

International Labor Organization (ILO) aligned Policy



February 2025



Contents

Preamble	3
Human Rights Impact Assessment (HRIA)	3
ILO Policy Commitments	3
Elimination of Forced Labour or Compulsory Labour	3
Forced Overtime	4
Data Privacy	4
Elimination of Child Labour and the Protection of Children and Young Persons	4
Elimination of Discrimination in respect of Employment and Occupation	4
Equality of Opportunity and Treatment	4
Social Security and Parental Leave	5
Freedom of Association, Collective Bargaining, and Industrial Relations	5
Safe and Healthy Working Environment	5
Connections with internal regulatory framework	6
Policy Implementation	6

International Labor Organization (ILO) aligned Policy

Preamble

NEPI Rockcastle Group, (the “Group”) is committed to upholding human rights and promoting their realization in all our operations and business relations. This policy is anchored in the principles and rights at work as outlined by the International Labour Organization (ILO). It articulates further the global principles outlined in the Code of Ethics and other internal policies.

This policy is in effect at all NEPI locations and applies to all NEPI employees. Our Board, all managers and employees bear a responsibility to act in a way that respects social and labour standards as outlined in this policy. In line with the Group’s Corporate Governance, directors in all the SPVs are responsible for ensuring that this policy is adhered to in the frame of local law and practice.

Human Rights Impact Assessment (HRIA)

This chapter describes our process to identify, understand, assess, and address the risks posed by our operations and services to the human rights of various stakeholders, including employees and communities.

After evaluating our core operations’ activities, we have identified relevant human rights-related risks that are specific to the real estate sector and our Group’s business model. Relevant human rights-related risks refer to supply chain challenges such as forced labour or child labour, inclusion and elimination of discrimination, and a safe and healthy working environment. These risks underscore the importance of addressing and mitigating potential negative impacts on human rights within this sector. The identified risks involve various dimensions and are covered in HRIA (Human rights impact assessment) in functional areas such as **Human Resources** and **Health and Safety**.

In our supply chain, NEPI Rockcastle faces human rights risks as business partners of other companies/sub-contractors which may be associated with poor practices or controversy. To effectively identify and prioritize human rights risks, we actively engage in a transparent and collaborative communication process with our tenants and suppliers through and based on our contracts.

NEPI Rockcastle is committed to observe the risks in the supply chain and ensure collaboration solely with legal and legitimate entities. This process involves rigorous identity assessment and evaluation of potential involvement in illegal activities, based on the Know your Partner process. Standardized risk assessment, based on defined eligibility criteria and a structured risk matrix, follows a risk-based approach with low tolerance for deviations from established targets. Rare exceptions undergo a thoroughly documented process, facilitating continuous risk monitoring and effective management.

ILO Policy Commitments

Elimination of Forced Labour or Compulsory Labour

NEPI diligently adheres to national laws and regulations, with a specific focus on prohibiting forced labour and human trafficking across our entire value chain. We expect our partners to have robust and effective data collection systems in place to integrate the requirements of our [Sustainability Commitment](#) and related applicable laws or international standards into regular operational practices.

All work relationships are established upon the mutual consent of the contracting parties. Both parties retain the right to terminate the work relationship, subject to adherence to legally stipulated terms and conditions. Termination should be accompanied by reasonable notice, respecting mutually agreed-upon terms and conditions specified in labour contracts and NEPI’s internal policies. To ensure transparency, we actively inform workers about their rights, providing written employment contracts in a language understood by the employee¹. We avoid practices that hinder freedom in employment according to labour contract such as deposit requirements or recruitment fees.

We prevent the use of forced labour among vulnerable groups by implementing a dedicated policy that addresses discrimination, harassment, or victimization. Our policy aims to foster a work environment where people feel included and free to be themselves at work, ensuring fair and equitable treatment for all individuals, regardless of gender, while actively combating the risk of forced labour within our operations².

¹. Sustainability commitment + Labour contract. ². Diversity and Inclusion Policy p. 6.

International Labor Organization (ILO) aligned Policy

Forced Overtime

Overtime work can only be done upon the Employer's request, with the Employee's consent, except for Force Majeure situations and in case of urgent works meant to prevent accidents or to remove the consequences of an accident already occurred, when the Employee's consent is not necessary. 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 overtime³.

Data Privacy

The Group has set up a structure and implements strict Data Privacy policies and procedures regarding data privacy. These measures specifically address instances of regulatory non-compliance that could adversely impact the rights of data subjects, as well as any unlawful data processing. Additionally, the framework extends to cover cases of personnel misconduct that may lead to substantial reputational or financial consequences for the Group.

Elimination of Child Labour and the Protection of Children and Young Persons

NEPI is steadfast in its commitment to eradicating child labour⁴, adhering to international standards irrespective of the location where child labour occurs. Strict adherence to legal limitations and requirements for the employment of individuals under 18 is mandatory, ensuring protection from hazardous work, night shifts, and any tasks detrimental to their well-being or development⁵.

Our commitment goes beyond mere compliance; it underscores our proactive approach to identifying, assessing, and addressing child labour within our operations. To ensure the effective enforcement of our commitment to preventing child labour, we prioritize awareness and understanding at all levels of our organization. This includes relevant managers, employees, and suppliers who must be fully aware of the commitment and its implications. In the event of identifying child labour, the employer is expected to actively participate in remediation, covering the associated costs until the child reaches the legal working age⁶.

Elimination of Discrimination in respect of Employment and Occupation

NEPI is dedicated to fostering a diverse and inclusive workplace that values qualifications, skills, and experience as the primary criteria for recruitment and selection procedures, placement, training, and career development across all organizational levels. We assign high-level responsibility for equal employment issues and implement diversity and inclusion policies that guide equal employment practices, linking advancement to performance in this crucial area⁷.

To further promote inclusivity, we provide relevant worker categories with comprehensive staff training⁸ on non-discrimination policies and practices, including disability awareness. Our commitment extends to reasonably adjusting the environment by enhancing accessibility, ensuring the health and safety of employees, customers, and visitors with disabilities.

In our pursuit of equality, we evaluate distinctions on a case-by-case basis, ensuring they are inherent requirements of a job to prevent exclusion based on unrelated factors⁹. Transparent record-keeping on recruitment, remuneration, training, and promotion offers a clear view of opportunities and employee progression within the organization.

Our commitment to diversity extends to the development of programs promoting access to skills development training and specific occupations, reinforcing our dedication to creating a workplace that is not only diverse but also inclusive and supportive of all employees.

Equality of Opportunity and Treatment

Our remuneration policy ensures that all employees receive fair and equitable wages that meet or exceed local minimum wage standards, supporting an adequate standard of living for our employees¹⁰. We therefore commit to the principles of performance driven pay, competitive pay, total annual package, variable pay, fair pay and annual pay review¹¹. Additionally, NEPI extends the commitment to equality to encompass benefits, both salary and non-salary, public and private social security schemes, employer organizations, trade unions, professional bodies, and social benefits and services provided in accordance with applicable legislation. This comprehensive approach underscores our dedication to fostering a workplace environment that is inclusive, diverse, and committed to the principles of equal treatment for all¹².

International Labor Organization (ILO) aligned Policy

Social Security and Parental Leave

Our commitment to social security ensures comprehensive benefits for our workforce. We support and contribute to social security systems, providing protection for employees in cases of unemployment, illness, disability, and old age. Our policies ensure that employees have access to adequate social security benefits in line with local regulations and standards.

At NEPI, we implement policies that support a balance between work and personal life, promoting the social welfare of our employees regardless of race, gender, religion, cultural background, ethnicity, sexual orientation, disability, political opinion, family responsibility, age, social origin, or any other status. Measures include flexible working arrangements and hybrid work, support for families, and initiatives that enhance the quality of life of our workforce¹³.

We provide comprehensive maternity protection, including adequate paid leave and job security for pregnant employees and new mothers. The organization ensures that no employee faces discrimination due to pregnancy or maternity leave. Employees are entitled to return to their same or an equivalent position post-leave, without any negative repercussions.

We adhere to local laws and standards regarding working hours, ensuring that regular working hours do not exceed legal limits. Employees are entitled to paid leave, including annual leave, sick leave, and parental leave, supporting their well-being and family life.

Freedom of Association, Collective Bargaining, and Industrial Relations

NEPI Rockcastle upholds the fundamental right of workers to freely form and join trade unions, aligning with national law. We foster a workplace that values diversity and inclusivity, hence recognizing the essential role of trade unions in representing employee interests.

Respecting the right to establish and join organizations of their own choice, we promote positive relations, encouraging open communication and collaboration freely and voluntarily. Our commitment aligns with the ILO's principles, emphasizing the democratic rights of workers to choose union participation without fear of reprisal.

To ensure non-discrimination, our policies cover trade union organization, membership, and activities across various employment facets. In accordance with legal requirements and internal policies, we can facilitate the necessary conditions, whereby worker representatives can develop effective collective agreements. We strictly refrain from any interference in their activities.

Safe and Healthy Working Environment

We uphold the rights of our workers in fostering a safe and healthy workplace. Workers are entitled to receive comprehensive information¹⁴ and training in Occupational Safety and Health (OSH) to empower them in their roles. Furthermore, our commitment includes active engagement, allowing workers to inquire into and be consulted on all aspects of OSH associated with their work¹⁵.

Our priority is a safe working environment for our employees. Through training, we equip workers and supervisors with the knowledge on how to perform their duties safely. We ensure workplaces, equipment, and processes are safe, taking measures to mitigate risks¹⁶. We provide protective clothing and equipment at no cost if required by the nature of the work performed, and we have emergency response measures in place. We actively consult, inform, and train workers and their representatives on OSH matters. This comprehensive approach reflects our dedication to a safe working environment.

Comprehensively mapping our supply chain is foundational to our commitment to prioritize workers' safety at work. We acknowledge the complexity of supply chains and actively work towards achieving visibility and addressing risks across diverse production points. As such, our procurement practices include an assessment of suppliers' compliance with safety and health standards, ensuring a holistic approach to worker safety.

¹³. Internal Regulation, p. 16-20; ¹⁴. Labour contract; ¹⁵. Internal Regulation, p.37; ¹⁶. Internal Regulation, p.37.

International Labor Organization (ILO) aligned Policy

Connections with internal regulatory framework

- Code of Ethics
- Risk Appetite Statement
- Diversity and Inclusion Policy
- Remuneration Regulation (Poland)
- Whistleblowing Policy
- Group Sustainability Commitment

Policy Implementation

Employees are encouraged to communicate openly and report any concerns or potential violations of this policy without fear of retaliation. All reported concerns are investigated promptly and thoroughly, with appropriate corrective actions taken to address any violations.



NR