02.11.2026

SUPERNOVA

CODE OF CONDUCT

SUPERNOVA GROUP

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I. INTRODUCTION

We, the Supernova Group[1], are an internationally operating group of companies with a high-quality portfolio of retail properties. The Supernova Group's services cover the entire life cycle of a property, from the initial idea and development through to sustainable utilisation and management. Thereby, the Supernova Group is subject to unconditional quality standards. Properties and retail spaces are not developed for the Supernova Group itself, but for the market and Supernova customers.

The Supernova Group is therefore primarily a point of contact for tenants, buyers, customers, interested parties, suppliers, service providers, business partners, financiers, public authorities, shareholders and other contractual partners ("***Partners***").

The Supernova Group is aware of its responsibility and role model effect and is committed to **responsible and legally compliant corporate governance**, the core components of which are quality, honesty, fairness and transparency. The Supernova Group is characterised by handshake quality, which forms the basis for constructive cooperation with Partners and employees. The Supernova Group therefore places high demands on the responsible, honest and transparent behaviour of its partners and employees.

The present Code of Conduct is an essential part of the Supernova Group's corporate culture and forms the basis for all business activities and decisions. The Code of Conduct is binding for all members of the management and corporate supervisory or advisory bodies, managers, employees and external workers in all companies of the Supernova Group ("***Supernova Employees***").

The Code of Conduct ultimately demonstrates that the application of the highest ethical and legal standards is a natural part of the Supernova Group's dynamic day-to-day business and working life. For the Supernova Group, the application and appreciation of the values of the Code of Conduct is crucial for the further development of its good reputation and its good relationship with Partners and Supernova Employees.

II. WHY DOES SUPERNOVANEED A CODE OF CONDUCT

By acting in accordance with the Code of Conduct, Supernova Employees protect the reputation of the Supernova Group as well as their own and minimise potential risks.

Violations of laws or rules of the Code of Conduct can be reported to a neutral body via the whistleblowing E-mail hotline. All reports can be made by name or anonymously if required and are treated in strict confidence.

[1] The Supernova Group consists of the Supernova private foundation and its affiliated companies.

III. BEHAVIOUR IN THE SUPERNOVA GROUP

A. BEHAVIOUR AND CONDUCT IN GENERAL

A.1 LAWFUL BEHAVIOUR - NO VIOLATIONS OF LAWS AND STANDARDS

The Supernova Group is committed to acting in accordance with the law. We achieve business transactions solely through our good reputation, the high quality and efficiency of our services.

Needless to say, the Supernova Group respects and complies with the applicable legal provisions of the countries in which it is active. Violations of the applicable legal provisions, standards and the Code of Conduct must be avoided.

A.2 RESPECTFUL BEHAVIOUR

Supernova Employees are the cornerstone of the Supernova Group's success. In order to allow their strengths to develop, the Supernova Group creates a working environment that practices this appreciation and promotes integrity. Fairness, respect, team spirit and candour characterise the cooperation between superiors, colleagues and employees. These principles also apply to behaviour towards (external) Partners.

Due to the international orientation of the Supernova Group, cooperation across divisions and countries is explicitly encouraged.

The decisive criteria for the selection and promotion of Supernova Employees are the performance, development capability and personal qualifications of each individual. The Supernova Group is committed to a culture of learning in which objective feedback is desired and valued by all those involved.

At Supernova Group, having confidence in the power of one's own performance means treating others with respect and setting an example through excellent work results.

A.3 RESPECT FOR HUMAN RIGHTS AND FAIR LABOUR CONDITIONS

The Supernova Group is aware of its responsibility as an international player in the market and makes an active contribution to improving human rights standards.

The Supernova Group respects internationally recognised human rights and supports their observance. This also means that the Supernova Group strictly rejects all forms of forced and child labour.

In particular, the Supernova Group is committed

- to the ten principles of the United Nations Global Compact in the areas of human rights, labour, environmental protection and anti-corruption. The Supernova Group is part of the United Nations Global Compact (UNGC) network, the world's largest and most important initiative for responsible corporate governance;

- to the United Nations Universal Declaration of Human Rights;
- to the European Convention for the Protection of Human Rights and Fundamental Freedoms.

Respect for human rights is expected from Partners as well. Supernova Employees must respect human rights as a binding guideline and be alert to possible human rights violations in their business environment. In the event of indications of human rights violations, Supernova Employees must endeavour to prevent or remedy these violations.

A.4. PROHIBITION OF DISCRIMINATION AND HARASSMENT

The Supernova Group is clearly opposed to any form of discrimination, harassment or workplace bullying.

The working environment must be characterised by appreciation.

The Supernova Group clearly distances itself from any form of discrimination based on gender, sexual orientation, marital status, regional or social origin, race, skin colour, religion, ideology, age, affiliation to an ethnic minority, disability of any kind or for any other reason. The same applies to any form of harassment and bullying. Supernova Employees are prohibited from such behaviour, not only within the Supernova Group but also towards Partners and other third parties.

A.5. RELIABLE COMMUNICATION (NO MISINFORMATION)

Transparent, prompt and reliable internal and external communication (whether verbal, written, via e-mail or the Internet) is an important part of the Supernova Group's corporate culture.

Potential customers and Partners are given appropriate access to the information they need to make a sound business decision.

The principle of correct and reliable communication must also be observed with employees and colleagues. Employees or management inform each other comprehensively, regularly and promptly about goals, plans and company data and make decisions transparent.

B. DEALING WITH PARTNERS AND THIRD PARTIES

B.1. SELECTION OF OUR BUSINESS PARTNERS

The Supernova Group places the highest demands on the quality of its services and is characterised by professional business practices.

Decisions are made freely and independently within the Supernova Group, without any dependency relationships arising. Supernova Employees do not allow themselves to be favoured by suppliers, service providers or customers.

A business policy in which "one hand washes the other" is rejected.

B.2. SPONSORING AND DONATIONS

As a company of a corresponding size, the Supernova Group is aware of its social responsibility and role model effect and is committed to sharing its success with society.

The Supernova Group therefore regularly supports various social and charitable initiatives in order to contribute to the common good.

All sponsorship measures and donations must be transparent. This means that the identity of the recipient, the intended use and other modalities must be known and documented in writing in a comprehensible manner.

Donations to political parties are not part of the Supernova Group's corporate culture.

C. COMBATING MONEY LAUNDERING AND CORRUPTION

C.1. CORRUPTION

Corruption is the abuse of power or decision-making authority (e.g. as a manager or managing director) with the intention of obtaining an unjustified advantage (e.g. monetary payment).

Supernova prohibits its employees, as well as all external persons, any kind and any extent of corruption.

C.1.1. OFFERING & GIVING ADVANTAGES

The Supernova Group is characterised by the high quality of its services and is clearly opposed to obtaining orders or concluding contracts through bribery or the granting of benefits.

The Supernova Group is firmly opposed to the offering and giving of cash, gifts and other benefits (e.g. offering employment) in order to gain an unjustified advantage. It is irrelevant whether this is done directly to the decision-maker or to a third party.

C.1.2. DEMANDING & ACCEPTING ADVANTAGES

Accepting an advantage is permissible if it is an everyday favour of merely minor value. When viewed critically, the impression must never be created that certain behaviour or even a consideration is expected upon acceptance.

Whether such an impression can arise depends on the circumstances of the specific individual case, in particular on the following factors:

- Value of the benefit
- Frequency with which benefits are granted

- Position of the recipient within the company

Benefits outside this framework are to be never be accepted secretly and must always be reported to the management - which may authorise the acceptance of the benefit after consultation with the Supernova Group's legal department. Cash and non-cash benefits (e.g. vouchers) offered to Supernova Employees by business partners and third parties are not to be accepted under any circumstances.

C.2. MONEY LAUNDERING

Money laundering occurs when assets (in particular money) resulting from criminal activity (e.g. drug trafficking, arms trafficking, in some countries also tax evasion) are converted or transferred to another person in order to conceal or disguise their illegal origin. Money laundering also occurs when the true nature, origin, location, disposition or movement of assets arising from criminal activity is concealed or disguised.

Any commercial transaction can be the target of money laundering activity. One of the Supernova Group's declared aims is to prevent money laundering.

The Supernova Group therefore applies a money laundering prevention concept that is constantly being optimised.

The Supernova Group's management and legal department are available to answer any further questions. Suspicious cases can be reported - also anonymously - to the appropriate channels in accordance with Supernova's Anti Money Laundering Guidelines.

C.3. MEASURES TO PREVENT CORRUPTION AND MONEY LAUNDERING

The Supernova Group has clear guidelines to counter corruption and money laundering. The Supernova Group observes the following key points in particular when dealing with partners and third parties:

- No payments are made in cash.
- Payments should only be made to the respective service provider or contractually authorised party such as the assignee.
- Payments should only be made by the respective service recipient.
- Payments are only to be made after passing through an internal approval chain. The principle of dual control applies as a minimum, with the number of approvals required increasing in line with the invoiced amount.
- The Partners of the Supernova Group are committed to the values of the Supernova Group and are also opposed to corruption and money laundering.
- The agreed business relationships and transactions must be transparent and comprehensible.

D. DEALING WITH CONFLICTS OF INTEREST

D.1 INTEGRITY AND TRANSPARENCY - NO CONFLICTS OF INTEREST

Supernova Employees avoid any collision of their private interests with the interests of the Supernova Group.

The Supernova Group's business relationships are based on objective criteria such as price, quality or the existence of a fair and established working relationship.

In the Supernova Group, relationships from which purely personal material or immaterial benefits are derived are not allowed to influence the conclusion of a contract or the continuation or termination of a business relationship.

Every Supernova Employee must always obtain authorisation from their Supervisor before taking up any further employment - including freelance work - or intending to become actively involved in business activities.

Should a Supernova Employee enter into an actual or potential conflict of interest, this must be reported to the management immediately and resolved together with the management.

E. COMPANY PROPERTY

E.1. RESPECT FOR COMPANY PROPERTY

The Supernova Group and Supernova employees achieve their business objectives by using company property, whether in tangible or intangible form.

Company property is to be used only for legally authorized business purposes. Damaged, stolen, misused or wasted company property harms Supernova Employees and the Supernova Group and impairs its business and financial performance.

When purchasing business equipment, the costs must be proportionate to the benefits.

E.2 Property rights

The material and intellectual property of the Supernova Group must be protected against loss, theft and misuse. The company value of the Supernova Group is based on the ideas and creativity of Supernova Employees who are committed to the success of the Supernova Group.

There must a confidential handling of secret information take place within the Supernova Group. This includes trade secrets and business secrets. Secrets are all facts, circumstances and processes that are not in the public domain but are only accessible to a limited group of people and which the Supernova Group has a legitimate interest in not disclosing.

Non-public information from or about suppliers, customers, consultants, etc. must also be treated confidentially.

Employees of the Supernova Group must keep such information, trade and business secrets confidential, already on the basis of their employment contract and their statutory duty of loyalty to their employer. That still applies following the termination of the employment relationship.

IT security, data security and data protection have a high priority at the Supernova Group. The Supernova Group has special areas of responsibility and access regulations in this context.

The Supernova Group is also committed to respecting the material and intellectual property of third parties and rejects unlawful ways of obtaining information.

F. PROHIBITION OF CARTELS AND COMPETITION

The Supernova Group is committed to fair competition and respects the rules of fair competition to prevent the abuse of market power and the formation of cartels.

This is to be distinguished from the observation of competition, which is necessary and desirable in compliance with the law.

G. ENVIRONMENT - CONSERVATION OF RESOURCES AND SUSTAINABILITY

The real estate industry has an undeniable impact on the environment.

The Supernova Group is committed to the common good and the concept of sustainability. These fundamental principles characterise its actions from an ecological, social and economic perspective. Compliance with the applicable environmental rules and regulations is a matter of course for the Supernova Group. Environmental aspects are taken into account at all levels and in all areas of the Supernova Group's activities, and in all phases of a property's life cycle. Natural resources are to be protected, materials saved and waste reduced.

The Supernova Group has already made a comprehensive commitment to environmental protection and resource-conserving business practices as part of its ESG documentation.

The Supernova Group's business decisions are always orientated towards the standards of sustainability and environmental protection. Equally, the Supernova Partners are committed to conducting business in an environmentally friendly and resource-conserving manner. This common goal is also reflected in various contracts between the Supernova Group and its partners.

The Supernova Group has its own Green Energy department, which deals exclusively with measures for renewable energy generation and utilisation. For example, the Supernova Group operates photovoltaic systems on the roofs of its retail spaces in order to utilise solar energy. The Supernova Group also maintains charging stations for electric vehicles and is constantly analysing new possible measures and trends in the area of environmental protection and sustainability.

The Supernova Group goes to great lengths to monitor report and analyse the available data on its environmental and social performance. Both internal and external audits and reviews are carried out.

H. DATA PROTECTION AND CORRECT REPORTING

H.1. DATA PROTECTION

Data protection is the basis for stable and successful customer relationships.

The Supernova Group uses personal data of Supernova employees and Partners exclusively within the framework of existing contractual relationships and in accordance with the legal requirements, in particular with the applicable national data protection regulations and guidelines of the Supernova Group.

Data is only transferred to processors (service providers) who offer sufficient guarantees for the lawful and secure use of data on the basis of a written service agreement.

In case of questions regarding the use and utilisation of personal data, the legal department of the Supernova Group should be contacted.

H.2 TRANSPARENT FINANCIAL REPORTING - NO MISLEADING INFORMATION

The Partner of the Supernova Group rely on it to provide them with exclusively truthful information on business performance, results and prospects.

The accuracy of accounting, records and financial reporting is a measure of the Supernova Group's credibility.

Internal control systems document key business processes appropriately and ensure that accounting-relevant information on business transactions is recorded completely and correctly.

Complete, clear and comprehensible document and file management is a matter of course for the Supernova Group.

The processes are suitably transparent and structured to ensure that other Supernova Employees can continue them at any time.

Legal or internal retention obligations are complied with. All documentation must be formally correct and consistent in terms of content so that it can be presented to third parties if necessary.

IV. IMPLEMENTATION/ WHISTLEBLOWING SYSTEM

The Supernova Group actively promotes the communication of the guidelines and agreements on which the Code of Conduct is based. The individual companies are

responsible for implementation and ensure that no Supernova employee suffers any disadvantage as a result of compliance with the guidelines and agreements.

The managers in the Supernova Group have a special role model function. They are the first point of contact for questions about understanding the regulations. As part of their management role, they prevent unacceptable behaviour or take appropriate measures to prevent breaches of the rules in their area of responsibility.

Good and trusting cooperation between employees and managers is characterised by honest and open information and mutual support.

The Supernova Group has set up a Whistleblowing E-mail hotline.

This is aimed not only at Supernova Employees, but also at Partners. Anyone is entitled to report circumstances that indicate a breach of this Code of Conduct to a neutral body, confidentially and anonymously. The Supernova Group will follow up on any information reported.

By contacting us again, the whistleblower can find out what steps have been taken in response to their report. Even if the whistleblower prefers to appear by name, no disadvantages need be feared.

V. CONTACT - DETAILS - VIOLATIONS AND REVIEW

A. CONTACT/QUESTIONS

Open communication and trust are integral parts of the corporate culture of the Supernova Group. If Supernova Employees and Partners have any questions on the content of this Code of Conduct including its interpretation, they are free to contact the Supernova Group. Supernova Employees can contact their line manager or the relevant HR department in the first instance. The Supernova Group has set up a central internal point of contact for Supernova Employees and Partners to direct any enquiries – whether direct or cross-site – to the legal department. Supernova Employees and Partners can contact the team confidentially by email at:

compliance@supernova.at

B. VIOLATIONS

Supernova Employees are obliged to apply the regulations in this Code of Conduct. Violations may damage the reputation of the Supernova Group and have detrimental consequences under civil and criminal law for the Supernova Group and/or the employee.
Disciplinary consequences for the employee may, in accordance with the applicable legal system, primarily be of a labour law nature (e.g. termination/dismissal).

C. APPLICABILITY AND REGULAR EVALUATION

This Code of Conduct has been approved by the management of the Supernova Group.
It is applicable to all Supernova Employees.

The Supernova Group will regularly review the Code of Conduct to ensure that it is appropriate and up to date, taking into account any changes in the law or in the business environment.

Some of the topics regulated in this Code of Conduct are regulated in more detail in guidelines that are binding for Supernova Employees. These guidelines continue to be binding for Supernova Employees and are not amended by the Code of Conduct but rather supplement it. In case of doubt, the stricter rules take precedence.