

APSYS

ETHICAL CHARTER

2023

WHO IS THIS CHARTER FOR?

The Ethical Charter is intended **for all Apsys Group employees**, regardless of their management level, place of work or the position they hold.

It complements other existing policies, internal rules and charters already implemented by the Group.

Each employee must **be aware** of this Charter, **undertake to respect** it in the context of their role and responsibilities and **comply with the laws and regulations** in force.

WHY THIS CHARTER?

The Charter sets out the rules and main principles of business ethics within the Group and helps each employee to understand the main issues and be able to answer any questions you may have in certain situations.

To avoid any risk, everyone should **ask themselves what attitude to adopt** when faced with sensitive or unusual situations. In case of doubt/questioning, the rule is to consult your **line manager** or the **ethics officer** to discuss it before taking action.

An **alert system** is in place and is specified in this document. It will help you deal with any alert concerning the provisions of this Charter, which is brought to their attention.

The Apsys Group is also keen to ensure that its partners, service providers and suppliers respect principles equivalent to those defined in this Charter.

This charter is available on the Group's website: www.apsysgroup.com
It is translated into English and Polish.

A WORD FROM THE CHAIRMAN

There are obvious things that we do naturally, instinctively. So naturally that we forget to mention them. Ethics is one of them, but it's an essential part of Apsys, for all of us who work on our projects day to day.

Since Apsys was founded, respect and responsibility have been at the heart of our actions. Our CSR strategy reflects these commitments and fosters a culture shared at every level and across all departments. These core values are of course expressed in the way we design, build and manage our assets.

With this Ethical Charter, we wanted to formalise the principles that guide our approach. It sets out the rules and principles of business ethics that govern our actions. It is also in line with the voluntary commitment made by Apsys to subscribe to the United Nations Global Compact.

Everyone's involvement in respecting Apsys' values and ethical principles is essential to helping us carry out our mission and to safeguarding our image and reputation. Every employee has a role to play here: regardless of their position and the country in which they work, each must act with integrity, respecting their clients, colleagues and partners.

It is these commitments that bring us together and allow us to design and manage exemplary projects that reflect our *raison d'être*: to "Enhance the city by developing unique places that make life more beautiful for everyone."

I know I can count on you to respect and share this Ethical Charter on a daily basis.

Maurice Bansay



EMPLOYEES

The Apsys Group places its employees at the heart of its business and strives to offer them a calm, safe and high-quality working environment. In particular, the Group ensures that its employees are well aware of and trained in business ethics, as well as the applicable laws and regulations.

BULLYING AND SEXUAL HARASSMENT

The workplace should foster respect and inclusion. The Apsys Group condemns all forms of harassment (moral and sexual) and supports working relationships free of any violence, threats, intimidation or any form of abuse.

Each employee, within the scope of their responsibilities, is also invited not to remain inactive or silent when harassment is reported.

SOCIAL DIALOGUE

The Apsys Group encourages and values proactive social dialogue. Each employee, in accordance with the laws and internal regulations in place, has the right to express their opinions and points of view and the right to join staff representative bodies.

Through the social and economic committee, in particular, each employee may participate in collectively expressing their interests, particularly in decisions relating to the company's management and economic and financial development.

HEALTH AND SAFETY AT WORK

Apsys Group is fully committed to quality of life at work: each employee must be able to work in a safe, pleasant environment that respects their health.

The company is committed to providing its employees with a safe and comfortable working environment and to promoting their well-being in the course of their work.

DIVERSITY

The Apsys Group is a responsible employer that condemns all forms of discrimination and promotes diversity within its teams. It ensures equal opportunities and equal treatment of employees.



CONFIDENTIALITY OF INFORMATION - DUTY OF LOYALTY

The Apsys Group is committed to respecting its employees', customers' and suppliers' confidential information.

Each employee has a duty of loyalty and is subject to an obligation of confidentiality towards their employer. They are responsible for the confidential information they receive or process, and should only use it in the context of their professional duties. In the event they should leave, no employee is allowed to keep internal documents.

USE OF IT AND COMMUNICATION TOOLS

The IT Charter establishes rules for using IT and communication tools. Each employee is collectively and individually responsible for the effective and appropriate use of IT and communication tools.

In the context of conversations or publications, particularly on social media, everyone must express themselves with reserve and restraint and must ensure that their communications are made in good faith.

RESPECT FOR PRIVACY AND PERSONAL DATA

The Apsys Group attaches particular importance to protecting the privacy of its employees. Within the scope of its business, it therefore commits to:

- raise awareness of the issues related to the processing of personal data and protection of privacy;
- limit the collection of data to information that is relevant and strictly necessary to achieve the desired objective;
- process personal data fairly, lawfully and transparently;
- take all necessary precautions to ensure the security and confidentiality of the data collected.

The Apsys Group also ensures that service providers to whom it may entrust the collection or use of personal data comply with these principles.

RELATIONS WITH CUSTOMERS, PARTNERS AND SUPPLIERS

The Apsys Group is committed to fighting against corruption and conflicts of interest and encourages fair business practices in its relationships with all of its stakeholders.

BUSINESS PRACTICES

The Apsys Group condemns any unfair or anti-competitive commercial practice and ensures that it implements fair and transparent practices throughout its business.

The company requires its employees and stakeholders to adopt good practices, including refraining from sharing strategic information with its competitors.

FIGHTING CORRUPTION AND INFLUENCE PEDDLING

The Apsys Group is committed to doing business with integrity. It condemns all corruption, influence peddling and fraudulent practices throughout its business.

To combat any risk of corruption and influence peddling, the Apsys Group forbids its employees

from receiving or granting undue advantages to a third party in order to obtain preferential treatment. The company invites any employee faced with questions concerning such practices to contact their line manager before taking any decision.

CONFLICTS OF INTEREST

The Apsys Group is committed to the principles of loyalty and impartiality. Each employee has an obligation to act in good faith and to avoid any action that may conflict with the Group's interests or that may harm its reputation. Therefore, each employee undertakes to alert their line manager in the event of a conflict of interest situation.

In particular, the Group ensures that there is constant communication with third parties.





THE ENVIRONMENT

The Apsys Group is committed to preserving the environment and takes action to reduce the environmental impact of its business.

As part of its CSR strategy, the Apsys Group works to protect the environment throughout its business. It ensures that all its employees are trained and made aware of these issues.

ALERT PROCEDURE

A specific alert system is available to employees and all stakeholders: alertethique@apsysgroup.com
All reports, made in a sincere and selfless manner, will be treated confidentially according to the process in place.

GOVERNANCE

An ethics committee is responsible for overseeing ethical issues. It meets at least twice a year. It is made up of the following functions:

- Managing Director Development and Operations
- Group Finance Director
- Deputy Managing Director Leasing & Innovation
- Corporate Legal Officer
- CSR Director

GLOSSARY

ACTIVE BRIBERY: the offer of any advantage to a person for performing or refraining from performing an act facilitated by their function or role, committed by the bribe-giver.

PASSIVE BRIBERY: the solicitation or acceptance of an advantage or advantages offered by a person in order to perform or refrain from performing an act in their function or role or facilitated by their function or role mission, committed by the bribe-taker.

INFLUENCE PEDDLING: refers to the fact that a person receives - or solicits - offers, promises, gifts, presents or benefits of any kind, with the aim of abusing their influence, real or supposed, over a third party to make a favourable decision. Influence peddling involves at least three parties:

the bribe-giver, who is often also the beneficiary (the one who provides advantages and gifts), the intermediary (the one who uses the credit they possess or that is granted to them because of their position), and the target person who holds the decision-making power (public authority or administration, etc.).

Like bribery, influence peddling can be active (when it results from the proposals of the beneficiary of the decision) or passive (when it results from the solicitations or agreement of the intermediary).

CONFLICT OF INTEREST: A conflict of interest is any situation in which there is interference between the function exercised within a company and a personal interest, so that this interference influences or appears to influence the loyal performance of the function on behalf of that company.

www.apsysgroup.com

APSYS TOGETHER,
ANOTHER CITY
IS POSSIBLE.