

## Code of Conduct for employees

# The LEG Code of Conduct

### 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. The Compliance Officer and our external ombudsman are available to employees and managers as contact persons in this regard. 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 as well as to the external Ombudsman, who is obliged to maintain confidentiality as a lawyer.

### 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.

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### 6. Employment and equal treatment

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 race 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.

### 7. Professionalism and wealth

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. 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.

### 9. 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.