



GENESIS PROPERTY

CODE OF CONDUCT FOR SUPPLIERS

Last update: 14 October 2022

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 services 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 a whole, as well as to each company separately, as the case may be.

Genesis Property companies are honest and trustworthy companies whose operations reflect a total commitment to excellence, innovation, integrity and long-term collaboration, values that support all their business. Genesis Property creates sustainable and healthy, attractive and resilient places where people want to live and work, socialize and relax. Thus, we generate value through spaces that differentiate and through innovative experiences that connect places with people and their teams.

Through the internal Code of Conduct, Genesis Property has established its own standards regarding business conduct, working conditions offered to employees, care for the environment and the protection of personal data and privacy. Genesis Property expects its partners, suppliers and customers to make similar commitments by complying with this Code of Conduct for Suppliers and by training their employees, agents, sub-contractors or consultants on its provisions.

General

This Code of Conduct for Suppliers ("**Code of Conduct**") represents the framework of conduct and behavior that must govern the day-to-day activities of Genesis Property's partners, suppliers and customers, including employees, agents, sub-contractors or consultants (collectively referred to as "**Suppliers**").

The Code of Conduct establishes basic principles for the Suppliers' behavior when collaborating with Genesis Property. Genesis Property is committed to respecting all these principles and expects the same commitment from its Suppliers.

Genesis Property complies with the national legislation and is committed to respecting and promoting international conventions and standards in the field of human rights, working conditions, environmental protection and anti-corruption. Furthermore, Genesis Property expressly recognizes the ten principles of the UN Global Compact and supports their observance and application in the field of human rights, labor and environmental standards and the fight against corruption in business relations.

Human Rights and Working Conditions

The Suppliers must support and respect the protection of internationally guaranteed human rights and ensure that they are not complicit in human rights violations.

Respect for human rights means that the Suppliers must use due diligence to avoid human rights violations and must address the negative human rights impacts they may be involved in. In addition, beyond respecting human rights, the Suppliers are encouraged to take steps to support human rights. Action to uphold human rights should be a complement to and not a substitute for action to respect human rights.

The Suppliers must support and respect the human rights through their daily activities in the workplace, and this purpose can be achieved by approaches similar to those listed below (this list is not exhaustive):

- ensuring safe and healthy working conditions,
- ensuring non-discrimination in recruitment processes,
- ensuring the non-use, directly or indirectly, of forced labor or child labor and the prohibition of all forms of forced or compulsory labor/modern slavery,
- ensuring access to basic health,
- ensuring access to education and housing for workers and their families, when appropriate,
- initiating debates on respect, dignity, fairness and equality at work and discussing specific scenarios that managers and employees may face,
- prohibition of discrimination and harassment at work and any other forms of abuse,
- compliance with requirements regarding working hours and rest days,

- respecting the employees' right to freedom of association and the effective recognition of the right to collective bargaining, in accordance with national laws,
- ensuring transparency of remuneration and job description requirements,
- ensuring effective procedures for resolving complaints and remedying any human rights violations,
- the existence of programs to employ victims of domestic violence; and/or
- respecting the religious practices of all employees.

The Suppliers should implement monitoring and auditing processes to track the evolution of the internal human rights protection policy, because regular reviews are crucial. Monitoring generates the necessary information to ensure continuous improvement and to make the necessary adjustments within the internal policies for the protection and support of human rights. Monitoring of these processes should be based on feedback from internal and external stakeholders, and confidential means of reporting non-compliance, such as telephone helplines, can be a useful source of feedback.

Environmental Protection

Sustainability represents an integral part of Genesis Property's strategy and our business vision, and all of our business activities are circumscribed by the principles of sustainability and environmental protection. 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.

Equally, the Suppliers should undertake constant efforts to improve their environmental performance, by identifying, measuring, monitoring and continuously reducing the negative impact that their activities generate on the environment. The Suppliers should develop and implement a precise environmental policy that reflects all applicable laws and regulations regarding environmental protection and conduct their business activities in accordance therewith, including but not limited to the efficient use of resources, ensuring sustainable consumption and production patterns, working in safe and healthy workplaces, ensuring product safety and compliance and minimizing environmental impact according to the Sustainable Development Goals included in the 2030 Agenda for Sustainable Development.

The Suppliers should support a prudent approach to environmental challenges by developing initiatives to promote greater environmental responsibility and encourage the development and diffusion of green technologies.

Anti-corruption

The Suppliers must work against corruption in all its forms, including extortion, bribery, blackmail or embezzlement.

To meet this purpose, the Suppliers must comply with the requirements of the applicable national anti-corruption legislation and also comply with all international and European Union anti-money laundering regulations. Thus, the Suppliers should not take any action that could violate the rules of anti-corruption legislation, such as soliciting, receiving or offering illegal payments directly, through third parties or as an intermediary, including but not limited to cash bribes or any other form, offering incentives or payments to any natural or legal person (e.g., public authorities, civil servants, private companies and their representatives, etc.).

In their direct relationship with Genesis Property, the Suppliers must not take any action that could violate the rules of anti-corruption legislation or could cause such a violation by Genesis Property, and in this regard the Suppliers will not take or give bribe and will not offer any incentive or payment (e.g., gifts, benefits, perks, employment opportunities, etc.) to any Genesis Property employee or representative, their family or friends, to obtain or retain contracts with Genesis Property or to secure any business advantage with Genesis Property. Last but not least, the Suppliers must ensure that there is a clear distinction between personal relationships and business activities.

If the Suppliers find themselves in any of the situations set out above, they must immediately notify Genesis Property in writing with full details and file a complaint with the relevant authorities in accordance with the applicable law.

Compliance with the Code of Conduct

Genesis Property is willing to work with its Suppliers to ensure that they comply with the standards and principles stated above.

Genesis Property reserves the right to evaluate and monitor the Suppliers' compliance with the Code of Conduct. The Code of Conduct is an integral part of the contracts concluded between Genesis Property and its Suppliers, and Genesis Property reserves



the right to terminate any agreement with any Supplier that does not comply with the principles mentioned in the Code of Conduct.

The Suppliers who reasonably suspect that an employee of Genesis Property or any person acting on behalf of Genesis Property has engaged in improper conduct in the relationship with the Supplier, which violates the principles evoked in the Code of Conduct, should immediately report this situation to Genesis Property. Likewise, any activity inconsistent with this Code of Conduct by any Supplier that impacts Genesis Property should be reported to Genesis Property immediately. Equally, in such a situation, it is expected that the Suppliers undertake immediate remedial measures.

Any violations of the provisions of the Code of Conduct or any concerns and questions from the Suppliers regarding the Code of Conduct can be communicated to Genesis Property using the following e-mail address: cod.conduita@genesisproperty.net.