



Code of Conduct for employees*

1. Ethics and compliance

LEG Group's business culture is shaped by morals and integrity. This creates trust among our customers, employees, investors and business partners and contributes to the Company's good reputation. We comply with applicable standards and laws, regulations, our internal rules and guidelines and organisational instructions. Our employees and managers implement this in their daily work.

2. Confidentiality and data protection

We protect confidential information and data. In the course of their work, employees and managers receive confidential or protected information about the Company, our customers, business partners or other stakeholders with whom we interact. Employees and managers ensure the confidentiality of this information and use it only for the purpose for which it was submitted. We will provide accurate, timely and understandable information to the public or our customers and business partners. Our data protection management and our external Data Protection Officer advise on and monitor compliance with data protection regulations, in particular the provisions of the General Data Protection Regulation. The data protection management team and the Data Protection Officer are available as contact persons for the management, employees, tenants and business partners of LEG as well as the supervisory authority if required.

3. Corruption and money laundering

Corruption or acts similar to corruption, as well as business dealings in any form related to money laundering, will not be tolerated and will be strictly punished by the Company (zero tolerance). Accepting cash and paying with cash is generally not permitted. The acceptance of benefits such as gifts and invitations can influence the objective ability to make decisions and is therefore, like the granting of benefits to business partners, only permitted in accordance with internal Group regulations.

4. Conflicts of interest and transactions

We avoid personal conflicts of interest. Employees or managers do not use their professional position to gain personal advantages for themselves, their family members or third parties. Employees and managers are prohibited from doing business with, or competing with, LEG Group companies outside of established regulations. Secondary activities are subject to approval.

5. Competition and openness

We create honest competitive conditions and deal with our customers and business partners openly and fairly. Employees and managers do not gain competitive advantages through illegal or unethical business practices. Customers or business partners are not taken advantage of by anti-competitive agreements or behaviour or by manipulation, concealment or misuse of information.

* For reasons of better readability, all gender-specific designations are used for persons of all genders.



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6. Human rights, occupational health and safety

We treat each other openly and respectfully within the company and do not commit any unjustified discrimination against our employees, customers or business partners. In particular, we do not tolerate discrimination on the basis of or ethnic origin, gender, religion or belief, disability, age or sexual identity. The personal dignity and individual appreciation of each person are essential elements in our dealings with employees and colleagues. We make personnel decisions in the interests of the company and free of any discrimination.

We respect and support internationally recognized human rights. We comply with the legal requirements regarding minimum wage, working hours and vacation entitlement. We strictly reject all forms of forced and child labor. We recognize the right of all employees to form and join employee representative bodies. We comply with the regulations on occupational health and safety.

7. Professionalism and assets

We work professionally, maintaining and increasing the LEG Group's assets. Employees and managers protect the Company's assets from misuse and ensure that they are used efficiently through their professional work. We use assets only for legitimate business purposes.

8. Financial reporting

We ensure the correctness and accuracy of our financial and non-financial reporting and thus create trust. With our internal control system, we pursue the objective of ensuring that accounting-relevant business transactions are carried out correctly, promptly, authoritatively and completely. We regard this as an obligation to all our stakeholders – both internal and external.

9. Participation in political and social debate

We always act non-partisan and politically neutral. Whenever we express our views on political or social issues, we do so transparently, making our Company known and in a culture of open dialogue with political opinion leaders. Direct or indirect donations to politicians or political parties are not permitted. Two months before elections, we avoid public appearances with political figures. We publish our association and club memberships on our website.

10. Environmental protection

Our aim is to achieve high standards in environmental protection and thus make our contribution to a healthy living environment and the achievement of climate targets in Germany. All applicable environmental laws are complied with.

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11. Whistleblowing system

Employees and managers who become aware of existing or potential violations of laws or internal regulations can report this to their supervisor or the Compliance Officer or report the incident anonymously via a digital whistleblowing system (<https://www.bkms-system.com/LEG>).

All reports will be treated confidentially and processed only by selected and specially trained employees.

Discrimination, intimidation or hostility towards whistleblowers by LEG employees as well as other reprisals against the whistleblower by employees will not be tolerated by LEG and will be treated as a potential compliance violation.

12. Contact person

If you have any questions about compliance and this Code of Conduct, please contact our Compliance Officer Dr. Armin Hutner (armin.hutner@leg-se.com).

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