

# EPP Community Properties JV B.V.

## Tenants Code of Conduct

### Introduction

1. In the face of socio-economic and legal challenges, which entrepreneurs cannot ignore in their economic activity, the EPP CP Community Properties JV B.V.'s Group (the '**EPP CP Group**') and each of the companies forming part of the group (the company forming part of the group is defined for the purposes of the Code as '**EPP CP**') has undertaken to pursue its business activity in a sustainable manner.
2. The basic manifestation of the obligation undertaken by EPP CP is its Code of Conduct , which articulates the values and principles which EPP CP observes in the course of its business activity.
3. However, the implementation of the adopted strategy must take place in a broader perspective, so also at the level of the tenants of the assets managed by EPP CP.
4. Therefore, EPP CP adopts this EPP CP's Tenants Code of Conduct (the 'Code'), which is an expression of the expectations of EPP CP in relation of the entities leasing the premises in the assets managed by EPP CP ("EPP CP's Tenants") that they apply in their business activities, including business relations with EPP CP, the principles which EPP CP considers as essential and necessary to achieve the objective of conducting business in a sustainable manner.

### Sustainable development – compliance with the provisions of law and the ethics of business

1. EPP CP's Tenants should act in accordance with applicable laws, values related to conducting business in an ethical manner and in accordance with the principles of fair competition and good practices that are specified for the industry in which the EPP CP's Tenant operates.
2. EPP CP's Tenants shall make every effort to ensure that the materials used during the execution of the investment in the premises leased from EPP CP come from legal sources and meet all safety and technical requirements.

### Business Integrity

3. EPP CP's Tenant applies the approach of zero tolerance for corruption in its business activity. The manifestation of this commitment should be an anti-corruption policy or a firm statement of not applying corrupt practices in business activity and their implementation in practice.
4. EPP CP's Tenants take all possible measures to ensure that its employees or associates do not engage in corrupt practices, i.e. not to provide (offer) or accept any corrupt benefits neither in relationships with persons performing public functions nor in business relations.
5. EPP CP's Tenants avoid acting in the situation of a real or potential conflict of interest understood as a situation where the basis of a business decision are personal interests and personal benefits.

6. EPP CP's Tenants act in full respect of the principles of fair competition and good practices, applied to their business activity.
7. EPP CP's Tenants ensure that cooperation with business partners, including with EPP CP, is duly documented, i.e. in a reliable manner consistent with the law. This also applies to financial settlements between entities.

### **Confidentiality**

8. EPP CP's Tenants should keep confidential any information provided to them by EPP CP in their business relationship and undertake actions in order to prevent their use against the law. Transfer of confidential information or business secrets may be effected only if it is necessary on the basis of applicable laws or when the EPP CP's Tenant is authorised by EPP CP to do so.

## **Sustainable development – working conditions, safety of work, equal treatment in employment and cooperation**

### **Working conditions**

1. EPP CP's Tenants comply with the provisions concerning employment and termination of employment relationships and other agreements on the basis of which work is provided to EPP CP, including, among others, timely notifications to social security and health insurance.
2. EPP CP's Tenants regularly pay remuneration to its employees, associates and subcontractors.
3. EPP CP's Tenants do not use forced, slave labour or work provided under duress, threat or other unauthorised form of mental abuse.
4. EPP CP's Tenants employ foreigners, disabled persons, juvenile workers and children on the terms and within the limits specified in the labour law.
5. EPP CP's Tenants oppose illegal employment by its counterparties.
6. EPP CP's Tenants comply with the rules governing the working time rules, including, inter alia, providing employees with the required resting periods, allowing employees to use breaks in their work, including ensuring their time for meals.

### **Occupational Health and Safety**

1. EPP CP's Tenants comply with the requirements of the applicable occupational health and safety regulations, fire safety regulations and other applicable regulations resulting from the type of business activity.
2. EPP CP's Tenants guarantee safe and hygienic working conditions for its employees and associates, including access to drinking water, sanitary facilities, including showers, changing rooms and resting or eating places, as well as access to emergency medical assistance.
3. EPP CP's Tenants undertake all possible measures aimed at preventing accidents at work and occupational diseases, including but not limited to, regular occupational health and safety training for employees and associates and persons supervising them.

4. EPP CP's Tenants verify whether their employees and associates have the required qualifications and have the necessary (or needed) authorisations in accordance with applicable laws and indications of knowledge and experience – for the performance of specific tasks or work.
5. EPP CP's Tenants ensure the maintenance of order at the workplace, keeping evacuation routes passable and the necessary equipment.

### **Principle of equal treatment in employment or in cooperation**

1. EPP CP's Tenants promote friendly working environment among employees and associates, where employees and associates are not exposed to any form of physical, mental or verbal aggression. EPP CP's Tenants do not accept any form of disrespecting and rude language or verbal abuse. They react in the event of a violation of human dignity, mobbing or discrimination.
2. EPP CP's Tenants do not apply and prevent any form of violence at work, including in particular mobbing, harassment, sexual harassment, physical assaults, threats and any other violations of personal rights of employees and associates. EPP CP's Tenants ensure equal rights and opportunities for development for everyone.

### **Sustainable development – environmental protection**

1. EPP CP's Tenants undertake to conduct its business activity in accordance with the principles of environmental protection and sustainable development.
2. In order to minimise the environmental impact of its activities, EPP CP's Tenants undertake to:
  - a. use natural resources in a sustainable manner (including water and other media) i.e. in a manner limited to what is necessary for the proper performance of the business activity conducted by EPP CP's Tenant,
  - b. limit the use of dangerous substances.
3. EPP CP's Tenants undertake efforts to reduce the amount of waste generated and to manage the waste generated in such a way that it can be reused (recycled). Non-recyclable waste (including dangerous waste) are removed or disposed of in accordance with applicable laws and the highest waste management standards.
4. EPP CP's Tenants undertake efforts to reduce the amount of liquid waste generated and the emission of pollutants arising from the conducted business activity.

### **Tenants supply chains**

When entering into cooperation with EPP CP, EPP CP's Tenants declare that they will endeavour to shape their own chains of supply of services and products in such a way that their business partners are guided by at least the values and principles set out in this Code.