



**NEPI
ROCKCASTLE**

**Go Green
Keep Clean**

**SUSTAINABILITY
COMMITMENT**

Sustainability Commitment



At NEPI Rockcastle Group (“NRP” Group), we are committed to leading the change to a better future by continuously increasing the sustainability of our value chain, joining efforts with Business Partners who share similar ambitions around innovation, positive environmental impact, circularity, dialogue, fairness, and equality. Working together is how we will influence the industry, create a deeper, more effective relationship, serve customers with ever- better value and meet their ever-increasing expectations.

The Sustainability Commitment indicates our priorities and expectations from our Business Partners — both in their own business and in their supply chains (including the business operations and supply chains of any other legal entity controlled by or under common control), at least with respect to the assets operated by NRP Group. As we believe in reciprocity and collaboration, we ensure our Business Partners that we have committed to the same priorities that we are expecting them to commit to. We encourage our Business Partners to comply with the requirements outlined in this Sustainability Commitment, and to implement them in their operations as well as in their supply chains.

We also aim to collaborate with Business Partners that are open to be evaluated (suppliers mainly) based on our sustainability performance standards as described herein as well as described in Nepi’s policies.

This commitment is here to Nepi and its business partners remain responsive to emerging challenges facing our world due to climate change. We will update the document on current basis and encourage our Business partners to adhere to these updates and inform us of any impediments in doing so. We value the Business Partners who share our ambition for ever-evolving standards and work actively to meet them.

Honesty is always the best policy

The best way to implement this Sustainability Commitment is through an open and collaborative dialogue. If there are any questions or requirements about this document, please contact. We are keeping up with our Commitment or applicable laws and engaging in adequate remediation are key in our partnership.

Everyone at your organisation is welcome to raise concerns in connection with this Sustainability Commitment, anonymously if preferred, at <https://nepirockcastle.com/group/corporate-governance/whistleblowing-policy/>.

Full transparency around sustainability data

Sharing of sustainability performance data helps us all make sure we are making the right impact and therefore we would welcome you sharing the relevant data. Any data collected, processed, stored, or shared in connection to monitoring our Business Partner’s performance will be treated respectfully, lawfully, fairly, and transparently, and limited to a specific and documented purpose. NRP Group, and all third-party organisations appointed by us are committed to protecting the personal data of every stakeholder, including suppliers, customers, and workers by ensuring adequate safeguards for the accuracy and integrity of personal data.

EMS / monitoring system for Supply Chain Due Diligence

Business Partners are expected to have effective data collection systems in place to integrate the requirements of this Sustainability Commitment and related applicable laws or international standards into regular operational practices. The system should be adequate to the size, complexity and risk environment of each business and include a sufficient level of human rights and environmental due diligence processes, to identify, prevent and mitigate actual and potential adverse impacts on people and the environment in their operations, supply chains and business relationships. At a minimum, Business Partners shall also engage with their next tier suppliers to acknowledge and implement similar requirements as stated under this Commitment and shall establish practices for monitoring compliance. We expect our Business Partners to operate in line with all applicable laws and our Sustainability Commitment, while offering the greatest protection for employees and environment.

Impact on People

NRP Group wants to be part of a real estate industry that provides fair jobs and equal treatment for everyone. We respect human rights, promote inclusion, and champion diversity throughout our operations and the supply chain, therefore we encourage for our Business Partners to do the same. The Business Partner's cooperating with NRP Group are encouraged to apply equal treatment to all employees, including temporary, migrant, apprentices, students, self-employed, or any other type of worker under the influence of the Business Partner or its next tier suppliers. Efforts shall be made to identify specific vulnerabilities and instate measures for the protection and support of vulnerable individuals or groups.

What is not accepted in Nepi.

Written policies and routines shall be in place to prevent any form of forced, bonded, prison or illegal labour, with special consideration for the increased risk of vulnerable categories. Overtime must respect law obligations, with the exceptions defined by applicable legislation and collective bargaining agreements where the case, and there can be no threat of penalty against workers refusing overtime. The employer is responsible for payment of all employment eligibility fees and costs of all workers,

i, as provided by the applicable laws. No persons are recruited at an age younger than 18. If any child labour case is detected, the employer is expected to actively engage in remediation and to carry the cost for such intervention until the child has reached the legal age of working. All legal limitations and requirements regarding the employment of persons below the age of 18 must be followed. They shall be protected from any hazardous work, night shift, and any kind of work that might hamper their development or impose any physical harm.

Contractual basis of employment is recognised.

All work performed must be based on a legally established and recognised contractual relationship, the nature of which shall not deprive workers of the rights arising from labour or social security laws. All employees are entitled to a written contract, in a language they understand, that specifies the mutually agreed terms and conditions of employment and are applicable as per employment legislation depending on the country. These conditions cannot be changed unilaterally by the employer during the term of the contract. When workforce is secured via recruitment companies, the employer is responsible for ensuring that these companies meet the requirements and expectations of this Sustainability Commitment and applicable law/standards.

Fair wages and benefits.

Every employee has a right to compensation for a regular work week that is sufficient to meet basic needs and provide some discretionary income. Employers shall seek to take appropriate actions towards realising such a level. No withdrawals or deductions from wages, other than the ones legally mandated, shall be made without prior authorisation from the workers. All benefits mandated by law must be provided, including any type of paid leave and statutory severance. All contributions to any of the following social insurance or social security programmes are made in line with legal requirements: pension, medical, work-related injury, unemployment, maternity, other applicable by law.

Working hours.

Working hours and rest time shall comply with national law and shall be defined in contracts. A reliable system for registering working hours, including overtime, of all workers must be maintained.

Sustainability Commitment» continued



What is not tolerated at Nepi.

Every worker is treated with respect and dignity at all times and protected from any form of physical, sexual, psychological, or verbal harassment occurring during, linked with, or arising out of work. There is a grievance mechanism in place enabling workers to raise complaints without risk of retaliation. There are effective remediation processes in place to address cases of harassment and abuse. There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement on the grounds of gender or sexual orientation, race, colour, age, pregnancy, marital status, religion, political opinion, nationality, ethnic origin, caste, disease, or disability.

Nepi takes care of workplaces.

The health & safety of workers must be a priority at all times and a safe and hygienic working environment shall be provided, in full compliance with all applicable regulations and standards.

Respect.

Business Partners shall ensure compliance with all applicable privacy and information security laws when collecting, storing, processing, or sharing personal information of anyone Business Partners do business with, including suppliers, customers, consumers, and employees. Business Partners' processing of personal data follows the principles of respect for personal privacy and autonomy, fairness, and transparency. NRP Group recognizes the important role of human rights and environmental defenders to bring attention to issues across our value chain. We do not interfere with the activities of human rights or environmental defenders and for topics of shared concern, we may actively support their work. We expect our Business Partners to follow the policy of non-interference and to respect the lawful activities of human rights and environmental defenders, and the right to freedom of expression, freedom of association, and peaceful assembly.

Impact on the Planet and Environment

We expect Business Partners to have a strong commitment to reducing their environmental footprint. We take our responsibility to stay within the planetary boundaries very seriously. We acknowledge climate change and resource depletion as two of the greatest challenges facing our planet today. Both contribute to losses in natural world and worsen existing human rights problems. Their consequences affect the health of our entire planet and everyone living on it – making them key challenges to all industries, including ours. To address them, it is crucial to remove silo thinking and move to a circular model where we maximise the value of products and resources by reusing and repairing them as much as possible, before finally recycling them.

Below requirements are applicable to the Business Partner's with whom our Group is engaging.

Energy use and impact on climate and air quality are minimised.

Business Partners shall actively mitigate their impacts on climate change and air quality by ensuring that:

- Air emissions are routinely monitored, controlled, and treated prior to discharge as required by law.
- Ozone-depleting substances, such as certain refrigerants used in HVAC systems, are being effectively phased out in accordance with the Montreal Protocol and applicable regulations.
- Continuous improvement in energy management and efficiency is actively pursued.
- It is recommended that Greenhouse Gases (GHG) emissions are calculated and reported according to the **GHG Protocol** and reduction targets are set that are aligned with the **Science Based Targets Initiative** (SBTi). (where possible or applicable)
- Energy sources are responsibly selected and there is an action plan for progressive adoption of renewable or less carbon-intensive energy sources.

Sustainability Commitment» continued



Water resources are safeguarded.

To reduce their impact on water resources and the access to water of surrounding communities, Business Partners shall ensure that:

- Water consumption is metered
- Records of treatment services for wastewater discharge (if applicable and relevant within their line of business) are kept.
- Continuous improvement in water management and efficiency is actively pursued.

Chemical use is properly managed.

All materials used in providing the contracted services to the NRP Group, including chemical products used for cleaning, sanitizing and pest-control. All storage, handling, use and disposal of chemicals observes the Safety Data Sheet (SDS) of each chemical product.

Waste is minimised and responsibly handled. Circularity is promoted.

To enable the transition to a circular economy, Business Partners shall ensure that:

- Proactive efforts are made to maximise the reuse and recycling of interior and construction material during redevelopment, refurbishment and reinstatement works, if applicable in their line of business.
- Waste generation is actively prevented, waste streams are being tracked and targets with action plans are set for increasing re-use and recycling and for eliminating waste going to landfill, if applicable in their line of business.
- All hazardous waste is handled by an authorised company or licensed receiver, if applicable in their line of business.
- Reasonable efforts shall be made to provide data on quantity per waste stream and ways of treatment for waste generated in the facilities. Whenever this is not possible, a report on the method of waste treatment shall at least be provided.
- Continuous improvement in optimisation of material usage is achieved, increasing recycling and re-use of materials, if applicable in their line of business.
- Solutions in-line with circular economy innovation shall be actively identified and implemented, if applicable in their line of business.

