

Aligned
Real Estate Investment Trust Plc

Anti-Discrimination, Harassment, Bullying and Violence Policy

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1. Introduction

This Anti-Discrimination, Harassment, Bullying and Violence Policy (the "Policy") outlines the ethical principles that should guide all employees of the Aligned Real Estate Investment Trust PLC and its subsidiaries and controlled entities (collectively, "ALIGNED") in their daily work. For this Policy, any reference to "employees" includes any director, senior management, officer or employee of ALIGNED.

ALIGNED is dedicated to treating every employee with respect and dignity, fostering an inclusive workplace that values diversity. We unequivocally condemn any form of bullying, discrimination, violence, or harassment based on factors such as gender, race, colour, religion, disability, political opinion, sexual orientation, national origin, trade union membership, or any other status protected by international law and accepted global standards.

Discrimination, harassment, violence, bullying, and retaliation have no place in ALIGNED's culture. Every employee has the right to work in an environment free from prejudice, bias, offensive behaviour, and inappropriate conduct. These behaviours not only harm the individual affected but also negatively impact morale, confidence, competence, and overall performance. Moreover, they can tarnish ALIGNED's reputation and create legal risks for both employees and ALIGNED.

ALIGNED, is committed to upholding human rights standards and adopting consistent policies applicable to all our workplaces. Even when our policies may exceed local legal requirements, we expect all employees to adhere to these standards. If you have any doubts or questions, please seek guidance from your manager.

This Policy should be used in conjunction with our Code of Business Conduct and Ethics.

2. Roles and Responsibilities

All employees have a personal responsibility to familiarize themselves with and uphold the standards outlined in this Policy. We expect every employee to actively oppose and report incidents of harassment, violence, discrimination, and bullying. In situations where it is safe to do so, employees are encouraged to support victims and promptly address instances of harassment, violence, discrimination, and bullying.

Our senior management plays a crucial role in preventing and reporting harassment, violence, bullying, and discrimination. They are also expected to take appropriate action, when safe, to halt such behaviour when it occurs. We place great importance on our senior management leading by example and demonstrating inclusive behaviour. They should understand that their actions, their words, their willingness to challenge, and their willingness to accept certain behaviours often set the tone for the employees they lead.

3. Purpose and Objective

The purpose of this Policy is to:

- Establish minimum standards of behaviour for all our employees, creating an inclusive environment that is free from harassment, violence, discrimination, bullying, and retaliation at ALIGNED.
- Clarify employees' responsibilities in upholding the established standards within our work environment.

Provide employees with guidance on the appropriate steps to take should they need to report a violation of this Policy.

4. Scope

ALIGNED is committed to a workplace that is free from unlawful discrimination and harassment, including sexual harassment, discriminatory harassment, bullying, and retaliation, all of which are prohibited by both law and ALIGNED policies. This Policy aims to prohibit any improper or unlawful discrimination and harassment within the work environment, regardless of the location, including but not limited to ALIGNED premises, client sites, business trips, company-sponsored or client-sponsored events, and the use of ALIGNED resources, such as electronic mail, voicemail, the Internet, and social media. ALIGNED employees are expected to refrain from unlawful discrimination and harassment, even outside of the workplace.

This Policy applies to all ALIGNED employees, ALIGNED entities, controlled and non-controlled joint ventures, and third parties working on our behalf. It should be used in conjunction with ALIGNED's Code of Business Conduct and Ethics.

The Policy includes:

- ALIGNED's expectations for employees and third parties
- Definitions of discrimination, harassment, violence, bullying, and retaliation
- Procedures for addressing and mitigating policy breaches

This Policy sets minimum standards for our employees. Please note that local policies should complement this Policy and may offer specific definitions and procedures based on local legislation. In cases where local legislation sets higher standards than this Policy, employees should adhere to both local legislation and this Policy. For ALIGNED locations where legislation does not cover discrimination, harassment, retaliation, and bullying, this Policy should be followed.

5. Definitions

Harassment

At ALIGNED, harassment encompasses any improper, inappropriate, or unwelcome behaviour that could reasonably be expected to cause offence or humiliation to another person. This includes actions, words, or gestures that may annoy, alarm, abuse, demean, intimidate, belittle, humiliate, or embarrass someone or create an intimidating, hostile, or offensive work environment.

Sexual Harassment

At ALIGNED, sexual harassment includes unwelcome or uninvited behaviour of a sexual nature that is offensive, embarrassing, intimidating, or humiliating. It can be experienced by anyone. Specific examples of sexual harassment include but are not limited to:

- Use of coercive sexual behaviour
- Offensive behaviour that humiliates another person due to their sex
- Requests or demands of a sexual nature
- Verbal and non-verbal harassment, such as offensive jokes, publications, or comments
- Continual suggestions for dating or romance after it's been made clear that these suggestions are unwelcome
- Unwelcome physical contact of a sexual nature, ranging from unnecessary touching to sexual assault.

Race, Ethnicity, or National-Origin Based Harassment

At ALIGNED, race, ethnicity, or national-origin-based harassment and discrimination encompass behaviour that intimidates, humiliates, ridicules, or undermines the confidence of a person due to their race, ethnicity, colour, nationality, or ethnic/national origin. Specific examples of racial harassment include but are not limited to:

- Verbal comments, jokes, and innuendo perceived as offensive
- Rude or offensive gestures, interrogation, or teasing about race or customs
- Display of racially abusive slogans, pictures, objects, or publications
- Visible exclusion of a minority race in a group gathering.

Violence

In the context of the workplace, "violence and harassment" refer to a range of unacceptable behaviours, threats, or practices, whether singular or repeated, aiming at, resulting in, or likely to result in physical, psychological, sexual, or economic harm. This definition includes gender-based violence and harassment. "Gender-based violence and harassment" refer to violence and harassment directed at individuals because of their sex or gender, or disproportionately affecting individuals of a particular sex or gender. This category includes sexual harassment.

Bullying

At ALIGNED, bullying encompasses behaviour that mistreats others and causes either physical or emotional harm. Bullying can take various forms, including verbal, non-verbal, psychological, and physical humiliation. Examples of bullying and harassment can range from extreme cases like violence to less overt behaviours such as ignoring someone. Harassment or bullying can be direct (face-to-face) or indirect (via voicemail, text, messaging, or email). Specific examples may include, but are not limited to:

- Offensive posters, symbols, or gestures
- Exclusion, such as non-cooperation or ignoring someone
- Inappropriate jokes, language, or slander
- Stalking someone
- Unwelcome physical contact (pushing, shoving, kicking, poking, tripping, damage to a person’s work area or property)

- Unsubstantiated, persistent criticism
- Unwelcome or inappropriate remarks about someone's religion, race, marital/civil status, or appearance
- Shouting at or being sarcastic towards individuals
- Physical or psychological assault or threats
- Abuse of power by those in positions of authority
- Public humiliation.

Discrimination

At ALIGNED, discrimination includes treating one person or group less fairly or less well than others, based on characteristics such as ethnicity/race, color, gender/sex, disability, age, religion, political opinion, nationality, sexual orientation, HIV status, or social origin, among others.

Retaliation

For the purposes of this Policy, ALIGNED defines retaliation as treating a person less favourably than others because that person has lodged a good-faith complaint alleging a violation of ALIGNED's Code of Business Conduct and Ethics. Such complaints may pertain to instances of violence, bullying, discrimination, or harassment. Retaliation can also encompass treating a person less favourably because they have supported someone in making a good-faith complaint or provided evidence related to the complaint. Examples of retaliation may include but are not limited to, isolating or ignoring someone because they have made a good-faith complaint or supported another individual in making a complaint.

6. Breaches

We recognize that it can be challenging to raise sensitive and hurtful issues, but we strongly encourage anyone who has experienced or witnessed behaviour that breaches the standards outlined in this Policy to report it using the methods described below under "Reporting Breaches." We all share the responsibility to uphold the standards set out in this Policy.

Our Commitment

- Treating breaches of this Policy seriously.
- Handling complaints promptly and with care.
- Maintaining confidentiality to the extent possible while conducting investigations. Information will only be disclosed to authorized personnel or authorities as necessary to ensure a fair investigation. Unless there is a legal requirement to the contrary, the reporter/reporting party will be notified if and when their information is disclosed to authorized personnel or authorities.
- Objectively and fairly treating all parties involved.
- Safeguarding the dignity, safety, and privacy of all parties involved.
- Taking appropriate action, where relevant, to stop the reported behaviour.
- Implementing appropriate disciplinary measures, where relevant, against the perpetrator.
- Providing appropriate redress for the victim.

Non-Intent Consideration

It's important to note that the intent of a person who has engaged in discriminatory, harassing, victimizing, bullying, or violent behaviour is not a decisive factor when assessing a breach. This Policy aims to ensure that reports and investigations are handled in ways that are inclusive, fair, gender-sensitive, and supportive of human rights. If you have any doubts about whether a breach has occurred or need guidance in making a decision, please seek advice from your senior manager.

Channels for Reporting Breaches

Any employee who has experienced or witnessed behaviour that breaches this Policy should report the incident using one of the following channels:

- Senior manager: who should then coordinate with any member of the Directors unless one of the Directors is the subject of the complaint.
- Employee representatives/health and safety representatives.

If you prefer not to use the above channels, you have the option to report directly or anonymously using our Whistle-blower Policy. For more information on how to utilize this reporting method, please refer to the Whistle-blower Policy**.**

Reporting Through Senior Management

When you report an incident through senior management, here's what you can expect:

1. Confidentiality: Senior management will treat all complaints as confidential to ensure a fair, complete, and accurate investigation. They will act swiftly and discreetly.
2. Information Gathering: They may ask for further details, such as:
    - When the incident(s) happened.
    - The name of the alleged perpetrator.
    - A description of what happened.
    - Whether there were witnesses.
    - Any actions you took in response.
    - Any other information that can help them understand the issue better.
3. Sensitive Handling: When further investigation is required, it will be managed with consideration for the sensitivities related to the victim and the case.
4. Possible Disciplinary Action: If a thorough investigation finds that another employee, manager, or third party engaged in behaviours that constitute harassment, violence, bullying, discrimination, or retaliation, it constitutes a breach of this Policy. Disciplinary actions may include, but are not limited to:
    - Mediation.
    - Training, counselling, or coaching.
    - Written warnings.
    - Changes to position (demotion, internal transfer, etc.).
    - Termination of employment.
5. Proportionate Redress: The redress and remedy will be proportionate to the harm experienced.
6. Legal Compliance: Legislation and relevant collective agreements will always be respected.
7. Reporting Obligations: In some instances, ALIGNED has a legal obligation to report breaches to the appropriate enforcement authorities. If legislation has been violated,

ALIGNED will report and cooperate fully with appropriate authorities according to the legislation.

8. Accountability: Any individual who has condoned, participated in, authorized, or concealed actions that breach this Policy will also be subject to disciplinary action.
9. Support for the Victim: Depending on the situation and the victim's wishes, the victim may be offered an internal transfer or psychological counselling, to the extent that it is reasonably possible.

7. Administration of the Policy

The Directors and the Manager of ALIGNED are responsible for continuously, no less frequently than annually, monitoring compliance with the Policy, regularly assessing its adequacy, and interpreting the Policy in any particular situation. The Directors actively maintain the Policy by approving amendments that administrate any changes to the Policy as required from time to time.

Any waiver of a provision of this Policy, directors or officers may be made only by the Directors of ALIGNED and will be promptly disclosed to the public as required by law or regulation.