



VENDOR CODE OF CONDUCT

Introduction

EQT Exeter is among the largest real estate investment managers in the world, focused on acquiring, developing, leasing, and managing logistics/industrial, office, life science and residential properties from over 40 regional offices across the Americas, Europe, and the Asia-Pacific region.

Scope

This Vendor Code of Conduct codifies our requirements of our construction and property management vendors in the areas of:

- Business Ethics
 - Human and Labor Rights
 - Health & Wellbeing
 - Community Value
 - Environmental Priorities
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EQT Exeter's Approach to Environmental, Social, and Governance Issues

Applying an ESG lens to the management of our investments is an important part of EQT Exeter's value creation thesis.

EQT Exeter seeks to understand the environmental impacts of our operations, improve upon them, and innovate methods to create long-lasting positive and regenerative outcomes, across topics including carbon, energy, water, waste, building materials, biodiversity, and climate change.

EQT Exeter also recognizes the impact that the built environment has on our tenants and residents, local communities, suppliers and society. The issues most relevant and important to us and our stakeholders include the health, wellbeing, and productivity of tenants and residents; labor and human rights in supply chains; diversity & inclusion; the generation of economic and social benefits for local community, businesses, and supply chains; and sustainable place-making when designing new residential and mixed-use communities. We also seek the highest standards of health and safety from those operating on our construction sites and seek to ensure that our standing investments are maintained in accordance with all applicable health and safety regulations.

In order to deliver on these priorities, we seek to engage constructively and effectively with our vendors and partners throughout our construction and property management supply chains to encourage ethical and sustainable business practices.

Vendor Requirements

Business Ethics

Vendors are required to comply with applicable laws including:

- Adherence to applicable "anti-corruption and anti-bribery" laws, directives and regulations that govern operations in the countries in which you operate
- Conducting your business activities in full compliance with applicable laws and regulations, including relevant antitrust and fair competition laws
- Conducting business with integrity and in a fair, equitable, and professional manner
- Maintaining confidentiality of data as per local laws and regulations
- Declaring any potential or actual conflicts of interest to EQT Exeter
- Being honest, direct, and truthful in discussions with regulatory agency and government officials

Human and Labor Rights

Vendors are required to take reasonable steps to ensure that:

- You comply with all local human rights, working hours, paid leave and minimum wage regulations
- You provide an inclusive workplace free of discrimination, harassment, bullying and other unlawful behaviour
- You prohibit child, forced or involuntary labour, and physical punishment to discipline employees
- You source products and services from sources free of forced labor and modern slavery
- Your supply chain complies with local laws governing import of products / materials from regions at risk of forced labor (including the US Uyghur Forced Labor Prevention Act for US-based vendors)
- Your supply chain a) does not include any entity on the US DHS prohibited list ([UFLPA Entity List](#)), b) you provide evidence on our reasonable request to our reasonable satisfaction that your supply chain does not source products from manufacturers at risk of exposure to forced labor
- All your employees or sub-contractors' employees (either direct, or through recruitment agencies), hold all legal work permits and visas
- You prohibit the use of recruitment fees, deposits, including by recruitment agencies, or other practices that may prevent employees from freely ending their employment
- You respect the rights of employees to associate freely, join or not join trade unions and/ or workers' councils, and engage in collective bargaining in accordance with national laws and international conventions
- You have or establish fair disciplinary, grievance and termination procedures for employees
- Your employment terms are clearly understood by workers and are explained verbally or provided in a written contract in a language they understand, as per local regulations and aligned to the provisions of this Code as a minimum
- Your collection and further processing of employees' personal data are done in compliance with the applicable data privacy legislation and best practices

Health and Wellbeing

Vendors are encouraged to:

- Provide a safe, secure and healthy working environment for all of their workforce
- Develop and implement effective health and safety management systems
- Ensure that safety management systems support identifying and controlling risks, measuring and monitoring performance, and driving continual improvements to mitigate or minimize health and safety risks emanating from your operations
- Ensure protection of your workforce by providing basic personal protective equipment appropriate to the nature of work and relevant training on health and safety systems
- Comply with all health and safety regulations, professional procedures, and/or codes of practice
- Comply with EQT Exeter health and safety requirements while on our premises or work sites
- Report any accidents, incidents, dangerous occurrences and faults or defects in plant or machinery to EQT Exeter
- Empower workers to report unsafe practices without fear of reprisal
- Commit to proactively undertake safety initiatives to protect people and assets from harm and damage

Community Value

Vendors are encouraged to:

- Where appropriate, take reasonable measures to assist site-based EQT Exeter initiatives related to employee diversity & inclusion, local community investment, and the measurement of social benefits of new developments
- Where possible, preference local suppliers and locally-based staff in order to support the local community

Environmental Priorities

Vendors are encouraged to:

- Comply with all applicable environmental regulations regarding air emissions and wastewater discharges and the transportation, storage and disposal of hazardous materials and waste
 - Seek to use natural resources, energy, water and raw materials efficiently, and minimize pollution (including greenhouse gas emissions) and waste
 - Co-operate with EQT Exeter to measure the sustainability performance of construction materials as required
 - Comply in full with EQT Exeter sustainability requirements for a construction site as directed including those related to the sustainable building certification scheme
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Code of Conduct Scope and Governance

EQT Exeter strives to achieve continual improvement. It is committed to advancing its policies, guidelines, and systems across the company to ensure it addresses and monitors performance in all aspects of sustainability that are relevant to the business.

EQT Exeter understands that Vendors are independent entities; however, the business practices and actions of a Vendor may significantly impact and reflect upon EQT Exeter, its reputation and its brand, which is one of the company's most important assets.

We therefore encourage our Vendors to develop and implement relevant management systems, appropriate for a company of their size and industry to ensure compliance with applicable laws and regulations and the requirements of the Code. The underlying objective of this Code is to establish a basis for positive development of responsible procurement practices through regular dialogues and ongoing working relationships. However, in the incident of severe violations of the Code, we reserve the right to take actions including and up to termination of contracts.

All Vendors should educate their representatives to ensure they understand and can comply with the Code, in so far as it applies to the product or service that they are supplying.

The Code will be communicated to Vendors at the pre-qualification stage and with every new contract or contract renewal.

We may assess our Vendors' compliance with the Code through a combination of audits, self-assessments and documentation reviews. We reserve the right to request reasonable evidence of your compliance with the Code.

This Code will be reviewed and updated as necessary on an annual basis and any amendment will be communicated to you in writing.

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