

## Occupational Health and Safety (OH&S) Policy

### 1. Introduction

As one of Europe's leading real estate companies, we at Aroundtown SA are committed to prioritizing health, safety and environmental protection as integral parts of our corporate values (integrity, sustainability, accountability, respect and performance).

We continuously improve existing occupational health and safety concepts and ensure that these topics are considered in all aspects of our business.

We strive to minimize exposure and risks to our employees and business partners by creating and maintaining a safe working environment that promotes health and productivity.<sup>1</sup>

We believe that motivated employees create a positive working environment and that Aroundtown SA is perceived as an attractive employer. The following principles serve as common standards for our commitment.

- Promotion and recognition of a safe and healthy work environment.
- Expansion of health promotion.
- Creation of a work environment that provides opportunities for personal and professional growth.

### 2. Scope

This Occupational Health and Safety Policy (“**Policy**”) applies globally to Aroundtown SA, its subsidiaries and affiliated companies (as defined in Section 15 of the German Stock Corporation Act) (“**Aroundtown Group**”), as well as to all companies in which the Aroundtown Group holds an interest, to the extent that such companies adopt this Policy as binding (hereinafter, all companies covered by the scope are referred to as “**Aroundtown**”). This Policy applies to all personnel, including officers, directors and apprentices.

### 3. Objective

This Policy defines the responsibilities of Aroundtown and emphasizes this commitment, which guides us on a daily basis.

A successful and sustainable concept of occupational health and safety requires the ongoing improvement of existing processes and the consistent implementation and further development of preventive measures, as well as compliance with applicable guidelines and laws.

Additional requirements, such as local legal requirements or applicable standards for occupational health and safety, must be implemented by the relevant responsible persons on site.

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<sup>1</sup> If the masculine form is used in this Policy, then it is only for ease of reading and simplification.

## **4. Responsibilities**

We believe that, in general, all occupational accidents and illnesses are preventable. Motivated employees and managers support us in our efforts to minimize work-related accidents and illnesses.

To meet this objective, each level of the organization is required to assume responsibility for compliance and implementation of the measures of their business units.

### **4.1. Management**

Senior management and the regional managers of the respective Group companies are responsible for the effective introduction, organization and implementation of health and safety measures in the workplace in accordance with this Policy and the relevant applicable laws and regulations. Management actively supports the measures and provides the necessary resources to achieve these goals. In particular, measures for the implementation of instruction and training (training measures), risk management and monitoring.

### **4.2. Employees**

Aroundtown Group employees are required to immediately notify their immediate supervisors and the Human Resources Department of any hazardous situations, injuries, accidents or illnesses related to their job duties.

### **4.3. Human Resources Department**

The Human Resources Department works closely with management to develop sustainable health programs. In countries where a Health and Safety Manager has not been locally appointed, the Human Resources Department is responsible for monitoring and documenting this Policy.

### **4.4. What we can do together**

It is our goal to preserve the physical and mental health of our employees and visitors. As part of our occupational health management, targeted offers and processes have been developed to preserve and promote the health, safety, well-being and performance of our employees.

In order to achieve this goal, we have developed comprehensive (preventative, detective and corrective) measures based on international standards and in compliance with legal requirements in the areas of occupational health and safety.

In addition to comprehensive and effective emergency care by trained first aid responders at our sites, we ensure that all necessary measures are taken, even beyond the legal framework. This includes:

- Preparation of risk assessment
- Procurement and use of safe operating materials and provision of required infrastructure
- Documentation of occupational accidents and occupational illnesses
- Training courses and instruction on occupational health and safety
- Reporting requirements in occupational health and safety
- Regular meetings of the Occupational Health and Safety Committee (ASA)
- Personal consultations to promote healthy and safe working and well-being
- Fresh fruit to promote a balanced diet

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- Fitness studio in the Berlin office and encouraging of active participation in sporting events
- Driving safety training
- Mental health support services
- Compliance with applicable health, safety and welfare legislation and obligations
- Support for reintegration after long periods of absence due to illness

The work equipment that is used, such as devices and tools, as well as the design of the workplaces, etc., are produced and procured in accordance with the legal requirements relating to occupational health and safety and occupational medicine and are checked regularly to ensure they are being used safely. Workplace must be operated and maintained safely in respect of their permitted use.

The condition of the workplace and the equipment used must be examined in the course of regular inspections by the responsible management and the occupational health and safety expert as well as by the officers designated by the company. The results of these inspections and any identified need for action/measures must be documented and their implementation arranged. Occupational health and safety inspections are to be conducted in accordance with the regulator and defined Group and company-specific requirements, and in any case at least once a year.

## **5. Suppliers**

We pursue development of future-looking concepts and processes and joint implementation of them with our contracting partners. This ambition extends beyond compliance with Aroundtown applicable health, safety, and environmental laws and standards.

Aroundtown takes into account the sustainable use of available resources in all decisions and actively avoids all materials that have potentially harmful effects on people and the environment. We aim to make an effective and tangible contribution to climate protection and the protection of human and labor rights.

We also expect our suppliers to recognize internationally acknowledged human rights as the basis of human coexistence and to comply with the corresponding standards. In addition, appropriate measures must be taken against risk of accidents. In particular, compliance with the statutory provisions on occupational health and safety, including the applicable Working Hours Act, is the basis for joint cooperation.

When supply agreements are drafted, occupational health and safety aspects must be taken into consideration and, if necessary, agreed with the occupational health and safety experts/designated officers.

## **6. Training and communication**

Through regular training and continued education of our employees, we promote skills and awareness of health-promoting behavior, safe working, and environmental protection in all areas of Aroundtown. This multifaceted training and development strategy is an important component of our support for employees' well-being. Aroundtown offers various measures to encourage employees to take an active role in maintaining their own health.

Different types of training enable our employees to identify risks and hazards. A training for fire and evacuation assistants as well as a first aid training is organized with external and internal instructors in addition to the required e-learning courses on health and safety for all.

Our employees are encouraged to work with each other and our business partners to develop solutions together. As such, we welcome and encourage our employees to actively apply the knowledge that they have learned in their training courses and in accordance with the latest state of technology in their daily work.

## 7. Risk identification and monitoring

Through an open dialogue and regular monitoring of this Policy, we ensure that the proper measures are implemented. We conduct regular audits by competent persons with regard to occupational health and safety.

It will be ensured that each Group company is audited every three to five years.

## 8. Reporting possibilities

It is the responsibility of each employee to take care of his or her own health and safety at work and for the safety of others who may be adversely affected by his or her acts or omissions. If there are any concerns or questions about working conditions or safety precautions, please contact the Human Resources Department or the appropriate supervisor.

If they choose to do so, employees and external parties can report any incidents or damage at any time via the Speak-Up whistleblowing system, including anonymously via the BKMS system, or directly via **Compliance@aroundtown.de**.

## 9. Validity and entry into force

This Policy was approved by the Board of Directors and will come into force on **01.01.2024**. It replaces all previous guidelines and/or policies issued in this regard.

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