

# SUPPLIER CODE OF CONDUCT (SCOC)

The guiding principle of Gateway Real Estate AG's entrepreneurial activities is to operate and develop its business along the entire value creation chain based on a responsible and sustainable approach. Therefore, as far as the selection of suppliers is concerned, Gateway Real Estate AG focuses on total cost, quality, reliable delivery practices, contractual compliance, environmental awareness, and adherence to the requirements of this Supplier Code of Conduct (in the following the "Code" or "SCoC").

This Code describes the essential values and standards of action with regard to the upstream value creation chain of Gateway Real Estate AG. Gateway Real Estate AG enters into long-term relationships only with suppliers who share its values regarding sustainability.

Gateway Real Estate AG expects its suppliers to recognize, support and comply with the following ESG standards. These are based on the Ten Principles of the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

The Code sets out minimum standards of Gateway Real Estate AG that go beyond applicable laws and regulations and are part of all contracts between Gateway Real Estate AG and its suppliers. In the event of discrepancies between the requirements of laws and regulations and the business partner's own code of conduct on the one hand and this Supplier Code of Conduct on the other hand, the supplier must comply with the stricter provisions in each case.

Suppliers are individuals or legal entities who offer goods and/or services to Gateway Real Estate AG or who provide goods and/or services on behalf of Gateway Real Estate AG. In addition to suppliers who have a direct contractual relationship with Gateway Real Estate AG, this Supplier Code of Conduct also covers sub-suppliers and subcontractors of suppliers.

## GENERAL DUTY OF CARE

- [1] Suppliers shall comply with all applicable laws and regulations. Suppliers, including their employees, vendors and subcontractors, shall comply with the standards of this Code in their dealings with, for or in relation to Gateway Real Estate AG.
- [2] Suppliers shall properly fulfill their duties of care by means of suitable (risk) management systems, guidelines, principles, self-commitments and employee training. All corresponding instruments and measures shall be appropriate to the business activity of the respective supplier in terms of their nature and size.
- [3] Suppliers shall ensure that their own employees and the employees of their own suppliers and subcontractors can rely on a whistleblower program on an anonymous basis if violations against the Supplier Code of Conduct of Gateway Real Estate are identified; this whistleblower program shall provide for sanctions to be imposed in case of misconduct that is appropriately substantiated.
- [4] Gateway Real Estate AG follows a zero tolerance policy in the event of unethical business behavior such as corruption, bribery or forced labor.

### **CORPORATE GOVERNANCE**

- [1] Suppliers shall strictly prohibit any form of corruption (giving, receiving or arranging bribes, facilitation payments, kickbacks or accepting relevant gifts interrelated in terms of value and context). Suppliers shall neither accept an improper advantage in return for favoring a third party.
- [2] Suppliers shall preclude that the company or employees are involved in money laundering or the financing of criminal activities or that their actions violate any trade sanctions programs applicable in Germany.
- [3] Suppliers shall ensure that they act in compliance with all applicable antitrust and competition laws and do not engage in collusion regarding prices, volumes and market shares or disclose third-party competitive information.
- [4] Suppliers shall comply with all rules and regulations regarding product and transport safety as well as any commitments to quality and duties of care for all delivered goods (equipment, commodities, substances) and services – including any rules that may be established by Gateway Real Estate AG.
- [5] Gateway Real Estate AG expects its suppliers to comply with all legal and individual data protection requirements of the respective company of the Gateway Real Estate Group – including all contractually agreed obligations such as appropriate data protection measures. In addition, suppliers shall protect all confidential information of Gateway Real Estate AG, including intellectual property, and of their respective business partners.
- [6] Suppliers shall ensure that all necessary technical and organizational precautions are taken to protect any confidential information of the Gateway Real Estate Group and their respective business partners.

### **HUMAN RIGHTS**

- [1] Suppliers shall respect all nationally and internationally recognized human rights and exercise due diligence in terms of human rights.
- [2] Suppliers shall provide equal opportunities to their employees and shall not discriminate against anyone on the basis of ethnicity, gender or sexual orientation, disability, religious or political beliefs, or any other comparable characteristics.
- [3] Suppliers shall not tolerate physical, psychological, verbal or sexual harassment or abuse toward their employees.
- [4] Suppliers shall not employ children under the age at which compulsory education ends as provided for in the jurisdiction of the place of employment, provided that the age of employment shall not be less than 15 years.
- [5] Suppliers shall not employ persons in forced labor; this includes any labor or service that is required of a person under threat of penalty and for which the person has not volunteered.

### **LABOR RIGHTS, HEALTH AND SAFETY**

- [1] Suppliers shall ensure freedom of association for their employees (right to formation, join and be a member of a trade union) and the right to collective bargaining. If (private) unions are not allowed, suppliers must support other forms of employee representation.
- [2] Suppliers agree to pay employees at least the local minimum wage and to recognize their employees' right to adequate compensation.
- [3] Suppliers undertake to comply with local working hours that are in line with applicable laws and collective agreements. In the absence of such a regulation, the working time shall not regularly exceed 48 hours, or 60 hours including overtime, per working week.
- [4] Suppliers shall ensure the obligations as regards occupational health and safety applicable under the jurisdiction of the place of employment are complied with, in particular if specific risks of accidents at the workplace or work-related hazards to health arise otherwise. Suppliers shall take all necessary measures to prevent hazards and accidents at the workplace.

- [5] Suppliers shall comply with all applicable occupational health and safety rules and hygiene requirements of Gateway Real Estate AG and shall provide a safe and healthy working environment for employees and subcontractors working on the suppliers' behalf. All accommodations provided by the supplier shall be safe and comfortable and shall be non-hazardous to health.
- [6] Suppliers shall provide their employees with suitable trainings on the subject of occupational health and safety.

#### **SUSTAINABLE BUSINESS PRACTICES**

- [1] Suppliers shall use resources efficiently and shall ensure appropriate control of corporate processes to avoid adverse environmental impacts. This includes areas such as energy consumption and (air) emissions or other releases, water use and wastewater, raw materials, and waste/residuals.
- [2] In particular, suppliers shall record greenhouse gas emissions from their own operations and – where possible – along the value creation chain, and shall evaluate and undertake efforts to reduce them.
- [3] Suppliers shall seek to reduce any negative impacts on biodiversity arising from their business operations and shall act to protect biodiversity where appropriate.
- [4] Suppliers shall seek to improve the circular economy in their company.
- [5] Suppliers shall incorporate environmental protection into their compliance management.
- [6] Suppliers shall, upon request, provide Gateway Real Estate AG with relevant environmental and performance data enabling Gateway Real Estate AG to improve its environmental performance.

#### **CORPORATE SOCIAL RESPONSIBILITY**

- [1] Suppliers shall strive for positive social and economic development of stakeholders affected by their business activities and shall seek to minimize any negative effects of their activities on these stakeholders.
- [2] Suppliers shall seek to engage in an open dialogue with stakeholders affected by their business activities.

#### **FAIR COMPETITION**

- [1] Suppliers shall align their business policy with the criteria of fair and effective competition. Compliance with rules under competition law is part of Gateway Real Estate AG's corporate policy, and the Company also expects its suppliers to comply with such rules.
- [2] Suppliers shall comply with all applicable rules under competition law and reject any action that may lead to unfair competition.
- [3] Suppliers shall also comply with all applicable antitrust laws.

#### **AUDITS, SANCTIONS AND COMPLAINTS**

- [1] To ensure and demonstrate compliance with this Code, suppliers shall retain all relevant documentation and make it available to Gateway Real Estate AG upon request.
- [2] Gateway Real Estate AG reserves the right to conduct its own on-site audits or reviews, or have such audits or reviews conducted by appointed third parties, to ensure that suppliers comply with laws, rules and standards, and shall take appropriate measures affecting the business relationship if reasonable suspicions arise that this Code has been violated.
- [3] Gateway Real Estate AG reserves the right to terminate any business relationship if suppliers violate the principles of this Code and fail to take any measures to remedy such violations.
- [4] If suppliers have concerns about unlawful conduct or misconduct – including in connection with Gateway Real Estate AG – they may contact the Company's Compliance Coordination Office.