

Code of Conduct of VIB Vermögen AG

Preamble

The trust of our tenants and shareholders, our business partners and the general public hinges on appropriate conduct on the part of everyone acting on behalf of VIB Vermögen AG. Our aim of long-term, sustainable company growth is one that we can only achieve together. Our values, such as openness, transparency and personal responsibility – as well as conduct that is legally compliant and ethically irreproachable at all times – play a vital role in this regard.

This Code of Conduct outlines our key ground rules and principles; these are already valid in respect of our business activities today, but will also remain binding in the future. We regard this Code as a set of guidelines that applies to each and every one of us – members of the Managing and Supervisory Boards, executives and every single employee of the VIB Group – in equal measure.

We set the same standards for the conduct of our business partners as we set for ourselves. With a view to a long-term partnership based on a spirit of trust, we therefore encourage you to establish and implement similar principles and values at your company.

Compliance with legal requirements, lawful conduct

Here at VIB, all business-relevant decisions and actions are taken in a legally compliant manner, paying due regard to applicable laws and regulations. We expect our employees – as representatives of the company – to obey the law in both their professional and personal lives.

Fair competition

We regard fair competition as a key pillar of commercial success. We attach the utmost importance to openness and fairness in our dealings with our business partners. VIB employees do not procure competitive advantages by means of unethical or illegal business practices, such as corruption and bribery, or by manipulating and concealing information relevant to decision-making. Violations will not be tolerated and may result in penalties being imposed on the individuals concerned.

Diversity, equal opportunities and tolerance

Our employees make an important contribution to the success of the company. A culture of equal opportunities, mutual trust and respect for one another is of paramount importance to us. We value a positive working environment in which each and every employee can make the most of their potential and in which they are respected and supported.

We do not tolerate any form of exploitation, disregard or discrimination of people, for example due to their age, gender, health or background. Personal respect and individual appreciation for every single person is a defining characteristic of our dealings with employees and colleagues.

Avoiding conflicts of interest

At VIB, business decisions are taken solely in the interests of the company. A conflict of interest may therefore arise if the personal interests of an employee are at odds with the business interests of the company.

Preventing corruption

Neither unlawful conduct in the form of active corruption (the granting of unlawful benefits) nor in the form of passive corruption (the acceptance of unlawful benefits) will be tolerated at VIB. In order to avoid corruption, all VIB employees are subject to the Group-wide provisions set out in anti-corruption guidelines. Failure to comply with these guidelines may result in legal action under civil/criminal law.

Confidentiality and data protection

VIB takes all measures necessary to ensure that confidential information and business documents are protected in optimum fashion against access and viewing by unauthorised employees and other third parties.

Where VIB employees are classified as “insiders” on specific projects, they will be included on an insider list pursuant to statutory regulations and will be informed of, and instructed on, their obligations as insiders. Pursuant to the provisions of the Market Abuse Regulation of the European Union (MAR, Regulation [EU] No 596/2014), these persons are strictly prohibited from trading in VIB shares on the basis of insider information, communicating insider information to unauthorised third parties or making such information accessible to such third parties.

VIB takes the protection of employees’ and business partners’ personal data extremely seriously. We only collect or process personal data if it is absolutely necessary for us to do so as part of our business activities and we always do so in accordance with applicable legislation, particularly the General Data Protection Regulation (GDPR).

Public image and corporate communication

We respect the right to freedom of expression, as well as the need to protect personality rights and privacy. All employees should be aware that they may still be perceived as VIB staff members and representatives away from work. We are therefore all responsible for upholding the reputation and standing of VIB by means of our conduct in public.

We always provide the general public with prompt and comprehensive information concerning major business events at the company, as well as the latest developments in business figures. Such information may only be released by authorised personnel in the Corporate Communication and Investor Relations departments, or by the Managing Board itself.

Moreover, insider information is published without delay in the form of ad hoc notifications and made available on our website, as required by law.

Closing remarks

All employees are personally responsible for ensuring that they comply with the Code of Conduct. If they have any further questions about this Code of Conduct or any information about possible infringements of the law or guidelines, our employees as well as external third parties can contact VIB Vermögen AG directly at Verhaltenskodex@vib-ag.de.