



Policy Statement on Respect for Human Rights

for the Branicks Group and its employees¹

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Scope of validity	Branicks Group

Version management

Version	Date	Revision	Source	Approved by
1.0	15/12/2021	-	DIC	Management Board
2.0	16/02/2022	Substantive addition	DIC	Management Board
3.0	01/12/2023	Substantive addition	Branicks	Management Board

¹ The term “employee” is defined as: any person employed by Branicks Group AG and its member companies, including executives (while not including members of corporate bodies of Branicks Group AG), temporary employees, part-time employees, temporary student workers, short-term workers, apprentices, trainees and interns. To ensure a pleasant reading experience, it was decided to use male terms only for any gendered job titles and nouns that refer to persons generically, where applicable. The generic use of male terms is principally gender-inclusive in the sense of gender equality. The short generic form was chosen for editorial reasons alone, so as to improve the text’s readability, and implies no judgement of any kind.



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1. Unconditional Commitment to Human Rights Standards

The Branicks Group is a company with an integrated business model that is based on two complementary segments, one representing its proprietary portfolio (Commercial Portfolio), the other being its third-party business (Institutional Business). Within this framework, we are engaging the most diverse stakeholder expectations around the world, including those of shareholders, tenants and institutional clients.

It goes without saying that we comply with all locally applicable legal provisions as an integral component of our corporate governance. In fact, it represents the basic requirement for fair and sustainable coexistence, not just in business but also as a society in general.

This Policy Statement explains our commitment to respect human rights in our business and at every stage of our value chain. Ensuring strict respect for human rights constitutes our common task.

For the purpose of implementing this pledge, we align our corporate action specifically with the following conventions:

- the United Nations Universal Declaration of Human Rights
- the United Nations Guiding Principles on Business and Human Rights
- the Eight Core Labour Standards of the International Labour Organisation (ILO)
- the Ten Principles of the UN Global Compact

We consider the values and standards contained therein to be the main foundation of our corporate culture. This also includes even and especially the principles of freedom of assembly, freedom of association and the right to collective bargaining enshrined in the fundamental rights.



2. Observing Our Duty of Care Regarding Human Rights

2.1. Good and Safe Working Conditions, Protection against Discrimination

The knowledge, skills and commitment of our employees constitute the bedrock of our company's success. We can successfully sustain our business activities only if we have qualified and motivated employees who represent our company to the outside world in a responsible and enthusiastic manner. A positive corporate culture and a safe work environment are indispensable for achieving this.

Our Compliance Policy obligates all employees of the Branicks Group to uphold the principles of ethical conduct and integrity within the group. In particular, this includes compliance with the applicable legal provisions, the internal company guidelines, and the adopted values. The Compliance Policy defines comprehensive safeguards against discrimination, particularly in regard to ethnic identity, gender, religion or belief, disability, age and sexual identity. It is our stated objective to actively counter discrimination, unfairness and undesirable behaviour, and to show zero tolerance for these. We prohibit all forms of forced labor, child labor and human trafficking.

We see diversity as a strength that we encourage in a dedicated effort. Our company benefits from exposure to different but mutually complementary professional profiles, and a wide variety of working and living experiences.

Other important building blocks of our company policy include the promotion of employee development and advancement, not least through continuing education and market-consistent pay as well as by honouring their right to leisure and recreation. The latter aspect includes rules that govern flexible working hours and family leave.

2.2. Compliance with Ethical Standards along the Supply Chain

Our pledge to respect human rights also covers every interaction with our business partners: We presume their compliance with the same ethical standards



so as to make it the condition for a sustainable and prospering business relationship. In addition, we demand that our business partners also integrate and implement these standards in their business relationships.

Our principles of adherence to ethical standards along our supply chain are detailed in our Business Partner Code of Conduct. The code serves as foundation for any business relationship between the Branicks Group and third parties. It mandates, inter alia, compliance with occupational safety and health regulations as well as the strict prohibition of forced labour, child labour and human trafficking in any form and of discrimination. The Branicks Group tolerates no violations of its Business Partner Code of Conduct, and will penalise such violations all the way to the termination of the business relationship.

2.3. Local Communities

Handling historically evolved neighbourhoods respectfully through sensitive property and urban development as well as charitable and social commitment with a focus on promoting local communities are important to us. As an owner and manager of real estate assets, we are therefore committed to consult with local communities, such as residents, that may be impacted by our business activities or real estate projects.

2.4. Privacy and Data Protection

We respect and protect the privacy of all our stakeholders, including our employees and our investors, and safeguard confidential information pursuant to applicable data protection laws and in accordance with the European Data Protection Regulation (GDPR).

3. Compliance with the Policy Statement

This Policy Statement is part of our operational processes, and embedded in every level of our business activities. Each and every member of the Branicks Group must integrate the principles of the Policy Statement in their work sphere and



strictly adhere to them. More than others, the Management Board and the company's executives are responsible for creating the organisational framework toward this end, and to ensure compliance.

4. Continuous Reviews and Updates

Just like any other of our policies, this Policy Statement is subject to regular reviews and upgrades by the Management Board to ensure it always reflects the current circumstances and risks.

5. Indications of Misconduct and Breaches

If you wish to report indications of misconduct and breaches, or if you have any concerns or questions, feel free to get in touch with the contact persons and to use the contact options identified in Sections 10 and 12 of the Compliance Policy.