

*** Whistleblowing Policy ***

1 Preliminary note

One of the Sirius Group's key values is integrity. The group is committed to the highest standards of openness, integrity and accountability and therefore does everything possible to prevent and deter misconduct and violations of law within the Group. As we live the "Open Door Policy", it shall be made as easy as possible for employees as well as persons who are in contact with the Sirius Group on all business levels to be able to report possible misconduct without being exposed to the risk of having to fear disadvantages in their professional as well as in their private life.

The following policy applies comprehensively to all members of the Sirius Group: Sirius Real Estate Ltd including all Dutch, British and Cypriot subsidiaries as well as all German subsidiaries specifically: Sirius Facilities GmbH, Curris Facilities & Utilities Management GmbH, LB2 Catering and Services GmbH, DDS Conferencing and Catering GmbH and SFG Nova Construction and Services GmbH.

It is ensured that all employees of the Sirius Group are aware of this policy and are thus enabled to report misconduct internally.

2 Purpose

The purpose of this policy is to detect misconduct and other violations of law in order to counteract any future violations and to take preventive measures that may prevent a violation or limit an existing violation. Detecting misconduct can sometimes only be done by whistleblowers* who might be associated with the misconduct. To ensure that these whistleblowers are not reluctant to disclose the necessary information due to fear of reprisals, Sirius Group expressly states that whistleblowers do not have to fear any disadvantages, but enjoy the protection and trust of Sirius Group.

This policy is intended to ensure that the Sirius Group's corporate actions are always at a "zero-crime" level.

3 Scope - personal scope

The objective and protection of this policy is not intended to benefit only Sirius Group employees*. The objective can only be achieved if the protection is extended to groups of persons who have a business relationship with the Sirius Group. Therefore, not only employees are covered by the personal scope of protection but, in addition, in particular shareholders and persons who belong to the administrative, management or supervisory body of the Sirius Group, including non-executive members as well as interns*, freelancers*, student employees*, service providers or other third parties who are related to the whistleblowers and could suffer reprisals in a professional context, such as colleagues* or relatives of the whistleblower.

4 Scope – material Scope

The material scope of application includes, in particular, the following areas or types of possible misconduct and violations of the law:

- Financial conduct of the company
- Fraud and money laundering
- Corruption, bribery and extortion
- Banking and financial crime
- Environmental protection and environmental crime
- Privacy and personal data protection

In addition, other serious misdemeanors are also covered, e.g. serious violations of labor law requirements or serious violations relating to discrimination within the meaning of the General Equal Treatment Act.

To avoid weakening this guideline, reports of such misconduct are to be omitted if they are in the light to moderate range. For such misconduct, the immediate supervisor remains the correct contact person or HR.

The Sirius Group expressly points out that reports containing information that is known to be untrue (misrepresentations) are to be omitted. It should be noted that the dissemination of untrue facts may constitute a criminal offense of defamation pursuant to Section 187 of the German Criminal Code (StGB). In addition, such reports must also be omitted if there are insufficient factual grounds to conclude that there has been actual misconduct.

It is also pointed out that the possibility of whistleblowing is to be handled as part of an escalation process, which means that an attempt should be made to discuss any violations with the immediate superior first.

5 Procedure for internal messages

Any person of the group of persons mentioned in § 3 who becomes aware of serious misconduct may use the following e-mail address to pass on a notice: whistleblowing@siriusfacilities.com. The use is voluntary.

The reporting channel is designed and set up in such a secure manner that the confidentiality of the identity of the whistleblower and third parties mentioned in the report is maintained and unauthorized employees are denied access to it.

Within 7 days, the whistleblower receives a confirmation message about the receipt of his or her report. The whistleblower will receive a further response not later than 90 calendar days thereafter.

All reports are handled by Sirius Real Estate's "Senior Independent Non-Executive Director", James Peggie. James Peggie is also responsible for deciding upon follow-up action.

The reporting can be done in English as well as in German language and can be done orally. For oral reports the following phone number can be dialed: +49800 606 044 080.

If potential whistleblowers are unsure whether or not to use the whistleblowing channel, or if there are general questions about whistleblowing, HR can be consulted or the potential whistleblower can also direct their questions to whistleblowing@siriusfacilities.com.

6 Confidentiality

Sirius Group shall ensure that the identity of the whistleblower is not disclosed to any person other than the employee responsible for receiving reports or taking follow-up action without the whistleblower's express consent.

Notwithstanding the foregoing, the identity of the whistleblower and information may only be disclosed if this is a necessary and proportionate duty under statutory provisions, for example in the context of criminal investigations.

Before his or her identity is disclosed, the whistleblower will be informed of this, provided this does not jeopardize the investigation.

7 Message documentation

The reported information is documented and processed in compliance with the requirements of the General Data Protection Regulation and national data protection regulations. Verbal reports are kept in written form.

8 Prohibition of reprisals

Only if a person does not have to fear reprisals will he or she decide to provide valuable information. Within the Sirius Group, whistleblowers are therefore protected in particular from the following reprisals:

- Suspension, termination
- Denial of a promotion
- Task shifting
- Refusal to participate in further training measures
- Failure to convert a fixed-term employment contract into an indefinite-term employment contract if the whistleblower was justified in expecting to receive an indefinite-term employment contract
- Discrimination, disadvantageous or unequal treatment
- Early termination or cancellation of a contract for goods or services

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