

DEAS Human Rights Policy Statement

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1 Introduction

DEAS acknowledges our responsibility to respect basic human rights in alignment with the UN Guiding Principles on Business and Human Rights, the core conventions of the International Labour Organisation (ILO) and the International Bill of Human Rights, and we have a zero-tolerance approach to all forms of human rights abuses within our business.

This statement outlines our overarching commitment to respect human rights, which is also echoed throughout our Codes of Conduct, internal policies, procedures and processes throughout our business.

2 Purpose

The purpose of this Policy Statement is to communicate to DEAS A/S, DEAS Asset Management and its affiliated companies (hereinafter referred to as **DEAS**) and its employees, customers, suppliers, shareholders, and the communities in which we operate, that we respect human rights and seek to uphold them throughout our business decisions, activities, and partnerships.

3 Commitment

At DEAS we are committed to respecting internationally recognised human rights, including labour rights, by identifying our risks of adversely affecting the rights of our employees, customers, business partners, suppliers and the societies in which we operate.

We acknowledge that DEAS can contribute, cause or be linked to adverse human rights impacts in our own operations and through our business relationships. We are committed to mitigating any negative impacts on individuals, workers and communities which we have caused or contributed to directly through our own operations or through the operations of our suppliers, and we commit to cooperating with judicial or non-judicial mechanisms to ensure access to remediation.

We continually strive to improve our sustainable business practices, and we expect those we do business with to do the same. We expect our suppliers, our customer portfolio, and our business relationships to also respect human rights and apply the UN Guiding Principles on Business and Human Rights, and other relevant international human rights standards, as well as work to mitigate any negative impacts on human rights.

We expect all employees to protect and respect human rights and to act in accordance with our Code of Conduct and any other sustainability related policies, instructions and guidelines.

We aim to provide transparency to all stakeholders on our human rights risks and due diligence efforts and provide relevant disclosures outlined in our ESG Report and Annual Report.

4 Principles

4.1 Respecting human rights in our own operations

At DEAS we want to grow an inclusive, sustainable, and engaging workplace, where we maintain a safe and healthy work environment and promote diversity, inclusion and equity. We do so by having:

- a zero-tolerance towards any type of discriminatory behaviour and harassment as stated in our Code of Conduct and Policy on Inclusion, Diversity & Equity;
- human resource management procedures to ensure that employees are treated fairly, according to our ethical standards, and in accordance with applicable laws and collective agreements where applicable;
- employee training and professional development programmes to ensure that employees adhere to our policies and procedures;
- ongoing efforts to ensure a healthy workplace both physically and mentally;
- processes in place to safeguard employee data being used for any other purpose than legitimate business purposes to respect employees' privacy; and
- a whistleblowing hotline through which potential or actual wrongdoings can be reported.

Part of our Diversity and Inclusion policy is to ensure that all employees are provided with equal opportunities and terms. As part of our efforts to improve gender equality, we regularly update our targets for the gender composition of our Board of Directors, Management Board and management positions. In addition, we remain focused on the gender composition in recruitment and selection process, performance management process and KPIs, and when preparing the pipeline of talents and successors for key positions.

4.2 Respecting human rights in our value chain

Generally, we expect our business relationships to:

- respect human rights as declared as a minimum in the International Bill of Human Rights and the International Labour Organisation Declaration of Fundamental Principles of Rights at Work and apply the UN Guiding Principles on Business and Human Rights;
- respect and ensure working conditions that enable a fair standard of living, e.g. a maximum set of working hours, rest periods and minimum wage;
- ensure equal treatment and working conditions for all employees;
- have disciplinary and grievance mechanisms in place that not only deal with employee complaints, labour law violations and conflicts but also monitor for and ensure compliance with labour laws;
- focus and adopt policy commitments on health and safety in accordance with local standards and conditions;
- respect the rights of children and refrain from using child labour, damaging children's physical or mental health or preventing them from going to school;
- refrain from using labour that is forced, bonded or indentured; and
- uphold a work environment free from harassment and bullying.

4.3 Respecting human rights in our property management and asset management

A person's home forms the natural framework for private and family life and is included as a protection under human rights. Similar applies for commercial tenants, where the location forms the framework for the tenant's place of business and source of income for the business tenant and any employees of the business tenant. At DEAS we take great care and pride in ensuring, that we live up to the tenants' protection as set out in the applicable Rental Acts for residential and business premises in the jurisdictions in which we operate, whereby tenants obtain, amongst other, protection against arbitrary eviction as well as having the detailed legal relationship between tenant and landlord regulated.

We ensure that we have processes in place, whereby the private life of the tenant is protected by e.g. never obtaining access to a tenant's rental unit unless agreed upon with the tenant or when the conditions require it, e.g. to protect the building and/or other tenants health and safety.

We do not discriminate based on gender, race or ethnicity when renting out units on behalf of our customers.

4.4 Respecting human rights in procurement

We foster social responsibility in our supply chain through our Supplier Code of Conduct, which defines the standards for which DEAS suppliers must adhere to. In our Supplier Code of Conduct it is clearly stated that suppliers are responsible for setting the same or comparable standards for their subcontractors, and all suppliers must sign off on our Supplier Code of Conduct.

If a supplier is unable to live up to the requirements in the Supplier Code of Conduct the business relationship will be reviewed, corrective actions pursued and potentially the relationship will be terminated dependent on the severity of the breach. In our Supplier Code of Conduct we also reserve the right to audit the supplier to make sure that our suppliers live up to the ethical standards of DEAS.

5 Complaints and remedy

We are aware of the importance of enabling effective remedy wherever we are directly linked to or have caused or contributed to human rights impact. Our grievance mechanisms help us do this, and we build on the awareness and educate our employees on human rights, including labour rights, encouraging them to speak up about any concerns they may have, through our grievance channels.

We also support dialogue and open communication channels and encourage individuals and communities to raise any concerns with us directly.

We aim to co-operate with competent authorities in investigating alleged human rights impacts.

Any stakeholder can submit complaints about DEAS through our website or through our whistleblower channel.

6 Going forward

The principles of this Policy Statement continue to be implemented across our operations and value chain.

We continually evaluate and review how best to strengthen our approach to addressing human rights, including labour rights.

We increasingly see the impact on human rights from environmental and climate change, and work to reduce and avoid these impacts to the best of our ability. At the same time, we recognise that some mitigation measures taken to reduce environmental impacts may adversely affect individual's human rights, and we strive to address this by taking a human rights lens to our environmental commitments.

Policy Governance

Owner:	Group CEO
Last updated:	February 2024