuously adapted to market requirements and clearly presented and any changes explained.
- The **information policy** is characterised by the principles of credibility and equal treatment. We inform institutional and private, domestic and foreign investors and other market participants objectively, clearly, comprehensively and simultaneously in a form and language appropriate to the target group and in suitable media.

R) WHISTLEBLOWING SYSTEM AND WHISTLEBLOWER PROTECTION

1) General information

Whistleblowing means reporting information about possible violations of laws, internal guidelines or ethical standards that have been observed in the course of CA Immo's business activities.

CA Immo implements a whistleblowing system to provide employees and other involved parties (such as contractual partners) with an effective mechanism to report concerns about illegal behaviour, ethical breaches or other observed misconduct.

This whistleblowing system is used to report any kind of possible misconduct and violations within CA Immo, including but not limited to

- Violations of the basic values set out in this guideline and the Code of Conduct
- Fraud
- Corruption or bribery
- Discrimination or harassment of employees
- Violation of other specific company guidelines, the process framework or work instructions
- As well as, in general, the violation of laws or regulations relevant to CA Immo, in particular those in § 2 HinSchG or § 3 para. to 5 HSchG.

Employees and third parties are required to report violations. Violations will be punished under labour law and, if deemed necessary, external institutions such as law enforcement authorities will be notified.

Reports must always be submitted to the internal reporting office.

2) Internal Reporting Office - Organisation

The Corporate Office & Compliance department is tasked with setting up and operating an **internal reporting office** at the parent company CA Immobilien Anlagen AG in accordance with the relevant national laws. Corporate Office & Compliance is obliged to organize this internal reporting office in a secure, confidential and data protection-compliant manner.

It must also be ensured that the Corporate Office & Compliance department always has sufficient material and human resources (with sufficient expertise) available to follow up on reports effectively and within the required deadlines.

This reporting office serves as a joint reporting office for all CA Immo Group companies, in particular within the meaning of Section 14 (2) HinSchG.

An independent organization must be set up and a competent person appointed for the Group companies in the Czech Republic in accordance with national Czech whistleblower and anti-money laundering legislation. The relevant organization and required conduct will be made available to the employees working in the Czech Republic separately in writing in the form of a contractual instruction and must be confirmed separately by them.

3) Procedures regarding notifications received, deadlines and documentation

In the event of suspicious circumstances, affected employees and also third parties have the option of informing their immediate line manager or, if applicable, the higher-level manager and the Corporate Office & Compliance department responsible for compliance about these incidents. Such reports can be made verbally (by telephone or in a personal meeting), in writing (e.g. by letter or email) or via the electronic whistleblowing system. If a report has only been made to the manager, the manager is obliged to forward the information immediately to the internal reporting office.

The option of reporting breaches anonymously via the electronic whistleblowing system set up by CA Immo is available to everyone, i.e. to our employees as well as external persons (e.g. contractual partners). Information and access to the electronic whistleblower system is provided on our website at Whistleblower system (caimmo.com). In addition to English, the tool is also available in every national language in which CA Immo has branches or subsidiaries.

To ensure the protection of whistleblowers, all reports received are treated with the utmost confidentiality. Every report is investigated impartially by the Corporate Office & Compliance department responsible for compliance and, in the event of a potential conflict of interest, by the Internal Audit department.

Reports are processed by the Group Head of Compliance and the facts described are reviewed. If reports are not submitted in person (e.g. in the event of conflicts of interest (e.g. if someone from the Corporate Office & Compliance department is affected), reports are processed by the Internal Audit department and by the Management Board or external advisors.

In the course of the audit, external consultants and/or employees who are competent for the individual case may be (partially) informed about the report, to whom the confidentiality obligations must be transferred.

The whistleblower must confirm receipt of the notification within 7 days. Within 3 months of receipt of the report, the whistleblower must be provided with feedback regarding any follow-up measures planned or already taken and the reasons for these. Feedback may only be provided to the whistleblower to the extent that this does not affect internal enquiries or investigations and the rights of the persons who are the subject of a report or who are named in the report are not impaired. In those cases, in which feedback to the whistleblower cannot be provided within the aforementioned period due to the complexity of the case, the processing period may be extended by a further 2 months, whereby the whistleblower must be informed accordingly.

The notifications received and the material collected in the course of the audit procedure must be retained for at least three years after the conclusion of the procedure, unless longer retention periods exist in individual cases in accordance with statutory requirements. The documents must then be deleted.

4) Whistleblower protection

Attempts at intimidation and reprisals against employees who report actual or suspected misconduct will not be tolerated. CA Immo also expressly prohibits any sanctions or retaliatory measures against bona fide whistleblowers.

A whistleblower is acting bona fide if he

- at the time of the notice
- on the basis of the actual circumstances
- and the information available to him
- had reasonable grounds to assume,
- that the information he has provided is true.

Bona fide whistleblowers (including those known by name) are given the best possible protection by Corporate Office & Compliance. Care is also taken in the chain of command to ensure that there is protection against any kind of discrimination. Confidential processing and the preservation of anonymity vis-à-vis the rest of the company must also be guaranteed at all times.

All retaliatory measures against bona fide whistleblowers, such as

- Suspension, termination or comparable measures
- Non-renewal or premature termination of a fixed-term employment contract
- Downgrading or denial of promotion
- Relocation of duties, change of place of work, reduction in pay, change in working hours.
- Refusal to participate in further training measures
- Negative performance appraisal or issue of a poor reference
- Disciplinary measure, reprimand or other sanction, including financial sanctions

are strictly prohibited.

On the other hand, misuse of the submission of information is punishable under labour law.

5) External reporting centres

Member states have set up their own external reporting centres in accordance with the respective national transposition laws. An external reporting office is an authority to which violations of the legal matters covered by the Whistleblowing Directive can be reported in writing or verbally. This scope of application is less extensive than that of the internal reporting office, as the internal reporting office is also available, for example, to report breaches of purely internal company guidelines.

However, the national transposition laws provide that persons should be favoured to report to an internal reporting office in cases where effective action can be taken against the infringement, and they do not have to fear reprisals.

In accordance with the intention of the legislator, we would therefore like to point out that reports should only be made to external reporting centres if deadlines have expired in the internally established reporting centre or if a remedy cannot be expected based on the feedback.

VII COMMITMENT - COMPLIANCE MANAGEMENT

The following sections define how we intend to make the statements on our core values and our Code of Conduct binding for all employees and for our business partners.

A) Compliance declaration

The members of the Management Board and all employees of CA Immo undertake to ensure the legal conformity of their business activities and to comply with the values, guidelines and standards of behaviour of CA Immo. To this end, all employees are required to sign a corresponding "**Guidelines Declaration**", which forms part of their employment contracts, unless an equivalent regional declaration has been signed at subsidiaries. This document is published in German and English. If necessary, CA Immo will make this document available to employees in their local language.

B) Compliance training

The members of the Management Board and all CA Immo employees undertake to complete the (annual) compliance training courses offered, which cover all aspects of our Code of Ethics & Conducts (in particular anti-corruption, competition and antitrust law, awarding of contracts, capital market compliance and requirements for financial reporting, handling gifts and donations and conflicts of interest, whistleblowing and whistleblower protection etc.). Additional ad hoc training courses are also offered for relevant business departments in the event of legal changes or changes to the defined processes. These training courses are offered both as online training and as classroom training.

This is supplemented by training sessions on social behaviour and the environmental standards of the CA Immo Group.

C) Third-party compliance - Business Partner Code of Conduct

CA Immo attaches great importance to ensuring that its business partners act in accordance with the law and the ethical standards of CA Immo. Depending on the size (including financial) and therefore also the risk of the business project, we involve our business partners in preventive measures ("third-party compliance") and/or carry out third-party due diligence that covers all aspects relevant to the business project in question. This also includes a review of anti-corruption measures, employee protection regulations and compliance with human

rights and environmental standards by business partners. Depending on the results of this review or the dialogue with our business partners, the necessary securities are adjusted, increased internal approvals are required or business partners are rejected.

Employees who commission third parties to carry out activities for CA Immo must ensure that these parties are made aware of our basic values (Code of Ethics) and the associated standards of behaviour (Code of Conduct) and that these parties either comply with our codes or have implemented standards of their own which are equivalent to our standards in terms of content. A KYC check and a credit check must also be carried out as part of the commissioning process if this is required by the relevant guidelines.

When entering business relationships, we endeavor on signing the "**Business Partner Code of Conduct**" before concluding a contract, which is to become an integral part of the contract. This is valid for all further contractual arrangements with the respective business partner. Signing the Business Partner Code of Conduct is especially relevant for those contracts who are subject to approval at least from the full Group Management Board and for those contracts where a high-risk profile of the business partner with regard to compliance risks has been identified (e.g. domicile in a high-risk country or involvement of PePs).

The Business Partner shall be obliged to comply with the Business Partner Code of Conduct by using the following clause in the main contract:

"The [Business Partner] has been made aware of the Code of Conduct for Business Partners of the CA Immo, as published at <https://www.caimmo.com/en/investor-relations/corporate-governance/our-values/> and attached as annex [...]*. He acknowledges these standards of conduct and undertakes to comply with them."*

* to be customized to the respective contractual partner and contract

The audits performed are regularly updated and repeated for high-risk business partners with whom ongoing business relationships exist. This also applies to the necessity and appropriateness of the business relationship itself. If situations are identified in dealings with business partners that deviate significantly from CA

Immo standards, the Management Board is informed accordingly. If necessary, and following an individual review of each case, suitable measures are taken to ensure compliance with our Business Partner Code of Conduct.

Corresponding checks are also part of due diligence checks in acquisition and project development processes. If necessary, we include additional compliance clauses and guarantees in contracts. Any further intensification of business relationships with business partners who do not live up to the standards described here only takes place if there are particularly valid reasons and requires the express authorisation of the Executive Board.

D) Supplementary Guidelines

Building on the basic values, objectives and standards defined in this document, CA Immo has issued the following additional guidelines (which are also published on the homepage) on individual topics that regulate the day-to-day business activities of CA Immo employees and business partners. Examples include

- Procurement Guideline
- Anti-Corruption Guideline

- Anti-Money Laundering Guideline
- Corporate Social Responsibility Policy

VIII. POSSIBILITY OF COMPLAINT

Violations of this guideline will be punished under labour law. Employees are encouraged to report violations of applicable law or our codes of conduct. In the event of suspicious circumstances, affected employees and observers have the option of informing their immediate superior or, if necessary, the higher-level manager and the Corporate Office & Compliance department responsible for compliance about these incidents. It is also possible to report such incidents anonymously via the electronic whistleblower system set up by CA Immo. The electronic whistleblower system is available to our employees as well as external third parties (e.g. contractual partners) on our website at Whistleblower system (caimmo.com). Further details on whistleblower protection can be found in section VI.R. of this guideline.