

EUROCOMMERCIAL PROPERTIES N.V. - HUMAN RIGHTS POLICY

We believe that the basic rights and freedoms to which all people are entitled should be understood, respected, and promoted by all companies as the cornerstone of sustainable business. Only this way can we create brighter lives for all.

1. Our commitment

Respecting human rights is a prerequisite for doing business responsibly. Eurocommercial embraces the responsibility to respect human rights across all our operations, through our relationships with other businesses and in the communities in which we operate.

We are committed to respecting and adhering to internationally recognized human rights, as set out in the International Bill of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. Moreover, we follow and implement the United Nations Guiding Principles for Business and Human Rights (UNGPs) and we subscribe to the expectations expressed in the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

We are committed not to be complicit in human rights violations and will take all necessary measures to ensure that we are not involved, directly or indirectly, in any violations of internationally recognized human rights. We expect our business partners to make the same commitments and to act accordingly.

We acknowledge that we operate in countries where the implementation of international human and labour rights standards may differ with domestic law. In these cases, we will strive to adhere to whichever standard is higher, and in situations of conflict between international norms and domestic law, we will strive to honour the spirit of international human and labour rights.

2. Human Rights

Eurocommercial respects and upholds the human rights of both direct and indirect workers. We are committed to providing fair remuneration, safe and healthy working conditions, and aligning our practices with internationally recognized standards.

In particular, we adhere to the ILO's four core labour standards:

- **Freedom of association and the right to collective bargaining**
We respect and support the right of workers to freely form and join trade unions and to engage in collective bargaining. We encourage open dialogue between employees and management to promote fair and constructive workplace relations.
- **Elimination of all forms of forced or compulsory labour**
We categorically oppose any form of forced, bonded, or involuntary labour. Employment with Eurocommercial must always be based on free choice, with workers having the right to leave their employment in accordance with legal and contractual obligations.
- **Abolition of child labour**
We do not tolerate child labour in any form. We ensure strict compliance with international standards to protect children's rights, focusing on safeguarding their health, education, and development.

- **Elimination of discrimination in respect of employment and occupation**
We are committed to equal opportunities and fair treatment for all workers. Discrimination based on race, gender, religion, age, disability, sexual orientation, or any other status is not accepted in any part of our operations or supply chain.

In addition to these four core standards, Eurocommercial also upholds other internationally recognized human rights related to working conditions, including:

- **Fair remuneration**
We ensure that all employees and contracted workers receive wages that provide a decent standard of living, in line with or exceeding legal and industry standards.
- **Safe and healthy working environment**
We provide workplaces that prioritize health, safety, and wellbeing, implementing measures to prevent accidents, injuries, and occupational risks.
- **Just and favourable conditions of work**
We respect workers' rights to reasonable working hours, rest periods, and paid leave, ensuring conditions that foster dignity and balance between work and private life.

Following the United Nations Guiding Principles on Business and Human Rights (UNGPs), we have a responsibility to prevent, mitigate, and address adverse human rights impacts, and to use our leverage to encourage our suppliers and business partners to respect human rights issues.

Eurocommercial's commitment to respect and promote human rights is integrated into various operating policies. We will exercise our leverage in order to address an adverse human rights impact. All Eurocommercial employees are expected to follow the Eurocommercial Code of Business Conduct, which is available on the company website. Employees receive regular training on values and business principles per the framework requirements.

We also set clear expectations for the suppliers and vendors we work with across our value chain to prevent potential risks from becoming reality, as laid out in the Eurocommercial Supplier Code of Conduct. Our staff is trained to educate suppliers on our Supplier Code of Conduct and have been trained to know how to act when suppliers are not compliant. We will support our operations in converting this policy and roadmap into practical tools by developing relevant human rights guidelines. We will continuously update these guidelines based on revisions and stakeholder engagement.

3. Monitoring and human rights assessment

Eurocommercial Properties assesses the human rights impact on a regular basis as part of its ongoing due diligence responsibilities. These assessments are conducted through monitoring compliance with applicable regulatory frameworks and reviewing performance data relevant to human rights and labor standards.

In addition, we actively monitor our supply base both on-site—through supplier visits, audits, and inspections—and via direct reporting mechanisms such as sustainability assessments and performance reviews. Eurocommercial expects its suppliers to adhere to our Supplier Code of Conduct and to maintain processes to prevent, mitigate, and remediate any human rights impacts they may cause or contribute to.

4. Grievance mechanisms and remedy

Eurocommercial is committed to providing our stakeholders with various means of reporting (potential) human rights violations. We believe that having proper grievance mechanisms in place is crucial to better identify and address (potential) violations at an early stage and act accordingly. We encourage our employees to raise any concerns – including human rights issues – to their managers, colleagues in Human Resources or trusted representatives. Where this is not considered appropriate, complaints can directly be made to the Eurocommercial Compliance Officer.

People wanting to voice their concern should be able to do so freely and without retaliation. We want to emphasize that retaliation against a person for reporting their grievance is a serious violation of our values and way of working. Should this occur, the violator will be subject of appropriate disciplinary sanctions.

We are continuously working to improve our capacity to identify, investigate, and take appropriate corrective action should illegal practices or violations of adopted policies occur. Therefore, we cooperate with all legitimate remediation efforts, such as administrative or judicial processes.

5. Stakeholder Engagement

Eurocommercial is fully aware that identifying human rights risks and developing a robust due diligence process requires ongoing improvement. Moreover, human rights are not a topic we can address alone. We need to work with multiple internal and external stakeholders such as governments, NGOs, employees, suppliers, customers and communities. Together, we can exchange knowledge, build leverage and address human rights that may be at risk. We will keep engaging with stakeholders and act on findings so that we can address human rights in line with our learnings.

We believe human rights defenders play a critical role in drawing attention to issues that may otherwise remain uncovered and strive to cooperate with our stakeholders to safeguard human rights defenders' freedom to let their voices be heard.

Eurocommercial aims to be as transparent as possible to its stakeholders, and thinks it is important to regularly engage with stakeholder groups on the topic of human rights. In order to leverage our potential positive impact on human rights, Eurocommercial is constantly seeking opportunities to support human rights by engaging and collaborating with like-minded organizations that contribute to our purpose of creating brighter lives for all.

We provide training to our employees on this policy and our Code of Business Business Conduct on a regular basis.

6. Governance

The ESG Committee, which includes all members of the Board of Management and the Group Director Legal, is responsible for overseeing the Company's ESG strategy and regularly updating the Supervisory Board. The committee ensures that the Company's ESG performance aligns with its long term targets, embeds ESG principles across teams and countries, and oversees the

implementation of the strategic framework. It holds final responsibility for all ESG-related topics, including climate change risk assessment, environmental performance, socioeconomic impact, diversity and inclusion, human rights and other key sustainability matters outlined in this chapter.

The day-to-day responsibility for human rights at Eurocommercial sits with our Group Director Legal, who reports to the CEO.
