



Foreword from the CEO

Dear Suppliers,

As an integral part of our company's owner/operator strategy, we have worked hard to become a long-term partner for our clients—one that they can depend on and trust over many years. Fulfilment of this mission would be impossible without our Suppliers and other partners, who play an essential role in our activities. We have had great success developing strong working—and ethical—relationships with you, based on a shared set of values.

As CTP is now a publicly traded company, we believe it is important to codify our values, as they underpin our commitment to our Environmental, Social & Governance efforts. We expect our Suppliers to act with care and in line with our values through the provision of materials, products, or services. We invite you to join us on our journey to sustainability, as we need your full commitment and support to make it happen.

Attached you will find the CTP Group Suppliers' Code of Conduct, which serves as a minimum standard of conduct for all CTP Group Suppliers with respect to our Environmental, Social and Governance (ESG) principles.

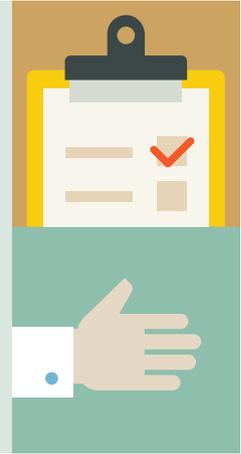
By reading the attached Code of Conduct and continuing in your capacity working with CTP, it is understood that you agree and accept our guidelines.

We thank you for your continued support and look forward to many long years working together.

Sincerely,

Remon L. Vos
CEO

CTP Group Suppliers' Code of Conduct



About Us

What we do?

The CTP Group is a full-service commercial real estate developer operating throughout the CEE region and beyond. We design, build, and manage sustainable business parks using high-tech solutions and state-of-the-art materials to achieve the smallest possible environmental footprint. All our activities are geared toward making positive contributions to the communities where we operate.

Our mission

Our mission is to provide sustainable building solutions with the smallest possible environmental impact. We believe that by committing to sustainability and protection of the environment, we work towards a better future not just for our customers and ourselves, but for all communities where we operate. By 2023 we aspire to become an industry leader in the transition to a carbon-neutral economy and reach the goal of net carbon neutrality.

Fulfilment of our mission would be impossible without our partners and suppliers, who play an essential role in our activities. We expect our suppliers to act with care and in line with our values through the provision of materials, products, or services. We invite them to join us on our journey to sustainability, as we need their full commitment and support to make it happen.

Our main values

At CTP, we value compliance and perform our activities in conformity with all applicable laws and regulations. We regularly monitor and adapt to the most recent industry standards and respect best practices in all countries of operation.

At CTP, we value ethical behaviour, both while doing business and at the workplace. We adhere to fairness, honesty and truthfulness in our relations with third parties and among ourselves. We support an objective business environment and denounce any form of bias.

At CTP, we value respect towards the natural environment. We support environmental awareness and participate in sustainability initiatives such as forest restoration. We promote the conscientious use of energy and sustainable sourcing of materials. All our buildings are carefully designed as complete ecosystems to ensure their sustainability and low environmental impact.

At CTP, we value socially responsible behaviour. We strive to be “a good neighbour” and engage in and support activities that help us to positively impact communities and society. We support a wide range of community-based organisations focused mainly on the provision of educational opportunities to underprivileged children or adolescents and other people in need.

Purpose & Scope

The CTP Group Supplier Code of Conduct is based on the CTP Group Code of Conduct as well as other Governance policies available on our website: <https://www.ctp.eu/>. The purpose of the CTP Group Supplier Code of Conduct is to define a minimum standard of conduct for all CTP Group Suppliers with respect to our Environmental, Social and Governance (ESG) values. This Group Supplier Code of Conduct does not aim to cover every possible situation the Supplier may face in cooperation with CTP, but rather provides guidance and principles reflecting our values in the areas of:

ENVIRONMENTAL

- : Respect towards the environment
- : Protection against pollution
- : Sustainable sourcing of materials



SOCIAL

- : Respect of human rights
- : No tolerance of forced and child labour
- : Inclusiveness
- : Freedom of association
- : Fair working conditions
- : Work safety
- : Health & wellbeing



GOVERNANCE

- : Anti-bribery and anti-corruption
- : Business hospitality and gifts
- : Prevention of money laundering
- : Avoidance of conflict of interest
- : Fair competition and market prices
- : Confidentiality and data protection



At CTP, we conduct our business lawfully and with integrity. We are committed to following and to be fully compliant with all applicable laws, regulations, and rules (including internal codes, guidelines, or best practice standards applicable to CTP) valid across all countries of operation. We value trustworthy business partners that conduct their activities in compliance with all applicable laws and regulations, industry standards and best practices. In case we become aware of any violation of laws, rules, or regulations, we act to address the problem and prevent any future occurrences.

As our Supplier you are required to be compliant and fully follow all applicable laws, regulations, and rules (including internal codes, guidelines, or best practice standards) related to or affecting your business operation. Your actions must meet our high ethical and legal standards. You are expected not to tolerate unethical behaviour in any form and to consult with CTP if such behaviour relates to interactions with CTP.

This document is also part of our continuous efforts to have all buildings constructed or maintained by CTP certified according to BREEAM standards.

As our supply chain plays an important role in achieving our goals, we invite you, our Supplier, to act, communicate and make your decisions in conformity with our values and expectations listed in this Supplier Code of Conduct.

Environmental



Respect towards the environment

At CTP, we care strongly about the environmental impact of our activities. We build highly efficient buildings designed as whole ecosystems to secure their long-term durability and low environmental impact. We also participate in various initiatives that help to secure sustainability and preserve nature's biodiversity.

As our Supplier, you are required to carry out your business in a sustainable manner and take into consideration the impact it has on the environment. You should secure awareness of employees of environmental issues and ways to prevent negative impacts. You are also encouraged to engage in sustainability initiatives that help to preserve the environment and communities that are part of it.

Protection against pollution

At CTP, we take great effort to reduce any negative impact that the production, storage and disposal of materials have on the environment. We adhere to rules and protocols of proper handling and storage of materials and continuously seek new and safe solutions to prevent pollution and maximise sustainability.

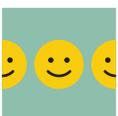
As our Supplier, you are expected to follow all applicable rules on the manipulation, storage and disposal of materials depending on their nature. You are also expected to apply pre-emptive measures against all types of environmental pollution so that the incidence of pollution is reduced to a minimum.

Sustainable sourcing of materials *(be mindful of environmental impact)*

At CTP, we care about natural resources and strive to protect them through various solutions and initiatives. We participate in the circular economy, through which we minimise waste and resource consumption with the reduction and reuse of raw materials and the recycling of products. Our vision is highly efficient circular parks powered by renewable energy with zero-waste and eco-friendly solutions that help attain sustainability and protect the environment.

As our Supplier, you shall gather, use, and consume natural resources conscientiously with regard to the environment. You are expected to adopt basic elements of the circular economy, such as waste recycling, and are encouraged to apply eco-friendly solutions where possible. You are also encouraged to optimise energy consumption in the workplace and to support the usage of renewable energy.

Social



HUMAN RIGHTS & LABOUR CONDITIONS

Respect of human rights

At CTP, we respect the rights of individuals and communities and provide support in exercising them. We are a community-oriented company and the wellbeing of people both outside and inside our company is very important to us. We promote social affinity and respect towards human rights by engaging in support of various social initiatives focused mainly on children and adolescents in need.

As our Supplier, you are required to treat people with dignity and to abide by the general principles of human rights according to universal declarations and guidelines proposed by the relevant authorities. You are especially encouraged to protect the rights of groups and individuals particularly vulnerable to human rights abuse, e.g., women, children, migrant workers, or disabled people.

Forced and child labour

At CTP, we strongly stand against any form of illegal employment, including but not limited to compulsory, forced and child labour, modern slavery, or human trafficking. We distance ourselves from all illegal practices against our employees that may cause a breach of their human rights and rights arising from labour law.

As our Supplier, you are expected to have zero tolerance towards all illegal forms of employment, including related unlawful practices such as the withholding of wages or restriction of an employee's movement by confiscating identification documents. You are also encouraged to raise awareness on this matter and to engage in activities that will contribute to the prevention of such actions from occurring.

Inclusiveness

At CTP, we consider people as one of our most important assets. We believe that all people deserve to be treated equally with respect and should be included and welcomed by society. We support diversity and disregard any form of discrimination based on age, sex, marital status, race, ethnicity, religion, sexual orientation, disability, or political preferences.

As our Supplier, you are expected to promote diversity in the workplace and condemn any form of discrimination. You should hire and give promotion to both staff and executives based on their performance, professional experience, or work results. You are also expected to condemn and apply measures against any form of harassment or abuse in the workplace, so that your employees feel safe and included.

Freedom of association

At CTP, we encourage our employees to create social groups in order to speak freely and share ideas and concerns to company management. We strive to create a safe and comfortable environment, where all employees can communicate without fear of judgement and discrimination.

As our Supplier, you are encouraged to support associations for the constructive discussion of ideas and concerns regarding work conditions and other work-related topics. You are also encouraged to recognise those suggestions and concerns in order to support the motivation of employees and boost work engagement.

Fair working conditions *(appropriate wage, benefits, vacation)*

At CTP, we follow all applicable rules and regulations valid across all countries of operation on working hours (including overtime), resting hours, vacation, sick leave, parental leave, or any other applicable leave.

As our Supplier, you are expected to provide your workers with a fair wage according to their job position and professional qualification, including benefits according to an employment contract and wage agreement, that comply with at least the minimum determined by applicable laws and regulations. You are also required to respect their right to rest, take vacation, sick leave, or parental leave, as determined by law.

HEALTH, WELLBEING, & WORK SAFETY

Work safety

At CTP, we take the work safety of our employees very seriously. We ensure that all staff are properly qualified and regularly re-trained for their job position. We also secure that machinery maintenance and safety controls of materials used are duly performed, including regular maintenance of office equipment. We also make sure that workers on the construction site have proper protective gear and that safety protocols, including an emergency plan, are in place and followed.

As our Supplier, you are required to take care of your employee's safety in all types of workplaces. You are to make sure the maintenance of all electrical equipment and machinery is regularly performed and that all staff are properly qualified and authorised to use such equipment or machinery. You are expected to have an emergency plan in place and follow applicable safety protocols.

Health & wellbeing

At CTP, we care about our employees by providing them with a safe and healthy working environment both on the construction site and in our office premises. We make sure that hygienic standards are met and that all employees' primary needs are satisfied. We also encourage our workers to keep a good work-rest balance to boost and maintain workforce productivity.

As our Supplier, you are expected to ensure the comfort of your employees at their workstations by creating and maintaining a clean and healthy environment and by providing your workers with all necessities according to general hygienic standards and applicable legislation. You are also encouraged to secure that all workstation equipment are properly functioning and set to appropriate levels.

Governance



Anti-bribery and anti-corruption

At CTP, we do not tolerate any kind of bribery or corruption. We urge both our executives as well as our staff to not give or accept bribes. We urge them to avoid any kind of corruptive behaviour or from engaging in any similar activities that could negatively impact the company.

As our Supplier, you are required not to tolerate any kind of bribery or corruption. You are expected to actively prevent such behaviour from occurring. If such an incident occurs, you are expected to take appropriate actions to understand the root cause of the corruptive behaviour, ensure appropriate disciplinary actions and prevent future occurrence of the risk.

Adequate business hospitality and gifts

At CTP, we strive to keep our objectivity and impartiality while doing business. We make sure that all accepted business courtesies are modest enough to not interfere with our business decisions. We secure that invitations to any events are accepted only in case such participation would benefit CTP's business. We also make sure that all gifts and benefits, both given and received, are properly disclosed, and logged in a gifts register.

As our supplier, you are expected not to offer or accept any hospitality or gifts that would improperly influence your, CTP's, or other business partner's decisions. In case of suspicion of improper influence related to CTP, you are required to notify CTP of this matter.

Prevention of money laundering

At CTP, we comply with all applicable laws and regulations on anti-money laundering (AML) and countering the financing of terrorism (CFT). We encourage our executive and non-executive employees to refrain from any illegal, unfair, or unethical behaviour that could lead to money laundering and direct or indirect financing of terrorism.

As our Supplier, you are expected to refrain from any illegal, unfair, or unethical behaviour that could lead to money laundering and direct or indirect financing of terrorism. You are also expected to immediately inform CTP of any such incidents, in case such incidents are associated with CTP's business or in case they may have an adverse impact on CTP, our business or reputation.

Avoidance of conflict of interest

At CTP, we ensure that our employees act in the best interest of our company. We secure that all actions where a potential conflict of interest (COI) might arise are discussed with and approved in advance by the CTP Group AML & Compliance officer or by CTP's CEO. We make sure that employees with COI no longer engage in CTP activities in relation to the concerned party.

As our Supplier, you are required to avoid any situations that could potentially lead to a conflict of interest in relation to your cooperation with CTP (e.g., a conflict of interest may arise if your employees, or their family members, friends, or other close person's personal, financial, or other interests clash with the interest of your company, CTP, or other business partner). You are also expected to properly manage already existing COIs and to notify CTP without delay of any new conflicts of interest that your company or your employees have in relation to cooperation with CTP.

Fair competition and market prices

At CTP, we foster a healthy business environment and respect towards our competitors. We conduct all our business activities in a fair and honest way in order to maintain fair competition on all relevant markets. Our policy is to comply with all applicable competition laws and regulations. We have a zero-tolerance policy towards any behaviour that aims to distort, restrict, or impede free competition, regardless of the country of operation.

As our Supplier, you are expected to comply with the rules of fair market competition and to carry out your business in an honest and fair way. You are called to not tolerate any form of illegal or anti-competitive practices that restrict fair competition. You are also expected to follow all applicable laws and regulations on public procurement and tenders and to refrain from any unethical or illegal practices in this respect.

Confidentiality and data protection (business and personal data, GDPR)

At CTP, we work hard to protect all kinds of personal or business-related data to remain an honest and trustworthy business partner. We are committed to protect the personal data, trade secrets, know-how, intellectual property, and other confidential information shared to us by our customers, suppliers, and other business partners. We also strive to protect the information stored digitally by applying cybersecurity measures.

As our Supplier, you are required to comply with all applicable laws and regulations on data protection (e.g., GDPR), as well as contractual terms with CTP or other business partners. You are expected to handle all personal information and business-related data with care and to protect it from misuse. You shall protect this data not only during the time of cooperation, but also after this cooperation ends. You are also expected to safeguard your digitally stored data by applying sufficient cybersecurity mechanisms.

Applicability

The CTP Group Supplier Code of Conduct applies to all CTP Suppliers.

Suppliers are defined as below:

- All Suppliers providing goods and services to CTP based on CTP standard terms and conditions (both construction and non-construction).

Reporting a Concern

To raise any concerns related to a violation of this Supplier Code of Conduct, please use one of the following options:



e-mail address:
compliance@ctp.eu



Post mail or personal visit:

CTP Invest, spol. s r.o.
Group AML & Compliance Officer
Národní 135/14
110 00 Prague
Czech Republic



Hot line:
(+420) 607 287 287



External independent web application Faceup
<https://www.report.faceup.com/en>
(Password FACEUP)

Suppliers Check Process



CTP expects our Suppliers to act with care and in line with our values through the provision of materials, products, or services. We invite our partners to join us on our journey to sustainability, as we need their full commitment and support to make it happen.

Our suppliers/contractors are required to ensure that the contracted work is carried out in accordance with the applicable legislation, standards, occupational health and safety, fire protection and environmental legislation, the general terms and conditions of CTP or the framework contract, if concluded with the supplier (contractor), the Supplier's Code of Conduct adopted by CTP and the OHS plan in the case of constructions, if prepared.

As part of the Compliance Program CTP has established a Suppliers Check Process to demonstrably ensure our partners meet a minimum standard of conduct with respect to our Environmental, Social and Governance (ESG) principles. Every counterparty is subject to compliance check before any contract is signed, or order issued. The following indicators are monitored:

- Adverse media
- Sanctions lists
- Enforcement data
- Human rights
- PEP (political exposed persons)
- SOE data (state owned companies)
- Or any other negative information

The Compliance check is performed by Group AML & Compliance Officer, who verifies and evaluates the identified findings, determines the level of risk, and approves or rejects the counterparty.

Applicable conventions



1. OECD Guidelines for Multinational Enterprises (MNEs)
2. UN Guiding Principles on Business and Human Rights (UNGPs)
3. ILO Core Conventions
 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
 - Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol)
 - Abolition of Forced Labour Convention, 1957 (No. 105)
 - Minimum Age Convention, 1973 (No. 138)
 - Worst Forms of Child Labour Convention, 1999 (No. 182)
 - Equal Remuneration Convention, 1951 (No. 100)
 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
4. International Bill of Human Rights
 - Universal Declaration of Human Rights (1948)
 - International Covenant on Civil and Political Rights (1966)
 - International Covenant on Economic, Social and Cultural Rights (1966)