



CODE OF CONDUCT



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Purpose

Olivia Centre, belonging to the Tonsa Commercial REI N.V. capital group, is committed to complying with the highest market standards of social and environmental responsibility, including in particular standards consistent with the UN Sustainable Development Goals and the universal principles of the United Nations Global Compact.

This Code of Conduct has been prepared not only to certify our values, but also to provide clear and explicit guidance to all entities cooperating with us regarding expectations towards them in the course of cooperation. It contains a set of principles that reflect our practices, focusing on four main areas representing general, business, social and environmental expectations.

As a conscious organization, we expect everyone cooperating with us to comply with at least the principles set out in this document. When selecting our business partners, we are guided, among others, by the values specified in this Code are implemented, respected, or shared by them, while reserving the right to verify the above.

This document is addressed to employees and associates of Olivia Centre and everyone that is, or will be related to Olivia Centre by a legal or factual relationship – Residents, contractors, clients, suppliers, service providers, capital providers or others – hereinafter jointly referred to as Partners.

Whenever this document refers to legal provisions, it is understood as the provisions currently in force in the territory of the Republic of Poland – the country where Olivia Centre operates.

General expectations

We expect our Partners to comply with the standards and laws in force in Poland, in particular:

- the terms of use of the environment and the law in this regard;
- the UN Universal Declaration of Human Rights;
- the International Labour Organization (ILO);
- the Labour Code;
- the Act on combating unfair competition;
- the Act on counteracting money laundering and financing of terrorism

and other legal acts concerning the above issues.

In the event of any discrepancies between individual regulations, we expect Partners to apply regulations that are more beneficial to the environment, employees and co-workers, and the community affected.



Business expectations

Ethics

Partners should act in a fair, transparent manner and in accordance with generally accepted ethical principles, manifested in particular in:

- awareness of the impact of the business activity on the environment, therefore each decision requires appropriate social and environmental analysis;
- taking responsibility for internal and external activities and impacts on business, environment, and society;
- transparency, because every decision that affects the environment or the community should be notified to stakeholders, at the same time providing them with all necessary information in this regard;
- honesty, guided by the values expressed in this document or similar to them.

Responsible marketing

We expect Partners to act in accordance with the best market practices in the field of marketing. Each Partner should strive to ensure that its promotional activities are guided by the principles of ethics, honesty, and reliability, which should be understood as:

- offering legally compliant products or services;
- basing advertising content on true and reliable information;
- carrying out marketing activities free from such content as: hatred, violence, pornographic content, offensive behavior;
- including in marketing content information that is not misleading as to: quality, purpose, origin, message, price, location, or other relevant information determining the choice of the object or service by potential buyers;
- providing reliable information on the environmental and social impact of its products or services;
- avoiding any practices that take advantage of the lack of knowledge and choice by potential buyers.

Counteracting corruption, money laundering and financing terrorism

We expect Partners to counteract all forms of corruption, fraud, and extortion by conducting a policy of counteracting money laundering and terrorist financing, and also by:



- maintaining full and legal documentation of all transactions in order to ensure transparency of financial flows;
- not succumbing to economic blackmail;
- obtaining financing from verified sources;
- expressing firm opposition in response to immoral financial proposals and unfair market practices;
- preventing cooperation with entities subject to economic sanctions or using unfair market practices.

The above-mentioned standards make up the foundations of functioning in the matter of running a business and finances. Each of the above rules is as important as the other and cannot be treated separately from the other rules.

In addition, when cooperating with contractors, Partners should, in justified cases, verify business partners, also in terms of counteracting money laundering and terrorist financing (AML) and maintain impartiality and transparency in business relations. However, in some situations, business courtesies are allowed, i.e. gifts in the form of non-monetary money, which have a modest value and do not go beyond the applicable customs. Business courtesies must not influence the recipient's decisions or cause embarrassment or obligation.

Protection of privacy, personal data and copyright

Partners should protect the privacy of Olivia Centre and its Residents, clients, contractors, and other entities with whom they cooperate, as well as protect the secrets of their business and all data, in particular confidential, classified and secret information to which they gained access in the course of cooperation with Olivia Centre. Privacy protection means protection against disclosure of any information, knowledge, know-how, assumptions, correspondence, data, and other materials in any form to third parties.

We also expect Partners to comply with the law on the protection of personal data of employees, co-workers and persons associated with Olivia Centre, about which they have obtained information as a result of the performance of their duties, in particular those covered by the General Data Protection Regulation (GDPR).

In addition, the Partners should observe and respect all copyright and related rights related to Olivia Centre.

Competitive activities and conflicts of interest

Partners' activities should comply with the principles of fair competition and all applicable antitrust laws. Partners may not undertake activities that may expose Olivia Centre to harm



as a consequence of conducting unfair competitive activity. In particular, we expect the Partners to undertake not to use any information obtained during cooperation in order to take actions discrediting Olivia Centre and all its associates and Partners and to obtain direct or indirect financial benefits on this account.

Social expectations

Human rights

We expect our Partners to respect human rights, both those resulting from the law of the country from which it originates and operates, as well as those adopted at the international level, primarily in the form of the Universal Declaration of Human Rights of the United Nations.

Combating forced labour and slavery

Partners should not use, directly or indirectly, physical, psychological, or economic extortion in order to recruit people to work and carry out the tasks assigned to them. It is unacceptable to use the work of any persons i.e. without their voluntary consent.

In the event of becoming aware of forced labor, slavery, or potential human trafficking, we expect Partners to immediately counteract such activity and notify the relevant state and international authorities.

Protection of young people and prohibition of child labour

When hiring an employee under the age of 18, we expect Partners to:

- not employ persons under 15 years of age (subject to exceptions resulting from legal provisions).
- comply with all regulations regarding the time and hours of work of juvenile workers;
- not limiting the possibility of education for juvenile workers,
- not allowing juvenile workers to do any forbidden work unless it is permissible under the law and under the conditions indicated in these regulations.

Freedom of association

Partners should:

- respect the right of employees and co-workers to free association, especially if their purpose is to represent their interests;



- honour the voluntary association of representatives of employees and co-workers and their selection in free and public elections;
- treat as unacceptable any form of discouragement and obstruction of employees and co-workers from exercising their rights to free association.

Equality, diversity and non-discrimination

Ensuring equal treatment of all employees and co-workers regardless of age, gender, race, origin, level of fitness, social affiliation, religion, views, sexual orientation should be one of the basic principles implemented in the business practice of Partners.

Partners should:

- ensure active action to combat and prevent discrimination;
- treat all employees and co-workers with respect and understanding;
- actively support the fight against the use of physical or psychological violence, as well as behaviors of a sexual nature and subtext.

We expect that the Partners will not discriminate financially against people because of age, gender, race, origin, level of fitness, social affiliation, religion, views, sexual orientation, and will determine the amount of remuneration based on factors such as knowledge, experience and scope of responsibilities.

Health and safety

Partners should show the utmost care for the health and safety of employees and co-workers and comply with applicable standards and legal regulations, in particular:

- prevent accidents at work and occupational diseases;
- minimize hazards at workplaces;
- implement safe working techniques;
- ensure continuous training and improvement of skills of employees and co-workers in order to avoid situations threatening the health or life of co-workers.

Environmental expectations

Environmental and climate protection

We encourage Partners to act in accordance with the laws, regulations, administrative practices, and good practices related to environmental protection applicable both in the countries of operation and at the international level. We require Partners to have valid



permits, concessions, and environmental decisions for their operations and to act in accordance with their provisions.

Emissions

We encourage Partners to:

- take all precautions to prevent contamination of air, soil, surface water and groundwater;
- monitor and optimize emissions of pollutants related to the conducted activity, including minimizing the amount of greenhouse gas emissions into the atmosphere;
- order materials first from local suppliers in order to minimize pollutant emissions;
- strive to use all technological achievements to reduce its negative impact on the environment, as part of the rational management of the company's resources.

Resources

We encourage Partners to:

- monitor the consumption of energy, water, fuels and other resources;
- rationally manage all resources and reduce their consumption;
- minimize negative impact on the environment;
- use only materials from legal sources;
- prioritize the use of recycled, reusable, responsibly sourced, non-toxic, third-party certified materials (e.g. CE, ISO 14001, EPD, FSC, PEFC and other identical), durable and degradable;
- document the list of resources used to implement the contract concluded with Olivia Centre in a form agreed individually between the parties;
- monitor the carbon footprint related to the implementation of contracts concluded with Olivia Centre and keep records in accordance with provisions agreed individually.

Waste

Partners should:

- comply with the law related to waste management;
- minimize waste generation and strive to reuse it;
- properly store waste and consciously and responsibly segregate and dispose of it;
- document the list of waste generated in cooperation with Olivia Centre, in accordance with the provisions agreed individually between the parties.



Reporting comments and violations

We encourage you to report incidents of concerns and violations of the Code of Conduct by sending a message describing the violation or comment to the following address:

Code of Conduct
Olivia Centre
Al. Grunwaldzka 472C
Olivia Star (3rd floor)
80-309 Gdansk
esg@oliviacentre.com

We provide anonymity to all reporters.

Application of the Code of Conduct

We recommend Partners to comply with and promote the principles set out in this document throughout your entire value chain, including with your suppliers, service providers, subcontractors, and contractors.

In the event of non-compliance with the terms of this Code, corrective action should be taken immediately to remedy the non-compliance and appropriate measures should be taken to avoid similar problems in the future.

This Code of Conduct is subject to change. Information about the version of the document and the date of approval by the Management Board and the date of entry into force of the document is presented below.



Document version

v. 1.0

Date of approval by the Management Board

9th August 2023

Effective date

1st September 2023

Management Board of Tonsa Commercial REI N.V.

Maciej Grabski
Markus Josef Leininger
David Luksenburg
Jeroen Edwin Missaar



**The document
was signed
with a qualified
electronic signature**

