

Whistle blower system

LEG has implemented a comprehensive whistleblowing system in 2005 in order to address compliance risks and ethical business risks.

Persons who have reasons to believe that board members or employees of LEG have acted contrary to compliance rules can contact their supervisors, the compliance officer or the external ombudsman. The latter is a qualified external lawyer and can, therefore, guarantee the whistle blower anonymity and – within the limits of the law - has a right to refuse information to the public prosecutor's office and to the corporate management.

The external ombudsman can be contacted by employees, customers, suppliers and other third parties via an external website / email address. This possibility is pro-actively communicated to employees in our intranet. Furthermore, as part of our onboarding program, the ombudsman also introduces himself to our new employees and encourages them to turn to him in relevant cases. New suppliers are informed by our procurement department. General advice can also be found in our annual report.

After being informed of indications of possible compliance violations, the ombudsman evaluates such indications and decides independently to forward these indications to the compliance officer who then is in charge to verify the facts of the case and to treat a compliance violation according to the applicable laws and the internal rules of LEG.

If a whistle blower demands a consideration from LEG for information, the following principles apply:

- LEG does not pay for information.
- LEG makes no other "monetary" commitments.

All confirmed rule violations will be dealt with appropriately and independently of the position of the person concerned in the company (zero tolerance). In addition, the „principle of equal treatment“ is implemented, i.e. equal violations of the rules are treated equally.

The decision on any measures to be taken against employees is made by the personnel department in coordination with the management of the employee in charge.

The compliance officer analyses in cooperation with the legal department, the internal audit department and other specialist departments, to what extent the existing processes are to be optimized due to the violations in order to prevent the risk of further violations of similar infringements.

The measures taken are documented in the legal department. The documentation of possible steps under labor law is carried out for data protection reasons in the personnel department.

According to our code of conduct and our company culture, our non-retaliation policy prohibits any adverse action being taken against whistle blowers.

In 2019 and in 2020 there has been no material complaint so far.

General Counsel

LEG Immobilien AG

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