

CODE OF CONDUCT AT REAL GENERAL CONTRACTING GMBH

real General Contracting GmbH is an international construction services company delivering interior fit out, shopfitting, construction engineering services and a wide range of specialized solutions.

real General Contracting GmbH

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The reputation of real General Contracting GmbH is of the highest value and must therefore be preserved and protected. To this end, the amalgamation of entrepreneurial action with ethical principles is an absolute necessity and forms the fundamental basis of our success. The behavior of all of us in line with these principles ensures that real General Contracting GmbH enjoys an outstanding reputation and achieves success in business.

We are firmly convinced that corrupt actions must be avoided under all circumstances. Such actions expose real General Contracting GmbH and its staff to the risk of legal prosecution, exclusion from participating in tendering and damage to the reputation of the company, with negative consequences for the company's business and economic standing.

real General Contracting GmbH does not tolerate immoral and corrupt practices on the part of its employees or business partners and takes action against them if such actions occur. The following code of conduct defines our obligation and our commitment to comply with the law. We perform and settle our orders in an open, honest and fair manner.

real General Contracting GmbH commits to adhere to the following code of conduct:

- To preserve trustworthiness, business ethics and integrity.
- To pursue a policy of zero-tolerance when it comes to bribery and corruption.
- To strictly adhere to local and international laws, regulations and legal provisions.
- To ensure that no member of our staff may suffer any disadvantage within the company deriving from adherence to the law, legal regulations and/or the provisions of this code of conduct.
- To introduce measures that are adequate to prevent bribery and corruption within the company and among all of our business partners.
- To provide instruction to the staff to ensure that the behavior guidelines are understood and adhered to.

- To make sure that all necessary internal facilities are in place to support compliance with this guideline and to investigate reports of any kind.
- We uphold the principle that it is better to not enter into a business relationship than into a corrupt one.
- To ensure that anyone, anywhere in the world, who performs services in whatever function as an employee or on behalf of real General Contracting GmbH shall be bound by this guideline.
- To apply strict criteria governing hospitality as well as receipt and handover of gifts from or to our partners. To ensure that approval procedures are understood and adhered to.
- To conduct regular reviews and updates taking into account the entire feedback and all queries in order to ensure effectiveness of this guideline.
- Superiors have the responsibility to inform their team about all relevant guidelines and other internal regulations. Particular circumstances can be taken into account by means of additional, regional guidelines, containing supplementary regulations which, however, shall not conflict this code of conduct.

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International conventions, such as for the protection of human rights, the fight against corruption or for sustainability, must strictly be complied with. Management and staff members are responsible for behaving in accordance with the principals defined in this code of conduct. The fundamental principle is that no business occasion is worth compromising confidence in the trustworthiness of real General Contracting GmbH and therefore putting our good reputation at risk.

Compliance with this code of conduct guideline does not mean that real General Contracting GmbH is not allowed to invite its customers in order to get to know the business partner better and to build up an appreciative cooperation. When gifts or hospitality are given or received, there must not be any intention to expose the recipient to the giver's improper influence and reasonable financial limits have to be respected.

Employees shall contact their HR managers in case of any questions regarding legal regulations or this code of conduct and shall escalate this matter to the company management if they have the feeling that this is necessary.

The original document of this code of conduct is available upon request.

The management of real General Contracting GmbH assumes overall responsibility for this guideline.

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Signed:



Michael Betz
CEO

Date: 2021-01-29

Signed:



Marcus Beinert
CFO

Date: 2021-01-29