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Compliance Policy

6B47 Group



6B47 REAL ESTATE INVESTORS AG
www.6B47.com

6B47
REAL ESTATE INVESTORS

**Compliance Policy
Guidelines 6B47 Group**

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1. DEFINITIONS AND SCOPE

Compliance stands for the adherence to laws, regulations, internal company guidelines as well as internal instructions. These policy guidelines apply to all employees and board members of the 6B47 Group, hereinafter referred to as "employees" or the "6B47 Group".

The purpose of this Compliance Policy is therefore to provide all employees of the 6B47 Group with guidance on conduct in key areas of the 6B47 Group and thereby avoid liability claims arising or other legal disadvantages for the 6B47 Group and its employees. In addition, compliance serves to establish transparency within the 6B47 Group.

2. DUTY TO INFORM

Each employee shall inform himself/herself about the EU directives, laws, regulations and internal instructions applicable to his/her area of responsibility.

3. FUNDAMENTAL BEHAVIOURAL REQUIREMENTS

Every **employee** is committed to

- complying with the laws, regulations and internal instructions applicable in his or her area of responsibility ("compliance with the law");
- to work together in a fair, respectful and trust-based manner and to avoid any form of discrimination. This applies in the internal environment as well as to dealings with external business partners and other third parties.
- to respect and promote the reputation of the 6B47 Group;
- to avoid conflicts of interest between business and private matters;
- not to gain any unlawful advantage for themselves or others;
- to comply with the laws and regulations on occupational safety, environmental protection and data protection;
- Report compliance violations without delay. Contact see point 16 - Contact persons.

Moreover, every **supervisor** has the obligation

- to judge employees only on the grounds of their performance and to ensure compliance with this policy in his or her area of responsibility.

4. EQUAL TREATMENT

Discrimination on the grounds of race, ethnic origin, gender, religion, ideology, disability, age or sexual identity, as well as harassment, bullying and xenophobic acts are strictly prohibited. This applies not only to dealings with colleagues, employees and business partners, but also and already when hiring, promoting or dismissing employees.

5. PROHIBITION OF BRIBERY AND CORRUPTION

In simple terms, corruption is the abuse of entrusted power for private gains or advantages. Corruption is any breach of duty or abuse of authority in exchange for an advantage, in both the public and private areas.

Corruption also harms competition, prevents "fair play", is not commensurate with the 6B47 Group's corporate values and exposes the company and its employees to unnecessary liability risks.

It is strictly forbidden

- to offer, promise or grant a personal advantage to domestic and foreign public officials (public authorities) in connection with their official position for the performance or omission of an official act;
- to offer, promise or grant personal benefits to employees or representatives of domestic or foreign companies for actions or omissions in breach of duty;
- to support the unlawful acts of other persons;
- having unlawful acts carried out with the assistance of others, for example relatives, friends, agents, advisers, planners, suppliers, customers and intermediaries
- to demand or accept personal benefits for actions or omissions in breach of duty.

6. INVITATIONS, GIFTS AND EVENTS

Invitations and gifts are part of the interactions between people and polite behaviour. The employees of the 6B47 Group may extend invitations and give gifts to business partners as well as accepting invitations and gifts from them, provided that these are within reasonable limits.

In order to avoid even the appearance of corruption, the following rules shall apply:

- Employees of the 6B47 Group must refuse invitations and gifts if they are obviously or presumably connected with a concrete expectation of any kind of consideration. The same applies if they are connected with an award situation in terms of time or content.
- You must refuse invitations and gifts also in the case that accepting them would violate the law or internal directives.
- Employees of the 6B47 Group are not permitted to demand gratuities.
- In case of doubt as to the appropriateness, the respective superior shall be consulted.

The same applies to the granting of benefits.

- The participation in as well as the active realization of professional events by employees of the 6B47 Group is permitted and desired.
- Invitations to and participation in societal, civic and recreational events in the

business environment are permissible if they are within reasonable limits. Under no circumstances may they even give the impression of harming fair competition or of mixing interests.

7. AVOIDANCE OF CONFLICTS OF INTEREST

Each employee must strictly separate his or her private interests from the interests of the 6B47 Group. Already the appearance of a conflict of interest must be avoided.

In order to achieve and ensure this, the following orders may only be placed in the name of 6B47 and the following activities may only be carried out if these correspond to customary market conditions and stand up to an arm's length comparison and, moreover, have been approved in writing by the respective responsible managing director or board of directors:

- Orders placed with close relatives (spouse, partner, children, siblings, parents, close relatives of partners in direct line (children, siblings, parents) and persons living in the same household for at least 1 year) and business partners with whom the respective employee also has a private business relationship)
- Contracts awarded to companies in which related parties are employed
- Contracts placed with companies in which an employee or a related person has a shareholding of 5% or more
- Secondary activities for competitor companies
- Secondary activities for business partners.

Employees who wish to acquire a direct or indirect interest of 5% or more in a competitor company, or who already hold such an interest, shall inform their respective supervisor as well as informing to compliance@6b47.com .

8. COMBATING MONEY LAUNDERING

The 6B47 Group works exclusively with reputable business partners who operate within the framework of legal regulations and do not make use of illegal financial resources.

Every employee must comply with the laws on the prevention of money laundering and terrorist financing and immediately report any suspicions in this regard to compliance@6b47.com .

9. COOPERATION WITH BUSINESS PARTNERS, CUSTOMERS AND SUPPLIERS

6B47 expects employees, business partners, customers and

suppliers to comply with all applicable laws, in particular

- With regard to refraining from corruption;
- compliance with the International Convention on Human Rights;
- compliance with the laws against child labour;
- the observance of the laws of international commerce

(in particular the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the ILO Guiding Principles on Fundamental Principles and Rights at Work);

- o the protection of the health and safety of all employees;
- o compliance with the relevant national laws and international standards on occupational safety, environmental protection and data protection;

as well as these points being also implemented and complied with in their own supply chain.

10. OCCUPATIONAL SAFETY AND ENVIRONMENTAL PROTECTION

In order to ensure the health and safety of all employees and visitors, every employee must comply with the applicable laws, regulations and standards on occupational safety at his or her workplace.

Every employee shares responsibility for environmental protection in his or her area of work and is obligated to comply with the relevant laws, regulations and standards on environmental protection. 6B47 is aware of the negative impact of its economic activities on the environment, and therefore seeks to promote environmental protection in order to minimise such impact. Consequently, in all projects the prudent use of natural resources, land and energy is strived for as far as possible. In order to ensure products that are as environmentally and climate friendly as possible, 6B47 makes use of acknowledged and renowned building certification systems that promote sustainable building standards and higher environmental requirements for building materials.

11. DATA PROTECTION

As an internationally active company, the use of modern information and communication technology represents an indispensable part of business processes for 6B47.

In this context, employees are obligated to treat personal data sensitively in all business processes. Personal data may only be collected, used and retained in accordance with applicable data protection legislation. This applies to employee data, as well as to data from business partners, customers, suppliers, competitors and other persons and third parties.

In particular, data may only be processed if the data subject has previously consented or if this is legally permissible for other reasons.

12. PROTECTION OF CORPORATE PROPERTY

Company and operational assets must be handled with due care. As a matter of principle, company property may not be used for private purposes or for activities that do not serve the purpose of the company. The private use of company property is only permitted if corresponding internal regulations provide for such use. Intellectual property such as copyrights, trademark rights and patent rights are also valuable assets that must be duly protected against unauthorised use.

The purchase and sale of company assets must be transparent, comprehensible, economical and in line with market conditions. Personal interests of individual employees must not influence decisions and economic transactions.

13. BEHAVIOUR TOWARDS COMPETITORS

Agreements, coordination and concerted actions and practices with third companies, in particular competitors, which have the effect or pursue the purpose of restricting competition are not permitted and will not be tolerated.

14. DONATIONS AND SPONSORING

6B47 makes donations in cash and in kind for non-profit and charitable causes and purposes such as education, science, art, culture, sports and social welfare.

Donations may only be granted after obtaining the prior written consent of the respective Managing Director.

6B47 is also active as a sponsor of events and projects in favour of non-profit and charitable causes.

Sponsorship and the making of donations shall be in accordance with applicable laws and the foregoing regulations.

15. CONSEQUENCES OF COMPLIANCE VIOLATIONS

Violations of the Compliance Policy Guidelines may result in the following consequences for employees:

- Warnings
- Termination/dismissal
- Claims for damages by third parties and by 6B47
- Fines and penalties
- Prison sentences

With regard to the 6B47 Group, compliance violations may have the following consequences:

- claims for damages by third parties
- costly litigation
- fines and profit skimming
- image losses

16. CONTACT PERSON:

Problems with compliance or violations of these Compliance Policy Guidelines must be reported. There are 2 courses of action for this.

Reports and issues can be sent in written form directly to compliance@6b47.com .

Anonymous reports can be made by way of our whistleblowing platform Whisper.

<https://app.whisper.law/t/6b47>

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