



SIRIUS REAL ESTATE LIMITED **(the “Company” or “Sirius Group”)**

CORPORATE SOCIAL RESPONSIBILITY POLICY (“CSR”)

The policy applies to the Sirius Group (the Company and its subsidiaries regardless of location) and can be defined as the integration of business operations and values, whereby the interests of all stakeholders including investors, tenants and suppliers, officers and employees, the community and the environment are reflected in the Sirius Group’s policies and actions.

GROUP CSR COMMITMENTS

Employees and People

The Sirius Group has a responsibility to protect, support and help develop employees. Sirius’ role as an employer is to help support and develop individuals and help them with their career development, as well as providing a supportive and open working environment. Efforts are focused on providing career opportunities and resources to the Sirius Group workforce in a wide range of areas including real estate, workplace safety, health and wellness, functional expertise, diversity and inclusion, as well as encouraging training from within from the Sirius Academy as well as development through external means for a small number of long serving employees. The Sirius Group is committed to providing equal employment opportunities and the protection of the rights of the employees. The German operating company is a member of the German Governments programme of diversity and as such all of our employees are specifically trained and tested in terms of the meaning and context of diversity within the working environment.

Ethics & Transparency

The Sirius Group is committed to conducting themselves in a legal, open, ethical and trustworthy manner upholding and meeting its regulatory obligations as well as the obligations of the operating company under German law, as well as treating their business counterparts in an honest and respectful manner.

The Sirius Group recognises the importance of protecting its human, financial, physical, informational, social, environmental and reputational assets. In order to do this the Group sets out specific individual policies. Our top 30 managers are measured and developed against a framework of behavioural competencies all of which is backed up by the



SIRIUS REAL ESTATE LIMITED **(the “Company” or “Sirius Group”)**

leadership and example set by the directors of the German operating company.

The Sirius Group ensures that contracts with tenants and suppliers clearly set out the agreed terms, conditions and basis for their relationships under German and Dutch law and any issues arising from those commercial arrangements are handled in as constructive and respectful a manner as possible.

Engagement

Projects are undertaken in support of community and sporting events and the sponsorship of an international exchange program. Employees are encouraged to take part in a wide range of different events and initiatives.

Environmental

All employees, tenants and suppliers are responsible and accountable for contributing to a safe working environment, for fostering safe working attitudes, and for operating in an environmentally responsible manner.

The Sirius Group, in acquiring and upgrading older light industrial sites, endeavours to improve energy efficiency of its buildings, recycle and enhance unused space, as well as follow best practice with regards to health and safety, fire safety and recycling, ensuring that all of its legal obligations are met and an improved environment is created for its tenants and on site workforce.

When acquiring sites, considerable environmental due diligence is undertaken by the acquisitions team, and any required environmental rehabilitation is overseen after acquisition by our [] team and site managers.



SIRIUS REAL ESTATE LIMITED **(the “Company” or “Sirius Group”)**

Governance

The Board of Directors ethically and effectively leads the Sirius Group through the execution of its roles and responsibilities, including agreeing and overseeing strategic direction. The Board is responsible for overseeing the Sirius Group and holding the executive directors and senior management to account in a range of areas including financial performance, culture, and control of risk, legal and regulatory obligations and protecting the interests of its shareholders. The Board is required to comply with the regulations imposed by the UK Listing Authority, the Board of the Johannesburg Stock Exchange and the Governance Codes imposed by those authorities, as well as the accounting requirements for companies listed on the London and South African premium/main board exchanges.

REVIEW OF THE POLICY

The Committee will review the Policy annually, which will include an assessment of the effectiveness of the Policy.

The Committee will also discuss any revisions that may be required and recommend any revisions to the board.

Date approved: 29 March 2019

Approved by: The Social & Ethics Committee

Last date revised: 29 March 2019