



Policy Statement on Local and International Anti-Trust and Competition Laws

By Jawa Corporate Real Estate Solutions B.V.

Effective Date: November 10th, 2024

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1. Overview

Jawa Corporate Real Estate Solutions B.V. ("Jawa" or "the Company") is committed to maintaining the highest standards of legal and ethical conduct in all of its operations. As a company based in The Netherlands and primarily operating in Europe, we recognize the critical importance of adhering to local, national, and international anti-trust and competition laws. These laws play a key role in promoting fair competition, preventing monopolistic practices, and ensuring transparent and equitable market conditions across the real estate industry.

We are dedicated to compliance with the EU competition law framework and national competition regulations within the jurisdictions in which we operate. This includes the European Union's Treaty on the Functioning of the European Union (TFEU), and relevant regulations such as Regulation (EC) No 139/2004 on mergers and acquisitions, as well as the competition laws of individual EU member states and other countries where our activities extend.

2. Commitment to Compliance

At Jawa, we take our responsibility to comply with competition laws seriously, understanding that anti-competitive behavior undermines the integrity of the market, distorts competition, and can harm customers, clients, and our reputation. We are committed to ensuring that our business activities do not violate the following principles:

Local and National Compliance: Jawa will comply with Dutch competition law, as enforced by the Netherlands Authority for Consumers and Markets (ACM), and the competition laws of other EU member states where we operate. We will also adhere to the relevant legal provisions in any non-EU countries in which we conduct business.

European Union Competition Law: As a company operating within the European Union, we commit to fully abiding by EU competition law, including Articles 101 and 102 of the TFEU. This means avoiding anti-competitive agreements with competitors, suppliers, or customers, and refraining from abusing any dominant position in the market.



International Compliance: Where applicable, we will also comply with international competition law frameworks, including regulations enforced by global bodies such as the European Commission, U.S. Federal Trade Commission (FTC), and relevant authorities in other countries in which we may have business interests.

3. Prohibited Practices

We strictly prohibit the following practices, which are in violation of anti-trust and competition laws:

- A. Cartels and Price-Fixing: Any agreement or concerted practice with competitors or suppliers to fix, raise, lower, or stabilize prices in the market for real estate services or related products.
- B. Market Allocation: Agreements with competitors or suppliers to divide or allocate markets, customers, or territories in a way that restricts competition.
- C. Bid Rigging: Collusive agreements with other businesses to fix the outcome of competitive bidding processes, including the manipulation of tender offers and contract negotiations.
- D. Abuse of Dominance: Exploiting a dominant market position by engaging in exclusionary or discriminatory practices, such as predatory pricing, refusal to supply, or tying arrangements that harm competition or consumers.
- E. Exclusive Dealing and Tying: Imposing conditions on clients or suppliers that unfairly restrict their freedom to do business with others, or requiring them to purchase additional products or services as a condition for a real estate transaction.

4. Responsibilities and Training

All employees, management, and directors of Jawa have a personal responsibility to comply with this policy and the relevant competition laws. To ensure compliance:

- We will provide regular training on anti-trust and competition laws, emphasizing the risks associated with anti-competitive conduct and the importance of following the law.
- We will also promote a culture of transparency and accountability in our business dealings, ensuring that all staff understand the legal framework and company guidelines.

5. Monitoring and Enforcement

Jawa will regularly monitor its business activities and interactions to detect and prevent any potential violations of anti-trust and competition laws. This includes:

- Conducting periodic internal audits and reviews of business practices to ensure compliance with legal requirements.

- Taking immediate corrective action if any behavior inconsistent with this policy is identified, including reviewing and modifying business practices or contractual arrangements that may raise competition concerns.

Any breach of this policy will be addressed promptly and could result in disciplinary actions, including termination of employment, and could involve legal penalties, fines, or other sanctions imposed by relevant competition authorities.

6. Cooperation with Authorities

Jawa is committed to cooperating fully with any investigations or inquiries by competition authorities, including the European Commission, the Netherlands Authority for Consumers and Markets (ACM), and other relevant bodies. Should we be involved in any investigation or enforcement action, we will work closely with legal counsel to ensure that we handle the matter appropriately and respond in a timely and transparent manner.

Conclusion

Jawa Corporate Real Estate Solutions B.V. is dedicated to fostering a competitive, fair, and transparent real estate market in all the jurisdictions in which we operate. By adhering to local, national, and international competition laws, we aim to promote innovation, protect consumers, and ensure long-term success in a compliant and ethical manner.

This policy will be reviewed periodically to ensure continued compliance with evolving legal standards and industry best practices. All employees and stakeholders are expected to understand and adhere to these guidelines in order to uphold Jawa's commitment to ethical business conduct.



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