

PROCUREMENT POLICY:

I. 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. **Personnel** - an employee or individual collaborating with ROBYG Capital Group,
- e. **Employee** - an individual employed at ROBYG Capital Group pursuant to an employment contract,
- f. **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,
- g. **Contractor** - a natural person, legal person or an organisational 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,
- h. **Compliance Officer** - an individual appointed by the Management Board to oversee compliance with the Compliance Policy,
- i. **Management Board** - members of the Management Board and proxies of the Company or a Group Company,
- j. **Supervisory Board** - supervisory board of the Company.

II. Principles of responsible procurement at ROBYG Capital Group:

Fair, resource saving and socially responsible procurement practices are an integral part of ROBYG Capital Group's central procurement strategy. In the long term, ROBYG Capital Group's business activities are closely linked to transparent and long-term relationships with Contractors, compliance with the law, ethical principles, environmental and social standards, healthy and fair working conditions throughout the supply chain and responsible use of materials, products and services.

These cooperation principles are based on the Business Partner Code of Conduct and form an integral part of our business practices and contracts. Further regulations in this regard are contained in our procurement and purchasing guidelines.

Responsibility for procurement generally rests with the Company's Management Board. The departments responsible for development and investment implementation are responsible for the strategic alignment and control of purchasing processes. All Employees and Regular Collaborators shall participate in the implementation of these principles and may make suggestions and recommendations.

The defined targets shall be reviewed by the Management Board at least once a year. The targets and their implementation are published in the Management Board report and reviewed by the Supervisory Board.

III. Individual guidelines:

1. Ethical conduct, social and environmental standards:

ROBYG Capital Group is committed to trustworthy, long-term partnerships. We completely reject corruption, accepting and giving advantages, as well as improper handling of confidential information and documents, and expect the same from our customers and Contractors. We respect human rights, protect the rights of our Employees and Regular Collaborators locally and nationally and condemn all forms of child labour, forced labour and involuntary labour. We respect the dignity of every human being and take our responsibility towards all stakeholders of ROBYG Capital Group very seriously.

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Equally high demands are placed on our Contractors in terms of sustainable behaviour. When selecting our Contractors, we are guided not only by economic efficiency and functional features, but also prioritise criteria related to safety, health, environment, social standards and fair business practices.

We train our Employees, Regular Collaborators and Contractors in the optimal use of our services, products and IT resources and inform them as openly and transparently as possible about the processes taking place in our company.

2. Selection and evaluation of Contractors:

We prefer cooperation with regional or national Contractors (wholesalers, manufacturers, service providers) and are firmly committed to partnership.

A standardised internal tendering process and an objective Contractor selection process guarantees consistent contract quality, compliance with labour law and social aspects, stable prices and long-term product quality. Wherever possible, certified materials from reputable manufacturers are used. If economically viable, environmentally friendly products are preferred, e.g. made from natural raw materials or recyclable materials.

As part of our risk analysis to identify the risks of ROBYG Capital Group at an early stage, Contractors are requested to provide us during the tendering and negotiation phase with more detailed information on their respective management processes and systems. An important instrument in this respect is our Contractor self-assessment, which is a fundamental element in Contractor evaluation and development.

We maintain close and regular dialogue on the source and processing of the resources used. Regular monitoring serves to check the reliability of our Contractors, their quality, price level and environmental performance. In the event of non-compliance with our requirements or violations of our Business Partner Code of Conduct, further steps are considered on the basis of factual analysis.

Proven violations may lead to exclusion from the contract award process or termination of existing business relationships and contracts, as well as claims for damages.

3. Customer and service quality orientation:

Our purchasing management focuses on products, materials and services for our core business of construction of buildings, sale and rental, management and development of our residential property stock. With a strong market orientation, forward-looking, innovative development and quality throughout the product and service chain, we meet the needs and expectations of our customers and provide attractive, affordable housing portfolios and resident friendly neighbourhoods.

All purchasing processes and relationships with Contractors are managed centrally. All secondary processes related to property management are standardised strategically and tactically. The aim is to enable the operating units to purchase in a resource saving, price stable and sustainable manner so that they can focus primarily on their core business of customer and property services. Many housing related services, such as customer service, rental, social management and technical property management, are carried out with our own Personnel. This enables shortening the processing and decision making processes, exploiting synergy effects and improving customer service.

Compliance with all current Polish and European environmental regulations is imperative for us. Any identified or suspected violations of these regulations shall be reported immediately to the Compliance Officer. The existing confidential (i.e. anonymous) communication channel can also be used for this purpose.

IV. Entry into force and publication:

This regulation shall be effective as of 26.01.2023.

The latest applicable version shall be available on the intranet