

Anti-Bribery and Anti-Corruption Policy

1 INTRODUCTION

- 1.1 Accolade is committed to conducting its business in accordance with the highest standards of integrity and in full compliance with all applicable laws, regulations, and policies regarding bribery and corruption. Our comprehensive anti-bribery and anti-corruption policy reflects our unwavering commitment to ethical business practices and the promotion of a culture that does not tolerate bribery or corruption under any circumstances.

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**"). The policy is designed to ensure adherence to all relevant anti-bribery and corruption laws and to affirm our commitment to ethical and responsible conduct in all business activities. The anti-bribery and anti-corruption policies and procedures of Accolade are designed to:

- (a) **Articulate a Zero-Tolerance Policy:** Clearly establish Accolade's unwavering policy against bribery and corruption.
- (b) **Global Application:** Ensure that all Associated Persons, regardless of their location, adhere to these standards.
- (c) **Define Prohibited Conduct:** Offer clarity on what constitutes "bribery" and "corruption", including examples and warning signs.
- (d) **Identify and Mitigate Risk Areas:** Provide comprehensive guidance on areas of potential risk within the real estate investment sector, including policies on gifts and hospitality, facilitation payments, political and charitable contributions, and the engagement of third parties.
- (e) **Record Keeping Requirements:** Detail the necessary documentation and record-keeping practices to ensure transparency and accountability.
- (f) **Responsibility and Oversight:** Assign specific roles and responsibilities to designated Associated Persons for the implementation and maintenance of these policies and procedures, including the establishment of internal controls and ongoing compliance monitoring.

Accolade's anti-bribery and anti-corruption policies and procedures are essential to the integrity and ethical conduct of our business operations. They serve as a testament to our dedication to lawful and ethical practices in all our dealings within the real estate investment industry.

3 CORE PRINCIPLES

- (a) **Promotion of Ethical Culture:** Accolade is dedicated to fostering a business environment that actively discourages bribery and corruption. We strive to promote and support ethical business practices across all levels of our organization.
- (b) **Integrity and Accountability:** All Associated Persons are expected to conduct themselves with honesty and integrity, ensuring that they are responsible stewards of Accolade's resources.

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- (c) **Risk Minimization:** We are committed to minimizing the risk of bribery and corruption through a robust internal control structure designed to prevent such unethical conduct.
- (d) **Accurate Record-Keeping:** Accolade maintains precise and fair books and records that accurately reflect all transactions and the management of assets, in compliance with relevant standards and regulations.
- (e) **Open and Honest Work Environment:** We maintain a work environment where open and honest discussions about potential violations of our policies are encouraged and supported.
- (f) **Prompt Reporting and Investigation:** Any instances of bribery, corruption, or suspected misconduct are to be reported promptly and will be subject to a thorough and effective investigation.
- (g) **Presumption of Innocence:** No Associated Person will be deemed to have engaged in bribery or corruption without conclusive evidence, established through a proper investigative process.
- (h) **Disciplinary Measures:** Accolade will take consistent and effective action against any individual found to have engaged in bribery or corruption.
- (i) **Policy Implementation:** This policy is to be effectively implemented and adhered to in all locations and jurisdictions where Accolade operates.
- (j) **Training and Awareness:** All Associated Persons are required to undergo training upon joining Accolade and at regular intervals thereafter. This training ensures awareness and strict adherence to our anti-bribery and anti-corruption policies and procedures.

Accolade is dedicated to upholding these principles and expects all Associated Persons to align with this policy as a condition of their association with Accolade. Through vigilance and a collective commitment to ethical conduct, we aim to preserve the integrity of our business operations and the trust of our clients, investors, and the communities in which we operate.

4 UNDERSTANDING BRIBERY AND CORRUPTION

4.1 Overview

Bribery and corruption are detrimental practices that can manifest in various forms, including but not limited to extortion, the misuse of influential positions for personal gain, embezzlement, securing unfair advantages through valuable offerings, and engaging in money laundering or related illicit activities.

Accolade operates in multiple jurisdictions, each with its own set of laws and regulations that may forbid corrupt practices such as bribery, kickbacks, illegal payments, and the provision or acceptance of improper benefits, which may include excessive gifts or hospitality.

Non-compliance with anti-corruption laws can lead to severe consequences for Accolade, any Associated Persons and any other involved individuals or third parties, including substantial fines, imprisonment, and significant reputational harm.

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4.2 Bribery Defined

Bribery is a critical concern under anti-corruption laws and encompasses actions such as:

- (a) The act of promising, offering, or delivering a bribe (active bribery).
- (b) The act of soliciting, consenting to receive, or accepting a bribe (passive bribery).
- (c) Abuse of influence in order to facilitate or commit active or passive bribery.
- (d) Authorizing any form of the aforementioned activities.

These actions may involve, but are not limited to:

- (a) Monetary gifts, equivalents, or loans.
- (b) Gifts and hospitality or entertainment.
- (c) Payment of services.
- (d) Favors, including job offers or internships.
- (e) Discounts or waivers on services.
- (f) Contributions to charities or political entities linked to an individual or their associates.

Such conduct is typically intended to serve as an incentive or reward for the improper execution or deliberate omission of a business-related function or activity, which is expected to be carried out with integrity.

The primary objective of bribery is often to secure or maintain a business advantage, such as winning new investment opportunities or enhancing existing partnerships.

Bribery can occur in numerous forms beyond the examples provided.

4.3 Zero Tolerance Policy

Associated Persons are unequivocally prohibited from engaging in any actions that involve making, promising, offering, soliciting, receiving, or authorizing any form of payment, gift, or advantage to or from any individual or entity, including government officials or public representatives, for unlawful purposes or in contravention of any anti-corruption law.

4.4 Interactions with government and public officials

Within the context of our policies, government or public officials are defined as:

- (a) Any individual serving as an officer or employee of a government, or any of its departments, agencies, or instrumentalities;
- (b) Persons acting officially for or on behalf of a government or governmental body, or who perform public duties;
- (c) Individuals in legislative, administrative, or judicial positions, regardless of how they attained their role;
- (d) Officials and staff members of entities owned or controlled by the government;
- (e) Members of political parties, political officeholders, or political candidates;
- (f) Officers, employees, or agents of public international organizations (e.g., the United Nations); or
- (g) Relatives or close associates of the aforementioned individuals, including members of royal families and honorary government officials.

4.5 Policy Details

Further specifics regarding Accolade's policy on matters such as gifts and hospitality, facilitation

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payments, political or charitable contributions, and interactions with third parties are elaborated in the subsequent sections.

5 GIFTS AND HOSPITALITY

5.1 General Principles for Gifts and Hospitality

Within the context of Accolade's real estate investment operations, gifts and hospitality may encompass the provision or acceptance of presents, meals, tokens of appreciation, or invitations to events, functions, or social gatherings that are related to Accolade's business activities.

It is imperative that all Associated Persons engage in the exchange of gifts or hospitality only when it is deemed reasonable, proportionate, suitable for the given situation and in accordance with this policy. Such exchanges should never be conducted with the intent to obtain an improper benefit or to influence a business decision. Hospitality should serve the legitimate purpose of fostering business relationships and facilitating professional discussions with clients or partners.

Gifts and hospitality extended or received by individuals closely associated with Associated Persons must also adhere to the standards set forth in this policy.

Associated Persons are prohibited from offering, promising, authorizing, soliciting, or accepting any form of gift or hospitality that:

- (a) Surpasses the normal bounds of ethical business courtesies or is otherwise inappropriate;
- (b) Lacks a legitimate business rationale;
- (c) Aims to obtain any form of personal or business advantage, or is intended to influence the actions of a government or public official, or signifies a reward for improper performance;
- (d) Is associated with a procurement decision involving Accolade;
- (e) Violates the policies of a client or a third-party recipient's organization; or
- (f) Fails to comply with applicable laws and regulations governing real estate.

Should additional rules or thresholds regarding gifts and hospitality exist within specific departments or teams at Accolade, Associated Persons are required to comply with these as well. In cases of uncertainty regarding such rules, Associated Persons should seek clarification from the legal department.

5.2 Practical Guidance for Gifts and Hospitality

The application of common sense is essential when considering the appropriateness of gifts or hospitality. Examples of generally acceptable gifts and hospitality include:

- (a) Occasional modest meals with business associates;
- (b) Gifts of nominal value, such as branded stationery, coffee cards with limited credit, or small promotional items;
- (c) Traditional or seasonal gifts of modest value, such as flowers or fruit baskets, provided they do not exceed a certain threshold (e.g., CZK 1,200, EUR 50 or the equivalent in another currency);
- (d) Gifts intended to commemorate a business transaction;
- (e) Participation in local cultural or sports events without extravagant travel arrangements;
- (f) Attendance at standard seasonal or festive gatherings.

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5.3 Evaluating the Acceptability of Gifts and Hospitality

When assessing the appropriateness of gifts or hospitality, consider the following questions:

- (a) Is the recipient a government or public official?
- (b) Could the gift or hospitality be perceived as lavish or excessive?
- (c) Is the gift or hospitality unusual in the context of industry standards?
- (d) Does the gift or hospitality extend to family members or individuals outside the normal business relationship?
- (e) Is the gift or hospitality intended as an inducement or reward for business dealings?
- (f) Is there ongoing or upcoming business being pitched or tendered at the time of the offer?
- (g) Are there any discounted services or rates being presented as a gift or inducement?
- (h) Would public disclosure of the gift or hospitality potentially damage Accolade's reputation?

If the answer to any of these questions is affirmative, the risk of bribery increases, and the gift or hospitality should be carefully scrutinized within the framework of this policy. The legal department should be consulted if there is any doubt.

5.4 Unacceptable Gifts and Hospitality

Certain situations will always be deemed unacceptable, including but not limited to:

- (a) Cash gifts or cash-equivalent vouchers, except for nominal amounts as previously described;
- (b) Entertainment of a sexual nature or similarly inappropriate activities;
- (c) Payment or reimbursement of travel expenses for government or public officials, barring pre-approved exceptions with strict limitations;
- (d) Gifts and entertainment for close relatives of government or public officials;
- (e) Gifts or hospitality provided at private residences;
- (f) Any form of "quid pro quo" arrangement.

5.5 Receiving Gifts from Clients

Associated Persons may accept non-monetary gifts from clients under the following conditions:

- (a) There is no conflict of interest or undue advantage taken;
- (b) Gifts are reported to the Associated Persons's supervisor or the relationship partner;
- (c) Higher value gifts or those from private clients, including bequests, must be reported to the legal department;
- (d) Hospitality may be considered a gift under certain circumstances and should be reported accordingly;
- (e) Any doubts regarding the acceptance of a gift should be directed to the legal department.

5.6 Employment Offers and Internships

The same level of judgment applied to gifts and hospitality must be exercised when considering offers or requests for employment, internships, or work experience. All such arrangements must comply with Accolade's policies and legal advice should be sought if there is any uncertainty.

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5.7 Record Keeping

All gifts and hospitality must be accurately and transparently recorded and maintained in Accolade's records management system.

6 FACILITATIONS OF PAYMENTS

6.1 Definition and Context

Facilitation payments, also known as "grease payments", are typically small sums of money or gifts given to public officials with the intent to expedite or ensure the performance of a routine action that the official is already bound to perform. These actions can include, but are not limited to:

- (a) Issuance of permits, licenses, or other documents necessary for conducting business within a particular jurisdiction.
- (b) Processing of governmental documents such as visas and work orders.
- (c) Provision of services by police, postal services, or inspection bodies related to contract performance or logistics.
- (d) Connection to utilities such as telephone, electricity, or water supply.
- (e) Any other similar routine governmental action.

6.2 Policy Statement

Accolade is committed to conducting its business ethically and in compliance with all applicable laws and regulations. In line with this commitment, Accolade strictly prohibits the offering, promising, giving, or authorizing of facilitation payments, regardless of their size or frequency.

6.3 Rationale for Prohibition

The prohibition of facilitation payments is based on the following considerations:

- (a) Such payments may be considered bribes and can be considered illegal, potentially exposing Accolade to legal risks.
- (b) Even if perceived as harmless or customary in certain locales, facilitation payments undermine the integrity of business operations and conflict with Accolade's commitment to ethical practices.
- (c) In instances where facilitation payments are solicited, Accolade personnel and associated third parties are required to firmly decline such requests. Further steps should include seeking verification of the request through higher channels within the requesting entity.

6.4 Exceptions

It is important to distinguish between illegal facilitation payments and legally mandated fees, which may include administrative or expedited service fees. Such fees are permissible when they are stipulated by law and not merely by local custom or practice. These fees must be transparent, official, and receipted as part of a standard legal process.

In summary, Accolade's stance on facilitation payments is clear and unequivocal: no such payments shall be made or authorized by any personnel or associated parties. This policy reflects Accolade's unwavering dedication to lawful and ethical business conduct, which is

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foundational to Accolade's reputation and success in the real estate investment sector.

7 POLITICAL OR CHARITABLE CONTRIBUTIONS AND SPONSORSHIPS

7.1 Political Contributions

Associated Persons are strictly prohibited from making any political donations to any political party, candidate, or public international organization on behalf of Accolade or its clients, either directly or indirectly, without obtaining prior written consent from the legal department.

7.2 Interactions with government entities and public officials

Associated Persons must exercise heightened diligence when engaging with government entities and public officials. Conduct that may be acceptable in the private sector could be deemed inappropriate or unlawful in the context of government interactions. It is imperative to adhere to the highest standards of integrity and compliance with all applicable laws and regulations when dealing with government officials or entities.

7.3 Charitable Contributions and Sponsorships

Charitable contributions and sponsorships are recognized as legitimate activities provided they are made with genuine charitable intent and not as a means to conceal bribes or influence business decisions.

To safeguard against the misuse of charitable contributions and sponsorships and to prevent any misinterpretation of such activities as bribery, Associated Persons must adhere to the following guidelines when making contributions or sponsorships on behalf of Accolade:

- (a) **Direct Payments:** Contributions or sponsorships must be paid directly to the charitable organization and not to individuals or alternate entities.
- (b) **Prohibition of Improper Influence:** No contribution or sponsorship should be offered or made as an inducement or reward for securing or maintaining business, as a substitute for political contributions, or for any other improper purpose.
- (c) **Conflict of Interest:** Vigilance is required to prevent any conflict of interest in relation to charitable giving or sponsorships. In cases of uncertainty, consultation with the legal department is mandatory.
- (d) **Accurate Record-Keeping:** All contributions and sponsorships must be accurately and transparently recorded in Accolade's financial records, ensuring compliance with applicable accounting standards and regulations.

Accolade is committed to operating with integrity and in compliance with all applicable laws and regulations governing political and charitable activities. This policy serves as a guide to uphold ethical standards and avoid any actions that could be construed as corrupt or in violation of anti-bribery and anti-corruption laws.

8 ENGAGEMENT WITH THIRD PARTIES

8.1 Definition of a third party

Accolade is committed to engaging only with third parties who demonstrate a strong

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commitment to anti-bribery and anti-corruption standards, adhering to all relevant laws and regulations. Third parties encompass a broad spectrum of external individuals and entities that may act for or in any capacity on behalf of Accolade in the execution of its business activities ("**Third Parties**").

Third Parties include:

- (a) Real estate brokers and agents
- (b) Sales and marketing representatives
- (c) External consultants, including legal and financial advisors
- (d) Due diligence and research firms
- (e) Strategic partners, including joint venture entities
- (f) Service providers, such as property management companies, construction firms, and architects
- (g) Suppliers and vendors for various services and goods
- (h) Contractors and subcontractors involved in development projects
- (i) Any other service providers or consultants acting on behalf of Accolade

The expertise and local insights provided by the Third Parties are invaluable. Nonetheless, to mitigate the risk of bribery and corruption, it is imperative that these parties are informed of, and where applicable, comply with this policy. These guidelines are designed to ensure that Accolade does not engage with any Third Party involved in corrupt activities and to confirm that all third parties are in full compliance with relevant anti-corruption laws.

8.2 Criteria for engaging third parties

No third party shall be engaged or authorized to act on behalf of Accolade without adhering to the established protocols for evaluation, selection, and engagement as outlined herein.

Remuneration to Third Parties must be justifiable and proportionate to the services provided. Payments should be made through traceable means such as electronic transfers. All transactions must be supported by detailed invoices or receipts.

The engagement of Third Parties is contingent upon satisfactory due diligence, which must be documented. This due diligence should be commensurate with the potential risk of corruption, especially if the Third Party will interact with government or public officials. Due diligence may include checks on ownership, background, financial health, and any affiliations with government or public officials.

For instance, if the risk is deemed low, it may suffice to verify the Third Party's reputation and trustworthiness through inquiries with business networks or online research. Conversely, higher risk scenarios may necessitate more extensive background information and possibly the engagement of specialized due diligence services. All due diligence findings should be properly recorded and maintained in Accolade's records management system.

8.3 Indicators of Potential Risk (Red Flags)

Any concerns or irregularities identified during the due diligence process must be thoroughly investigated and resolved prior to engagement. Accolade personnel should be vigilant for any signs of corruption risk, known as "red flags", which may include, but are not limited to:

- (a) Unusual payment patterns or financial arrangements;
- (b) Lack of clarity regarding the services provided by the Third Party;
- (c) Requests for excessive commissions or fees;

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- (d) Opacity in expense and accounting records;
- (e) Insufficient qualifications or capabilities of the Third Party;
- (f) Proposals involving gifts or entertainment for government officials or clients;
- (g) Known or suspected reputation for corruption;
- (h) Connections with government officials or their relatives;
- (i) Claims of influence based on personal connections rather than merit;
- (j) Newly established companies with no business history;
- (k) Ambiguous ownership structures;
- (l) Lack of a physical office or established place of business;
- (m) Demands for payment to third parties, in cash, or to offshore accounts;
- (n) Late changes to fee arrangements;
- (o) Unwillingness to provide requested due diligence information; or
- (p) Overreliance on government contacts to secure business.

Post-engagement, Accolade will continue to monitor the Third Party's activities to ensure compliance with anti-corruption laws and Accolade's policies. Any concerns should be promptly addressed with the appropriate internal department.

8.4 Contractual Provisions

Contracts with Third Parties should include clauses that ensure adherence to anti-corruption laws. These clauses should affirm the Third Party's understanding of such laws, their commitment to compliance, and their obligation to maintain accurate records. Accolade must have the right to inspect these records and the Third Party must not subcontract or assign their duties without Accolade's written consent.

9 RECORD KEEPING

9.1 Comprehensive Documentation

Accolade's commitment to integrity and transparency in all its business dealings is reflected in the meticulous maintenance of its financial records. It is imperative that the records of Accolade accurately and completely reflect all business transactions and expenses. This is not only crucial for financial audits but also serves as a safeguard against the facilitation of unauthorized payments. The term 'records' encompasses all forms of documentation related to Accolade's operations, including but not limited to electronic and paper records, documents for payment approvals, supporting documents for payment requests, payment authorizations, classification of payments according to accounting standards, and records of entertainment and hospitality expenses.

9.2 Accuracy and Transparency

Associated Persons are responsible for ensuring that every financial transaction and expenditure is documented in a manner that is both comprehensive and precise. The records must be clear and transparent, providing unequivocal details of the payments made, including the payee, the purpose of the payment, the accounts involved, and the timing of the transaction. The creation of records that are false or misleading is strictly forbidden.

9.3 Prohibition of Undisclosed Transactions

Under no circumstances are Associated Persons permitted to make payments to recipients who are not fully disclosed. The existence of any undisclosed or unrecorded funds, such as "off the books" accounts, is expressly prohibited.

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9.4 Payment Approval Process

When Associated Persons seek approval for a payment, they must provide sufficient supporting documentation to facilitate the authorization of the payment. This process ensures that all payments are made in accordance with Accolade policies and regulatory requirements.

9.5 Cooperation with Audits

All Associated Persons are required to cooperate fully with both internal and external audit inquiries. It is expected that Associated Persons respond honestly and provide complete information when questioned about financial records or business transactions.

Accolade's record-keeping policies are designed to uphold the highest standards of ethical conduct and to ensure compliance with all applicable anti-bribery and anti-corruption laws. Accolade's reputation for integrity is built on the foundation of accurate and transparent record management.

10 RESPONSIBILITIES

10.1 At Accolade, we are committed to conducting our operations with integrity and in compliance with the laws and regulations that govern our industry. This commitment extends to actively preventing and addressing any instances of bribery and corruption. The framework for our anti-bribery and anti-corruption efforts is overseen by the legal department. This framework includes a comprehensive system of controls tailored to mitigate the risks of bribery and corruption that Accolade may encounter. While the system is designed to manage a broad spectrum of risks, it is the collective responsibility of all Associated Persons to uphold and enforce our anti-bribery and anti-corruption standards as detailed below.

10.2 Overall Responsibility

The Board has designated the responsibility for managing bribery and corruption risks to the legal department. Their responsibilities encompass the following:

- (a) Developing a risk profile for bribery and corruption and conducting regular assessments to ensure it remains current and reflective of our business objectives.
- (b) Establishing and maintaining robust policies and procedures that are proportionate to the identified bribery and corruption risks.
- (c) Designing and implementing an effective control environment to prevent bribery and corruption, aligned with the risk profile.
- (d) Applying appropriate pre-employment screening measures to mitigate risk.
- (e) Establishing mechanisms for:
 - (i) Reporting bribery and corruption risks.
 - (ii) Coordinating assurances on the effectiveness of policies and procedures to support internal control statements.
- (f) Ensuring Associated Persons are informed of these policies and procedures and understand their individual responsibilities in combating bribery and corruption.
- (g) Providing necessary training on bribery and corruption awareness and, where required, more targeted training for relevant employees.
- (h) Conducting thorough investigations into any actual, attempted, or suspected instances of bribery or corruption.
- (i) Pursuing legal and/or disciplinary action against those involved in bribery or corruption, including supervisors who fail in their oversight responsibilities.
- (j) Taking appropriate measures to recover assets and losses resulting from bribery or corruption.

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- (k) Implementing actions to minimize the risk of future bribery or corruption incidents.

10.3 Management

Department heads and managers are tasked with ensuring that effective internal controls are in place and operational within their areas of responsibility. Their duties include:

- (a) Identifying bribery and corruption risks.
- (b) Assessing each risk for likelihood and impact.
- (c) Identifying and ensuring compliance with effective controls.
- (d) Regularly reviewing and testing control systems.
- (e) Reassessing risks following new system implementations or changes to existing systems.
- (f) Reviewing controls and implementing new ones as necessary after bribery or corruption incidents.
- (g) Regularly quantifying bribery and corruption occurrences.
- (h) Developing strategies to prevent the recurrence of bribery and corruption.

Additionally, managers should ensure:

- (a) Separation of duties in departments with significant financial authority or purchasing power.
- (b) Consideration of anti-bribery and corruption safeguards in the design of new systems.

10.4 Associated Persons

All Associated Persons are expected to maintain high standards of personal and professional integrity. Responsibilities include:

- (a) Adhering to anti-bribery and corruption policies and procedures.
- (b) Using Accolade resources and handling funds with propriety.
- (c) Being vigilant to indicators of bribery or corruption and reporting any suspicions or unusual activities.
- (d) Complying with established systems and procedures, including expense claims and leave records.

11 CONTROLS AND REPORTING

11.1 Commitment to Ethical Business Practices

Accolade is dedicated to maintaining the highest standards of integrity and corporate governance. We are steadfast in our commitment to conducting business ethically and transparently, fostering a culture that promotes integrity and deters bribery and corruption. To this end, Accolade has instituted robust internal business and financial controls designed to reinforce our ethical standards and prevent corrupt practices.

11.2 Training

We recognize the importance of continuous education and risk assessment, and therefore, we conduct regular awareness training and risk evaluation to ensure our policies are understood and effectively implemented across the organization.

11.3 Reporting and Response

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Accolade encourages transparency and vigilance among all Associated Persons. Any incidents or suspicions of bribery or corruption must be promptly reported to the legal department. These reports will be addressed in accordance with this policy, ensuring a thorough and appropriate response to any such allegations.

11.4 Management and Remediation

If a breach is identified, Accolade's management is committed to taking decisive action to redress the issue and prevent recurrence. This may involve a review and overhaul of existing systems and procedures to strengthen our internal controls.

11.5 External Reporting Obligations

While Accolade operates primarily within the real estate sector, it is essential that we comply with all relevant regulatory requirements. Associated Persons must be aware of and adhere to any external reporting obligations that may arise under industry-specific regulations. Should there be a need to report an issue externally, Associated Persons are advised to consult with the legal department to ensure that Accolade's actions are in full compliance with regulatory standards and obligations.

In summary, Accolade's approach to anti-bribery and anti-corruption is embedded in our corporate ethos and is reflected in our comprehensive controls and reporting mechanisms. We are committed to upholding our reputation as a trustworthy and ethical leader in the real estate investment industry.

12 CONCLUSION

12.1 Commitment to Integrity

Accolade recognizes that the nature and details of bribery and corruption can differ significantly in each instance. We, at Accolade, hold a zero-tolerance stance towards all forms of bribery and corruption. This commitment extends to the thorough and swift investigation of any actual, suspected, or attempted acts of bribery or corruption. It is imperative that our leadership, including executives and senior management, remain vigilant and proactive in safeguarding Accolade's reputation, the interests of our stakeholders, and Accolade's assets. Upholding integrity is not just a policy but a core value that is integral to the way we conduct our business. Our leaders are entrusted with the responsibility to prevent any breach of ethical conduct and to ensure that all business dealings are transparent and fair.

12.2 Guidance and Oversight

Should there be any questions or need for clarification regarding this policy, these should be promptly directed to the legal department. This department is tasked with the oversight of regulatory matters and ensuring that Accolade adheres to the highest standards of ethical conduct. They serve as a resource for all Associated Persons, providing guidance on the appropriate course of action in complex situations and ensuring that our commitment to ethical practices is upheld across all levels of the organization.

Accolade is dedicated to maintaining the highest standards of ethical conduct and compliance with all applicable laws and regulations. Our policies are designed to support a culture of honesty, integrity, and accountability, ensuring that we continue to earn the trust of our clients, partners, and the communities in which we operate.

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13 FINAL PROVISIONS

- 13.1 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.
- 13.2 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.
- 13.3 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.