

LOGICOR GROUP<sup>1</sup>

## THIRD PARTY CODE OF CONDUCT

As a leading owner, manager and developer of modern logistics and distribution properties in Europe, Logicor has an important role to play in embedding ethical practices and promoting responsible businesses whose values are aligned with ours. Working together, we can build a better future for the benefit of our customers, employees, shareholders, suppliers and society as a whole.

This Code sets out the minimum standards of integrity and conduct we expect of our *Third Parties*, being suppliers at all levels of our supply chain, our customers, shareholders, investors, buyers and sellers of assets and any other parties we do business with.

## OUR COMMITMENT

Logicor is committed to monitoring compliance with this Code. We expect Third Parties to cooperate with us and, when reasonably requested, provide complete and accurate information, complete self-assessments, accommodate mutually arranged site visits and audits by Logicor or our representatives.

We reserve the right to take any action we consider to be reasonable if a Third Party breaches any applicable law, regulation, legal requirement or a standard in this Code. This includes us terminating an agreement with that party where it is deemed by Logicor to be appropriate under the circumstances.

We continuously evaluate the effectiveness and impact of this Code on our supply chain and beyond. The Code shall be regularly updated, and the latest version of the Code will be made available on Logicor's website.

## YOUR COMMITMENT

We expect our Third Parties to share our commitment to adopting a fair, socially responsible and ethical approach to business, and to require the same level of compliance and integrity from their staff and supply chain participants.

Third Parties are required to comply with all applicable laws and regulations and adhere to the principles detailed in this Code as a condition of doing business with Logicor. All Third Parties shall evaluate and monitor their understanding of, and adherence to, these standards, and shall notify Logicor of any breaches or conduct that is not aligned with the spirit of this Code. If they see fit, they shall implement policies, processes, controls, risk assessments, audits, monitoring and training programs to ensure that they remedy and prevent repetition of any breach of this Code.

## 1. RESPECT FOR HUMAN DIGNITY AND WORK

## 1.1 Human Rights

Logicor is committed to uphold and promote fundamental human values that are vital to our social and economic lives and to comply with all applicable human rights laws.

We expect our Third Parties to share this commitment and conduct their business activities in a manner which respects human rights.

## 1.2 Equal Opportunities, Diversity and Inclusion

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<sup>1</sup> Logicor or Logicor Group comprises Eurocor II S.à r.l. (incorporated in Luxembourg with registration number B215.464) and Eurocor III S.à r.l. (incorporated in Luxembourg with registration number B215.465), and the respective direct and indirect subsidiaries of these two entities.

At Logikor, we embrace a diverse and inclusive environment.

We expect our Third Parties to promote equal opportunities in employment and to provide a supportive and inclusive working environment for their staff. As part of their employment practices, Third Parties shall ensure that individuals receive equal treatment regardless of any characteristic or status that is not related to the individual's merit or the inherent requirements of the position they seek. Characteristic or status here refers to race, origin, ethnicity, colour, citizenship, gender identity or expression, age, disability, sexual orientation, religion, political or other beliefs, family or economic status, amongst others.

### 1.3 Anti-Harassment, Bullying and Discrimination

Individuals have the right to work in a setting which is free from any improper behaviour. At Logikor, we seek to create a working environment where inclusion and acceptance are the norm and where mutual trust and respect are promoted.

We expect our Third Parties to provide workplaces that are free from all unlawful discriminatory practices, including harassment, bullying, intimidation, exploitation and similar behaviours. These standards should also be applied to business trips, work-related events and social functions. There shall be zero tolerance for any disrespectful conduct that is demeaning to another person and which undermines the integrity of the relationship between the parties.

### 1.4 Wages, Conditions and Benefits

Third Parties shall comply with all applicable laws and regulations with respect to members of their staff, including in relation to:

- communication of employment terms and conditions;
- working hours and any overtime being within legally accepted maximums;
- pay, adhering to any applicable minimum wage, overtime pay and legally mandated benefits; and
- the legally required number of days leave.

### 1.5 Modern Slavery and Human Trafficking

All practices which involve any deprivation of a person's liberty by another to exploit them for personal or commercial gain are strictly prohibited in Logikor's business and supply chains. Modern slavery is a crime and a gross violation of fundamental human rights. It covers situations where coercion, threats or deceptions are used to exploit victims and undermine their freedom.

Our Third Parties will not engage in or condone within their businesses and supply chains involving Logikor:

- any form of *modern slavery* (including human trafficking; servitude; forced, compulsory, debt bonded, or any other involuntary form of labour); or
- the use of corporal punishments or any other mentally or physically abusive treatment of workers.

Third Parties shall:

- implement and enforce effective systems and controls to ensure that slavery is not taking place anywhere in their businesses or supply chains;
- take all reasonable steps to procure labour, services, goods and materials from sources free of modern slavery while encouraging greater sourcing transparency;
- promote education and awareness of modern slavery risks; and
- upon reasonable request, provide Logikor with traceability data and other relevant information regarding modern slavery risks in their operations and supply chains involving Logikor.

### 1.6 Child Labour

Logicor is opposed to and will not tolerate any form of child labour. We only support legitimate workplace apprenticeship and secondment programs developed for the educational benefit of younger people.

Third Parties shall:

- only employ staff who meet the applicable minimum legal age requirement to work in the country where they operate;
- comply with all applicable laws, regulations and requirements pertaining to hours of work, wages and safe working conditions for authorised young workers;
- not engage suppliers which employ child labour at any stage of the manufacturing or service delivery process in connection with Logicor's business; and
- not subject or condone any child to be exposed to ill-treatment, exploitation or corporal punishment.

#### 1.7 Freedom of Association and Collective Bargaining

At Logicor, we encourage open communication and direct engagement between staff and management to resolve any workplace concerns. Our staff have the right to lawfully establish and join trade unions and any other organisations of their own choosing, and to peacefully associate. We support the right of representative unions and staff to be involved in collective bargaining in accordance with applicable legislation.

We expect our Third Parties to adhere to the same principles.

## 2. OCCUPATIONAL HEALTH, SAFETY AND WELLBEING

Logicor takes the health and safety of our staff, customers and people working at and visiting our premises very seriously. We are committed to achieving high standards of occupational health, safety and wellbeing across the business.

We expect our Third Parties to support us in this commitment by:

- complying with all applicable health and safety legislation;
- employing safe systems of work and ensuring that their staff hold appropriate qualifications, training and knowledge to be fully competent and safe when working on Logicor sites and premises;
- providing all relevant information, briefings and training to their staff in the language they understand; and
- ensuring that workers understand their rights and obligations in relation to unsafe work, their own health and safety and not endangering others by their acts or omissions.

## 3. ETHICAL BUSINESS PRACTICES

### 3.1 Improper Advantage

Corruption causes damage and losses, inhibits business growth and is harmful to the reputation of any business. Logicor has a zero-tolerance approach to bribery and corruption. *Bribes* can include money, gifts, hospitality, reciprocal favours, political or charitable contributions, facilitation payments made to secure or expedite a routine or necessary action, or any other direct or indirect benefit or payment.

Third Parties are expressly prohibited from engaging in any form of fraud, bribery or corruption in relation to Logicor's affairs, including, without limitation:

- offering, promising or giving any bribe, directly or through another party, to anyone in order to: (i) influence any person to do something that is improper; or (ii) obtain or retain any business or advantage;

- soliciting, requesting, accepting or agreeing to receive any bribe as a reward for, or as an inducement to, acting improperly to award any business to Logicor; and
- engaging in any kind of political involvement in connection with Logicor, including the making of any political contributions or being involved in any lobbying activities involving or related to Logicor.

We expect our Third Parties to act in an ethical, fair and professional manner in all business dealings related to Logicor and to:

- comply with all applicable legal and regulatory requirements with regard to bribery, corruption and prohibited business practices;
- immediately reject any improper requests and report them to Logicor's Chief Financial Officer who has responsibility for compliance in this area; and
- conduct regular risk assessments of their internal monitoring systems to ensure that the Third Party's anti-bribery and corruption measures remain appropriate and effective.

Third Parties should contact Logicor's CFO for guidance if there is a suspicion that any unlawful payment may take place, or if they are unsure about any aspect of the conduct expected of them in connection with Logicor's business.

### 3.2 Gifts and Hospitality

We recognise that the polite conduct of business, especially in certain jurisdictions, may involve gifts and hospitality and can help foster positive business relationships. However, the nature, value, and frequency of any gift, hospitality, or entertainment received or given in connection with Logicor's business must always be reasonable.

Third Parties shall not offer, give or accept any of the following on Logicor's behalf:

- any gift, entertainment, sponsored travel, charitable contribution or donation where it might improperly influence anyone's decision in relation to any aspect of their business with Logicor, or be construed as such; and
- any cash (or cash equivalent) gifts in connection with Logicor's business, regardless of value.

### 3.3 Conflicts of Interest

At Logicor, we are committed to identifying and addressing any conflicts of interest that may arise during any business relationship. A conflict of interests may occur when a private interest interferes, or may interfere, with the interests of Logicor, or may impact the work you do for us.

Third Parties are expected to operate conscientiously and objectively in all business dealings, actively avoiding any conflicts of interest. Should a Third Party become aware of an actual, potential or perceived conflict, it must be disclosed to their senior contact at Logicor as soon as possible with a view to finding a mutually acceptable resolution.

### 3.4 Economic Crimes and Money Laundering

Logicor does not tolerate financial or economic crimes such as money laundering, terrorist financing, fraud or tax evasion. Logicor defines *money laundering* as the process by which proceeds from illegal activities are disguised to appear to be from legitimate sources. This includes concealing, acquiring, using, or possessing such proceeds or facilitating their acquisition, use, retention, or control.

Third Parties shall not be involved in any arrangement that facilitates or may constitute Logicor being involved, directly or indirectly, in economic crime or any other illegal activity.

Third Parties shall have in place effective policies, procedures, regular training and Board level or managerial responsibility for inadequate measures which seek to prevent any money laundering, tax evasion or other financial and economic crimes from occurring.

### 3.5 Insider Trading

Members of staff who have access to non-public information regarding Logikor are not permitted to use or share such information for any purpose except the conduct of Logikor's business. Logikor defines *inside information* as information about an entity (including strategic developments, financial forecasts, acquisitions and disposals, key personnel changes, valuation expectations, and any contentious matters) which is not yet publicly known. To use such non-public information for personal financial benefit or to advise those who might make an investment decision on the basis of that information is both unethical and a criminal offence. Such conduct will not be tolerated by Logikor.

Third Parties shall not engage in any inappropriate procurement or disclosure of Logikor's inside information, regardless of how that information was obtained. A Third Party in possession of any inside information about Logikor shall not buy or sell, or recommend that another person buys or sells, any securities of Logikor.

### 3.6 Competing Fairly

At Logikor, we are committed to fair competition. In driving the success of our business, we only seek competitive advantage through legal and ethical business practices.

Third Parties shall act in compliance with all competition and antitrust laws and regulations applicable to them. They shall refrain from entering into any formal or informal agreement which may have an effect of unlawfully restricting competition and shall not engage in price fixing of any sort or allocate markets, clients, or services when acting for or on behalf of Logikor.

### 3.7 Trade Sanctions

Third Parties shall adhere to all domestic, regional and international sanctions laws with which the Third Party or Logikor must comply. A Third Party shall not: (i) engage, directly or indirectly through any supply chain participant, in any business activity with; or (ii) include in Logikor's supply chain any services, goods or materials sourced from, any sanctioned person, country or organisation.

### 3.8 Local Communities

At Logikor, we believe that we can make a notable positive difference to the local communities by striving to create a balanced, sustainable economy that everyone can be a part of. Our asset management teams are based locally, ensuring a close connection with our customers and their communities. This involvement enables us to take actions that directly benefit and support them, such as engaging local service providers.

We strongly encourage our Third Parties to work in collaboration with us to further these aims while ensuring that our respective supply chain activities do not adversely impact communities where we have a presence.

## 4. INFORMATION MANAGEMENT, SECURITY AND CONFIDENTIALITY

Information is a valuable corporate asset. Logikor respects and protects personal and other confidential or sensitive information, whether it is proprietary or has been entrusted to us by others. All non-public information should be considered *confidential information*. It includes, without limitation, information concerning Logikor's business affairs (e.g. current and prospective customers, assets, investors, suppliers), the financial and technical information concerning our assets (e.g. rents, renewals, expenses, financial projections, upcoming projects, asset maintenance matters), non-public financial reports, strategies, as well as organisational documents (e.g. policies, procedures, processes, risk assessments, questionnaires,

training materials), personnel matters and, more generally, any information related to Logikor's business plans.

It is critically important to Logikor that Third Parties maintain the confidentiality and integrity of any personal or confidential information that is shared with them, regardless of the form in which it is shared. When it comes to Logikor's confidential information and personal data, Third Parties shall:

- use all appropriate IT security and other methods to ensure that it is protected against unauthorised or unlawful processing, disclosure, access, loss, alteration, damage and destruction (e.g. physical loss, privacy breach, cyber incident);
- only use it to provide services to Logikor in accordance with the agreed terms and all applicable laws and regulations;
- not process or allow others to process any of Logikor's personal data outside of the European Economic Area without our prior written consent; and
- inform Logikor without delay of any incident that has or may reasonably result in a breach of confidentiality or the protections relating to personal data by the Third Party, their staff or supply chain participants.

## 5. ENVIRONMENTAL STEWARDSHIP

As one of the largest owners and operators in the European logistics sector, Logikor has a key role to play in tackling climate change and we embrace this responsibility. By working closely with our customers, colleagues, suppliers and other stakeholders, with solutions and action, together we can make a real difference in reaching relevant climate targets.

### 5.1 Logikor's Carbon Reduction and Climate Resiliency Targets

In our dedicated Environmental, Social and Governance or ESG report entitled *Acting responsibly for a sustainable future*, we set our 5 year strategy and roadmap. In 2022 we published our sustainability targets, focused on areas where we can have a direct impact and the most influence.

We have two main areas of focus, the first of which is reducing carbon. This is supported by a target to reduce our carbon footprint by 36% by 2030 using the Science Based Targets initiative's methodology. By working together with our customers, we can reduce our carbon footprint while helping our customers to do the same and improve energy efficiency of our warehouses.

Our other key focus area is on climate resiliency. We have committed to becoming a climate resilient business by 2030 and have adopted the Task Force on Climate-Related Financial Disclosures' (TCFD's) recommendations in order to help us achieve that.

### 5.2 Working Together to Make a Difference

To make the most of the influence we have, Logikor expects our Third Parties to support us in achieving these targets by:

- continuously assessing and managing environmental impacts of their operations, including the sustainable use of natural resources, effective management of greenhouse gas emissions and waste;
- setting their own sustainability targets and reporting against them;
- informing us at the earliest opportunity of any significant environmental incidents and/or breaches at any Logikor-owned or managed assets; and
- collaborating and cooperating with us with a view to achieving Logikor's and the Third Party's sustainability goals and objectives, including driving sustainability performance of Logikor's assets.

## 6. SPEAKING UP

At Logikor, we conduct our business with honesty and integrity, and strive to work with Third Parties whose

values are aligned with ours. We want to do the right thing by our staff, customers, shareholders, investors, service providers and local communities.

Committed to fostering a culture of openness and accountability, we welcome any concern involving Logikor being brought to the attention of our management. In this context, your concern may relate to any actual or suspected breach of this Code or any applicable law, regulation, professional and ethical standard by anyone connected to Logikor. Speaking up in good faith when you become aware of, or suspect, wrongdoing demonstrates integrity and courage to do the right thing.

Third Parties can raise a concern involving Logikor in one of the following ways:

- With your relationship contact at Logikor who will report it to the suitable member of our senior management team for investigation as may be appropriate.
- Via [Safecall](#), our dedicated, confidential, external whistleblowing channel available to you 24/7. A report can be made online via [www.safecall.co.uk/report](http://www.safecall.co.uk/report) in any language or via an international freephone number [+44 191 516 7749](tel:+441915167749) where an interpreter can be requested. If your local laws permit it, you can choose to make an anonymous or a semi-anonymous report.

Any report will be treated in a confidential manner to the extent legally permitted and will be properly investigated by senior individuals who are not implicated in any alleged wrongdoing. Any individual who raises a genuine concern will be treated with respect and will not suffer any detrimental treatment or retaliation, even if they turn out to be mistaken.

#### FURTHER INFORMATION

We are interested in your questions and feedback, which you are welcome to share with us by email at [info@logikor.eu](mailto:info@logikor.eu).