



## Ethic Code for Business Partner – Declaration of Consent

UBM Development AG ("UBM") has developed an ethic code for itself, the high standards of which should also apply equally to its business partners and the business partners of its Group companies.

UBM's business model is strictly oriented towards ecologically, socially and ethically fair business practices. In order to integrate ecological and social responsibility even more strongly into the entire value chain, UBM has set corresponding behavioural requirements in the following Ethic Code.

The requirements of this Ethic Code are based on national and international laws and regulations as well as conventions such as the Universal Declaration of Human Rights, the European Convention on Human Rights, the United Nations Guiding Principles (in particular the Guiding Principles on Business and Human Rights), the OECD Guidelines for Multinational Enterprises and international labour standards of the International Labour Organisation (in particular the ILO Fundamental Principles).

The Ethic Code applies to all parties from whom UBM purchases products or services. These are referred to below as "Business Partners".

UBM expects its business partners to comply with this Ethic Code in every respect and to impose the provisions of this Ethic Code in full on all subcontractors and all parties who otherwise provide services or are involved in orders.

With regard to business partners who do not comply with those requirements, UBM reserves the right to take appropriate measures at any time to ensure compliance with the provisions of this Ethic Code, which may ultimately also lead to the suspension or immediate termination of an order relationship.

### Sustainability Requirements

The Contractor undertakes to comply in full with the requirements set out below at all times:

#### 1. Anti-Corruption

Business partners of UBM are obliged to refrain from and combat any form of corruption, bribery or gift acceptance. Both the direct and indirect offering and acceptance of benefits is strictly prohibited if this is intended to influence business transactions in an improper manner or could even create such an impression.

It is therefore prohibited to grant benefits to employees of business partners, whether public or private.

Business partners must choose their behaviour carefully when dealing with other companies. Even the appearance of corrupt- or unethical behaviour is inadmissible and must be avoided.

UBM prevails in the market through competitive prices, excellent performance and skills of its employees and the associated high quality and strives for sustainable business relationships based on fairness, transparency and trust.



Business partners shall ensure that the actions of employees do not conflict with their professional obligations or run counter to those obligations that the respective business partner has towards its contractual partners. The appearance of a conflict of interest must also be avoided.

## 2. Fair Competition

UBM's business partners are obliged to comply with transparent and fair conduct in the market.

Agreements and concerted practices with third companies, in particular competitors, which have the effect or purpose of restricting competition are to be refrained from and will not be tolerated.

Agreements with suppliers and subcontractors with the aim or the de facto effect of restricting competition are to be refrained from.

As a matter of principle, competition-relevant information may not be disclosed to third parties outside the company. Competition-relevant information is the knowledge of which enables other market participants to better assess competition on a certain market or in a certain project. If it is done, the competition authority could assume that this exchange of information serves to coordinate certain behaviour.

## 3. Economic Sanctions and Export Control

UBM's business partners are obliged to comply with applicable economic sanctions and export control laws.

Illegal actions to obtain financial or economic advantages are not permitted. Business partners of UBM must not provide any services or enter into any agreement which encourages economic crime or which results in UBM's direct or indirect involvement in it.

Business partners may not use financial resources for illegal activities (e.g. tax evasion, fraud) or for their support.

## 4. Human Rights and Working Conditions

UBM respects fundamental- and human rights in every respect and expects the same from its business partners. Compliance with the Equal Treatment Act is assumed: discrimination on the basis of ethnic origin, skin colour, age, gender, sexual orientation, political conviction, national origin, religion, disability, marital status, social class, economic or any other status (*compliance with the Equal Treatment Act*) is prohibited. Personal dignity, privacy and personal rights of each individual are respected and are inviolable.

UBM also attaches great importance to ensure fair working conditions: child or forced labour (*based on Convention No 29, 105 and 138 of the International Labour Organisation ILO*) is not tolerated. Business partners are therefore forced to identify risks related to human trafficking, child labour and forced labour throughout the entire supply chain in order to prevent human rights violations.

Fair pay, fair recruitment and promotion, safety at work, promotion of equal opportunities as well as freedom of association and the right to collective bargaining (*Charter of Fundamental Rights of the*



*European Union*) must be guaranteed. Rights and obligations between employer and employee shall be set out in writing.

Business partners commit themselves to ensure that the working environment is free from offensive, violent, threatening, disruptive or other inappropriate behaviour, including sexual harassment, psychological hardship, discrimination and bullying.

Furthermore, business partners are committed to promote equal opportunities, respecting the personal dignity, privacy and personal rights of each individual, which are inviolable.

## **5. Health and Safety**

UBM is committed to a safe and healthy working environment and strict compliance with safety regulations. Workplace health encouragement is implemented as part of consistent quality assurance.

Business partners of UBM undertake to create a safe and healthy working environment. Compliance with statutory working hours, rest breaks and daily rest periods is mandatory.

## **6. Environmental Protection**

The business partners are obliged to promote environmental protection by operating in an environmentally and climate-friendly manner. This includes the economical use of natural resources, the protection of biodiversity, the proper disposal of waste and the avoidance of soil- and water contamination.

Business partners must review the entire value chain for environmental risks and develop solutions where necessary.

In particular, business partners commit to the following:

- emissions of greenhouse gases (*environmental protection*) are actively minimized;
- use of building materials with higher environmental requirements, therefore materials with lower impact in terms of greenhouse gas effect or grey energy consumption, where use is economically and technically feasible. Likewise, the use of product forms close to raw materials and locally available materials with resulting shorter transport routes and lower pollution;
- careful handling of waste and hazardous materials is ensured, with effective waste management through a systemic approach to reduce solid waste and dispose of and recycle responsibly;
- safe transport, storage, use and disposal of chemicals and other hazardous materials that pose a risk if released into the environment is ensured to prevent land contamination through leakage or spillage;
- contamination of soils is avoided;
- no polluted waste water is discharged;
- efficient use of natural resources (*careful use of water and energy, use of environmentally friendly materials or processes and/or energy-efficient equipment, collective travel when travelling*).



## **7. Capital Market Compliance**

UBM complies with the principles and organisational measures for the prevention of market abuse in the form of insider trading, unlawful disclosure of insider information and market manipulation in the implementation and concretisation of the regulations of the Market Abuse Regulation (Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014, "MAR") and the supplementary legal acts as well as the Stock Exchange Act 2018 (BGBl I 2017/107, "BörseG").

UBM's business partners are obliged to prevent market manipulation in their company and to refrain from any involvement in insider trading, insider dealings or inappropriate procurement or disclosure of insider information.

## **8. prevention of money laundering, terrorist financing and economic crime**

The business partners are fully committed to combating money laundering. Actions which have the purpose of concealing the fact that components of assets originated from an illegal source are to be refrained from.

The business partners are fully committed to the fight against terrorism and its financing. The provision of a financial contribution to support a terrorist organisation or the commission of a terrorist offence is to be refrained from.

Illegal acts for the purpose of obtaining financial or economic advantages are inadmissible. Business partners of UBM must not provide any service or enter into any agreement which favours economic crime or which results in UBM's direct or indirect involvement in it.

Business partners of UBM undertake to pay taxes and duties in a proper manner.

Business partners of UBM may not use financial resources for illegal activities (e.g. terrorism, tax evasion, fraud) or for their support.

## **9. Data Protection**

The business partners undertake to handle personal data in a trustworthy and responsible manner. This means that all uses of personal data are in accordance with the applicable data protection laws - in particular the EU General Data Protection Regulation (GDPR) and its national accompanying legislation.

## **10. Responsibility in the Use of information**

UBM's business partners undertake to protect personal- and confidential information from unauthorised and improper use, disclosure, access, loss, modification, damage and destruction.

Business partners of UBM undertake to respect the intellectual property rights of UBM and others.

Business partners of UBM must apply security measures that protect entrusted information as well as physical and IT-related assets.



UBM business partners commit to use social media platforms responsibly and to communicate politely and respectfully in public and online.

UBM and its Group companies expect their business partners in every respect to identify risks within their supply chains and subcontractors and to take appropriate measures against them. UBM and its Group companies reserve their right to take appropriate measures at any time against subcontractors who do not meet these requirements, which may ultimately lead to the suspension or immediate termination of a contractual relationship with the business partners.

By signing the document, the contractor undertakes to act responsibly and to comply with the principles and requirements listed at all times. The Contractor confirms that it communicates the contents of this Code to its employees, subcontractors and suppliers in a comprehensible manner and obliges them to comply with it.

UBM is entitled to review compliance with the standards and regulations required by this Code at any time.

### **Reporting of a Breach of this Ethic Code**

If a violation of this Ethic Code is observed on the part of a business partner or even an employee, this can be reported at any time via a link on the UBM website via a "Whistleblowing System".

The possibility to point out breaches of contract anonymously is therefore guaranteed.

UBM Development AG  
(or a company branch / SPV)

Business Partner  
(*Subcontractor or Supplier*)



**DECLARATION OF CONSENT - Acknowledgement of the UBM Ethic Code:**

Company

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confirms

- to have read and accepted the UBM Ethic Code,
- meet the requirements and expectations set out in this Ethic Code, in particular
  - o Anti-Corruption;
  - o fair competition;
  - o human rights and working conditions;
  - o Health and Safety;
  - o Environmental protection;
  - o Capital Market Compliance
  - o avoidance of money laundering and terrorist financing
  - o Data Protection
- comply with applicable laws and regulations in the country or countries in which it operates.

Furthermore, we commit ourselves to act responsibly and to adhere to the principles and requirements set out. Our subcontractors are checked for compliance with the above sustainability requirements and are obliged to fulfil them.

Place , Date

Signature Business Partner  
(*subcontractor or supplier*)

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