

SUPPLIER CODE OF CONDUCT



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1. Purpose of the Supplier's Code

Xior's suppliers, subcontractors, external service providers and other business partners (the "Suppliers") are important actors allowing Xior to serve all of its stakeholders.

Therefore, Xior is committed to work with Suppliers who share the same principles of sustainability and ethical behavior as Xior itself. Xior requires all Suppliers to commit to responsible business practices and sustainable development as a condition of doing business with us.

This code sets standards for ethical and fair business conduct and describes how Xior expects its Suppliers to treat people, conduct business and improve the environment in cooperation with other parties (*the "Supplier's Code of Conduct" or the "Supplier's Code"*).




2. Xior's Values

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

- F** **Focus on the client.**
How can I help? We will always put the **client first** and keep them in mind when making a decision.
- A** **Act sustainably.**
We **care for the planet** and strive to continue to improve our efforts to reduce our climate impact.
- M** **Move as one team.**
We are **one team**, one family. Together we can accomplish so much more.
- I** **Integrity & Diversity.**
We **respect each other** and everyone's differences and contributions. Every employee is valued and respected for who they are.
- L** **Learn Teach Grow.**
We learn **together**, we teach together, we grow together.
- Y** **You can make the difference.**
We know that **every individual** is essential to the success of Xior. Everyone brings their talent and makes an impact on our company.

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



3. General commitments of the Supplier

All Suppliers have to comply with national laws, regulations and standards applicable in the countries in which the Supplier operates.

Xior expects all Suppliers to respect the minimum standards as set out in this Supplier's Code, implement them using appropriate measures and adhere to them in their business activities.

Moreover, Suppliers should take appropriate measures to ensure that the standards set out in this Supplier's Code are also met by their own supply chain.

4. Principles of the Supplier's Code

4.1 HUMAN RIGHTS

4.1.1 MUTUAL RESPECT, DIVERSITY & EQUALITY

We expect our Suppliers to provide a positive and professional working environment in which every person is treated with respect and dignity.

The Supplier must create and promote an environment that is inclusive of all people and their unique abilities, strengths and differences. Embracing diversity in every aspect of the business and providing equal employment and equal opportunities to all employees must be vital to the Supplier.

4.1.2 PROHIBITION OF (SEXUAL) HARASSMENT, BULLYING AND DISCRIMINATION

The absence of bullying, harassment, and discrimination is a fundamental right of all individuals. Suppliers must prohibit discrimination or harassment based on race, gender and/or gender identity, color, religion, age, sexual orientation, disability, sex, national origin, or any other legally prohibited basis.

Xior applies a strict zero-tolerance policy regarding sexual harassment, whether directed at adults or minors. This includes any unwelcome sexual advances, requests for sexual favors, verbal or physical conduct of a sexual nature, or any other inappropriate behavior. This standard applies not only within the Supplier's own operations but also in all interactions with Xior's tenants, employees, subcontractors, or any third party connected to Xior.

Suppliers are required to take effective measures to prevent harassment, bullying, discrimination, and sexual misconduct of any kind. Whenever a Supplier becomes aware of such behavior, it must act immediately to stop it, take corrective measures, and notify Xior without delay.

4.1.3 PROHIBITION OF FORCED AND CHILD LABOR

Suppliers must not engage in or tolerate any form of child labor, forced labor, or involuntary work under any circumstances. The Supplier 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.

4.1.4 PROHIBITION OF MODERN SLAVERY

We expect our Suppliers to dissociate themselves 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.

4.2 LABOR

4.2.1 HEALTH & SAFETY

The Supplier shall provide its employees with a safe and healthy workplace. The Supplier shall provide adequate and regular training to ensure that employees are educated on health and safety issues. This shall include provision and instructions to use appropriate personal protective equipment.

4.2.2 FAIR WORKING HOURS, WAGES & BENEFITS

Suppliers will comply with all applicable laws on working hours, as well as all applicable laws on wages and benefits. Employment conditions shall be represented to employees in a clear and comprehensive manner, and a fair and reasonable pay shall be provided in accordance with legal requirements with regard to (amongst others) remuneration, holiday, sick leave and parental leave.

4.2.3 PROHIBITION OF ILLEGAL, CLANDESTINE AND UNDECLARED EMPLOYMENT

Our Suppliers are required to comply with all applicable regulations to prevent illegal, clandestine and undeclared employment. Suppliers are committed to comply with their reporting obligations to the administrative, social and tax authorities as provided for in the relevant country. Suppliers are committed to cooperate with subcontractors who comply with these obligations.

4.2.4 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

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

4.3 COMPANY PRACTICES

4.3.1 FAIR COMPETITION

The Supplier must comply with all applicable competition and antitrust laws. The Supplier cannot accept any anti-competitive behavior as well as any kind of misleading or deceptive conduct.

4.3.2 ANTI-BRIBERY, ANTI-CORRUPTION, ANTI-MONEY LAUNDERING

Suppliers must prohibit and actively prevent all forms of bribery, fraud, corruption, and money laundering, in line with applicable laws and international standards. The Supplier will not give, offer or promise a benefit or anything of value with the intent to influence anyone in order to retain business or any business advantage.

4.3.3 CONFLICTS OF INTERESTS

Suppliers will not take advantage of any family, social or political connections to gain advantage within business dealings. Suppliers will thus avoid any interaction with a Xior employee that may conflict, or appear to conflict, with that employee acting in the best interests of Xior.

4.3.4 INTERACTION WITH THE GOVERNMENT

The Supplier will always work fairly, transparently and constructively with government officials and others in the community. The Supplier will prohibit any payment of gift of any kind in order to influence a local government official.

4.3.5 CONFIDENTIALITY OF INFORMATION

Suppliers must protect all confidential and sensitive information obtained through their collaboration with Xior. Such information may only be used for the strict purpose of fulfilling contractual obligations and must be safeguarded with appropriate security measures. Disclosure to third parties is prohibited unless legally required.

4.4 LEGAL COMPLIANCE

4.4.1 DATA PROTECTION

Our suppliers are expected to adhere to all applicable laws and regulations regarding data protection and information security, especially with regard to personal data of their and Xior's customers and employees.

4.4.2 INSIDER TRADING

The Supplier acknowledges that Xior is a listed company and is fully aware that information that it becomes aware of regarding Xior could under certain conditions constitute "inside information" under the Market Abuse Regulation, in which case the Supplier will (and will procure and guarantee that its representatives) duly comply with all legal obligations pertaining to "inside information".

4.4.3 INTELLECTUAL PROPERTY

As intellectual property is a valuable asset and an essential management resource supporting the business activities, we expect our Suppliers to respect the intellectual property rights of Xior and third parties.

4.5 ENVIRONMENTAL RESPONSIBILITY

Xior's commitment to sustainability includes efficient use of resources and respect for the environment. Therefore, Xior expects its Suppliers to conduct business with respect for the environment and comply with all applicable environmental laws, regulations and other provisions.

The Supplier is committed to meet the requirements of relevant legislation in the countries and regions in which it operates.

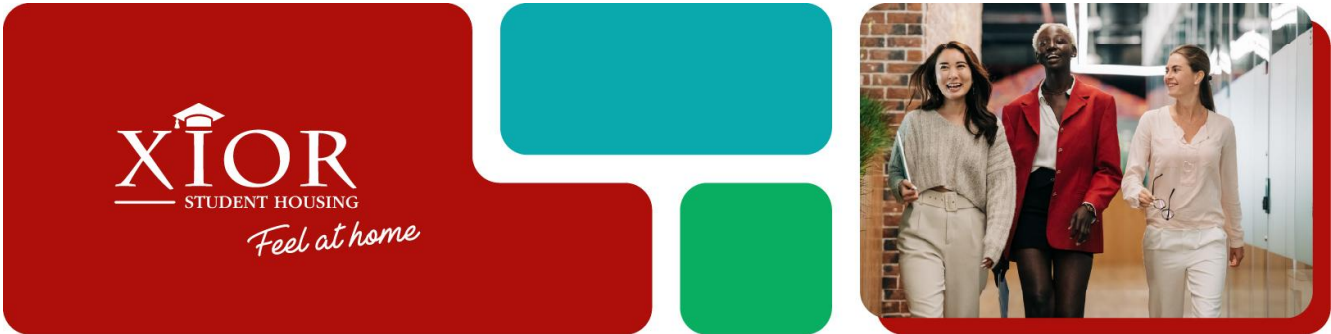
The efficient use of natural resources and energy and reducing continuously the environmental impact of its operations and products through the adoption of sustainable practices, must be a priority to the Supplier.

Xior's commitments regarding sustainability are published on Xior's website and in the Annual Report. Suppliers are expected to support Xior in fulfilling these commitments.

For more information, please contact:

Suppliers who become aware of violations of this Code, including harassment, discrimination, or other misconduct, must immediately report this to Xior.

If you have any questions regarding this policy, please contact our Internal Auditor, audit@xior.eu.



Document control

Current version			
Version	10/2025		
Applicable parties	Xior's suppliers, subcontractors, external service providers and other business partners and every Xior member working with these parties		
Approved on and active as of	20/04/2026		
Approved by	ExCo		
Review date	01/12/2026		
Author / Owner	Internal Audit Manager – Nortwin Dils		
Document monitoring	This policy will be reviewed periodically and revised in line with economic changes.		
Version history			
Version	Date approved	Author	Summary of changes
10/2025			Update section 4.1.2: addition of sexual harassment
03/2023			Publication of first Supplier Code of Conduct