



SUPPLIER CODE OF CONDUCT



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I. INTRODUCTION

Cofinimmo expects its suppliers to undertake to respect the principles and standards set out in this code. By supplier is meant any supplier, seller and service provider, advisor, agent, etc.

Cofinimmo's ESG commitments are covered and elaborated in its ESG Policy, to which it is referred in full. Through its own codes and policies, Cofinimmo imposes ESG standards that are at least as stringent as those referred to in this code.

Cofinimmo expects its suppliers to undertake to do everything in their power to comply with the commitments outlined.

II. PRINCIPLES

1. Compliance and control

Cofinimmo expects its suppliers to undertake to do everything in their power to comply with the commitments outlined. It is their responsibility to bring this code to the attention of their employees, collaborators, managers and own subcontractors, and to make their best efforts to ensure they also comply with it. Transparency is essential for Cofinimmo. Each supplier must make every effort to provide the information necessary for the traceability of its products and services, from the first link in the chain. To do this, it is vital that they obtain equivalent commitments from their own subcontractors.

In the event of non-compliance or misunderstanding of this code, Cofinimmo will invite the supplier concerned to implement the necessary corrective measures to remedy the situation as soon as possible.

If the breach nevertheless persists, Cofinimmo reserves the right to terminate commercial relations with the supplier concerned, the latter being at fault, and without prejudice to any other damages and interest that Cofinimmo may claim.

It is the responsibility of the suppliers to put in place the internal procedures necessary to monitor compliance with this code, both by their managers and employees and their own subcontractors, suppliers and

service providers. In order to demonstrate compliance with this code, suppliers agree to provide Cofinimmo, at its first request, with the information justifying this. To this end, suppliers agree to respond to a questionnaire that Cofinimmo may submit to them if they do not demonstrate they have recognised certification proving compliance with this code.

Suppliers will make every effort to identify areas for improvement that may be identified as part of their assessment if they have certification, or, otherwise, by Cofinimmo.

Cofinimmo also recognises the ESG assessment drawn up by EcoVadis as sufficient to justify compliance with this code, provided that suppliers demonstrate at least one bronze medal. Unless they demonstrate a platinum medal, suppliers undertake to make every effort to identify any areas for improvement identified as part of their assessment.

2. Applicable legislation

Cofinimmo expects suppliers to comply with national and international legislation applicable to them in terms of the environment, human rights and labour and business ethics, the standards established by the United Nations and its various bodies (and more specifically the standards of the International Labour Organization (ILO), the Universal Declaration of Human

Rights and the guiding principles of the United Nations Global Compact). In the event of a contradiction between the different standards or between the stand-

ards and this code, the most binding standards shall prevail. Cofinimmo expects its suppliers to impose the same requirements on their own subcontractors.

III. COMMITMENTS

1. Environment

The guiding principles of Cofinimmo's environmental policy are in line with the guiding principles of the United Nations Global Compact for the Environment. Cofinimmo considers that the principles mentioned above are essential and works to apply them throughout its value chain.

Cofinimmo applies the precautionary principle in environmental matters, which means that *"the absence of absolute scientific certainty must not be cited as a reason to postpone cost-effective measures aimed at preventing environmental degradation"* (United Nations Global Compact, seventh principle: Environment).

Cofinimmo expects its suppliers to adhere to these principles and impose the same requirements on their own subcontractors.

More specifically, Cofinimmo expects its suppliers to:

a. Focus on resilience to climate change (and greenhouse gas emissions) through mitigation and adaptation

Suppliers shall make every effort to ensure that their activities and strategy are consistent with the transition to a sustainable economy and meet the objectives of the Paris Agreement.

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b. Preserve natural resources and biodiversity

Suppliers shall make every effort to protect the environment by:

- preventing pollution and preserving biodiversity through ecological technologies and the systemic approach,
- minimising the release of pollutants into the environment, the creation of waste and the depletion of resources,
- reducing water consumption and promoting a circular approach to water management, in where other resources such as rainwater or wastewater can be reused.

c. Apply circularity principles in all their activities

Cofinimmo expects its suppliers to apply the principles of circularity in all their activities. Waste must be minimised and materials reused, including ICT¹ materials. Furniture and site waste must be reintroduced into the system to ensure a positive environmental and social impact.

1 Information and Communication Technologies.



2. Human and labour rights

Suppliers shall refrain from infringing human rights. They confirm that they do not violate them and that the following standards will be protected and respected at all times. These are minimum standards.

a. Non-discrimination, diversity and inclusion

Suppliers shall refrain from any form of discrimination, both direct and indirect. They undertake not to discriminate between people on the basis of age, gender, religious belief, political opinion, sexual orientation, social or ethnic origin, disability, family status, nationality, surname or physical appearance.

They will make all reasonable arrangements for access to their premises and workstations to promote the success and well-being of employees with reduced mobility.

b. Prohibition of forced labour

Any form of forced or compulsory labour is strictly prohibited. Suppliers shall refrain from using any form of intimidation to force anyone to enter into any kind of relationship with them. It is also forbidden to force anyone to continue the employment relationship by withholding pay, benefits, goods or documents.

c. Prohibition of child labour

Suppliers shall comply with the minimum legal age for admission to employment, regardless of the country in which they operate.

d. Freedom of association and collective bargaining

Suppliers shall respect their employees' right to free association. Suppliers shall support employees who wish to stand for social election and shall not discriminate, pressure, threaten or abuse members of workers' organisations or trade unions.

e. Health and safety

Cofinimmo expects its suppliers to comply with the applicable laws, regulations and standards in the field of health and safety.

f. Working conditions

Suppliers are responsible for complying with applicable regulations relating to remuneration, salary protection, social benefits and working hours.

Cofinimmo attaches particular importance to the safety of its subcontractors' staff. Cofinimmo invites its suppliers, who undertake to do so, to provide a safe and healthy workplace in order to prevent accidents and damage to health arising from, related to or occurring in the course of work. Suppliers undertake to ensure at all times that their activities do not harm the health and safety of their employees, their own subcontractors and the latter's employees, and anyone else present on the site. They undertake to put in place the sanitary measures that would be imposed on companies, particularly in the event of an epidemic. It is also mandatory to register workers on site.

g. Prohibition of all forms of harassment, threat and abuse

Suppliers must refrain from any form of harassment and violence at work. Discriminatory practices, homophobic, xenophobic or racist remarks, mental or physical cruelty, bullying or sexual harassment, gestures and/or behaviour of a sexual, coercive, threatening or abusive nature, and in general any act in which a worker or another person is persecuted,

Cofinimmo expects its suppliers to comply with the applicable laws, regulations and standards in the field of health and safety.

threatened, abused or physically or psychologically assaulted, whether internally or vis-à-vis external contacts, are prohibited and will be the subject of sanctions.

h. Whistleblowing

Suppliers are responsible for putting in place policies and procedures for reporting of irregularities (whistleblowing).

3. Business ethics

Cofinimmo is particularly vigilant to the fight against corruption, fraud and money laundering.

Cofinimmo naturally complies with the highest ethical and moral standards in the conduct of its activities, and with regard to its stakeholders. It obviously condemns any dubious or legally punishable practice (corruption, money laundering, illegal employment, social dumping, etc.). It expects similar commitments from its suppliers.

Cofinimmo expects suppliers to respect the Anti-corruption, Fraud and Money Laundering Policy established by Cofinimmo, to which reference is made in full. The suppliers also confirm compliance with applicable laws and regulations on business ethics.

This specifically includes:

a. The fight against corruption

Cofinimmo insists on the principles of honesty, integrity and fairness in all areas and expects a similar attitude from its suppliers.

Direct or indirect offers, requests for or acceptance of direct or covert advantages, in whatever form or intention, are unacceptable practices. Suppliers are aware that corruption can take various forms. Likewise, they undertake not to offer or give items of value or sums of money, whatever the amount, to an elected representative or official of the State or of any public authority, whether Belgian or foreign, in order to obtain any advantage, or to obtain exemptions from, evasion of, and/or violations of laws, regulations, directives, agreements, or in any other manner.

b. The fight against fraud, money laundering and financing terrorism

Cofinimmo expects its suppliers to comply with the applicable laws and regulations on the fight against fraud, money laundering and the financing of terrorism. They shall refrain from business relations with third parties whose behaviour makes them suspect of being involved in such activities without having checked this risk beforehand.

c. The fight against conflicts of interest

Suppliers will inform Cofinimmo of any situation which might appear to be a conflict of interest between them and Cofinimmo, including that concerning a Cofinimmo employee². By conflict of interest is meant a direct or indirect conflict, of a financial or other nature.

d. The fight against unfair competition

Cofinimmo expects its suppliers to behave fairly towards their competitors and to refrain from any anti-competitive practice (abuse of dominant position, cartel, etc.), in compliance with applicable laws and regulations.

² The term "employee" includes Cofinimmo employees, its managers and, more generally, persons who have delegated powers to represent the company.



e. Protection of personal data

Cofinimmo expects its suppliers to comply with the regulations relating to the protection of personal data, and in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.04.2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation - GDPR).

f. Respect for confidentiality

It is the responsibility of the suppliers to not disclose to any third party sensitive and/or confidential information transmitted by Cofinimmo, even after the end of the business relationship. The suppliers confirm that they are not subject to any economic, financial or commercial sanctions, including those imposed, promulgated, administered or applied by the European Union (or one of its Member States), the United Nations or the North Atlantic Treaty Organisation. Cofinimmo expects its suppliers to obtain similar commitments from their own subcontractors.

IV. MISCELLANEOUS

a. Notification and contact

The Supplier Code of Conduct forms part of and relates to the ESG Policy.

Any question, violation or concern relating to the Supplier Code of Conduct and the ESG Policy can be sent to the compliance officer at the following email address: compliance@cofinimmo.be.

b. Compliance control process within Cofinimmo

Compliance with the Supplier Code of Conduct is monitored by the Audit Committee, to which the compliance officer reports on a regular basis.