



HUMAN RIGHTS POLICY



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I. INTRODUCTION

Cofinimmo's commitment to environmental, social and governance standards is set out in its ESG Policy, to which reference is made in full.

The purpose of this policy is to present Cofinimmo's minimum commitments in terms of human rights and labour. As a major player in the real estate sector, Cofinimmo devotes attention to respect for the fundamental rights of each individual in the context of its activities

and more specifically (i) its employees¹ and (ii) workers present on its sites.

It is fundamental for Cofinimmo to carry out its business activities by applying the highest ethical and moral standards. This focus is also reflected in its values: "we care, we connect, we commit".

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II. SCOPE

This Policy applies to the group, its executives (i.e. members of the board of directors, members of the committee and managers), and its employees. They are required to confirm that they have read and understood this policy and comply with it.

Where applicable, the provisions of this policy are included in the Code of Conduct, applicable to the group's managers, as well as to employees.

Cofinimmo also expects the same degree of commitment from its suppliers in terms of human rights. To this end, Cofinimmo has drawn up a Supplier Code of Conduct.

III. COMPLIANCE WITH APPLICABLE REGULATIONS

In terms of human rights, Cofinimmo adheres at all times and with strict compliance to the laws and regulations in force, both internationally (i.e. the standards established by the United Nations and its various bodies, and more specifically those of the Universal

Declaration of Human Rights) and nationally, regardless of the country in which Cofinimmo operates.

In the event of a conflict between the legal standards and this policy, the most stringent standards shall apply.

¹ The term "employee" includes Cofinimmo employees, its managers and, more generally, persons who have delegated powers to represent the company.



IV. RESPECT FOR THE HUMAN RIGHTS OF ITS EMPLOYEES

The success of any organisation depends not only on a vision capable of inspiring people, but also on the people of which it is comprised. They must have the opportunity to make the best use of their talents to turn this vision into reality. This approach is fully supported by Cofinimmo's Human Capital Strategy.

Cofinimmo invests in its employees to develop its business. It helps them maximise their potential by investing in their development, whether through personal development or coaching initiatives. The safety, well-being and resilience of its employees are also essential, and Cofinimmo actively invests in them through various initiatives.

a. Non-discrimination, diversity and inclusion

Cofinimmo refrains from any form of discrimination, both direct and indirect. Cofinimmo undertakes not to distinguish between people based on their age, gender, religious belief, political opinions, sexual orientation, social or ethnic origin, disability, family situation, nationality, surname or physical appearance.

Cofinimmo is convinced that the power of diversity (cultural, generational, linguistic, gender, etc.) is a strength, and promotes equal opportunities, which is a fundamental value of democracy.

Cofinimmo undertakes to make all reasonable arrangements for access to its premises and workstation 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. Cofinimmo shall refrain from using any form of intimidation to force anyone to enter into any relationship, of any kind, with Cofinimmo. In this context, employees are free to terminate their employment contract subject to reasonable notice.

c. Prohibition of child labour

Cofinimmo undertakes to respect the minimum legal age for admission to employment, regardless of the country in which Cofinimmo operates.

d. Freedom of association and collective bargaining

Cofinimmo undertakes to respect its employees' right to free association. Cofinimmo supports employees who wish to stand in social elections and refrains from exercising any discrimination, pressure, threat or abuse members of workers' organisations or trade unions.

e. Safety and well-being

Cofinimmo complies with the laws, regulations and standards applicable in the field of social security, health and safety, regardless of the country in which Cofinimmo operates. Compliance with applicable hygiene requirements is of the utmost importance, including sanitary facilities, living areas and working areas.

Cofinimmo has always attached the utmost importance to the well-being of its employees. To this end, Cofinimmo takes a series of measures to promote their well-being by encouraging them to carry out their duties in the best possible conditions (compliance with hygiene requirements, layout of work areas, implementation of measures to facilitate teleworking, possibility of undergoing regular preventive medical examinations, initiative to promote physical activity and a healthy diet, etc.).

Cofinimmo pays close attention to mental well-being and to the phenomenon of stress at work. To this end, Cofinimmo has implemented measures to prevent psychosocial risks at work.

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f. Working conditions

Cofinimmo complies with the applicable regulations relating to remuneration, salary protection, social benefits and working hours.

Since a good work-life balance is essential for the professional well-being of employees, Cofinimmo endeavours to put the necessary resources in place to implement various working methods (IT and teleworking policy, provision of the infrastructure and resources necessary for this purpose, possibility of benefiting from part-time work or flexible hours in order to cope with any constraints or obligations, etc.).

Cofinimmo offers all its employees, without any discrimination whatsoever, numerous opportunities to train and develop.

The salary package Cofinimmo offers its employees is based on identical criteria for every employee and takes into account an objective classification of functions. This is in addition to other non-statutory benefits available to employees. The salary conditions guarantee a fair, appropriate and comfortable standard of liv-

ing and the salary evolutions protect against increases in the cost of living.

g. Prohibition of any form of harassment, threats and abuse

Cofinimmo strongly condemns all forms of harassment and violence at work. Discriminatory practices, homophobic, xenophobic or racist comments, mental or physical cruelty, bullying or sexual harassment, gestures and/or conduct of a sexual, coercive, threatening or abusive nature, and generally any event in which a worker or another person is persecuted, threatened, abused or physically or psychologically assaulted, whether internally or vis-à-vis external contacts at Cofinimmo, are prohibited and will be subject to sanctions. The same applies to the connection to xenophobic or racist websites at work, or to the use of discriminatory or vexatious language in emails.

h. Whistleblowing and data protection

Cofinimmo has a Whistleblowing Policy and a Data Protection Statement for employees.

V. RESPECT FOR HUMAN RIGHTS BY ITS PARTNERS AND ON ITS SITES

Cofinimmo makes it a point of honour to respect human rights, in the broadest sense. As its activity is closely linked to that of its partners (whether suppliers, service providers, buyers, operators, etc.), Cofinimmo expects them to apply the same high standards in terms of human rights. Cofinimmo attaches particular importance

to the health and safety of its staff on construction sites, with the outsourcing of construction and maintenance activities going hand in hand with strict monitoring of these sub-contractors and the occupants of its buildings.



VI. MISCELLANEOUS

a. Notification and contact

The Human Rights Policy is part of and relates to ESG Policy. Any question, violation or concern related to the Human Rights Policy 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 Human Rights Policy is monitored by the Audit Committee, to which the compliance officer reports on a regular basis.