

NON-DISCRIMINATION POLICY

For the protection against disadvantages in accordance with the German General Act on Equal Treatment (Allgemeines Gleichbehandlungsgesetz (AGG)) as amended on April 3, 2013, as well as in accordance with the Directives of the Council of the European Union No. 2000/43/EC of June 29, 2000, and No. 2000/78/EC of November 27, 2000.

Gateway Real Estate AG seeks to benefit from the positive diversity of different opinions, ideas, approaches and solutions within the Company and therefore promotes different cultures among employees. Hence, the Company seeks to prevent any form of discrimination that could limit the positive effects of such diversity. A culture characterized by appreciative interaction and respectful behavior is an essential basis for reaching this goal.

SECTION 1: OBJECTIVE

The objective of this policy is to prevent any form of discrimination at Gateway Real Estate AG. People might be discriminated against based on any ground such as color, ethnic or social origin, language, age, gender, sexual orientation, religion, political opinion or beliefs, disability, or chronic conditions. Gateway Real Estate AG attaches great importance to fairness, equal treatment, appreciative communication, and cooperative behavior of all employees in the workplace.

The objective of this policy is to make all employees aware of any form of unjustified unequal treatment, to take corresponding preventive measures and to support all employees at Gateway Real Estate AG in the event of assaults or to help third parties in the event of assaults conducted by employees of Gateway Real Estate AG.

SECTION 2: SCOPE OF APPLICATION

This policy applies to all employees of Gateway Real Estate AG, both internally and externally in their relations with third parties. The policy applies to any form of harassment, discrimination and violence, stalking or bullying or similar acts.

SECTION 3: DISCRIMINATION

In principle, the definitions of the German General Act on Equal Treatment (Allgemeines Gleichbehandlungsgesetz (AGG)), including the case law based on this act, apply for the purposes of this policy. Accordingly, discrimination is defined as putting one person at a disadvantage to another in a comparable situation because of the reasons set out in Section 1. The same applies for cases of violation of human dignity, hostility, intimidation, humiliation, or insult. There is no discrimination in case that unequal treatment is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary.

Discrimination can manifest itself in particular in the form of unfavorable treatment during daily work, sexual and racist harassment, bullying (when a person is repeatedly and systematically subject to exclusion, hostility or harassment), or stalking (repeated intentional persecution and harassment of a person) as well as psychological and physical violence in or around the workplace.

SECTION 4: PROHIBITION OF DISCRIMINATION

Gateway Real Estate AG strictly prohibits its employees from discriminating against people in or around the workplace. The reason for discrimination shall not be of relevance.

SECTION 5: PREVENTION

Gateway Real Estate AG, in particular its Management Board and its executives, shall take preventive measures to create a working environment that is free of harassment and to prevent harassment, discrimination and violence as well as stalking or bullying in or around the workplace. Above all, this includes behavior that promotes appreciative and non-discriminatory interaction among people and respects the integrity of all employees.

SECTION 6: ADVICE AND COMPLAINTS

Persons affected are expressly encouraged to actively defend themselves against harassment, discrimination and violence, stalking or bullying. Among other things, persons affected can contact Gateway Real Estate AG's Compliance Coordination Office, which acts as an advisory and complaints office. The contents of any advice provided and any lodged complaints shall be kept confidential. Complaints shall not result in any form of disadvantages for the persons affected. The advisory and complaints office shall act in the equitable interest of all people involved.

The Compliance Coordination Office, as an advisory office, shall be the place to turn to for persons affected by discrimination; as part of the advisory services provided by the Compliance Coordination Office, the persons affected may obtain information about opportunities of support and their rights. The advisory office always tries, but is by no means obliged, to reach an amicable settlement to which all parties agree to ensure peace at the workplace.

The Compliance Coordination Office, as the complaints office, shall be responsible for the finding of facts. The complaints office shall also inform the person accused for discrimination, who in turn may respond to the complaint. Then, the complaints office shall resolve upon the next steps to be taken in the respective matter. Results and solutions/sanction measures shall be discussed by the Compliance Coordination Office with the full Management Board of Gateway Real Estate AG, which then makes the final decision.

SECTION 7: DATA PROTECTION

All data and information in relation to advice and complaints are protected by law. The applicable laws and regulations are the General Data Protection Regulation (GDPR), the Berlin Freedom of Information Act (Berliner Gesetz zur Förderung der Informationsfreiheit (IFG)), and Act on Data Protection and Freedom of Information of the German federal state of Hesse (Hessisches Datenschutz- und Informationsfreiheitsgesetz (HDSIG)).

SECTION 8: SANCTION MEASURES

Discrimination within the meaning of Section 3 of this policy represents a violation of personality rights and may result in corresponding legal consequences. Sanctions for incidents of discrimination may include, for example, oral or written instructions, warning letters, transfer to another job, termination of the working relationship, and criminal charges.

SECTION 9: REPORT AND EVALUATION

The Compliance Coordination Office as the complaints office has to report to the Supervisory Board of Gateway Real Estate AG on a semi-annual basis about its dealings in connection with this policy. The disclosures as regards any incidents of discrimination shall be provided in anonymized form. The information exchange between Supervisory Board and Compliance Coordination Office as the complaints office also serves the purpose of making continuous improvements to non-discrimination proceedings.