

EPP CP Suppliers Code of Conduct

Introduction

1. In the face of socio-economic and legal challenges, which entrepreneurs cannot ignore in their economic activity, the EPP 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 supply chain.
4. Therefore, EPP CP adopts this EPP CP Suppliers Code of Conduct (the 'Code'), which is an expression of the expectations of EPP CP in relation of its Suppliers 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.
5. EPP CP Suppliers to which the Code is addressed are entities providing services to EPP CP, including entities implementing investments for EPP CP.

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

1. EPP CP Suppliers 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 any technical standards that are specified for the industry in which the EPP CP Supplier operates.
2. EPP CP Suppliers shall make every effort to ensure that the materials used during the execution of the investment come from legal sources and meet all safety and technical requirements.

Business Integrity

3. EPP CP Supplier 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 Suppliers 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 Suppliers 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 Suppliers act in full respect of the principles of fair competition and good practices, applied to their business activity.
7. EPP CP Suppliers 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 Suppliers should keep confidential any information provided to them by EPP CP in their business relationship and which EPP CP indicates as covered by business secret or confidential 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 Supplier 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 Suppliers 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 Suppliers regularly pay remuneration to its employees, associates and subcontractors.
3. EPP CP Suppliers do not use forced, slave labour or work provided under duress, threat or other unauthorised form of mental abuse.
4. EPP CP Suppliers employ foreigners, disabled persons, juvenile workers and children on the terms and within the limits specified in the labour law.
5. EPP CP Suppliers oppose illegal employment by its counterparties.
6. EPP CP suppliers 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.
7. EPP CP Suppliers, in the case of requiring employees to perform work outside the permanent place of work, provide them with appropriate accommodation and transport conditions.

Occupational Health and Safety

1. EPP CP Suppliers comply with the requirements of the applicable occupational health and safety regulations, fire safety regulations and other applicable regulations resulting from the type of service provided.
2. EPP CP Suppliers 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 Suppliers 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.
1. EPP CP Suppliers make every effort to ensure that the equipment used in the execution of the investment, or the provision of services is of high level of safety and, does not endanger the environment.
2. EPP CP Suppliers 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.
3. EPP CP Suppliers ensure the maintenance of order at the workplace, keeping evacuation routes passable and the necessary equipment in the area of the works performed.

Principle of equal treatment in employment or in cooperation

1. EPP CP Suppliers 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 Suppliers 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 Suppliers 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 Suppliers ensure equal rights and opportunities for development for everyone.

Sustainable development – environmental protection

1. EPP CP Suppliers undertake to implement the investment in accordance with the principles of environmental protection and sustainable development.
2. In order to minimise the environmental impact of its activities, EPP CP Suppliers 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 completion of the service or investment,
 - b. limit the use of dangerous substances,
 - c. appropriately store and secure materials for the duration of their transport (in particular dangerous materials) used by them for the purposes of executing investments or providing services.
3. EPP CP Suppliers 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. When performing investment or providing services for the benefit of EPP CP, EPP CP Suppliers, as far as it is possible, select recycled materials.

4. EPP CP Suppliers undertake efforts to reduce the amount of liquid waste generated and the emission of pollutants arising from the performed investment or provided services.

Suppliers supply chains

When entering into cooperation with EPP CP, EPP CP Suppliers 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.

The importance of the Code

The condition for establishing and maintaining cooperation with EPP CP Suppliers, is that the Suppliers are familiar with the Code, declare that they will apply the principles set out in the Code in practice and that they actually do so.

EPP CP SUPPLIER DECLARATION (entities other than natural persons)

I, the undersigned

.....,

acting on behalf of (name of the entity with its National Court Register (KRS) number

.....

with its registered office at the address

.....,

as its duly authorised representative,

declare that:

- I have read and understood the EPP CP Suppliers Code of Conduct and I understood the content thereof, and I undertake, on behalf of the entity which I represent, to apply it in connection with the services rendered / the investment carried out* by [name of the represented entity] for the benefit of EPP CP, within business relations with EPP CP;
- I am aware that the lack of actions aimed at implementing the principles expressed in the EPP CP Suppliers Code of Conduct may result in termination of the agreement constituting the basis for business relations between [name of the represented entity] and EPP CP;
- I consent to communicate to EPP CP the information or documents indicating the performance by [name of the represented entity] of the principles enshrined in the EPP CP Suppliers Code of Conduct.

[place] [date] [name, function in the represented entity]

* delete as appropriate

EPP CP SUPPLIER DECLARATION (natural persons)

I, the undersigned

.....,

conducting business activity under the business name

.....

with its registered office at the address

.....,

declare that:

- I have read and understood the EPP CP Suppliers Code of Conduct and I understood the content thereof, and I undertake to apply it in connection with the services provided/ investment carried out* for the benefit of EPP CP as part of my business activity;
- I am aware that the lack of actions aimed at implementing the principles expressed in the EPP CP Suppliers Code of Conduct may result in termination of the agreement constituting the basis for economic relations which I establish or continue with EPP CP;
- I consent to communicate to EPP CP the information or documents indicating the implementation of the principles enshrined in the EPP CP Suppliers Code of Conduct within my business activity.

[place] [date] [name]

* delete as appropriate

Questionnaire for the verification of EPP CP Suppliers in terms of implementing the objectives of sustainable development in the context of business relations with EPP CP

The purpose of this questionnaire is to obtain information by EPP CP about the actions which EPP CP Suppliers undertake to implement the principles expressed in the EPP CP Suppliers Code of Conduct .

EPP CP does not expect that EPP CP Suppliers will demonstrate the overall performance of sustainable development objectives. The objectives have a dynamic dimension and strategies for their implementation require constant adaptation to the changing legal, economic, social and political environment as well as the one concerning protection of the natural environment and its resources. However, EPP CP is committed to ensuring that its Suppliers undertake real actions to achieve the objectives and that the actions, together with the activities undertaken by EPP CP, contribute to the sustainable development of each of the EPP CP Suppliers and EPP CP and to strengthen the trend which EPP CP believes must be followed in the face of the challenges connected with business activity.

Any information provided by the EPP CP Supplier to EPP CP by filling in this document shall be used by the EPP CP only for the purposes of verifying the involvement of the EPP CP Supplier in conducting business in a sustainable manner. EPP CP undertakes not to disclose the information except when the request for its disclosure is made by a public authority and it will be justified in the light of the applicable provisions of law.

General information about the EPP CP Supplier

Company / individual activity name:

[...]

Registered office address and contact details used for business purposes:

[...]

Type of services provided to EPP CP or investment performed for the benefit of EPP CP:

[...]

Number of employees as at the date of completing the questionnaire: [...]

Number of associates (persons cooperating with the Supplier under a specific work contract, contract of mandate, cooperation agreement) as at the date of completing the questionnaire: [...]

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

Question	Answer
Has the EPP CP Supplier, in the framework of its business activity, adopted internal procedures, policies or regulations governing particular areas of its activity and containing principles and rules, how to proceed in order to ensure compliance with the provisions of law, human rights and ethical values as well as good practices in conducting business activities within the scope of the Supplier's activities? (the so-called compliance procedures)	yes/no
Has the EPP CP Supplier adopted a code of ethics in the framework of the adopted internal procedures?	yes/no

Business Integrity

Anti-Corruption Policy

Has the EPP CP supplier adopted and applies an anti-corruption policy?	yes/no
Are employees or associates of the EPP CP Supplier trained in anti-corruption policy?	yes/no
Is the anti-corruption policy communicated to the counterparties of the EPP CP Supplier?	yes/no
If the EPP CP Supplier does not have any anti-corruption policy, has the EPP CP Supplier undertaken to counteract corruption as part of its business activity, e.g. in the form of the applicable declaration?	yes/no

Confidentiality

Are the employees and associates of the EPP CP Supplier informed of the scope of business secret and the rules concerning information covered by the business secret of the EPP CP Supplier's business and its counterparties, including EPP CP or are they trained in this area? (definition, rules of dealing with confidential information and information covered by business secret)	yes/no
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Sustainable development – working conditions, safety of work, diversity and equal treatment in employment and cooperation

Occupational Health and Safety

Does the EPP CP Supplier conduct training on occupational health and safety for employees or associates and persons supervising them?	yes/no
Are OHS training sessions cyclical?	yes/no
Do the employees or associates of the EPP CP Supplier within the scope of the conducted activity make use of equipment the use of which may pose a risk to the employees or associates or to the environment?	yes/no
Does the EPP CP Supplier regularly review the equipment used by the employees or associates of the EPP CP Supplier in terms of its performance and safety?	yes/no
Does the EPP CP Supplier apply the forms of monitoring the employees and associates aimed at ensuring occupational health and safety or proper use of working tools?	yes/no
Does the EPP CP Supplier verify whether employees or associates perform work without being under the influence of alcohol or other intoxicants?	yes/no

Principle of equal treatment in employment or in cooperation

Does the EPP CP Supplier employ employees or cooperates with people affected by disability (motor or mental)?	yes/no
Does the EPP CP Supplier undertake action to create conditions for employment or cooperation with people affected by disability?	yes/no
Does the EPP CP Supplier employ or cooperates with citizens of countries other than Poland?	yes/no
Has the EPP CP Supplier adopted a procedure to prevent mobbing and discrimination?	yes/no

Sustainable development – environmental protection

Does the EPP CP Supplier define the objectives regarding environment protection, carbon footprint reductions and sustainable use of natural resources within its business activity?	yes/no
Does the EPP CP Supplier undertake measures to implement solutions involving the use of renewable energy sources?	yes/no
Does the EPP CP Supplier undertake measures to limit the use of hazardous substances (if they are used in the course of its business)?	yes/no
Does the EPP CP Supplier implement a policy of limiting the amount of waste generated as part of its business activity and such management of the generated waste so that their reuse (recycling) is possible?	yes/no
Does the EPP CP Supplier keep records of waste?	yes/no
Does the EPP CP Supplier seek to select recycled materials as part of its business activity?	yes/no