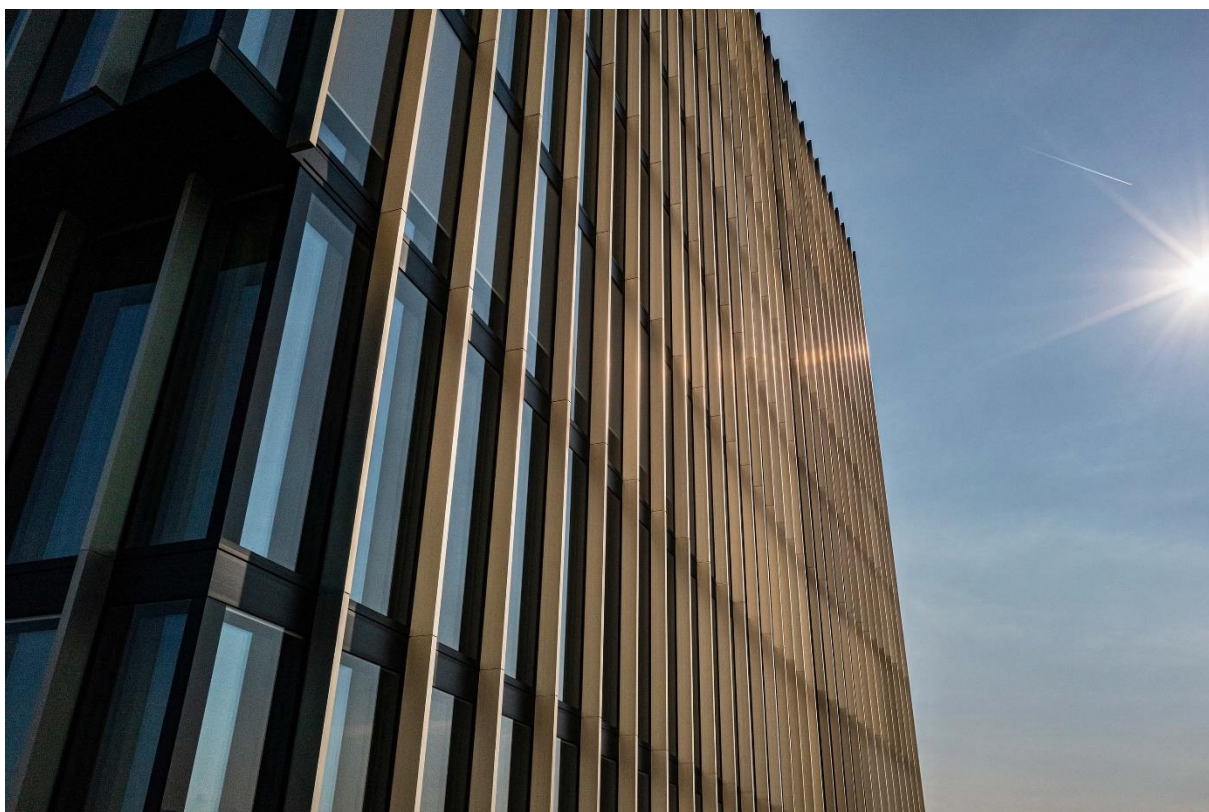


Policy statement regarding respect for and the observation of human rights

Zug Estates Holding AG



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1 Introduction

As a real estate company that conceives, develops, markets and manages properties in the Zug region, it is only natural that the Zug Estates Group respects basic, universally applicable human rights and supports the observation of those rights.

2 Commitment to human rights standards

We are committed to the principles of good corporate governance. Based on the Code of Conduct, the principles of responsible corporate governance are communicated to employees, with the ethically correct conduct of all employees taking top priority.

We are committed to strict compliance with all legal provisions that apply to our business activities and support the protection of human rights, take a stand against discrimination and promote equality. We expect our business partners and employees to actively promote responsible conduct and fair working conditions.

In this context, we align our actions toward the following conventions in particular:

- Universal Declaration of Human Rights of the United Nations
- Principles of the United Nations Global Compact
- Fundamental Principles and Rights at Work, including the eight core conventions of the International Labour Organization (ILO)

The basic principles and values of these conventions lay the foundation for responsible corporate governance. They are reflected in our guidelines (rules for doing business, etc.) as well as in our Code of Conduct and our Supplier Code of Conduct. Based on these guidelines and contracts, all employees and our business partners have pledged to conduct themselves fairly, respectfully and compliantly, both within the company and in dealings with all our stakeholder groups.

3 Inclusion of the value chain

Based on our business activities and the conventions specified above, we have identified the following action fields along our value chain with potential relevance in terms of respect for human rights. Our goal is to formulate suitable measures in these areas with potential human rights risks in order to counteract those risks and avoid them in the future.

3.1 Protection against discrimination, promotion of diversity

Zug Estates does not tolerate any discrimination against its employees. No individual may be favoured, disfavoured or harassed on the basis of characteristics such as their sex, skin colour, religion, nationality, political or other convictions, ethnic origin, disability, age, sexual orientation or identity. We take steps promote diversity and equal opportunities in all areas.

3.2 Prohibition of forced and child labour and the protection of minors

Zug Estates does not tolerate forced or child labour of any kind. Within the framework of the Fundamental principles of the International Labour Organization (ILO), we reject the use of both child labour and forced labour in all our business activities.

3.3 Right to health, occupational health and safety

Protecting employees' health and safety is a top priority at Zug Estates. The Group systematically complies with applicable labour protection laws. It also improves and promotes occupational health and safety on an ongoing basis.

3.4 Right to fair pay as well as fair, responsible treatment of employees

Zug Estates offers its employees competitive, performance-based remuneration. It promotes fair working conditions that enable employees to develop their potential, be innovative and perform to the best of their ability. It is careful to establish fair working hours and all applicable rules regarding working hours are observed.

3.5 Right to freedom and self-determination

The Group recognises employees' right to free choice of employer and to make their own career decisions. All employees are also granted the right to work in an environment where their dignity and rights are respected.

3.6 Right to privacy and protection of personal data

In order to protect the personal rights of its employees' and other stakeholders, Zug Estates respects their privacy through compliance with laws governing the use of personal data. Privacy protection and the security of corresponding data are also enshrined in our internal guidelines.

3.7 Freedom of thought, opinion and religion

All employees are entitled to freedom of thought, opinion and religion. They can speak about these topics freely as long as this does not result in other employees feeling discriminated against nor harassed.

3.8 Freedom of assembly and association as well as the right to collective bargaining

All employees are entitled to establish employee unions and to engage in collective bargaining as a means of regulating working conditions.

4 Responsibilities, trusting contact and further development

The Group management and executives of the Zug Estates Group guarantee compliance with applicable laws and provisions. Employees who feel discriminated against, sexually harassed or treated in any other way that is unacceptable and are unable to resolve the problem bilaterally have the option of contacting their direct line manager or chair of the Nomination and Compensation Committee of Zug Estates Holding AG. Alternatively, employees may contact the external ombudsman. Both employees and external staff may report any potential human rights violations or abuse to the ombudsman while keeping their identity confidential.

We expect all our employees to adhere strictly to the principles of this policy statement. The Group management and executives serve as role models in this respect and bear responsibility for implementation.

This policy statement regarding respect for and the observation of human rights is reviewed regularly by Group management and refined accordingly to reflect and incorporate human rights-related risk areas at the Zug Estates Groups and other relevant developments.

The Group management of the Zug Estates Group, June 2023

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