

**CPI PROPERTY GROUP CODE OF CONDUCT FOR TENANTS**



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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 Tenants 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 ensure that the Tenants share with the Group the ethical, social and environmental values, and that they understand the importance of the sustainable business operation.

## **2. APPLICABILITY**

- 2.1 This Code applies to, and shall be observed by, all Tenants 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 Tenants;
  - 3.1.2 "**Group**" means CPI Property Group S.A. and its subsidiaries;
  - 3.1.3 "**Premises**" mean any premises owned by the Group and leased to the Tenants on contractual basis;
  - 3.1.4 "**Tenant**" means any entity, which occupies the Premises for purpose of its business operation and its subsidiaries, including their employees, officers, directors, partners and other representatives, and "**Tenants**" 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. TENANTS' COMPLIANCE**

- 5.1 The Tenants 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.
- 5.2 The Tenants 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 Tenants 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 Tenant may be affected.

- 5.4 The Group is committed to communicate this Code to all Tenants so they are aware of their respective obligations. The Group is also committed to carry out the annual surveys of the Tenants' satisfaction.

## **6. BUSINESS ETHICS**

- 6.1 The Tenants' business operations shall be characterized by the high business ethics, honesty and responsibility. The Tenants 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;
- 6.1.2 to comply with applicable laws on fair competition, whereas the Tenants 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 Tenants 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 Tenants shall not discriminate in dealings with their current or prospective employees, clients or other business partners. Everyone shall have an equal access to the employment by, cooperation with, or services of, the Tenants, and shall be treated equally 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 Tenants 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 Tenants' 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 Tenants' 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 Tenants' employees shall be also entitled to statutory weekly rest given by applicable laws.

#### **8.4 No Child Labour**

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

8.4.2 The Tenants 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 Tenants shall take place voluntarily. The Tenants shall not be in any way linked to the use of compulsory or forced labour.

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

#### **8.6 Health and Safety**

8.6.1 The Tenants 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 Tenants shall implement adequate health and safety standards and ensure that all the Premises are safe for their employees, officers, directors, partners and other representatives. This means that the Tenants shall, among others, ensure that:

- (a) the instructions for fire safety are communicated and followed;
- (b) all gas and electrical appliances are used only in a manner for which they were designed;
- (c) fire doors are kept closed and not wedged open;
- (d) there are no obstructions in any stairways, landings and passageways, which provide a route of escape in case of fire; and
- (e) no appliances or equipment provided for fire safety is removed or made non-functioning.

8.6.2 Where a burglar alarm is installed, details of the person appointed as emergency contact shall be registered with the police and local authorities.

#### **8.7 Other Issues**

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

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

### **9. ENVIRONMENT**

9.1 The Tenants shall manage environmental risks and impacts associated with their business operation 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 Tenants 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.