



WHITE STAR REAL ESTATE CODE OF CONDUCT

White Star Real Estate strives to be unsurpassed in adding value to our tenants, clients, and investors – by developing and operating real estate properties that are renowned for their enduring quality of design combined with outstanding customer service.

White Star Real Estate, further referred as “the Company”, has established this Code of Conduct for its employees to outline values, ethics and responsibilities towards the Company, our colleagues, our clients, and our investors. Following those principles, we want to demonstrate a culture of transparency, fairness, respect, and honesty in everything we do.

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Protecting the Company Assets

Employees should always act to protect the Company or clients' assets, including physical, intellectual, and electronic or digital properties.

The Company provides multiple communication tools to its employees to operate efficiently (notebooks, mobile phones, internet, and data access, etc.). These means must be used within the professional context for which they are intended, and in compliance with the law. Every member of staff is also asked to keep his/her workplace and its surroundings clean and orderly.

The Company manages our clients' properties with the same attention and care that we give to the assets that we own. It is this unique "owner's perspective" that is the foundation for our approach to managing properties. Most importantly is to care for the properties to ensure tenants are satisfied with their premises so they can focus on achieving superior results in their own businesses.

Providing Best-value Services and Maintenance

The Company knows there is an optimum balance between services provided and their economic cost. White Star focuses on controlling expenses without losing sight of quality and minimizing capital expenditures costs while maximizing their benefits.

Clear and Informative Communication

The Company trains its employees to understand that communication with clients must be concise, specific and provide an actionable recommendation for consideration. Communication with clients and tenants is always courteous and professional and is aimed at building cooperative relationships instead of simply enforcing policies.

Equal Treatment

The Company provides every employee fair treatment, career opportunities and conditions. The Company does not tolerate any form of direct or indirect discrimination based on race, sex, marital status, sexual orientation, age, family status, disability, religion, etc. Employees should treat their colleagues in a professional manner, with kindness and respect, in a way that they themselves should expect to be treated.

Dress Code

The professional approach and appearance of our offices and employees are demonstrated with appropriate business attire. A professional appearance is not only important when dealing with clients or customers but also on daily basis. Employees should be well groomed and dressed appropriately to project the image of trustworthiness and knowledge of the business, toward the clients who seek our guidance and professional services.



Working Hours

The Company creates suitable conditions for its staff to function during Company time. Employees must use their working hours wisely and effectively. Personal activities should be handled outside of the office hours.

Attendance, Punctuality and Absence

Scheduled working hours are influenced by and mirror our client needs. Employees are expected to be regular and punctual in attendance. This means being in the office and ready to work at an agreed starting time each day. Absenteeism and tardiness are not tolerated, as they burden other employees and the company.

Employees who are unable to work due to illness, accident, or another emergency must notify their supervisor. This allows the Company to arrange for coverage of their duties and helps others continue to work in their absence.

Substance Abuse

Substances affecting performance, the use of alcohol, narcotics and other addictive substances during working hours can lead to damage to life or health, injuries, and loss of reputation or financial harm. Employees are not allowed to work under the influence of such substances.

Safety

The Company has a responsibility to provide a safe and a healthy working environment for all employees. Employees are also responsible for taking all reasonable care to avoid endangering themselves and others at work. The co-operation of all staff is needed to achieve safety at work.

Every employee is empowered to take immediate action for safety regardless of role, title or responsibility. The workplace is to be kept injury-free and safe. Any situation that could put others at risk, must be reported and immediate action will be taken.

Conflicts of Interest

This is a situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity. Company employees must in all circumstances maintain their independence and avoid any conflict of interest, they must act professionally in the best interest of the Company. Employees may not carry out directly or indirectly, any personal transactions or activities that might thus result in a conflict of interest. If a conflict of interest potentially exists, the employee should disclose this to management of the Company for evaluation.



Improperly Accepting or Receiving Payments or Gifts

The Company prohibits its employees from accepting or receiving payment or other consideration from any other party in exchange for any business benefit. Gifts, travel or entertainment should not be accepted if they are intended to reward the receipt of business or otherwise affect your decision-making or create the impression that this is the purpose of the gift or entertainment.

Ethics, Fraud, and Anti-Corruption

The Company employees are expected to behave ethically and always act professionally in the best interest of the Company, with the objective of building a successful and sustainable business that is a valued member of the communities in which it operates.

The Company and all its subsidiaries and affiliates are committed to conducting its activities in accordance with best business practices, the local laws, and anti-corruption regulations. To guide our employees in upholding these objectives, the Company has prepared a Compliance & Anti-Corruption Policy ("Policy") and provides training for its Employees on this policy. All Employees are held responsible for knowing and complying with this Policy at all times.

Any misconduct, breach of rules, or violation of any policy must be reported in accordance with the whistleblowing policy.

Whistleblowing Policy

Anyone witnessing any kind of unethical behaviour misconduct, discrimination, fraud, bribery, or breach of policy, is encouraged to report such situation to the Company management of any level or to the Compliance officer.

Suspected or actual violations of the Compliance Policy should be promptly reported to the Chief Compliance officer by e-mail: compliance@whitestar-realestate.com or by calling +48 22 564 50 33.

Suspected violations of AML (money laundering) or MDR (tax disclosure) rules, should be reported to the Country Partner, the senior finance manager, and the senior legal officer (if one exists in the country).

All cases will be properly treated and handled with care. The identity of the employee and the Information provided will be treated with confidentiality and respect. These employees will be protected by management and do not have to fear any consequences of reporting such cases, and their identity will not be disclosed unless required by Law.

Employees will not be penalized for reporting cases made in goodwill even if they turn out to be untrue.



Confidentiality & Data Protection

Confidentiality - The Employee is obliged to maintain confidentiality about all activities and proprietary information learned in connection with the performance of work for the Employer, even after the termination of employment. The Employee further agrees not to disclose the terms and conditions of business transactions during or after cooperation with the Company.

Data protection - Employees are provided with confidential information from the Company. In furnishing such information the Company relies on employee agreement to preserve the confidential nature of all such information. All material which has been provided to, or received by employees, whether it is oral, written, or in another form, whether prepared by advisers or directly by the employee, is solely for the purposes and benefits of the Company. This information or material may not be used for other purposes than for the Company's activities. It is forbidden to disclose to any person the conditions and the facts with respect to this information or transactions during or after employment.

The Employee acknowledges that a breach of Confidentiality and Data protection obligations are a breach of their employment contract and considered a breach under the law relating to the work performed by the Employee. In event of such breach, the Company reserves the right to seek all allowed compensation and remedies available by law.

Press & Social Media

Statements and comments made to the press, media or posts on social media could violate our confidentiality obligations to our clients, investors, and tenants. Employees should not make statements or social media posts on behalf of the Company unless they have approval from the Company's senior management. If Employees are coming into contact with the press they should take care in what comments are made, and do so responsibly and act in the best interest of the Company.

Corporate Responsibility

The Company together with its employees support and participate in various charity programs and activities across all the regions aiming to help where needed. Our goal and mission are to support projects serving our communities to grow and develop, and to be a leader in social entrepreneurship, and to promote equal opportunity for disadvantaged children.