

Code of Conduct



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Introduction



Marián Hlavačka, CEO Corwin

“Our company was built on the idea that real estate development can be done better. That sustainability is not just a mere buzzword but a necessity. It was built on the idea that a few dedicated individuals can work together and really make a difference.

We are proud of the fact that we have been leading the field in sustainable architecture for over a decade. We were the first to introduce green roofs as standard on every building, first to initiate a large-scale residential ceiling cooling scheme and the first to create a LEED Platinum certified office building in Slovakia. But the work of a green trendsetter is never done. Our Code of Conduct serves as a manifestation of our values and the formal declaration of our ambition to push the benchmarks even

further. Because our mission was never to just follow the common standards but to go beyond, explore what is possible and inspire others to do the same.

I believe that each individual plays a unique role in creating a better sustainable future. Because only if we improve ourselves can we improve the world. So, speak out, share your ideas and don't be afraid to dream big. That way, together, we can build an amazing company.”



We are CORWIN

➤ Vision

Becoming a leader in sustainable real estate and the driving force behind positive and responsible urban development.

➤ Mission

Creating a natural environment for people.

➤ Values

At CORWIN we are:

Active

“Healthy buildings, healthy spirit”
We build upon the natural environment of our projects to make people feel secure, comfortable and engage in a healthy lifestyle.

Sustainable & Green

“We live with respect for nature”
Sustainable development starts from within. We encourage green practices within our offices and support our employees’ efforts to live in harmony with nature.

People-centred

“Creating value for future generations”

People’s wellbeing and happiness should be at the core of every development. That is why we engage with people and their needs in every detail of our projects.

Innovative

“Be fresh. Be new. Be better.”

New ideas are what moves our business forward. Innovation, creativity and outside of the box thinking is a core part of our work.

Committed

“Everyone has the right and the duty to be the best version of themselves”

We expect each employee to grow and improve in their professional and personal lives.

Our Workplace

Years of practice in sustainable development has shown us that our employees are our greatest asset. That is why we do our best to not only protect their health & wellbeing but also to help them grow, develop and become more sustainable in their daily lives. We are committed to further educate our employees and provide a fair, inclusive and friendly work environment that encourages debate, cooperation and a family atmosphere.

Employee development & Personal growth

- Each employee is encouraged to seek innovative solutions and improve the efficiency of company processes.
- Employees are supported in expanding their knowledge and know-how through sponsored development courses.
- We encourage networking and sharing of good practices between employees.
- Managers are expected to provide frequent constructive feedback and guide the personal and professional growth of their team.

Health, safety & wellbeing

- Comprehensive health & safety planning is conducted early in order to make sure all employees understand and follow our high safety standards.
- Each employee is trained and expected to adequately respond to any potentially hazardous situation in their line of duty, as well as report any workplace incidents or unsafe conditions to their supervisor or a relevant health & safety authority.
- In addition to our internal mechanisms,

professional trainers, personal coaches and other external experts are frequently called in to help with, protect and improve the physical and mental health of our employees.

- Special measures are taken in order to adequately respond to unforeseen events, such as the Covid-19 pandemic, including regular company-wide PCR testing, medical equipment distribution, special scheduling, tracing, reporting and statistics.

Fair working conditions

- All employees with matching job descriptions or performing equivalent roles within this company are to be treated equally with regard to all aspects of their terms of employment (i.e., working conditions, selection for short-term working, transfers, procedures for disciplinary measures and termination of employment).
- It is the responsibility of every department head or manager to support and communicate the principles of equal opportunities.
- Leaders must encourage open discus-

sion with their employees to identify and resolve problem areas.

- We ensure that all uses of personal data (such as collection, registration, comparison, storage and deletion, or a combination of these) take place in accordance with applicable laws and regulations.

Diversity, Inclusion and Speak up culture

- At Corwin we fully support a working environment free from discrimination and harassment. Recruitment, employment, training and promotion practices and policies are free of barriers, that could directly or indirectly discriminate people based on race, sex, disability, religion, age,

orientation, civil or family status.

- Employees are encouraged to raise questions or concerns about any type of discrimination at the workplace and are advised to bring these issues to the attention of their immediate supervisor, the HR department or anonymously to a dedicated mailbox.
- Any concerns or reports are accepted anonymously or in person without the fear of reprisals.
- Any and all forms of discrimination are prohibited and an employee engaging in any form of discrimination will be subject to disciplinary action.



Corwin office



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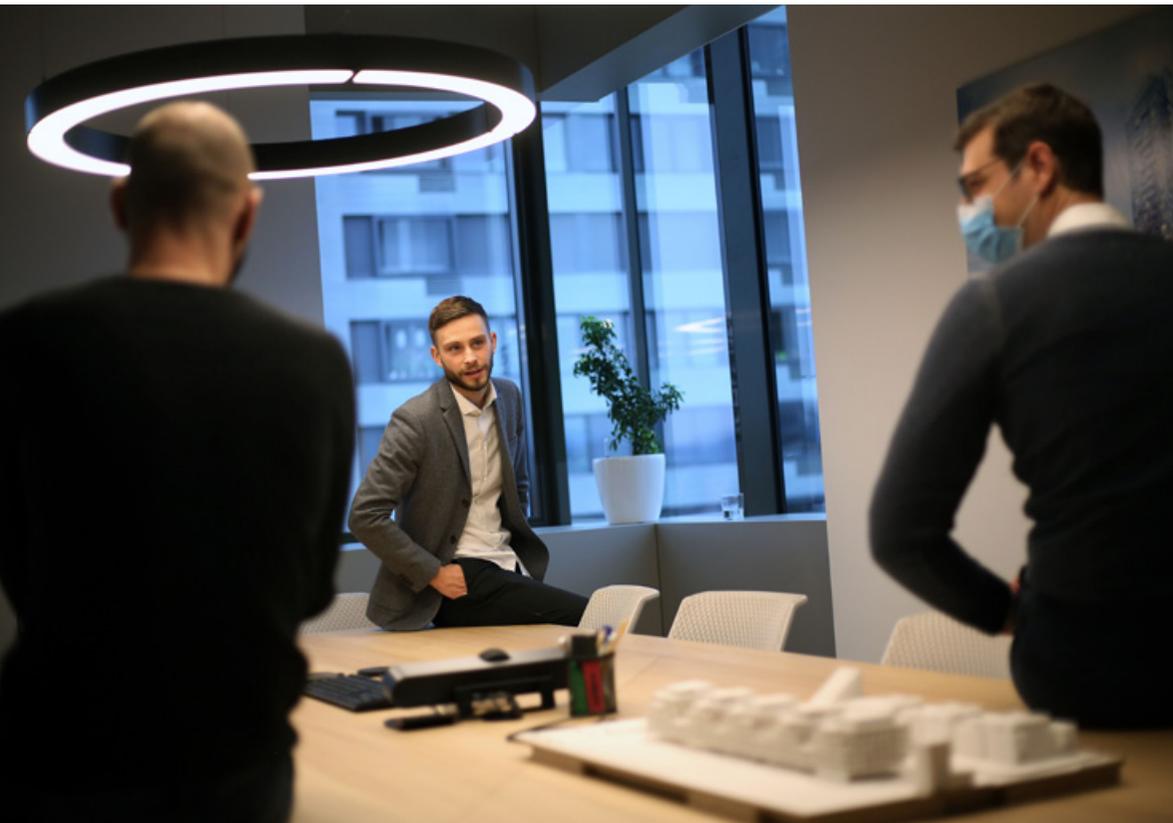
Competitive & Transparent Marketplace

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Transparency is our strength. Our success in a competitive market is continually ensured by delivering the best value for our clients, customers and shareholders. That is why we have developed an internal construction execution and oversight chain that allows us to ensure the highest quality of our products. Apart from our team of in-house professionals, we also seek cooperation with an extensive range of world-leading experts, partners and stakeholders in order to achieve the highest levels of quality, fairness and reliability in our products. That is why we set stringent criteria for ourselves, as well as our collaborators on the path to a stronger local economy and sustainable growth.

Conduct & relationship with stakeholders on the market

- We are committed to foster fair and constructive long-term business relationships with organizations whose values are aligned with our own.
- We are committed not to compromise any of our values and principles within our business operations.
- We believe that stakeholders conducting business with Corwin are devoted to ethical conduct and the high criteria we expect from them.
- We reject corruption in any form. We do not accept or support similar practices of our employees, partners or institutions with which we are in a contact. We avoid situations that may constitute any conflict of interest.
- We safeguard ideas, processes and business information that is important for competitiveness and maintaining trust of our stakeholders.



Corwin Slovenia



Gehl Architects at Palma

Transparent & honest communication

- The trust we earn is the result of reliable, professional and honest information we provide to our stakeholders.
- We ensure that the marketing of our products and services is truthful and accurate.
- Regular collection of feedback from our customers and client is the way we develop our products and services to achieve higher satisfaction.
- Our customer and clients receive clear contracts and continuous information about things affecting their situation and decision making.
- We remain politically neutral and do not give donations, financial or other contributions to any political party nor make statements in favour or against political candidates or institutions.



Guthaus

Decent & fair competition



- As a private company we support open market and fair competition with all market participants. We believe that fair competition in the marketplace improves efficiency and drives innovations that benefit everyone.
- We require all employees to avoid situations which could be considered questionable and pose a risk of breaching the competition regulations. We cannot tolerate any violation of antitrust laws, competition laws or any other related regulation.
- We do not disclose any sensitive information to our competitors relevant to our business that is not publicly available.
- We provide sufficient training for our employees to help them identify and avoid any risky or illegal situations regarding antitrust and competition laws.
- We avoid any arrangements, agreements or coordinated practices which could lead to restricting the competition.
- All our employees are encouraged to speak out against any suspectedly unfair, irresponsible or illicit conduct.

Quality of our products & services



- Quality is the key element of our success and we are committed to continue to provide the best services for our clients and to maintain the highest quality standards for our products.
- Our projects are developed in accordance with tested urbanistic practices to ensure maximum benefit for people in and around them.
- We continuously seek new ways to make our projects and their development more sustainable. That includes adhering to the strictest LEED criteria and carefully selecting the finest materials.
- We do our best to provide products and services which fulfill and exceed customer's and client's expectations by implementing innovative processes and proactive problem solving.
- All of our products and services must take into account the safety of our employees, partners and customers.

Reporting misconduct



Any violation of our values and policies may also be reported anonymously through a complaint that the whistleblower may indicate in writing by mail, courier service or in person to the filing office, in person at the Company's registered office, by e-mail to: corwin@corwin.sk or by inserting it into the mailbox located at the registered office of the Company. The notifier is also protected against any form of retaliation. Information on reporting of misconduct can be found in our Directive.

Community & Nature Development

We believe that good urbanism should be the core part of any development. As the world around us constantly changes, our responsibility to protect the environment for future generations becomes ever more pressing. We are committed to decrease the impact of our operations through good urbanism and innovation in order to secure long-term sustainability.

As a developer, we also feel a great responsibility towards the city itself and believe we have a role in guiding its positive development into the future. Based on this belief, we have adopted 5 interconnected urbanistic principles we see as key to achieving responsible growth and creating a sustainable city that simplifies and improves people's lives.

Healthy City

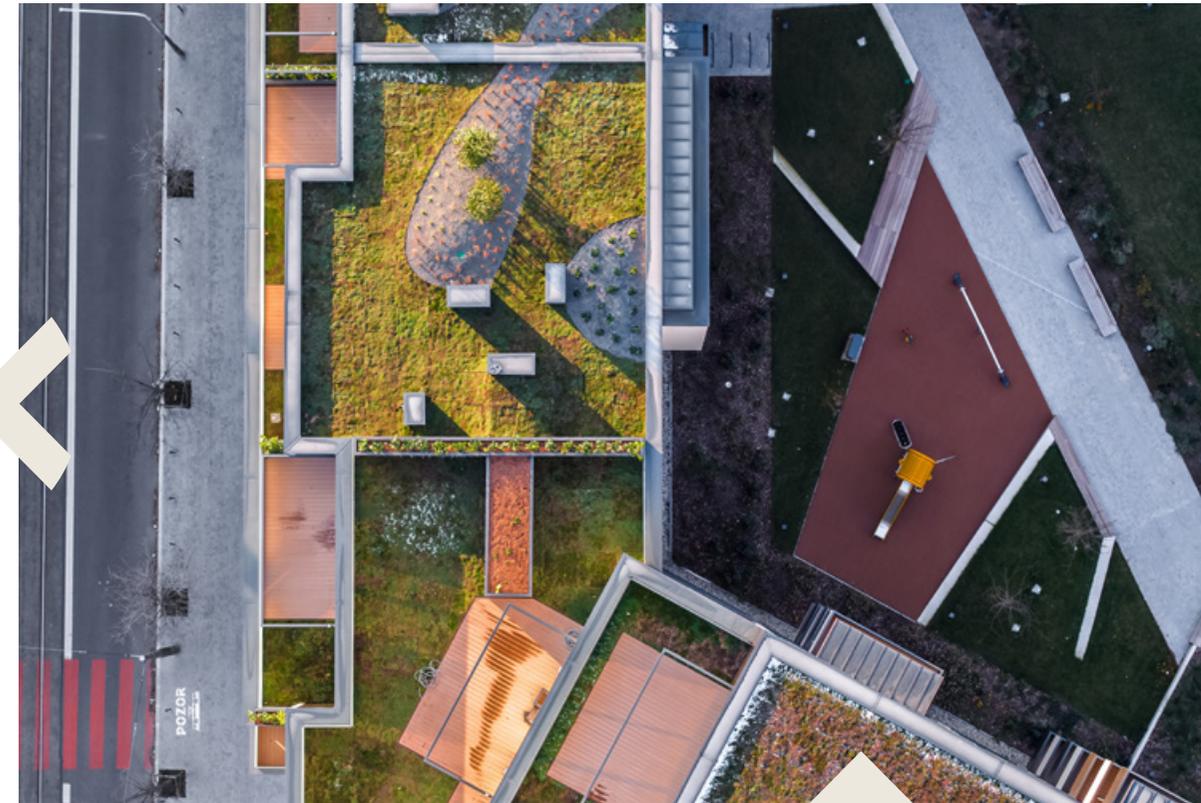
Better Places for a Better Life

We implement technologies that improve the quality of indoor and outdoor environment. Our LEED certified office buildings provide the best working environment and the cycling infrastructure, sports and leisure facilities we create promote a healthy, active lifestyle.

- Implementing innovative technologies based on LEED frameworks helps us reduce environmental impact and at the same time create a healthier interior climate.
- Our projects boast the largest and second largest ceiling cooling scheme in Slovakia.
- Rain gardens and other water retention technologies help lower the impact of torrential rains, preserve water resources and cool the city microclimate.



Healthy Green offices at Einpark



Green roofs and green spaces of Blumental

Green City

Protecting Our Planet

Sustainability is the staple of our work. Apart from creating the most sustainable projects in the country, energy efficient buildings and lowering our overall environmental impact, each project we build is covered with green roofs.

- We build urban greenery wherever we can. Trees, green roofs and public parks not only reduce the city heat island effect but also provide a more pleasant and calming urban environment.
- Careful planning and efficient resource use help us improve the environmental performance of our projects during their entire life cycle – from the construction to the daily operation.
- We strive to carefully assess the environmental aspects during the acquisition process to minimize the environmental risks of our investments.

Compact City

Promoting Effective Growth From Within

The city needs to be built in a human scale. Our projects are walkable, effectively use city space, support alternative means of transport and help create an environment that is best suited to humans, not cars.

- Combining various amenities helps us reduce the necessary travel distance and car use.
- Our acquisition policy is focused on projects in close proximity to public transport connections to improve walkability and promote public transport use.
- We support cycling through infrastructure development on and around our projects.
- We invite urbanists from around the world to help us improve our projects, help boost positive city development and create better living conditions for local residents and the surrounding neighbourhoods.



Matej Korvin Square



Matej Korvin Square

Diverse City

Community is the Best Investment

A good public space is one people can appreciate and identify with. We always try to capitalize on local communities' assets and support their growth through good placemaking and polyfunctional city development.

- We reinvest into the surrounding community by supporting public space revitalization and preservation projects.
- Our diverse, open public spaces combined with active retail serve as an inviting space for meetings, dining and shopping which helps support the local economy.
- We engage with communities by creating educational sessions, supporting local artwork and hosting community festivals such as BlumentaLive.
- Our investment into communities through our projects and associated activities helps us create long-lasting relationships with our stakeholders.

Flexible City

Repair. Reuse. Recycle.

City development is never finished. Transforming neglected areas, revitalizing brownfields and finding adaptable solutions are key to creating a city capable of reacting to global challenges without losing its own unique character.

- We support the preservation of historical structures through direct financing and stakeholder cooperation.
- Our acquisition policy is focused on prioritizing brownfields within the city to promote rational and flexible redevelopment.
- We strictly avoid using hazardous materials during the construction of our buildings and provide environmental remediation on land polluted by former owners.
- Our internal ECoRwin team helps educate and inspire employees and tenants to adopt a more environmentally friendly approach in our offices and their daily lives



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Palma

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