

Code of Conduct



Introduction

1. The Horse capital group and each of the companies belonging to the group (the company belonging to the group is defined for the purposes of the Code as the **'Horse'**) is guided by the values of respect, integrity, transparency of its activities, security, and a sense of responsibility for the well-being of employees, associates, contactors and users of commercial and office space, as well as the welfare of the environment.
2. The ambition of Horse in the scope of its business is sustainable development.
3. The Horse Code of Conduct (the **'Code'**) is an expression of the fundamental values and the standards by which Horse is guided and which it applies as part of its business activity, and the observance of which Horse also expects from the members of its corporate bodies, employees, associates, and contractors.
4. The detailed rules of conduct within the scope of the activities carried out by Horse are set out in the policies and procedures relating to the specific areas of Horse operations.

Purpose

1. The purpose of the Code is to define:
 - the standards of conduct in Horse business activity;
 - conduct unacceptable to Horse and its consequences;
 - the responsibility for applying and monitoring the Code and its principles.
2. By adopting the Code, the ambition of Horse is to undertake all possible measures to ensure that Horse, its employees and associates as well as EPP as an asset manager conduct business activity in a fair and transparent manner, in accordance with the best interest of Horse, in particular, in accordance with its strategic, corporate and financial goals.

Responsibility for applying the Code

1. The EPP Management Board is responsible for the implementation, application and monitoring of the Code's application.
2. In the operational activity of Horse, ensuring the application of the principles set out in the Code is entrusted to the directors of EPP organisational units, shopping centres managers, managers of office facilities and persons holding managerial positions.
3. The Director of the Legal Department and the HR Director of EPP are responsible for monitoring the application of the principles resulting from the Code throughout the organisation, maintaining employees' and associates' awareness of the principles of conduct expressed in the Code and for adapting the Code to changing legal, economic, social and environmental circumstances.
4. Each employee and associate is responsible for applying the Code in their daily work for Horse.

5. The rules of conduct which Horse expects its suppliers to follow are set out in the Horse Suppliers Code of Conduct .

Standards of Conduct

1. Horse conducts its business activity in a transparent and honest manner, providing its stakeholders with information on the achievement of financial objectives, as well as those related to its sustainable development strategy.
2. Horse is committed to act in accordance with fair business, marketing and advertising practices, and take all reasonable steps to ensure the quality and reliability of the services it provides.
3. Horse considers requests for the provision of information on the achievement of the objectives of its sustainable development strategy and other areas of Horse activity , taking into account restrictions resulting from the obligations of Horse's representatives to act in Horse best interests and to protect business secrets, confidential information or personal data and Horse reputation and goodwill.

Employees and associates

1. Horse is committed to providing a safe and healthy working environment for its employees and business partners. The expression of this commitment is the Human Rights and Due Diligence Policy which Horse has adopted. Employees and associates perform their work for Horse in an honest manner with full respect for other people.
2. High standards for individual behaviour must be observed in relations with colleagues, as well as in contacts with suppliers, tenants, representatives, professional advisors, shareholders, banks and other third parties.
3. Employees are responsible for the results and reputation of Horse. Their responsibilities include avoiding any behaviour which could harm the financial and operational results or reputation of Horse, result in a violation of the provisions of law by Horse, harm the natural environment or cause material damage to Horse.
4. Employees and associates should take care of the resources entrusted to them by Horse in order to carry out their work. Employees should refrain from actions which may result in the loss, destruction, theft, unauthorised or inappropriate use of Horse assets.

Diversity and the principle of equal treatment in employment and cooperation

1. Horse builds its organisational culture on the basis of respect, appreciation for diversity as well as equality of opportunity and treatment in employment, including but not limited to equal payment. It recognises the added value of a diversity of perspectives and competences for the joint work to the benefit of Horse customers and the users of commercial and office spaces.
2. Horse is therefore committed to combating all forms of discrimination and, at the same time, supports and promotes diversity among its employees and associates, giving them the opportunity to develop within Horse.

3. Horse expects its employees, associates and contractors to act with mutual respect for the dignity, diversity and fundamental rights of each individual.
4. Horse will not fail to address any signs of unequal treatment in employment or cooperation, behaviour violating human dignity or any manifestation of disrespect, caused by a lack of acceptance for diversity.

Compliance with law and business ethics

1. Horse, its employees, associates and contractors act in accordance with:
 - applicable laws, including but not limited to labour law, tax law and competition law;
 - values related to conducting business in an ethical manner and
 - the principles of fair competition.
2. Horse, its employees, associates and contractors do not apply any practices which may be considered as restricting or eliminating competition.
3. In its activities, Horse complies with all technical standards applicable to the business activity it engages in.
4. Any doubts regarding compliance with the law, business ethics or principles of fair competition should be reported to a direct superior or the Ethics Committee.

Security

1. In conducting its activities and investments, Horse is guided by the value of security, understood in a multi-dimensional way.
2. Horse entrust its asset manager, EPP to adopt procedures defining the rules of conduct and an action plan in the event of an emergency or crisis. To ensure their effectiveness, EPP is to regularly provide training to its employees and associates on the procedures in effect. These procedures are also communicated to lessees. EPP also verifies whether persons performing services to its benefit, the performance of which requires specific knowledge or competence, have the required knowledge or competences.

Reliability of financial reporting

1. Horse accounting records and source documents precisely and reliably describe the basis for, nature and actual value of transactions performed within Horse's activity.
2. Horse complies with all generally accepted accounting rules and procedures. No false, unreliable or misleading entries may be entered into its books and records.
3. Horse's auditors and accountants should be provided with complete information on economic events and transactions which occur within Horse's business activity.

4. Horse will regularly provide its shareholders with reliable information on its activities, structure, financial position and results in a timely manner.

Business integrity

Zero tolerance for corruption

1. Horse is committed to the principle of zero tolerance for corruption, as demonstrated in the Anti-Corruption Policy adopted by Horse.
2. Horse considers any form of corruption which an employee, associate or contractor, or a person being a member of an Horse corporate body may have committed in business relations (private corruption) or in relations with public authorities and persons performing public functions (public corruption), whether in the form of a material or personal benefit, to be impermissible and unacceptable.
3. Horse shall take all possible measures to counteract corrupt practices which could occur in connection with its business activity and shall take action, including legal remedies, in the event that corrupt practices are discovered in connection with Horse activity.
4. Any actions aimed at corrupting an employee or associate of Horse in order to obtain an undue advantage for the corrupting party, or any manifestation of Horse employees or associates giving or offering corrupt benefits, should be reported in accordance with the Horse Whistleblowing Rules.

Gifts

1. The provision, by Horse employees or associates, of gifts or invitations to events, including lunches or dinners, or their acceptance of gifts or invitations to events, including lunches or dinners, should take place in strict compliance with the Horse Gift Policy and the principles of purposefulness (marketing, promotion, maintenance of business relations), proportionality, neutrality, and the anti-corruption principles.
2. The provision of a gift or an invitation may never be aimed at obtaining an unjustified benefit for Horse in relation to other stakeholders on the market on which Horse operates.
3. Horse employees should not expose themselves to potential conflicts of interest by accepting gifts, favours or entertainment offered by a supplier, tenant or other third party, which do not meet the acceptability criteria for gifts set out in the Horse Gift Policy.

Conflicts of interest

1. An Horse employee should not act in situations where the personal or financial interests of the employee or their relatives could conflict with their duty to act in the best interest of Horse ("conflict of interests"). Employees should not seek to obtain benefits for themselves or others by abusing their position.
2. Even the appearance of a conflict of interest should be avoided, as it may affect the perception of Horse as a fair market participant and, consequently, Horse reputation and goodwill .

3. Obvious, potential or apparent conflicts of interest should be reported to a superior or to the Ethics Committee. Failure to report a conflict of interest constitutes a violation of this Code.
4. Employees should avoid any conflicts of interest arising from the positions held by, or other benefits offered to, their family members or other relatives, or accepted by such persons. Offers of employment made to employees in external non-executive or supervisory management positions by for-profit or non-profit companies should be approved by an executive director, or a non-executive director if the matter concerns an executive director.
5. This does not apply to activities which are limited in scope or to activities in local social organisations, for example, as a member of a school board, local sports association or owners' association.
6. Employees should refrain from holding financial interests in companies being competitors, tenants, or suppliers or any other third parties which are not listed on the stock exchange, at a level of materiality which would result in conflicts of interest or the appearance of a conflict of interest.

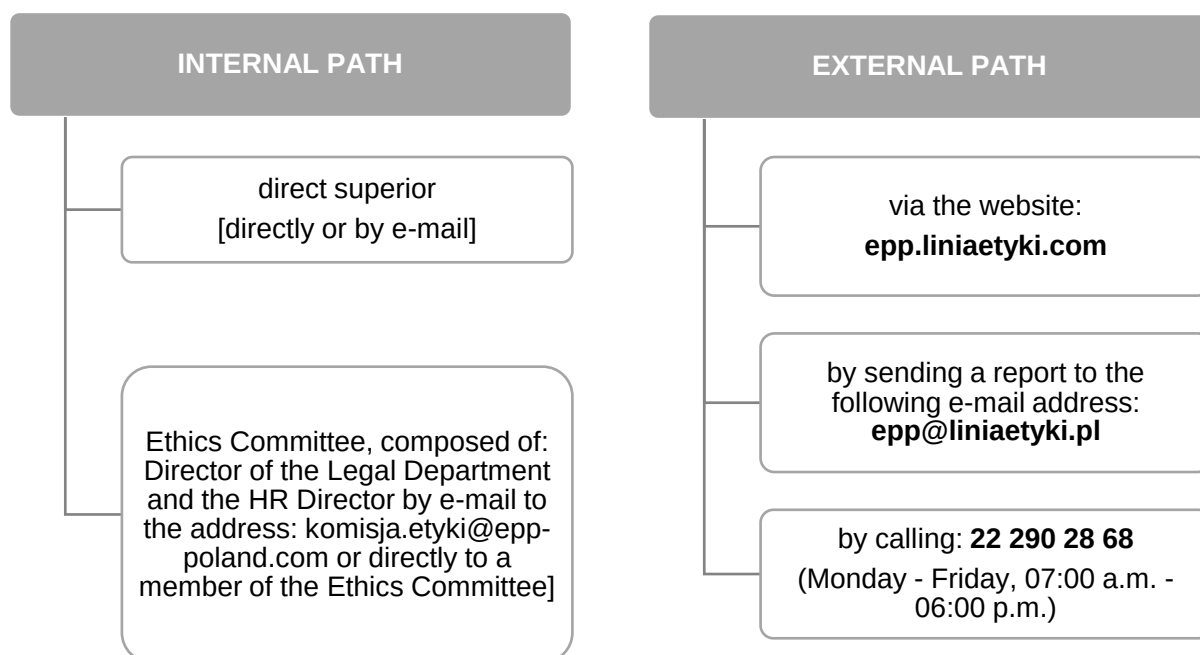
Business secrets

1. All information concerning Horse real estate, tenants, partners, customer portfolio, business plans, organisation, and financial affairs as well as all other Horse matters which are not disclosed as part of, among others, reporting on the achievement of the sustainable development strategy's goals, constitute, due to having economic value for Horse, business secrets of Horse.
2. Employees and associates exercise all due care to ensure that information constituting Horse business secrets which they have obtained or obtain in connection with their work for or the services they provide to Horse has not been unlawfully disclosed, disseminated, or used. Horse employees and associates do not provide undisclosed market information used by Horse to prepare offers to other participants of the market on which Horse operates; this also applies to meetings and all forms of industry-related conferences.
3. Horse employees or associates do not take any actions aimed at obtaining information constituting a business secret of Horse contractors, the knowledge of which is unnecessary for the proper performance of the obligations arising from the relationship with the contractors. They also do not seek to obtain or obtain market information used by participants of the market (especially competitors) on which Horse operates, in order to prepare commercial offers.
4. Horse employees or associates should not use information constituting Horse business secrets as part of their own business activity nor disclose it to third parties, whether or not the disclosure is made free of charge or in exchange for a personal or material benefit.

Monitoring compliance with the Code

1. The HORSE Group entrust its asset manager, EPP, with the monitoring of the compliance with the Code.

2. EPP employees and associates familiarise themselves with the rules of conduct expressed in the Code and make a statement that they will act in accordance with the principles set out in the Code when carrying out their duties.
3. The EPP's Director of the Legal Department together with the HR Director shall ensure annual training for on the Code for EPP and other procedures and policies which are relevant from the perspective of the principles and values expressed in the Code and on their effective application and compliance.
4. Infringements of the rules of conduct expressed in the Code should be reported in accordance with the rules set out in the Whistleblowing Rules, constituting internal notifications, which may be made in one of the following ways.



5. Direct reporting means the possibility to make a notification during a meeting.
6. Reports of violations of the Code should be made on the basis of credible information and in good faith.
7. Any report of a violation of the Code will be accepted and dealt with in a neutral manner and with due diligence and seriousness and, if there are grounds for doing so, the appropriate follow-up actions shall be taken.
8. A violation of the rules expressed in the Code may result in:
 - a. the imposition of disciplinary penalties on the employee as provided for in the Work Regulations;
 - b. termination of an employment contract or cooperation agreement;
 - c. legal action being taken in the scope of civil or criminal law.
9. The Director of the Legal Department and the HR Director conduct a yearly assessment of:
 - a. all reports of misconduct (whistleblowing reports) within the scope of Horse activities submitted over the last year;

- b. notified doubts and questions related to the meaning of a specific rule or rules of conduct specified in the Code or any other policy or procedure which is relevant to compliance with the principles and values expressed in the Code;
 - c. any irregularities occurring within Horse's operational processes, disclosed in a manner other than by means of whistleblowing reports.
- 10. The assessment also identifies the root-causes of irregularities.
- 11. The conclusions of the assessment together with proposals, if necessary, of any amendments to the contents of the Code or the implementation of other measures that will enable the more effective application of the Code , are presented to the EPP Management Board.
- 12. The Director of the Legal Department is also responsible for ascertaining the need to amend the Code in the event of changes in the applicable law or social, political, economic and environmental circumstances.