

# PATRIZIA Supplier Code of Conduct

Responsible: PATRIZIA Sustainability Management

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# PATRIZIA Supplier Code of Conduct

PATRIZIA AG<sup>1</sup> (in the following: PATRIZIA) is consciously aware of how our business impacts on society and the environment. We are proud of being a company that does business responsibly and ethically. We believe that the decisions we make today define our stakeholders' lives tomorrow, we therefore have policies, processes and controls which reflect our commitment to:

- Protection of the environment
- Protection of employees
- Community involvement
- Compliance and ethics.

We wish to only engage with suppliers and contractors who are committed to similar standards. PATRIZIA requires its third-party suppliers and contractors to confirm – on its own behalf and on behalf of its subsidiaries, employees, authorised representatives and subcontractors (each, a “Representative”) – that it will comply with the requirements set out in this code (the PATRIZIA Supplier Code of Conduct)<sup>2</sup>. Our suppliers should have processes in place to maintain these standards and be able to provide evidence if required.

The PATRIZIA Supplier Code of Conduct applies whenever PATRIZIA contracts with a third-party supplier or contractor for the supply of any goods or services and must be strictly complied with.

## 1. Protection of the environment

At PATRIZIA we are very aware how our action impacts the climate. Our strategy is to build resilience and do more each year to mitigate our environmental footprint. We equally require our suppliers to consider their impact on the environment and encourage them to provide positive solutions to reduce the effects their products, services and delivery processes have on the environment. We expect that our business partners will comply with all statutory provisions relating to environmental protection as well as additionally using reasonable endeavours to use natural resources in an economical and environmentally responsible manner.

## 2. Protection of employees

PATRIZIA encourages behaviours and actions that are consistent with International Labour Organisation (ILO) Core Conventions and we aim to work with suppliers whose values are consistent with ours. We also comply with The Modern Slavery Act 2015 and require our suppliers to do the same. Our business partners are required to ensure compliance with the relevant rights for the protection of workers. This relates to compliance with the statutory provisions concerning working times and holidays, as well as provisions for the protection of health.

<sup>1</sup> This policy applies to PATRIZIA AG and all legal entities in which PATRIZIA AG directly or indirectly holds more than 50 % of the shares or voting rights (each hereinafter referred to as a “Company” and together “PATRIZIA”).

<sup>2</sup> If any contract expressly or by implication amplifies, extends or otherwise varies the provisions of the PATRIZIA Supplier Code of Conduct, then the provisions of that contract will prevail, but only to the extent of any conflict.

### Respect for fundamental and human rights

The Human Rights Council stated in its resolution in 2011 that all business enterprises have a responsibility to respect human rights. PATRIZIA has agreed to support and respect internationally recognised human rights in line with the UN Global Compact and consistent with the UN Guiding Principles on Business and Human Rights.

We expect that our business partners will equally respect internationally recognised human rights and conduct their business accordingly. Our business partners must maintain a respectful interaction with their employees and ensure that their employees also treat each other accordingly. Discriminatory conduct must be avoided. The same applies to disadvantage on the grounds of age, gender, ethnic origin, nationality, colour, religion, sexual identity, pregnancy or any other personal characteristic of an employee. Objectionable behaviour or any form of unwanted sexual harassment will equally not be tolerated. Our business partners will ensure that their employees are able to exercise the protected basic rights provided by their employer. This particularly relates to the freedom of association of workers.

### Employee Standards

PATRIZIA requires all suppliers to uphold minimum commitments relating to labour standards. These standards should meet the eight fundamental conventions<sup>3</sup> on labour rights:

1. Freedom of association and protection of the right to organise convention
2. Right to organise and collective bargaining convention
3. Forced labour convention
4. Abolition of forced labour convention
5. Minimum age convention
6. Worst forms of child labour convention
7. Equal remuneration convention
8. Discrimination (employment and occupation) convention

### The Workplace

PATRIZIA requires its suppliers to provide a work environment in which employees do not suffer from harassment, verbal, visual, physical abuse or any conduct that creates an intimidating, offensive or hostile workplace. It is the responsibility of our suppliers to ensure that it only employs people with a legal right to work in that country.

### Health and safety

PATRIZIA is committed to reduce health and safety risks to our employees and contractors which arise from our operations as far as is reasonably practicable. We require our suppliers to comply with all relevant health and safety laws and regulations in all the countries in which they operate and to provide their employees with adequate information and instruction on health and safety matters.

### Wages and Benefits

Our suppliers must comply with all applicable minimum wages, benefits and working hours' standards.

### Modern Slavery Act 2015 (MSA)<sup>4</sup>

PATRIZIA requires its suppliers to comply with the MSA where applicable. The Act is designed to tackle

<sup>3</sup> <https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang-en/index.htm>

<sup>4</sup> [http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga\\_20150030\\_en.pdf](http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_20150030_en.pdf)

slavery and human trafficking. We oppose all forms of slavery and human trafficking and pay particular attention to ensure that these do not occur in our business or supply chains. As a result, PATRIZIA is committed to and has a responsibility for promoting ethical and lawful employment practices. As a result, it will not knowingly use unlawful child labour or forced labour in any of its services that it provides, neither will it accept any products or services from suppliers that employ or use any form of forced, bonded, child or compulsory labour, or other forms of slavery or human trafficking. Service providers are additionally required to take appropriate steps to ensure that there is no form of forced, bonded, child or compulsory labour, or other forms of slavery or human trafficking in their supply chains. This includes providing training to staff on the risks and indicators of slavery or human trafficking and the nature of risks that the business is involved in.

#### Equality, Diversity and Inclusion

We value the diversity of the people and cultures within PATRIZIA. Diversity is critical for our success and part of our business strategy – to be a local partner for our clients. Diversity means for us to provide equal opportunity and to create an inclusive work environment where everyone has the opportunity to succeed. PATRIZIA encourages suppliers to consider equality, diversity and inclusion in their decision making. We require our suppliers to protect their employees from discrimination on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. Additionally we require that the employees of suppliers should be protected from any monetary inequality irrespective of gender. We encourage and promote our suppliers to review the extent of equality, diversity and inclusion within their own supply chain.

### **3. Community Involvement**

PATRIZIA encourages its suppliers to have an active community involvement programme and recognise the social imperatives of the communities in which they operate.

### **4. Compliance and Ethics**

#### Legal compliance

It is fundamental to PATRIZIA that we and our third-party suppliers and contractors comply with all applicable laws and regulation. We expect that our business partners will comply with the currently applicable laws and regulation that you are bound to in connection with the goods or services that you supply to PATRIZIA.

#### Business Ethics

PATRIZIA wants to establish mutually beneficial relationships with suppliers, based on the same high ethical standards of openness, professionalism and honesty that we apply to all our dealings. All employees of the PATRIZIA Group have access to a whistleblowing system to report any concerns.

### Prohibition on bribery and corruption

We expect that our business partners will comply with statutory prohibitions regarding bribery and corruption, as well as competition law. We will in no way tolerate attempts by business partners to inappropriately influence our employees in business dealings through gifts and other benefits. We will also not provide any incentives that could give our business partner the impression that we are receptive to inappropriate gifts or other benefits.

PATRIZIA is committed to conducting business in a manner that complies with the law and is consistent with high ethical standards, including standards intended to prevent bribery and corruption. We are using best endeavours to ensure that our suppliers are aware of and share our commitment to conducting business ethically. Our suppliers are required to not engage in bribery, direct, authorise or knowingly permit any person to engage in bribery, nor take any action or engage in any activity which would lead to any PATRIZIA entity being in breach of any law prohibiting bribery or corruption.

### Money laundering

Our suppliers must refrain from any form of money laundering activities.

### Confidentiality and data protection

PATRIZIA maintains a policy on data protection, based on EU data protection principles, which we follow worldwide. We expect that our business partners:

- protect our information in accordance with good industry practice and comply with all applicable laws and statutory provisions relating to data protection and privacy and will not, by any act or omission, put PATRIZIA in breach of them;
- keep all information which becomes known to them through the course of their business relationship about PATRIZIA strictly confidential and will also ensure the protection of business and operational secrets of PATRIZIA; and
- notify us as soon as they become aware of any unauthorised access, theft, loss or damage, or any other breach of security, in relation to any personal data or confidential information<sup>5</sup> processed by them (or any of their agents, affiliates or subcontractors) on behalf of or disclosed to them by PATRIZIA and provide to PATRIZIA all assistance in investigating the breach.

### Antitrust law and trading regulation

Our suppliers must observe all applicable national and international antitrust laws and trading regulations. Appropriate and necessary preventive measures must be taken.

### Conflicts of interests

Our suppliers must ensure – without being requested to do so – that no conflicts of interest arise between them and PATRIZIA, and if such conflict are discovered, that they are eliminated and reported to PATRIZIA.

<sup>5</sup> Confidential Information means all secret information or information that is by its nature confidential and information provided subject to a duty of confidence, whether belonging to PATRIZIA or entrusted to PATRIZIA by others, and including but not limited to information relating to the people and business of PATRIZIA or of any of its clients.