

Responsible Supply Chain and Procurement Policy

Why It Matters

The purpose of this policy is to describe how Avanath works with procurement and supply chain related issues. We are a signatory of the United Nations Principles for Responsible Investment and as such commit our organization to meet fundamental responsibilities in environmental, social and corporate governance factors into our investment practices. Avanath Capital requires its suppliers and its subcontractors to comply with this policy when doing business with Avanath Capital. We encourage our Suppliers to engage in constructive dialogue with us regarding this policy.

What's Expected

This policy applies to all Avanath Capital's suppliers, defined as providers of goods and services to Avanath Capital under a contractual agreement that includes suppliers, subcontractors and service providers. We expect our suppliers to consider the requirements listed below as being applicable to other members of their supply chain.

How It's Done

Laws and Regulations

Suppliers are required to comply with all applicable laws, rules and regulations where they operate. Avanath Capital expects suppliers to meet the more stringent requirements between this policy and applicable laws and regulations.

Human Rights and Labor Rights

- Avanath Capital expects its Suppliers to respect internationally recognized human rights and not cause, contribute to, or be linked with any negative impact on human rights through their business operations.

Child Labor

- Suppliers should not participate in or benefit from any form of child labor. No children below minimum age of employment or below the age for completing compulsory education in their country should be employed by Suppliers. No workers under the age of 18 shall be employed by Suppliers to perform any work defined as hazardous in national law.

Forced or Compulsory Labor

- Suppliers shall not participate in or benefit from any form of forced labor, including such practices as the unlawful or illegitimate withholding of wages. Suppliers shall not allow any practice that would restrict the free movement of employees.

Working Hours

- Suppliers shall ensure compliance with applicable laws and regulations or relevant collective agreements with regards to working hours.

Working Environment

- The work environment must comply with laws and agreements while remaining safe and sound from physical, mental, and social perspective. Suppliers will work systematically and proactively to continuously improve employees' work environment and health.
- We encourage all Suppliers to provide accident or liability insurance to their employees to prevent any financial hardships related to the occupational accidents.
- Employees will be informed about any possible health risks that the work may entail. Employees will receive training on the possible health risks that the work may entail, including fire safety, hazardous work and first aid. Essential information is to be readily available in a language that the employees fully understand.

Non-Discrimination & Diversity

- Suppliers shall not practice any form of discrimination in hiring and employment practice. No discrimination is permitted based on gender, national or ethnic origin, age, sexual orientation, and religious faith. Suppliers should also use good faith efforts to ensure, to the maximum extent possible, the fair inclusion of minorities and women in your workforce and, as applicable, in the workforces of each of your supply chain companies.

Environment

Avanath Capital's values are founded on being responsible and assuming a long-term perspective, in which care for the environment plays an important part in Avanath Capital executing its mission of providing "Lifestyles within Reach" to its residents. Energy consumption and environmental risk are continuously assessed for means to lower consumption of energy, water and other resources and reduce respective greenhouse gas emissions. We expect for all Suppliers to do the same.

Environmental Legislation

- Suppliers shall operate in accordance with applicable environmental laws and obtain all required permits and licenses.

Climate and Environmental Impact

- Suppliers will conduct businesses with respect for the environment and comply with current environmental legislation. Suppliers will maintain an effective overview of, and routines for, identifying, measuring, and monitoring their environmental impact and, moreover, will work systematically to continuously improve their environmental performance.

Waste

- Suppliers strive to reduce the amount of waste resulting from their operations, especially relating to hazardous waste. All waste should be handled according to local regulations and best practices and reuse and recycling should be promoted.

Ethics

Data Protection and Confidentiality

- Suppliers shall ensure that all uses of personal data are taken in accordance with applicable laws and regulations. Suppliers are expected to ensure the protection of confidential information received from Avanath Capital, our tenants and others against misuse, theft, fraud, or improper disclosure.

Anti-Corruption and Anti-Bribery

- Suppliers shall conduct their operations with a high level of integrity, and zero-tolerance to any form of bribery or corruption. This includes never seeking to improperly influence or bribe employees, customers, public officials or any other private or public individual or entity. Suppliers shall not offer or accept any benefits or other means to obtain any undue or improper advantage.

Conflict of Interest

- Suppliers shall avoid conflicts of interest and notify Avanath Capital of any actual or perceived conflict of interest situations in their work with Avanath Capital.

Tools to Help

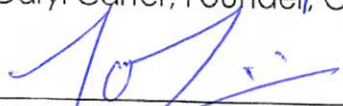
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Policy Approval



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