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Deutsche EuroShop

CODE OF CONDUCT
BUSINESS PARTNERS & SUPPLIERS

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GENERAL INFORMATION

Background and scope of application

Deutsche EuroShop is a public limited company under German law. The company is based in Hamburg. Deutsche EuroShop is Germany's only public limited company that invests exclusively in shopping centers in prime locations. Its property portfolio includes shopping centers in Germany, Austria, Poland, Hungary and Czechia.

We are committed to responsible corporate governance. Sustainability and economic efficiency, as well as the shopping experience and environmental awareness, are not seen as contradictions, but as compatible objectives. However, ethical, social and ecological sustainability can only be fully implemented if it is supported and practised throughout the value chain.

This document lists the basic principles of conduct that we believe are consistent with ethical, social and environmental responsibility. Deutsche EuroShop expects its business partners and suppliers to conduct their business activities with integrity, fairness and sustainability. This Code of Conduct is in line with our corporate values.

The scope of this Code of Conduct covers all business partners and suppliers of Deutsche EuroShop, as well as their subsuppliers.

Our principles as the basis for cooperation with business partners and suppliers

Deutsche EuroShop is committed to environmentally and socially responsible corporate governance. We communicate our principles and guidelines openly and transparently on our company website. These include in particular:

- Deutsche EuroShop Code of Conduct
- Corporate Governance Statement
- Climate and environmental policies (policy on climate protection and energy, policy on environmental protection and waste, and policy on water use)

The contracting parties shall base their future cooperation on the following rules of a joint code of conduct. This agreement forms the basis for all future joint business activities. Both parties undertake to comply with the established principles and requirements and to support each other in doing so.

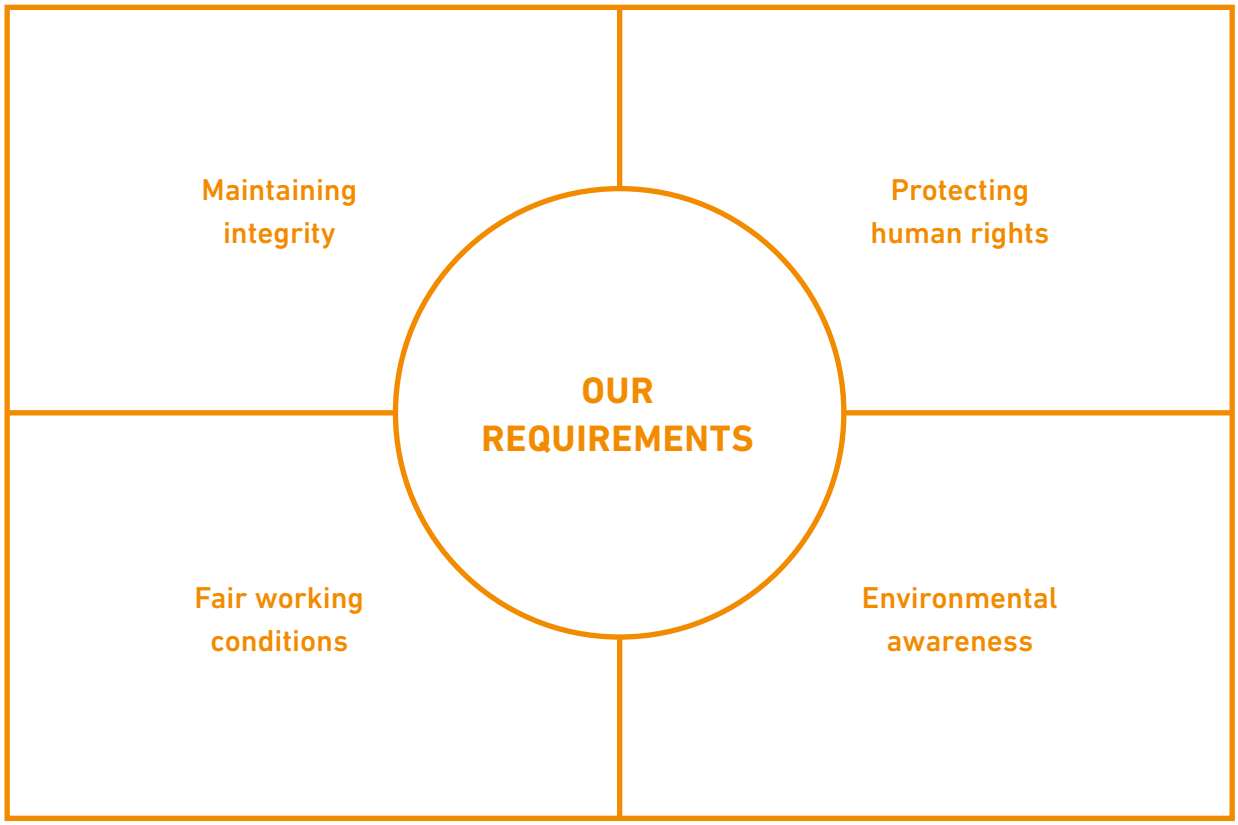


Requirements for business partners and suppliers

We expect our business partners and suppliers to share our principles of environmentally and socially responsible corporate governance and to take these into account in their actions. This includes, in particular, maintaining integrity, protecting human rights, fair working conditions and environmental awareness. Our business partners and suppliers undertake to comply with the behavioural requirements listed below ("Comply") or to provide transparent reasons why compliance is not possible or only partially possible ("Explain").

Where possible, our business partners and suppliers shall ensure that their own partners and subcontractors also comply with the standards and regulations set out in this Code of Conduct.

This agreement is valid from the date of its signing. Violations of this Code of Conduct may result in us terminating the business relationship, including all existing supply contracts.



CODE OF CONDUCT – DECLARATION BY BUSINESS PARTNERS

Ethical responsibility

Compliance with laws, rules and regulations

Our business partners and suppliers comply with applicable national and international laws and regulations, as well as official regulations and rules published by authorities. If there are differences between the conduct specified in this Code and the local regulations applicable to our business partners and suppliers, the more restrictive regulation shall take precedence.

◯ Comply
◯ Explain

Zero tolerance for bribery, corruption and undue advantage

Our business partners and suppliers undertake to apply the highest standards of integrity in all business activities. No forms of bribery, corruption, extortion or embezzlement are to be approved, accepted or offered. They also undertake to report any attempt or suspicion immediately.

◯ Comply
◯ Explain

We understand bribery to mean (attempted) payments of any kind (monetary value, valuables, services, etc.) to persons (civil servants, employees or representatives of state, public or international organisations or other third parties in the public or private sector) with the aim of influencing actions or decisions. We understand corruption to mean the (attempted) acceptance of a bribe, regardless of the subsequent actions and decisions. We understand the acceptance of advan-

tages to mean gifts (or promises thereof) to public officials and elected representatives for the provision of a service, whereby official duties are violated.

Prevention of money laundering

Our business partners and suppliers ensure that they only engage in legal business activities with reputable business partners whose funds come from legal sources. Their business conduct complies with applicable regulations and recommendations, such as those of the Financial Action Task Force (FATF) and the Money Laundering Act (GwG).

◯ Comply
◯ Explain

Commitment to fair competition practices

Our business partners and suppliers are committed to fair, compliant and transparent competition. They strictly reject agreements with competitors regarding prices, markets or customer groups, as well as anti-competitive influence or unfair business practices. Their conduct is guided by applicable laws that protect and promote competition, in particular antitrust laws and laws against unfair competition.

◯ Comply
◯ Explain

Dealing with conflicts of interest

All actual and potential conflicts of interest are avoided or disclosed in writing by our business partners and suppliers. Conflicts of interest arise when personal interests conflict with the interests of Deutsche EuroShop. They can occur, for example, when employees of our business partners and suppliers have a personal relationship with one of our employees.

◯ Comply
◯ Explain

Data protection and confidential information

In accordance with the General Data Protection Regulation (GDPR), our business partners and suppliers protect all personal data that is processed or obtained in the course of our joint business relationships. All business data and information obtained in the course of our joint business relationships must be treated confidentially. Our business partners and suppliers guarantee protection against unauthorised disclosure to third parties.

◯ Comply
◯ Explain

Social responsibility

Respect and protection of human rights

Our business partners and suppliers adhere to the United Nations International Bill of Human Rights and conduct their business in accordance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. They do not tolerate human rights violations.

◯ Comply
◯ Explain

Prohibition of forced labour, modern slavery

Our business partners and suppliers adhere to the standards of the International Labour Organisation (ILO) and do not tolerate any form of forced labour, human trafficking, debt bondage or any form of slavery. Particular attention should be paid to the Conventions on Forced and Compulsory Labour (C029 and P029 of the ILO), the Abolition of Forced Labour (C105 of the ILO) and the League of Nations Convention on the Abolition of Slavery, the Slave Trade and Institutions and Practices Similar to Slavery.

◯ Comply
◯ Explain

Prohibition of child labour

In accordance with the UN Convention on the Rights of the Child and the standards of the International Labour Organisation, our business partners and suppliers undertake not to permit or tolerate any form of child labour. They act in accordance with the UN Convention on the Rights of the Child and ILO Conventions C138 on the minimum age for employment and C182 on the prohibition and immediate elimination of the worst forms of child labour.

◯ Comply
◯ Explain

Harassment and violence

The personal dignity, privacy and personal rights of each individual must be respected at all times. Our business partners and suppliers protect their employees from physical, psychological and sexual violence in the workplace, in accordance with Convention 190 of the International Labour Organisation and the General Equal Treatment Act (AGG) as well as in accordance with the UN Women's Empowerment Principles.

◯ Comply
◯ Explain

Prohibition of discrimination

In accordance with the UN Charter of Human Rights, the standards of the International Labour Organisation and the General Equal Treatment Act (AGG), our business partners and suppliers undertake to prevent and not tolerate any form of discrimination. No employee may be treated unfairly on the basis of gender, marital status, origin, nationality, religion, age, disability or sexual orientation. Financial discrimination must also be prevented, for example in accordance with the Convention concerning Equal Remuneration for Men and Women Workers for Work of Equal Value (C100 of the ILO).

◯ Comply
◯ Explain

Health protection and occupational safety

In accordance with the standards of the International Labour Organisation and applicable national and industry-specific regulations for ensuring occupational safety and health protection (such as the German Occupational Safety and Health Act), our business partners and suppliers are committed to creating safe and healthy working conditions in the workplace.

◯ Comply
◯ Explain

Fair working hours

Our business partners and suppliers comply with applicable laws and minimum standards regarding working hours and rest periods. These include, for example, the requirements of the EU Working Time Directive, the standards of the International Labour Organisation and the requirements of the German Working Hours Act.

◯ Comply
◯ Explain

Appropriate, fair remuneration

In accordance with the standards of the International Labour Organisation, our business partners and suppliers pay their employees at least the statutory minimum wage or the minimum wage prescribed in the industry (in Germany, this is the Minimum Wage Act and the Collective Bargaining Autonomy Act). They pay fair wages and ensure equal pay for work of equal value. In addition, employees must receive all benefits required by national law or industry agreements. Unjustified salary deductions and deductions as disciplinary measures are not permitted.

◯ Comply
◯ Explain

Respect for freedom of association and the right to collective bargaining

Our business partners and suppliers comply with the standards of the International Labour Organisation and, in Germany, with the Collective Bargaining Act and the Works Constitution Act with regard to their employees' rights to form trade unions, engage in collective bargaining and participate in works councils.

◯ Comply
◯ Explain

Environmental responsibility

In order to fulfil our environmental responsibility and continue to implement our sustainability strategy, we have set out principles and guidelines as well as targets and measures in three environmental policies. These consist of our "Climate Protection and Energy Policy", our "Environmental Protection and Waste Policy" and our "Policy on Water Use". The relevant documents can be viewed at any time on our company website. We expect our business partners and suppliers not to act in a manner that conflicts with our sustainability strategy and environmental policies.

◯ Comply
◯ Explain

Specifically, this means

- avoiding, reducing or offsetting greenhouse gas emissions and using energy more efficiently.
- reducing air, water and soil pollution caused by business activities.
- making water consumption more efficient.

FINAL PROVISIONS

Compliance with the Code of Conduct for Business Partners and Suppliers

Independent monitoring

Our business partners and suppliers who have signed our Code of Conduct undertake to monitor compliance with the conduct and standards listed therein.

◯ Comply
◯ Explain

Reporting violations

Any actual or potential violation of the conduct set out in this Code and/or any further violations of the law by employees of Deutsche EuroShop or a business partner or supplier must be reported immediately.

◯ Comply
◯ Explain

Clear points of contact are available for reporting violations. Employees can confidently contact their superiors or the compliance office directly. Alternatively, the anonymous whistleblower system can be used, which can be accessed at any time and from any location via the following link: www.deutsche-euroshop.de/Compliance

Controls

Deutsche EuroShop reserves the right to carry out its own checks and inspections to ensure compliance. Violations of the rules of conduct set out in this code and/or any other legal violations will not be tolerated under any circumstances and may result in the suspension of cooperation and termination of the contractual relationship.

◯ Comply
◯ Explain

Accessibility and validity

By signing this document, our business partners and suppliers undertake to act responsibly and to comply with the principles and requirements set out herein. In addition, our business partners and suppliers shall ensure that the contents of this Code of Conduct are communicated clearly and comprehensively to their employees, agents and subcontractors. They shall take all necessary measures to ensure the implementation of this Code of Conduct.

Our Code of Conduct for Business Partners and Suppliers is available to our external stakeholders and the public at any time on our website. The Code is available for download to interested readers.

The Code of Conduct for Business Partners and Suppliers takes effect immediately. It remains valid until replaced by an updated version. All related content is reviewed regularly and updated as necessary. Changes require approval by the Executive Board.

Signature by the signing company

Company

Name / Position

Place, Date

Signature

With _____ page(s) Appendix

Publication details

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Legal notice:	This Code of Conduct reflects the understanding of sustainability of Deutsche EuroShop AG. It serves as a guide, but does not establish any contractual obligations or enforceable claims against the company.
Translation notice:	Convenience translation – the German version is the only binding version.
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APPENDIX

Reasons/explanations for individual points

Topic/section	Reason/explanation