



21 March 2024, 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 people, society and the environment. This is why Reitan Eiendom works closely with its suppliers to ensure sustainability in the value chain.

While the Company does not bear legal responsibility for its suppliers' business standards, Reitan Eiendom expects its suppliers to organise themselves in a manner which ensures compliance with key international and national regulations, as well as avoids contributing to violations of human and labour rights, environmental deterioration or violations of anti-corruption legislation. This must take place pursuant to UN and OECD principles and guidelines.

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.

The purpose of this policy is to describe how Reitan Eiendom employees must work with procurement to ensure accountability as defined above. Reitan Eiendom believes that by following this 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 requirements incumbent on Reitan Eiendom

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 policy.

Reitan Eiendom is committed to compliance with all legislation relevant for the Company's activities. The Company is furthermore committed to active efforts to ensure that suppliers and sub-suppliers comply with the legislation relevant for their activities in the market areas where they are active.

This means that neither Reitan Eiendom nor employees of Reitan Eiendom will ever offer or accept unlawful or unjust monetary gifts or any other form of remuneration for securing business-related or private advantages or advantages for clients or suppliers. Reitan Eiendom and Reitan Eiendom's suppliers shall furthermore avoid partners that operate in countries subject to international sanctions by the UN, EU and/or Norwegian authorities.

4. Key elements in responsible procurement work

The (Norwegian) Transparency Act aims to promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services. The Transparency Act obligates Reitan Eiendom to conduct regular human rights due diligence of their value chains, suppliers and business partners.

Reitan Eiendom will make human rights due diligence a permanent item on its agenda. These types of assessments are an internationally recognised method used to map, prevent, limit and account for how enterprises handle potential negative impacts on people, society and the environment in their own activities and in the supplier chains. Reitan Eiendom also expects the Company's suppliers to apply human rights due diligence as a method in their work.

The following documents and activities constitute key elements in Reitan Eiendom's responsible procurement work:

- 1) **Risk assessment and reporting:** The Company must conduct a risk assessment of all suppliers to identify those that may represent a risk of deficient compliance with relevant national and international regulations, as well as the requirements presented in the Supplier Code of Conduct. The suppliers are categorised according to risk (low risk, medium risk or high risk, respectively). Suppliers that are considered to be medium or high risk must be subject to a more detailed risk assessment tailored to the specific risk profile. The Company must use risk assessment tools as part of this risk assessment, for example screening the supplier and its ownership structure, supplier surveys/questionnaires for self-assessment, as well as supplier audits. Reitan Eiendom publishes an annual report on its human rights due diligence, findings and follow-up measures in line with the Transparency Act.
- 2) **Reitan Eiendom's Supplier Code of Conduct:** 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.
- 3) **Follow-up and dialogue:** Responsible procurement allows the Company to use procurement in a strategic manner and thus have a positive impact on the suppliers' business standards. This is why the contract should not necessarily be terminated automatically when breaches of the Supplier Code of Conduct are uncovered. 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 cancelled (revoked or terminated).

5. Evaluation and improvement

As part of its work on human rights due diligence, Reitan Eiendom continuously evaluates and improves its guidelines and procurement practices in an effort to contribute to its suppliers' and sub-suppliers' compliance with the Supplier Code of Conduct (SCoC). Reitan Eiendom will inform the suppliers about such potential updates of or corrections to the SCoC, and will give its suppliers and business partners reasonable advance notice if new requirements should arise.

Reitan Eiendom believes that constructive and open dialogue is crucial. When needed, the Company is prepared to be a sparring partner in the suppliers' work on human rights due diligence and satisfying Reitan Eiendom's requirements.

6. Approval and revision

This policy was adopted by the Board on 21.03.2024. The policy will be reviewed for potential revisions and adjustments every two years.

7. References

Reitan Eiendom's Sustainability Strategy

Supplier Code of Conduct