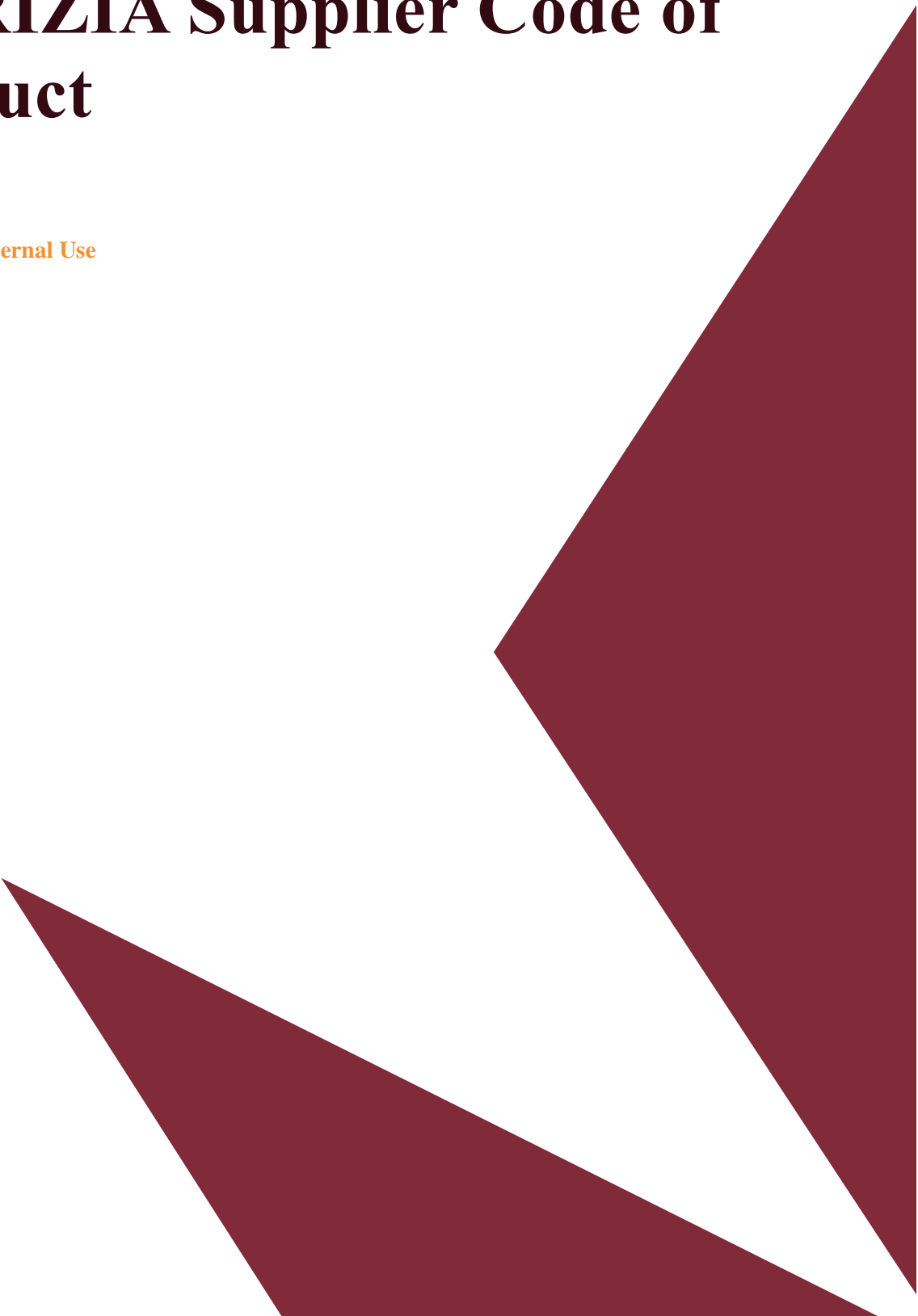


# PATRIZIA Supplier Code of Conduct

For Internal / External Use

19-12-2022



# Document information

## Scope of application

This policy applies to PATRIZIA SE and all legal entities in which PATRIZIA SE directly or indirectly holds more than 50 % of the shares or voting rights (each hereinafter referred to as a 'Company'). This applies also to the extent the Company is held or acting for the account of a special fund or other third parties (and, hence, in particular applies to fund vehicles and real estate special purpose vehicles).

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.

## Policy owner

Central Sustainability Team

## Entry into force

December 2022

## Document history

Version	Date	Author	Changes / Comment	Approved by
1	2020	Anne Boker	First Implementation	
2	2022	Edward Pugh	Minor Amendments	Executive Committee
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# 1. Introduction

PATRIZIA SE and its subsidiaries (hereafter PATRIZIA) are consciously aware of how our business activities can impact society and the environment. We are committed to being a company that conducts business responsibly, ethically, and with integrity, and therefore have policies, processes and controls that reflect our commitment to:

- Protection of the environment;
- Protection of people;
- Community involvement; and
- Governance, compliance and ethics.

To encourage responsible business practices throughout our supply chain, PATRIZIA extends its commitments to its service partners, and strives to treat suppliers fairly, without prejudice and in a collaborative manner.

We wish to only engage with like-minded suppliers and contractors who are committed to similar standards. PATRIZIA therefore requires its third-party suppliers and contractors to confirm – on their own behalf and on behalf of their 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).

We require that our service partners have in place adequate controls to continuously identify, prevent, mitigate, track and account for actual or potential impacts, with respect to the requirements herein, in their own operations and supply chains.

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<sup>1</sup>.

## 2. Protection of the Environment

At PATRIZIA we are acutely aware of how our actions impact the environment. Our strategy is to build resilience by continuously improving our approach to environmental management, including minimising our carbon footprint in line with the long-term temperature goals of the Paris Agreement.

We require our suppliers to consider their impact on the environment and to employ reasonable measures to apply the most environmentally sustainable solutions regarding their products, services, and delivery processes. Suppliers should endeavour to use natural resources in an economical and environmentally responsible manner.

Our suppliers should ensure that they have the necessary processes in place to govern their Representatives accordingly, and to collaborate with PATRIZIA in ensuring the application of its responsible investment principles and sustainability goals.

Our business partners must comply with all statutory provisions relating to environmental protection.

<sup>1</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.

## 3. Protection of People

PATRIZIA insists on behaviours and actions that are consistent with the OECD Guidelines for Multinational Enterprises; the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work; and the International Bill of Human Rights.

### 3.1. Respect for Fundamental and Human Rights

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

We expect that our business partners will also 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 treat each other accordingly. Discriminatory conduct must be avoided and objectionable behaviour or any form of sexual harassment will not be tolerated. Our business partners will ensure that their employees are able to exercise the protected basic rights provided by their employer, including the freedom of association of workers.

### 3.2. Employee Standards

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

- Freedom of association and protection of the right to organise convention
- Right to organise and collective bargaining convention
- Forced labour convention
- Abolition of forced labour convention
- Minimum age convention
- Worst forms of child labour convention
- Equal remuneration convention
- Discrimination (employment and occupation) convention

### 3.3. 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. Suppliers should strive to maximise the health and well-being of their workforce.

### 3.4. Health and Safety

PATRIZIA is committed to minimising health and safety risks to our employees and contractors, arising 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.

### 3.5. Wages and Benefits

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

### 3.6. Modern Slavery

PATRIZIA requires its suppliers to comply with applicable Modern Slavery regulations, which are designed to tackle 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. Accordingly,

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.

### **3.7. Equity, Diversity, and Inclusion**

We value and celebrate the diversity of the people and cultures within PATRIZIA. Diversity is critical for our success and is part of our business strategy – to be a local partner for our clients. Diversity means for us to create an environment where everyone feels included, represented, and valued equitably.

PATRIZIA encourages suppliers to consider equity, diversity, and inclusion in their decision making. We require our suppliers to protect their employees from discriminatory practices, including monetary inequality, based on factors such as, but not limited to, race, gender, age, disability, sexual orientation, religious beliefs, marital status, or pregnancy and maternity.

We encourage our suppliers to review the extent of equity, diversity and inclusion within their own supply chain.

## **4. Community Involvement**

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

## **5. Compliance and Ethics**

### **5.1. 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 they are bound to in connection with the goods or services that they supply to PATRIZIA.

### **5.2. Business Ethics**

PATRIZIA strives 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 regarding malpractice.

### **5.3. 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.

#### **5.4. Money Laundering**

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

#### **5.5. 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.

#### **5.6. Conflicts of Interest**

Our suppliers must notify us of any potential or actual conflicts of interest, ensuring that identified conflicts of interest are eliminated.

#### **5.7. Confidentiality and Data Protection**

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

- Protect our information in accordance with good industry practice – including with an appropriate level of cybersecurity – 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 that becomes known to them about PATRIZIA through the course of their business with PATRIZIA strictly confidential, ensuring the protection of business and operational intellectual property; 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 all necessary assistance in investigating the breach.