

Political Involvement and Freedom of Association Policy

1 INTRODUCTION

- 1.1 Freedom of association is a foundation of a democratic society and is essential in the area of business and employment. Accolade upholds the principle that all employees have the right to freely associate, join, or form organizations of their choice without fear of reprisal or discrimination. Accolade recognizes the importance of political engagement and the fundamental right of individuals to participate in the political process. This policy is designed to outline the principles and guidelines that govern the political activities of our employees, stakeholders, and the Accolade as a whole. Our commitment to political neutrality is paramount, ensuring that personal political orientations do not influence our business operations, decisions, or the professional environment.

2 SCOPE AND PURPOSE

- 2.1 This policy applies to all employees, contractors, suppliers, and other business partners of Accolade, regardless of their position, location, or the nature of their affiliation with Accolade ("**Associated Persons**"). It covers clear guidance on the appropriate way to engage in political activities, ensuring that such actions are conducted in a manner that upholds Accolade's reputation and commitment to neutrality.
- 2.2 This policy also affirms Accolade's commitment to the democratic principle of employees' freedom of association within the workplace.

3 PERSONAL POLITICAL ACTIVITIES

- 3.1 **Right to Participate:** Every Associated Person has the right to their own political beliefs and the freedom to participate in the political process on their own time and resources.
- 3.2 **Separation from Business:** Associated Persons must ensure that their personal political activities are kept separate from their work responsibilities and do not interfere with their duties at Accolade.
- 3.3 **Use of Accolade Resources:** Accolade's resources, including work time, telephones, computers, email, and other assets, must not be used to support personal political activities or campaigns.
- 3.4 **Non-Endorsement:** Associated Persons should not imply that their personal political views or activities are endorsed by or associated with Accolade.

4 ACCOLADE POLITICAL NEUTRALITY

- 4.1 **Neutral Stance:** Accolade maintains a strict stance of political neutrality. It does not endorse, support, or oppose any political party, candidate, or campaign. It does not lobby on topics that would have an adverse effect on environmental and social areas.
- 4.2 **Business Decisions:** All business decisions will be made based on economic, legal, and ethical considerations, without regard to the political affiliations of any party involved.
- 4.3 **Corporate Contributions:** Accolade does not make contributions to political parties, candidates, or campaigns. This includes monetary contributions, in-kind services, or the use of Accolade property or resources for political purposes.

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5 EMPLOYEE ENGAGEMENT AND INCLUSIVITY

- 5.1 At Accolade, we recognize that our employees are the foundation of our success. Their expertise, dedication, and collaborative efforts drive Accolade forward. We are dedicated to nurturing an open and inclusive workplace culture where every team member feels valued, heard, and motivated to reach their full potential. By encouraging a diverse range of perspectives and ideas, we create a dynamic and innovative atmosphere that benefits both our employees and our business objectives.

6 RESPECT FOR ASSOCIATION RIGHTS

- 6.1 Accolade respects the underlying right of all employees to freely associate, whether that means joining or forming a trade union or participating in collective bargaining.

7 COMPLIANCE AND ENFORCEMENT

- 7.1 **Responsibility:** It is the responsibility of all Associated Persons to understand and comply with this policy. Any questions regarding political activities should be directed to the legal department.
- 7.2 **Violations:** Violations of this policy may result in disciplinary action, up to and including termination of the relationship between Accolade and Associated Persons.

8 FINAL PROVISIONS

- 8.1 Accolade's commitment to political neutrality and to the freedom of association is essential to our integrity and the trust we have built with our clients, partners, and the community. By adhering to this policy, we ensure that our focus remains on delivering exceptional real estate investment services, free from the influence of individual political affiliations. By fostering a workplace that respects these freedoms, we not only comply with international labour standards but also enhance Accolade's integrity, employee satisfaction, and overall performance. We remain loyal in our belief that a respectful and open dialogue between management and employees is key to achieving our shared goals and sustaining our position as a leader in the real estate investment industry.
- 8.2 The COO and the Group Legal Counsel of Accolade shall ensure that regularly, not less than every two years, this policy is revisited and reevaluated in light of development of Accolade's business and applicable laws.
- 8.3 This Policy was reviewed by the COO and the Group Legal Counsel of Accolade and approved by the Board of Directors of Accolade Holding, a.s. as the parent company of Accolade on 30 June 2025.