

CPI PROPERTY GROUP CODE OF CONDUCT FOR SUPPLIERS



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1. INTRODUCTION

- 1.1 The Group operates its business in several European countries and always complies with applicable laws and the Group's Code of Business Ethics and Conduct and other Group's internal rules.
- 1.2 The Group endeavours to build a partnership with the Suppliers that operates in a manner consistent with the Group's values including ethical, social and environmental aspects. Therefore, the purpose of this Code is, in connection and compliance with the Group's Code of Business Ethics and Conduct and other Group's internal rules, to express that the Group places the same ethical, social and environmental requirements on the Suppliers as on itself and its own Representatives, and to set out the main principles that the Group expects to be maintained by the Suppliers.

2. APPLICABILITY

- 2.1 This Code applies to, and shall be observed by, all Suppliers and their employees, officers, directors, partners and other representatives.
- 2.2 The prior written approval of the Board of Directors of CPI Property Group S.A. is required for any deviation from this Code, provided that such deviation would not breach any applicable laws.

3. DEFINITIONS

- 3.1 Unless in this Code stated expressly otherwise or unless the context requires otherwise, the capitalized terms used in this Code shall have the meaning ascribed to them in this Section 3.1 of this Code:
 - 3.1.1 **"Code"** means this CPI Property Group Code of Conduct for Suppliers;
 - 3.1.2 **"Group"** means CPI Property Group S.A. and its subsidiaries;
 - 3.1.3 **"Representative"** means any officer, director, employee or anyone other directly engaged with, and authorized to act on behalf of, the Group, and **"Representatives"** shall be construed accordingly; and
 - 3.1.4 **"Supplier"** means any supplier of goods and services of the Group and its subsidiaries, including their employees, officers, directors, partners and other representatives, and **"Suppliers"** shall be construed accordingly.

4. MANAGEMENT RESPONSIBILITIES

- 4.1 The overall responsibility for the pursuing of this Code rests with the Board of Directors of CPI Property Group S.A. that acts through the Compliance Officer of the Group. The Compliance Officer of the Group reports to the Board of Directors of CPI Property Group S.A. on a regular basis.

5. SUPPLIER'S COMPLIANCE

- 5.1 The Suppliers shall maintain a full compliance with applicable laws, as well as hold and keep valid all the required permits, registration and licenses necessary for their business operations. The requirement for the Suppliers to comply with applicable laws should be incorporated in the Group's agreements with the Suppliers.
- 5.2 The Suppliers shall ensure that all their employees, officers, directors, partners and other

representatives comply with applicable laws and the principles and standards set forth in this Code.

- 5.3 The Suppliers shall understand that a proper action may be taken against those who do not comply with applicable laws and the principles and standards set forth in this Code. In case of serious breach of this Code, even the contractual relationship between the Group and the respective Supplier may be affected.
- 5.4 The Group is committed to communicate this Code to all Suppliers so they are aware of their respective obligations. The Group is also committed to carry out the annual surveys of the Suppliers' compliance with their obligations under this Code.

6. BUSINESS ETHICS

- 6.1 The Suppliers' business operations shall be characterized by the high business ethics, honesty and responsibility. The Suppliers shall always act ethically and professionally and comply with applicable laws while conducting the business, which means, among others:
 - 6.1.1 to comply with applicable laws on prohibition and prevention of bribery, corruption and frauds, as well as with the principles set out in the Group's Anti-Corruption, Anti-Bribery and Countering of Frauds Policy (including non-providing any gifts or entertainment to the Representatives to gain improper advantage or preferred treatment);
 - 6.1.2 to comply with applicable laws on fair competition, whereas the Suppliers shall avoid any type of price collusion, cartel agreements or abuse of dominance; and
 - 6.1.3 to comply with applicable laws on prohibition and prevention of money laundering and terrorist financing, as well as with the principles set out in the Group's Anti-Money Laundering and Counter-Terrorist Financing Policy.

7. HUMAN RIGHTS

- 7.1 The Suppliers shall respect and promote recognized human rights, including appropriate labour conditions and practices, and not cause, contribute to, or be linked with, a negative impact on human rights in the work place or in relation to their business operations.

8. WORKING CONDITIONS

8.1 Non-Discrimination

- 8.1.1 The Suppliers shall treat their existing and prospective employees, officers, directors, partners and other representatives fairly, based only on factors related to the Suppliers' legitimate business interests, and without regard to race, ethnicity, religion, gender, gender identity or expression, sexual orientation, national origin, political views, age, marital status, disability or any other personal characteristic.
- 8.1.2 The Suppliers shall ensure that harassment, bullying, intimidation or other degrading treatment does not occur within their business operations.

8.2 Salary

- 8.2.1 Salaries shall be paid directly to the Suppliers' employees at the stipulated time and in full. The statutory national minimum wage shall be the lowest acceptable salary level.

8.3 **Work Time**

8.3.1 All Suppliers' employees shall be entitled to statutory leave, including sickness and parental leave. Working hours, including overtime, may not exceed the maximum working hours given by applicable laws. All Suppliers' employees shall be also entitled to statutory weekly rest given by applicable laws.

8.4 **No Child Labour**

8.4.1 The Suppliers shall ensure that child labour is not used in any way within their business operations.

8.4.2 The Suppliers shall never employ minors under age of 15 or those who are under any other applicable statutory age. Employment of minors under age of 18 is only possible after they have finished compulsory schooling or if the simultaneous employment does not prevent them to continue in, and finish, the compulsory schooling. However, such employment may never include any hazardous tasks.

8.5 **No Forced Labour**

8.5.1 All work for the Suppliers shall take place voluntarily. The Suppliers shall not be in any way linked to the use of compulsory or forced labour.

8.5.2 The Suppliers shall also comply with applicable laws prohibiting human trafficking.

8.6 **Health and Safety**

8.6.1 The Suppliers are obliged to provide a safe and healthy workplace to their employees, officers, directors, partners and other representatives, including appropriate information, instruction, training and supervision. In this respect, the Suppliers shall implement adequate health and safety standards.

8.7 **Whistle-blowing Program**

8.7.1 The Group expects that all Suppliers provide their employees with access to adequate reporting channels to raise concerns about any legal or ethical issues related to the Suppliers' business operations, including, but not limited to:

- (a) Conduct, which is an offence or breach of applicable laws;
- (b) alleged miscarriage of justice;
- (c) health and safety risks;
- (d) unauthorized use of public funds;
- (e) possible fraud and corruption;
- (f) sexual, physical or verbal abuse;
- (g) bullying or intimidation of employees, customers or service users;
- (h) abuse of authority; and
- (i) other illegal or non-ethical conduct.

8.7.2 The Suppliers shall promptly investigate any such concern raised through the whistle-blowing program. The Suppliers are also obliged to protect the whistle-blower during and after the investigation process.

8.8 **Freedom of Association**

8.8.1 The Suppliers shall respect the rights of employees to organize themselves through labour unions, as well as their right to bargain collectively, without any fear of

punishment, intimidation or harassment.

8.9 Other Issues

8.9.1 The Suppliers shall make sure that any type of relationship that bears the hallmarks of employment is performed in an employment relationship compliant with applicable laws.

8.9.2 Employment of foreigners must always comply with immigration and other applicable laws governing employment of foreigners.

9. ENVIRONMENT

9.1 The Suppliers shall manage environmental risks and impacts associated with their business operations and across their supply chain, including, but not limited to:

9.1.1 compliance with applicable environmental laws;

9.1.2 implementation of strategies aimed at enhancing energy efficiency, improving water management and reduction of waste; and

9.1.3 endeavour to use materials that are recycled or reused, have low embodied energy and reduce resources consumption.

9.2 The Suppliers shall systematically and continuously work to improve their environmental performance.

10. FINAL PROVISIONS

10.1 The Board of Directors of CPI Property Group S.A. shall regularly revisit and reevaluate this Code in light of development of the Group's business and applicable laws.

10.2 This Code was approved by the Board of Directors of CPI Property Group S.A. on 13 February 2019.