INTEGRATED REAL ESTATE SERVICES

Code of Conduct

Integrated Real Estate Services (IRES)

is an integrated real estate service provider with national wide operations.

- IRES is committed to ensuring that the market works well for consumers and that all businesses engaged in real estate services are prevented from causing significant harm to consumer interests.
- This Code is designed to enhance the reputation of real estate service providers and protect consumers against misdescription and breach of confidence in this sector.
- This Code of Ethics & Business Conduct specifies and helps to implement the corporate principles providing certain standards of behavior in key spheres.
- We have the same expectations of our suppliers.

Code of Conduct

Code of Business: describes the main demands to our Partners to provide a successful cooperation

Code of Ethics: describes the main values inside the company

The mission of this Code is meant to provide a frame of reference against which to measure any activities, not to cover all possible situations that may occur.

Code of Ethics. How we work

- **Act legally**
  IRES and its employees should comply with the law. This compliance must never be compromised. Moreover, employees shall follow internal rules and regulations as they apply in a given situation. Being honest means to put the Company's interests ahead of personal or other interests.
- **Professionalism**
  Being responsible for the quality of services provided and desire to do our best to satisfy the needs of the Partners.
- **Reliability**
  We do care about the end results of the projects and tasks we are involved in, regardless of the person ultimately in charge of the project. We not only perform our tasks as described in our job descriptions and hope that others perform theirs but we take an active interest in the projects and tasks and willing to contribute to them
- **Mutual support**
  Treat each other with respect and dignity Open to communicate and help. Always keep in mind that we share in the common cause.
- **Transparency**
  Anti-bribery and corruption policy are default options in the company. We do not tolerate any form of bribery or corruption. We do not bribe any public official or private person and we do not accept any bribes. We support fair competition with the Partners and will not breach competition laws and regulations.
- **Data privacy**
  We respect the privacy rights of our Partners, vendors, employees. We inform individuals of collection and processing of their personal data, allowing them to make informed decisions and exercise their rights. We collect and process personal data for specific and legitimate business purposes only and secure such data against unauthorized access.

Code of Business Conduct: who we work with

- **Law & Guidelines Compliance**
  Law-abidingness is one of the key factors of the activity of the company. This commitment also includes all guidelines and policies which its Partners should abide.
- **Anti-bribery policy**
  IRES believes that integrity and fair dealing are essential assets of the company and this should be reflected in all activities. Each Partner of the company has to ensure that the company is not involved in any corruption.
- **Labor and Human Rights**
  IRES is an equal opportunity employer. Employment there is based solely upon ability. There’s no discrimination on the basis of ethnicity, religious beliefs, national origin, ancestry, pregnancy status, gender or gender identity, age, marital status, disability, medical condition, sexual orientation, or on any other basis protected by law. We will make reasonable accommodations to meet our obligations to accommodate disabilities and religious practices.

Labor and Human Rights (continued)

We expect our Partners to adopt similar policies, and respect and protect fundamental human rights across their value chain in accordance with international standards set forth by the United Nations Universal Declaration of Human Rights and the International Labor Organization's Fundamental Conventions, including:

- **Freely Chosen Employment. Forced, bonded or indentured labor or involuntary prison labor is prohibited.**
- **Child Labor. No person shall be employed younger than age 18 unless specifically permitted by laws of the country where the person is employed. Nor shall the Supplier interfere with a child's education by employing a child in violation of a country's compulsory education laws. Supplier may use legitimate, voluntary workplace apprenticeship programs, such as student internships, as long as they comply with all laws and regulations. Workers under the age of 18 will not perform work that is likely to jeopardize their health, safety or well-being.**
- **Discrimination, Harassment or Abuse . Every employee should be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse. Partners will not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, caste, disability, pregnancy, religion, political affiliation, union membership or marital status, in hiring and employment practices such as promotions, rewards and access to training.**
- **Health and Safety. Partners should provide a safe and healthy work environment to prevent accidents or injury arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities.**
- **Wages, Benefits, Remuneration and Working Conditions. Partners should pay applicable and fair legal wages under humane conditions, including maintaining reasonable employee work hours in compliance with applicable law and international standards.**
- **Women's Rights. Partners should ensure women workers receive equal treatment in all aspects of employment.**

Environmental Responsibility

- **IRES is committed to environmental responsibility.** We try to make a positive environmental impact through our actions, and we expect our Partners to share these ideas and goals. We actively seek and favor Partners that provide eco-efficient, sustainable products and services. We encourage our Partners to adopt the following strategic priorities:
- **Eco-Efficiency and Resource Reduction.** Partners should maximize the eco-efficiency of products and services across the life cycle, including sourcing, manufacturing, distribution, transportation, use and end-of life. Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.
- **Hazardous Substances.** Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

MODERN SLAVERY ACT 2015: SLAVERY AND HUMAN TRAFFICKING STATEMENT 2022

- Slavery and trafficking are prohibited in most national legislations and IRES complies with applicable legislations.
- We are committed to the principles in the UN Global Compact, the UN Guiding Principles on Business and Human Rights. All these international regulations and guidelines prohibit slavery and forced labor.
- Our Code of Conduct expresses zero tolerance for any form of modern slavery including forced – or compulsory labour, as well as convict/prison labour; indentured, forced, bonded and any form of child labour in any part of our business or in our supply chain.
- Breaches against our Code of Conduct, policies, or applicable law can be directly reported to a director or line manager.
- The IRES Code of Conduct requires all our suppliers, subcontractors, agents and other third-parties involved with the delivery of company services, to not engage in or support the use of any form of forced, compulsory or illegal labour, including trafficking, child, prison labour or bonded labour.
- We monitor and evaluate the risk of violations of our Supplier Code of Conduct and so far,, as we are aware, there have been no such violations to date. We also perform audits of identified high-risk suppliers. We require that suppliers, contractors, distributors, and agents make every effort to comply with the Code of Conduct.
- We are not aware of any instances of non-compliance.

- This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 31, 2022.

Integrated Real Estate Services

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