

Code of Ethics

“ We do business honestly, fairly and with respect to the individual and the wider public. We believe there is no proper way to do the wrong thing. ”

Dedicated to:

All employees, so they know what is expected of them and that each of us is responsible for presenting and respecting corporate culture and ethical behaviour.

Leadership, so they know that their decisions, how they behave as role models and how they communicate with team members should be in line with company values and principles.

New employees, so they know what kind of company they are joining and what is expected of them, as well as what they can rely on and what principles will accompany their working life.

Business partners and stakeholders, so they understand our commitments in conducting business, as we expect them to align with them when working with us and let us know if they notice any deviations from the hereby articulated principles in practice.

Our mindsets

We are passionate about what we create together

Above all, we are one team working on projects to be proud of. Our shared passion and dedication are a source that brings us together in our desire for excellence in everything we do. This gives us the energy to go the extra mile in both setting goals and delivering on them. Passion is a path to excellence, progress and learning.

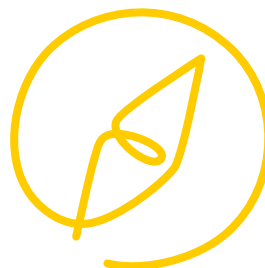


We build long-term business relationships

We invest in building long-term relationships based on mutual prosperity, trust, and respect, both internally and externally. For every situation we thoroughly assess contribution, risk taken, and benefits related. We understand the needs of clients, users, and investors, and become a trusted partner to them as a result.

We focus on people

We genuinely care about each other, whether you are an internal or external colleague working on our projects. We all have different backgrounds, speak different languages (and this is not just because we come from different countries) and yet we work together based on mutual respect and inclusion. We encourage straightforward and open communication whether we're celebrating or dealing with a difficult situation.



Creativity and innovation are part of our DNA

Our curiosity, 'can-do attitude', and passion for what we do is a driving force of our innovation. We encourage innovation that comes through breakthrough moments, as well as incremental improvements that come from daily challenges to the status quo. Continuous innovation contributes to our competitive advantage.

Our professionalism and personal integrity leads to excellence

We highly value personal integrity so our words, actions, and intentions are all aligned. We do our best to deliver on our commitments to all our stakeholders – starting from colleagues, to our clients, partners, investors, and shareholders. We value other people's time and are effective at communicating with them. We all behave in line with our Ethics program.



We are entrepreneurial which is reflected in the owner's mindset we honor and accountability we take

We strive to achieve the best business results possible, while protecting company resources. We are not afraid to consciously take calculated risks related to our actions. We are honest about the mistakes we make along the way and learn from them, so that we can do better next time. We recognise opportunities that others do not see and actively embrace them.

Our commitments



When conducting our business we comply with laws and regulations and commit ourselves to ethical standard, following the principles stated below.

Company towards employees

We create an environment in which people can realise their potential. We have an environment that helps them get the best out of themselves, from the perspective of professionalism and creativity but without compromising integrity. We create an employee experience that positively affects employees and their loved ones.

Innovation and creativity are in our DNA. The company expects employees to support these activities and become a part of them. In doing so, the company places great emphasis on protecting the rights and freedom of employees and persons concerned.

We act fairly towards employees and we respect their needs and rights with an emphasis on diversity and equality in the workplace.

We protect those who choose to report non-compliance with the laws, regulations or principles named in this Code.

Company towards the external environment

Community

We do business for profit, but with respect for communities. At the centre of our interest is the added value we create. We encourage active dialogue with the community and bring new solutions that have a positive impact on people's lives.

Environment

In the environmental field, we do not only meet the minimum requirements, we create projects with the least possible impact, as evidenced by our activities in accordance with BREEAM and WELL certifications.

Corruption

We reject corruption in any form. We do not accept or support similar practices by our employees, business partners or the institutions we are in contact with or personally.

We avoid situations that may represent a conflict of interest for us – both real and perceived.

Business partners

We prefer long-term relationships with our business partners. We responsibly fulfil our commitments to our partners. We choose who we work with and our partners must respect the values we follow.

Employee towards the company

I conduct my duties in compliance with law, regulation, internal policies and ethical standards.

I always look for ways to improve something, ways to make things more efficient and professional in accordance with our values. I stick to "walk the talk" and act in accordance with the firm's expectations, and if not sure about them, I seek for clear answers. I make an effort to fulfil corporate goals by fulfilling my business and developmental aspirations.

I don't put my personal benefit ahead of the benefit of the whole company and team. I make decisions with an emphasis on long-term success and if I have a dilemma, I ask questions loudly and do not try to run away from the situation. I ask for advice without compromising and then move my business forward with my actions.

I responsibly approach the property of the company as if it was my own. With this in mind, I use its resources and work with business partners and other stakeholders.

In case I see any non-compliance with the principles of this Code, I will not stay silent, but will point to it. In case of doubt or dilemma, I will ask for advice on how to proceed and use the available channels to report inconsistencies with principles in this conduct.



Speak up

We are committed to open culture and all employees and business partners are encouraged to report on non-compliance with principles outlined in this code via web Speak-up platform.

Employees can also use other channels outlined in the HB Reavis internal Speak-up policy.

HB Reavis is committed to protect employees submitting disclosures in good faith against retaliation. All matters reported via designated speak-up lines will be dealt with discretely, fairly, consistently and with undue delay.

[Enter our Speak-up portal](#)

