



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

RESPONSIBLE PROCUREMENT POLICY FOR REITAN EIENDOM

1. Background and purpose

Reitan Eiendom (or the Company) is committed to using products, raw materials and services produced and delivered in a sustainable and responsible manner, with due consideration for human rights and the environment. This is why Reitan Eiendom works closely with its suppliers to ensure sustainability in the value chain. Despite the fact that the Company bears no legal responsibility for its suppliers' business standards, Reitan Eiendom expects suppliers to avoid contributing to violations of human and labour rights, environmental deterioration or breaches of anti-corruption legislation in the supplier chain. This in accordance with UN and OECD guidelines and principles.

The Company defines responsible procurement as carrying out procurement processes which prevent and limit (or eliminate) the risk of violations of human and labour rights, environmental legislation or anti-corruption legislation occurring in the supplier chains.

Reitan Eiendom believes that by following the responsible procurement policy, the Company will not only contribute to more sustainable supplier and value chains, but also reduce commercial risk and bolster long-term competitiveness. This is also crucial for achieving the goals in the Company's sustainability strategy.

2. Scope

This policy covers all procurement activities in the Company, including subsidiaries.

3. Responsibilities and commitments

The Chief ESG Officer is responsible for updating this policy.

The Company and each individual subsidiary are responsible for handling the procurement process in accordance with this document.

Reitan Eiendom commits to following all legislation that is relevant for the Company's activities, and to work actively to ensure that suppliers and sub-suppliers comply with legislation that is relevant for their activities in the market areas in which they operate.

4. Description

The Company's principles for responsible procurement

Responsible procurement involves conducting a risk assessment of all suppliers, and then interacting with suppliers whose identified risk is medium to significant. The Company works to continuously improve, both as regards setting internal goals and expecting progress from suppliers.

Ethical supplier requirements

The Company's Supplier Code of Conduct describes Reitan Eiendom's requirements for suppliers associated with their business practices, human rights, working conditions and the environment. The Company's Supplier Code of Conduct must be communicated to all suppliers, with particular focus on high-risk suppliers. Suppliers are encouraged to set the same types of requirements for their own suppliers, thereby having positive ripple effects throughout the value chain.

Risk assessment

The Company must conduct a risk assessment of all suppliers to identify those that may represent a risk of deficient compliance with the requirements presented in the Supplier Code of Conduct. The suppliers are categorised as low risk, medium risk or high risk. Suppliers categorised as medium or high risk must undergo a more detailed risk assessment. Examples of commonly used risk assessment tools include screening/supplier surveys/self-assessment questionnaires, as well as supplier audits.

Reactions to breaches

Responsible procurement allows the Company to use procurement in a strategic manner and thus have a positive impact on the suppliers' business standards. This means that, when breaches of the Supplier Code of Conduct are revealed, this does not necessarily mean that the agreement is automatically terminated. Based on the degree of severity of the breach, the Company will follow up the supplier through dialogue, guidance and requirements. If a supplier is unwilling or unable to implement corrective measures or the supplier has committed a material breach or repeated breaches of Reitan Eiendom's requirements, the contract will be terminated.

5. 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.

6. References

Reitan Eiendom's Sustainability Strategy

Supplier Code of Conduct