

Human Rights and Ethical Employment Policy

By Jawa Corporate Real Estate Solutions B.V.

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

1. Introduction

Jawa Corporate Real Estate Solutions B.V. ("Jawa" or "the Company") is committed to upholding the highest standards of human rights and ethical employment practices in every aspect of our business. As a responsible corporate entity based in The Netherlands and primarily operating across Europe, we recognize the importance of ensuring that our activities do not contribute to any form of human rights abuse, and that we foster an environment that respects the dignity, equality, and rights of all individuals.

This policy outlines the Company's commitment to preventing child labor, forced labor, modern slavery, discrimination, and sexual harassment. These principles are in line with international human rights standards, including the Universal Declaration of Human Rights (UDHR), the International Labour Organization (ILO) conventions, and applicable European Union directives.

2. Scope

This policy applies to all employees, contractors, business partners, and suppliers of Jawa Corporate Real Estate Solutions B.V. across all locations and business operations, including our real estate services, projectmanagement activities, and related services. We expect our suppliers and partners to adhere to these principles and to actively promote human rights and fair labor practices within their own organizations.

3. Core Principles

Jawa is fully committed to the following human rights principles:

A. Prohibition of Child Labor

- <u>No Employment of Minors</u>: Jawa prohibits the employment of individuals under the legal minimum age required for employment in any jurisdiction in which we operate. In accordance with ILO Convention No. 138, we ensure that employees are of the legal age to work, and we maintain a strict policy against the use of child labor.
- <u>Youth Employment</u>: We comply with all laws regarding the employment of minors, ensuring that any youth employment within our organization adheres to international standards for working hours, safety, and conditions.



B. Prohibition of Forced Labor and Modern Slavery

- <u>Voluntary Employment:</u> Jawa is committed to ensuring that all employment is voluntary. We do not tolerate any form of forced, bonded, or involuntary labor within our operations or supply chains. All employees are free to leave their employment in accordance with their contractual terms and local labor laws.
- <u>No Modern Slavery</u>: We take a zero-tolerance approach to modern slavery, including human trafficking, forced labor, and any other form of exploitation. We will not tolerate any practice within our company or supply chain that forces or coerces individuals into working under duress.
- <u>Supply Chain Accountability</u>: We require all suppliers and business partners to adhere to this standard and to provide transparency in their operations, particularly in relation to the treatment of workers and labor conditions.

C. Equality, Non-Discrimination, and Equal Opportunity

- <u>Equal Treatment:</u> Jawa is committed to creating an inclusive workplace that offers equal opportunities to all employees, regardless of race, ethnicity, nationality, religion, gender, gender identity, sexual orientation, age, disability, or any other protected characteristic.
- <u>Non-Discrimination</u>: Discrimination of any kind, whether in recruitment, hiring, promotion, compensation, or training, is strictly prohibited. We aim to provide fair and equal treatment for all employees and applicants, and to foster a diverse and inclusive work environment.
- <u>Affirmative Action:</u> Jawa will continue to promote diversity and inclusion through recruitment practices, career development programs, and employee engagement efforts, ensuring that people from diverse backgrounds have equal opportunities to succeed within the Company.

D. Prohibition of Sexual Harassment and Workplace Violence

- <u>Zero Tolerance for Harassment:</u> Sexual harassment, bullying, and any form of workplace violence or misconduct are strictly prohibited at Jawa. We are committed to maintaining a safe, respectful, and professional environment where all employees are treated with dignity and respect.
- <u>Reporting and Investigation:</u> Any incidents of sexual harassment, bullying, or any inappropriate behavior will be treated seriously. Employees are encouraged to report any concerns or grievances, which will be handled confidentially and promptly investigated. Jawa will take appropriate corrective actions, including disciplinary measures, where necessary.
- <u>Respect and Safety:</u> We are committed to providing a safe, respectful, and inclusive workplace where all employees, contractors, and visitors are protected from any form of harassment, violence, or intimidation.

4. Implementation and Responsibility

To ensure this policy is effectively implemented, the following measures will be taken:



- <u>Training and Awareness</u>: All employees will receive regular training on human rights principles, including awareness of issues related to child labor, forced labor, discrimination, sexual harassment, and ethical conduct in the workplace. This training will also be extended to new hires and relevant stakeholders.
- <u>Employment Practices and Recruitment:</u> All recruitment practices at Jawa will be carried out in accordance with this policy. We will ensure that job advertisements, hiring procedures, and onboarding practices are fair, transparent, and non-discriminatory. Our hiring process will always verify that candidates meet the legal age for employment and that employment contracts are entered into voluntarily.
- <u>Contractual Obligations for Suppliers:</u> We require all suppliers and contractors to comply with the principles outlined in this policy. Contracts with third parties, including suppliers and business partners, will include specific clauses related to human rights, labor conditions, and ethical practices. Failure to comply with these standards may result in termination of business relationships or contracts.
- <u>Reporting Mechanisms and Grievances</u>: Jawa has established clear and accessible channels for employees to report any concerns or violations related to human rights or ethical practices. Employees can report violations confidentially and without fear of retaliation. All reports will be investigated thoroughly, and appropriate actions will be taken to address any violations.
- <u>Monitoring and Auditing</u>: The Company will conduct regular audits of its operations and supply chains to ensure compliance with this policy. This includes monitoring our suppliers' and contractors' adherence to labor standards and human rights regulations.

5. Consequences of Violations

Violations of this Human Rights and Ethical Employment Policy will not be tolerated. Any employee found to be engaging in practices such as child labor, forced labor, discrimination, harassment, or any other form of unethical behavior will face disciplinary action, up to and including termination of employment. Similarly, any supplier or business partner found to be in violation of this policy may have their contracts terminated.

In cases of serious violations, the Company may cooperate with relevant authorities, including law enforcement, to address violations of human rights and labor laws. This may include reporting suspected cases of modern slavery, human trafficking, or other illegal activities to the appropriate legal authorities.

6. Commitment to Continuous Improvement

Jawa is committed to continually reviewing and improving its practices to ensure the protection of human rights within its operations and supply chains. We will regularly assess the effectiveness of this policy, keeping it up-to-date with changes in laws, regulations, and industry best practices. We also encourage feedback from employees and stakeholders to



improve our human rights initiatives and strengthen our commitment to ethical business practices.

7. Conclusion

Jawa Corporate Real Estate Solutions B.V. is dedicated to fostering a fair, safe, and inclusive workplace, free from exploitation, discrimination, and harassment. By adhering to these principles, we aim to create an environment where all individuals are treated with respect and dignity, and where human rights are respected and upheld in every aspect of our business operations.

This policy will be reviewed periodically to ensure it reflects evolving standards, legal requirements, and best practices in human rights and employment ethics. All employees, contractors, and business partners are expected to fully understand and comply with this policy to uphold Jawa's commitment to responsible and ethical business practices.

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

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