

PATRIZIA Supplier Code of Conduct

For Internal / External Use

January 2024



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 2020

Document History

Version	Date	Author	Changes / Comment	Approved by
1	2020	Anne Boker	First Implementation	
2	2022	Edward Pugh	Minor Amendments	Executive Committee
3	2024	Stefan Liebert, Edward Pugh	Minor Amendments for ED&I and decarbonisation	Executive Director

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1 Introduction

PATRIZIA SE¹ (in the following: PATRIZIA) is consciously aware of how our business activities can impact society and the environment. We are committed to being a company that conducts business responsibly and ethically. We believe that the decisions we make today define our stakeholders' lives tomorrow, we therefore have policies, processes and controls that reflect our commitment to:

- Protection of employees and human rights;
- Protection of the environment;
- 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 their own behalf and on behalf of their subsidiaries, employees, authorised representatives and subcontractors (each, a ‘Representative’) – that they will comply with the requirements set out in this code (the PATRIZIA Supplier Code of Conduct)². 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.

2 Protection of Employees and Human Rights

PATRIZIA is committed to building a supply chain that respects and protects the fundamental rights of all workers, championing safe and inclusive work environments that are free from discrimination and harmful practices. Our expectations for our suppliers encompass adherence to human rights principles, fair wages and benefits, provision of safe workplaces, prevention of modern slavery, and promotion of equity, diversity, and inclusion.

2.1 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.

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 ten 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.

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.

¹ 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” and together “PATRIZIA”).

² 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.

2.2 Wages and Benefits

Our suppliers must comply with all applicable minimum wages, benefits (e.g., paid holiday) and working hours' standards.

2.3 Employee Standards

PATRIZIA requires all suppliers to uphold minimum commitments relating to labour standards. These standards should meet the ten fundamental conventions³ 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
- Occupational Safety and Health Convention
- Promotional Framework for Occupational Safety and Health Convention

2.4 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 provide working conditions that foster the health and well-being of their workforce, including physical and mental health.

2.5 Health and Safety

PATRIZIA is committed to reduce 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.

2.6 Modern Slavery⁴

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. 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 in their supply chain. Service providers are expected to enact appropriate measures, including 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.

2.7 Equity, Diversity, and Inclusion

We value and celebrate the diversity of people and cultures within PATRIZIA. To be a preferred local partner for our clients, we strive to create an environment where everyone feels included, represented, and valued

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

⁴ http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_20150030_en.pdf

equitably. This is critical to our success and is part of our business strategy – to be a local partner for our clients.

PATRIZIA encourages suppliers to consider equity, diversity, and inclusion practices. This includes protecting employees from discriminatory practices, including monetary inequality, based on factors such as, but not limited to age, gender, race, ethnicity, disability, sexual orientation, religious beliefs, cultural background, education, life experiences, socio-economic status, marital status and carer responsibilities. It also includes presenting fair and equal opportunities for the advancement of talent, as PATRIZIA seeks to collaborate with a wide range of diverse talent.

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

3 Protection of the Environment

At PATRIZIA, we are acutely aware of how our business activities impact the environment and the earth's natural systems. We strive to continuously improve our approach to environmental management, including by considering environmental factors in our decision-making processes, and encourage the same from suppliers.

We encourage our suppliers to consider the adverse environmental impacts of their products, services, and operations, and to employ reasonable measures to minimise those impacts, such as through resource efficiency, avoidance of pollution, and adoption of circular practices (e.g., recycling).

PATRIZIA is committed to achieving net zero carbon, which includes decarbonising our operations and the purchase of goods and services. Where it is feasible, we request the prioritisation of low carbon alternatives in the provision of goods and services to PATRIZIA. We encourage our business partners to adopt similar goals, and to collaborate with PATRIZIA to drive mutual progress in carbon reduction.

We require that our business partners comply with all statutory provisions relating to environmental protection.

4 Data Protection

4.1 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.
- 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 information⁵ 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.

⁵ 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

4.2 Information Security

PATRIZIA maintains an Information Security Management System (ISMS) according to the international security standard ISO/IEC 27001. The related information security policies define requirements for maintaining an adequate level of security for all types of corporate information with regard to its confidentiality, integrity and availability.

We expect that our business partners:

- protect our data in accordance with good security practices that meet PATRIZIA's internal security levels;
- meet the requirements regarding the confidentiality, integrity and availability of our information;
- comply with all applicable legal and financial regulations regarding the handling of our information;
- notify us as soon as they become aware of a security breach that negatively affects PATRIZIA's security level.

5 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.

6 Compliance and Ethics

6.1 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.

6.2 Business Ethics and Whistleblowing System

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 without fear of retaliation.

6.3 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.

6.4 Prevention of Money Laundering, terrorist financing and sanction breaches

Our suppliers must refrain from any form of money laundering or terrorist financing activities and comply with applicable sanction regimes.

6.5 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.

6.6 Conflicts of Interest

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