



# Code of conduct

REIWAG FACILITY SERVICES

## Foreword by the Management

Dear employees,

REIWAG Facility Services GmbH considers it as its corporate mission to create a sustainable value for customers, employees and society. The common basis of this claim is our cooperate culture. It is characterized by customer and service orientation, mutual respect and commitment to the people as well as striving for operational success. Our business conduct is characterized by competence, accuracy, trustworthiness and integrity.

REIWAG Facility Services GmbH has written for this reason behavioral principles that should serve as a guideline for building confidence in the company policy.

In the Code of Conduct, you will find our basic principles listed. It is the basis for a morally, ethically and legally impeccable behavior of our employees in the REIWAG Facility Services Group.

As Managing Directors, we will do everything necessary to ensure that the conditions laid down in these Code of Conduct standards are implemented and practiced continuously in all parts of the Group. We want and will lead by example and expect all employees to follow this path with us.

This code of conduct does not claim to specify the correct behavior of each individual situation and therefore we trust each employee to make thoughtful and well-considered decisions.

The management of REIWAG Facility Services Group



KR Viktor Wagner



Thomas Dittrich

Each individual takes responsibility.

## INHALTSVERZEICHNIS

Foreword by the Management.....	1
1. INTRODUCTION.....	3
2. SCOPE.....	3
3. LEGAL COMPLIANCE.....	3
4. BEHAVIOUR TOWARDS CUSTOMERS AND BUSINESS PARTNERS .....	4
5. BEHAVIOUR TOWARDS EMPLOYEES .....	4
6. CORRECT BEHAVIOUR TOWARDS COMPETITORS.....	4
7. CONFIDENTIALITY .....	4
8. PROTECTION OF COMPANY PROPERTY.....	5
9. AVOIDING CONFLICT OF INTEREST.....	5
10. BRIBERY AND CORRUPTION .....	5
11. GIFTS AND INVITATION .....	6
12. HUMAN RIGHTS, LABOR AND SOCIAL STANDARDS .....	6
13. ENVIRONMENTAL PROTECTION AND SAFETY .....	7
14. PRIVACY POLICY.....	7
15. COMPLIANCE .....	7
16. CONTACT .....	8
17. CONCLUSION .....	8

## 1. INTRODUCTION

Our Code of Conduct is based on our daily activities. It is not pulled out of thin air but based on the following principles:

- Our customers are the main focus of all our activities as well as their goals, desires and needs. We want to satisfy our customers, and strive to establish long-term partnerships to preserve the value of their property.
- Performance dictates our action therefore we want performance to pay off. This principle achieves high customer and employee satisfaction and secures sustainable jobs.
- The respectful interaction with each other is the basis of a good cooperation. Respect will be met with our customers, employees, business partners as well as with our competitors. The encounter of larger diversity from different nations and sectors regarding talent, knowledge, language skills and personalities makes our company so successful.
- Flexibility ensures our innovation. We put existing approaches to question, respond to ideas of our customers and employees, and as a result we develop new solutions which benefits us all.
- Our actions are characterized by reliability, fairness, transparency and honesty.

## 2. SCOPE

Our Code of Conduct applies to all employees of the REIWAG Facility Service Group in Austria and abroad, regardless of whether the company is 100% subsidiary, a joint venture, a majority or a minority shareholder. Of course, individuals and companies acting on behalf of and / or in the name of REIWAG are also bound by the terms of this Code of Conduct.

Unless otherwise stated, in this Code of Conduct ("we") is always referred as REIWAG Facility Services Group and all its employees. As well as in this code of conduct, REIWAG strives in all its internal and external documents for equal treatment for men and women. However, for the interest of readability individual-related appellations are listed in the masculine form and are related to women and men in the same way.

## 3. LEGAL COMPLIANCE

The REIWAG Facility Services Group respects the laws, irrespective of whether these are supranational or local rules and demands the same of its employees and clients. Economic considerations do not justify in any case the breach of law or the noncompliance with the code of conduct.

## **4. BEHAVIOUR TOWARDS CUSTOMERS AND BUSINESS PARTNERS**

At REIWAG we focus on the needs of our customer and spare no effort to provide best possible services in the interest of our customers.

We expect all employees to treat customers and business partners with respect and meet them in a competent, friendly and trustworthy manner.

In return we expect the same respectful treatment in the interaction with our own employees and do not tolerate discrimination, harassment or threat.

## **5. BEHAVIOUR TOWARDS EMPLOYEES**

We at REIWAG share a common goal and that is why we sustain fair and cooperate interaction with one another. This applies to every employee, regardless of the hierarchical level.

At REIWAG we respect all people regardless of their age and sex, constitution, nationality, ethnicity, religion and sexual orientation. We respect their dignity, their rights and their privacy and meet them with esteem.

We do not tolerate any form of discrimination, or any hidden discussions about shortcomings or misconduct by colleagues and we are strongly opposed to any aspects of bullying, sexual harassment and violence.

## **6. CORRECT BEHAVIOUR TOWARDS COMPETITORS**

We treat our competitors on the market with fairness; we do not spread any negative headlines and strive to work cooperatively with other service providers. We are aware that we can achieve more when we work together and support each other. The best approaches for this are cooperation contracts.

## **7. CONFIDENTIALITY**

All confidential information whether internal or external data must be protected.

Our employees may disclose information only in the context of their task. It is forbidden to use confidential information for the purpose of enrichment or in any other illegal manner, directly or indirectly by involving a third party.

Confidentiality regarding internal affairs of REIWAG Facility Services Group, must be kept maintained, even after termination of employment if information has not been made public.

Naturally, the confidentiality obligation applies to all information our employees may have received or inevitably experienced in the course of their activities at our customers.

## **8. PROTECTION OF COMPANY PROPERTY**

Each and every employee must handle company and client property with care and protect it against loss, damage, theft, misuse, and unauthorized use.

Also intangible assets such as in-house knowledge, intellectual property and copyrighted work are part of the company property.

Company computers and other equipment are only for operational purposes and are not intended for personal use. Without the explicit consent of the competent department company property must not be used for private purposes or removed from the company premises.

## **9. AVOIDING CONFLICT OF INTEREST**

Our all-out effort is a key factor for the success of our Group. The employees of REIWAG must ensure that their own interests do not conflict with their obligations to the company nor towards REIWAG's customers.

Potential conflicts of interest must be reported immediately to the superior in order to find a common solution.

The taking up of a secondary employment or of volunteer work must be submitted in written form to the management board. If an employee may engage in a secondary employment for remuneration, a written permission must be obtained from the management. Permission for such activity can be denied if it leads to a decrease in work performance, contradicts the employee's duties, or if there is a threat of a potential conflict of interests.

## **10. BRIBERY AND CORRUPTION**

We treat all our customers and business partners fairly and expect the same from them! Our business relationships are based solely on objective criteria including quality, reliability, competitive prices as well as the compliance with social and environmental standards and the essential principles of proper corporate management and control.

The REIWAG Facility Services Group expressly prohibits its employees from engaging any form of bribery.

For these reasons employees dealing with suppliers, customers, other business partners, public officials or job-seekers must not demand or accept personal advantages such as payments, gifts or other benefits of value, by which the impression of (tried) influencing of business decisions can originate.

Likewise, employees of REIWAG must not promise or grant employees of other companies or public officials any personal benefit with the intent to obtain a contract, secure a business or to obtain unjust advantages towards REIWAG.

All employees are obliged to inform their supervisor, if a business partner or an official is requesting or offering a personal advantage.

Furthermore, payment of bribe to business partners or public officials in order to simplify or accelerate decisions, administrative procedures or official acts is strictly forbidden.

## **11. GIFTS AND INVITATION**

Offering, granting, demanding or accepting cash donations or anything related to cash equivalent is strictly prohibited. Other gifts or invitations may only be granted or accepted if they comply with the general business culture as a gesture of courtesy and excludes influencing any business decisions or any official acts.

If it is not possible to reject inappropriate gifts tactfully, they can be accepted. In such cases, the supervisor has to be informed, who will decide on how to proceed (e.g. donation to a charitable organization).

In most countries, gifts and invitations of a certain value are considered to be taxable non-cash benefits. Each person who is granted or is accepting gifts and invitations must ensure that the applicable tax regulations are strictly adhered.

## **12. HUMAN RIGHTS, LABOR AND SOCIAL STANDARDS**

REIWAG ensures that all employees are acting in accordance with the internationally recognized human rights and the applicable labor and social standards act.

We plead for the elimination of all forms of child and forced labor, the principle of non-discrimination, recognition of freedom of association, collective bargaining and social partnership, fair pay and benefits according to local market conditions, reasonable working hours and paid holidays as well as proportionality in disciplinary action and safety measures.

REIWAG is committed to equal opportunities in the labor market and complies with all applicable laws to prohibit discrimination in particular on the basis of age, origins, color, gender, sexual orientation, religion or disability.

These principles apply to all personnel actions such as recruitment, hiring, training, job changes, promotions, compensation, benefits, discipline and termination. In addition, sexual harassment and other harassment in the workplace are strictly prohibited.

### **13. ENVIRONMENTAL PROTECTION AND SAFETY**

The observance of all laws for the protection of person and environment is one of our essential principles. We give priority to security always. Economic considerations never lead us to compromise on safety, environmental and health protection.

REIWAG is committed to the cautious use of natural resources and actively supports measures to protect our environment. All our employees have the duty to deal with the natural resources responsibly and protect the environment in their field of work.

Each employee is personally responsible for his/her safety at work and has to comply with all applicable laws and regulations to protect the environment, health and safety.

All supervisors have the duty to lead and support their team in carrying this individual responsibility.

### **14. PRIVACY POLICY**

REIWAG is committed to respect the privacy and integrity of its employees and business partners. All personal data collected and stored by REIWAG will be used solely earmarked, traceable, conscientiously and in accordance with the applicable data protection laws.

The access to personnel records is limited to REIWAG employees and persons, who have a valid authorization as well as a legitimate business interest for an inspection. Sensitive personal data may not be passed on without authorization or general legal basis to anyone inside or outside the company.

### **15. COMPLIANCE**

The REIWAG Facility Services GmbH and the individual companies of the Group are subject to various social, political and legal conditions that need to be considered.

Even the infringement of a single employee can seriously damage the reputation of our company and can cause substantial – also financial - damage to REIWAG. Our company does not tolerate any infringements and will not protect the responsible person from sanctions by the authorities.

Violations against the law, international standards and internal rules may result in disciplinary action (including the termination of employment) and civil or criminal prosecution.

It is always possible to avoid infringements by seeking early advice. Anyone who is not sure what requirements exist or whether his /her behaviour is flawless, is encouraged to check with the responsible supervisor or department (e.g. personnel, legal or financial department.)

In addition, any presumed or actual infringement must be reported. All reported cases will be thoroughly investigated and will be treated as confidential as possible.

No employee has to fear direct or indirect consequences if the report was submitted in good faith with good intent, even if the suspicion proves groundless.

## 16. CONTACT

Should you have any questions, suggestions or current information regarding this Code of Conduct, please contact your direct supervisor or the relevant department. Of course, the management of REIWAG Facility Services GmbH in Vienna, as the highest authority, is always available for important matters.

KR Viktor Wagner  
[wagner@reiwag.at](mailto:wagner@reiwag.at)

Thomas Dittrich  
[dittrich@reiwag.at](mailto:dittrich@reiwag.at)

Tel. +43 1 5239300  
Fax +43 1 5261705  
1070 Wien, Burggasse 60  
Austria

[www.reiwag.com](http://www.reiwag.com)

## 17. CONCLUSION

This Code of Conduct is a guideline and not an exhaustive list of rules. Each individual is called upon to act responsibly in order to avoid disadvantages which could affect REIWAG's cooperate group, our employees and our business partners.