

Human Rights Policy (Internal and External)

Scope of Policy

This Human Rights 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. If the masculine form is used in this Policy, then it is only for ease of reading and simplification.

Commitment

As a leading European real estate company with a steadily growing number of employees, we are aware of our responsibility to respect and uphold human rights, both within the Aroundtown Group and vis-à-vis external parties, in particular our business partners. This is always done without exception, and in every location in which Aroundtown operates. Aroundtown respects the right to equality, the right to a safe work environment, and the right to fair remuneration and working conditions for all employees.

This Policy is aligned with the following international frameworks and standards, including:

- UN Guiding Principles on Business and Human Rights,
- OECD Guidelines for Multinational Enterprises,
- International Labor Organization’s Conventions on Fundamental Principles and Rights at Work, and
- International Bill of Human Rights.

Aroundtown respects and promotes human rights standards throughout its organization with its policies and procedures as important tools to achieve this. Aroundtown conducts human rights due diligence on critical suppliers based on a preceding risk assessment. If Aroundtown were in future to operate in locations where there is a risk of human rights violations, it is committed to undertaking further in-depth human rights due diligence.

We consider every person as unique and recognize that individual differences including, but not limited to, ethnic or social origin, race, gender or sexual identity, religion or belief, physical and mental abilities, age, family status and sexual orientation enhance and benefit the diversity of Aroundtown and respect each individual’s personal dignity. We do not tolerate any form of discrimination or harassment of employees on the basis of any of the above. This is further set out in our Anti-Discrimination Policy.

We expect from each employee as well as from each of our business partners that they will also apply this standard.

Human Rights

The Aroundtown Group’s policies and procedures strive to demonstrate this respect for human rights within its operations as well as its supply chain, including a zero-tolerance approach to modern slavery, human trafficking and forced labour which are violations of fundamental rights. These policies are published on Aroundtown’s intranet and a selection are available on our website at <https://www.aroundtown.de/sustainability/sustainability-governance>

These rights include, among others:

✓ Right to equality	✓ Right to a safe work environment
✓ Respect for personal dignity, freedom from discrimination and harassment	✓ Right to political engagement
✓ Right to security of person and freedom from human trafficking	✓ Freedom of association
✓ Freedom of speech, thought and religion	✓ Right to education and development
✓ Right to social security	✓ Right to family life
✓ Right to fair remuneration (e.g., minimum wage) and working conditions	✓ Right to privacy, rest, and leisure

Prohibition of child and forced labor

The Aroundtown Group strictly prohibits all forms of human trafficking, as well as child and forced labor in its supply chain. Through our Code of Conduct for Business Partners, we strive to ensure that all business partners also abide by this and adhere to fair working conditions without the use of disciplinary measures in accordance with applicable national legislation.

Tenants

Aroundtown seeks to respect the human rights of our tenants in all countries and regions in which it operates. Our focus areas include respecting the privacy of tenants, e.g., via safe storage of any personal data, as described in the provided Privacy Notice; and endeavoring to ensure that no tenant is discriminated against. In addition, we strive to ensure that our tenant marketing does not communicate a specific ideal, but rather a range of lifestyles and backgrounds.

Our Workforce

Aroundtown's values are embedded in its guiding principles (integrity, respect, performance, accountability, sustainability). Respecting the human rights of our workforce, including labor rights freedom of political engagement and association and operating in an ethical manner are integral parts of our day-to-day business conduct. We are committed to providing a safe working environment, providing human rights training, and supporting training and development opportunities as set out in our Occupational Health and Safety Policy.

We at Aroundtown assume that all employees will always be guided by company values as well as the company's Employee Code of Conduct this Policy also provides additional guidance to support a corporate culture characterized by respect and recognition of human rights.

It is expected that, upon becoming employed by the company, each employee will confirm that they have read this Policy upon joining Aroundtown and that they shall comply with this Policy throughout the term of their employment. External persons, including Aroundtown's stakeholders, are informed about this Policy through the non-financial report as well as the Aroundtown website (www.aroundtown.de).

Expectation from Business Partners

We work with business partners that sign our Code of Conduct for Business Partners. It is expected from our business partners (which include commercial tenants, suppliers, and other contract partners) to comply with applicable laws and human rights standards. Our Green Procurement Policy demonstrates to business partners Aroundtown's commitment to sustainability and protection of human rights.

Reporting and Monitoring of Potential Violations

Aroundtown has a whistleblower system in place. Should an employee or an external party becomes aware of any violations of internationally applicable human rights standards, or have a reasonable suspicion of such, the individual is requested to report this immediately to their manager or via the whistleblowing system (for employees and externals). Reporting a reasonable suspicion or violation shall not lead to consequences for the reporting person. For further details, please refer to the Aroundtown Whistleblower Policy.

All reports are then forwarded to the compliance department. Reported violations are brought to the attention of management in regular meetings as part of the Aroundtown Group’s compliance assessment process. In order to conduct an assessment of human rights violation risks across its supply chain, Aroundtown reserves the right to request information from business partners by way of questionnaires or other requests for information in order to ensure adherence to the above-mentioned human rights frameworks. Applicable laws and data protection principles are adhered to in this context.

Aroundtown shall act without hesitation should any business partner be found not to be in compliance with standards and principles detailed in this Policy. After clarification of the relevant set of circumstances that represent a potential violation of the standards and principles named in this Policy, it shall be demanded from the relevant business partner to initiate corrective measures within a reasonable period of time. Should the business partner be unable or unwilling to provide evidence of any such corrective measures, or should a violation be so serious that a continuation of the business relationship cannot reasonably be expected, Aroundtown reserves the right to terminate any existing contractual relationship if corrective measures have not been implemented within a reasonable timeframe.

Aroundtown expects from its business partners that they shall regularly inform their employees and any staff deployed in the context of a business relationship with Aroundtown on human rights topics and to implement appropriate structures and processes in order to ensure adherence to human rights principles. Aroundtown is committed to reporting on human rights violations as part of the non-financial reporting on an annual basis. [If a violation of human rights is confirmed within Aroundtown’s supply chain, it is committed to finding possible resolutions to rectify any negative impacts.

Approval of Policies

This Policy has been reviewed and approved by Aroundtown’s CEO as well as the Board of Directors before coming into force and will be reviewed regularly.

This Policy is considered as final and replaces all previous guidelines and/or policies issued in this regard.

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