

Code of Conduct for Employees

For alstria¹ the pursuit for economic success is inseparable from its social responsibility. Thus, the fulfilment of this social responsibility is also one of alstria's corporate objectives. In this context, alstria issued a Code of Conduct and several internal guidelines which are to serve as a joint policy for the decisions and actions. The guidelines describe principles of alstria which are to be considered by each employee in his daily doing. The management board is responsible for the Compliance of alstria and ensures that alstria's employees adhere to this Code of Conduct. In the following an overview on the essential principles from the Code of Conduct and some of these guidelines is given:

1. Human Rights Commitment

alstria is fully committed to its responsibilities to respect human rights. We are designated to ensure that we are conducting ourselves in a manner that is consistent with high ethical standards. Within the entire group we are especially respecting the UN Guiding Principles on Business and Human Rights which are grounded on the recognition that states and companies are obliged to respect human rights. States are primarily responsible for protecting the human rights of their citizens. It is the obligation of states to translate their international human rights duties into national regulation and laws to ensure that human rights are protected. In situations when national laws do not cover internationally recognized human rights or the implementation of such laws is weak the UN Guiding Principles clearly expect companies to operate according to a higher international standard. In Germany, the degree to which human rights are respected and protected by the government is rather high. alstria is a German real estate company focusing solely on German office property. alstria operates in the framework of the German law and obeys the rules and regulations concerning human rights accordingly. alstria is designated to avoid causing or contribution to adverse human rights impacts through our own activities and we also expect our employees to fully observe human rights.

2. Legal Compliance

Legal compliance at any time is the essential basic principle of alstria's entrepreneurship. The reputation of alstria is essentially depending on the appearance, acting and behavior of each employee. Improper behavior, also of just one employee, can cause great damage to alstria. This applies particularly with regard to existing and future business connections with public authorities. In this regard alstria's reputation is of particular significance.

At all business activities and decisions, the employees of alstria always have to observe the law and other significant provisions. This applies on all hierarchy levels and also for external suppliers working for alstria.

3. Corruption and Bribery

alstria does not tolerate corrupt business practices by employees or external suppliers acting on behalf of alstria. Corruption is understood to be the acceptance or granting of advantages or benefits which are used to take unfair influence on business or official decisions. This expressly includes bribes in any form. Monetary gifts to business partners are strictly prohibited and perceived as (attempted) bribery. During an ongoing negotiation any kind of grants, invitations for events or hospitality are not permitted. Beyond that our employees shall not make or accept any grants in a value higher than EUR 50.00 net and shall limit invitation for events or hospitality to an assumed net-value of EUR 150.00. Employees of alstria are not allowed to offer, promise or grant office bearers monetary or non-monetary benefits of any kind.

Financial contributions (including in kind) may be made to organizations such as industry, trade and business associations, think tanks and research projects as well as for charitable purposes as part of alstria's corporate citizenship activities. However, financial contributions are made voluntarily, without expectation of any consideration in return, within the framework of applicable laws and regulations, and always require the approval of the management board. All

¹ alstria office REIT-AG and its majority owned subsidiaries

financial contributions made are to be reported to the Sustainability & Future Research department and will be published in alstria's sustainability report.

Financial contributions to politicians, political parties and political campaigns are not permitted and will not be made directly nor indirectly.

4. Anti-Competitive Practices

alstria is designated to compete in a fair manner and to comply with applicable antitrust laws and regulations.

5. Money Laundering

alstria complies with its legal obligations to prevent money laundering and does not engage in money laundering activities or terrorist financing.

6. Leadership and Example

The management board of alstria is responsible for leading and supervising alstria's employees. alstria's management board established guiding principles for good leadership. In their exemplary function, the management board and leaders are exceedingly responsible for the compliance to this Code of Conduct and alstria's internal guidelines and for supervising their observance.

7. Conflict of Interests

A conflict of interests can for example arise if an employee, his spouse or one of his relatives is involved in activities which have influence on his objectivity at work. Such activities can be for example additional businesses with tenants, suppliers, other business partners and competitors or financial or personal interests with one of these groups. Employees are obligated to inform a Compliance Officer and their superior if there is a conflict of interest or any doubt in this respect.

8. Confidentiality of Information and Insider Trading

If an employee receives information about alstria or tenants, suppliers or other business partners because of his employment which were marked as confidential or for which he had to assume that they were not publicly available, he has to treat these as confidential. He is only allowed to pass information on to persons who are authorized to know the information by their tasks as superior, employee or as external contractual partner. Passing confidential information on to other persons - internal as well as external - has to be documented.

No employee is allowed to utilize internal knowledge about alstria for the purpose of dealing in securities or other financial instruments of alstria, if the stock price might be influenced by such insider information. The information may without authorization not be passed on or made available to any third party nor may it be used for investment recommendations.

9. Discrimination and Harassment

All employees have the right to be treated fair, polite and respectful by superior and colleagues.

alstria supports the right of all persons to search for jobs, apply for employment, and perform their job free of any harassment whatsoever. alstria will neither permit harassment nor tolerate it implicitly, be it vis-à-vis employees (including temporary workers), applicants, employees of third-party companies, customers, suppliers, or any person visiting the Company's offices. Any form of harassment is unacceptable, thus alstria attempts to prevent such behaviour.

No one shall be harassed, discriminated or without factual reason preferred or disadvantaged at any time based on his gender, age, ethnic group, skin color, nationality, social origins, sexual orientation, religious conviction, ideology or disabilities. This also applies to recruiting, promoting, selecting for a job assignment or training programs.

All of alstria's employees are personally responsible for ensuring that they under no circumstances behave in such a way that another person could take offence at their conduct. Each employee shall respect the privacy sphere of any and all other employees. Sexual harassment or any other harassment is forbidden.

10. Health and Safety

Safety and health at work of alstria's employees are of extraordinary significance and play an important role in alstria's success. Several specific industrial safety regulations are applicable and complied with by alstria. Additionally, alstria pursues to implement best in class practices.

alstria would like to achieve an optimum protection for all of the employees. Therefore

- an external audit of safety at the Company's offices is regularly conducted,
- a health & safety committee meets up regularly to discuss all matters of safety and health,
- a security officer was appointed by alstria to support the management board in this matter,
- regular assessments of the workplaces are conducted,
- all employees are trained with regard to safety at work and
- alstria has a company doctor, who for example offers free flu vaccines on a voluntary basis.

Every employee at alstria shall take care of his own, his colleagues' and the guests' safety and health according to his possibilities.

11. Child Labour, Forced Labour and Freedom of Association

At alstria we are designated to ensure excellent employment conditions. We are clearly opposed to child labour and forced labour and do not tolerate them. Our employees can exercise the full labour rights permitted by applicable German law.

12. Environmental Protection

alstria shares responsibility for the carbon emissions associated with its buildings and commits to limit the impact of its operations to the overall environment to the best extend possible. Beyond all applicable laws governing environmental protection in Germany, alstria has established an energy policy to continually improve and monitor the energy performance of its buildings. To this extend the management board recognizes the significance to provide all necessary resources for its appropriate management. Every employee of alstria is expected to adhere to that policy.

13. Grievance Mechanisms

alstria encourages its employees to report violations of applicable law or this Code of Conduct or the employee handbook. Reporting violations helps to clarify and eliminate misconduct and malpractice and protects employees and the Company against risks and damages that may arise from this.

Employees can first contact directly the persons whose behavior worries them. If this is not possible, desired or has no prospect of success, employees can approach their superior or the human resources department (HR) or contact the Compliance Officer. alstria values an open atmosphere in which employees can approach the afore-mentioned contacts without hesitation and in confidence and in which critical comments can also be made. If violations of the law or of the values set forth in this Code of Conduct by alstria's business partners become known, they must be reported to the superior and the Compliance Officer.

Whistleblowers who have concerns about contacting the above-mentioned contacts can also use the Compliance Hotline which has been established with an external law firm to which employees may report any compliance incident also anonymously. However, in the interest of an open working atmosphere and to enable efficient processing, whistleblowers are requested to disclose their name when reporting a possible violation.

At alstria, all reports of possible misconduct are taken seriously. In the spirit of responsible corporate governance, violations are fully investigated impartially by the Compliance Officer or the Management Board and not tolerated.

Whistleblowers who provide information in good faith will not be held liable. Intimidation, retaliation or other reprisals against complainants or whistleblowers who report actual or suspected misconduct will not be tolerated and will be punished as compliance violations. This also applies, of course, if the report subsequently proves to be unfounded. In the same way, we deal fairly with persons who are accused of misconduct.

14. Internal Guidelines

In some areas, the Code of Conduct is further specified by internal company guidelines. The guidelines binding for all employees of alstria office REIT-AG and its group companies are summarized in an employee handbook which contains the following documents:

- Guideline 1: Corporate profile of alstria and its departments
- Code of Conduct
- Guideline 2: Provisions for procurement
- Guideline 3: Provisions for invoice release and invoice payment
- Guideline 4: Cash handling
- Guideline 5: Business travel, reimbursement for catering (Bewirtung) and travel expenses
- Guideline 6: EDP systems and data protection
- Guideline 7: Vacation
- Guideline 8: Use of mobile devices
- Guideline 9: Equal treatment of employees within the Company and prohibition of discrimination
- Guideline 10: Prohibition of harassment at the workplace
- Guideline 11: Money laundering
- Guideline 12: Company cars
- Guideline 13: Employee's benefits
- Guideline 14: Sabbatical
- Guideline 15: Health and safety
- Guideline 16: Flexible work