



## THE CODE OF CONDUCT

### Responsibility starts with us

---

This Code of Conduct builds a framework for our daily business at Genesta. It is our guidebook for putting our values into practice. The Code of Conduct establishes basic principles and guidelines for all our interactions and communication with our stakeholders<sup>1</sup>. It covers topics relating to legal compliance and disclosure, human rights issues, HR practices, environmental matters, conflict of interest, anti-bribery and gifts, and reporting violation of this Code of Conduct. The Code of Conduct applies to all Genesta employees. The entire company and its personnel are committed to comply with the Code of Conduct's principles. In addition, we expect our stakeholders to comply with this Code of Conduct and its principles. The Code of Conduct has been approved by the board of directors.

<sup>1</sup>the word "stakeholders" as used in this Code of Conduct refers to our investors, shareholders, employees, contractors, tenants and other business partners.

## CEO'S MESSAGE

---

Sustainable business is crucial for achieving responsible financial results. Sustainability is integrated in all our actions and it is a basis for everything we do. Our success depends on the trust of our stakeholders on us and each of us has an important role in building this trust.

The Code of Conduct is the foundation of our company's policies and processes and it guides all our actions. It provides practical guidance on how we do business and helps us make right decisions every day.

The Code of Conduct is founded on our values and the ten principles of UN Global Compact concerning human rights, labor, environment, and anti-corruption. It describes what we stand for and our expectations on others. These values are proactive, passionate, respectful, and diversity.

At Genesta, we believe that our business can only thrive when it is built on transparency and founded on trust. We want to be a responsible partner and meet the high expectations of our stakeholders. That is why this the Code of Conduct is so important for us.

The Code the Conduct applies to all of us and each of us are responsible for understanding the Code of Conduct and act accordingly. We set an example with our own behavior and all our actions matter. Responsibility starts with each of us.



Yours sincerely,

**David C. Neil,**  
CEO, Genesta



**WE COMPLY WITH LAWS AND REGULATIONS**

We comply with laws and regulations that apply to our business in the countries where we operate. We do not commit or induce anyone to commit illegal activities. If we have any doubts about the compliance of our actions, we seek guidance and advice, before we act.



**WE DO BUSINESS FAIRLY AND RESPONSIBLY**

We do business responsibly. We treat our stakeholders fairly.



**WE RESPECT HUMAN AND LABOR RIGHTS**

We respect internationally recognized human and labor rights in all our operations. We honor the freedom of our employees and do not use forced or child labor. All our employees are free to join associations and have the right to form and join trade unions.



**WE TREAT EACH OTHER WITH RESPECT**

We believe that satisfied, enthusiastic and professional people are success factors for the company. We also believe that a diverse and engaging environment inspires people to reach their highest potential. To improve employee engagement, we take care of their well-being and we encourage active teamwork, continuous learning, and good partnership.

We are committed to offer a healthy and safe working environment for all our employees, the partners working in our premises and our tenants. We treat each other equally with the highest respect. We do not tolerate any kind of discrimination, harassment, or bullying. It is all our responsibility to create a good and inspiring work environment.



**WE PROTECT AND RESPECT PRIVACY AND CONFIDENTIALITY**

Genesta is committed to comply with the GDPR to protect the privacy of individuals whose personal data is processed by Genesta. Genesta is also committed to comply with its legal and contractual confidentiality duties.



**WE TAKE ENVIRONMENT INTO ACCOUNT IN OUR DECISIONS**

Sustainability is integrated into our business operations and is a part of the daily work of all our employees. Together with our partners we strive to reduce carbon footprint of our buildings and improve environmental performance. We also actively work with our tenants to help them reduce their environmental impact.



**WE MANAGE CONFLICTS OF INTEREST**

Genesta has arrangements in place to prevent potential conflicts of interests. We are managing conflicts of interest according to the applicable laws and regulations, and Genesta's Conflict of interest policy.



**WE DO NOT TOLERATE BRIBERY OR ANY FORM OF CORRUPTION**

We do not accept any kind of bribery or corruption. We do our best to prevent any suspicious activity that might be related to our business. We do not offer or accept gifts or favors if there is a risk that they might influence on business decisions.



**WE SPEAK UP**

Any violation of this Code of Conduct that is detected should be reported to the management team of Genesta or, where applicable, by using the reporting channels described in the complaints handling policy.