

## Code of Conduct for Suppliers\*

alstria believes that the best way to maintain a good reputation and the trust of its business partners and public is to treat every element of its business with the highest level of integrity standards. For this reason, alstria established a Code of Conduct for its employees, which sets basic legal and ethical standards. This Code of Conduct for Suppliers establishes similar requirements for alstria's suppliers.

alstria expects all its suppliers to abide law and all applicable regulations, in particular:

### **CONDUCT TOWARDS EMPLOYEES**

At alstria, we expect that our suppliers respect and comply with the fundamental rights granted to all employees under applicable German law and regulations.

### **HUMAN RIGHTS**

At alstria, we are fully committed to our responsibilities to respect human rights. We are designated to ensure that we are conducting ourselves in a manner that is consistent with high ethical standards. Within the entire group we are especially respecting the UN Guiding Principles on Business and Human Rights which are grounded on the recognition that states and companies are obliged to respect human rights. States are primarily responsible for protecting the human rights of their citizens. It is the obligation of states to translate their international human rights duties into national regulation and laws to ensure that human rights are protected. In situations when national laws do not cover internationally recognised human rights or the implementation of such laws is weak the UN Guiding Principles clearly expect companies to operate according to a higher international standard. In Germany, the degree to which human rights are respected and protected by the government is rather high. alstria is a German real estate company focusing solely on German office property. Thus, alstria operates in the framework of the German law and obeys the rules and regulations concerning human rights accordingly. alstria is designated to avoid causing or contribution to adverse human rights impacts through our own activities and also expects its suppliers to fully observe human rights.

### **CHILD LABOR and FORCED LABOR**

At alstria, we expect our suppliers to prohibit and refrain from any kind of child labor and forced labor within their organization.

### **REMUNERATION AND WORKING TIME**

At alstria, we expect our suppliers to fully comply with the German working time law, and minimum wages where it applies.

### **OCCUPATIONAL HEALTH AND SAFETY**

At alstria, we expect our suppliers to fully comply with German laws governing health and safety at work. Moreover, our suppliers are expected to train their employees for the purpose of preventing accidents at work and occupational diseases as best as possible.

### **FREEDOM OF ASSOCIATION**

At alstria, we expect our suppliers to respect the rights of their employees, to the full extent permitted by applicable German law, to form a workers' council, to enter into an employee representation and collective bargaining.

---

\*This document is applicable to suppliers, service providers, business partners and craftsmen of alstria office REIT-AG and its majority owned subsidiaries.

## **DISCRIMINATION AND HARASSMENT**

At alstria, we expect that our suppliers promote equal opportunities and equal treatment. Furthermore, we expect our suppliers to prohibit any form of discrimination in recruiting, promoting or selecting employees for training programs or job assignments. Within the organization of our suppliers, no employee may be discriminated against based on his or her gender, age, ethnic group, skin color, nationality, social origin, political attitude, sexual orientation, religious conviction, ideology or disabilities.

## **CORRUPTION AND BRIBERY**

As corruption and bribery is prohibited by applicable law, no such behaviour is tolerated by alstria. alstria expects all suppliers acting on its behalf to avoid even the impression of such misconduct. At no time should suppliers acting on behalf of alstria make any kind of grants to public officials. Monetary gifts to business partners are strictly prohibited and perceived as (attempted) bribery. During an ongoing negotiation any kind of grants, invitations for events or hospitality are not permitted. Beyond that with regard to alstria's employees, suppliers shall not make any grants in a value higher than EUR 50.00 net and shall limit invitations for events or hospitality to an assumed net-value of EUR 150.00.

## **MONEY LAUNDERING**

At alstria, we expect our suppliers to comply with all applicable law governing the prevention of money laundering and not participating in any money laundering activities.

## **ENVIRONMENTAL PROTECTION**

At alstria, we expect our suppliers to comply with all applicable national laws, regulations and standards to protect the environment.

## **UNRESTRICTED COMPETITION**

At alstria, we expect our suppliers to always compete in a fair manner and to comply with applicable antitrust laws and regulations. Our suppliers are expected neither to enter into agreements with competitors that might constitute a breach of antitrust law, nor to take advantage of any dominant market position they might hold.

## **CONFIDENTIALITY**

It is inevitable that alstria's suppliers might receive confidential information during a business relationship. This information is to be treated strictly confidential at any time. Sharing or publishing such information requires the permission of alstria. If confidential information were provided in error, alstria's suppliers should promptly notify alstria and not distribute such information.

## **CONFLICTS OF INTEREST**

alstria's suppliers and employees should not have any financial or other relationship that could cause a conflict of interest or give the impression of a conflict of interest. Any relationship or behavior that might influence alstria's employees not to act in the best interest of alstria should be strictly avoided. Therefore, suppliers should not employ or otherwise make payments to any employee during the course of any business process. If a family relation (spouse, same or opposite sex partner, parent, parent-in-law, sibling, grandparent, child, grandchild, uncle, aunt, cousin, niece and nephew) is given, the supplier shall disclose this information to alstria.

## **SUB-CONTRACTORS**

alstria's suppliers shall aim for their own sub-contractors to comply with this Code of Conduct for Suppliers.

## **SYSTEM OF CONTROL / GRIEVANCE MECHANISMS**

At alstria, we ask our employees to report to their superior or the Compliance Officer, if it comes to their attention that suppliers infringe the law or this Code of Conduct. Additionally, alstria has established a compliance hotline with an external law firm where employees may report violations anonymously. Employees need not fear any sanctions due to the reporting of incidents that came to their attention.

For any inquiries or complaints please contact [suppliers@alstria.de](mailto:suppliers@alstria.de).