

Code of Conduct

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allreal

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The Allreal Code of Conduct describes the conduct expected of all employees in the performance of their professional activities for the company. It is based on the rules and principles of cooperation which are binding for the entire company and for all employees, and on the applicable regulations and laws.

1. Principles of cooperation

The company and the employees endeavour to work in a manner which is compliant with legislation, is based on partnership and is characterised by mutual respect.

It is a mandatory requirement to report known or suspected breaches of the Code of Conduct and/or of applicable laws.

Employees and third parties who report known or suspected breaches of the Code of Conduct in good faith are protected against any negative effects of so doing.

2. Behaviour and conduct based on integrity and compliant with legislation

2.1 Compliance with legislation

The company and its employees comply with the national and international laws that are relevant to business activities and to the performance of their professional activities.

Internal guidelines and regulations may exceed the requirements of the applicable laws.

Under no circumstances must compliance with all national and international laws, and with internal guidelines and regulations, be disregarded or jeopardised.

2.2 Bribery and corruption

No personal advantages may be requested, accepted, offered or granted in return for preferential treatment in connection with the initiation, award or processing of an order or contract. Neither officials, members of authorities, representatives of clients and contractors nor private individuals may be offered or provided with personal advantages of any type whatsoever, with the exception of giving and accepting generally customary invitations, gifts to mark special occasions and promotional gifts, as appropriate to the circumstances.

Any financial or family relationships and any relationships beyond those of a purely professional or business nature with representatives of authorities, suppliers, contractors or clients must be disclosed by employees of their own accord.

2.3 **Competition and antitrust law**

The company and its employees undertake to comply with applicable antitrust and competition laws.

In this regard, Allreal requires employees to comply with the following regulations in particular:

- business policy and prices are determined independently, and are not directly or indirectly discussed or agreed, either formally or informally, with competitors, rivals or other parties.
- agreements and arrangements of any type with competitors or other parties are impermissible and prohibited in connection with orders and contracts, clients and markets.

All employees who come into direct or indirect contact with clients or contractors are aware of the Federal Act on Cartels and Other Restraints of Competition (Cartel Act, CartA).

3. **Manner of working and behaviour**

3.1 **Harassment and discrimination**

The recruitment and assignment of employees at Allreal are based solely on their abilities, aptitude and track record. Women and men are accorded equal treatment in all respects.

Any different or disadvantageous treatment of employees and third parties on account of their ethnicity, skin colour, religion, nationality, origin, gender, sexual orientation and/or political or trade union activity or attitudes is prohibited.

Harassment, discrimination or disparagement of employees and third parties in the course of direct or indirect contact, in electronic or written correspondence and also in verbal form are prohibited.

Allreal respects the personal dignity and individual rights of employees and of third parties.

3.2 **Collaboration with third parties**

In connection with the acquisition as well as the placement of orders and contracts, the company and the employees undertake to select contracting parties who may be assumed to comply with the rules and principles described in the Allreal Code of Conduct and with the applicable regulations and laws, especially as regards compliance with provisions of labour and social insurance legislation, both within their companies and in collaboration with third parties.

Contracting parties who breach one or more provisions of the Allreal Code of Conduct must be informed immediately, and without any possibility of misunderstanding, that this will lead to termination of the contractual relationship.

3.3 Data protection and confidentiality

The company and the employees protect confidential information and data against disclosure to unauthorised parties both within and outside the company.

Employees who have access to business secrets or confidential information and data must not disclose such secrets, information and data to unauthorised third parties (also including family members, friends and acquaintances) at any time, both during the employment relationship and after its termination.

3.4 Safety and health at the workplace

Allreal attaches great importance to safety and health at the workplace. The relevant rules and specified requirements are binding on the company's own employees and also on employees of third-party companies.

3.5 Conflicts of interest

In order to avoid conflicts of interest and conflict situations which could arise in cases where personal interests clash with those of the company, the company's approval must be obtained for the performance of any additional activity, the acceptance of political offices or functions, and membership of bodies (boards, committees, etc.) in third-party companies or organisations.

3.6 Protection of the environment

The company and the employees protect the environment by consistently adhering to the provisions of environmental legislation.

By developing and planning environment-friendly projects, by implementing such projects with respect for resource sustainability, and by reducing the percentage of non-renewable resources in the company's total consumption of energy, Allreal contributes towards attainment of the CO₂ reduction targets set by policymakers.

4. Breaches of the Code of Conduct

Allreal consistently sanctions breaches of the law, the corporate principles and the Code of Conduct.

Employees and third parties who ascertain or suspect breaches of applicable laws, of the corporate principles or of the Code of Conduct should, as a mandatory requirement, report such circumstances immediately to an independent external body.

In such cases, information about suspected or actual breaches is submitted via the online form available on the intranet and on the company's website.

Should there be any doubts or uncertainties regarding the interpretation of the Code of Conduct or of the applicable laws, employees and third parties should contact the external body which is independent of Allreal.

The anonymity of whistle-blowers and confidential treatment of information are – and will remain – guaranteed in all cases. The independent external notification body ensures that there are no disadvantages for a whistle-blower as the result of such contact.

Breaches of the Code of Conduct and failure to inform the independent external notification body about known or suspected breaches of the Code of Conduct may entail disciplinary measures or termination of the employment relationship, and may lead to criminal charges.



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