

## **User Policy**

### **Respect human rights within and outside our company**

Updated: 17.02.2021

#### **Introduction**

This policy applies to all Aroundtown employees, including management and supervisors, who, for the purpose of simplification, shall be covered by the term "employees" in this policy. The term employee therefore covers all genders. Where the masculine form is used in this document, this is for simplicity and readability. Although we at Aroundtown SA and controlled entities (hereinafter collectively referred to as "Aroundtown") assume that all employees will always be guided by company values and the company's Code of Conduct, this policy provides additional advice to support a corporate culture characterized by recognition and diversity.

#### **Scope of this policy**

It is expected that each employee will read and comply with this policy. Aroundtown's stakeholders (Stakeholders are individual persons or groups of persons who have a legitimate interest in the company), are informed about this procedure through our non-financial report and website.

#### **Commitment**

As one of the leading real estate companies in Europe, with a steadily growing number of employees, we are aware of our responsibility to fully respect and uphold human rights, both within the Group and with our external stakeholders, always and without exception, and in every place where we operate, in accordance with the UN Guiding Principles on Business and Human rights and international standards. Although these standards are covered by law and regulations in each country Aroundtown currently operates in, Aroundtown respects and promotes human rights throughout the organization with our policies and procedures. If Aroundtown will operate in areas with a risk of human rights violations in the future the company is committed to undertake human rights due diligence and conduct risk assessments.

We regard every person as unique and recognize our individual differences such as ethnic origin, gender, religion or belief, experience, physical and mental abilities, age, or sexual identity. We expect this from each individual employee as well as from each of our customers and business partners.

#### **Aroundtown SA**

40, rue du Cure + L 1368 Luxembourg

T +352 288 313 + F +352 28 57 74 28 + info@aroundtown.de + www.aroundtown.de

Board of Directors: Mr. Frank Roseen, Ms. Jelena Afxentiou, Mr. Ran Laufer, Mr. Markus Leininger,

Ms. Simone Runge-Brandner, Mr. Markus Kreuter.

R.C.S. Luxembourg + B217868

## List of Human Rights

Aroundtown's policies and procedures respect human rights within the company's operations and including the supply chain such as:

✓ Right to equality	✓ Right to a safe work environment
✓ Freedom from discrimination	✓ Right to political engagement
✓ Right to security of person	✓ 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	✓ Right to privacy, rest, and leisure

## Tenants

Aroundtown seeks to respect the human rights of our tenants in all the countries and regions that we operate. Our main focus areas include: respecting the privacy of our tenants e.g. by safe storing of any personal data, as described in our Privacy Policy; and aiming for that no customers are discriminated. In addition, we strive for that our marketing is done with respect for the views of our stakeholders by not aiming to communicate any specific ideal, but rather a range of styles, attitudes, and ethnic backgrounds.

## Expectation from workforce / contractors

Aroundtown's values are embedded in the company's guiding principles (integrity, respect, performance, accountability, sustainability). We expect our workforce and contractors to respect human rights and operate in an ethical manner.

## Expectation from suppliers / contracted partners

We expect from our suppliers / contracted partners to comply with Luxembourg laws and international human rights standards. Our Green Procurement Policy gives preference to suppliers that share our commitment to sustainability and the protection of human rights.

We only work with companies and business partners who subscribe to and recognize our "Code of Conduct for Business Partners", to ensure the obligation to be aware of and deal with industry-specific human rights violations.

## **Monitoring and Control**

Should you unexpectedly become aware of violations and/or infringements of internationally applicable human rights, or have a reasonable suspicion of such, you are requested to report this immediately to your superior, the Compliance Department or the Humans Resources. A hint, suspicion or actual violation reported by the employee shall not lead to consequences under labor law for the reporting person. Every report is treated anonymously and confidentially, unless a criminal offence makes the naming of witnesses - by law - unavoidable.

If violation to human rights is monitored outside Aroundtown's own operations, we are committed to provide remedy to correct negative impacts.

All reported violations are reported to the CEO and a member of the board of Directors (currently by the director) and recorded in the compliance department. Reported violations are brought to the attention of the management in regular meetings as part of a risk assessment for the company. Aroundtown is committed to report about human rights violations as part of the non-financial reporting on a yearly basis.

## **Approval of guidelines and policies**

Both the internal Code of Conduct and the Code of Conduct for Business Partners, like all other company guidelines, are always reviewed and approved by Aroundtown's CEO as well as a member of the Board of Directors before they come into force.

**Berlin, February 17, 2021**

**Barak Bar-Hen**  
Co-CEO / COO

**Frank Roseen**  
Director