



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

HSE POLICY FOR REITAN EIENDOM

1. Background and purpose

The purpose of the HSE work (Health, Safety and the Environment) is to create a safe and healthy workplace for each individual for each individual employee, with a vision of zero harm. Reitan Eiendom (or the Company) takes a preventive and long-term perspective on HSE work as an integrated part of the Company's daily activities. Each individual manager is responsible for securing their organisation, expertise and work methods to prevent Injuries and illness. Reitan Eiendom's goal is to create safe and inspiring workplaces characterised by trust, professional and personal development, and a good working environment.

2. Scope

This policy applies for the entire Company and subsidiaries, both on construction sites and in our own offices. Legislation is the minimum requirement.

Managers and employees must work together to build a strong HSE culture. All employees, temporary employees and suppliers must be made aware of their responsibility to promote safety in the workplace.

The HSE system consists of these guidelines, as well as the HSE manual in the HRM system Simployer.

3. Responsibility

The CEO is responsible for the Company's HSE policy.

4. Goals and principles in the Company's HSE work

Paramount goal of the HSE work:

Reitan Eiendom must not cause harm to its own employees or third parties as a result of its activities (vision of zero harm).

The Company pursues goals and makes decisions based on the following general principles:

- Being familiar with and following all regulations that govern HSE issues in working life.
- Having managers that act in a responsible and health-promoting way to eliminate unsafe circumstances and activities.
- Adhering to the precautionary principle in risk assessments.
- Carrying out systematic HSE work in cooperation with the employees to eliminate and reduce HSE risks.
- Having proactive work methods that prevent injuries, and striving for continuous development and improvement.
- Carrying out active skills development to ensure that employees have the right expertise to lead and contribute to the HSE work internally and in supplier follow-up.
- Creating a good, inclusive working environment with meaningful tasks where the individual employee is supported by colleagues and managers.
- Ensuring good dialogue with clients, suppliers, authorities and other stakeholders to ensure good cooperation toward creating a healthy and safe working environment throughout the value chain.
- Ensuring that all construction sites have a dedicated plan for safety, health and working environment (SHA plan) (cf. the Builder Regulations) where the suppliers complement their HSE plan with relevant parts from the builder's SHA plan. This is an important measure to reduce the risk of injuries. The plan must be reviewed with involved personnel.
- Ensuring that all employees and contracted personnel receive good HSE training.
- Ensuring that Reitan Eiendom companies and partners actively use safe job analyses (SJAs).
- In addition to construction projects, ensuring focus on properties in operation with respective tenants. This is important in an HSE context. Individual tenants are responsible for their own HSE work, but as lessor, the Company is responsible for many of the technical prerequisites that are crucial for the tenant to succeed in this work. This particularly applies for organising fire protection efforts.

5. Partners

5.1. Requirements

The Company will establish SHA plans and SHA risk analyses for building and construction projects. The general contractor will build on this and prepare an HSE plan for the construction project, as well as a risk and vulnerability analysis (ROS). The general contractor must review these documents with all enterprises in the construction project. All suppliers must sign the HSE declaration to confirm that they work systematically on HSE and satisfy the requirements of the Internal Controls Regulations.

5.2. Follow-up

The SHA coordinator in the execution phase (KU) must participate in progress planning and other forums to ensure that sufficient time is allocated to complete the project in a safe and secure way.

5.3. Deviations

Deviations must be reported pursuant to the SHA plan.

6. 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.