

Code of Conduct

1 INTRODUCTION

1.1 Introduction to Our Ethical Framework

At Accolade, our ethical framework isn't just a list of suggestions; it's the foundation of our professional integrity. Upholding this framework is essential because it demonstrates our commitment to the highest standards of honesty and ethical behaviour in business.

Our business partners, tenants, regulators, and other stakeholders expect this from us, and we strive to not only meet but exceed these expectations. Accolade is committed to being a role model in the industry, encouraging others to follow our lead in ethical business practices.

1.2 Individual Responsibility

The success of our company hinges on the choices and actions of each person at Accolade, whether interacting internally or with external partners. Every action at Accolade must align with the standards set in our ethical framework. Those in leadership roles have additional responsibilities; they must lead by example and ensure their teams uphold our ethical principles.

1.3 Commitment to High Ethical Standards

While compliance with the law is a given, we aim to go further. Accolade holds itself to the highest ethical and moral standards. Our membership in the United Nations Global Compact since 2023 demonstrates our commitment to its core principles regarding human rights, labour, the environment, and anti-corruption. We respect fundamental human rights and follow the United Nations' guidelines on business and human rights. We ensure working conditions that respect the Fundamental Principles and Rights at Work as defined by the International Labour Organization. Our business practices are shaped by the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. We are conscious of our environmental footprint and are dedicated to setting a high standard within the real estate sector.

1.4 Encouragement to Seek Guidance

Our ethical framework is detailed further in Accolade's internal policies. Navigating ethical dilemmas can be challenging, and our policies are designed to offer clear instructions. However, it's your critical thinking that ultimately ensures your actions reflect our code and Accolade's core values. If you're ever uncertain, don't hesitate to speak to your manager or contact the legal department. It's always better to prevent a problem than to correct one.

2 RESPONSIBLE COMPANY

2.1 Accolade's business stands on core values:

Your work for Accolade should always be in compliance with our core values. We base our business on a mutual trust with our clients, colleagues, suppliers, business partners and investors. We always strive to achieve the best possible reputation with our partners. Thus, we can achieve long-term success with no limits to our growth. Be aware that reputation is hardly built and easily lost.

2.2 Construction safety, hazardous materials and environmentally friendly buildings:

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Accolade is aware of all environmental issues that come with our business. We therefore do our best to protect the environment around us. All our buildings should be constructed in a way that has the lowest possible negative impact on the environment. Every decision you make at Accolade should help advance our environmental objectives.

During our business, we use the most sustainable materials possible, both in our real estate portfolio and our office work. In all situations, you should prioritize the use of sustainable materials.

All resources you use should be consumed efficiently and waste production must be minimised. You should take all precautions to prevent waste creation. If the creation of waste is unavoidable, the waste management should be sustainable and safe, with mitigation of hazards to people and the environment. You are obliged to comply with all waste regulations.

If we have to use hazardous materials, you should take all precautions to ensure their storage, handling and disposal is safe and compliant with all rules for the specific type of hazardous material.

Through your preventive attitudes and behaviours, you should prevent all forms of pollution. We understand that sometimes pollution is inevitable, in those situations you should minimize it, especially carbon emissions.

While working on Accolade's projects, your contribution should help achieve the aim of having buildings with low carbon footprint, that help resources to be used efficiently, maximise recycling opportunities and usage of renewable energy, rely on electrification and are operated in a modern digital way. All our facilities should be resource-efficient and include modern technologies that reduce utility consumption.

Accolade constructs and owns sustainable real estate. A large amount of Accolade's portfolio is BREEAM and/or DGNB certified. Certification of Accolade's buildings as green is obligatory and you shall ensure that our buildings meet the green certification standards.

Your work should help Accolade invest in projects which revitalise sites that have been abandoned and are falling into disrepair. Usage of land for Accolade's projects should be responsible and respectful of biodiversity and forests.

2.3 **Permits and authorisations:**

All Accolade's operations are conducted strictly in compliance with relevant permits and authorizations. You are obliged to be acquainted with what we are and what we are not allowed to do, and to implement it in your work.

2.4 **Focus on Renewable Energy:**

All Accolade's operations are conducted with focus on introduction and usage of renewable energy sources.

2.5 **Health a safety during constructions:**

The health and safety of workers and future tenants are a priority during construction for Accolade. Accolade uses materials that do not cause harm to people and uses processes that lessen the chance of workplace incidents while at the same time creating spaces that support the well-being of tenants and visitors.

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2.6 **Sustainable cities and communities:**

Accolade conducts construction with respect to communities whose lives and livelihoods may be affected. Accolade strives to leave a positive social impact.

2.7 **Being a responsible entrepreneur:**

During all courses of business, you are obliged to respect all applicable laws and regulations. Do not rely only on what applies in the Czech Republic or other country you are familiar with. Each country has its own legislation, and it is our duty to respect all of them.

Accolade's business always meets good morals of the competition. Never use business or marketing practices that are misleading or otherwise unfair.

Never engage in anything that can be seen as violating applicable anti-trust and competition rules. If we become a dominant player, we must never abuse this position both in relation to our customers and our competitors. You should never enter into agreements (whether formal or informal) that could undermine the competition. This includes agreement on prices with some competitors, division of the market, setting of profit margins or participating on a boycott of some companies. Always take care when dealing with competitors in order not to give a reason for potential competition investigation.

Always comply with applicable tax regulations. Keep all the records and communication with tax authorities accurate and reflective of the actual financial state of Accolade. Be especially careful in dealing with cross-border transactions. We should pay taxes and all applicable contributions to public funds on time and in full.

Accolade respects international law and complies with all applicable trade and economic sanctions imposed by the United Nations Security Council, the European Union, Government of the Czech Republic and authorities of other relevant jurisdictions. Always take extra precautions when dealing with countries which are subject to sanctions. Since business structure of our partners may change, we need to regularly verify, whether part of their business structure is not subject to sanctions.

During our business activities, you might get acquainted with sensitive business information about our business partners issuing financial instruments. If you are aware of any information that if available to the public would influence the price of such instruments, you are obliged to refrain from trading with those instruments. Similarly, do not advise your relatives, friends or other persons on trading with such instruments even without disclosing the business operation. Accolade takes all necessary measures to prevent any form of market abuse.

Accolade keeps accurate books and records. Whenever you participate activities which are related to financial transactions of Accolade you must provide timely, honest and complete information. Any discrepancies in Accolade's records may lead to liability for Accolade or the responsible person. In addition, accurate records help Accolade to make proper business decisions.

2.8 **Anti-Bribery and Corruption:**

Accolade opposes any form of bribery and corruption. Bribery and corruption might lead to expectations of reciprocity that would not be done in a normal course of business. Bribes do not have to exist only in the form of cash. Any favour, gift, payment of expenses, discounts, entertainment or other form of service can constitute a bribe. During the course of work,

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you should never directly or indirectly donate gifts or offer bribes to employees, stakeholders, business partners, suppliers or any other individual with the intent to bribe or influence them in any other way.

We are aware that gifts and entertainment might be necessary for a normal course of business, but we need to keep them in a level that does not create doubts on our integrity. Giving and receiving gifts must meet the strict requirements set by a specific internal policy and all received gifts have to be reported to the legal department. The same applies to entertainment, travel and other forms of hospitality. There might be times when you have to refuse a gift. But as we expect our business partners to accept our policies and standards our business partners can expect this from us. Do not engage in providing hospitality against the rules of the accepting party even if it is in accordance with our rules. Be especially careful when dealing with politicians and other public officials. Engaging with them is always subject to extra scrutiny and any questionable step may lead to a reputational risk to Accolade. No matter the situation, always use your critical thinking and moral compass. Just because something is common and standard on the market does not mean it is OK and in the future will not be seen as a failure.

Accolade is interested in supporting good causes, but we are aware that there are people who hide fraudulent activities under the mask of a charity. Some charities might be a disguise for corruption and money laundering. All charities and pro bono projects are subject to scrutiny and review before we start cooperating with them.

For further understanding, please refer to the Anti-Bribery and Anti-Corruption Policy.

2.9 **Political Involvement**

Accolade is an apolitical organisation and provides no direct or indirect support to political parties and/or lobbying organisations. There might be times when Accolade has business interest in engaging in the public sphere (such as consultation on legislation). Since we need to avoid any legal or reputational risks all such activities of Accolade need to be approved.

This does not mean that you should refrain from political activities in your everyday life. Accolade fully supports if its employee's engagement in public affairs. You are required to separate your political activities from your position within Accolade and should never use Accolade's name or resources.

For further understanding please refer to the Political Involvement and Freedom of Association Policy.

2.10 **Data Protection, Confidentiality Obligations:**

Accolade fully protects employees' privacy. We process personal data of all our employees in compliance with all applicable standards. Personal data are processed only for the purposes that are necessary and accessible to people who need the personal data to fulfil their professional duties. If you have access to personal data of your fellow colleagues, always proceed with care and do not disclose them to anyone unauthorized. Accolade's information management is set to prevent any leaks of personal data.

Similarly, as we care about personal data of our employees, we put attention also to data of our business partners. Dealing with customer data or any other data related to Accolade's business must be done with due care doing the best to avoid any data breach. If you are working with sensitive data, you always have to comply with data security and confidentiality law, internal policies of Accolade, latest information security standards and undertakings

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Accolade gave to its customers.

Whatever information you are processing you always need to respect its confidential nature and protect Accolade's trade secrets. Any unauthorized disclosure of sensitive information might lead to legal, reputational, business, financial or other risks to Accolade. Do not share confidential information with your loved ones or your friends. Even if they act in good faith, they might accidentally reveal information about Accolade to persons who want to harm us. If you are unsure whether to say something, think whether the other person needs to know what you are going to say, or it is only nice to know for them. Disclose only if the other person needs to know.

2.11 **Money Laundering:**

Money laundering is a conduct leading to conceal an illegal origin of money in order to make an impression that it was obtained legally. Being a crime and highly unethical behaviour, Accolade does not engage in any form of money laundering. Be aware that we might be contacted by people who want to use our services to cover their illegally obtained money. You should be always vigilant about red flags such as change in corporate structure, lack of information on our business partners, usage of multiple bank accounts or participation of an otherwise not involved person. Real estate sector is especially vulnerable to those issues. Everyone should be on the lookout to avoid socialising and associating with persons suspected of money laundering.

2.12 **Ethical Business Practice:**

Accolade conducts its operations with respect to fair and ethical business practices. Our clients choose us because they expect a fair business partner with the highest personal and professional standards. We always look at the needs of our clients.

Accolade builds transparent relationships with its business partners. High ethical standards we impose on us go hand in hand with knowing and understanding our clients and their business. Before conducting business with them we verify our business partners and expect that they will respect fundamental principles of business ethics.

3 RESPONSIBLE EMPLOYER

3.1 **Equal Opportunity:**

Any form of discrimination against workers and job seekers is strictly prohibited. Accolade treats everyone without distinguishing on the grounds of race, colour, religion, national origin, sex (including pregnancy and gender identity), age, disability, political affiliation, trade union membership, marital status, sexual orientation, philosophical belief or other non-merit factors. Accolade puts special emphasis on disabled employees and employees expecting or having children.

Inclusion and diversity are embraced and encouraged. We understand that great minds do not think alike, and we can achieve the best results if we engage a broad range of perspectives in our work.

All workers are equal in the opportunities Accolade gives them.

For further understanding please refer to the Anti-Discrimination and Anti-Slavery Policy.

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3.2 **Dignity and Respect:**

The only criterion we apply when making decisions on our employees are their capabilities and performance. Diligent work, constant improvement and doing your best is what we expect from you in Accolade.

Accolade adheres to all fundamental human rights principles stated in the international charters and conventions and the Charter of Fundamental Rights and Freedoms. This includes prohibition of any forced labour, child labour and human trafficking, respect to employee's privacy and freedom of expression. Accolade strictly adheres to working conditions and health and safety requirements set by law.

Everyone is treated with respect to their personal dignity and personal honour. All our relations in Accolade are based on a mutual trust. Your obligation with your fellow employees is to treat them with respect and you can expect that they will respect you as well. In Accolade, we value that everyone is unique.

Any form of harassment and discrimination is strictly prohibited. Accolade strives to prevent harassment and bullying. Apart from having to abstain from those behaviours you always need to speak up when you see them. Letting things unsolved causes further harm to the victims. You should abstain from any form of sexual or other harassment or usage of offensive language.

Accolade ensures a violence-free workplace. All disputes are to be resolved in a peaceful way. Do not use any form of violence.

For further understanding, please refer to the Anti-Discrimination and Anti-Slavery Policy.

3.3 **Freedom of Association:**

You are free to engage and interact with your fellow employees. Healthy relationships at the workplace help Accolade's business success.

Free speech in the workplace is guaranteed. Employees can communicate and express their views with the management concerning their working conditions and operation of Accolade's business without encountering any form of reprisal or harassment.

Union rights are respected. If employees decide to unite to collectively pursue their interests, bargaining will be conducted in accordance with all applicable legal provisions and with respect for the union representatives.

For further understanding, please refer to the Political Involvement and Freedom of Association Policy.

3.4 **Wages, Benefits and Working Hours:**

Accolade works in accordance with all applicable labour laws and regulations. You can always expect that conditions such as working hours, breaks, holidays, maternal and parental leave meet the requirements of law. We give special attention to work of pregnant women and underaged employees with adherence to strict prohibition of child labour.

Management ensures that all financial and nonfinancial compensation to the employees is compliant with law, is fair and reflects qualities of the employee.

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3.5 **Free Choice of Employment:**

Accolade accepts that being in an employment relationship is an exercise of a fundamental right and it is the employee's right to choose its employment. You will never be forced to remain at work against your will.

Accolade is dedicated to operating its business with a steadfast adherence to legal and ethical principles. All forms of (modern) slavery, including child labour, forced labour or human trafficking, are prohibited.

For further understanding please refer to the Anti-Discrimination and Anti-Slavery Policy.

3.6 **Workplace environment:**

Accolade complies with all applicable health and safety regulations. All employees are entitled to healthy and safe workplace meeting all the necessary requirements.

If necessary, you are entitled to use protective equipment. Make sure that you do everything to protect your health and safety. Speak up if a problem appears.

3.7 **Emergency Response:**

Being part of safety precautions, our employees are provided with emergency response planning. All employees can assess, identify, and prepare for emergencies.

Accolade provides regular training and guidance on how to respond to various types of emergency situations. These include, but are not limited to, natural disasters (such as fires, floods, or earthquakes), data loss or unavailability, software or system failures, pandemics, power outages, unexpected technical incidents, restricted access to office premises, and sudden changes in company leadership.

Accolade's goal is to ensure that every team member remains informed, alert, and capable of responding appropriately to protect their own safety, safety of their colleagues, and the continuity of our operations.

3.8 **Flexible working:**

At Accolade, we value working from the office as it helps us foster a strong company culture, encourage collaboration, and support effective knowledge sharing within the team. At the same time, we recognize the importance of flexibility in promoting a healthy work-life balance.

Employees have the opportunity to work flexibly, with the understanding that all responsibilities and tasks remain the same, regardless of location. Flexible working arrangements are subject to applicable legal requirements and Accolade's internal policies.

3.9 **Social responsibility:**

Accolade considers itself a responsible part of the society. Doing our business and treatment of our employees is conducted in a socially responsible way. Accolade thrives to support good causes. Social responsibility is embedded in our company culture and reflected in how we operate, grow, and contribute to the communities where we are active. We aim to create long-term value not only for investors, but also for society as a whole.

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Accolade wields a substantial influence on the generation of economic value across its entire value chain, catalysing positive outcomes for society. By introducing new and contemporary operations, particularly in the realm of light manufacturing, we revitalise entire regions and help prevent the migration of skilled workers. We are also committed to providing advanced logistics infrastructure, which supports local economies and drives regional growth. In parallel, we actively promote equal opportunities, support access to education and career development, and engage in partnerships that strengthen community life and resilience across the areas where we operate.

4 RESPONSIBLE EMPLOYEE

4.1 Being a respectful colleague:

During the course of your work, we expect you to follow the guidelines set out in this Code of Conduct. As an Accolade employee, in the eyes of our partners you do not only represent yourself but also Accolade as a whole. Our image is also based on your actions.

You should treat all your colleagues, Accolade customers and all persons you meet during your course of work in Accolade with respect. Good business relations always start at the personal level.

You should abstain from unnecessary office politics creating unhealthy environment. Do not create groups with the aim of harming another colleague. You should not talk behind your colleague's backs or abuse your colleague's trust to pursue your own aims.

4.2 Making fair business decisions and avoiding conflicts of interest:

Everything you do for Accolade should be in its full interest. There might be situations in which you (or your relatives and/or friends) might be interested in certain outcome of Accolade's business decision, such as when your close relative works for Accolade's competition. Based on your critical assumptions you should make a sound judgement on whether the specific situation might lead to a potential conflict of interest. Being in a conflict of interest as such does not mean that you did anything wrong. Nevertheless, if you manage to have any potential conflict of interest you should immediately disclose it. Even though you would not misuse your position, without disclosure questions might arise, whether you are not hiding something. If you suspect that you may be in a conflict of interest, you should stop taking decisions before consulting your supervisor.

Having close relations with one of your colleagues excludes you from having a mutual hierarchical relationship within Accolade.

All information you gain as an employee of Accolade shall be used only for the benefit of Accolade. Do not use business information you receive for your personal benefit or for the benefit of a third party.

You are an employee of Accolade even outside work. You should abstain from personal decisions that could hamper your best business decisions as an employee of Accolade by creating a conflict of interest, such as buying lands relevant for Accolade's portfolio in your personal capacity, providing services to competitors, political activities for municipalities in areas that concern Accolade's business.

All expenditure taken on Accolade accounts should be approved by competent person other than the person making the expense. Every operation involving Accolade's finance should be

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evidenced with the name of both requesting and approving person.

4.3 **Protection of company property:**

All property of Accolade that is entrusted to you should be used for business purposes only. You should avoid using Accolade's resources for your personal needs without prior approval of your supervisors.

We understand that in certain situations you need to use Accolade's IT resources for non-business needs. In all these occasions you may use it only in a non-disruptive manner. Never visit website or use services that might compromise Accolade's IT structure. It is strictly forbidden to do any illegal activities or use any illegal software. All use of IT infrastructure of Accolade should comply with the latest standards of cybersecurity.

You are responsible for maintaining proper business records, relevant storage of company documents, especially related to regulatory requirements in compliance with applicable laws and internal policies of Accolade. You should delete or destroy all documents that are no longer necessary. You should never destroy documents which are, or might be subject to court dispute, internal audit or investigation, or investigation of a public authority.

Addictive substances have an impact on your decision-making process. Being under influence of drugs is strictly prohibited. While alcohol may serve beneficial social purposes, it should never have an influence on your professionalism, proper behaviour, and ability to make well-reasoned decisions.

You are obliged to protect all intellectual property of Accolade and other parties. Do not use trademarks, copyright-protected assets or other protected assets outside of Accolade business. Do not use material that might infringe rights of a third person. At all times you are obliged to protect Accolade's trade secrets and should not disclose them to third persons beyond what is absolutely necessary.

4.4 **Public image of Accolade:**

Unless you are specifically authorised, you shall not communicate with media and public. If someone contacts you in relation to Accolade, always instruct them to contact relevant media/public relations person in Accolade.

When using social media and instant messaging, always make sure that communication you make is clearly understandable as personal and not made on behalf of Accolade. Nevertheless, things you share on social media should not harm Accolade. The public image of Accolade is also made by private activities of its employees.

If you are entitled to represent Accolade, you should exercise due care and properly assess impact of your steps on Accolade's business. Communication on behalf of Accolade should be done responsibly to protect its brand and the values it represents. In all public activities you should consistently represent the Accolade brand in accordance with Accolade's standards. False and misleading statements and inaccurate representations can adversely affect business interests of Accolade.

4.5 **Use of Artificial Intelligence:**

Accolade is aware that AI is already part of our lives and serves to help us do our jobs. Nevertheless, if you use means of artificial intelligence, never stop relying on your own assessment. You should always use only approved AI tools with proper care, checking all

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outcomes you get from AI tools and respecting all privacy and data protection rules. Unless otherwise instructed, you should refrain from supplying AI tools with sensitive data, such as personal data or trade secrets.

4.6 **Handling Infringements:**

All employees who infringe laws, regulations, or internal policies of Accolade will face appropriate consequences as applicable under labour law. If you have grounded knowledge of infringement or violation of law, this Code of Conduct, or other regulations, you are obliged to notify the competent person of such act. Failure to report inappropriate behaviour is also considered a violation of this Code of Conduct.

5 **MAKING SURE EVERYONE RESPECTS THE RULES**

5.1 **If in doubts, everyone should report to the legal department and/or their manager:**

Ethical issues might be blurry, and we are aware that you might not be sure what to do even after reading this Code of Conduct or other relevant regulations. In these situations, you should always seek advice from your supervisor or the legal department when unsure of an appropriate course of action.

5.2 **Procedural requirements:**

You are responsible to get acquainted and act according to this Code of Conduct. If you do not understand or need further clarification, always ask. Acting in accordance with our standards is always a priority. You are obliged to take part of onboarding and yearly trainings to always keep in mind the obligations you have.

Do not be afraid to use your good judgement and critical thinking. Having a good moral compass is often a good indication whether something is problematic or not. If unsure, you should speak up.

All managers in Accolade have to oversee the implementation of this Code of Conduct and should be a model for the employees, who often rely on steps they see at the managerial level. Be active in implementing of this Code of Conduct with your subordinates. Take proper steps if you see that the principles set in this Code of Conduct are not followed. On the other hand, you should always listen to employee's concerns and reward them for keeping their integrity.

5.3 **Reporting requirements:**

Since we are aware that most issues can be resolved when someone speaks up, we follow strong reporting standards to protect any reporting person against any form of retaliation. Anyone who makes report in good faith should not suffer any detrimental treatment. In accordance with whistleblowing protection rules we ensure confidentiality of all persons reporting unlawful or unethical behaviour. Investigation of reports focus on solving the issue and preventing further problems, also by imposing disciplinary sanctions proportionate to the nature and circumstances of any breach of applicable regulations.

Any suspicion of unlawful or unethical behaviour in Accolade is followed by extensive internal investigation. Under requirements set by law, Accolade provides necessary and proper cooperation to the public authorities, such as environmental protection authorities or law

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enforcement. Accolade provides all necessary reports and provides full cooperation for proper handling of required investigations and audits. If you are contacted by a public authority or other external subject do not solve the situation by yourself but contact immediately the legal department.

You are encouraged to report any problematic behaviour no matter the level of hierarchy. If you suspect a member of Accolade's management, you may notify a different member of the management. Do not solve things by yourself and cooperate with the responsible persons. Do not make presumptions which information might be relevant, even details count. More information given in good faith makes the investigation more effective.

Investigation of reports is followed by measures intended to limit any potential future misbehaviour which may include review of internal policies, processes and systems and individual disciplinary actions.

6 FINAL PROVISIONS

- 6.1 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.
- 6.2 Violation of this policy or any confirmed misconduct may lead to disciplinary action ranging from a warning and termination of employment to a civil legal action and referral for regulatory or criminal prosecution.
- 6.3 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.