

# Third Party Code of Conduct



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This Code sets out the minimum standards of integrity and business conduct Logicor expects of the Third Parties with which it does business. We expect our Third Parties to require the same level of compliance and integrity from their Staff and anyone outside their organisation engaged to provide services for, on behalf of or with Logicor.

No code of conduct can address every situation that Third Parties may encounter. This Code is therefore not a substitute for their own accountability and responsibility to exercise good judgment when it comes to proper business conduct.

We expect our Third Parties to have processes and controls in place, and to implement policies and training, as they see fit, to ensure compliance with this Code.

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## 1. Financial Integrity

### 1.1 Anti-Bribery and Corruption

Logicor has a zero-tolerance approach to bribery and corruption. Bribes can include money, gifts, hospitality, reciprocal favours, political or charitable contributions, facilitation payments made to secure or expedite a routine or necessary action to which the payer is entitled in any event, or any other direct or indirect benefit or payment.

Third Parties shall not offer, promise or give anything of value, directly or through another party, to anyone (including active or former government officials) with a view to (i) influence any person to do something that is dishonest, illegal or improper; or (ii) obtain or retain business or an advantage in the conduct of business for Logicor. Third Parties shall not solicit, request, agree to receive or accept anything of value as a reward for, or as an inducement to, acting improperly in relation to the awarding of business by Logicor.

We recognise that the polite conduct of business, especially in certain jurisdictions, may involve gifts and hospitality and can help foster positive business relationships. However, the nature, value, and frequency of any gift, hospitality, or entertainment received or given in connection with Logicor's business must always be reasonable.

Third Parties shall not provide any gift or hospitality where it might improperly influence anyone's decision in relation to any aspect of their business with Logicor or be construed as such. It is prohibited to accept or give any cash (or cash equivalent) gifts in connection with Logicor's business, regardless of value. Any gifts or favours to or from an active or former government official are subject to prior approval from Logicor's Chief Financial Officer.

### 1.2 Anti-Money Laundering and Terrorist Financing

Logicor does not tolerate financial or economic crimes such as money laundering, terrorist financing, or any form of fraud. Logicor defines money laundering as the process by which proceeds from illegal activities are disguised to appear to be from legitimate sources. This includes concealing, acquiring, using, or possessing such proceeds or facilitating their acquisition, use, retention, or control. Terrorist financing involves the raising, moving, storing, and/or using financial resources for the purposes of terrorism. Terrorist financing may occur through methods that are similar to money laundering but can be more difficult to identify. Fraud commonly involves the perpetrator making personal gains, or avoiding losses, through the deception of others.

Third Parties shall not channel any funds to support any illegal activities. Third Parties are prohibited from entering into any arrangement that facilitates or may constitute Logicor being involved, directly or through another party, in any such activities.

### 1.3 Insider Dealing

Logicor does not tolerate trading on, or any inappropriate disclosure of, inside information. Logicor defines *inside information* as information about an entity (e.g., strategic developments, financial forecasts, acquisitions and disposals, key personnel changes, valuation expectations, and any contentious matters) which is not yet publicly known.

Third Parties shall not engage in any inappropriate procurement or disclosure of Logicor's inside information, regardless of how that information was obtained. A Third Party in possession of any inside information about Logicor shall not buy or sell, or recommend that another person buys or sells, any securities of Logicor.

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#### Definitions

**Logicor Group** comprises Eurocor II S.à r.l. (incorporated in Luxembourg with registration number B215.464) and Eurocor III S.à r.l. (incorporated in Luxembourg with registration number B215.465) with registered offices at 14 Rue Edward, Steichen, L-2453 Luxembourg, and the respective direct and indirect subsidiaries of these two entities.

**Third Parties** are entities (including their Staff\*) or individuals who do business with Logicor, including (i) suppliers (and their supply chains), contractors, consultants, agents, brokers, representatives, joint venture partners and others performing work with, for or on behalf of Logicor; (ii) Logicor's customers/tenants; (iii) investors and shareholders of Logicor; (iv) buyers and sellers of assets; and (v) others that provide goods or services to Logicor.

\***Staff** refers to all persons working for a Third Party or on its' behalf, including the Third Party's employees, directors, officers, secondees, volunteers, interns, external consultants, or sub-contractors.

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## 2. Business and Personal Conduct

### 2.1 Confidentiality and Data Protection

Logicor respects and protects personal and other confidential or sensitive information belonging to Logicor or others.

Third Parties shall use all appropriate IT security and other methods to ensure that any such information is handled, processed and disclosed only as authorised by Logicor and at all times in compliance with all applicable laws and regulations. Any such information shall be protected against unauthorised or unlawful processing, disclosure, access, loss, alteration, damage, and destruction.

### 2.2 Competing Fairly

At Logicor, we are committed to fair competition. In driving the success of our business, we only seek competitive advantage through legal and ethical business practices.

Third Parties shall act in compliance with all competition and antitrust laws and regulations applicable to them. They shall refrain from entering into any formal or informal agreement which may have an effect of unlawfully restricting competition and shall not engage in price fixing of any sort or allocate markets, clients, or services when acting for or on behalf of Logicor.

### 2.3 Conflicts of Interest

At Logicor, we are committed to identifying and addressing any conflicts of interests that may arise in the course of any business relationship with a view to ensuring that we can act with objectivity in all our business dealings. A conflict of interests may occur when a private interest or activity interferes or may interfere with the interests of, or impact the work you do for, Logicor.

We expect Third Parties who become aware of an actual or potential conflict of interest that may impact what they do for, on behalf of or with Logicor to notify us as soon as possible with a view to finding a mutually acceptable resolution.



Truckföraren, Sweden



Mitry Compans, France

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## 3. Hiring and Employment Practices

### 3.1 Equal Opportunities and Respect for All

Logicor is committed to promoting a respectful working environment that is free from discrimination, harassment, intimidation, threats, violence, or any form of bullying.

We expect our Third Parties to provide working environments that are free from improper behaviour and where there is no tolerance for any disrespectful conduct. As part of their hiring and employment practices, Third Parties shall ensure that individuals are not discriminated against and that everyone receives equal treatment regardless of their race, gender, gender identity or expression, sexual orientation, religion, political or other beliefs, citizenship, national origin, ethnicity, colour, age, disability, marital or parental status, economic or class status or any other protected characteristic that is not related to the individual's merit or the requirements of a position they are seeking.

### 3.2 Wages and Hours of Work

Logicor is committed to complying with applicable laws and regulations relating to personnel's wages, working hours, and overtime.

Third Parties shall set working hours, wages, and overtime pay in compliance with applicable laws and regulations in the country or countries in which they operate. Third Party's Staff shall be paid at least the applicable legal minimum wage and shall carry out their operations in ways that limit any overtime to a level that promotes humane and productive working conditions. All work must be carried out by Staff voluntarily.

### 3.3 Health and Safety

Logicor is committed to providing a healthy and safe working environment and to actively promoting the welfare of all members of our staff.

Third Parties shall provide a healthy and safe working environment, investigate and minimise any health and safety incidents in the workplace, and provide sufficient personal protective equipment.

### 3.4 Modern Slavery and Human Trafficking

Logicor has a zero-tolerance approach to any form of modern slavery or human trafficking, including forced, bonded, or involuntary labour. Third Parties shall not engage in or tolerate any such form of labour in their business or supply chains.

### 3.5 Child Labour

Logicor is opposed to any form of child labour. We only support legitimate workplace apprenticeship and secondment programs developed for the educational benefit of younger people.

Third Parties shall only employ staff who meet the applicable minimum legal age requirement to work in the country or countries in which they operate and shall comply with all requirements pertaining to hours of work, wages, and safe working conditions for authorised young workers.

### 3.6 Freedom of Association

Our staff have the right to lawfully form and join organisations of their own choosing and peacefully associate.

We expect our Third Parties to allow their Staff to do the same.

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## 4. Environmental Stewardship

Logicor is committed to minimising the direct and indirect environmental impacts of its operations, to continuously improving its environmental performance and to act in ways that maximise the sustainability of resources across all areas of its business. Please visit our Corporate Responsibility page (<https://logicor.eu/en/eu/corporate-responsibility>) where you will find our 2020 ESG Report for more information about the sustainability policies and practices that we are committed to embed into our day-to-day operating activities.

We expect Third Parties to, *inter alia*:

- i. continuously assess and manage environmental impacts of their operations, including the sustainable use of natural resources, effective management of greenhouse gas emissions and waste, and limiting, to the extent possible, the impact of Third Parties' operations on the natural world;
- ii. inform us at the earliest opportunity of any significant environmental incidents and/or breaches at any Logicor-owned or managed assets; and
- iii. collaborate and cooperate with us with a view to achieving Logicor's and the Third Party's sustainability goals and objectives, including driving sustainability performance of Logicor's assets.

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## 5. Due Diligence

Logicor is committed to monitoring compliance against our internal policies and standards. Therefore, from time to time you may be required to demonstrate compliance with this Code.

When requested, we expect Third Parties to cooperate with us, provide complete and accurate information to facilitate Logicor's due diligence, including, *inter alia*, in relation to our sustainability data collection efforts.

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## 6. Speaking Up

At Logicor, we are committed to conducting our business with honesty and integrity and to working with Third Parties whose values are aligned with ours. Speaking up in good faith when you become aware of or suspect wrongdoing demonstrates integrity and courage to do the right thing.

Logicor expects Third Parties to report in good faith any concerns in connection with any aspect of Logicor's business, including any potential breach of this Code or any applicable laws, regulations, professional and ethical standards.

Provided the laws and regulations applicable to you permit it, you may raise your concern anonymously or on a named basis with your key contact at Logicor or with Logicor's General Counsel, Sheena Singla ([singla@logicor.eu](mailto:singla@logicor.eu); 0207 198 2427). In all instances, every effort will be made to ensure that reported information is kept confidential wherever possible and communicated on a need-to-know basis only.

We expect Third Parties to notify their Staff that they will not be subject to retaliation for reporting their concern in good faith.

