



CODE OF CONDUCT PARTNERS

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1. INTRODUCTION¹

Within the Nextensa Group, we believe that a strong commitment to ethical and responsible business practices is an essential part of business operations and a key to success in achieving one's strategy.

This Code of Conduct for business partners and suppliers defines, on the one hand, the minimum standards to which the Nextensa Group commits itself and all its Staff Members and, on the other hand, sets out the expected behaviours that the Nextensa Group imposes on its customers, purchasers and other users of its properties (the **Business Partners**) and on its suppliers, contractors, and other external service providers (the **Suppliers**). Indeed, Nextensa wishes to establish strong partnerships with its Business Partners and Suppliers (together, the **Partners**) based on (mutual) respect, honesty, fairness and integrity.

This code articulates the 'S' (Social) and the 'G' (Governance) of Nextensa's ESG policy towards its Partners. The sustainability objectives and obligations that Nextensa imposes on its Partners, being the 'E' (Environmental) of its ESG policy, can be found, among other things, in the "Green lease" provisions that are included in the agreements with the users (tenants, ...) of its real estate portfolio or in the sustainable procurement policy that forms part of its contracting conditions.

This code of conduct is regularly reviewed and, where necessary, improved and it will continue to be available for consultation on Nextensa's website (www.nextensa.eu).

Questions regarding the application of this code of conduct can be addressed to Nextensa's **Compliance Officer** (legal@nextensa.eu).

¹ For the definitions of capitalised terms in this code, please also refer to the definitions in Nextensa's Corporate Governance Charter (www.nextensa.eu).

2. SCOPE

This Code of Conduct applies to all entities of the Nextensa Group itself, its Partners, including (non-exhaustively) all of its (sub) contractors, (sub)suppliers of goods and services, consultants, workforces, subtenants, etc.

Nextensa hereby expressly requests its Partners' commitment to impose the rules of conduct set out below also on its own suppliers, service providers and work force.

3. ENGAGEMENTS

3.1 Human rights and labour standards

Nextensa wishes to conduct its business in a socially responsible manner, taking on the necessary responsibilities that come with it. As a company, Nextensa subscribes to the internationally accepted human rights as included in the Universal Declaration of Human Rights and pays due attention to health, safety and the environment, in line with its commitment to contribute to a sustainable development.

Compliance with applicable (national and international) laws and regulations, both in letter and spirit, is crucial to Nextensa's business operations. This translates, *inter alia*, into the following areas below :

Compliance with human rights

We expect our Partners to respect human rights and abstain from and, if necessary, contest any complicity in human rights violations or discrimination.

Diversity and inclusion

For Nextensa, diversity and inclusion is an integral part of its corporate culture as a key to success and innovation, and it makes every effort to make this a reality within its own teams. Nextensa aims to create a working environment where diversity in all its forms - be it gender, age, ethnicity or cultural background, as well as personality, skills, expertise and opinions - is embraced and where all Staff Members are given equal opportunities, where mutual respect and a spirit of cooperation prevails.

Given the importance of this, we ask our Partners to create a similar positive working environment that guarantees openness, respect and equality. Partners must maintain a general prohibition against any form of discrimination based on race, ethnicity, nationality, colour, age, gender, gender identity, sexual orientation, disability, marital status, political views and/or religion.

Freedom of association and recognition of the right to collective bargaining

Employees of the Partners should, always in accordance with applicable national laws, have the right to join a trade union or any workers' organisation of their choice and to attend and participate in collective bargaining.

Mutual respect and prohibition of any form of harassment

We expect everyone to treat each other in a professional manner based on mutual respect, trust and individual dignity.

Partners are obliged to provide working conditions that are free from harassment, abuse and violence, including sexual harassment, corporal punishment, inhuman treatment or threats thereof in any form in the workplace.

The ban on all forms of forced and child labour

Partners should oppose any form of forced labour and take all necessary measures so that there will be no form of forced labour in the performance of its activities.

Partners will take all necessary and effective actions to ensure the prohibition of child labour within their organisation and, to the extent possible, also ensure compliance with this prohibition throughout the supply chain.

Appropriate wage and working hours

The work of the Partners' employees should be carried out on the basis of recognised employment relationships and within working hours that comply with applicable laws and regulations.

Partners pay their employees according to applicable wage laws, including in terms of minimum wages, overtime payments and mandatory compensation benefits.

3.2 Health and safety

We expect our Partners to comply with all applicable laws relating to employee welfare, safety and health and to take a proactive attitude in this regard by drawing up and implementing both a health and safety policy and the necessary safety systems and training in order to prevent accidents.

Appropriate precautions should be taken to protect workers and visitors from dust, chemicals or other nuisances during development or renovation works.

3.3 Business ethics and transparency

Acting ethically is not only about complying with the formal laws and regulations applicable to our business activity. It is also about adhering to high standards of quality, transparency, fairness and personal integrity, which should enable us to make informed and objective business decisions and avoid violations of laws and company guidelines, whether deliberate or not.

Business integrity and fair competition

Partners are committed to an open and honest culture of trust and integrity. Partners will therefore communicate clear, accurate and truthful information to their stakeholders and to Nextensa.

Partners comply with all applicable competition laws, adopt fair business practices and do not engage in any activities that could be classified as impeding or violating these competition laws.

Prohibition of corruption and bribery

Nextensa prohibits all forms of bribery and other forms of corruption and fraud. These acts have a negative impact on the company's reputation and credibility and thus harm its long-term growth potential. Corruption can be defined as proposing, granting or requesting, accepting a particular benefit, in order, within the scope of his/her function, to adopt or not to adopt a well-defined behaviour.

Partners are expected to comply with Nextensa's policies around corporate gifts and hospitality, as set out in the Code of Conduct applicable to Members of Staff, which can be accessed at www.nextensa.eu.

Preventing conflicts of interest

Transactions between Partners and Nextensa Group must be conducted without (any appearance of) conflicts of interest. If Partners (or any of their employees) are faced with a potential conflict of interest with Nextensa due to a personal connection, such Partner must immediately inform its contact person or any other senior person within Nextensa and refrain from any contacts with Nextensa until such conflict of interest has been assessed and resolved.

Privacy and confidentiality

The Partners respect the privacy and confidentiality of information of Nextensa and its Staff Members.

Partners will ensure that a conclusive, professional security policy is implemented within their organisation, regularly monitored and continuously updated.

Partners process personal data in accordance with applicable data protection laws and regulations (GDPR).

4. MONITORING AND ENFORCEMENT OF THIS CODE OF CONDUCT

Breach notifications

Nextensa does not tolerate behaviour that is illegal, unethical or contrary to human rights. Everyone is encouraged to raise ethical and professional issues.

Partners are encouraged to establish appropriate reporting mechanisms within their organisation to enable their employees and other stakeholders to raise concerns about possible illegal or unethical behaviour within the organisation and/or business activities of the Partners without fear of retaliation.

If concerns arise in relation to this Code or its application, any person may report it directly to their Nextensa contact, another manager or, if necessary, the Compliance Officer of the Nextensa Group. All reports will be adequately assessed and appropriate action will be taken in case of violations.

Enforcement

Nextensa reserves the right to verify whether its Partners' compliance with the minimum principles set out in this Code.

If Nextensa determines that a Partner has violated this Code, it may require the Partner to take corrective action and provide appropriate supporting evidence to demonstrate the requested correction. Nextensa also reserves the right to suspend or terminate a relationship with a Partner for serious or repeated breach of the requirements of this Code.



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