



**GENERAL POLICY FOR CORPORATE SOCIAL  
RESPONSIBILITY**

## 1. Introduction

The Board of Directors of Árima Real Estate SOCIMI, S.A. (the “**Company**”), is the competent body in relation to determining the policies and general strategies of the Company, pursuant to the provisions set out in Article 249 bis of Royal Legislative Decree 1, dated 2 July 2010, which approved the revised text of the Spanish Companies Act (“**Spanish Companies Act**”). Furthermore, Article 5.3.c) of the Board of Directors Regulations assigns it the right to establish and adopt the Company’s corporate social responsibility policy.

By virtue of the foregoing, the Company’s Board of Directors approved this Corporate Social Responsibility Policy (the “**Policy**”) at their meeting on 25 July 2019.

The Company's strategy is based on responsible management, economic efficiency, and a clear focus on the socio-economic development of local communities and areas. Its commitment to ensuring sustainable actions, with the aim of providing added value to both the Company and its stakeholders, forms part of every single aspect of the Company’s value chain.

The Company acts and provides its services in line with its corporate values of quality, trust and commitment to society, and via this Policy, accepts the following as guidelines for the its management and business activity:

- Responsible and sustainable actions.
- Economic efficiency.
- Constant innovation in order to contribute to the sustainable development of local communities.

## 2. Objectives

The Policy's objective is to promote a culture of social responsibility in the Company, one which aims to create value sustainably for the Company, the general public, clients, shareholders and the local communities in which the Company operates. When taking on new investments, the aim is that the Company considers the social benefits they would bring, in terms of job creation and social wealth, always with a long-term outlook based on achieving a better future, without compromising the Company's current financial results. The Policy must:

- Help the Company to achieve its strategic objectives via responsible and sustainable practices.
- Maximise the shared value creation for stakeholders and create long-lasting relationships based on trust and transparency.
- Prevent, minimise and mitigate any possible negative impacts that the Company's business activity may have.

- Generate positive socially responsible effects for society and the surrounding environment.
- Help to improve the reputation of both the Company and its sector.
- Promote responsible principles and practices throughout the Company.

The Policy aims to establish the basic principles and the general framework for managing the CSR practices that the Company is committed to. It also serves as a basis for integrating social responsibility into the business model and the Company's strategy.

### **3. Principles**

In order to achieve the objectives set out, the Company will follow the following general principles:

- Comply with the applicable law in all the countries and territories in which it operates, basing its relationships with the competent authorities in each jurisdiction on loyalty, trust, professionalism, collaboration, reciprocity and good faith.
- Adopt, apply and therefore support the integration of the principles of professional ethics and human values, transparency and sustainability, paying particular attention to human rights, adequate work practices, the environment and the fight against discrimination and corruption.
- Act in accordance with the Company's Corporate Governance guidelines.
- Favour free-market practices, rejecting any type of illegal or fraudulent practice, implementing effective mechanisms for the prevention, detection and sanctioning of any irregularities.
- Adopt advanced corporate governance practices that are in line with the good governance recommendations that are widely accepted in international markets, based on business transparency and mutual trust with stakeholders.
- Promote communication channels and the Company's relationship with its shareholders, investors and employees in order to strike a healthy balance between the company's values and social expectations and adjust, insofar as is possible, the Company's policies and strategies to cater for their interests, concerns and requirements.
- Encourage and contribute to sustainable development through the incorporation of eco-efficiency criteria, the rational use of natural and energy-generating resources and the minimisation of environmental impact and encourage innovation by using the most effective technology when renovating real estate properties.

#### 4. Undertakings to stakeholders

The Company is committed to developing local communities through its business activity and social responsibility strategy, and works to establish strong and long-lasting ties, taking into consideration the interests of its team, its shareholders and financial community, regulatory bodies, clients, the media, the society in general and the environment.

- Shareholders and investors are the Company's main stakeholders. For this reason, the Company works to repay the trust that its shareholders and investors have invested in it, and insofar as is possible, meet their needs and expectations. The Company looks to offer them channels and tools that allow them to become more involved and communicate with the Company, as well as exercise their rights as owners. In this regard, the Company has a Policy for Communication and Contact with Shareholders, Institutional Investors and Proxy Advisors in place.
- Employees: the Company's professionals are a strategic asset; as the success of the Company's sustainability and social objectives, as well as of its economic performance is dependent on them. The Company looks after its employees and offers them a welcoming work environment, it encourages their professional development, offering various training programmes, facilitates a work-life balance that suits each employee and promotes equal opportunities. The Company aims to attract, grow and retain talent and encourages the personal and professional growth of each and every member of its team, including them in its corporate success programme and guaranteeing them a dignified and secure job.
- Clients: the Company has a very client-centric approach. It works to provide a personalised, flexible and constructive management service for its tenants by taking the individual circumstances of each tenant into account in order to build relationships based on trust, and by offering value-add services, thereby ensuring a long-lasting relationship that satisfies both parties.
- The environment: the Company aims to increase the value of its properties, expand its business and maximise the return on capital to its shareholders. It achieves this by actively managing its property portfolio, improving tenant loyalty and optimising cost control. In line with this strategy, the Company is committed to carrying out the refurbishments, re-configuration works and renovations required to achieve the highest operational efficiency, optimise energy consumption and water saving, and also minimise pollution. As a result, the Company not only achieves its business strategy, but also successfully integrates and develops its business with the minimum impact on the environment. It improves the well-being of its tenants, which results in increased productivity, lower operating costs and enables its tenants to meet their sustainability requirements and Corporate Social Responsibility policies.

The Company engages businesses with an acknowledged reputation to certify the environmental footprint of each of its activities as a sign of its commitment to the environment.

- Suppliers: when selecting the suppliers of its materials and services, the Company will choose those that offer the highest quality while also taking account of cost savings. As a consequence, several proposals and quotes will be requested to allow the Company to compare the services in question, their technical quality and the prices offered.
- Local communities: notwithstanding the quality and price parameters mentioned in the preceding point, for the purposes of consolidating the Company's corporate commitment to the local community and contributing to its development, the Company will prioritise the selection of suppliers that belong to this same community when contracting any services.

## **5. Sustainability undertaking**

- As a demonstration of its commitment to the community and stakeholders, when engaging in its business activities the Company aims to apply all of the principles set out in this present Policy, adhering to criteria that meet the highest standards of professional ethics and human values, transparency and sustainability.
- In this regard, all the activities engaged in by the Company shall be performed in an exemplary manner within the corporate environment, with the aim of creating value for the community and stakeholder groups through the pursuit of the following priorities:
  - Promoting a corporate social responsibility culture within the Company.
  - Reaffirming the Company's commitment to the protection of the environment, through the establishment of measures for the efficient use of natural resources, energy certificates for the assets in its portfolio, etc.
  - Reinforcing awareness and guaranteeing a commitment to respect for and compliance with the regulations governing health and safety in the workplace and the employment rights of its workers.
  - Demonstrating the Company's commitment to respect for individuals, encouraging policies for professional growth.
  - Increasing the transparency of the information passed on to stakeholder groups.
  - Establishing internal mechanisms and systems for the detection and analysis of risk within the framework of the Company's activities.

## **6. Supervisory mechanisms**

The Company has mechanisms for the identification of specific risks within the framework of its activities, and it ensures their proper management through the establishment of a Risk Management System.

For this reason, the Company undertakes to implement an internal monitoring structure that will guarantee due care in the prevention of illegal conduct and acts that are contrary to the law in the Company's business activities. The Board of Directors shall ensure compliance with and implementation of its Corporate Social Responsibility Policy, with particular emphasis on: (i) reviewing and approving Company Policy; (ii) monitoring strategy and implementing this Policy, and assessing levels of compliance; (iii) monitoring and evaluating the company's interaction with its stakeholder groups; (iv) identifying and assessing the Company's non-financial risks, including all operational, technological, legal, social, environmental, political and reputational risk; (v) developing processes for the internal and external communication of non-financial information and information on diversity, pursuant to the applicable regulations; and (vi) ensuring that all of the Company's employees are aware of and comply with all the relevant codes, policies and other internal regulatory documents.

## **7. Communication channels**

Among the tools that the Company uses to monitor compliance with this Policy, the Company maintains several open channels for communicating and engaging with its stakeholder groups in order to ensure transparent, honest and truthful relations. These include: (i) email; (ii) a telephone helpline; (iii) a corporate website.