



## Supplier Code of Conduct

2024

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### FOREWORD BY THE MANAGEMENT BOARD

Dear business associate,

Vesteda is committed to doing business in a socially responsible and sustainable manner. We consider a high standard of corporate responsibility in terms of ethics, the environment and society to be essential and we also require this of our business associates.

This Vesteda Supplier Code of Conduct focuses on social responsibility, acting ethically and sustainably. Acting ethically means doing the right thing, even when no one else is looking. We feel it is important to explain in one document what Vesteda stands for, based on its core values and as an organisation, and what it expects from its business associates in this context.

We expect our business associates to apply the Vesteda Supplier Code of Conduct to their employees and their own business associates, thus ensuring that the principles of this Code of Conduct are reflected throughout the supply chain.

You will receive the Vesteda Supplier Code of Conduct as part of your contractual relationship with Vesteda. In addition to the provisions in this Vesteda Supplier Code of Conduct, it goes without saying that your company must comply with all applicable legal and regulatory requirements and contractual obligations.

Vesteda Management Board and Management Team



## INTRODUCTION

### Social responsibility

Vesteda invests in homes with funds from institutional investors, such as pension funds and insurers. With the returns they generate on their investments, our investors pay the pensions of their members and the benefits paid to their policyholders. This means that Vesteda has a social responsibility to invest carefully and responsibly. Vesteda is expected to carry out this social role **transparently, responsibly** and **ethically**. This makes having and maintaining a good reputation self-evident.

### Our core values

Vesteda's core values are **Collaborative, Confident, Ambitious, Enterprising** and **Service-oriented**. These core values serve as the foundation for the choices Vesteda makes as an organisation and as individuals.

### Sustainability

Vesteda's ambition is to be the sustainable leader in our segment, focusing on our tenants and their housing happiness. To achieve a sustainable portfolio and gain knowledge, Vesteda has set itself three sustainable development goals, based on the United Nations Sustainable Development Goals.

### Sustainable Development Goals

The Sustainable Development Goals are an integral part of Vesteda's business plan and are reflected in all of its business activities:

- Sustainable cities;
- Affordable and sustainable energy; and
- Responsible consumption and production.

Vesteda has translated the development goals into concrete actions, which can be summarised in the following topics:

1. Reducing energy consumption by improving the energy efficiency of our buildings
2. Reducing the CO<sup>2</sup> emissions of our buildings (fossil free)
3. Creating safe and accessible buildings

### Vesteda Supplier Code of Conduct

Vesteda drew up and implements the Vesteda Supplier Code of Conduct (hereafter: **'the Code of Conduct'**) on the basis of Vesteda's core values, the IVBN Code of Ethics, the IVBN Members Supplier Sustainability Statement, and the principles and relevant legal and regulatory requirements applicable to Vesteda.

### About Vesteda

Vesteda is a residential investor and landlord with a focus on sustainable and affordable housing in the Netherlands. Vesteda invests funds from institutional investors, such as pension funds and insurers.

Vesteda's rental portfolio consists of approximately 28,000 housing units. Vesteda's homes are primarily located in economically strong regions and metropolitan areas in the Netherlands.

Vesteda is cost efficient and manages its real estate in-house. Vesteda is committed to the realisation of a sustainable residential portfolio.

## VESTEDA SUPPLIER CODE OF CONDUCT

### Supplier

A party under direct contract with Vesteda and/or its entities that provides goods and/or services that impact one or more of Vesteda's properties.

Vesteda expects Suppliers to make every effort to communicate the Code of Conduct to their employees and their own business associates, as applicable, and to offer them the opportunity to ask questions about it and/or to (anonymously) report possible abuses.

If Vesteda finds that a Supplier fails to comply with the Code of Conduct, either structurally or incidentally but with significant impact, this may be grounds to terminate the agreement with the Supplier.

### Compliance with legal and regulatory requirements

Suppliers shall comply with applicable legal and regulatory requirements and ensure that their operations and services comply with all applicable legal and regulatory requirements.

## BEING A GOOD EMPLOYER

Suppliers shall demonstrate that they are a good employer for their employees. Suppliers provide employees with equal opportunities and rights regardless of race, gender, origin, sexual orientation, or political and religious beliefs. Suppliers encourage diversity, an inclusive engaged and ethical culture, and eliminate any other form of discrimination.

Suppliers shall respect the human rights and privacy of everyone, and treat everyone with respect and dignity. Suppliers promote the personal development of their employees through education and training.

Suppliers shall respect employees' freedom of association and also the right to openly discuss their working conditions with management without fear of harassment, fines, interference or sanctions in any form whatsoever.

### Working conditions

Suppliers shall respect workers' rights and comply with all applicable legal and regulatory requirements in the country or countries in which they operate. This includes all rights and minimum requirements related to employee benefits, working hours and working conditions.

#### *Safe working environment*

Suppliers shall ensure safe working conditions for their employees. Suppliers protect the physical integrity and health of their employees. Suppliers prevent harassment, threats and any form of inappropriate behaviour.

#### *Human trafficking*

Suppliers shall refrain from using or providing labour or services that have been sourced illegally and in particular through migrant smuggling or human trafficking.

#### *Forced labour, exploitation*

Under no circumstances shall Suppliers be allowed to hire, employ people against their will, or do business with business associates who engage in and or promote

such practices. Suppliers shall not engage in recruiting, transporting, transferring, harbouring or receiving persons by force, fraud or coercion with a view to exploitation.

#### *Child labour*

Suppliers may not engage in child labour or do business with business partners who engage in child labour. 'Child' means a person who is younger than the local minimum legal age applicable to employees who do the work, provided that such legal age is in line with the minimum age for employment as set by the United Nations International Labour Organisation.

Vesteda expects Suppliers to make an effort to prevent and combat human trafficking, child labour, forced labour and exploitation within their organisation.

#### *Alcohol and drugs*

Suppliers have a duty of care towards their employees and shall at all times prevent employees from being under the influence of alcohol, drugs or other mind-altering/narcotic substances while providing services to Vesteda. Nor are the Supplier and/or its employees permitted to possess, use or trade in said substances during the provision of services to Vesteda.

The use of alcohol, drugs and other mind-altering/narcotic substances may negatively affect the performance of the Supplier and/or its employees and lead to dangerous situations for the Supplier and/or its employees, Vesteda employees, tenants and (the reputation of) Vesteda.

## ETHICAL BUSINESS OPERATIONS

Vesteda attaches a great deal of importance to the professional and honourable conduct of its employees, Suppliers and other external business associates.

Vesteda expects Suppliers to operate with integrity and transparency. Vesteda expects Suppliers to have appointed a confidential adviser and to have established

a policy and procedure(s) for the internal reporting of inappropriate behaviour, abuse and/or suspicions of such behaviour by employees.

Vesteda expects that when Suppliers and/or their employees suspect or observe irregularities or abuses at Vesteda's premises in the performance of their services, they report this to their regular contact person or to Vesteda's [Compliance Officer](#).

When Suppliers and/or their employees have a suspicion or indication of unethical behaviour when working with a Vesteda employee, Vesteda expects the Supplier to report this to Vesteda's [Compliance Officer](#). Such reports will be treated as strictly confidential and with the utmost care.

Any suspicion or indication of unethical behaviour, irregularities or wrongdoing can be reported anonymously via the [SpeakUp](#) platform.

#### SpeakUp - Externals

Telephone number 010-700 7503 (free)

Web service [SpeakUp](#)

Access code 103454

#### Dealing with conflicts of interest

Vesteda attaches great importance to professionalism and integrity. It is therefore essential to prevent the (possible) mixing of business and personal interests, and any appearance of same.

Vesteda expects Suppliers to avoid, in their (business) contacts with Vesteda and its employees, any form of conflict of interest and/or situations that could create the appearance of a conflict of interest. Situations that could potentially lead to conflicts of interest between Suppliers and Vesteda will be discussed with Vesteda in advance.

Vesteda employees are not permitted to approach or hire Vesteda's business associates, including Suppliers, for private purposes under conditions agreed between Vesteda and Suppliers. Vesteda expects Suppliers not to offer and/or provide their services to Vesteda employees unless Vesteda's Management Board (and Management Team) has given its express, written consent.

To prevent conflicts of interest and any appearance of such conflicts, Vesteda expects employees who hold an interest in or have a private relationship with a Supplier and/or its employee(s) in a relevant position to proactively disclose this when Vesteda intends to enter into a (renewed) cooperation with the Supplier. Vice versa, Vesteda expects Suppliers to proactively disclose any private relationship with a Vesteda employee.

#### *Gifts and invitations*

Vesteda never offers business gifts with the aim of improperly influencing someone. Suppliers are not allowed to exchange gifts or invitations with the aim of influencing Vesteda, its employees and/or other business associates, or to gain unfair competitive advantage.

In their relationship with Vesteda, suppliers shall ensure that offering or receiving gifts or invitations is not intended to influence and does not violate Vesteda's rules and standards.

Vesteda applies the following rules for receiving gifts or invitations by its employees:

- Gifts or invitations with an estimated value of up to € 100 (per year) may be accepted;
- Gifts in the form of cash or vouchers are not permitted.

## Due diligence

Suppliers are expected to carry out reasonable due diligence when entering into an agreement with a new business associate to prevent corruption and influence. This includes partnerships and the use of intermediaries, subcontractors and self-employed workers (freelancers).

### *Competition*

Vesteda expects Suppliers to observe applicable competition law at all times. Suppliers are not permitted to enter into tender agreements or prohibited price agreements with competitors or other market parties.

Suppliers shall comply with all applicable antitrust, competition and unfair trade practices legislation. In doing so, they shall refrain from practices such as the improper exchange of information and data, price fixing with competitors, manipulation of tendering procedures, the improper division of customers or territories or other practices that restrict competition in an unlawful manner.

### *Anti-corruption*

Vesteda considers all forms of corruption and/or influence unacceptable and these practices will not be tolerated. Vesteda expects Suppliers to have established and to implement an anti-corruption policy within their organisation.

### **Corruption**

The abuse of authority or position with the purpose of personal gain, either actively (bribing) or passively (being bribed). Forms of corruption include bribes, kickbacks, facilitation payments, embezzlement and extortion.

## Confidential information and intellectual property

Suppliers shall treat all business information and intellectual property of Vesteda, its employees and/or its tenants, including personal data disclosed to Suppliers in connection with the provision of services, as confidential, shall use it only for business purposes and shall keep it secret from third parties. The duty of confidentiality applies during the cooperation and shall continue to apply after termination of the cooperation, unless Vesteda waives this duty in writing.

Suppliers shall not infringe on the intellectual property rights of third parties when providing goods and/or services to Vesteda.

## Privacy and data protection

Suppliers shall ensure that all business information and intellectual property of Vesteda, as well as any personal data of its employees and/or its tenants, provided to Suppliers in the context of the provision of services, is kept secure and adequately protect it against cyber-attacks, theft, loss and similar risks. Vesteda expects Suppliers to report any suspected or actual data breach involving the personal data of Vesteda's tenants to Vesteda's Compliance Officer without delay, but no later than 72 hours after discovery, providing all relevant information, via the [Data breach notification form: Externals](#).

## Non-compliance

Vesteda expects Suppliers to respect the Code of Conduct and to act in accordance with the letter and spirit of the Code of Conduct. Among other things, non-compliance with the Code of Conduct may have consequences for Vesteda's reputation. If Vesteda reasonably suspects or finds that a Supplier is not complying with the Code of Conduct, this may be grounds to terminate the agreement with the Supplier.



### Duty of care

Vesteda expects its Suppliers and their employees, to the extent they provide services to Vesteda tenants, to act with due care and attention<sup>1</sup> and to observe the following rules of conduct in their contacts with Vesteda's tenants:

#### *Attitude and courtesy*

The Supplier and/or its employees:

- have a valid proof of identity, which will be shown to the tenant upon request;
- wear recognisable company clothing;
- always wipe their feet upon entry, regardless of the condition of the property;
- are polite and courteous to the tenant, other residents and stakeholders;
- do not use swear words or other indecent language in communication with the tenant;
- ask the tenant for permission to move private items (e.g. furniture);
- do not smoke in the apartment or complex, including in the immediate vicinity of entrance doors or private gardens.

#### *Approaching tenants*

The Supplier and/or its employees:

- upon entry, inform the tenant about the purpose of the visit, referring to the appointment made for this purpose (including the expected duration);
- when leaving, ask whether the tenant is satisfied, have the work order signed off, explain what work has been carried out and, if necessary, inform or advise the tenant when the item worked on can once again be used in its entirety.

#### *Preventing damage*

- take measures to protect the property of the tenant and third parties from contamination and damage;
- prevent as much nuisance and inconvenience as possible during the performance of the work;
- upon completion, leave the place where the work was carried out neat and tidy, in the same condition as it was found upon entry.

#### *Feedback to Vesteda*

- report any Damage incurred immediately to the tenant and to their regular contact person and/or contractor at Vesteda;
- report disagreements with or refusal on the part of the tenant immediately to their regular contact person and/or contractor at Vesteda.

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<sup>1</sup> 7a:1781 BW

## Environment Social Governance

### Sustainable residential portfolio

Vesteda is committed to the realisation of a sustainable residential portfolio, with the focus on the resident and their housing happiness.

Vesteda expects its Suppliers and their products and services to comply with applicable environmental legislation and with all statutory regulations and industry standards and quality marks.



### Environment Social Governance (ESG)

Vesteda expects its Suppliers to be familiar with the term ESG and any related topics, including sustainability, governance and social responsibility. Vesteda expects Suppliers to be aware of their role, contribution and responsibilities in the context of ESG within the real estate supply chain.

Vesteda expects Suppliers to make ESG part of their business operations and the products and/or services they (can) supply to Vesteda. Vesteda also expects Suppliers to proactively communicate ESG-related matters to their employees and cooperation partners within the chain.

