

# Corporate Code

As amended in  
2017

**IMMOFINANZ**

# Corporate Code

IMMOFINANZ is committed to responsible management in accordance with the principles of integrity, honesty and transparency. Mutual trust as the underlying conviction forms the basis for constructive cooperation throughout the company and with business partners. In order to optimally meet these high standards, IMMOFINANZ places high demands for responsible and honest conduct on its employees, customers, suppliers, service providers and other contract partners. IMMOFINANZ's Corporate Code creates the foundation for all of the company's business activities and decisions. It is also the basis for the morally, ethically and legally correct behaviour of all Group employees.

## Values and Principles of the Corporate Code

### Compliance with legal requirements

We comply with all applicable laws and regulations in the countries where we conduct our business activities and also observe the local social norms.

### Observance of fundamental rights, respect and integrity

In accordance with the UN Charter and the European Convention for Human Rights, we see human rights as fundamental values. We are committed to the observance of human rights within our area of influence and reject any form of forced labour or child labour in our company or by our business partners.

We are committed to creating a working environment throughout the Group, which is distinguished by openness and mutual respect. The diversity of our workforce is a characteristic we see as an asset which improves our performance. We oppose any form of discrimination or harassment on the basis of gender, race, skin colour, religion, age, national/ethnic origin, disability or sexual orientation. All employees and applicants are treated equally.

### Employee development

We work to systematically develop the potential of our employees for the future of our company. In doing so, we focus on specialised professional training as well as social and methodical skills.

### Relations with employees and employee representatives

We respect the rights of our employees for the freedom of association. In our contacts with employee representatives, our goal is to achieve and maintain a long-term constructive dialogue.

### Conflicts of interest, fight against corruption

We always act in the best interests of IMMOFINANZ and maintain a strict separation between corporate and private interests. Even the appearance of a conflict of interest must be avoided. Decisions are taken in line with reasonable economic standpoints and in agreement with laws and standards. In our business relations, we comply with all relevant rules against corruption, bribery, fraud and money laundering. We do not accept gifts or benefits or enter into investments that could lead to a conflict of interest. Bribes or other illegal payments and benefits may not be accepted, offered or given.

### **Acceptance of gifts, granting of benefits**

IMMOFINANZ employees may not directly or indirectly request, accept, offer or grant unjustified advantages within the framework of their business activities. The only exceptions are gifts of small value and invitations within the scope of normal business hospitality. Strict standards must be applied in evaluating such situations, and the Compliance Officer should be contacted if there are any questions.

### **Competition, conduct on the market**

We are committed, without limitation, to fair competition with our competitors, business partners and other market participants. We are also committed to observing the laws against the restriction of competition in all countries where IMMOFINANZ conducts its business activities.

### **Relations with competitors, customers and associations**

Agreements with competitors and coordinated practices which are intended to limit or prevent competition are prohibited. In all contacts with competitors, it is important to ensure that no information is communicated, received or exchanged that could lead to conclusions over current or future market behaviour.

IMMOFINANZ employees may not restrict customers in any way or form in designing their supplier relationships or prices.

Participation in associations and attendance at their events may only take place for legally permitted purposes. Any comparison with competitors and the exchange of information must comply with the applicable laws.

If IMMOFINANZ employees should become involved in situations which are considered questionable under antitrust law, the discussions must be terminated immediately. The employee must leave the location and inform Compliance Officer.

### **Handling of confidential information**

IMMOFINANZ employees may not divulge any information on issues involving the company when these issues are not expressly intended for the general public. This also applies to information received confidentially from third parties. Employees may not use confidential information for their own benefit or for the benefit of third parties.

### **Insider information**

Persons with access to insider information are prohibited by law from trading in the related securities. IMMOFINANZ's internal compliance guideline contains instructions on the responsible handling of insider information. Special protection is provided for insider information through the establishment of confidentiality areas and the implementation of blackout periods for trading in the company's securities.

### **Information technology**

IMMOFINANZ places high priority on the legally and ethically correct utilization of information systems and gives high priority to IT security and data protection. Employees are required to use all available security measures to protect IMMOFINANZ's data on a regular basis.

### **Financial integrity**

In order to maintain a high level of trust on the part of shareholders, employees, business partners and the general public over the long-term, IMMOFINANZ's reporting must always be correct and truthful and comply with the relevant laws. The bookkeeping and accounting records are kept in accordance with legal, official and tax regulations and in agreement with internationally accepted accounting standards.

### **Responsibility for the environment**

IMMOFINANZ's services are provided with respect for the environment. Our activities are proactive with a focus on environmentally friendly technologies and the continuous systematic improvement of our company's environmental efficiency. Compliance with applicable environmental rules and regulations is a minimum requirement. Our responsibility for the environment also includes close cooperation with our business partners and support for initiatives that work to create a greater awareness of environmental responsibility.

### **Business partners**

We expect our business partners to comply with all relevant legal requirements and branch standards in their interaction with IMMOFINANZ. Moreover, we encourage our business partners to introduce and implement similar principles for responsibility wherever possible.

### **Relations with the media and shareholders**

Maintaining good relationships with our shareholders and the media is important for IMMOFINANZ's reputation. We therefore attempt to address inquiries and concerns as quickly as possible. Inquiries from investors and the media concerning the company and its business activities should be passed on to the Head of Investor Relations/Corporate Communications without delay. Proprietary or non-public information may not be released without the approval of the Executive Board.

### **Implementation**

We expect each and every employee to feel personally responsible for compliance with this Corporate Code. IMMOFINANZ is working to provide its employees with the necessary support and advice to ensure its continuous implementation. Employees should contact their supervisor if there are any questions concerning possible conflicts or alleged violations. The IMMOFINANZ Compliance Officer, in her role as an independent representative, is also available for consultation. Reprisals against employees who draw attention to violations will not be tolerated.

The Executive Board of IMMOFINANZ AG

### **Legal Note**

This Corporate Code represents the fundamental position of IMMOFINANZ. It cannot be interpreted as the basis for requiring specific actions from or justifying contractual claims against IMMOFINANZ.

### **Compliance Office**

Lucia Kautzky, Compliance Officer, can be contacted at any time for confidential consultations as follows: +43 699 1685 7259 or at [lucia.kautzky@immofinanz.com](mailto:lucia.kautzky@immofinanz.com).

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