



XIOR
STUDENT HOUSING

'23



FAMILY



CODE OF
CONDUCT

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Letter from our founder and CEO

Dear colleagues,

Welcome to Xior, where we are one big team. A family that has grown immensely since I started the company in 2007. We aim to be a family where each coworker, student, investor and partner is respected. Working with students means working for the future. That's why I think it's paramount that we, Xior, set a good example for them.



We are all ambassadors of the Xior family, and how we conduct our business and treat others will continue to contribute to how the world views Xior. Each and every single one of you is personally responsible for supporting our core vision, values and reputation. We therefore empower you to uphold our high standards and make decisions that help us grow even more.

It is important for everyone at Xior to know that our Code is not just a document, but the foundation towards continuing our success. Please take the time to review it, become familiar with it, and ask questions where needed.

Thank you for your continued efforts!

Christian Teunissen - CEO



Our commitments

We operate and act as one “**FAMILY**”, each letter standing for our main principles.

- F** FOCUS ON THE CLIENT
- A** ACT SUSTAINABLY
- M** MOVE AS ONE TEAM
- I** INTEGRITY AND DIVERSITY
- L** LEARN TEACH GROW
- Y** YOU CAN MAKE THE DIFFERENCE

*We act as a family.
We grow as a family.
We are a family.*

How can I help? We will always put the **client first** and keep them in mind when making a decision.

We **care for the planet** and strive to continue to improve our efforts to reduce our climate impact.

We are **one team**, one family. Together we can accomplish so much more.

We **respect each other** and everyone’s differences and contributions. Every employee is valued and respected for who they are.

We learn **together**, we teach together, we grow together.

We know that **every individual is essential** to the success of Xior. Everyone brings their talent & makes an impact on our company.

The essentials

INTENDED USERS

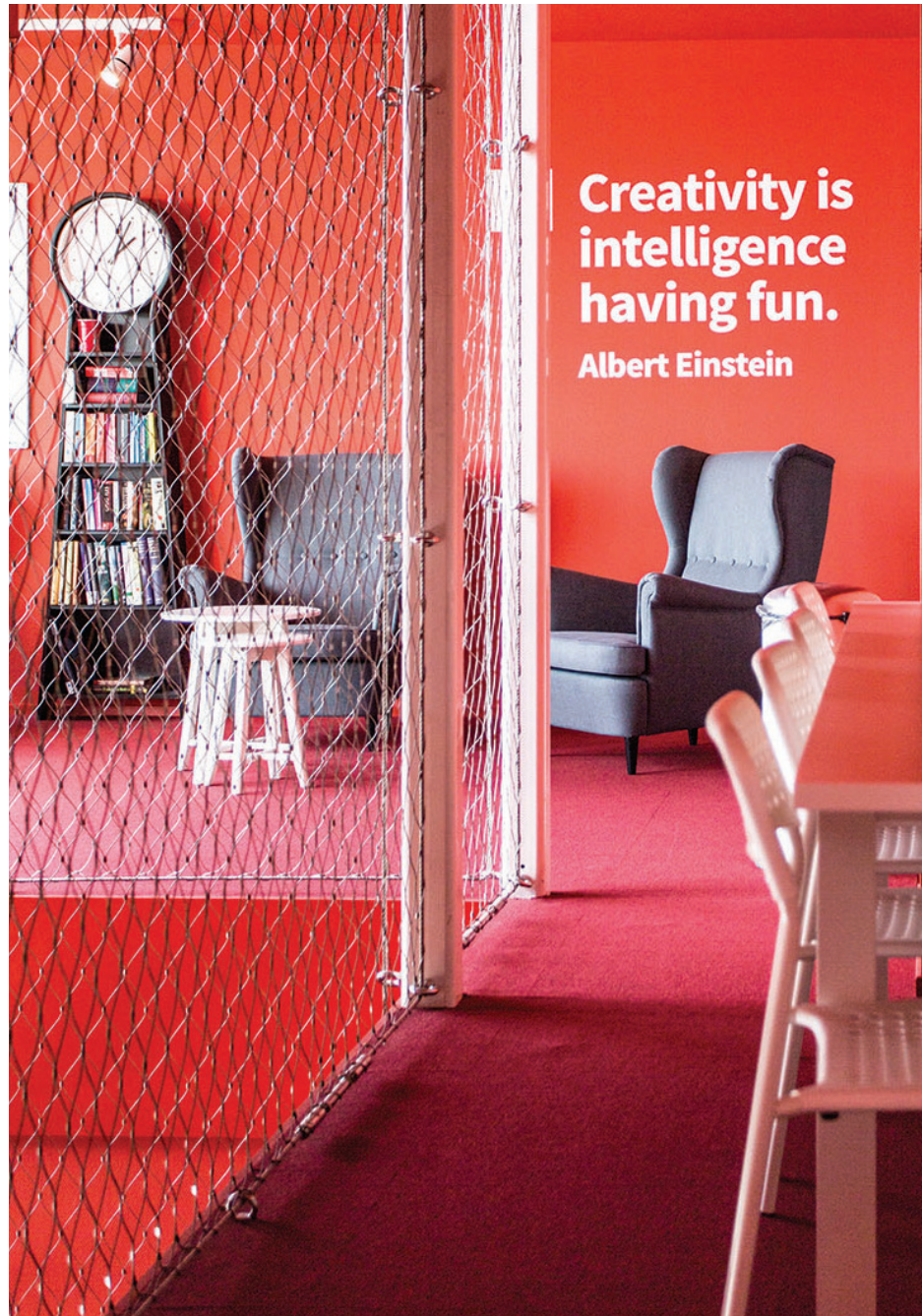
The code applies to any employee, member of executive management or director of Xior as well as any external service provider. We expect everyone who acts on behalf of Xior to live by and respect these principles.

WHERE TO GET HELP OR GUIDANCE

If you feel that our standards are not met, have questions or feedback about the policies, please ask for guidance or voice your concerns by contacting any of the following persons:

- Your Manager
- Human Resources (hr@xior.eu)
- Legal department
- Compliance officer (compliance@xior.be)
- Sustainability manager (ir@xior.be)

All reports will be taken seriously and handled confidentially.



**Creativity is
intelligence
having fun.**

Albert Einstein



Human rights

MUTUAL RESPECT, DIVERSITY & EQUALITY

We are committed to providing a positive and professional working environment in which every person is treated with respect and dignity. We create and promote an environment that is inclusive of all people and their unique abilities, strengths and differences. As we continue to grow, embracing diversity in every aspect of our business is vital to our long-term success. Providing equal employment and equal opportunities to all employees is therefore indispensable for our business.

PROHIBITION OF HARRASSMENT, BULLYING AND DISCRIMINATION

The absence of bullying, harassment and discrimination in our workplace is a fundamental right of all individuals. Discrimination or harassment based on race, gender and/or gender identity, color, religion, age, sexual orientation, disability, sex, national origin or on any other legally prohibited basis is unlawful and undermines the character and purpose of Xior.

We will not tolerate any form of bullying, discrimination, harassment by managers, supervisors, employees, subcontractors, suppliers or clients. We shall take reasonable action to prevent harassment, bullying and discrimination, and, whenever we become aware of such behavior, put an end to it.

PROHIBITION OF FORCED AND CHILD LABOUR

We do not accept or tolerate any form of child, forced or involuntary labour under any circumstances. Xior shall not withhold any part of any worker's salary, benefits, property or documents in order to force an employee to continue working for the company. We expect our suppliers and business partners to respect the same principles.

PROHIBITION OF MODERN SLAVERY

We dissociate ourselves from all forms of slavery, torture, cruel, inhuman or degrading treatment and working conditions that are a threat to life or health. We will assess the implications of business decisions to human rights and seek dialogue with stakeholders in the surrounding world and in the local communities in which we operate.

FREEDOM OF ASSOCIATION

Xior respects the right of employees form and join trade unions and bargain collectively and is committed to an open and constructive dialogue with its employees and workers' representatives. In accordance with local laws, Xior will respect the rights of their employees to associate freely, join labor unions and seek representation.



Our family

CARING FOR AND REWARDING TALENT

We strive to attract and retain the best talents who live and breathe the Xior vision and values. As an international company, we aim to create a healthy mix of different talents, cultures and personalities. We aim to guide and coach our employees, help them grow and reach their personal ambitions by offering them a workplace environment with internal mobility, flexibility and a diverse, challenging and motivating task package. We will provide the members of our family with a competitive package in line with industry standards.

OPEN COMMUNICATION

We are well aware that the best team consists of a wide range of perspectives, skills and abilities. This is why Xior hires employees solely based on their qualities, regardless of race, color, religion, disability, sexual orientation or personality. The company is characterised by a flat organisational structure and a family atmosphere in which initiatives are encouraged and supported and where everyone interacts in open, direct dialogue with regular feedback and evaluation moments. Next to day to day operations, all employees also stay in touch across the four countries through our news flash which highlights the latest news, developments and new members of the family.

We encourage all of our employees to always communicate openly and honestly. If any of our colleagues see behaviour that is not up to standard, we encourage them to report this to their manager or the compliance officer. For more details, see our whistle blower policy on the company website.

OFFERING A SAFE, PLEASANT AND HEALTHY WORK ENVIRONMENT

We are committed to providing an inclusive working environment with mutual trust, which promotes diversity and respect. A flexible environment where every employee feels at home while ensuring a good work-life balance. More information regarding our health & safety practices can be found in our [Health & Safety policy](#) on the company website.

DIGNITY, RESPECT, FAMILY - DO THE RIGHT THING

Every employee will treat each other like family. We encourage our employees to treat each other as they would treat themselves. We expect everyone to maintain our company standards and make decisions that are led by honesty, respect, dignity and integrity. If you are unsure about a certain decision, please ask for guidance.



Acting in Xior's best interest

PROFESSIONAL SECRECY

Xior employees, as well as members of the Board of Directors or Management may not, during the exercise of their professional activities for Xior and after the termination of those activities, use or disclose any information which is not published in official communications, nor information about Xior which they have learned during the performance of their duties. Each of them acknowledges that all economic, financial or real estate studies, client and supplier lists, computer files, accounting data, business proposals, designs and plans of building or equipment, written or verbal instructions regarding Xior's activities, its procedures and its economic and financial situation are confidential.

INSIDER TRADING

As a listed company you may be aware of insider information. Insider information is subject to certain rules, please read these rules in our Dealing Code, published on the company website.

CONFLICTS OF INTEREST

A "*conflict of interest*" arises any time your personal interest interferes with your ability to make an objective, professional decision on behalf of Xior. This can cause a risk to harm the company, which is why we each have a duty to avoid situations that could create, or appear to create a conflict of interest. It is always important to keep the company's interest in mind. Conflicts of interest on behalf of the directors, on transactions of the company with related parties, and functional conflicts of interest are defined in the Corporate Governance Charter available on the company website.

PUBLIC RELEASE OF CORPORATE INFORMATION

Any and all interaction or interviews with the press, analysts and other interested parties may only be approved and facilitated by Xior's executive management or Xior's Investor Relations desk. All corporate publications must be validated by the Investor Relations department and should be in line with Xior's corporate identity.

INTERACTION WITH THE GOVERNMENT

Xior will always work fairly, transparently and constructively with government officials and others in the community. It is against our policy to offer or make a payment or gift of any kind in order to influence a local government official. Please be aware that additional requirements apply when interacting with the government. Always involve the legal department when engaging in for example tenders, bids or negotiations with the government.

TRANSPARENCY AND REPORTING

We commit to always report transparently and unequivocally to all of our stakeholders. We openly provide an overview of all of our financial and sustainable efforts in our Annual Financial Report published on the company website. Additional communication is done through press releases, various publications on our investor relations website and through direct communication with stakeholders during roadshows, conferences,

PROTECTING OUR DATA AND PROPERTY

As we are responsible for sensitive content, all employees must be vigilant regarding the spreading of data and must only share information for business purposes on a need-to-know basis. Lock your computer when you are away from your desk and never share your password. Employees must also handle any materials, equipment or physical property with care.





Our company practices

CUSTOMER CARE: COMFORT, SAFETY & WELL-BEING OF STUDENTS

We attach great importance to the health, safety and well-being of our tenants. Our students are part of our family, and we treat them with the utmost respect, just like we treat our colleagues. We offer them a welcoming, safe and inclusive atmosphere where they completely feel at home and aim to make their time with us the best time they could possibly have as a student. Our buildings meet the highest safety and quality standards and are all equipped with access control and fire safety systems. Every asset undergoes a safety assessment in accordance with the Housing Code as part of the licensing process. This process includes fire safety checks, technical assesment of the lifts, electricity, water quality, ventilation and heating checks, etc. All of our employees must ensure that these safety standards are met at all times.

FAIR BUSINESS PRACTICES

Xior is committed to full compliance with the laws, rules and regulations of the countries in which she operates. All employees must comply with all applicable laws and regulations when performing their duties.

FAIR COMPETITION

Xior will always compete fairly in the marketplace to gain business ethically. We comply with all the applicable competition and antitrust laws in all of the countries in which we operate. It is in the company's best interest to promote free and open competition. We do not accept any anti-competitive behavior as well as any kind of misleading or deceptive conduct.

ANTI-BRIBERY AND ANTI-CORRUPTION

We are committed to act fairly, professionally and with integrity in all of our business dealings and relationships at all times. Xior prohibits all possible forms of bribery, fraud or corruption. All our employees must undertake not to give, offer or promise a benefit or anything of value with the intent to influence anyone in order to obtain or retain business or any business advantage. For our full anti-bribery and anti-corruption policy, [see the seperate policy published in February 2022](#).



Environmental responsibility

“Our color is red but we act green”



Xior respects the environment and works hard towards a portfolio with sustainable, energy efficient buildings, and undertakes the necessary steps to reduce her CO2 emissions. Each member of the Xior family must assist Xior in her environmental efforts in their daily work, by:

- Reducing their consumption of paper, water and lightning;
- Ensuring that materials are recycled or disposed in a responsible manner;
- In their respective functions, by taking environmental targets into account and following the good practices of the company;
- Reporting any risks of pollution and any abnormal discharges or emissions into water or air to the sustainability manager.

SUSTAINABILITY COMMITMENTS

Xior reports on her environmental impact every year through her Annual Financial Report. To see an overview of our sustainability efforts, see Chapter 9 of our Annual Financial Report.

As of 25 May 2022, Xior's CO2 reduction targets have been officially validated by [SBTi](#). This way, Xior aligns with the goals of the Paris Agreement, with the aim of limiting global warming to 1.5°C. Moreover, Xior commits to become net zero carbon by 2050. For more information, see the 2023 Half Yearly Financial Report.

To further monitor our environmental performance and increase energy efficiency, Xior started with the roll-out of an energy monitoring system in 2022. Digital monitoring systems are installed to easily monitor and manage consumption.

STAKEHOLDER COMMITMENTS

Xior also aims to engage and consult with all of her stakeholders regarding the environment. Examples of this are: awareness campaigns for students, our separate [supplier code of conduct](#) and our green building framework, the latter as a blueprint for contractors to ensure our new constructions or major renovations are in line with the latest sustainability standards.

CHARITY

Xior is engaged with several local communities and charities and will continue to consider opportunities which can make a difference on an ongoing basis.

QUALITY & INNOVATION OF BUILDINGS

We aim to create efficient buildings that facilitate happy students. Our commitment to the quality and innovation of buildings means that we constantly evaluate and re-evaluate our portfolio, looking for opportunities to optimise them and reduce their impact on the environment.



Legal Compliance

CONFIDENTIALITY AND DATA PROTECTION

Confidential information is one of our most valuable assets. Protecting any confidential and sensitive information is essential to our company. This commitment applies equally to information about our company, our employees, our clients and our business partners.

During the course of employment, all employees gain knowledge and information that is non-public and belongs to Xior. Employees are trusted with maintaining the confidentiality of this valuable information. Any information related to an identified or identifiable person must be collected and processed in compliance with applicable data privacy laws (e.g. EU General Data Protection Regulation). Our employees with access to such personal data are expected to apply the privacy principles of lawful, fair and transparent data processing, respecting any purpose limitations, as well as the principles of data minimization, accuracy, storage limitation, integrity and confidentiality. As the protection of personal data of our clients and other stakeholders is very important to us, we regularly organize training courses for our employees to create awareness of data protection.

INTELLECTUAL PROPERTY

We are fully aware that our intellectual property is a valuable asset and an essential management resource supporting our business activities and the confidence our customers place in us. We will make every effort to obtain and maintain all necessary intellectual property rights, including patents, copyrights and trademarks, and utilize them effectively in growing our business. We recognize that the knowledge and know-how held by each employee gives us a competitive edge in our business activities.

We are also committed to respect the intellectual property rights of third parties. We expect that all our employees take the intellectual property rights of third parties into due consideration in their daily work.

INTERNAL NOTIFICATION PROCEDURE (WHISTLE BLOWER/GRIEVANCE POLICY)

Xior encourages its Employees to discuss Irregularities or grievances with their manager (for employees) or another confidant. However, an employee may not always feel comfortable reporting or discussing Irregularities with their supervisor or a confidant. Xior therefore has an internal procedure to report issues in an atmosphere of trust. This policy means that employees and collaborators who file grievances can do so in an atmosphere of trust, be assured that such grievances will be treated promptly and independently and subject to non-retaliation provisions. On the other hand, the policy also clearly sets out the rights of employees/collaborators who are the subject of filed grievances. This policy can be found on the [company website](#).



FAMILY

Focus on the client. Act sustainably. Move as one team.

Integrity & Diversity. Learn Teach Grow. You can make the difference.

Keep in touch with us via

