* * * Supplier Code of Conduct * * *

§ 1 Preliminary note

The Sirius Group sees itself as a business partner with integrity, reliability and a sense of responsibility. We bear responsibility not only towards our employees* and business partners*, but also towards all people who are directly or indirectly influenced by our actions. We bear responsibility towards the society in whose structure we have been able to build our company and, last but not least, we also bear responsibility for the environment.

We strive holistically for ecological, socially responsible and ethical corporate governance. Therefore, we align our actions with the highest quality standards and expect our trade and business partners to subject their actions to the same standards. We are convinced that responsible action can only be sustainable and meet all requirements if our business partners share our ideals and in turn ensure compliance with the requirements of this guideline.

This Code is based on the United Nations Global Compact (UNGC), the International Labour Organisation (ILO) and the Universal Declaration of Human Rights (UDHR). In addition, the Sirius Group reserves the right to include further standards of conduct in this Code if it is convinced that compliance with them is necessary for responsible corporate governance.

The following Code applies comprehensively to all trading and business partners of the members of the Sirius Group: Sirius Real Estate Ltd. including all Dutch, British and Cypriot subsidiaries as well as all German subsidiaries in detail: Sirius Facilities GmbH, Curris Facilities & Utilities Management GmbH, LB2 Catering and Services GmbH, DDS Conferencing and Catering GmbH and SFG Nova Construction and Services GmbH.

§ 2 Integrity

2.1 Compliance with applicable law

Our trade and business partners comply with all applicable laws, regulations, ordinances and directives of a national and international nature.

2.2 Knowledge of laws and guidelines

Our trade and business partners* have the necessary knowledge to comply with the law. If they lack this knowledge, they obtain legal advice or ensure that they have the necessary legal knowledge on their own.

2.3 Priority of application of stricter national rules

Where regulations or laws exist that more strictly govern the contents of this Code, they shall take precedence and must be complied with.

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§ 3 Social responsibility: human rights and labour

3.1. Human rights

Our trade and business partners support and respect the protection of human rights and ensure that they are not complicit in human rights abuses. They recognise the principles of the Universal Declaration of Human Rights.

3.2 No forced labour

Forced labour, slave labour or work of a similar nature is unacceptable and must be avoided. Any employment relationship must have been entered into on a voluntary basis and must not have taken advantage of a forced situation of the employee, for example, to shape the remuneration or the working hours of the employee to his or her disadvantage. We expect our trade and business partners not to enter into an employment relationship under the threat of punishment or violence. Forms of modern slavery are not tolerated and must be refrained from.

The employment relationships can be terminated by the employee at any time, taking into account nationally applicable regulations such as civil or labour law.

Reference: Sirius Group refers to its Modern Slavery Statement.

3.3 Prohibition of child labour

Child labour is prohibited. Child labour must not take place or be encouraged at any stage of development, production or distribution. Our trade and business partners ensure that they are not involved in child labour. The definition of child labour is based on the principles of the United Nations Global Compact and ILO (International Labour Organization) Conventions 138 and 182. The minimum age of a child for employment or work must not be below the age at which compulsory schooling ends in the country in which the business partner is active.

3.4 Fair wages

Our trade and business partners pay their employees remuneration that complies with applicable laws and ensures a decent standard of living. Remuneration is expected to be fair and competitive and in line with the national legal minimum wage or the minimum standards customary in the industry. Workers shall be provided with all legally required benefits.

3.5 Fair working time

Working hours must comply with applicable laws or industry standards.

3.6 Freedom of association

Freedom of association and the right to collective bargaining must be upheld. Workers may form and join organisations of their choice and bargain collectively.

3.7 Non-discrimination

Our trade and business partners do not engage in discriminatory behaviour towards employees and job applicants on the grounds of racial or ethnic origin, gender, religion or belief, disability, age or sexual identity.

Reference: Sirius Group refers to its Diversity and Anti-Discrimination Policy.

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3.8 Health protection; safety at work

Our trade and business partners create a healthy and hazard-free workplace and working environment. The relevant national and international laws and guidelines must be complied with.

§ 4 Environment: Ecological responsibility

4.1 Reduce consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, shall be reduced or avoided. Production and maintenance processes shall be geared towards this.

4.2 Energy consumption

Energy consumption should be designed to be as efficient as possible. Energy consumption shall be reduced to a minimum. Where possible, alternative energies should be used or electricity from ecological sources should be used. Care should always be taken to conserve resources.

4.3 Impact

Our trade and business partners reduce the impact of their operations on biodiversity, climate change and water scarcity.

4.4 Handling of hazardous substances

When handling hazardous substances, our trade and business partners ensure safe handling with regard to production, storage, transport, processing and disposal.

§ 5 Ethical Business Conduct + Corruption Prevention

5.1 Fair competition

Fair competition is the basis for a fair and free economy. Our trade and business partners uphold fair competition and will not influence competition in an unlawful manner. Anti-competitive and restrictive agreements are to be refrained from. This includes disparaging the goods or services of a competitor, making factual claims about a competitor that are likely to damage the company's operations or credibility, price fixing between competitors, dividing up customers or sales territories, and other actions that are likely to prevent fair competition. National and international competition law must be complied with.

5.2 Intellectual property

The infringement of intellectual property is prohibited. National and international laws must be observed. In particular, compliance with copyright law, trademark law and patent law must be ensured. When exploiting intellectual property, it must always be ensured that a right of use exists.

5.3 Corruption, extortion, bribery

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Any form of bribery and corruption is prohibited. Benefits, e.g. in the form of invitations or in connection with advertising measures, donations and sponsoring or other benefits in kind are only permitted within the legally permissible framework.

In particular, pecuniary offences such as fraud, embezzlement, theft, embezzlement, tax evasion or money laundering are prohibited.

Reference: Sirius Group refers to its Anti-Bribery and Anti-Corruption Statement.

5.4 Confidentiality and data protection

National and international regulations on data protection and information security, in particular the General Data Protection Regulation, must be complied with. Extreme care must be taken when processing personal data or confidential data of employees, customers, tenants and third parties. Personal data may only be processed with the consent of the data subject, on the basis of a contractual arrangement or on another legal basis.

The misuse of data and the unauthorised disclosure or making accessible of data is prohibited. In particular, the disclosure or disclosure of business secrets is prohibited.

5.5. Information security

For the protection of personal data, confidential data and information as well as business secrets and other data and facts about which secrecy has been agreed, such technical and organisational measures shall be taken as guarantee the integrity and security. Here, the latest state of the art shall always be maintained, provided that this is reasonable and not disproportionate for our business and trading partners.

It must be ensured that only those who are authorised to do so have access to such data and information. In particular, unauthorised access from the outside as well as from the inside must be avoided.

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