

Group Policy on Corporate Social Responsibility

Short description

Apleona's Group Policy on Corporate Social Responsibility provide an overview of the Group's activities and approach to the different aspects of corporate social responsibility.

The aim of the guidelines is to increase transparency within the Group and to provide our stakeholders as for example shareholders, customers, suppliers, service providers, subcontractors and other affected social groups with a concise and comprehensive summary of the activities we undertake in assuming our corporate social responsibility.

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0. Introduction

As a company, we benefit from good social framework conditions including a strong education system, reliable political processes, a healthy environment and social equilibrium. As a responsible company, we want to play a positive role in shaping the society of the future. Therefore, we are mindful of the impacts of our business operations on our shareholders, customers, employees, suppliers, subcontractors and other community groups (together “stakeholders”) concerned, as well as on the economic, ecological and socio-cultural environment in which we operate. In order to remain sustainably successful in the long-term, we must respond to political, legal, financial, environment-related, social and technological changes and developments.

By publishing this Group Policy, our aim is to present our activities and approach to the various topics of corporate social responsibility with complete transparency. The term “Corporate Social Responsibility (CSR)” is the generic name for a value system which is implemented in various dimensions by the management through sustainable and value-oriented corporate governance (otherwise known as Corporate Sustainability Leadership). The individual aspects of corporate social responsibility can be assigned to the three traditional dimensions of sustainability: economy, ecology and social issues/society. Similarly, DIN ISO 26000 defines seven core themes of social responsibility. The United Nations also describes ten global principles of responsible corporate leadership. The following graphic provides an overview of the relational structure of the value system.

Fig. 1: Relational structure of the corporate social responsibility value system

Corporate Social Responsibility (CSR)					
Corporate Sustainability Leadership					
Economic sustainability		Ecological sustainability	Social sustainability		
Corporate Governance	Economy	Ecology	Socio-cultural	Corporate Citizenship	
Compliance / Anti-corruption measures	Market opportunities (including through sustainability)	Resources / Materials efficiency	Diversity management	Corporate donations	
Leadership culture / Corporate ethics	Earnings optimisation / Cost efficiency	Climate protection (Energy management ISO 50001, CO ₂ -reduction)	Health & safety in the workplace	Corporate sponsorship	
Transparency / Reporting	Risk management	Circular economy (reuse, disposal)	Employee orientation / Advanced training	Company foundations	
Management systems (ISO 9001)	Value-added chain management / Supply chain management	Voluntary certifications (DGNB, BREEAM, GEFMA 160, ISO 14001)	Occupational safety / Work-Life-Balance	Charitable commitment	
DIN ISO 26000		4. Environment	2. Human rights 3. Work practices 7. Integration and community development		
UN Global Compact		7-9. Environment and climate	1-2. Human rights 3-6. Labour standards		
DNK German Sustainability Code		Environmental concerns 11. Consumption of natural resources 12. Resource management 13. Climate-related emissions	Labor concerns 14. Labor rights 15. Equal opportunities 16. Qualification	Human rights 17. Human rights	Society 18. Local community
Strategy 1. Strategic analyses and measures 2. Materiality 3. Objectives 4. Depth of the value-added chain		Process management 5. Responsibility 6. Rules and processes 7. Controlling 8. Incentive schemes 9. Involvement of stakeholders 10. Innovation and product management	Compliance 19. Political interference 20. Conduct in compliance with laws and guidelines		

Own graphic based on

- ZIA/ICG (Ed.): Nachhaltige Unternehmensführung in der Immobilienwirtschaft, 2015 [Corporate Sustainable Leadership in the Real Estate Industry], p. 62
- DIN ISO 26000, chapter, 6.1, fig. 3
- UN Global Compact: Ten principles of responsible corporate leadership
- DNK German Sustainability Code

In this document, we present a summarised overview of our activities and approach to corporate social responsibility, and have structured these below according to the seven core topics defined in DIN ISO 26000:

1. Organisational leadership / Governance
2. Human rights
3. Work practices
4. Environment
5. Fair operating and business practices / Compliance Management System
6. Consumer concerns
7. Integration and community development

0.1 Member of the Institut für Corporate Governance in der deutschen Immobilienwirtschaft e.V.

Apleona is a member of the Institut für Corporate Governance in der deutschen Immobilienwirtschaft e.V. (ICG). The ICG concerns itself with many issues relating to value-driven, sustainable corporate leadership, including the correct development of the German Corporate Governance Code and its implementation. Through its membership, Apleona makes a significant contribution to the establishment and further development of the aspects listed above. Proof of our membership can be viewed on the ICG website at the following link:

<https://icg-institut.de/mitglieder/>

Apleona's existing Compliance Management System is certified externally by the ICG regularly. More details are provided in point 5. Fair operating and business practices / Compliance Management System.

0.2 Affiliation with the UN Global Compact

Apleona joined the United Nations Global Compact (UNGC) initiative on 11/09/2017. This is the largest and most important responsible corporate leadership initiative in the world. Based on its ten universal principles, the initiative pursues a vision of an inclusive and sustainable global economy, working for the benefit of all people, communities and markets. The ten principles of the UNGC initiative are subdivided into four main topics

- Human rights (objectives 1-2)
- Labour standards (objectives 3-6)
- Environment and climate (objectives 7-9) and
- Corruption prevention (objective 10)

and can be found at the following link:

German: <https://www.globalcompact.de/de/ueber-uns/Dokumente-Ueber-uns/DIE-ZEHN-PRINZIPIEN-1.pdf>

English: <https://www.unglobalcompact.org/what-is-gc/mission/principles>

Through its participation in the UNGC Initiative, Apleona provides its customers, suppliers, service providers, sub-contractors, the professional community and its employees with documentary evidence of its commitment to responsible corporate leadership. We have undertaken to publish an annual report entitled "Communication on Progress" (COP) about our activities and the progress we have made in supporting the ten principles. Proof of our affiliation with the UNGC, and our COP report can be viewed on the United Nations website at the following link:

Membership: <https://www.unglobalcompact.org/what-is-gc/participants/120401-Apleona-GmbH>

Progress reports: <https://www.unglobalcompact.org/what-is-gc/participants/120401-Apleona-GmbH#cop>

0.3 Sustainability of our business operations

We are convinced that the success of a business can only be assured in the long-term when economic, ecological and socio-cultural considerations are harmonised with due respect for legal regulations and ethical aspects. Apleona issues an annual sustainability report which describes all pertinent economic, ecological and social aspects of our business activities.

The status report is publicly available on our website and can be downloaded by our stakeholders and, for example, owners, banks, customers, business partners, suppliers, service providers, NGOs or the professional public in the internet from the following link:

- German: <http://www.apleona.com/ueber-apleona/verantwortung/>
- English: <http://www.apleona.com/en/about-apleona/responsibility/>

The aim is to gradually improve reporting by collecting detailed and uniform data on key sustainability aspects throughout the Group. The report is updated annually and is published on our website.

1. Organisational leadership / Governance

1.1 Group policy on corporate social responsibility

Corporate social responsibility and sustainable, values-driven corporate leadership are an integral part of our corporate values. They are protected and continuously developed through clear management responsibility as well as specific Group Directives and instructions relating to key issues.

This document presents a summarised version of the essential aspects of corporate social responsibility and corporate sustainable leadership. The Group Policy are reviewed every three years by the Management Board and expanded or amended as necessary. The Group Policy serve as a guide for the business activities of all of Apleona's Business Units. However, they also enable other stakeholders to learn about our activities in the field of corporate social responsibility.

1.2 Corporate name, values and culture

The rebranded company name "Apleona" was officially announced to our more than 20,000 employees and to the professional community on 4 October 2016. The name includes the Greek word "pleon" which means "more" or "added value". The two first and last letters "A" of the name symbolize the circle of life "from beginning to beginning" [German: **A**nfang bis **A**nfang]. The word "LEO" (lion) which is also contained in the name emphasizes the strength of our performance. The name "Apleona" stands for our promise to enhance the potential of properties, facilities and processes throughout their entire life-cycle, and thus to generate added value for our customers. As a condensed corporate philosophy, for internal and external purposes we use the tagline

"Realising Your Full Potential".

Under the aegis of the new corporate name and tagline, we pursue a joint corporate culture which applies to all locations in equal measure and is characterised by the following three succinctly expressed corporate regulations:

ATTITUDE: We champion individuality

authentic – responsive – collaborative

- We do not just offer off-the-shelf solutions but provide solutions tailored to the individual requirements of our customers.
- Our "people's business" builds on characters and personalities – shaped by trust, attentiveness and reliability.
- At the same time, we respect the applicable laws and pertinent standards, strive for equitable, cooperative interactions, and are guided in our business dealings by ethical requirements.

PERFORMANCE: We create real impact

efficient – precise – sustainable

- We develop and realise solutions that provide added value for our customers – whether in commercial, technical, process-related or financial terms.
- Geared towards efficiency and longevity, and driven by the high quality standards of "German Engineering".

STYLE: We strive to inspire

dedicated – smart – imaginative

- We strive to be an inspiring, enriching and motivating partner.
- Characterised by a solution-oriented approach, inventiveness and creativity, as well as proactive and passionate commitment and far-sighted thinking.

1.3 Risk management

In order to achieve lasting success in the marketplace, corporate sustainability leadership must consider the economic influences and effects of its own actions as well as ecological and social factors Apleona has instituted an "Internal Control System" (ICS) which is designed to detect financial and operational risks at an early stage, and if necessary to initiate specific countermeasures. In particular, the following processes are examined:

- Procurement process (Purchase to Pay)
- Selling process (Order to Cash)
- Intercompany process (Company Process)
- Personnel process (Hire to Retire)
- Finance / Accounting process (Financial Reporting)

Various corporate departments and support functions conduct risk analyses and control and monitor the necessary measures. These include the Risk Management & Assurance, Controlling, Corporate Development, Procurement, Legal & Compliance and Human Resources functional departments.

Their primary objectives are to increase the effectiveness and efficiency of our business processes, preserve the integrity of our financial reporting and ensure strict compliance with the applicable laws and regulations. In addition, strategic and operational risks are also considered and the following measures are adopted to counteract them:

- Dependence on large customers: expansion of our customer base to encompass many different industries and extending our performance spectrum to offer individual, combined and integrated services,
- Estimating and executing risks in the service business: intensive review of the services to be provided and those that have already been provided, contract conditions, our skills and capacities, and conducting regular internal reviews throughout the term of a contract,
- Deviations from the strategic annual plan: monthly controlling of relevant key figures (e.g. volume, EBITA, cashflow, orders received, HSEQ indicators, etc.).

Apleona's ICS is continually developed. This includes, for example, the definition of audit standards and the ongoing development of tools and methods. In general, the ICS supports our company in maintaining the provisions of the law, controlling risks and avoiding fraud and mistakes, and encouraging modern corporate leadership.

2. Human rights

By affiliating ourselves with the UN Global Compact, we have undertaken to support the protection of international human rights, and to observe and make sure that we are not complicit in human rights violations. We also pass this obligation on to our suppliers, service providers and subcontractors in the supply and value-added chains by requiring that they sign a "Code of Conduct for Subcontractors and Suppliers". Apleona requires its subcontractors and suppliers to comply with the principles of the Global Compact Initiative and the minimum requirements of our Code of Conduct. If a suspected violation of the Code of Conduct by a subcontractor or supplier is found to be substantiated, or if a subcontractor or supplier is believed to be insufficiently diligent in its duty to provide information and cooperate, Apleona is entitled to immediately terminate the business relationship with the subcontractor or supplier concerned on the strength of its existing contractual or statutory rights. In the event of a violation of the Code of Conduct, Apleona reserves the right to institute further legal measures, in particular, claims for compensatory damages.

3. Work practices

3.1 Occupational safety

The well-being and health of our employees, business partners, customers and real estate users has the highest priority for Apleona. Our objective is: zero accidents. Strict adherence to safety provisions and the Apleona Life-Saving Rules by all employees and the responsibility of every individual for their own safety and the safety of the community are integral elements of our safety culture. Apleona regularly conducts training courses, safety programmes and campaigns to ensure the continuous improvement of our occupational safety performance.

Accidents can only be prevented if employee awareness of the measures to maintain occupational health and safety is constantly raised and is an unquestioned element of their work, and if our managers actively and consistently demand workplace safety and the implementation of safety provisions.

3.2 HSEQ (Health, Safety, Environment, Quality)

Our conduct is centered around our customers' satisfaction. For this reason, we attach great importance to the first-class quality of our services as well as to the services of our suppliers, service providers and subcontractors in the areas of quality, the environment and occupational health and safety. These aspects are managed and coordinated by our central HSEQ (Health, Safety, Environment, Quality) department.

To be able to meet our customers' high standards and requirements in terms of quality, the environment, and health and safety, we have been developing certified and integrated management systems within our Business Units for years. Our Group Directive on HSEQ specifies uniform standards and processes for the areas of Quality, Environmental and Occupational Safety management which apply to all our companies. This comprehensive and mandatory system enables the systematic, structured and safe implementation of our service processes both within our own company and at the customer's location. In doing so, we act proactively and use the latest software-assisted IT tools.

The performance of our services is subject to extremely stringent quality standards in order to support the customer's core processes as reliably and effectively as possible. In order to meet these requirements on a daily basis, it is essential to carry out rigorous planning, analysis and evaluation of all business processes as part of our quality management system in advance of any such action. We are familiar with the pertinent legal regulations that we must observe when carrying out our tasks.

Quality assurance encompasses, but is not limited to, internal audits, training courses and further training and qualification concepts for our employees, customer satisfaction analyses, framework agreements with subcontracting companies, purchasing guidelines and monitoring of subcontracting companies.

The effectiveness of our management systems is monitored regularly by a programme of both internal and external audits. This also creates legal security for our clients. Our Business Units are certified to the following standards among others:

- DIN EN ISO 9001 Quality Management
- DIN EN ISO 14001 Environmental Management
- DIN EN ISO 50001 Energy Management
- DIN ISO 45001 Occupational Health and Safety

3.3 Social interaction within the company and equal opportunities

We support the principles of respectful, fair and cooperative interaction with one another. All Apleona employees are given the same opportunities upon being hired and in the development of their professional careers within the company. Any type of discrimination is prohibited. No one may be discriminated against or disadvantaged on the basis of – in particular but not limited to – where they come from, their citizenship, gender, sexual orientation, religious or ethical beliefs, age, or handicap. Sexist comments, in particular misogynous comments, in speech, writing, images, or behaviour are not tolerated in our company, and will entail disciplinary and personal consequences. We expect all employees to contribute to a productive work environment by treating others with respect, tolerance, and consideration. Respect for the basic rights of employees is demanded from our suppliers, service providers and subcontractors in the supply and value-added chain by requiring that they sign our "Code of Conduct for Subcontractors and Suppliers".

3.4 Diversity management

With our corporate guiding principle "We champion individuality", we make it clear that we consider diversity to be a factor of success for our company. Based on our broad spectrum of services and tasks in building services, the skills, ideas, points of view, and characters of our employees are a good basis for implementing their individual strengths and for fulfilling particular tasks as optimally as possible for the success of the company.

During the hiring process, in addition to professional requirements, social and methodological aspects such as individual strengths, taking pleasure in work and enthusiasm for the particular task area, are also taken into consideration. Apleona is an international company and employees people from approx. 75 nations throughout the world.

3.5 Proportion of women in leadership positions

The proportion of women in leadership positions at Apleona (management levels 1-3) at the end of 2017 was 18.5%. Apleona GmbH's Supervisory Board has set itself the goal of increasing the proportion of women in leadership positions and of never again falling below the level achieved in 2017. The company has set itself an implementation deadline of December 2022. In our annual status reports on sustainability, we provide information about the number of women overall and about the proportion of women in leadership positions.

3.6 Fair employment conditions and the fight against child labour

We will not accept illegal employment or exploitation of people in any form, and actively oppose this. Illegal employment undermines the labour market and the social security system in our society. It jeopardizes legal employment and the creation of new workplaces. Child labour and the exploitation of employees are incompatible with our ethical values. By joining the UN Global Compact initiative, we have committed ourselves to work for the removal of all forms of forced labour and for the abolition of child labour. We pass on this commitment to our suppliers, subcontractors and service providers in the supply and value-added chain by requiring that they sign a "Code of Conduct for Subcontractors and Suppliers".

3.7 Sustainable human resources policy

We are constantly on the lookout for new ways to identify and reach out to new, talented employees, and to keep them in our company on a long-term basis in order to deal with the increasing shortage of skilled professionals as early as possible. The successful recruitment of employees is an essential success factor for our company's future in the context of our ambitious growth strategy. Likewise, however, retaining and further developing our existing team of employees is fundamental to being able to further develop and benefit from the many years of experience of our employees. For that reason, we offer our employees an environment and a culture in which they can implement their skills, abilities, and innovative ideas, and where they can develop further individually and feel 'at home'. Apleona is an attractive employer due to its wide range of real estate services. This is partly due to the individual development opportunities provided for employees and managers who are able to autonomously cooperate in diversified tasks and projects within Apleona. This also includes offering a wide range of internal and external further training opportunities to develop professional and personal skills. With approx. 300 trainees in 25 apprenticed professions, Apleona is an attractive training company for technical and commercial professions in Germany. The central Human Resources department manages all the related measures.

4. Environment

We are aware of the fact that the real estate industry has significant effects on the environment and on society during the entire life cycle. Increasing risks result from CO₂ emissions (climate change), scarcity of resources (construction materials, fossil energy sources, etc.), environmental impacts (soil, groundwater, air, etc.), and evolving social expectations for a sustainable building operation. In Germany, real estate accounted for approximately 34.5% of the total primary energy consumption in 2017.

Part of our corporate responsibility is to burden the environment as little as possible and to protect it as best we can. For this reason, we have integrated environmental protection into our service provision processes. Maintaining legal requirements and constantly improving our environmental service in the company and while serving our customers are the primary goals of our activities.

In accordance with individual customer requirements, our Business Units have certified environmental management systems pursuant to DIN ISO 14001 and possess the required professional qualifications and abilities to carry out environmentally-relevant activities. Implementation of these management systems leads to continual improvement of our environmental performance and of the environmental management systems through the agreed environmental programmes. This reduces the negative effects on the environment as a result.

Through the targeted training of our employees, awareness of the conservation of resources is raised and sensitivity to environmental protection issues is also strengthened. Regular internal and external audits monitor our environmental impact as we carry out our services.

We engage subcontractors who meet our environmental standards and those of our customers. The observance of standards is regularly monitored by the business partners we have commissioned. As part of taking on new orders in facility management, during the implementation phase with customers, all relevant environmental aspects are included and evaluated, and if necessary, measures are arranged and optimisations suggested. Observance of the relevant legal environmental standards is also demanded from our suppliers, service providers and subcontractors in the supply and value-added chain by requiring that they sign a “Code of Conduct for Subcontractors and Suppliers”.

5. Fair operating and business practices / Compliance Management System

5.1 Compliance Management System (CMS)

The goal of Apleona’s CMS is to use a systematic framework to achieve conduct that conforms to the rules and laws, and to minimise compliance risks. Consequently, at Apleona, we understand our CMS to be the synopsis of all group policies, specifications and all organisational measures which are implemented to ensure that the management, bodies, members of bodies and employees, as well as any third parties who work for and on behalf of Apleona, act in accordance with the applicable laws and regulations or prescribed procedures, or inversely, to ensure that violations of rules and breaches of our ethical commitment are avoided. At the same time, we want to permanently anchor responsible and proper conduct in the thinking and actions of all Apleona employees.

Our compliance system is organised into three levels of action: prevent, detect and respond.

Prevent

The prevention measures include the Compliance programme, the Compliance policy, which consists of the Code of Conduct and associated guidelines, and a comprehensive central training programme, consultancy and training for our employees.

Detect

Channels for reporting compliance violations such as the “Apleona Compliance Communication” whistle-blower system and professional and fair investigations are indispensable to the detection and complete clarification of any cases of misconduct. We resort, in this area, to a network of tried-and-tested independent consultants and auditors.

Respond

Clear responsiveness and consequences serve to sanction misconduct and address weaknesses. In particular, the ability to learn from our mistakes and therefore derived the further development of necessary measures, including in dialogue with the senior management and executives, are integral to Apleona’s success.

The active taking on of responsibility for compliance by all managers in the three levels of action mentioned above forms the overarching element of our compliance system, and this is also made clear in the introduction or foreword to the Code of Conduct as “tone from the top”.

In its design, the CMS is fundamentally based on the “IDW PS 980” CMS audit standard, published by the Institut der Wirtschaftsprüfer (Institute of Public Auditors in Germany). In line with this standard, Apleona’s CMS is divided into seven elements which form the basis for the company-specific design and implementation of the CMS:

- Compliance culture
- Compliance objectives
- Compliance organisation
- Compliance risks
- Compliance programme
- Compliance communication
- Compliance monitoring and improvement

Apleona's CMS is continuously improved and developed and continuously adapted to changing actual and regulatory circumstances and risks.

5.2 Compliance culture

By compliance culture, we understand more than the simple observance of laws and other obligatory requirements. In point of fact, we gear our conduct towards the benchmark of acting with integrity and decency. The key to understanding the word “culture” in this sense is the daily example set by the management and executives towards the achievement of this goal and its related values. They are expressly committed to these values, and also expect the same from all other employees of the Group. In addition to clear and goal-orientated communication, Apleona’s management, starting at the very top, attempts to lay out effective general conditions which allow and promote effective conduct that conforms to regulations. In this way, the compliance culture has grown up over the years to become a solid part of our company culture. Primary responsibility for compliance and a functioning Compliance Management System lies with the company management and is “a matter for the boss” in the individual companies. At the same time, the readiness of each individual employee to be actively involved is required in order to develop ongoing awareness of the meaning of compliance, and to recognise the acceptance of regulations and guidelines as mandatory.

5.3 Compliance objectives

Apleona’s compliance system pursues the goal of avoiding misconduct by taking preventive measures. To achieve this, we rely on guidelines, training, direct communication with employees, mandatory online and on-site training, supporting computer-assisted compliance tools and specific, practical compliance consulting for our employees by the Compliance department.

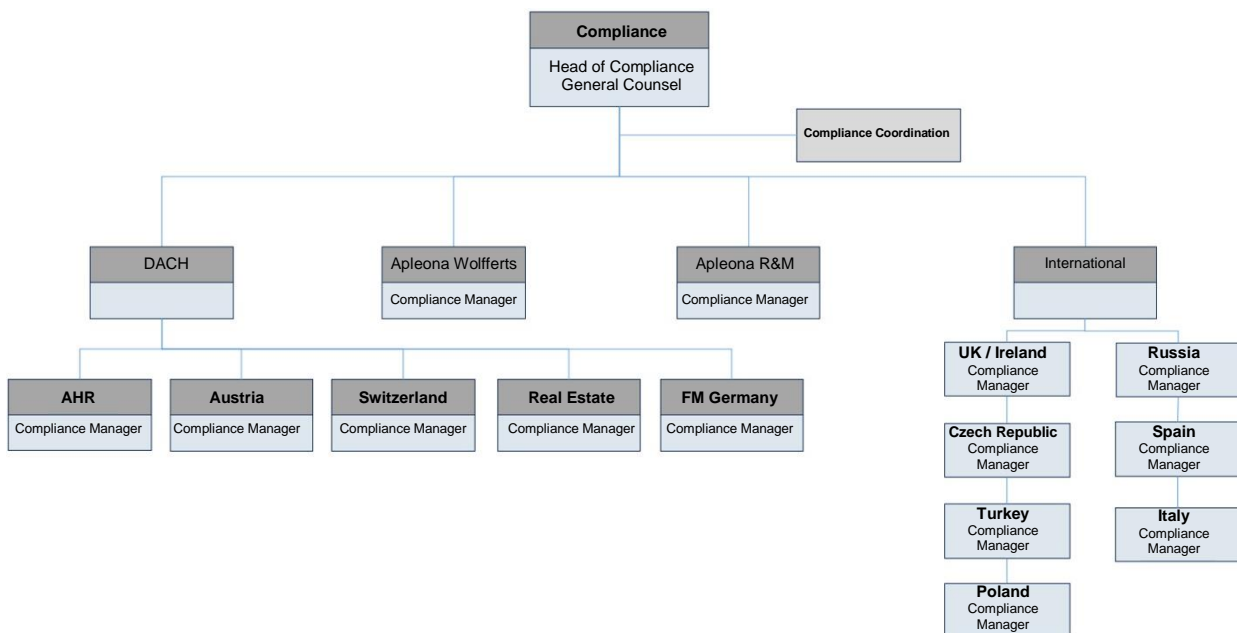
Alongside competition and antitrust law, the fight against corruption and bribery is a central component of our compliance system (see also section 5.5/5.8.) The systematic checking of business partners is another essential element of our compliance system and forms part of our preventive anti-corruption measures. In this way, already in the run-up to potential business relationships, we avoid compliance risks, as, where third parties act on our behalf, we can be exposed to risks and rendered liable for the misconduct of the third party.

We have also aligned our compliance objectives with the requirements of the Functional Specifications Document on Compliance Management in the Real Estate Sector.

- **Functional Specifications Document on Compliance Management in the Real Estate Sector**
https://www.icg-institut.de/wp-content/uploads/2020/07/Pflichtenheft_2018_low.pdf

5.4 Compliance organisation

The overall responsibility for compliance lies with all members of the senior management. Within each Group company, the issue of compliance is assigned to a member of the senior management in accordance with the allocation of duties. In organisational terms, responsibility for the Compliance department is assigned to the CEO at the Group parent company. The Compliance department is a subdivision of the Legal & Compliance department which takes care of compliance tasks. It consists of the Head of Compliance and the department's employees entrusted with compliance tasks. The Head of Compliance reports to the General Counsel which, in turn, reports directly to the CEO as well as to the Supervisory Board. In performing their task of ensuring compliance with legal, regulatory and internal requirements, maintenance of our standards, and implementation of our Compliance Management System on site, the CEO and the Legal & Compliance department are supported by local Compliance officers. Compliance officers are part of the Group's Compliance organisation pursuant to section 6.2 of the Apleona Code of Conduct, and are appointed by the management of the operative Group Units. The appointment of the respective Compliance officers and the definition of their field of duties is documented in writing.



Employees can view the latest organisation chart and the standard formula for appointing a Compliance officer on the internal document management system, RoXtra:

<https://dms-qm.apleona.net/Roxtra/doc/showfile.aspx?FileID=16349>

<https://dms-qm.apleona.net/Roxtra/doc/showfile.aspx?FileID=9780>

5.5 Compliance risks

Compliance concerns the entire company. We systematically pursue the goal of minimising compliance risks. The compliance risk analysis focuses in particular on bribery and corruption risks as well as competition and antitrust law, anti-money laundering and sanctions. Every year, we analyse and evaluate all our Business Units and relevant corporate departments in relation to such risks.

The risk analysis (which includes the key aspects of compliance) is conducted by the Risk Management & Assurance department.

In 2020, the annual systematic risk analysis was comprehensively revised by the Compliance department and a compliance risk catalogue applying specifically to Apleona was drawn up.

This is based both on generic risks and on risks identified during the course of case clarifications, audit activities and reports and, for example, on feedback from training events.

To start with, the gross risk is determined, together with the Business Unit, in terms of impact (amount of damage) and probability of occurrence in accordance with Apleona's general risk management system. The gross compliance risk refers to the probability of occurrence of a compliance risk without taking risk reducing measures into consideration. In a second step, the net risk is determined, taking into account risk mitigation measures and their effectiveness, such as ICS controls, guidelines, training or process instructions. In a third step, depending on the level of the net risk (e.g. measures are considered insufficient), suggestions for further risk reducing measures (mitigation measures) are made by the Compliance department in collaboration with other departments, such as specific training, or individual recommendations which are then to be implemented by the Business Unit. The implementation of these measures are then checked by means of spot checks during the course of audit reviews.

The results of the compliance risk analysis continue to be used as the basis for our risk management system and are taken up for the further development of our risk control matrix.

5.6 Compliance programme

Our compliance programme finds expression, for instance, in our core compliance documents (Code of Conduct, Group Directive on Integrity, Group Directive on Third Parties, Group Directive on Competition) which have been adopted by the management and are available in 16 different languages for internal use throughout the Group. They can be accessed on the intranet via RoXtra, our document management system. They are mandatory for all employees worldwide.

Code of Conduct

The Code of Conduct explains the general principles behind our actions, and also provides the basis for all our activities concerning respect for human rights. The Code of Conduct defines principles for acting with integrity both towards other employees and towards external persons and organisations, and is directed at all managers and employees throughout the Group – irrespective of where they work and what activities they perform. Our managers and employees are obligated to adhere to the rules and principles and to confirm receipt and acknowledgement of them in writing. The associated Group Directives contain concrete instructions for action on the central topics of integrity, competition and dealings with third parties.

Group Directive on Integrity

The Group Directive on Integrity deals with set-ups that are often associated with a risk of bribery respectively corruption in business life. This includes preferential treatment payments, invitations and other gifts or treats, dealing with public officials as well as donations and sponsoring activities. The Group Directive on Integrity also provides employees with guidance on how to identify and avoid potential conflicts of interests and what reporting obligations employees must comply with.

The Group Directive on Integrity is supplemented by the Group Procedure on Conflicts of Interest during the provision of consulting, planning or administrative services. The Group Procedure is used to set out clear and appropriate rules for dealing with conflicts of interest/situations where one group company provides a third party with consulting, planning or administrative services and at the same time either this company or another group company would also like to offer this third party further services based on exactly these consulting, planning or administrative services.

Group Directive on Third Parties

The Group Directive on Third Parties provides rules for cooperating with business partners such as suppliers, subcontractors, distribution agents and joint venture partners. The Group Directive on Third Parties provides group-wide standards on how business partners are to be screened before being commissioned. The Group Directive on Third Parties is also supplemented by the Group Procedure on Sanction List Checks which sets out the requirements for screening creditors and debtors.

Group Directive on Competition

The Group Directive on Competition offers guidelines for proper conduct in competition, for example, when cooperation is permissible and what should be observed in association work and at association and industry meetings, trade fairs and similar events.

Specific compliance aspects such as the subject of anti-money laundering are addressed via the separate Group Procedure on the Prevention of Money Laundering and Terrorist Financing. At the same time, this Group Procedure serves as a guideline for employees. Particularly relevant topics such as changes to the Money Laundering Act are conveyed through training measures in a target group-specific approach.

Employees can download the above-mentioned documents from the internal document management system, RoXtra:

- **Code of Conduct**
<https://dms-qm.apleona.net/Roxtra/doc/showfile.aspx?FileID=4416>
- **Group Directive on Integrity**
<https://dms-qm.apleona.net/Roxtra/doc/showfile.aspx?FileID=4418>
- **Group Directive on Third Parties**
<https://dms-qm.apleona.net/Roxtra/doc/showfile.aspx?FileID=4424>
- **Group Directive on Competition**
<https://dms-qm.apleona.net/Roxtra/doc/showfile.aspx?FileID=4426>
- **Group Procedure on Conflicts of Interest during the provision of Consulting, Planning or Administrative Services**
<https://dms-qm.apleona.net/Roxtra/doc/showfile.aspx?FileID=8573>
- **Group Procedure on the Prevention of Money Laundering and Terrorist Financing**
<https://dms-qm.apleona.net/Roxtra/doc/showfile.aspx?FileID=4609>

Managers have a special role to play in implementing our Code of Conduct and compliance directives and must act as role models. Where specialists and managerial staff receive variable remuneration elements, these are often also linked to goal achievement elements from the areas of compliance and HSEQ.

The integration of mandatory integrity tests in the new employee recruitment and promotion process also forms part of our compliance programme. Checks are carried out by means of an "Applicant Compliance Checklist" and the "Compliance Personnel Questionnaire". In addition to this, there is also the Group Procedure on Compliance Checks performed during the hiring, transfer and promotion process. These instructions describe the procedure to follow when carrying out different compliance checks which can be risk-based if the advertised position or role is for an executive or managerial position, a role in purchasing or sales, or a role involving direct contact with the authorities. The checks concern new employees, internal promotions or first-time transfers to exposed functions.

Employees can download the above-mentioned documents from the internal document management system, RoXtra:

- **Applicant Compliance Checklist**
The link will be updated shortly.
- **Compliance Personnel Questionnaire**
The link will be updated shortly.
- **Group Procedure on Compliance Checks performed during the Hiring, Transfer and Promotion Process**
The link will be updated shortly.

The aim of our international network of compliance officers is to ensure that employees in the Business Units have a local compliance contact person. Compliance officers are trained employees, who, in addition to their main function in the company, also support their colleagues in compliance and integrity matters, and thus reinforce the presence and visibility of the compliance issue in their respective places of work. Compliance officers regularly exchange information with the Legal & Compliance department and bring in experiences and challenges from the individual locations to further develop the compliance programme.

5.6.1 Ethical conduct

We expect our employees to behave ethically in all their business activities and in all situations connected to these activities. Business conduct is ethical if it complies with the general principles of integrity and decency, and if the people we deal with feel that this conduct is right. Ethical conduct also means understanding and comply with the spirit of our guidelines and refraining from making any attempts to get round them. All persons dealing with external partners on behalf of our company, bear responsibility for exemplary ethical conduct in their role as company representatives. This applies in particular to the senior management.

5.6.2 Combatting corruption and money laundering

Bribery and corruption among our employees is prohibited. Our employees may not promise or grant money or other economic advantages to customers, suppliers or other business partners, either directly or indirectly, in order to influence their decisions or to obtain undue benefits. This principle also applies inversely: nobody acting on behalf of, or for Apleona, may allow themselves to be corrupted by accepting unfair economic advantages from business partners. We also consider small payments to secure or speed up a routine official action ("preferential treatment payments") to be bribery. Our employees are prohibited from doing this.

5.6.3 Fair competition

We are committed to ensuring fair competition. Our customers choose us due to the high quality of our work at competitive prices. We refuse to be party to any agreements that lead to restrictions on competition.

5.6.4 Data protection / Handling confidential data

Handling confidential data requires care and good judgement by the persons who receive this information while performing their work activities. This information may not be misused for personal purposes or transferred to a third party without the agreement and knowledge of the sender. Personal data of all kinds must be carefully protected against unauthorised access and misuse by unauthorised persons, both outside and inside the company. Our customers also expect confidential, careful and legal use of data when exchanging sensitive information.

Our Group Directive on Data Protection regulates the handling of personal data based on the legal provisions of the Federal Data Protection Act (BDSG), the EU General Data Protection Regulation (GDPR) and other regulations regarding data protection. Training measures, including in the form of mandatory online training courses, sensitize our employees to this issue and help ensure orderly conduct in daily practice.

5.7 Compliance communication

The necessary knowledge of the content of the Code of Conduct and associated Group Directives, supplementary compliance documents and content, and correct conduct in critical situations is provided through training measures and in informational lectures. In 2018, a new compliance training plan was implemented and is subject to continuous further development. We define our integrated training programme based on an annual planning cycle. This includes the aspects of integrity (including the prevention of corruption, competition and antitrust law, HR compliance and anti-money laundering). Depending on the risk and target group, we offer on-site or virtual learning methods such as online or web-based training.

A target group-oriented online training programme is available for all employees with email access. It is made up of two different modules. In addition to a basic training course – Online Training in Compliance Regulations – the training programme also includes an online anti-corruption training course for managers, employees in procurement, sales and other sensitive areas (ABC training: Anti-Bribery and -Corruption training).

The relevant online training courses are automatically assigned to employees, depending on the procurement role and function, who have email access at their workstation. In this way, every employee receives training which is exactly right and relevant to their role. This takes place when an employee is hired or promoted, or changes to a new job which has an increased risk, so that personnel changes over time are also taken into account. The online training offer is enhanced by on-site training measures conducted by central or local trainers so that employees, for whom online learning is not an option, for technical or organisational reasons, can also be trained.

In addition, a Group Directives Day is organised once a year for all managers in German and English. The aim of this event is to give managers and employees, selected from different departments an information update on the Group Directives, Group Procedures and relevant processes from the respective areas (such as Legal & Compliance, Risk Management & Assurance, etc.), particularly in terms of:

- major changes or updates
- perhaps not new, but nevertheless, important content in the form of refresher training and
- other important information which is to be communicated by the areas to the managers.

Up to 215 managers from across the Group take part in this event.

A refresher course on compliance rules (online training) was developed in 2020 and will be rolled out in 2021. The mandatory refresher course must then be completed annually.

We also provide qualification measures specific to the target group in order to support our Compliance and Legal department employees in legal and regulatory changes. Administration of online training and the recording and documentation of on-site training is carried out by the Human Resources department.

With all these training measures, we support the long-term anchoring of upright compliant behaviour in the company and provide our employees with assistance in dealing with concrete situations in practice, thus also significantly contributing to the fight against corruption.

Part of the CSM is also to ensure regular exchanges between the Compliance Organisation and the Group management, as well as with the responsible management of the Group companies. The General Counsel reports directly to the CEO of Apleona GmbH and to the Supervisory Board on a quarterly basis. At the same time, the Apleona Compliance Board meets once a quarter under the leadership of the Compliance department.

It is made up of selected department heads from Legal & Compliance, Risk Management & Assurance and Human Resources. The Compliance Board deals with compliance cases, the implementation status of compliance-related topics (such as training courses/risk assessments and their further development) and the status of the whistle-blower system and other aspects, as necessary. Apleona GmbH's CEO regularly takes part in Compliance Board meetings. The compliance aspect is also regularly discussed at management meetings and Supervisory Board meetings.

In addition, Apleona maintains a whistle-blower system with Apleona Compliance Communications (which can also be used anonymously) that accepts reports by email and functions as an additional (anonymous) communication channel to the Compliance Organisation. This enables all employees, our customers or suppliers to report any alleged or actual breaches of Apleona's directives or to ask compliance-related questions.

The tool is available as follows:

➤ **Internet**

<https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=2BT20&language=eng>

5.8 Compliance monitoring and improvement

A complete and structured compliance risk analysis is carried out annually at Apleona, during which, risk-specific tasks from the risk management process are distributed across the various areas of responsibility. To this end, the Risk Management & Assurance department asks the relevant corporate departments (including Legal & Compliance) and Business Units to identify and assess all significant risks and to indicate the control measures already initiated.

In 2017, in addition to the annual systematic risk analysis conducted by the Risk Management & Assurance department, an interview-based risk analysis was also carried out by the Compliance department, leading to the adaptation of the existing compliance rules and the training programme. In 2018, in addition to the annual risk analysis conducted by the Risk Management & Assurance department, a risk analysis concerning the Money Laundering Act was also carried out by Compliance.

In 2020, the annual systematic risk analysis was comprehensively revised by the Compliance department (for more details, see section 5.5). From 2021, the Risk Management & Assurance and Compliance departments will jointly carry out the further developed, in-depth and systematic annual risk analysis to ensure its seamless integration into our risk management and internal control system.

Further details about our risk management process are provided in the Group Directive on Risk Management.

Essential compliance core processes are also reviewed by ICS officers during the year in accordance with a risk-control matrix that is constantly updated. The updated control matrix serves as an additional random check of compliance-relevant issues.

The results of these audits as well as the knowledge that comes, for example, from training events, are used for the evaluation and possibly also for the further development of the CMS overall, as well as for the compliance rules specifically. Risk surveys conducted by the Risk Management & Assurance and Compliance departments, along with other departments, are also used for continued development.

Employees can access the Group Directive on Risk Management via the in-house document management system, RoXtra:

- **Group Directive on Risk Management**
<https://dms-qm.apleona.net/Roxtra/doc/showfile.aspx?FileID=9344>

5.9 Compliance in the supply and value-added chains

In order to provide our services, we rely on cooperation with business partners (service providers, suppliers, sub-contractors). As the compliant behaviour of our business partners is an indispensable prerequisite for us, we review these partners in a risk-based process before entering into a business relationship with them. Defined order volume limits or the allocation to specific third party categories which leads to third-party checks (TP Check) provide a benchmark for these targeted checks. Apleona's Business Units are supported in these integrity checks by our Compliance department during the risk assessment. The entire process and its documentation is carried out with the aid of an access-protected IT tool (TP Check). Applicable sanctions lists must be screened for all creditors and debtors prior to entering into transactions using the web-based tool TCM (Transaction Controlling & Monitoring). The TCM web application is available on the Apleona intranet. In addition, an automated initial check of all creditors and debtors was carried out throughout the Group when the Group Procedure on Sanction List Checks came into force in September 2019. A total of 180,000 debtors and creditors were checked.

Employees can download the digital tools for screening business partners via the in-house links:

- **TCM can be accessed at**
http://dc000pca090:9100/smaragd.tcm.webclient/check?locale=en_EN
- **TP Check can be accessed at**
<http://dc000pca090.comp.ds:9400/>
(Please note: Java Runtime, Environment 8, is required)

In addition to the above-mentioned checks of compliance aspects and our expectation of conduct that always complies with the law, we also require our business partners to comply with minimum standards in the areas of ecology and society. We have made our expectations publicly available in a transparent manner on our website in both German and English. The Code of Conduct for Subcontractors and Suppliers describes, among other things, the obligation to observe the ten global principles of the UN Global Compact Initiative and to comply with the minimum standards. This includes, in particular, respect for human rights (prohibition on child and forced labour), compliance with the minimum standards of working conditions, the fight against corruption and illegal employment, and the best possible environmental protection. The obligations must also be passed on to subcontractors in the same way. In Article 20 of our Terms and Conditions of Purchase, it is specified that this Code of Conduct is a fundamental part of our supplier contracts.

We have made all information for service providers, suppliers and subcontractors available in the internet for downloading on our website:

German: <https://www.apleona.com/ueber-apleona/dienstleister-lieferanten-und-nachunternehmer/>

English: <https://www.apleona.com/en/about-apleona/information-for-service-providers-suppliers-and-subcontractors/>

6. Consumer concerns

6.1 Customer satisfaction

Our activities are centered around our customers' satisfaction. We remain in close contact with our customers at all times. Particularly through our presence on-site in real estate, at technical facilities or close to production processes, we can directly and quickly identify customer needs, and work with our customers to develop effective solutions that can be implemented.

We service our large customers through specialised key account managers who are very familiar with our customers' specific technical, commercial and other requirements. Here too, the frequently complex requirements are individually coordinated with customers and implemented efficiently.

Our Business Units conduct customer satisfaction assessments at regular intervals. These allow us to improve our processes and to become familiar with our customers' new requirements at an early stage.

6.2 Sustainability of our services

Through our detailed and interdisciplinary knowledge and professional service offers, we can optimally support our customers in all real estate life-cycle phases in the sustainable management and operation of their real estate and facilities. We use our own accredited staff to provide a broad range of consulting and implementation services to optimise sustainability in the following areas:

- Consulting, inventory, analysis and evaluation
- Operation, monitoring and documentation
- Procurement and financing and
- Innovations.

An overview of our individual sustainability services can be found on our website:

- German: <https://www.apleona.com/ueber-apleona/nachhaltige-dienstleistungen/>
- English: <https://www.apleona.com/en/about-apleona/sustainable-services/>

For professional support in design, implementation and operation, we have drawn together our expertise into a specialised Centre of Competence (CoC) in the area of energy and sustainability so that customers and our own employees can optimally benefit from our many years of experience in successfully implemented projects. Our CoC publishes a newsletter to inform our customers and employees, for example, about current changes in the law concerning these subjects.

We see ourselves as a customer-oriented consultant, sparring partner and reliable service provider for our customers looking to convert their real estate or technical facilities into a sustainable management model and to create added value. As a result, our services support the sustainability of real estate with a positive effect for the environment and society and by forging a path to a virtually carbon-neutral stock of real estate in Europe by 2050.

6.3 Outsourcing

In a globalised competitive environment, our customers must focus on their core businesses in order to be successful in business on a long-term basis. Outsourcing secondary processes to a specialised service provider in real estate, facilities and production processes can be an important strategic step. With years of experience, Apleona is a reliable outsourcing partner for customers from various industries. In addition to taking over secondary processes, we integrate existing employees sustainably into our competent teams, if needed.

That way, professional expertise is retained and further developed through the rational mixing of our teams. On the one hand, this creates attractive prospects for new colleagues and, on the other, it noticeably relieves our customers' budgets. Thus, a win-win situation is created both for our customers and for us.

Of course, one of the things that is very successful for us in any outsourcing process is that we integrate corporate co-determination into the project as partners at a very early stage. In addition, we also pay attention to the merging of differing corporate cultures, because employees only become a valuable component of business success if they are convinced.

6.4 Transparency

Publishing our Group Policy on Corporate Social Responsibility and our annual Status Report on Sustainability on our website in a concise and comprehensible way is also intended to enable our business partners and other external stakeholders and interest groups to find out about the activities we undertake in assuming our social responsibility.

- German: <http://www.apleona.com/ueber-apleona/verantwortung/>
- English: <http://www.apleona.com/en/about-apleona/responsibility/>

6.5 Business continuity plan

With the start of the Covid-19 pandemic in Europe in March 2020, it became clear that keeping the company in operation under the conditions of the infection control measures promptly decreed by the government was going to pose organisational challenges. Due to these experiences, Apleona reviewed its emergency plans in order to counter the new risks in the best possible way and to be able to maintain our performance with regard to our customers at all times. The following measures to protect the company are provided here simply in the form of thematic groups; they are described in more detail in our annual Status Report on Sustainability:

- Emergency organisation
- Emergency communication
- Health protecting for employees
- Securing critical business processes

The business continuity plans of all Apleona units are reviewed annually under the responsibility of the respective management, and adapted if necessary.

7. Integration and community development

7.1 Attractive employer

Apleona makes a major contribution to society as an attractive employer through its presence in approx. 30 countries with over 20,000 employees. Thanks to its decentralised structure, Apleona provides regional employment and thus contributes to strengthening the regional economy and to positive regional development. By awarding services to external companies and purchasing local products, the regional economy is strengthened further.

7.2 Commitment to real estate associations, bodies and universities

We get involved in various professional associations, bodies and universities to ensure professionalization, standardization, the further development of knowledge and the necessary sharing of experience. This makes it possible for us to join real estate industry discussions with expertise in the subject matter, and to give our well-founded professional opinion.

Working in specialised professional groups or giving professional lectures is an important contribution to the further development of the industry, and to the transfer of knowledge to junior employees. The following are among the institutions in which we are active or with which we collaborate (as of December 2020):

- German Property Federation (ZIA)
- German Facility Management Association (GEFMA)
- International Facility Management Association (IFMA)
- Royal Institution of Chartered Surveyors (RICS)
- Urban Land Institute (ULI)
- European Association for Investors in Non-Listed Real Estate Vehicles (INREV)
- Institut für Corporate Governance in der deutschen Immobilienwirtschaft e.V. (ICG)
- UN Global Compact (UNGC)
- Deutsche Unternehmensinitiative Energieeffizienz e.V. (DENEFF)
- Verband für Wärmelieferung e.V. (VfW)
- Forum Contracting e.V.
- Fachvereinigung Krankenhaustechnik e.V. (FKT)
- Club der Gesundheitswirtschaft (cdgw)
- Gesamtverband Gebäudetechnik e.V. (VGT)
- Bundesindustrieverband Technische Gebäudeausrüstung e.V. (BTGA)
- Güte- und Überwachungsgemeinschaft Technische Gebäudeausrüstung e.V. (GTGA)
- Hauptverband der Deutschen Bauindustrie e.V., Bundesfachabteilung Ausbau und Trockenbau

We have published an updated list on our website:

- German: <http://www.apleona.com/ueber-apeleona/verantwortung/>
- English: <http://www.apleona.com/en/about-apeleona/responsibility/>

7.3 Social commitment

Our employees are very enthusiastic about making a social contribution to their local communities for good purposes or for society as a whole. This includes, for example, charitable volunteer work or sponsorship through donations and/or participation in sporting events. Social commitment through donations, sponsorship, contributions in kind or of staff is based on the various local needs and individual capabilities and goals of our companies' locations, which initiate and implement them at their own initiative.

We have actively participated in the "Practical guidelines for effective social/corporate conduct in the German real estate industry," which, among other things, also provides practical examples for involvement by companies working in the real estate industry. As part of our work, we have conducted a systematic consumer survey on social commitment. The practical guidelines can be downloaded at the following link (only in German):

https://www.zia-deutschland.de/fileadmin/Redaktion/Meta_Service/PDF/Verantwortung_uebernehmen_Praxisleitfaden_CSR.pdf

8. Amendment history

Date	Version	Revised content
26/01/2018	1	Initial creation
01/03/2021	2	Full revision

9. Appendix: Glossary

German Term	English term	Meaning
Business Unit (BU)	Business Unit (BU)	Reporting unit belonging to the Apleona GmbH that has no legal personality. In organisational terms, the Business Unit is directly below the Executive Board and is responsible for the operational management of the Group companies that belong to it. Each BU is managed by a Chief Executive Officer (BU CEO) and a Finance Director (BU FD) who report directly to the Executive Board. Additional functions can be defined if needed.
CMS	CMS	Abbreviation for Compliance Management System
CoC	CoC	Abbreviation for Centre of Competence
COP	COP	Abbreviation for Communication on Progress; an annual report from the company on its activities and progress in support of the 10 principles of the UN Global Compact (UNGC)
Corporate Governance	Corporate Governance	The concept of Corporate Governance (i) includes the entire system of managing and monitoring a company, including its organisation, business principles and guidelines. It also includes guidelines, procedures and other provisions (including circulars, forms, process descriptions and memos) and internal and external control and monitoring mechanisms; (ii) defines and refers to the corresponding support function.
DIN	DIN	Abbreviation for Deutsches Institut für Normung (German Standards Institute).
Führungskreis 1-3	Management level 1-3	Management hierarchy in management
GEFMA	GEFMA	Abbreviation for German Facility Management Association
General Counsel	General Counsel	Head of the Legal & Compliance department
Gesellschaftliche Verantwortung	Corporate Social Responsibility (CSR)	Companies have a social responsibility which is organised into various thematic groups. These groups are often categorised into the three sustainability aspects of economics, ecology and social culture.
Governance	Governance	Governance describes the uniform, group-wide framework and structured rules for the internal organisation of a company.
HSEQ	HSEQ	Abbreviation for Health, Safety, Environment, Quality
ICG	ICG	Abbreviation for Institut für Corporate Governance in der deutschen Immobilienwirtschaft e.V.
IKS	ICS	Abbreviation for Internal Control System.
ISO	ISO	Abbreviation for International Organisation for Standardisation

German Term	English Term	Meaning
Konzern	Group	The entirety of all Group companies, including Apleona Group GmbH, as the highest legal entity.
Konzernanweisung	Group Procedure	Document specifying group-wide valid and specific rules, roles and responsibilities.
Konzerngrundsätze	Group Policy	A document that prescribes the conduct and activities of the company in a short, abstract form.
Konzernrichtlinie	Group Directive	Document prescribing valid, abstract rules, roles and responsibilities for all employees throughout the Group.
Leitsatz	Culture	A short, concise description of values and the corporate culture for presentation inside the company and outside it
Management Board	Management Board	Advisory body consisting of the members of the Executive Board and other Business Unit directors appointed by the Group CEO in coordination with the CFO and the COO of the board
Mitarbeitende	Employees	Persons with an employment relationship or an executive body position in (at least) one group company at Apleona
RICS	RICS	Abbreviation for Royal Institution of Chartered Surveyors
Slogan	Tagline	Corporate philosophy for internal and external promotion, condensed into one sentence
TP-Check	TP Check	Abbreviation for third-party check
UNGC	UNGC	Abbreviation for United Nations Global Compact. This is the world's largest and most important responsible business management initiative.
Werteorientierte Unternehmensführung	Corporate Sustainability Leadership	Recognition of a company's social responsibility by its management along with the implementation and installation of appropriate measures
ZIA	ZIA	Abbreviation for Zentraler Immobilien Ausschuss e.V. (Englisch: German Property Federation)