



MULTI



CODE OF CONDUCT
Version 2018



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1 | Governance

This Code of Conduct is issued for implementation within all companies belonging to Multi Corporation B.V. (“Multi”) and is available and applies to all directors, employees and other persons employed or contracted by Multi (“Workers”). Ethical behaviour is an integral part of managing our business by which Multi can maintain a reputation as a reliable and responsible business partner. All Workers are expected to conduct themselves in the execution of their professional activities in line with this Code of Conduct. The Board of Directors undertakes to respectfully treat and allow its Workers to comply with, and give substance to, this Code of Conduct.

2 | Fairness to business partners, competitors and other stakeholders

Each Worker, in the execution of its professional activities on behalf of Multi, shall deal fairly and trustworthily with business partners, competitors and other stakeholders. No unfair advantage shall be taken through manipulation, concealment, abuse of confidential information or by any other way of unfair dealing.

3 | No conflict of Interest

All Workers must avoid any activity that can lead to a (potential) conflict of interest. A conflict of interest may arise if private activities conflict with the interests of Multi. This includes, but is not limited to, financial interests, shareholdings, investments, dealings with relatives and good friends and non-core activities (remunerated or not) within the real estate industry and business partners of Multi. Each Worker shall report potential conflicts of interest to the responsible senior management whilst informing the Compliance Officer simultaneously.

4 | Anti-bribery

Multi will not tolerate any act of bribery or corruption from any of its Workers and/or its business partners, consultants and agents. This includes, but is not limited to, the promising, giving and acceptance of financial or other advantage to or from our business partners, competitors, stakeholders or government officials¹, other than gifts or favours permitted under the Anti-bribery & Gifts Guideline.

All Workers shall be prohibited from offering or making facilitation payments of any kind, or allow others to make them on behalf of Multi. Facilitation payments are payments aimed at expediting or securing the provision of services or products to which Multi is legally entitled.

5 | Integrity

Multi does not conduct business with others who are connected with illegal and / or unethical activities. Key to our integrity policy is performance of a risk-based third party due diligence on our (potential) business partners and professional advisors as set out further in the Third Party Due Diligence Guideline. Each Worker shall report any reasonable doubt about the integrity of a (potential) business partner and / or the legitimacy of the (contemplated) transaction to the responsible senior management whilst informing the Compliance Officer simultaneously.

¹ Government officials include not just employees of a government, but also agents and employees of state-owned or state-controlled companies and public international organizations

6 | Sexual harassment

Multi will not tolerate and shall take all measures to prevent and sanction any sexual harassment behavior at the workplace. Such behavior is forbidden and can and will be sanctioned. Workers may use all monitoring and compliance mechanisms, e.g. the Speak Up possibility, to inform about such forbidden behavior.

7 | Confidentiality and privacy

Multi respects the privacy of its business partners and stakeholders as well as the confidential nature of the information provided to it by the business partners and other stakeholders, and each Worker shall keep and treat such information confidentially. Confidential information includes all non-public information on Multi, its business and its business partners and stakeholders that might be of use to competitors or harmful to Multi, its business partners and / or stakeholders if disclosed. It also includes the personal data of our business partners and stakeholders. All personal data collected and held by or on behalf of Multi will be processed lawfully and carefully in a way that protects the privacy and rights of individuals.

8 | No insider trading

Insider trading is illegal, may trigger legal penalties, and erodes the confidence of our business partners and stakeholders in the integrity of Multi. All Workers shall be prohibited from trading or encouraging others to trade in shares, securities or other financial instruments based on any unpublished price sensitive information that they have received in the execution of their professional activities on behalf of Multi, either directly or indirectly.

9 | Consistency

Multi recognises that difficult questions with regard to the interpretation of the Code may arise, particularly regarding the need to balance sensibly and sensitively local customs and requirements with global standards and practices. In case of any doubt Workers shall consult their direct manager or the local Compliance Officer. Whilst applying due care, integrity and transparency, Multi will do its utmost to resolve any identified issues in order to be consistent with this Code.

10 | Monitoring compliance

Compliance with this Code of Conduct is an essential element in our business success. Workers are required to follow up the instructions of the Compliance Officer and to co-operate with internal or external investigations under his authority. Assurance of compliance shall be reported each year. Violations of the Code of Conduct or any compliance policy may result in disciplinary actions, while any potentially criminal activity that is discovered shall be notified to the relevant public authorities. Workers are also expected to bring any (suspected) violation of the Code of Conduct forward. Provision has been made for Workers to be able to report in confidence through a Speak Up policy. All allegations of potential violations will receive a fair and comprehensive investigation.

For questions on compliance with this Code of Conduct, please contact the Compliance Officer:

[Head of Legal & Compliance](#)

+31 (0)20 25 88 241

compliance@multi.eu

The Board of Directors of Multi Corporation B.V.

Schedules:

- Guideline Anti-bribery / Payments & Gifts
- Guideline Third Party Due Diligence
- Speak Up policy