

BUSINESS PARTNER CODE OF CONDUCT

1. Definitions:

- a. **Company** - ROBYG S.A. with the registered seat in Warsaw (Al. Rzeczypospolitej 1, 02-972 Warsaw), entered into the register of entrepreneurs maintained by the District Court for the Capital City of Warsaw in Warsaw, 13th Trade Division of the National Court Register under number KRS 0000280398, tax identification number NIP 525-23-92-367, statistical number REGON 140900353, initial capital: PLN 28,940,119.90 (contributed in full),
- b. **Group Company** - company affiliated with ROBYG S.A. in terms of capital,
- c. **ROBYG Capital Group** - the Company and Group Companies,
- d. **Employee** - an individual employed at ROBYG Capital Group pursuant to an employment contract,
- e. **Regular Collaborator** - an individual providing services to ROBYG Capital Group on the basis of a civil law contract, including under a sole proprietorship carried out on a permanent basis,
- f. **Contractor** - a natural person, legal person or an organizational unit without legal personality that has entered into a contract with a company of ROBYG Capital Group, that has submitted a quotation to a ROBYG Capital Group company or has received a request for proposal from a ROBYG Capital Group company, or that is negotiating with a ROBYG Capital Group company with a view to conclude a contract or is seeking to enter into a business relationship with a ROBYG Capital Group company.

2. Introduction:

We are a developer that has been changing Polish architecture for years, setting trends in the housing industry. The many years of experience in selling flats and creating living space allow us to optimally adapt the estates we build to the needs of the modern consumer.

We wish to be the natural choice for anyone looking for housing of a good standard and location at a satisfactory price. We want to create friendly and safe places to live. That is why we design them in line with the idea of sustainable development, with the environment and the needs of both individuals and entire communities in mind.

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The pillars of our conduct are as follows:

- care,
- support,
- responsibility.

Care - the protection of natural resources and care for the environment are very important to us, which is reflected through the environmentally friendly solutions we apply in our housing estates.

Support - we support foundations, communities and people in need in our surroundings, cooperate with local businesses and participate in local cultural and sporting events.

Responsibility - we act responsibly, choosing local businesses to work with, caring for the environment and managing our business responsibly.

3. Scope and objective of the document:

Long-term business relationships based on transparency and honesty, as well as adherence to mutual agreements and obligations are crucial to the successful and sustainable conduct of business by ROBYG Capital Group.

As one of the market leaders, we constantly strive to achieve the highest standards of doing business and constantly demand that we implement the best solutions. With this attitude, we also meet the expectations of

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our stakeholders. With this in mind, we want to build a culture of shared responsibility and be supportive of our partners in respecting and spreading business practices consistent with the principles of health and safety, human rights, concern for employees and local communities, care for the environment and ethical principles in all aspects of our business.

Therefore, by creating the Business Partner Code of Conduct, we want to integrate the principles of responsible business and sustainable development into our cooperation with our Business Partners as well. The Code is intended to be an integral part of our cooperation with Contractors, also in terms of assessing their qualifications and capabilities.

We believe that this approach based on dialogue and mutual respect between the parties will allow us to develop awareness and build sustainable development and responsible business practices, including among our Partners, which will have a positive impact on the common environment.

We believe that this approach will bring many benefits to us as well as to the wide range of our Stakeholders and the surrounding environment.

The objective of this Business Partner Code of Conduct is to ensure that Contractors of ROBYG Capital Group also act in accordance with all applicable laws and ethical standards and that they comply with the basic rules of cooperation set out in this document.

This Code of Conduct shall apply to all Contractors and their employees and shall form a binding element of any business relationship between ROBYG Capital Group and its Contractors.

ROBYG Capital Group shall reserve the right to adapt and amend this Business Partner Code of Conduct as necessary.

4. General principles:

We are committed to working with the best Contractors, selected according to objective criteria, in order to fully meet the expectations of the social and business environment. By creating and implementing this Code, we strive to develop and promote responsible business practices in the day-to-day conduct of our Contractors, while also setting an example.

Aware of our role and influence on the environment, we strive to deepen and develop good practices among our Contractors in the areas that are key from our perspective, such as:

- the area of ethics and corporate governance (in particular: responsible management, anticorruption, high ethical standards),
- the area of social impact (in particular: care for the health and safety of employees at the workplace, respect for human rights and ensuring decent working conditions),
- the area of environmental impact (in particular: environmental impact, efforts to minimise greenhouse gas emissions, responsible waste management).

5. Compliance with the law and ethical standards:

The Contractor shall comply with all applicable laws and regulations, including generally applicable social and environmental standards, as well as ensure respect for human rights and the protection of human dignity.

The Contractor shall apply the highest ethical standards in every aspect of its operations.

Among its employees and management, the Contractor shall strive to raise awareness of ethical conduct at the workplace (e.g. through training).

The Contractor shall avoid situations that could be interpreted as a conflict of interest or that could pose a reputational risk.

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The Contractor shall refrain from actions that may expose ROBYG Capital Group to reputational damage.

6. Preventing corruption and money laundering:

All requirements stipulated by law regarding the prevention of money laundering shall be complied with. ROBYG Capital Group does not tolerate any form of corruption or business behaviour that could give the impression of undue influence over Employees, Regular Collaborators or Contractors.

The Contractor shall not engage in corrupt practices in the context of its business activities. Upon occurrence of a corrupt incident, the Contractor shall take firm steps to rectify the damage caused and prevent such occurrence in the future, and shall notify the Company of such incident.

7. Occupational health and safety, fair treatment of employees, regular collaborators and subcontractors:

The Contractor shall comply with applicable laws governing occupational health and safety with regard to its employees, regular collaborators and shall provide them with a safe working environment. The Contractor shall strive to minimise and, consequently, completely eliminate accidents, injuries, illnesses or other unfortunate consequences among its employees and regular collaborators resulting from its activities on behalf of ROBYG Capital Group companies. The Contractor shall maintain occupational health and safety records in order to minimise risks and continuously improve safety at work.

In the relations between employees and regular collaborators, the Contractor shall promote dialogue focused on understanding, cooperation and feedback.

Within the limits of its capabilities, the Contractor shall strive to provide its employees with opportunities to participate in trainings to improve their professional skills and job satisfaction.

All employees and regular collaborators of the Contractor shall perform their duties under working conditions which comply with the law; the use of illegal or unethical forms of employment (e.g. illegal labour, child labour, slave labour, forced or otherwise coerced labour) shall not be permitted.

Diversity in the working environment shall be promoted, and the Contractor shall demonstrate respect for diversity at the workplace.

The Contractor shall respect the employees' right of association.

Labour laws and regulations on wages, working time and rest time for employees, regular collaborators and subcontractors shall be complied with.

All forms of discrimination or harassment shall be excluded, such as:

- unacceptable verbal communication (e.g. offensive language, mockery),
- distortion of the working environment (e.g. isolating employees, unrealistic expectations or deadlines for tasks, constant excessive supervision, trivialising achievements),
- psychological manipulation (e.g. unjustified blaming, unjustified criticism, especially in public, disregard for one's own opinions),
- behaviour characterised by violence of any kind.

8. Personal data protection:

Personal data, entrusted to and processed within the framework of the business relationship and joint activities, shall be subject to data protection legislation and shall only be used for the purposes indicated in the contract.

9. Compliance with antitrust laws and principles of fair competition:

ROBYG Capital Group complies with antitrust laws and the principles of fair competition. The Contractor shall comply with the aforementioned regulations, avoid any anticompetitive behaviour, abuse and dishonesty.

10. Environmental impact:

The Contractor shall strictly comply with legal regulations with regard to the environmental impact of its activities.

The Contractor shall make every effort to ensure that the energy it uses is generated with a share of renewable sources.

The Contractor shall seek to minimise the emission of greenhouse gases, including carbon dioxide, resulting directly and indirectly from its activities to an extent appropriate to the scale and type of its operations.

The Contractor shall comply with waste management regulations. The Contractor shall strive to minimise the generation of waste associated with its activities. The Contractor shall ensure proper management of the waste generated, including cooperation with authorised recipients of the waste generated in order to minimise negative impact of the waste on the environment.

The current version of the Business Partner Code of Conduct is communicated to Contractors prior to the conclusion of a contract. In addition, the latest applicable version is available on the intranet.

This Code is not an exhaustive set of standards, therefore, risk assessment shall be carried out in each particular case in order to avoid doubtful or ambiguous situations that could jeopardise the reputation of ROBYG Capital Group companies and Contractors. It should be emphasised that the risk assessment shall address a broader context of the questionable situation and not only the legal analysis resulting from applicable laws (i.e. first and foremost the spirit of the law and not only the letter of the law).

ROBYG Capital Group has a whistleblowing system that offers Contractors, their employees, regular collaborators and subcontractors the possibility to report any suspected or identified violations of the law and internal regulations, also anonymously. Reports can be made to the email address zgloszenia.naruszen@robyg.com.pl or anonymously by completing the form at www.opinie.robyg.com.pl.

No violations of this Business Partner Code of Conduct shall be tolerated. Violations may lead to the Contractor being excluded from future contracting. Proven violations of the presented principles may result in immediate termination of existing business relationships and contracts with subcontractors. Furthermore, ROBYG Capital Group shall reserve the right to claim damages in such a case.

The Management Board of the Company is responsible for reviewing and updating the content of the Code.

This regulation shall be effective as of 26.01.2023.