



Supplier Code of Conduct

SIRIN.EU

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Who We Are

SIRIN DEVELOPMENT Group (hereinafter – the Group, **Sirin Development**) is one of the largest logistics real estate developers in the Baltic States. We have been successfully operating in the market for more than 15 years and have developed more than 600,000 sqm of modern, energy-efficient and sustainable logistics parks. Today, Sirin Development manages more than a third of a million sqm of logistics real estate in the Baltics.

With unparalleled expertise, professionalism, and experience, we develop sustainable, energy-efficient logistics parks. We develop them in prime locations, utilizing modern and innovative solutions. That's why we approach every detail with intelligence

and care. We carefully select the ideal location and land plot for logistics property development, while planning the design and construction processes with precision and attention to every detail." Our team of experts ensures smooth, efficient, and modern logistics park development at every stage – from implementing innovative solutions and utilizing green energy to prioritizing employee well-being and delivering professional real estate property management.



Our Mission

No. 1 logistics real estate developer in the Baltics.

Our Values

Our values are more than just words on a poster or lines in a textbook; they are the guiding principles behind every decision we make and every action we take. They reflect who we are, what we stand for, and the direction we are heading as a united force.



GROWTH

To foster both personal and organizational development.



AGILITY

To be the fastest and the market leader.



ALIGNMENT

We work for the common results.

The Group's Supplier Code of Conduct reflects Sirin Development Group's ambition to strengthen sustainable cooperation with Suppliers by promoting legal, professional and fair business practices that incorporate environmental, social responsibility and business ethics objectives. This Sirin Development Group Supplier Code of Conduct sets out the minimum standards of business conduct we expect all our Suppliers to uphold and, whenever possible, to exceed. We also expect the Supplier to encourage its Sub-supplier to adhere to the principles outlined below.

Environmental Protection

The Supplier must comply with all mandatory environmental requirements as defined in the applicable legislation. Therefore, the Suppliers of Sirin Development must adhere to the principles outlined below, which play a key role in implementing sustainable solutions within the supply chain and in achieving our shared goals of reducing the impact of climate change.

01 Suppliers shall aim to minimise negative environmental impacts. The Supplier shall, where possible, apply environmental management system standards such as LST EN ISO 14001 or the European Union's Environmental Management and Audit Scheme (EMAS), or other similar environmental management systems based on EU or international standards. Alternatively, the Supplier shall have an effective environmental policy or program in place to address environmental issues and minimize negative impacts.

02 Suppliers shall aim to assess the impact of their activities on climate change and take action to reduce it.

03 Suppliers shall aim to incorporate energy efficiency, environmental friendliness and recycling aspects into the design of buildings, including the management of product packaging.

05 Suppliers shall aim to reduce the amount of waste generated by their activities, ensure safe and responsible management, and promote reuse and recycling.

04 Suppliers shall aim to develop and use environmentally friendly technologies and services.

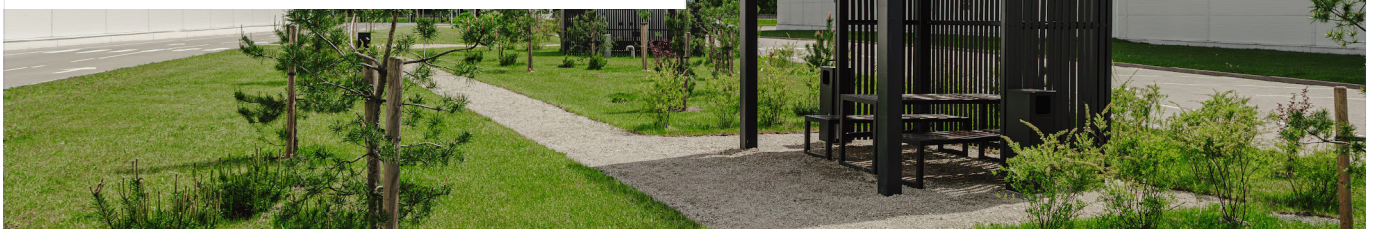
06 Suppliers shall be actively committed to conserving natural resources and contributing to the European Union's circular economy objectives at all stages of the life cycle of the development, production, supply, provision of services or performance of works.

07 Suppliers shall use fewer or no hazardous chemicals in the production of goods, services, or works, ensuring they do not pose a risk to human health and actively seeking to avoid environmental harm.

Sirin Development encourages Suppliers to enhance the competence and environmental responsibility of their employees and to engage in environmentally friendly initiatives and prevention programmes.

As a responsible business, Sirin Development invites suppliers to align with CO₂ reduction targets, to sort waste responsibly, to contribute to the reduction of landfill, and to reduce CO₂ emissions in their direct activities, services, works and goods.

Suppliers must ensure that the materials they provide are transparently and sustainably sourced, certified to standards, free from hazardous materials or do not generate (or minimise) hazardous waste.



Human Rights and Social Responsibility

Sirin Development is committed to transparent business principles, upholds and protects human rights and freedoms, and is socially responsible to its employees, customers, and suppliers. Accordingly, it sets similar expectations for its suppliers, as outlined below:

01 In the course of their activities, suppliers shall commit to respecting and protecting human rights and freedoms, and promoting democratic values, in accordance with the principles set out in the Universal Declaration of Human Rights and the United Nations Global Compact.

02 Suppliers shall promote diversity among their employees and shall not tolerate any form of discrimination, including but not limited to age, gender, race, nationality, citizenship, ethnic origin, language, social status, religion, belief, sexual orientation, disability, health, marital or family status, membership in a political party or association, or any other characteristic protected by law.

03 Suppliers shall not tolerate any form of harassment, violence, humiliation or bullying.

04 Suppliers collecting personal data or using monitoring tools for employees shall always respect the privacy rights of employees, customers, and other relevant parties.

05 Suppliers shall respect workers' freedom to express their opinions and shall not take repressive actions against those who exercise this right.

06 Suppliers shall protect employees and their representatives from hostile behaviour, retaliation and other negative consequences, if they report incidents or give evidence.





Conditions of Work

Suppliers must adhere to the following principles and processes that ensure the right conditions for employees to perform their duties:

01 To ensure fair and competitive wages, Suppliers shall pay their employees an appropriate wage in compliance with national wage legislation.

02 Suppliers guarantee that employees will not exceed the maximum number of working hours permitted by law within a given period. For overtime, Suppliers shall pay additional remuneration at the rates specified in national legislation or collective agreements.

03 Suppliers recognize the right of workers to freely form trade unions or other organizations representing workers, and to choose whether or not to participate in them and in collective bargaining.

04 Suppliers shall explicitly declare that they do not directly or indirectly employ or use workers below the minimum age for employment set forth in International Labour Organisation Convention No. 138, in accordance with applicable legislation.

05 Suppliers shall prohibit all forms of corporal punishment and forced labour, including modern slavery, human trafficking, prison labour, debt bondage, and other forms of forced labour, as outlined in the International Labour Organization's Protocol No. 29.

06 Suppliers shall adhere to the above principles and are encouraged to raise awareness of the issue and commit to contributing to the prevention of these practices.

07 Suppliers shall be responsible for ensuring the safety of workers in their workplaces, including regular inspection of all machinery and equipment, and ensuring that only qualified workers perform the work. Suppliers must have valid emergency plans and documentation in line with safety requirements.

08 Suppliers must provide their employees with the minimum safety equipment and ensure that all hygiene standards are met.

Business Ethics and Governance

Suppliers must operate according to principles that foster the right business environment and governance, as outlined below:

01 Suppliers shall have a clear and strong stance against bribery, money laundering, abuse of office, and all other forms of corruption. Suppliers shall have a clear policy against all forms of corruption and shall be committed to preventing such behaviour. In the event of an incident, Suppliers will take appropriate action to ensure that the incident is resolved and that corrupt behaviour is not tolerated. Suppliers shall undertake not to accept any gift that would improperly affect the interests of the Supplier, Sirin Development or any other business partner. In the event of suspected misconduct of a similar nature, the Supplier must inform Sirin Development.

02 Suppliers shall not engage in any unlawful form of agreement or arrangement that restricts fair competition or constitutes a cartel with competitors, such as the sharing or allocation of markets or customers, or agreements on prices.

03 Suppliers shall avoid any situation which may give rise to a conflict of interest. Suppliers are expected to have a plan of preventive measures in place to deal with incidents of this nature. In the event of a conflict, Suppliers must inform Sirin Development immediately.

04 Suppliers shall support transparent, harmonised and cooperative business relationships.

05 Suppliers must comply with all applicable legislation regarding GDPR compliance.

06 Suppliers must responsibly manage all information related to their business and business partners.

07 Suppliers are expected to protect all digitally stored data and documents from cyber intrusion.

08 Settle accounts with subcontractors/suppliers who, having direct relations with the business partner, provided goods/services or performed work for the Group's companies.



Oversight, Responsibility and Communication of Compliance with the Supplier Code of Conduct

Sirin Development encourages Suppliers to adhere to the principles set out in the Supplier Code of Conduct and reserves the right to require documentation to verify compliance.

01 Suppliers shall put in place and maintain effective management systems to ensure compliance with the provisions of this Code of Conduct. They also undertake to provide evidence and any necessary information if requested. Such management systems must be proportionate to the size, complexity and risk level of the business.

02 Sirin Development encourages Suppliers to ensure that their Sub-suppliers comply with the minimum standards set out in this Code of Conduct.

03 Suppliers shall actively monitor their day-to-day management processes to ensure compliance with this Code of Conduct and shall provide the necessary information when requested by the Group.

04 If Suppliers provide incorrect information, avoid correcting identified discrepancies, or if it becomes apparent that the irregularities or discrepancies cannot be corrected, the Group reserves the right to assess the consequences of such behaviour in the context of the scope of the contracts between the Group and the Supplier. This may influence decisions on further cooperation.

05 The Supplier shall actively work to remedy any non-compliance with the requirements of the Code of Conduct that it has identified and shall endeavour to remedy such non-compliance promptly and within a reasonable time.

06 Suppliers can be assured that a good faith report of a possible discrepancy will not adversely affect their relationship with the Group if it takes steps to address and correct the discrepancy.

The Group may carry out assessments and reviews to ascertain the Supplier's compliance with the requirements of the Code of Conduct. It may also request information or initiate visits to the Supplier's premises and/or places of business. The Supplier shall provide access to the Group's representatives to the information necessary to verify compliance with the requirements of the Code of Conduct and allow physical access to the relevant premises and/or places of business.

If Suppliers encounter difficulties in attempting to remedy non-compliance with the Code of Conduct, the Group encourages them to contact the Group's representatives and to jointly seek possible solutions (the Supplier may contact the Group's representatives by e-mail: info@sirin.eu).



Suppliers are expected to be guided by Sirin Development's values when providing goods, services or works and to join the journey towards sustainability.

Sirin Development has the right to carry out a screening process of Suppliers to monitor compliance with the requirements set out. The following indicators and factors can be monitored:

01 Negative media coverage.

02 Sanctions lists

03 Information on human rights violations

04 Operational data

05 Corruption incidents, bribery or other negative activities

The Supplier Code of Conduct is available at

www.sirin.eu





We build.
You **grow.**



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