



## **Supplier Code of Conduct**

<b>Adopted by</b>	Board of Directors
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<b>Document owner</b>	Chief Executive Officer

## Code of Conduct

### Introduction

This Supplier Code of Conduct (“sCoC”) applies to all Asset Management Partners (“partners”) and material suppliers (“supplier”) of Alma Property Partners (“Alma”). Alma manages real estate funds in compliance with local laws, Alma Funds' legal documentation, and the expectations of its key stakeholders. At Alma, we aim to be an enabling partner for sustainable investments and good governance. We select partners and suppliers who share our commitment to social responsibility and sustainable business practices. This sCoC document sets the standards for how we expect our suppliers to behave with regards to their social, environmental, and ethical business practices. To clarify our expectations for suppliers and business partners, we have developed this code of conduct, which addresses Alma’s values, principles and important material issues: human rights, workers' rights, environmental issues, and anti-corruption measures. The sCoC is built upon international standards for responsible corporate behavior, including the Ten Principles of the UN Global Compact (UNGC) and inspired by the OECD Guidelines for Multinational Enterprises. To initiate a business relationship with us, all suppliers and partners in scope are expected to follow the principles set out in this document.

### Supplier Requirements

Partners & suppliers are expected to work structured with environmental, social and governance issues that are reflected in our common risks and opportunities. Partner and suppliers are expected to work actively with these issues. Material suppliers in scope of this sCoC are defined as direct supplier in any construction projects. Partners are in relation to this sCoC expected to be aligned with Alma’s responsible investment practices in general, please refer to Alma’s Responsible Investment Policy. Suppliers must comply with and not violate any United Nations Security Council Resolutions, EU restrictive measures or sanctions adopted under EU’s Common Foreign and Security Policy or other sanctions, import or export bans, trade embargoes or other restrictions imposed, administered, implemented, recognized or enforced by Sweden or any of EU’s member states, or such other country where a supplier is domiciled or subject to jurisdiction.

### Human rights

We encourage all partners and suppliers to always seek ways to honor the principles of internationally recognized human rights, even when faced with conflicting requirements.

Partners and suppliers must respect fundamental and internationally recognized human rights in all areas of their operations. The partners and suppliers have a responsibility to not cause or contribute to adverse human rights impacts through their own activities and address to Alma such impacts if they would occur.

### Child labor and compulsory Labor

We oppose forced labor in all its forms and adhere to international labor standards defined in ILO conventions. This commitment spans our entire value chain, including a strict stance against child labor, human trafficking, and any coerced labor.

Workers should not be mandated to provide deposits or surrender identity papers for employment. Each worker has the right to terminate their employment with reasonable notice. When suppliers work with staff recruiters or agencies, they must ensure workers are not burdened with recruitment-related fees. Suppliers must diligently adhere to all legal requirements and follow ILO Convention guidelines on minimum employment age. We expect our suppliers to actively prevent child labor or exploitation within their influence.

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Suppliers are expected to establish a minimum-age verification system for workers at the time of employment, maintaining comprehensive documentation to demonstrate compliance. Non-compliance with child or forced labor requirements necessitates remedial actions by the supplier.

#### Working conditions

Suppliers must ensure fair treatment and working conditions for their employees, including providing employment contracts are mandated by law. We strictly prohibit threats, punishment, or any form of abuse towards workers. Wages should be both adequate and market-based and working hours should adhere to industry standards and regulations.

Comprehensive safety measures must be in place to prevent workplace accidents and injuries, including the reduction of inherent hazards. When applicable, suppliers are expected to establish a documented health and safety management system and provide regular training to workers, including new or reassigned employees. Each supplier is expected to designate a person responsible for workers' health and safety.

Suppliers are expected to support workers' freedom of association and their right to form or join a trade union. Interference with collective bargaining activities is prohibited, and worker representatives should be respected.

#### Non-Discrimination

We promote diversity and inclusion, and suppliers and partners are expected to support the protection of vulnerable groups and support diversity in all its forms.

No person should be treated unfavorably due to factors such as gender, age, nationality, ethnicity, cultural background, religious beliefs, political opinion, disabilities, and health information. Suppliers are expected to ensure the fair and equal treatment of people and protect them from discriminatory practices in the workplace. Each employee among our suppliers should understand the fundamental terms and conditions of their employment, and individuals with similar experience, performance, and qualifications should be compensated equally for equivalent work.

#### Anti-Bribery and Corruption

We hold all our business partners and individuals representing them to the highest ethical standards, including strict adherence to anti-corruption laws. We unequivocally prohibit any form of corrupt business practices, such as bribery, extortion, kickbacks, or the provision of improper benefits, whether directly or indirectly, to customers, agents, contractors, suppliers, employees, or government officials. Our commitment to conducting business with integrity means that the offering, giving, or acceptance of illegitimate benefits to facilitate, maintain, or expedite business transactions is entirely unacceptable. It is the responsibility of our suppliers to ensure that such benefits are not exchanged in the course of their business activities.

In line with our dedication to integrity, we will conduct an integrity due diligence before engaging any partner representing our company or acting on its behalf. We will not engage with business partners whose involvement could expose our company to inappropriate levels of corruption, integrity, or compliance risks.

#### Fair Competition

Alma expects all suppliers to engage in fair competition, in accordance with applicable antitrust laws. Sharing information or entering into agreements or coordinated activities with competitors or counterparties that would breach any applicable competition laws or regulations is unacceptable.

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#### Environmental Responsibility

Alma prioritizes proactive measures to minimize adverse impacts on the environment throughout our value chain. This commitment encompasses pollution reduction, the promotion of efficient and sustainable resource use, and the mitigation of greenhouse gas emissions. Compliance with national and international environmental legislation and regulations is of paramount importance.

We expect that our suppliers and partners consistently adhere to environmentally responsible practices and abide by all applicable legislation. Suppliers are expected to establish procedures and standards that, at a minimum, meet legal requirements. We expect suppliers to actively work towards minimizing their environmental impact. Environmental considerations will be a criterion in the supplier-selection process.

#### Supplier Due Diligence

In addition to this sCoC, Alma has a tool for supplier due diligence for companies within the value chain to enable identification of actual or potential risks and harm to human rights, business ethics and the environment. This sCoC together with the Supplier DD tool, is part of Alma's process to identify, assess and diminish any ESG risk within the supply chain.

#### Violations of the Supplier Code of Conduct

If a breach of the Code of Conduct occurs, suppliers must promptly report the violation to Alma. In situations where a supplier fails to comply with the Supplier Code of Conduct or does not take corrective measures within a reasonable timeframe, Alma considers it a material breach of the agreement.