



HUMAN RIGHTS POLICY

Valid from
1 July 2021

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Version 1.01

1. INTRODUCTION

1.1. PURPOSE

The public limited liability company “Aedifica”, a public regulated real estate company, incorporated under the laws of Belgium, including its subsidiaries (together hereinafter, the “**Company**” or “**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.

This Human Rights Policy (“**Policy**”) outlines Aedifica’s approach and commitment to respecting human rights across its operations. Aedifica is committed to implementing this Policy in the course of its existing business and in the assessment and development of new business opportunities.

1.2. OUR COMMITMENT

As a signatory to the United Nations Global Compact (“**UNGC**”), Aedifica is committed to business practices that respects human rights and that align with international standards of business conduct. Accordingly, Aedifica commits to the principles and guidance contained in the UN Guiding Principles on Business and Human Rights¹. In addition, Aedifica’s Policy commitments are further based on the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights², the International Covenant on Civil and Political Rights (“**ICCPR**”)³ and the International Covenant on Economic, Social and Cultural Rights (“**ICESCR**”)⁴), in addition to the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work⁵.

Where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights to the greatest extent possible.

1.3. SCOPE AND APPLICABILITY

This Policy applies to all directors, members of the executive committee and employees of Aedifica (including third party representatives) (“**Aedifica staff**”). Additionally, Aedifica expects its customers, suppliers, external service providers, intermediaries, or other persons or entities associated with Aedifica (“**Business Partners**”) to apply the same strict rules as stated in this policy.

The Policy is effective as of 1 July 2021.

¹ https://www.ohchr.org/documents/publications/guidingprinciplesbusinessshr_en.pdf.

² <https://www.un.org/sites/un2.un.org/files/udhr.pdf>

³ <https://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx>

⁴ <https://www.ohchr.org/en/professionalinterest/pages/cescr.aspx>

⁵ <https://www.ilo.org/declaration/lang--en/index.htm>

2. HUMAN RIGHTS PRINCIPLES

While human rights are by definition universal and equally important, Aedifica aims in particular to focus on these areas that are most relevant when conducting its activities and for which it has possibilities to make a difference and create added values through its actions.

We seek to carry out our responsibility to respect these human rights in our activities as an employer, care home provider, business partner and player in the community, through the specific commitments and measures described below.

A. Respecting human rights of the employees as employer

▪ Discrimination and Harassment

We value and advance the diversity and inclusion of the people with whom we work. We are committed to equal opportunity and are intolerant of discrimination and harassment. We work to maintain workplaces that are free from all forms of discrimination based on, but not limited to, race, religion, culture, gender, age, political opinion, national origin or extraction, social origin, pregnancy and maternity, sexual orientation, gender identity or expression, or any other arbitrary means. Hiring and employment decisions, including those related to compensation, benefits, promotion, training, discipline, and termination, are made solely on the basis of the skill, ability, and performance of employees.

Aedifica prohibits all forms of physical, verbal, and written harassment, and will not engage in corporal punishment or take disciplinary-related deductions from employees' pay.

▪ Working Hours and Compensation / Adequate Standard of Living

We compensate employees competitively relative to the industry and local labour market, and in accordance with terms of applicable collective bargaining agreements and respect the need for employees to have a balance between work and leisure. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

▪ Freedom of Association and Collective Bargaining

Aedifica respects the right of all its employees to form and join lawful trade unions and other organizations of their choice, and to bargain collectively in support of their mutual interests. Aedifica does not discriminate in any way against employees that choose to form or join trade unions, or against those employees that choose not to form or join trade unions.

▪ Workplace Health and Safety

Aedifica considers employee's occupational health and safety as a priority throughout all aspects of its activities. Aedifica is committed to comply with all applicable health and safety laws, regulations and standards and provides a safe and healthy workplace to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work.

▪ Forced Labour

Aedifica prohibits all forms of forced or compulsory labour and thus all employment relationships must be voluntary in nature. Employees are free to withdraw from the employment relationship with reasonable notice.

- **Child labour**

Aedifica does not use child labour in any of its operations or facilities and fully respects all applicable laws establishing a minimum age for employment, in order to support the effective abolition of child labour worldwide.

- **Employee well-being**

Aedifica appreciates the individual and collective value that employees bring to the Company. Aedifica aims to promote the personal development of its employees by offering them a motivating, comfortable working environment adapted to their needs.

B. Respecting human rights as provider of health care real estate

Health care real estate is at the heart of the Company's activities. Given this focus, Aedifica encourages integrated healthcare solutions adapted to changing demographics and needs. Aedifica's motto 'housing with care', reflects its long-term responsibility towards its care operators and their residents to develop and provide innovative real estate concepts that are tailored to the needs of the residents and improve their quality of life.

C. Respecting human rights as a business partner

Aedifica recognises that it can have a greater positive impact on the community by also requiring its Business Partners to respect the same high human rights standards as Aedifica itself.

We seek to prevent or mitigate adverse human rights impacts at our Business Partners, and we strive to encourage and support our Business Partners to work for continuous improvement throughout their business activities.

D. Respecting human rights as a player in the community

- **Environment**

Aedifica recognizes the human rights significance of land, clean air and water use to local communities. The Company develops and implements environmental programs and local sustainability initiatives to meet its objectives of protection the planet. Aedifica has established a long-term vision towards 2025 to initiate investments towards an energy efficient, low-carbon and climate-proof portfolio.

- **Community engagement**

The Company attempts to have a positive impact on local communities and considers community engagement as an important value. The Company recognizes the need to take special consideration of those who are vulnerable and potentially at a greater risk of experiencing negative human rights impacts. As part of its community engagement programme which contains specific programmes, actions and guidelines to engage with its stakeholders structurally, several initiatives are taken, with a special focus on improving the conditions for the elderly to lead a dignified life.

3. PREVENTIVE MEASURES AND SAFEGUARDS

3.1. WHISTLEBLOWING

The Company's directors, members of the executive committee, employees and Business Partners have a reporting responsibility when they (i) are aware of potentially unethical activities, (ii) have a doubt about a certain incident or (iii) are uncertain about a situation which could be construed as a violation of this policy.

Our employees can report possible violations of human rights or potential violations of laws or internal regulations to their supervisors or to the Compliance Officer.

In addition, we have established an internal procedure available to the executive committee, the employees and external services through which possible compliance violations can be reported discrete and fully anonymous directly to the Compliance Officer.

All reported incidents are promptly investigated and processed.

3.2. TRAINING

All employees must familiarize themselves with this Policy. The Company shall ensure that all employees shall receive an adequate training.

3.3. CERTIFICATION OF COMPLIANCE

All directors, members of the executive committee and employees are required to confirm that they have read and understood this policy and that they comply with it.

3.4. REPORTING

We report annually on our handling of human rights in our sustainability report.

3.5. COMPLIANCE

Compliance with this Policy is verified through various methods, including but not limited to, as the case may be, external audits and self-monitoring of human rights compliance.

4. CONSEQUENCES OF NON-COMPLIANCE WITH THIS POLICY

Breaches of this policy will not be tolerated and may lead to disciplinary and other actions up to and including, for employees, termination of employment and for Business Partners, termination all commercial relationships with the Company.

5. REPORTING A CONCERN OF ISSUE

If you have any questions or concerns regarding this policy, you may contact the Compliance Officer:

- by e-mail at thomas.moerman@aedifica.eu
- by mail at Aedifica NV/SA, Belliardstraat/Rue Belliard 40 box 11, 1040 Brussels (Belgium)
- by phone at +32 2 626 07 70
