# Supplier Code of Conduct

logosproperty.com

### 1. Introduction

The LOGOS Group and its related bodies corporate (LOGOS) is committed to maintaining high standards of corporate citizenship and an important way that we will achieve this is by working with our suppliers to ensure high standards of environmental, social and governance performance across our supply chain.

In this Code of Conduct (Code), we have distilled our expectations of our suppliers, along with what you can expect from us, based on our values and the lessons we have learnt over time.

The standards set out in the Code are generally applicable and conducive of prudent and effective business management. We encourage all current and prospective LOGOS suppliers to adhere to the Code and this will be an important factor in our ongoing assessment of our relationship with you.

### 2. Scope

A "supplier" refers to any person or entity as determined by LOGOS, that provides products or services to LOGOS. They include:

- Vendors
- Suppliers
- Contractors
- Sub-contractors
- Consultants
- Partners

### 3. Laws and Regulations

Each supplier shall ensure that their businesses are conducted in accordance with all applicable laws and regulations of their country of operations, as well as those countries that are in the supply chain for the provision products and services to LOGOS. Where there are differences or conflicts between this Code and local laws and regulations, the higher standard should always prevail.

Such applicable laws and regulations include but not limited to the following areas:

- International Sanctions and anti-money laundering and terrorist financing;
- Prevention of bribery and corruption, fraud and collusion;
- Anti-trust and any other financial crimes
- Labour / employment / health and safety;
- Environmental sustainability;
- Privacy and confidentiality;
- Data protection and intellectual property protection;
- Cyber security; and
- Insurance and business continuity.

In addition, we expect our suppliers to conduct their businesses with high standards of corporate governance, ethical conduct and behaviour, including integrity, fairness, transparency, faithful and honest disclosure of information, and avoidance of conflict of interest.

### 4. Our commitment

#### 4.1. What We Stand For

Our values guide us every day, inspiring and uniting us across the regions in which we work and influencing our decisions and keeping us focused on what is important.



### 4.2. What You Can Expect from Us

LOGOS is a group built on the strength of its relationship with its suppliers. We respect the important contributions of our suppliers and we are proud to have built longstanding relationships with many of them.

In line with our values, our suppliers can expect us to:

- Treat them fairly and equitably;
- Operate in a way that promotes fair and open competition in the market;
- Seek to establish a sustainable supply chain; and
- Demonstrate our commitment to responsible sourcing.

### 5. Business Integrity

Our values inform our conduct and require our people to behave ethically. We expect that you will share this value too and will:

- Conduct your business in a manner which is fair, honest, respectful and lawful;
- Maintain high standard in business transparency and ethics.
- Adopt high standards of corporate governance, manage risks and compliance appropriately
- Ensure that LOGOS assets, property, information and position are used only for authorised and legitimate business purposes and are not misused for personal gain;
- Do not engage in, either directly or indirectly, fraudulent, corrupt or collusive activities;
- Do not engage in all forms of corruption including bribery, extortion, personal or improper advantage.

- Refrain from soliciting or offering of benefits, such as cash, gifts, hospitality, travel or entertainment, in order to obtain or maintain business.
- Avoid insider trading or procure other to trade while in the possession of material non-public or price sensitive information.
- Avoid all conflicts of interest or situations giving the appearance of a conflict of interest during the course of business.
- Maintain accurate and auditable records and accounts;
- Ensure business continuity to minimise the impact of unplanned events on the operations of your business and your employees and contractors

### 6. Anti-Money Laundering, Terrorist Financing and International Sanctions

LOGOS is committed to complying with Anti-Money Laundering laws (including laws on Countering the Financing of Terrorism and Proliferation Financing) and International Sanctions requirements of the countries that LOGOS operates in.

Suppliers must not engage in, either directly or indirectly, any money laundering activities, terrorist financing activities or proliferation financing activities. LOGOS is also committed to ensure that business is not conducted with any supplier that is listed in International Sanctions lists (including but not limited to the Sanctions Programs of the countries LOGOS operates in, the United States and United Nations Sanctions Programs) or has been embargoed by any international authority.

Any activity that contravenes the Anti-money Laundering laws or International Sanctions laws and regulations should be reported to LOGOS immediately.

### 7. Anti-Bribery & Corruption

LOGOS has zero tolerance for any form of bribery or corruption, fraud and collusion. Suppliers must comply with laws governing lobbying, gifts, and payment to public officials and other related regulations. LOGOS' Anti-Bribery and Corruption Policy can be viewed on LOGOS' website (www.logosproperty.com/corporate-governance).

Suppliers must not directly or indirectly or through third parties offer, promise, give or authorize the giving or pay anything of value to any officials of any government, government agents, political parties to obtain any kind of favour, improperly influence any act or decision that promote the business interests of LOGOS.

Suppliers should not make any facilitation payments on behalf of LOGOS.

Gifts and entertainment must not in breach of any local anti-bribery and corruption laws. Suppliers must be cognisant of any excessive offers or receipts of gifts/entertainment, benefits and hospitality that:

- could inappropriately influence, or be perceived to inappropriately influence, the outcome of business transactions with LOGOS; or
- can be perceived to obtain any unfair or inappropriate advantage; or
- is at risk of compromising Suppliers' integrity and objectivity or that of LOGOS

Any instances of excessive gift/entertainment offers or acceptance that contravene this Code are prohibited.

Any activity that contravenes the Anti-Bribery and Corruption Policy or relevant laws and regulations should be reported to LOGOS immediately.

### 8. Conflict of Interest

All business activities should be conducted with impartiality and any conflict of interests (personal or business-related conflicts), or the appearance of it, should be raised and managed. Suppliers should:

- Declare to LOGOS any situation that raises an actual, potential or perceived conflict of interest related to or in connection to any business dealing with LOGOS.
- Avoid financial, business or other relationships which may compromise the performance of their duties under their business arrangement with LOGOS.

### 9. Personal Data Protection and Confidentiality

Information supplied by you to LOGOS will be maintained in a confidential manner and will not be disclosed to any parties outside of LOGOS without the consent of the organisation that the information relates to, unless required by law.

Suppliers shall take appropriate steps to safeguard and maintain confidential, proprietary information of its business partners, or commercially sensitive information, and use such information only for the purposes authorized for use by the governing contractual agreement or, where there is not yet a contractual agreement in place, then by the understanding in place for the intended purpose. In case of sub-contracting, sharing of information with third parties should be made only with the consent of LOGOS.

LOGOS is committed to ensuring privacy in respect of personal data. Suppliers must apply adequate data privacy and security protection to protect the personal information of our customers from unauthorised access, use and disclosure.

Suppliers who collect, use, store or have access to our customers' personal information must have adequate processes and procedures in place to monitor compliance with applicable privacy laws and contractual privacy obligations.

LOGOS' Privacy Statement can be viewed on LOGOS' website (<u>www.logosproperty.com/corporate-governance</u>).

### **10. Health and Safety**

At LOGOS, people matter and we recognise that the health, safety and wellbeing of our people, external stakeholders, and communities in which we work, is essential to the success of our business. This includes tenants, contractors, customers and visitors.

As a LOGOS supplier, we expect you to:

- Provide a safe working environment and mitigate health, safety and wellbeing risks for your workers and anyone impacted by their work.
- Comply with all relevant health and safety legislation as a minimum.
- Have an effective health and safety management system which guides the business on how to work safely, to record and monitor risks and incidents.
- Provide ongoing health and safety training to ensure employees and visitors understand how to perform their work safely.
- Regularly monitoring the conditions of the workplace in order to identify hazards and prevent illness or injury arising from the operations of the workplace.
- Foster a culture of safety accountability and continuous improvement within your workplaces.
- Provide the necessary resources to promptly and effectively respond to incidents which may arise.

### 11. Human Rights, Modern Slavery and Workplace Relations

Our people are our greatest strength and we are committed to ensuring they have a workplace in which they are supported to achieve their potential. We respect and support human rights as set out in the Universal Declaration of Human Rights and our people are required to treat each other with dignity, respect and fairness. We expect that you, and your supply chains, will:

- conduct your business in alignment with the Universal Declaration of Human Rights;
- comply with applicable human rights and modern slavery laws in respect of your employees and contractors;
- provide fair working conditions for your employees, including restricting hours to be within legally accepted maximums and provide adequate rest breaks;
- pay your employees in compliance with applicable local laws, including those relating to minimum wages, overtime hours and legally mandated benefits;
- not used forced, bonded or involuntary labour;
- provide a workplace where all employees are treated with dignity and respect and free of harassment, discrimination and bullying on any basis prohibited by law, and to ensure this commitment extends to all aspects of workplace relations; and
- ensure no child, involuntary or trafficked labour is used and no other incidences of modern slavery occur and extend this requirement throughout all areas of your supply chain.

### 12. Environment and Sustainability

### 12.1. Environment

We recognise the importance of environmental responsibility and sustainability in the real estate industry. We are committed to reducing our environmental impact and promoting sustainable practices in all aspects of our operations. As our valued supplier, you are expected to share in this commitment to environmental sustainability. This commitment includes:

- demonstrate compliance with all relevant local and national laws and regulations relating to environmental performance, management and reporting as well as strive to comply with international environmental protection standards;
- have an effective environmental management system to measure, manage and minimise adverse environmental impacts; and

- seek opportunities to improve environmental performance across construction, operation and decommissioning of site assets.
- Actively manage the environmental impacts of their operations and take responsibility for minimising the negative impact of their products and services throughout their lifecycle
- Embed environmental management principles within business operations and processes
- Continuously seek ways to maximise the efficient use of energy, water, resources and raw materials and minimise waste and pollution especially greenhouse gas emission

Having transparency and providing information on their environment policies, goals, and performance upon request. In the event of any significant environmental incidents or non-compliance with environmental laws, suppliers are required to promptly inform us.

### 12.2. Land Management

We are committed to responsible land management practices that respect the environment and communities in which we operate. Our suppliers play a crucial role in upholding these principles. We expect suppliers to adhere to sustainable land management practices, including responsible land use, conservation, and development. This encompasses respecting land rights, avoiding deforestation, protecting natural habitats, and minimizing the environmental impact of any land-related activities. Suppliers must also comply with all applicable land use laws, regulations, and permits. In addition, we encourage suppliers to engage with local communities to ensure their land management practices are conducted in harmony with community needs and aspirations. Responsible land management is integral to our mission of promoting sustainability and responsible business practices in the real estate industry, and we appreciate the commitment of our suppliers in helping us achieve this goal.

### 12.3. Ethical Sourcing – Social Procurement

We are dedicated to upholding high ethical standards in our supply chain. We recognize the vital role of social responsibility in procurement and commit to ensuring that our supplier network aligns with these principles. We expect our suppliers to adhere to ethical sourcing practices, which includes respecting human rights, labour standards, and community well-being. Suppliers are required to maintain fair and equitable working conditions, provide safe environments for their employees, and avoid any form of forced or child labour. Additionally, we encourage suppliers to engage in community development initiatives that foster positive social impact. We believe that ethical sourcing is not only a moral obligation but also a key driver of long-term business success, and we appreciate the commitment of our suppliers in contributing to a just and responsible supply chain.

### 13. Cybersecurity

Cybersecurity is a joint responsibility of LOGOS and our trusted suppliers and partners. Where suppliers store or process LOGOS information, have trusted access to LOGOS systems or LOGOS depend on them to support critical business functions the below applies:

- Prior to the finalization of any supplier agreement, suppliers may be required to complete a risk assessment about the scope and application of their security program. Moreover, suppliers must be prepared to provide this information whenever requested during the term of your engagement with LOGOS where that information is relevant to the protection of LOGOS data or systems.
- Suppliers must maintain the security controls identified during the risk assessment conducted at the onboarding phase.
- Suppliers are required to provide evidence, primarily through independent testing and audit, that validates the efficacy and effectiveness of the security controls in place within their organisations.
- Access to LOGOS data and systems must be limited strictly to individuals who have a legitimate need.
- All breaches, or suspicions thereof, must be communicated to LOGOS without delay, ensuring no lapse exceeds 72 hours post-discovery.

In the event of a cybersecurity incident: Suppliers should notify LOGOS immediately of any violations of the Confidentiality, Integrity or Availability of data as per service agreements.

In the event of a security incident or if the supplier identifies critical vulnerabilities affecting LOGOS's environment that can't be mitigated within 72 hours, LOGOS should be notified.

If a security breach occurs due to the supplier's negligence or non-compliance with the agreement terms, the supplier is obligated to address and rectify the issue at their expense.

### 14. Your supply chain

To give proper effect to this Code, we ask that you:

- undertake appropriate due diligence checks of your sub-contractors and suppliers to ensure that they conduct their business in accordance with the standards set out in this Code;
- document all agreements with your sub-contractors and suppliers in writing, with such agreements being on reasonably competitive terms and in line with market practices;
- communicate our expectations set out in this Code to any sub-contractors and suppliers you use, in their local language and in a manner which they are able to understand;
- hold your sub-contractors and suppliers to the standards set out in this Code and work with them to ensure that their own supply chain meets the principles of this Code.

### 15. Reporting

### 15.1. Declarations, Incident and Breach Reporting

We ask that you tell us at the earliest opportunity if you that you become aware of any true or potential instances of non-compliance or ethical issues that may result in a breach of this Code. We will work with you to understand the issue and agree on appropriate remedial action, which we will expect you to implement.

You may report and escalate such a matter to your primary LOGOS contact or to **integrity@logosproperty.com**.

#### 15.2. Whistleblowing and LOGOS Speak-up Policy

You are encouraged to raise any questionable business practice, improper conduct, such as breach of law, breach of this Code, non-compliance matters, dangerous practice or unethical behaviour to your primary LOGOS contact. However, LOGOS recognizes that there may be times when this is not possible or appropriate.

In such instances, you may use LOGOS' confidential whistleblowing channel to escalate and report the matter. Reports can be made directly to **integrity@logosproperty.com**.

LOGOS' Speak Up Policy can be viewed on LOGOS' website (www.logosproperty.com/corporate-governance).

### 15.3. Questions on This Code of Conduct

This Code only serve as a general standard for ethics and conduct. It cannot be a substitute for personal integrity and good judgement and cannot spell out the appropriate response to every type of situation that may arise. We encourage Suppliers who are unsure about any interpretation of the Code or are unable to comply with the provisions of this Code to contact a member of the LOGOS team immediately.

### 16. Compliance

It is the responsibility of the Supplier to ensure that its employees, representatives, suppliers and subcontractors understand and comply with this Code and to inform their LOGOS Contact Person (or a member of LOGOS management) if the Supplier knows, or has reason to believe, that a violation by it or its employees or its representatives may have occurred or may occur in the future. Suppliers are expected to self-monitor their compliance with this Code.

### 16.1. Implementation

We will work closely with you to ensure that this Code is implemented, which may include:

- ongoing assessments by us of the practices of all suppliers;
- requesting your self-assessment of your operations against this Code; and
- periodic in-depth reviews, including provision of documentation and site visits.

Throughout this process we are trying to support process improvement and we ask that you participate fully, providing information in an honest and complete manner, supporting our on-site reviews and implementing any agreed remedial actions. Failure to comply or address non-compliance with this Code may result in contract termination.