



GENESIS PROPERTY

CODE OF CONDUCT

Last update: 14 October 2022

GENESIS PROPERTY creates sustainable and healthy, attractive and resilient places where people want to live and work, socialize and relax, today and in the future. Only an organization based on solid values, with motivated employees and in close collaboration with all stakeholders can contribute to achieving this purpose.

Purpose

This Code of Conduct represents the conduct and behavior framework that governs the daily activities within the group of companies known publicly under the name of Genesis Property.

Genesis Property is a registered trademark of the company Genesis Property International S.A. and it represents the generic name under which the companies that own and manage from a service point of view the class A office buildings located in **West Gate Business Park** and **Novo Park**, as well as the private student campus West Gate Studios ("**Genesis Property**") are known. Through the Genesis Property companies, we offer services (e.g., property management, facility management, help desk, cleaning, guard/security, reception, handyman, landscaping, fire protection, project management, real estate development etc.) for the employers and employees who have their office in West Gate Business Park and Novo Park. Thus, any reference to Genesis Property in this Code of Conduct is a reference to all the companies described above as well as to each company separately, as the case may be.

The Code of Conduct contains advice and guidance to ensure that we all act fairly in our relationships with each other, with our customers and partners, with the communities in which we operate, and with society as a whole. It is the guide by which we put into practice the values that bring us together.

The Code of Conduct applies to all Genesis Property employees, regardless of position, including temporary employees, sub-contractors or consultants or any other person representing each company within Genesis Property.

Last but not least, we expect all interested parties to respect this Code of Conduct and the principles contained therein.

Responsibilities and Management

The General Directors and the members of the Boards of Directors of the companies that form Genesis Property are responsible for

implementing and ensuring compliance with the provisions of the Code of Conduct.

The managers and coordinators must adopt a leadership style based on personal example and are required to discuss the content of this document within the teams they lead, to create a work environment where employees feel comfortable discussing openly any issues related to this Code of Conduct. Managers must also ensure that all employees are regularly trained in relation to the provisions of the Code of Conduct.

It is the responsibility of each employee to act in accordance with the provisions of this Code of Conduct and to seek clarification and support from their senior manager on any issue related to its enforcement. This Code of Conduct is supplemented by detailed policies and instructions that provide additional guidance.

Legislation and Regulations

Everyone who works for Genesis Property must comply with the laws and regulations that govern the operations specific to the work they perform. This is the minimum requirement for each chapter of the Code of Conduct. We do not tolerate or suggest anyone to commit illegal acts. Employees who have any suspicions or doubts about the activities carried out are encouraged to seek advice, guidance and clarification before acting.

Genesis Property through Genesis Property International S.A. is a signatory and supporter of the UN Global Compact. In addition to ensuring compliance with the law, we are all committed to respecting and promoting international conventions and standards in the areas of human rights, working conditions, environmental protection and anti-corruption.

Business Conduct

This Code of Conduct establishes and promotes the fundamental aspects of ethical behavior that the management of Genesis Property companies uphold in their day-to-day business and activities. Integrity and ethical behavior in business are the principles that underlie the relationships established with our collaborators, tenants, customers, suppliers and partners, but also with the members of the communities we have created. All our employees must act with honesty and empathy, determination and integrity in their relationships with their colleagues or business partners.

The ethical principles promoted by Genesis Property are as follows:

- Respect for the dignity and rights of every person, regardless of race, gender or religion,
- Strict compliance with the law,
- Professional, integrity and honest behavior.

At the same time, Genesis Property promotes the balance between professional and personal life and the commitment towards the community.

Behavioral Obligations It is necessary to be responsible for everything we say and do, to respect the agreements we enter into and to ensure that they are applied correctly.

We must not use our position for personal gain.

Bribery, in any form, is not tolerated at Genesis Property.

Business decisions are made based solely on the business interest of Genesis Property and not based on individual considerations or relationships.

Activities that could constitute a conflict of interest are not allowed.

Genesis Property does not tolerate any employee to threaten, intimidate, or participate in any kind of acts of aggression, regardless of whether they take place during working hours or in their free time.

Working Conditions Genesis Property provides safe working conditions and takes a proactive approach to workplace health and safety. We are continuously improving our competence and knowledge in this area. We always work safely and help our colleagues prevent potentially risky or health-threatening situations from occurring. No one is allowed to be under the influence of alcohol, drugs or other psychotropic substances at work.

We believe that positive, open, honest and professional people are success factors for Genesis Property. We also believe that a diverse and engaging environment inspires people to reach their highest potential. To improve employee engagement, we take care of their well-being and encourage teamwork, continuous learning and good collaboration.

We support diversity and our approach is to treat all current and prospective employees fairly, with respect and without bias. Everyone, regardless of gender, ethnicity, age, disability, religion or sexual orientation, is provided with equal opportunities for employment, remuneration, development and promotion within Genesis Property companies. Discrimination, bullying, harassment or threats of any kind are not tolerated.

Care for the Environment

Sustainability has become an integral part of Genesis Property's strategy, thus integrating the entire business vision and all business activities and operations into its principles. In this way, Genesis Property contributes to the implementation of the 2030 Agenda for Sustainable Development adopted in 2015 by all member states of the United Nations.

Genesis Property is a leader on the real estate market in Romania in terms of efforts to continuously improve environmental performance. This result is possible thanks to the involvement of our employees, who play an important role in identifying, measuring, monitoring and continuously reducing the negative impact that our activities generate on the environment.

In accordance with the transparency commitments assumed by Genesis Property management, all information related to sustainability policy and performance, including environmental, will be available by the end of this year on the Genesis Property website and on the UN Global Compact website at the link [Genesis Property International S.A. - UN Global Compact](#), so that any interested party can consult them.

Data Protection and Confidentiality

We value open and honest communication with all stakeholders while protecting our trade secrets. Information about our operations and those of our partners may only be used for the purposes for which they are intended. Employees who gain access to personal data through the specifics of their activity must comply with the requirements of applicable legislation and regulations, specific internal policies and instructions, as well as contractual obligations.

We undertake to comply with the provisions of *Regulation no. 679 of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data*, to protect the confidentiality of the persons whose personal



data are processed by Genesis Property. We are also committed to complying with all legal and contractual obligations of confidentiality.

Communication of Complaints

The employees are encouraged to report any violation or non-compliance with the Code of Conduct to their senior manager, General Director, Board of Administration or President of the Board. Employees who choose to remain anonymous can send the notification to the address specially created for this purpose cod.conduita@genesisproperty.net.

Any action that violates this Code of Conduct and that may harm the reputation of Genesis Property, may lead to the initiation of legal proceedings against any relevant party and its employees. Also, any violation of the Code of Conduct may lead to disciplinary action against the employee in question.

Implementation

Genesis Property is committed to overseeing the implementation and effective enforcement of the principles of this Code of Conduct. The content of this document must be updated annually or whenever deemed necessary, based on the results obtained and the experience gained.