

Business Integrity Principles

Redevco Business Principles RBP#16
May 2025



Amsterdam, April 2025

Dear colleagues,

Our mission is clear: **building value for investors and enriching communities through transformative real estate**. Our heritage, commitment, and expertise help us achieve our mission, working in close collaboration with our tenants and investors.

We recognise that the world has become increasingly complex in recent years. Our markets are evolving rapidly, and geopolitical risks are on the rise. With these challenges come significant opportunities to fulfil our mission.

In such turbulent times, it is vital to adhere to clear rules and principles. We are committed to acting ethically, legally and with the highest integrity in all our business dealings, without exception.

The standards we want to adhere to in the way we do business are set out in this document. This document not only outlines our rules and principles but also provides support to help you live up to them every day. They form the core of our internal control framework and apply to everyone in the company.

If you have questions about the Business Integrity Principles or their application, or if you need help with ethical issues, please contact me or the Governance, Risk and Compliance Team.



Neil Slater
CEO

Amsterdam, April 2025

Dear colleagues,

At Redevco, our values—Trust, Passion, and Performance—are at the heart of everything we do. They guide us to make the right decisions and act with integrity in every situation. These values are the foundation of our Business Integrity Principles, which shape how we work every day. By following these principles, we build trust, strengthen our relationships, and protect our reputation, ensuring we're always doing our best.

If you have any questions about the Business Integrity Principles or need guidance in a challenging situation, please do not hesitate to contact me or my team. In addition, our Speak Up Policy is always available if you suspect a violation of these Principles or other Redevco Policies. We promise that all concerns will be investigated fairly, promptly, and professionally.

Let us work together to ensure that we conduct our business responsibly, with integrity and in accordance with our principles. By doing so, we all contribute to the sustainable success of Redevco.



Albert Weenink

Head of Governance, Risk & Compliance

1. Guiding Principles

Doing the Right Thing — Every Time

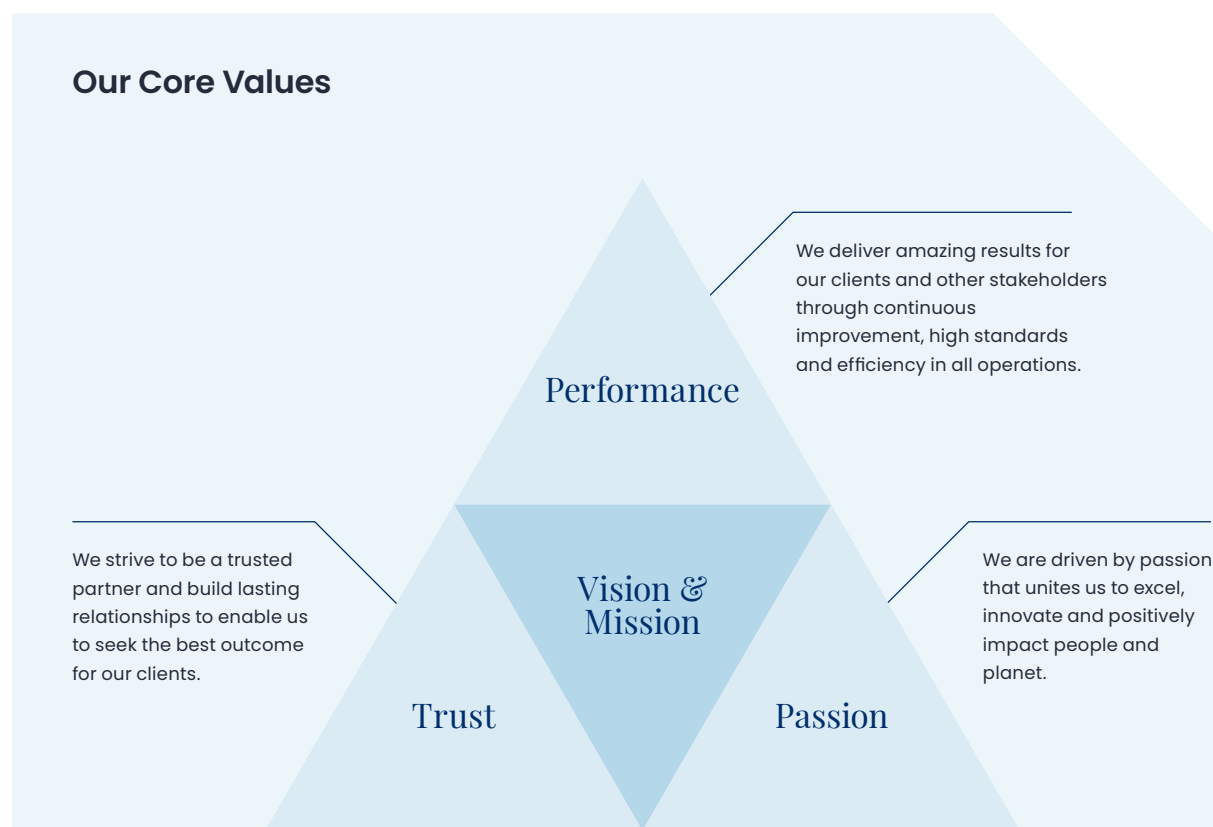
These **Business Integrity Principles (BIP)** apply to **everyone at every level** including temporary workers at Redevco. They are based on our values – **Trust, Passion and Performance** and set clear expectations for how we work, make decisions, and interact with others.

- If something feels wrong, do not do it.
- If you are unsure, ask.
- If you see misconduct, speak up.

Why Integrity Matters

When we act with integrity and we do not compromise on integrity – no matter the pressure, no matter the situation, we:

- Build **strong relationships** with clients and partners.
- Protect **our company, colleagues and reputation**.
- Ensure **long-term success** – for our business and communities.



Your Responsibility

Before acting, ask yourself:

- Is this legal and ethical?
- Would I be comfortable explaining this to colleagues or family?
- Would I feel okay if my decision was made public?

If unsure, **stop and ask for guidance**. Violations of these principles may result in disciplinary action ranging from an official warning to suspension or termination of the contract, depending on the nature and severity of the violation.

Speak Up

If you see something wrong, **speak up**.

Contact your manager, the Head of GRC (albert.weenink@redevco.com), the Shareholder Representative (shareholder.representative@redevco.com), or the local whistleblowing authority (see "[Speak Up Policy](#)" for further details).

2. Trust: Building Lasting Relationships with Integrity

“We strive to be a trusted partner and build lasting relationships to seek the best outcome for our clients.”

Trust shapes how we work, how we interact with our colleagues, partners, and clients, and how we protect our reputation. Trust is built through ethical behaviour, transparency, and accountability.

2.1 Zero Tolerance for Bribery & Corruption

We do not offer or accept bribes, kickbacks, or facilitation payments. If pressured to make an improper payment, report it immediately via the GRC reporting tool.

We follow all anti-bribery laws – with no exceptions. When confronted with a bribe, decline politely and report any questionable offer via the GRC reporting tool (see [“Anti Bribery, Gifts & Hospitality Policy”](#) for further details).

2.2 Gifts, Hospitality, & Entertainment

Gifts, hospitality, or entertainment that create – or appear to create – undue influence is prohibited. Giving or receiving gifts up to €100 and hospitality or entertainment up to €250 per person is allowed, provided it is reasonable, proportionate and culturally appropriate.

For anything exceeding these limits or if unsure, seek approval via the GRC reporting tool or consult the GRC team at grc@redevco.com (see [“Anti Bribery, Gifts & Hospitality Policy”](#) for details).

2.3 Avoiding Conflicts of Interest

We ensure transparency and integrity in all potential conflicts of interest, or the appearance of, involving Redevco, its shareholders, clients, or personal interests, including those of your relatives. If you suspect a conflict might arise or exists, disclose it immediately to GRC via the [reporting tool](#) (see [“Conflicts of Interest Policy”](#) for further details).

2.4 Anti-Money Laundering & Counter-Terrorist Financing

Money laundering is the process of disguising illegally obtained funds to make them appear legitimate. We apply a strict Anti-Money Laundering policy to ensure Redevco is not involved in this criminal activity.

To prevent money laundering:

- We verify who we work with (Know Your Customer).
- We watch for suspicious activity: Unusual transactions, reluctance to provide information, or requests for cash payments.

As an employee, please report any concerns immediately, even if unsure. If something looks suspicious, speak up – it protects you and Redevco (see [“Anti-Money Laundering Policy”](#) for further details).

2.5 Extortion

Extortion in any form is strictly prohibited. Employees must report any attempts of extortion to local management or to the GRC team (GRC@reddevco.com). If necessary, the authorities will be informed.

2.6 Personal Investments

Using inside information – non-public knowledge – for personal gain through private investments (e.g., shares, financial instruments, or real estate) is strictly prohibited for all employees, their spouses, and direct relatives. For the following personal investments by you or your spouse, approval is required via the [GRC reporting tool](#):

- Investments in real estate or real estate companies directly or indirectly related to assets under management of Redevco or its partners.
- Transactions originating directly or indirectly from a portfolio held by Redevco, or its partners.
- Taking an interest of 10% or more in any one company or enterprise of any nature.

If unsure, consult the GRC team via the reporting tool (see [“Insider Trading Policy”](#) for further details).

2.7 External Activities & Directorships

Redevco encourages employee involvement in charitable, professional, and business activities that benefit society and enhance their skills. Please consider:

- Activities during business hours need prior approval of local management.
- Senior management should use the GRC reporting tool to seek board approval.
- For external roles in real estate (e.g., advisor, director, partner) held by employees or their close family, notify the GRC team via the reporting tool to assess potential conflict of interests.

2.8 Use of Internet

Internet use during business hours should focus on work, with minimal personal browsing. Inappropriate or offensive content must not be accessed, sent, or received on business devices.

If a BIP violation is suspected, Redevco may monitor digital activity, including emails, for a limited time. Monitoring will be fair and careful, with employees usually informed in advance. In urgent cases, after consulting the Head of GRC, monitoring may begin without prior notice, and employees will be informed as soon as possible.

2.9 Business Property

Redevco's property, including mobile phones, tablets, and laptops, must be used primarily for business purposes and not for personal use (see local HR policies for further details).

2.10 Treating Confidential Information

We have a responsibility to treat confidential information with care. This means we:

- Adhere to all company policies on information security, such as using strong passwords and locking devices and files to prevent unauthorised access.
- Do not share sensitive information outside Redevco and discuss confidential matters only in secure environments.
- Limit information access to authorised personnel only, maintaining confidentiality at all levels of operation.

2.11 Complying with Data Protection Laws

We apply a strict Data Privacy Policy, in line with the EU and UK General Data Protection Regulation. This means we:

- Ensure we collect personal data only when necessary and for valid reasons.
- Store and process data securely and delete data in line with Data Protection Regulation.
- Report any suspected data breach immediately to IT and GRC.

When leaving Redevco, employees must remove their personal data from work devices. The IT department will delete any remaining data (see "[Data Privacy - Employees Policy](#)" for further details).

2.12 Storage of Personal Data on Redevco Devices

Personal data can be stored on Redevco devices, but it should be of a reasonable size. Personal data is subject to the [Data Privacy Policy](#) and [Information Security Policy](#) and its security measures.

Data stored on e.g., OneDrive and hard disk can be considered personal, but not private. Individuals with administrator privileges could access a personal OneDrive in case of emergency. Administrator privileges are subject to strict governance, monitoring and control, and are only used in the line of duty.

Key Takeaways:

- We do not tolerate bribery or corruption.
- We report gifts and hospitality above agreed thresholds.
- We do not use inside information for personal investments.
- If something feels suspicious, report it.
- We protect confidential data and comply with privacy laws.

3. Passion: Driving Innovation & Positive Impact

“We are driven by passion that unites us to excel, innovate, and positively impact people and the planet.”

Passion fuels everything we do. It drives us to think beyond business, embrace sustainability, advocate for diversity, and foster a culture of collaboration. Passion ensures that our work makes a real difference – for our people, our clients, our shareholders, and the communities we serve.

3.1 Sustainability & Social Responsibility

We are committed to integrate Environmental, Social, and Governance (ESG) principles into every decision, ensuring long-term value for our business and society. Therefore, we commit to:

- Developing and managing real estate with high environmental and energy efficiency standards.
- Minimising our carbon footprint through responsible resource use and green building practices.
- Reducing waste and promoting recycling in our operations.
- Investing in projects that create vibrant and inclusive urban spaces.

(see “[Environmental, Social & Governance Policy](#)” for further details).

3.2 Business Conduct

We respect local customs and conduct our business in compliance with applicable laws and regulations. Redevco adheres to the United Nations Global Compact, particularly with respect to human rights, labour, and the environment.

3.3 Charity

We support charitable organisations through the Redevco Foundation. Requests for support are transparent, evaluated and documented. Donations are only made to organisations that serve a legitimate public purpose and are themselves subject to high standards of transparency and accountability. For more details, read our Intranet page:

“[Redevco Foundation](#).”

3.4 Political Neutrality

We, as Redevco, maintain a policy of political neutrality and, accordingly, do not endorse or make contributions to candidates for public or private office, political parties, or other political interests.

3.5 Diversity, Inclusion & Equity

Diversity, Inclusion and Equity makes us stronger. A workplace that welcomes different perspectives fosters creativity, innovation, and smarter decision-making. Therefore, we:

- Value diverse backgrounds, ideas, and experiences.
- Apply equal opportunity practices in recruiting, hiring, developing, promoting, and compensating employees without discrimination based on race, colour, sex, religion, political opinion, nationality, class, age, disability, sexual orientation, or any other reason.
- Do not tolerate discrimination or bias in hiring, promotions, or day-to-day interactions, nor harassment, intimidation, or offensive behaviour of any kind.

(see the [Diversity Inclusion & Equity Policy](#) for more information).

3.6 Collaboration & Knowledge Sharing

Passion thrives when we share ideas, work together, and learn from one another. We encourage cross-functional collaboration, continuous learning, and open communication.

3.7 Fair Treatment

All employees must treat each other fairly, with care, consideration, and respect. Redevco strives to provide a safe work environment, and we do not tolerate intimidation or harassment in any form.

Key Takeaways:

- Sustainability is a core commitment – we integrate it into everything we do.
- Inclusion, diversity and equity drives innovation and success.
- Redevco remains politically neutral.
- Collaboration and knowledge-sharing make us stronger.
- A culture of learning and open communication fuels progress.

4. Performance: Delivering Excellence Through High Standards

“We deliver amazing results for our clients and stakeholders through continuous improvement, high standards, and efficiency in all operations.”

We hold ourselves to high operational, and business standards because it drives innovation, and strengthens our long-term success. Performance means acting with discipline, responsibility, and accountability. It ensures that we remain competitive, resilient, and always one step ahead.

4.1 Financial Discipline & Responsible Resource Management

Maintaining strong financial discipline and managing resources responsibly are crucial for our long-term success. We achieve this by:

- Accurate financial reporting – full compliance with accounting standards.
- Cost efficiency – preventing wasteful spending and ensuring responsible investments.
- Strict financial controls – preventing fraud and ensuring accountability.

4.2 Document Retention

We maintain up-to-date, accurate and complete records (i.e. contracts, deeds, financial information, etc.). All records (including those containing personal information) are to be created, stored, maintained, and destroyed in accordance with the law and regulatory requirements.

4.3 External Communications

All external communications should reflect our values and enhance our reputation. Marketing materials must adhere to our visual identity guidelines, available on the Marketing & Communications intranet site. Before presenting at seminars or conferences obtain approval from the Communications Department to ensure confidentiality. Refer media inquiries to the authorised spokesperson or Marketing & Communications Team. For questions on external communication, contact the Head of Marketing & Communications.

4.4 Dawn Raids

If authorities conduct a dawn raid, immediately contact the Legal Team. A Redevco employee must always accompany investigators, record all documents copied or requested, and keep a written log of the interaction. Never destroy any documentation.

4.5 Cybersecurity & Fraud Prevention

Cybersecurity and fraud prevention is everyone's responsibility. Stay vigilant, follow best practices, and report anything unusual. Therefore we:

- Follow strict access controls to protect sensitive data.
- Conduct regular cybersecurity training for all employees.
- Report phishing attempts, security breaches, or suspicious activity immediately.

4.6 Health, Safety & Wellbeing

We are committed to providing a safe and healthy environment for all our employees, tenants, suppliers, and customers. We comply with applicable health and safety legislation and strive to exceed these standards to enhance the wellbeing and safety of everyone in our assets under management. We believe that a proactive approach to health, safety and welfare is essential for creating a positive and productive community for our colleagues, tenants, and partners (see the [Health & Safety Policy](#) for more information).

Incidents related to business integrity, compliance, health and safety, and operations must be reported via the [GRC reporting tool](#) or addressed to grc@redevco.com. Reported incidents are shared with the board and senior management for monitoring and follow-up.

4.7 Ethical Sourcing & Procurement Policies

Suppliers are selected based on quality, price and ethical alignment. All contracts and agreements must be fully documented and vendors that meet our ESG standards are preferred.

Suppliers and business partners are expected to meet our ethical and operational standards. This means:

- Complying with United Nations Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.
- Complying with Redevco's [Supplier Code of Conduct](#).
- Following anti-corruption, anti-bribery, and ESG requirements.
- Ensuring responsible labour practices and environmental impact management.

If a supplier or partner fails to meet our expectations, we may:

- Terminate contracts with non-compliant vendors.
- Report violations to regulatory authorities if required.
- Require corrective actions before continuing partnerships.

Key Takeaways:

- Operational excellence is a shared responsibility.
- Financial discipline ensures long-term success.
- Proactive risk management protects our business and people.
- Cybersecurity and fraud prevention require constant vigilance.
- We hold suppliers and partners accountable for ethical and responsible practices.

5. Commitment

5.1 Annual Compliance Declaration

All employees and contractors are expected to familiarise themselves with and acknowledge these principles annually to confirm their understanding and compliance.

The GRC team provides staff with a training about these principles annually. New employees sign the BIP as part of their onboarding process.

5.2 Speak Up

Redevco encourages you as an employee, a business partner, a stakeholder or in any other relationship towards Redevco to report any violations or concerns regarding:

- Ethical misconduct and breaches with these Principles or other Redevco policies.
- Suspected fraud, bribery, or corruption.
- Data security violations or regulatory non-compliance.

You can report concerns through:

- A line manager or team lead.
- The Head of GRC at albert.weenink@redevco.com.
- The local (anonymous) speak up channels.
- Local whistleblowing authorities.

Redevco will never retaliate against individuals who report concerns in good faith. For more details, see the [Speak Up Policy](#).