

Code of Business Ethics and Conduct (COBEC)

By Jawa Corporate Real Estate Solutions B.V.

Effective Date: November 10th, 2024 Review Date: November 10th, 2024

1. Introduction

At Jawa Corporate Real Estate Solutions B.V., we are committed to conducting our business with the highest standards of integrity, professionalism, and respect for all stakeholders. This Code of Business Ethics and Conduct (COBEC) outlines the principles and guidelines that govern the actions and behaviors of all employees, officers, and directors of Jawa, as well as third-party representatives, contractors, and consultants.

Our business conduct is guided by the values of honesty, fairness, transparency, and respect for people, laws, and the environment. We expect all individuals associated with Jawa to adhere to these principles in all aspects of their work, fostering a positive corporate culture and maintaining the trust of our clients, partners, employees, and communities.

2. Principles of Ethical Conduct

Jawa aims to ensure Ethical Conduct through:

- Integrity and Honesty: We will act with integrity in all our dealings, both internally and externally. We will be truthful, fair, and transparent in all communications, ensuring that we meet or exceed legal and ethical standards.
- Respect for People: We treat every individual with dignity and respect. Discrimination, harassment, or any form of unethical treatment is not tolerated within our company. We support diversity and inclusion in the workplace.
- Compliance with Laws and Regulations: We comply with all applicable local, national, and international laws, including environmental, health and safety, labor, and anti-corruption laws. Employees are required to familiarize themselves with relevant laws and seek guidance when needed.
- Confidentiality: We respect the confidentiality of company information and that of our clients, partners, and employees. Sensitive data, intellectual property, and trade secrets should not be disclosed without proper authorization.
- Conflict of Interest: Employees should avoid situations where personal interests conflict with professional duties or the interests of the company. Any potential conflicts of interest must be disclosed to management immediately.
- Responsible Business Practices: We promote sustainable business practices that consider the environmental impact of our operations and seek to contribute



positively to society. We strive for long-term value creation, not short-term gains at the expense of ethics.

3. Reporting Unethical Conduct

We encourage a culture of openness where employees feel safe reporting unethical conduct without fear of retaliation. If any individual becomes aware of violations of this Code or any legal or regulatory requirements, they should report the matter to their supervisor or the Ethics Committee.

• Whistleblower Protection: Jawa provides mechanisms for confidential reporting of unethical behavior. Retaliation against individuals who report misconduct is strictly prohibited.

4. Disciplinary Action

Failure to comply with this Code of Ethics and Conduct may result in disciplinary action, including termination of employment or contracts, legal action, or other appropriate consequences. The severity of the action will depend on the nature of the violation.

Conclusion

At Jawa Corporate Real Estate Solutions B.V., we are committed to maintaining a culture of ethics, integrity, and transparency. This policy provides clear guidelines to ensure that we maintain the highest standards of professional conduct in our business relationships and daily operations.

Jeroen Lubbers Managing Director Jawa Corporate Real Estate Solutions B.V.

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