

SUSTAINABLE PROCUREMENT CHARTER

GOODS AND SERVICES SUPPLIERS

BNP Paribas Real Estate's "Inspire Real Estate 2020" Corporate Social Responsibility (CSR) vision is to satisfy its clients, partners, and Suppliers with responsible real estate products and services that create shared value and contribute alongside them to the development of sustainable cities.

BNP Paribas Real Estate has defined 12 commitments based around 4 pillars:

- 1. Economic responsibility:** Build innovative product and service offerings with our customers and partners in an ethical and responsible manner.
- 2. Environmental responsibility:** Reduce the environmental impact of our activities, and make environmental quality a driver of tangible and intangible performance.
- 3. Social responsibility:** Encourage the development and dedication of our employees.
- 4. Civic responsibility:** Be an engaged player in the real estate sector and support local initiatives.

BNP Paribas Real Estate has implemented a Sustainable Procurement Charter. The ability of Suppliers to implement these commitments through appropriate practices is one of the evaluation criteria used by BNP Paribas Real Estate throughout their relationship with their Suppliers. By adhering to this Charter, the Supplier undertakes, on behalf of themselves and any subcontractors, to implement the necessary means to ensure compliance with the principles set out below.

In the event of a breach of this Charter by one of its Suppliers, BNP PARIBAS REAL ESTATE reserves the right to review and, if necessary, terminate the commercial relationship in accordance with the provisions of the applicable law, even in the absence of a written agreement formalising this relationship, without prejudice to BNP PARIBAS REAL ESTATE's other rights or recourse that they may be entitled to exercise. Where national legislation or other applicable regulations and this Charter cover the same subject matter, the highest standards or the most stringent provisions shall apply. When this Charter conflicts with the legislation in force, the latter takes precedence over the Charter.

The reference to BNP Paribas Real Estate in this Charter refers to all companies controlled by BNP Paribas Real Estate, following the Article L. 233-3 of the French Commercial Code.

The reciprocal commitments set out below are based in particular on the fundamental principles of the United Nations Global Pact, to which BNP Paribas Real Estate, as a subsidiary of BNP Paribas, has adhered, in the field of human rights, working conditions, the environment and the fight against corruption, and on the United Nations Guidelines on Business and Human Rights, which specify how companies should comply with their human rights commitments.



BNP PARIBAS REAL ESTATE'S CONTRIBUTION TO THE SUSTAINABLE DEVELOPMENT GOALS

In 2015, the United Nations adopted seventeen Sustainable Development Goals (SDGs). This is a global call to eradicate poverty, inequality and injustice, protect the planet and ensure that human beings live in peace and prosperity by 2030.

To define its actual or potential contribution to this challenge, BNP Paribas Real Estate analysed the link between the SDGs and its CSR commitments set out in "Inspire Real Estate 2020". At the end of this analysis, the objectives chosen by BNP Paribas Real Estate were classified according to 2 levels of priority:

STRATEGIC SUSTAINABLE DEVELOPMENT OBJECTIVES INTEGRATED INTO CURRENT AND FUTURE SERVICES



RELEVANT SUSTAINABLE DEVELOPMENT OBJECTIVES ADDRESSED BY THE "INSPIRE REAL ESTATE 2020" STRATEGY



BNP PARIBAS REAL ESTATE'S COMMITMENTS TO ITS SUPPLIERS

I. ESTABLISH TRUSTING RELATIONSHIPS BETWEEN THE PARTIES TO SAFEGUARD THE INTERESTS OF EACH STAKEHOLDER

A balanced relationship allows us to protect not only our own interests but also those of our Suppliers, by limiting the risk of mutual dependence. As a result:

- BNP Paribas Real Estate reiterates its obligation to pay its Suppliers in accordance with the law in force in each country where it operates;
- BNP Paribas Real Estate undertakes to be vigilant with regard to the risk of mutual dependence with its Suppliers and to put in place control measures to detect, monitor and minimise this risk;
- BNP Paribas Real Estate is committed to establishing a long-term relationship of trust with its Suppliers, in particular by respecting the strict confidentiality of non-public information communicated to them and the intellectual property rights of its Suppliers, in compliance with applicable laws;
- BNP Paribas Real Estate undertakes to comply with its policies, procedures and applicable internal controls regarding Suppliers;
- BNP Paribas Real Estate undertakes to respect a fair selection process for its Suppliers, by establishing conditions for fair competition and fair treatment of its Suppliers in the selection procedures;
- BNP Paribas Real Estate undertakes to fight against all forms of corruption, active or passive, and to avoid any situation that may present a conflict of interest by complying with its rules of professional ethics;
- BNP Paribas Real Estate belongs to the BNP Paribas Group. As a subsidiary of a banking institution, the company is committed to the fight against money laundering and the financing of terrorism.

II. IMPLEMENTATION OF RESPONSIBLE SOCIAL PRACTICES

- BNP Paribas Real Estate is committed to choosing Supplier partners who share its values and commitments in terms of social responsibility;
- BNP Paribas Real Estate is committed to making its Suppliers contributors to its responsible development policy;
- BNP Paribas Real Estate is committed to promoting diversity in its recruitment and asks its economic partners, including its Suppliers and Service Providers, to guarantee non-discrimination in the search for their future employees;
- BNP Paribas Real Estate undertakes to offer Suppliers the use of mediation to facilitate the amicable settlement of any disputes arising during the execution of the contract.

SUPPLIER COMMITMENTS TO BNP PARIBAS REAL ESTATE

I HUMAN RIGHTS AND LABOUR LAW

The Supplier guarantees to BNP Paribas Real Estate that it complies with social regulations in all the countries in which it operates.

BNP Paribas Real Estate requires Suppliers to commit to the United Nations Guidelines for Business and Human Rights. These Principles clarify the procedures for compliance, regardless of the countries in which Suppliers operate, with the principles of the Universal Declaration of Human Rights (enacted by the United Nations in 1948) and the International Labour Organization Conventions (ILO) referred to in the appendices, and in particular:

- The prohibiting the use of forced, hidden or compulsory labour and the ill-treatment of their employees. This includes the banning of all practices of modern slavery and human trafficking (with particular reference to the Modern Slavery Act UK);
- The prohibiting of child labour;
- No discrimination: no distinction, exclusion or preference should be made on the basis of colour, sex, age, language, religion, sexual orientation or gender identity, national or social origin, opinion or disability;
- Respect for health and safety by guaranteeing healthy, safe and dignified working conditions and work environment for its own staff;
- The provision of a decent salary and work time by paying a minimum wage that meets basic needs and complies with the regulations of the countries where they work, in terms of working hours and rest periods;
- Respect for freedom of expression, freedom of association and the right to collective negotiation.

II. BUSINESS ETHICS AND PROFESSIONAL CONDUCT

- Each Supplier undertakes to read the Code of Conduct applied to BNP Paribas Real Estate, which formalises the Group's main ethical principles and is available by following this link: https://group.bnpparibas/uploads/file/codeofconduct_en_11_01_2018_40p.pdf
- Each Supplier undertakes not to initiate or participate in an agreement through a call for tenders, in order to ensure fair competition and a fair selection process for Suppliers, including the ban on all forms of anti-competitive practices (illegal agreements, abuse of a dominant position that may prevent, restrict or distort competition).

COMPLIANCE WITH THE LAW:

- Each Supplier must ensure compliance with current legislation. They must refrain from any activity or behaviour that could lead BNP Paribas Real Estate, one of its subsidiaries or one of its employees, directly or indirectly, into an illegal practice and damage BNP Paribas Real Estate's image. In particular, they shall refrain from any act of counterfeiting.

THE REJECTION OF ANY ACT OF CORRUPTION:

- Each Supplier must comply with all legal and regulatory provisions to prevent and fight corruption and undertake to strictly comply with these rules;
- Any direct or indirect remuneration of BNP Paribas Real Estate employees involved in the procurement relationship, at any level whatsoever, or having the power to influence the procurement decision, is strictly prohibited, regardless of their purpose and form;
- Each Supplier shall refrain from attempting to obtain any of BNP Paribas Real Estate's contracts through unfair or corrupt practices;

- Any initiative to the contrary by a Supplier towards a member of BNP Paribas Real Estate staff is unacceptable and forbidden;
- In particular, each Supplier shall strictly refrain from offering any gift, donation, benefit in kind or cash, or invitation that does not comply with BNP Paribas Real Estate's internal rules;
- Each Supplier undertakes to respect the principle that any invitation should only be used to enable BNP Paribas Real Estate to acquire a better knowledge of its products or services. In this spirit, it is strictly forbidden to offer BNP Paribas Real Estate employees, or family members of employees, invitations to leisure activities or invitations to events that include a significant proportion of leisure activities;
- In the event that a Supplier acts as an adviser or intermediary between BNP Paribas Real Estate and a final Supplier, it undertakes not to accept any financial or in-kind remuneration from the final Supplier in connection with the assignment entrusted to it, without the agreement of BNP Paribas Real Estate.

CONFLICTS OF INTEREST:

- Each Supplier undertakes to declare any direct or indirect relationship between him and an employee of BNP Paribas Real Estate in order to avoid any conflict of interest situation;
- Similarly, when a Supplier is confronted with a potential or obvious conflict of interest, whatever its nature and origin, they must inform BNP Paribas Real Estate. The supplier undertakes to seek in good faith with BNP Paribas Real Estate a solution to manage or even put an end to the conflict of interest situation.

LOYALTY AND CONFIDENTIALITY:

- BNP Paribas Real Estate expects its Suppliers to act loyally towards them in all aspects of their relationships;
- In particular, any information relating to the business relationship between the Supplier and BNP Paribas Real Estate may only be used within the strict framework of that relationship, and may under no circumstances be disclosed to third parties without BNP Paribas Real Estate's prior written consent.

WHISTLE-BLOWING:

Each Supplier undertakes to inform BNP Paribas Real Estate as soon as possible of any breach of business ethics or environmental and social regulations, within the company or with one of their subcontractors, that may damage BNP Paribas Real Estate's reputation or that of the Supplier.

III. AUDIT AND MONITORING OF THE CHARTER'S IMPLEMENTATION

- BNP Paribas Real Estate reserves the right to conduct an audit of all the practices of the Suppliers who have signed this Charter;
- Failure to comply with these rules could have consequences on the continuation of the contractual relationship with Suppliers and in terms of referencing;
- More generally, BNP Paribas Real Estate expects Suppliers to commit to implementing progress plans with regard to their social and environmental practices and to provide BNP Paribas Real Estate with them;
- BNP Paribas Real Estate expects Suppliers to commit to providing supporting documents for the application of the principles set out above and to receive auditors (internal and external) appointed by BNP Paribas Real Estate to verify the implementation of the Charter.

IV. SUBCONTRACTING

BNP Paribas Real Estate expects Suppliers to commit to:

- Implement a monitoring process to prevent and manage any risks with an environmental and/or social impact throughout their supply chain;
- Promote and apply the principles of the Charter to their Suppliers and subcontractors.

V. RESPECT FOR THE ENVIRONMENT

Each Supplier undertakes to comply with BNP Paribas Real Estate's "Inspire Real Estate 2020" global sustainable development / CSR approach. BNP Paribas Real Estate requires its Suppliers to comply with local and international environmental regulations and standards, to obtain the required environmental permits and to be able to demonstrate the effective implementation of the requirements listed in this Charter.

Each Supplier undertakes to reduce its environmental impact in a sustainable manner and to implement green initiatives that contribute to BNP Paribas Real Estate's sustainable development actions by developing:

- Knowledge of its subcontractors;
- Environmental impact control;
- The certification or labelling of its products or services;
- Controls on the reduction of its consumption in terms of resources (water, energy, etc.) and waste production;
- An environmental management system (EMS).

Each Supplier also undertakes to comply with all environmental regulations in force in the country where it operates, applicable to the nature of its activity.

VI. PROTECTION OF PERSONAL DATA

- Each Supplier undertakes to comply with EU Regulation 2016/679 - General Data Protection Regulations (GDPS) and all applicable related laws and regulations of the Member States of the European Economic Area (EEA).
- When the Supplier is a "Subcontractor" in the context of the processing of personal data carried out on behalf of and under the documented instructions of BNP Paribas Real Estate, they undertake to:
 - Cooperate spontaneously with BNP Paribas Real Estate in order to enable it to comply with all the obligations provided for by the regulations applicable to the processing of personal data;
 - Comply with all obligations under section 28 of the GDPS;
 - Provide BNP Paribas Real Estate with sufficient guarantees as to the implementation of appropriate technical and organisational measures, and guarantee the protection of the rights of the person concerned;
 - To not transfer BNP Paribas Real Estate data outside the EEA without the prior consent of BNP Paribas Real Estate;
 - Immediately inform BNP Paribas Real Estate if, in its opinion, an instruction from BNP Paribas Real Estate constitutes a breach of data protection rules;
 - Make every effort to help BNP Paribas Real Estate comply with the requests of people exercising their rights (access, rectification, removal, transfer, objection, etc.).
- If necessary, assist BNP Paribas Real Estate in carrying out the impact assessment of the processing operations under consideration, and provide them with all the necessary information;
- Notify BNP Paribas Real Estate of any violation of personal data as soon as possible after becoming aware of it;
- Provide BNP Paribas Real Estate with all the necessary information to demonstrate compliance with its obligations and to allow audits to be carried out.

SERVICE PROVIDER SIGNATURE

SURNAME:

.....

NAME:

.....

POSITION:

.....

DATE:

.....

**SIGNATURE OF THE EXECUTIVE DIRECTOR
OR OTHER REPRESENTATIVE DULY
AUTHORISED TO SIGN BY THE EXECUTIVE
DIRECTOR:**

BNP PARIBAS REAL ESTATE SIGNATURE

SURNAME:

.....

NAME:

.....

POSITION:

.....

DATE :

.....

**SIGNATURE OF THE EXECUTIVE DIRECTOR
OR OTHER REPRESENTATIVE DULY
AUTHORISED TO SIGN BY THE EXECUTIVE
DIRECTOR:**

REFERENCE TEXTS

THE 10 PRINCIPLES OF THE GLOBAL PACT:

Human Rights:

1. Companies are invited to promote and respect the protection of international human rights law within their sphere of influence; and
2. Ensure that their own companies are not complicit in human rights violations.

Labour Law:

3. Companies are encouraged to respect freedom of association and to recognise the right to collective bargaining;
4. The elimination of all forms of forced or compulsory labour;
5. The effective abolition of child labour; and
6. The elimination of discrimination in employment and occupation.

Environment:

7. Companies are encouraged to apply a precautionary approach to environmental issues;
8. To undertake initiatives to promote greater environmental responsibility; and
9. To promote the development and spread of environmentally friendly technologies.

Fight against corruption:

10. Companies are encouraged to take action against corruption in all its forms, including extortion and bribery.

THE 30 ARTICLES OF THE UNIVERSAL DECLARATION OF HUMAN RIGHTS:

<http://www.un.org/fr/documents/udhr/>

GUIDING PRINCIPLES FOR BUSINESS AND HUMAN RIGHTS:

http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_FR.pdf

THE FUNDAMENTAL CONVENTIONS OF THE INTERNATIONAL LABOUR ORGANIZATION (ILO), IN PARTICULAR:

- Convention n°29 on forced labour.
- Convention n°87 on freedom of association and protection of the right to organise.
- Convention n°98 on the right to organise and collective bargaining.
- Convention n°100 on equal pay.
- Convention n°105 on the abolition of forced labour.
- Convention n°111 on discrimination (employment and occupation).
- Convention n°138 on the minimum age for employment.
- Convention n°155 on workers' health and safety.
- Convention n°182 on the worst forms of child labour.

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC on data protection.

Law n° 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life.

Law n° 2017-399 of 27 March 2017 relating to the duty of vigilance of parent companies and contracting companies.

Act No. 78-17 of 6 January 1978, as amended, on data processing, files and freedoms, as well as all applicable related laws and regulations of the Member States of the European Economic Area (EEA).