

## **CODE OF CONDUCT**

For the attention of Aedifica staff

The members of Aedifica staff shall comply with all Belgian legal provisions and with the regulations included in this code of conduct. These rules were adopted by the Aedifica Audit and Risk Committee at the meeting of 27 August 2010 and were amended based on the new regulations on 2 September 2016. The following code (rules and values that had not yet been laid down in writing) (the "Code") was drawn up in accordance with the existing Aedifica values and rules.

The regulations for Directors and actual leaders have been set out in the Corporate Governance Charter.

### **Conflicts of interest**

The Aedifica staff must avoid any action or transaction that could compromise Aedifica's interests.

Any member of staff faced with a conflict of interest shall immediately report this to the line management.

A conflict of interest is understood to mean a direct or indirect conflict with regard to the portfolio or of another nature.

### **Professional secrecy – Inside information**

During their professional activities on behalf of the company and after their termination, members of staff must not use or communicate any information that was not disclosed publicly in the annual and semi-annual reports or in various official announcements or any company information they have become aware of during their work.

In that context, they acknowledge that all economic, financial and real estate studies, customer and computer files, accounting data, contracts, business proposals, designs and plans of buildings and equipment, written and verbal work instructions related to the company's operations, procedures and economic and financial situation are confidential.

### **Purchase and sale of shares – Insider trading**

While working at Aedifica, you may become aware of "inside information" about Aedifica. Inside information is specific information about Aedifica that is not known to the general public and that a reasonable investor would consider important when deciding whether to buy, sell or hold Aedifica securities.

Buying or selling the securities on the basis of inside information (known as "insider trading") is a criminal offense and Aedifica employees are prohibited from trading on the basis of "inside" information in shares or other securities of Aedifica.

Revealing "inside information" to others, even to members of your family (known as "tipping") is also prohibited and may result in the criminal prosecution of anyone involved.

All employees of Aedifica should be familiar with Aedifica's "Dealing Code" (as last amended on 14 December 2021), which is attached to this Charter as Annex 4 and has been widely circulated within Aedifica.

### **Unauthorised use of company property**

Members of the staff shall not appropriate any objects (regardless of their nature and/or value) that are company property for personal purposes. This commitment also covers the unlawful use of Aedifica's communication and computer infrastructure for personal purposes.

### **Corruption and business gifts**

Staff members shall refrain from offering, giving, requesting, receiving or accepting any advantage, whether financial or non-financial, that is not in line with the Company's anti-bribery and corruption policy.

### **Human dignity**

Aedifica is committed to the highest standards of business and ethical behaviour and considers respect for human rights in the broadest sense fundamental in conducting its business. Aedifica expects its employees to uphold the same high human rights standards as Aedifica aspires in conducting its business, as set out in the Company's Human Rights policy.

### **Final provisions**

Aedifica ensures that all staff members are aware of the existence and content of this Code and the application of these provisions.

Aedifica pursues a business culture that is characterised by honesty and integrity, a sense of responsibility, strict ethics and compliance with the statutory rules and corporate governance standards that apply to it.

Aedifica therefore provides an internal procedure for reporting actual or potential infringements of the statutory rules, the Corporate Governance Charter and this Code when a reasonable suspicion of such an infringement exists ([Annex 3](#)).

Any violation of Belgian law, the Corporate Governance Charter and this Code shall lead to dismissal for cause if necessary, without prejudice to other legal remedies.

The Board of Directors is convinced that everyone will agree and comply with this Code. The aim of this Code is to create an ethical framework in which everyone can develop professionally.