

SWISS PRIME SITE

Supplier Code of Conduct

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Supplier Code of Conduct

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1 Purpose and scope

The Swiss Prime Site Group is committed to ensuring compliance with the Code of Conduct for Suppliers of the Swiss Prime Site Group. Through its group companies, Swiss Prime Site pursues the goal of adhering to a responsible and customer-oriented procurement policy. This policy is intended to help us meet our financial, environmental and social responsibilities together with our partner companies, our suppliers and their suppliers in turn. In order to offer rental space to our tenants and services to our customers that are produced in an environmentally conscious manner at all times, this Code was approved to supplement the Swiss Prime Site Code of Conduct. It is based on the principles of the United Nations Guiding Principles on Business and Human Rights, and on the Declaration on Fundamental Principles and Rights at Work from the International Labour Organization (ILO).

This Code applies to all suppliers of the Swiss Prime Site Group, and to all its group companies and their directly or indirectly controlled subsidiaries (referred to here as «SPS companies»). They are required to make proactive, systematic efforts to ensure compliance, including by subcontractors providing a service, directly or indirectly, on the suppliers' behalf, for the Swiss Prime Site Group.

2 Expectations placed on suppliers

2.1 Laws and regulations

We expect from all our suppliers that they will comply in full with all applicable laws, directives, regulations and standards, as well as all collective agreements applicable to their business activities, and meet internationally recognised environmental, social and governance (ESG) standards. We also expect that our suppliers will make every effort to implement these standards among their own suppliers and subcontractors. Furthermore, we expect that our suppliers will hold all approvals, licences and registrations necessary for their business activities.

2.2 Business ethics

We expect from all our suppliers that they will promote free competition and maintain high ethical standards in accordance with good business practice. No form of corruption, bribery, money laundering or unauthorised restriction of competition is permitted.

2.3 Information management

We expect from all our suppliers that they will use specific or confidential information about our business activities or our customers for the intended purpose only and will not pass this information to third parties without our consent.

3 Environmental guidelines

Swiss Prime Site and its group companies work actively towards continuously reducing the direct and indirect environmental impact of the Company, and suppliers are obliged to work in accordance with our Environmental Policy. Suppliers are aware of, and have control over, their own environmental impact and strive to achieve ongoing environmental improvements in their business activities. Suppliers take a precautionary approach in the selection and documentation of their products and have a system that ensures waste is disposed of appropriately in order to facilitate reuse and recycling.

Suppliers are responsible for ensuring that their emissions into the air, soil and water are kept to a minimum, and that efficiency improvements are achieved with regard to energy and resource consumption. Additional property-specific requirements (exclusion lists) are incorporated in agreements involving the purchase of construction materials for new build and redevelopment projects.

4 Social guidelines

4.1 Human rights

Suppliers support and respect internationally declared human rights and treat their employees and subcontractors fairly and in a way that reflects the equality of all people.

4.2 Discrimination and oppression

Suppliers ensure that discrimination is avoided in the appointment, wage determination, training, promotion or termination of employees, and that any form of harassment, bullying, intimidation, oppression or other humiliating treatment is prevented.

4.3 Freedom of association

Suppliers respect employees' right to unionise and their ability to participate in collective bargaining without the risk of punishment, intimidation or harassment.

4.4 Conditions of employment

Suppliers ensure that:

- all employees have written employment contracts (in the appropriate national or locally used corporate language);
- all employees are entitled to statutory leave, including sick leave;
- all employees are entitled to weekly periods of rest in accordance with the applicable legislation;
- no deductions are made from wages as a disciplinary measure;
- wage payments are made regularly and punctually, directly to employees and in full;
- no form of wage discrimination occurs.

4.5 Forced labour

Suppliers ensure that no form of forced labour or work associated with any kind of threat or punishment takes place and acknowledge unconditionally that no employee can be forced to deposit valuables or identity documents with their employer (cf. ILO Forced Labour Convention (No. 29) and ILO Abolition of Forced Labour Convention (No. 105)).

4.6 Child labour

Child labour is not permitted. Should there be no legislation against child labour in a country in which business activities are performed, children below the age of 15 years must not be employed (cf. ILO Minimum Age Convention (No. 138)).

4.7 Occupational health and safety

Suppliers ensure that all employees have a safe working environment and take systematic and preventive measures (e.g. training) to promote occupational health.

Accidents and occupational accidents should be prevented. Suppliers are obliged to immediately report any accidents or incidents that occur in the course of work performed on behalf of Swiss Prime Site or one of its group companies. Suppliers must ensure that no alcohol or drugs are consumed during working hours, and that all persons, regardless of their form of employment or type of contract, are insured against accidents in accordance with local regulations.

4.8 Monitoring and compliance

Swiss Prime Site provides training for employees and suppliers in order to raise awareness of ESG standards and to ensure greater transparency concerning the effectiveness of our procurement policy. For this purpose, Swiss Prime Site or a contracted third party is authorised to carry out spot checks on

suppliers in order to assess whether and how the Supplier Code of Conduct is being respected. In addition, Swiss Prime Site informs all suppliers affected by future changes to the Code proactively and at an early stage.

Swiss Prime Site makes all reasonable efforts to support its suppliers in improving their sustainability performance. Should Swiss Prime Site observe any violation of the provisions of this Code, the Company will contact the supplier in question to reach a mutual agreement on measures for improvement and clear deadlines for their implementation. If these measures are not implemented as agreed, Swiss Prime Site may be forced to terminate the business relationship. In the event of severe violations of this Code, Swiss Prime Site reserves the right to terminate the business relationship immediately.

In the event of violations of this Code, suppliers and their employees are also free to submit a report to an independent body. Contact with the Swiss Prime Site Integrity Platform can be made on an anonymous basis.

5 Entry into effect

The Code of Conduct for Suppliers of the Swiss Prime Site Group (Supplier Code of Conduct) enters into effect on 12 February 2021.