

2021

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1 BACKGROUND AND OBJECTIVE

In order to achieve its long-term objectives and deliver on its purpose, NREP seeks to build a team of different complementary personalities, skills and backgrounds that work together in a culture where we value our differences. NREP seeks to be a working environment that enables everyone to unleash their full potential and at the same time be treated fairly, equally and respectfully.

Equal, non-discriminatory and fair treatment is a natural principle and value that permeates all our business activities. NREP has since inception diligently focused on building a working environment and culture that is characterized by caring, equality, diversity and respect, and that is free from oppression, discrimination, harassment and bullying.

The purpose of this policy is to outline our principles for how we provide equality and fairness for all employees and avoid unlawful and unfair discrimination. NREP is committed to ensure compliance with local labor legislations in NREP's countries of operation.

This policy applies to all employees. NREP employees are expected to apply the principles and objectives of this policy also outside of work.

The provisions of this policy are subject to compliance with applicable legal requirements in NREP's countries of operation.

2 NREP'S COMMITMENT

NREP is committed to:

- Create an environment in which individual differences are valued and contributions of all types of employees are recognized;
- Encourage a working environment that promotes equality and diversity by providing equal opportunity for employment, training, advancement and development;
- Give full and proper consideration to people with different abilities (i.e. disabled people) during recruitment process and employment through necessary work environment adjustments;
- Treat our customers, partners, investors, tenants, service providers, suppliers and colleagues fairly and with respect;
- Never discriminate employment or remuneration because of race, colour, religion, sex, political
 opinion, national extraction, social origin or any other attribute which bears no relation to the
 job performed;
- Seek to provide solutions for work conditions that are compatible with parenthood; and

 Never tolerate intimidation, bullying or harassment, whether direct, indirect, associative or by perception.

3 NREP's Responsibilities

- NREP informs all employees of this policy at time of onboarding and annually on an ongoing basis
 in order to ensure that NREP as a firm meets both its legal obligations as well as its moral
 obligations within the areas of equal treatment;
- All employees are subject to the provisions of this policy and have a shared responsibility for
 promoting and maintaining a working environment that complies with the objectives of this
 policy. Managers and senior staff hold the additional responsibility of ensuring the policy is
 promoted and maintained within their teams. Managers are responsible for informing all new
 staff of this policy and ensuring new staff understand the content of this policy; and
- NREP informs all employees that action will be taken in case of non-compliance with this policy.
 Behavior, actions or words that breach the policy will not be tolerated and will be acted on.
 Breach of this policy will be treated as misconduct and may lead to disciplinary action, including potential dismissal.

4 RAISING CONCERNS

Employees that feel they have been treated in a way that violates the principles and objectives of this policy should discuss such concerns with their line managers, who is responsible for seeking to address the situation. If employees feel that they are unable to approach the line manager, they should contact the HR team. All complaints will be taken seriously, dealt with confidentially and may require an investigation to be carried out. A sensitive approach will always be taken to prevent the possible victimization of people involved in any complaint.

Please refer to the Complaints Handling Policy and to the Whistleblowing Policy if needed.

5 ARCHIVING AND DOCUMENTATION

All analysis and controls should be documented and archived in such a way that they are easily available to NREP's Management, internal and external auditors as well as other stakeholders, such as the FSA. The documents should be archived electronically for a period of at least 5 years unless relevant legislation requires a shorter or a longer period of time.

In case of any question please contact: compliance@nrep.com

This policy will be subject to ongoing review.

Author	Legal Basis	Amended	Date	Version
Gustaf Lilliehook			10-12-2019	1.0
Marco Lippi		Annual review	10-12-2020	