

Supplier Code of Conduct

Zug Estates Holding AG



31 May 2024

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1 Introduction

1.1 Purpose

The Zug Estates Group is a listed real estate corporation that operates in the Zug region; its business activities are geared toward this vision:

“We create added value through the creation, operation and continuous development of sustainable and diverse living environments.”

Zug Estates attaches great importance to sustainability in all aspects of its operations and embraces the principles of good corporate governance.

We are committed to strict compliance with all legal provisions that apply to our business activities. We are committed to protecting human rights, standing up against discrimination and promoting equality as well as to the sparing use of natural resources, the sustainable creation of properties and the emission-free operation of those properties.

We expect our business partners to embrace the same ethical principles, actively advocate responsible action and make a commitment toward fair, respectful, compliant conduct within the Group and toward all our stakeholder groups. To ensure this, Zug Estates drafted this Supplier Code of Conduct.

1.2 Scope

All suppliers of Zug Estates Holding AG and its subsidiaries (hereinafter referred to as the **“Zug Estates Group”**) must comply with this Code of Conduct. Within the meaning of this Code of Conduct, suppliers are deemed to be companies or persons who provide works, goods or services for the Zug Estates Group. Suppliers are also required to guarantee compliance on the part of their subcontractors.

2 Corporate Governance

2.1 Laws, Regulations and Ethical Standards

Suppliers are responsible for ensuring compliance in full with the applicable laws, guidelines, regulations and standards as well as with all collective agreements relevant to their business activities.

The suppliers shall support the UN Universal Declaration of Human Rights, the United Nations Global Compact and the 1998 International Labor Organization Declaration on Fundamental Principles and Rights at Work. Suppliers are specifically required to support ILO Conventions No. 138 and No. 182 on child labour together with the ILO-IOE Child Labour Guidance Tool and compliance with the UN Guiding Principles on Business and Human Rights.

2.2 Corruption

The suppliers shall comply with all applicable national and international anti-corruption laws and regulations. They shall take a stand against all types of bribery and refrain from doing anything that could fuel suspicions of corruptibility. Passive and active bribery in any form, in particular through the acceptance or granting of unlawful financial or other advantages, is prohibited.

2.3 Preventing Conflicts of Interest

The suppliers shall avoid situations in which their interests are, could potentially be or give the impression of being in conflict with those of the Zug Estates Group. The suppliers shall disclose promptly all actual or potential conflicts of interest related to the activities they engage in on behalf of the Zug Estates Group.

2.4 Data Protection

The suppliers shall comply with applicable data protection laws and regulations, including those related to the protection of personal data. This applies in particular to the protection of the personal data of customers, consumers, employees, shareholders and other suppliers. The suppliers shall observe all requirements specified when entering, recording, storing (including hosting), processing, transferring, using or deleting personal data.

The suppliers shall protect confidential information, use such information appropriately and exclusively for the intended purpose, and refrain from disclosing such information to third parties without the consent of the Zug Estates Group.

3 Social Aspects

3.1 Protection Against Discrimination and Promotion of Diversity

Suppliers shall not tolerate any discrimination against their employees, in particular with regard to recruitment, employment conditions, remuneration, access to training, promotion, termination, retirement and trade union membership. No one may be disadvantaged, favoured or harassed based on characteristics such as gender, skin colour, religion, nationality, political or other beliefs, ethnic or social origin, pregnancy, disability, age, health status, social status, marital status, sexual orientation and identity. Measures must be taken to promote diversity and equal opportunity in all areas.

3.2 Protection from Harassment and Abusive Behaviour

Suppliers must not tolerate any form of harassment or abusive behaviour at the workplace. This includes verbal, physical or sexual harassment. Clear guidelines and, if necessary, training sessions are required to educate and raise awareness among employees about these behaviours.

3.3 Prohibition of Forced and Child Labour and the Protection of Minors

Work must always be performed voluntarily. The suppliers shall ensure that no forced labour of any kind is used and that the work is not carried out under any threat or punishment. Employees must be permitted to retain control of their identity documents and any valuables in their possession (see ILO Convention no. 29 “Forced Labour Convention” and no. 105 “Abolition of Forced Labour Convention”).

The suppliers shall not tolerate any child labour. They shall not employ any children who are still younger than the minimum legal age of employment in the respective country or in the respective legal system. The suppliers shall define a minimum age of employment of 15 years, even if the employment of children younger than this would be permitted by law in accordance with local regulations (see ILO Convention no. 138 “Minimum Age Convention”).

3.4 Ban on Minerals and Metals from Conflict-Affected and High-Risk Areas

The Zug Estates Group attaches great importance to the quality and origin of its products. Zug Estates also expects its suppliers to ensure that the products supplied to Zug Estates do not contain any minerals or metals (especially tungsten, tin, tantalum and gold in unwrought forms) from conflict-affected or high-risk areas.

3.5 Right to Health, Occupational Health and Safety

The safety, security and health of employees shall be a top priority for suppliers. Applicable standards and labour protection laws are consistently adhered to. Mechanisms should be introduced in order to communicate and implement health and safety obligations to all parties under control. These include identifying and minimising hazards, providing safe equipment and training employees. Suppliers must also have systems and training courses in place to prepare for accidents and emergency situations and implement measures for recording and investigating any incidents, as well as notify Zug Estates of any such incidents if contractually obliged to do so.

3.6 Right to Fair Pay as well as Fair, Responsible Treatment of Employees

Suppliers shall offer their employees competitive, performance-based remuneration. They shall promote fair working conditions that enable employees to develop their potential, be innovative and perform to the best of their ability.

3.7 Working Hours and Form of Employment Contracts

Suppliers shall comply with all applicable national laws and binding industry standards concerning working hours, including with regard to overtime, breaks and paid holiday leave (in particular Federal Act on Employment in Business, Trade and Industry, Employment Act (EmpA) and Ordinance to the Employment Act (EmpO)).

Employment contracts must be given to employees in written form.

3.8 Right to Freedom and Self-Determination

They shall recognise employees’ right to free choice of employer and to make their own career decisions. All employees shall also be granted the right to work in an environment where their dignity and rights are respected.

3.9 Right to Privacy and Protection of Personal Data

In order to protect the personal rights of their employees' and other stakeholders, suppliers shall respect their privacy by complying with the laws governing the use of personal data.

3.10 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.

3.11 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 to regulate working conditions.

4 Environment

4.1 Zug Estates' Aspirations

With respect to its investments and in the operation of its portfolio, the Zug Estates Group pursues ambitious goals in terms of its future viability and plays a pioneering role, particularly when it comes to environmental sustainability. Zug Estates aspires to establish benchmarks through its extraordinary projects. In terms of environmental sustainability, we focus on the topics of energy and emissions, materials/circular economy, biodiversity and water.

The suppliers are aware of Zug Estates' aspirations and ambitious goals with respect to environmental sustainability and shall make an effort to help the Group reach those goals through the products and services they provide. Zug Estates is always open to ideas and suggestions from its suppliers on how to optimise tasks or processes with a view to promoting environmental sustainability.

4.2 Protecting Natural Resources

The suppliers shall comply with all applicable environmental laws, regulations and standards and operate an efficient system for identifying and eliminating potential environmental hazards.

The suppliers shall make an effort to protect natural resources and minimise the environmental impact of their activities by conserving materials and energy as well as by preventing and reducing waste and through recycling.

5 Compliance

The Zug Estates Group reserves the right to verify compliance with the requirements set forth in this Supplier Code of Conduct. To this end, Zug Estates or a third party commissioned by it is entitled to conduct spot checks of its suppliers in order to assess whether and how the Code of Conduct is being observed.

The conditions of this Supplier Code of Conduct reflect the values and obligations that Zug Estates has vis-à-vis its customers, society and environmental protection. As a result, every violation against these terms and conditions must be rectified. If violations are found, Zug Estates will contact the supplier to reach a mutual agreement as to how and by which deadline improvements will be implemented. If these are not implemented as agreed, Zug Estates may end the business relationship.

Violations against this Code of Conduct may also be reported anonymously to the ombudsman by the supplier and its employees. The corresponding contact details of the independent reporting office can be found on the Zug Estates website (<https://zugestates.ch/en/corporate-governance>).

6 Entry into Force

The Supplier Code of Conduct entered into force on 1 August 2023 and was updated on 14 May 2024.