

## Code of Conduct

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### 1. Ina Invest Values

Our values form the basis of our corporate culture. All our employees must make them part of their life and actions:

- **Environmentally conscious:** We develop, implement and operate sustainable home, working and living environments. We meet the strictest ecological standards, especially when it comes to reducing environmental emissions, as evidenced by our claim to hold and constantly develop one of Switzerland's most sustainable real estate portfolios.
- **Transparent:** We communicate openly on a regular basis, justify our decisions and ensure that all the stakeholders are constantly well informed and aware of the relevant topics.
- **Excellent:** We are committed to maintaining a top-quality portfolio throughout the life cycle of our real estate. This excellence is reflected in our company's value creation and the resulting high performance for our shareholders.
- **Partnership:** We create win-win situations by living in a spirit of partnership, honestly and dependably. We treat our clients with respect and meet our obligations to all our stakeholders.
- **Visionary:** We think of ourselves as pioneers with the goal of setting the standard for developing, building and operating sustainable real estate. We create space for new ideas and innovations and focus on lasting solutions for present and future generations.

### 2. Integrity and lawful conduct

Integrity forms the basis of our actions. Ina Invest expects its employees to display strict compliance with the applicable laws and company policies in their work:

- We regularly inform our employees of the main changes or new laws and company rules and require their compliance.
- We encourage prompt reporting in case of violations of the applicable laws and rules.
- We ensure that our business assets and resources are used appropriately and solely for their intended purpose.

### 3. Prevention of corruption

Ina Invest is open to free-market competition and strives for success. Every successful offer must be made honestly and lawfully. For all of us, this means:

- We comply strictly with the prohibitions on bribery and corruption.
- Each employee is personally responsible for complying with the prohibitions on bribery and corruption and the associated group policies. This means that no employee may offer or accept any manner of gifts that must be presumed to be able to exercise an undue influence on business decisions.



- Employees must promptly report any conduct violating the prohibitions on corruption and bribery or other regulations, or any suspicions of such violations. Whistle-blowers do not face retaliation.
- Ina Invest fights against corruption and reports any unlawful conduct by its employees.
- Any sponsoring or subsidies to non-political organizations must be transparent.
- Ina Invest does not contract or do business with companies or individuals using corrupt methods.

#### **4. Free market and competition**

Ina Invest supports free and fair competition. Restrictions on free competition distort the market and hinder economic, social and democratic development, including the development of Ina Invest. We therefore apply the following principles:

- We comply with antitrust and fair competition law and refrain from collusion on prices, customers and territory.
- Every employee is personally responsible for complying with antitrust laws.
- Employees shall promptly report any antitrust violations or related suspicions. Whistle-blowers do not face retaliation.
- We take a responsible, performance-based approach to dealing with our tenants and other contractual and business partners on the market.

#### **5. Confidentiality and conflicts of interest**

We avoid situations which could lead to a conflict between our personal interests and the interests of Ina Invest:

- Secondary employment and shareholdings in business partners and competitors must be disclosed and approved in writing.
- Employees with access to confidential information that may have an influence on the prices of exchange-traded shares or other securities of Ina Invest are required to comply not only with the statutory prohibition but also with our company rules against insider trading.
- So long as information about Ina Invest is confidential, it must not be disclosed to third parties or the public.

#### **6. Data protection**

We comply with the statutory provisions on dealing with company data and personal data:

- Large quantities of data are collected in our company on both paper and electronic records, including information about suppliers and customers as well as personal data of past and present employees.
- Ina Invest, as a company, and all its employees treat such data with extreme care.
- If you have any doubts about the handling of data, please contact the company's data protection officer at [dataprotection@ina-invest.com](mailto:dataprotection@ina-invest.com).



## 7. Use of resources for information processing

Our IT infrastructure is used for the company. The proper functioning and security of the computer systems are crucial for smooth business operations. We therefore comply with the following principles:

- It is prohibited to do anything that might impair the operational safety and/or reliability of the Ina Invest IT infrastructure and/or could cause legal, financial or intellectual property damage to Ina Invest.
- The systems (including e-mails) must never be used in an offensive, disturbing or otherwise harmful manner. This includes the creation, display, storage or sending of pornographic images or messages or racist or unethical material.
- The necessary care must be taken when using the internet.
- The unlawful use of software may expose both individual employees and Ina Invest to prosecution.

## 8. Occupational health and safety

We are committed to the health and safety of our employees and of third parties, and

- We ensure a safe workplace and protect the health of our employees.
- It is prohibited to work in an impaired or intoxicated state under the influence of legal or illegal substances, including alcohol or prescription medications and drugs.

## 9. Social responsibility and terms of employment

We comply with the guidelines of the International Labour Organization (ILO) and offer our employees a motivating and secure working environment:

- We reject illegal employment practices.
- We protect our employees against physical dangers, sexual harassment and discrimination in the workplace.
- We prohibit child labour and forced labour and require our partners to adhere strictly to the same principle.
- We adhere to the principles of equal opportunity, do not tolerate unequal treatment or discrimination, and respect our employees' privacy.
- We are committed to fair and equal pay for our own employees and those of our partners.

## 10. Sustainability and the environment

Our commitment to sustainability is formulated in clear principles that are applied throughout our real estate value creation chain and guide our business model.

- We follow the strictest sustainability standards in our business sectors and encourage sustainable innovations.
- We actively contribute to achieving the UN Sustainable Development Goals and deal with climate change in our business strategy.



- We set ambitious sustainability objectives and anchor them in our business strategy and performance assessment.
- In each new project, we strive for a nationally or internationally recognized sustainability certificate (e.g. Minergie-P/A-ECO, SNBS, LEED, DGNBoder 2000-Watt-Areal).
- We require the use of renewable, non-toxic building materials and promote closed materials cycles.
- We evaluate the environmental, social and economic aspects of each project at an early stage and base our investment decision on that evaluation.
- We rely on transparent assessment and ongoing optimisation of our operational consumption levels thanks to digital solutions.
- We raise our stakeholders' awareness of sustainability issues and require them to make active contributions.

## 11. Human rights

We strictly recognise and comply with the United Nations Universal Declaration of Human Rights and the European Convention on Human Rights (ECHR) and take them into account in our supply chain.

- Ina Invest and its employees know about human rights and respect them.
- Whenever possible, Ina Invest examines its partners' business practices in the supply chain and fundamental human rights are taken into consideration in its relationships.

## 12. Requirements for the suppliers of Ina Invest

Ina Invest expects its suppliers and business partners to help actively implement the provisions of the Ina Invest Code of Conduct:

- We do not tolerate any illegal or prohibited behaviour on the part of our suppliers.
- Our suppliers also strictly adhere to the prohibition of corruption and bribery. This means, among other things, that suppliers must deal responsibly with gifts and neither offer nor accept any manner of gifts that must be presumed to be able to exercise an undue influence on business decisions.
- Our suppliers recognize that sustainable behaviour is one of Ina Invest's core values. We expect our suppliers to develop and apply an appropriate action plan concerning the environment, occupational safety, health protection, risk management and compliance.
- Ina Invest expects its suppliers to comply with the fundamental rights of employees and human rights under international conventions, programmes and standards, especially the prohibition of child labour and forced labour.
- We prefer subcontractors that are ISO 9001/14001/OHSAS 18001-certified or the equivalent over uncertified subcontractors.
- Our suppliers promote the provisions of the Code of Conduct among their own suppliers in a suitable manner (supply chain) and can provide proof of doing so on demand.



### **13. Adoption of further rules**

In addition to the principles of this Code of Conduct, the related Group Policies contain specific instructions on the behaviour required of employees.

### **14. Implementation of the Code of Conduct**

The rules of this Code of Conduct and of the (Group) Policies form an integral part of Ina Invest's corporate culture:

- Employees shall actively keep informed about the applicable laws and guidelines.
- The individual rules of conduct are binding: each employee assumes part of the responsibility. Violations shall be punished.
- The Code of Conduct shall be discussed at least once a year by the Board of Directors, which shall check for proper implementation and make any necessary adaptations of the Code of Conduct or organizational measures.
- The implementation of such rules is the responsibility of the Chief Executive Officer, who reports to the Board of Directors in that respect.