



21 March 2023, Lade Gaard
Chief ESG Officer, Reitan Eiendom

RESPONSIBLE EMPLOYER AND HUMAN RIGHTS POLICY FOR REITAN EIENDOM

1. Background and purpose

Reitan Eiendom (or the Company) has a fundamental respect for the value of human life, and wants to promote a culture characterised by respect and care. REITAN's eight values form the bedrock for the Company's activities. Reitan Eiendom wants to be a great place to work and will strive to develop talent, cooperation and diversity. The Company will conduct its business in a manner compatible with the UN's Guiding Principles on Business and Human Rights. Reitan Eiendom respects all internationally recognised human rights, including those codified in the UN's Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

Reitan Eiendom always takes into account the rights and interests of employees, clients, local communities and other stakeholders affected by the Company's activities. For Reitan Eiendom this also means to have focus on the Company's suppliers through the value chains. This is important in order to contribute to achieving REITAN's vision of being known as the most value-driven company.

This document describes Reitan Eiendom's guiding principles for how the Company treats employees, contracted personnel, suppliers, partners and local communities affected by the Company's activities. Reitan Eiendom will avoid having a negative impact on the human rights of others and will strive to ensure that instances where the Company's activities have a negative impact on human rights are handled correctly. This policy applies for all Reitan Eiendom's subsidiaries and corporate functions.

2. Freedom of religion and freedom of speech

REITAN value no. 6 is "We talk with each other, not about each other".

At Reitan Eiendom, we value open, fact-based, honest and respectful communication in our own organisation, as well as in dialogue with external stakeholders. Reitan Eiendom will strive to achieve a working environment where employees feel they can voice their opinion without fear of retaliation. All Reitan Eiendom companies will make it easy for their employees and external stakeholders to

address concerns and ensure that the stakeholders' grievances and input are handled in a respectful, fair and professional manner.

Reitan Eiendom respects freedom of religion, and will strive to provide a working environment where every employee feels included, regardless of religious faith or cultural background.

3. The right to life and security

Reitan Eiendom will do its utmost to ensure the health and safety of its employees, clients and others associated with the Company's activities. All Reitan Eiendom companies must be committed to the vision of zero harm to people and targeted efforts to create safe, healthy and attractive workplaces in line with the requirements described in Reitan Eiendom's HSE policy.

Reitan Eiendom will prevent behaviour or working conditions that may negatively affect the mental and physical health of the Company's employees and their families. Managers will be aware of their responsibility for the employees' health and safety and use their authority to promote a positive and healthy working environment. Reitan Eiendom has zero tolerance for any use of force, punishment or harassment against employees.

All Reitan Eiendom companies must be committed to ensuring safe products for their clients and users, in line with the requirements described in Reitan Eiendom's HSE policy.

4. The right to freedom and privacy

Work for a Reitan Eiendom company must always be based on a voluntary agreement. Reitan Eiendom companies must not have internal routines or conduct activities that prevent employees from leaving the company on their own accord. Reitan Eiendom shows respect for the privacy of employees, clients and other persons, and Reitan Eiendom companies must have restrictive practices as regards monitoring or intervening in employees' private lives. Personal data about employees or clients must always be collected and handled in accordance with statutory requirements, and data must be stored in a manner that prevents unauthorised access.

5. Skills development

REITAN value no. 4 is "We encourage a winning culture". Reitan Eiendom believes that employee development is important in order to achieve the Company's business goals, and also important for its image and reputation of being an attractive workplace. Reitan Eiendom wants its employees to grow and flourish so they can reach their full potential. Reitan Eiendom also wants the Company's employees to feel that their efforts are valued and put to meaningful use.

All Reitan Eiendom companies must establish formalised routines for employee evaluation and give employees the opportunity to develop their professional and personal skills over time, in line with the Company's skill needs for expertise. The Company's employees must receive regular feedback on the quality and execution of their work and have the opportunity to discuss relevant personal development activities.

6. Participation and employee involvement

Good internal communication and cooperation between management and employees is considered crucial for the Company's ability to succeed and for the employee's well-being. Reitan Eiendom companies must allow employees to be heard in decision processes that are relevant for themselves and the workplace, for example in relation to the working environment, health and safety. Reitan Eiendom employees must also have the opportunity to be informed about the Company's strategy and development, for example through the use of intranet and town hall meetings.

Reitan Eiendom respects freedom of association (and collective bargaining) and wants to promote respectful and constructive dialogue between management and trade unions. Freedom of association is a fundamental human right, which is also established in Article 8 of the UN's International Covenant on Economic, Social and Cultural Rights. For Reitan Eiendom, the right of the Company's employees to organise and freely join a trade union of their own choosing is fundamental.

7. Diversity and non-discrimination

Reitan Eiendom believes diversity is important in order to make good decisions, promote creativity and generally contribute to improvements in the enterprise. Reitan Eiendom companies must work systematically to promote diversity in the workplace and prevent discrimination based on gender, religion, race, national or ethnic origin, cultural background, caste, social group, functional disability, sexual orientation, gender identity, HIV status, marital status, pregnancy, maternity- or paternity leave in relation to childbirth or adoption, age or political opinion.

The companies must promote a culture where personal differences are respected and valued, and promote equal opportunity, particularly in connection with recruiting, compensation and benefits, promotion, working conditions, facilitation, training and development. This is why such great emphasis is placed on good cooperation with trade unions where employees may be members.

8. Fair working conditions

Reitan Eiendom wants to provide fair and good working conditions for the Company's employees. Reitan Eiendom companies must ensure that all employees, including part-time employees and temporary employees, have a written employment contract. Working hours must be in accordance with national legislation and relevant industry standards, depending on which provide the best protection, as well as negotiated agreements between the employees and the Company. The work must be organised in a way that makes it possible for employees to handle their assigned responsibilities within normal working hours, and reasonable measures must be implemented to prevent unhealthy workloads. The use of overtime must be in accordance with national legislation.

All Reitan Eiendom companies must have working conditions that make it possible for employees to combine their work and family life, including considerations for parental responsibility. Employees must be given at least one day off for every seven-day period. As a minimum, all full-time employees must receive salary and additional benefits that are sufficient to cover their basic need for food, clothing and shelter.

9. Respect for children's rights

Reitan Eiendom acknowledges the vulnerability of children and will do its utmost to protect children against physical, mental or moral harm. Reitan Eiendom will respect children's rights in the Company's activities and business relationships in line with UNICEF's Children's Rights and Business Principles.

No Reitan Eiendom company must employ persons younger than the normal age for completing compulsory education, or younger than age 15, whichever is higher. Young employees, defined as employees older than school age, but under age 18, must not perform hazardous work or work to an extent which negatively affects their ability to participate in education-related activities.

All Reitan Eiendom companies are subject to strict health and safety requirements in line with the Company's HSE policy. In the development of projects or products aimed at children (schools, parks, playgrounds, athletic facilities, etc.), Reitan Eiendom will exercise utmost caution to ensure that the Company does not expose children to any type of harm or unwanted influence. Marketing communication must conform with all applicable laws and regulations in the specific local country. If

the criteria defined in locally or regionally agreed guidelines are stricter, these should be used.

10. Protecting marginalised populations

All Reitan Eiendom companies must ensure that their activities do not interfere with indigenous peoples' right of self-determination, for example in connection with land areas or other natural resources which are essential for their way of life. If Reitan Eiendom or a subsidiary has business plans that may affect a marginalised population, the Company must establish a dialogue with representatives of the population group to find a solution that is satisfactory for both parties.

11. Implementation and follow-up

All Reitan Eiendom companies must take the necessary steps to comply with the principles described above.

In particular, Reitan Eiendom expects the companies to

- Communicate Reitan Eiendom's responsible employer and human rights policy to managers and trade union representatives.
- Regularly assess the risk of involvement in human rights violations and take reasonable steps to reduce identified risks.
- Integrate the principles in relevant internal procedures.
- Have a written procedure for how to handle potential grievances and concerns from employees and external stakeholders, or inform all employees about Reitan Eiendom's central whistle-blower system.

Reitan Eiendom will follow up compliance with the requirements through its sustainability reporting, and will also assess progress in the Reitan Eiendom companies' human rights activities.

12. The Company's suppliers and partners

Reitan Eiendom expects the Company's suppliers and partners to respect human rights and labour rights and to establish guidelines/policies for human rights that safeguard the company's responsibilities as described in the UN Guiding Principles for Business and Human Rights. If Reitan Eiendom discovers that suppliers or partners are involved in human rights violations, Reitan Eiendom will communicate its concerns and encourage the supplier or business partner to start a remediation process. If corrective measures are not implemented and the violations continue, Reitan Eiendom will reconsider that specific business relationship.

More detailed guidelines for handling human rights in the supplier chain are described in Reitan Eiendom's policy for responsible procurement, and Reitan Eiendom's Supplier Code of Conduct (SCoC).

13. Roles and responsibilities

The CEO is responsible for implementing Reitan Eiendom's responsible employer and human rights policy.

The senior executive of each of the subsidiaries has equivalent responsibility in their respective company.

The Chief ESG Officer of Reitan Eiendom is responsible for updating the policy and developing relevant supporting materials. This function can also assist the companies with training and awareness.

Reitan Eiendom's **responsible employer and human rights policy** does not confer clients, suppliers, competitors, shareholders or other persons or entities any legal rights beyond what follows from applicable statutory rules of law.

14. Approval and revision

This policy was adopted by the Board on 21 March 2023. The policy will be reviewed for potential revisions and adjustments every two years.