

Code of Conduct for Employees

Deutsche Konsum REIT-AG (DKR) designed its code of conduct based on the internationally known standards for responsible corporate governance. The code of conduct is based on the labour social standard of the International Labour Organization (ILO) and the Global Compact of the United Nations (UN).

Our employees must comply with the code of conduct. An overview of the fundamental principles of the Code of Conduct is provided below:

1. Harassment and Discrimination

Our employees are responsible to ensure an environment free from discrimination where everyone will be treated equally regardless of their nationality, gender, age, marital status, religion or belief, disability, or any other grounds for discrimination.

The German General Act on Equal Treatment (Allgemeines Gleichbehandlungsgesetz - AGG) prohibits all forms of discrimination and harassment in the workplace. As the Company's liability is to comply with the national laws, any act of harassment or discrimination is prohibited. The rule applies also to selecting and recruiting for job positions or training programs.

2. Fair Working Conditions

We at DKR attach great importance to maintaining a fair and cooperative relationship with our employees. The well-being of the employees is elementary to achieving the Company's business goals. We fully comply with the national German laws and regulations to ensure adequate working conditions. These include in particular, the Minimum Wage Act (Mindestlohngesetz), the Posted Workers Act (Arbeitnehmer-Entsendegesetz) and the Temporary Employment Act (Arbeitnehmerüberlassungsgesetz).

The Minimum Wage Act assures employees of a mandatory minimum remuneration that is subject to regular adjustment.

The Posted Workers Act is the foundation to implement a minimum standard of working conditions in regard to the sector. This Act is of particular importance to the construction industry. The regulations need to be specified and determined in collective agreements and are generally meant to contain wage, vacation entitlement, occupational health and safety policies.

Furthermore, the Temporary Employment Act regulates the hiring of temporary and leased workers for economic activities. The law includes limitations on temporary work as well as standards to secure the well-being of the employees and to prevent them from exploitation.

3. Anti-corruption and Bribery

According to the German laws that prohibit corruption and bribery, the Company is in full compliance and any violation is unacceptable. Bribery can have different forms, such as the giving of cash, unsuitable discounts, gift cards, or any other forms, all of which are strictly prohibited. Violation of the law will lead to serious consequences, and all employees, contractors and third parties must comply with the law.



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Gifts and invitations will only be accepted or granted if they are of moderate value and are a gesture of courtesy in line with general business practice.

4. Data Protection and Security

Non-publicly available information received by the employees is considered confidential data. Such information is treated strictly confidential by the employees, unless the disclosure of data is required by law. Information may only be disclosed to authorised persons.

The Company is providing annual training sessions to the employees regarding data protection. These sessions are conducted by external professionals.

5. Money Laundering

Money laundering is the process of making money generated from illegal activities appear as if it had a legal origin. The Money Laundering Act (Geldwäschegesetz) exists to prevent and punish such transactions and to prevent them. It regulates how financial flows are controlled and defines money laundering as a criminal offence. DKR has decided to outsource its Money Laundering officer to an external service provider. The Money Laundering Officer also provides training sessions to the employees to raise awareness and to avoid any form of participation in money laundering.

6. Child Labour and Forced Labour

According to the German Supply Chain Act (Lieferkettengesetz), child labour and labour abuse are prohibited. DKR ensures safe and fair working conditions in accordance with German law so that employees can exercise all their labour rights.

7. Human Rights

DKR only operates in Germany, where human rights are a cornerstone in every aspect. We respect the human rights and dignity of people in all our activities. Our employees are in compliance with the laws and Company's values where human right is practised to the full extend.

8. Health and Safety

We are committed to providing a safe and healthy working environment in our offices and at our properties. The health and safety policy is implemented by providing complete guidelines for safety measures to our employees and third parties.

9. Environmental Protection

We are conducting our business in a sustainable manner by minimising the negative environmental impacts. We are reducing our GHG emissions by introducing renewable energy into our portfolio, and we are making sure to carry out all refurbishment activities in a sustainable manner where wastes are recycled.

Moreover, our energy policy ensures the reduction in energy consumption. We strive to go beyond compliance by enhancing the energy efficiency of our portfolio.

