



## **QUALITÄTYMANAGEMENT | Work Instruction S8.04\_2020**

### **S8. Legal & Corporate**

#### **CODEX TO ACT FOR SUBCONTRACTORS**

##### **1. Instruction**

The negotiation minutes shall include a signed subcontractor's declaration (./Appendix 1). By separate signing of this subcontractor's declaration (./Appendix 1) in orders with a fee/order volume of more than EUR 20.000.—(incl. VAT) the contracting parties - all subcontractors, suppliers and business partners (explicit also brokers, consultants, lawyers, ..) - shall secure a strong quality element within the contractual relationship.

If the subcontractor refuses to sign the subcontractor's declaration (./Appendix 1) the already negotiated order will not be signed for the time being and the compliance officer must be informed immediately. He decides, possibly together with the executive board on the further procedure.

##### **2. Targets**

- determines the processes to ensure sustainability requirements for ecologically, socially and ethically fair business practices;
- UBM's high ethical standards must also equally apply for business partners;
- uniform, UBM-wide declaration for all areas of the entire value chain;
- ensuring the right qualification of the subcontractor;
- documentation and reporting system in case of non-compliance with the sustainability requirements;
- consequences of non-compliance with the requirements of these codex obligations. Measures of an escalation process.

##### **3. Scope**

###### 2.1. Scope, Organisation

This working instruction applies to all management levels and employees of the UBM group including their daughter companies, SPV's and shares.

###### 2.2. Involved Management levels

- UBM group board as Supervisory Committee;
- country board for the operational implementation and for control;

###### 2.3. Validity

This working instruction S8.04:2020 comes newly in force.

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Dateiname: S8.04\_2020\_E P360 Codex to act for Subcontractors.docx

Inhaltsverantwortlich/Ersteller: M. Löcker

freigegeben: VORSTAND UBM | 01.10.2020

verteilt an „UBM AG + Tochtergesellschaften“ | 01.10.2020

Druckdatum: 22.09.2020

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## 4. affected areas, description of the process

### 4.1. declaration´s content

The sustainability requirements of UBM can be summarized as:

- ✓ *anti-corruption;*
- ✓ *fair trade;*
- ✓ *economical sanctions and export control;*
- ✓ *human rights and working conditions;*
- ✓ *working safety and healthiness;*
- ✓ *environment protection;*
- ✓ *capital market compliance;*
- ✓ *prevention of money laundering, terrorist financing and economic crime;*
- ✓ *data protection;*
- ✓ *responsibility in using informations;*
- ✓ *notification of non-compliance with the requirements of this codex.*

### 4.2. Corework

- a signed subcontractor´s declaration (./Appendix 1) shall be obligatory included in the negotiation minutes as well as in orders with a fee/order volume of more than EUR 20.000.— (incl. VAT) signed by all contracting parties including all subcontractors, suppliers and business partners (explicit also brokers, consultants, lawyers, ..).
- selection of suitable subcontractors taking into account the conditions of this codex and the market;
- preparation and follow up of quality measures for a high responsibility and a contractual regulation of the framework conditions of UBM-codex with his subcontractors;
- to form a common, structured definition of steps, objectives and tasks for above mentioned chapters. Establish responsibilities and document all necessary activities up to the end of the assigned responsibility;
- working in a partnership and value engineering in a fair competition including subsequent subcontractor´s relationships. Promoting teamwork and transparency within the project.
- fulfillment of requirements in accordance with the capital market compliance;
- implementing a warning instrument with a low threshold with a whistleblower system to ensure the quality measures and objectives of the above mentioned chapters.

### 4.3. Output

- securing ecologically, socially and ethically fair business practices within the UBM-group and his subcontractors, suppliers and business partners (explicit also brokers, consultants, lawyers, ..).
- signing this subcontractor´s declaration (./Appendix 1) as a special commitment at the starting point in a contractual relationship;
- control measures for compliance and improvements of the above mentioned chapters;
- documentation of sustainability requirements in the project including all activities post finish;

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freigegeben: VORSTAND UBM | 01.10.2020

verteilt an „UBM AG + Tochtergesellschaften“ | 01.10.2020

Druckdatum: 22.09.2020

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- mutual, proactive know-how transfer and exchange of lessons learned in the sustainability competence of UBM and his subcontractors, suppliers and business partners;
- ongoing evaluation, coordination and ensurement of all objectives, tasks and processes, responsibilities and documentation of the above mentioned chapters;
- archive the subcontractor´s declaration on the Server within the respective trade as well as at Z:\important documents\Z1 signed contracts.

UBM Development AG

A handwritten signature in black ink, appearing to be "T. G. Winkler".

T. G. Winkler

A handwritten signature in black ink, appearing to be "M. Löcker".

M. Löcker

A handwritten signature in black ink, appearing to be "P. Thate".

P. Thate

Vienna, October 1st, 2020

Appendix: ./1: subcontractor´s declaration;

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Distribution: all employees of the UBM group including their daughter companies, SPV´s and shares.

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freigegeben: VORSTAND UBM | 01.10.2020

verteilt an „UBM AG + Tochtergesellschaften“ | 01.10.2020

Druckdatum: 22.09.2020

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