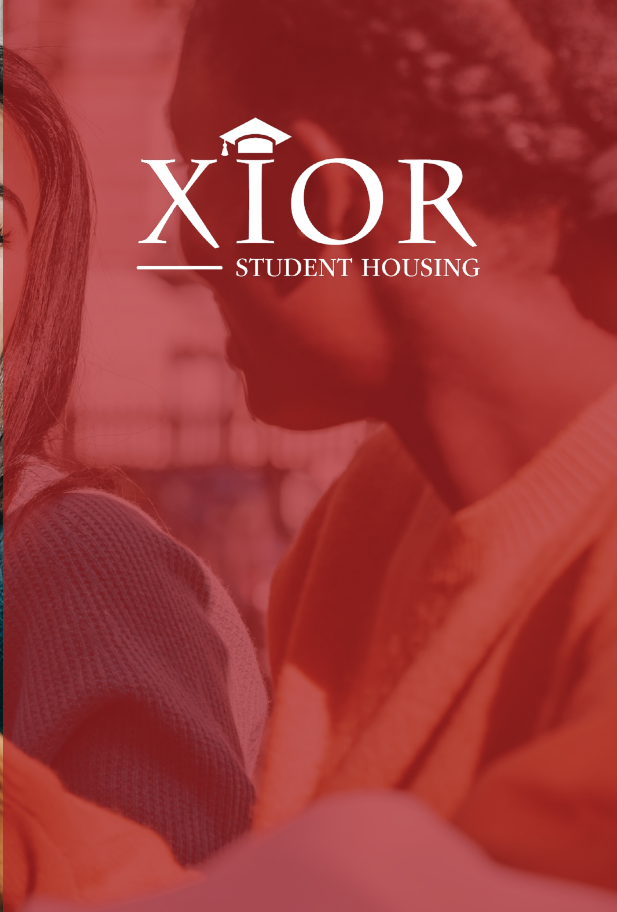
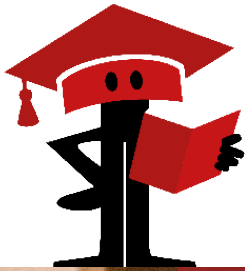




XIOR
— STUDENT HOUSING



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HUMAN RIGHTS
POLICY



Our commitment

Purpose of this policy

This policy sets out our commitment and the steps we take to meet our responsibility in order to respect internationally recognised human rights standards within our company and towards third parties.

As a listed company in real estate, we believe it is crucial to carry out our business activities by respecting the highest ethical and moral standards. Xior is committed at all times to respect the laws and regulations in force, both internationally (i.e. the standards established by the United Nations) and nationally, in every country in which she operates.

The primary objective of this policy is to promote fair and sound human rights practices to all our stakeholders as an employer, as an operator of real estate and as a business partner.

Scope

This policy applies to Xior, all its subsidiary companies, its executives (i.e. members of the board of directors, executive committee and management), its employees, contractors, suppliers, agents and any other third party working with us as part of our operations.





Principles

As an employer

Our employees are crucial to Xior's success. Therefore, Xior is committed to create an environment where every individual can maximize their talent that contributes to the growth of our company.

Below, Xior presents the minimum commitments in terms of human rights and labour practices towards employees:

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 (gender, linguistic, cultural, etc.) in every aspect of our business is vital to our long-term success. We recognize that a diverse workforce brings forth a multitude of unique viewpoints, a wide array of talents, and a wealth of life experiences that enrich our organization. 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 not just unacceptable; it is unlawful and stands in direct contradiction to the core values and purpose of Xior. We will not tolerate any form of bullying, discrimination, harassment by managers, supervisors, employees, subcontractors, suppliers or clients. Our commitment to providing a safe and respectful workplace is unwavering. 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 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 firmly uphold the principle that every employment relationship within our organization must be entirely voluntary in nature. This commitment ensures that each employee is treated with dignity and respect, and their employment is based on their own choices. We expect our suppliers and business partners to respect the same principles. Together, we strive to create a global community of organizations that uphold the values of ethical employment, promoting fairness, respect, and freedom of choice for all individuals.

Xior undertakes to respect the minimum legal age for admission to employment.

We ensure full compliance with applicable wage, work hours, overtime and benefits laws (including but not limited to the laws applicable to the national minimum and living wage). In any event, wages should always be enough to meet the basic needs and provide some discretionary income.



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. Through these dialogues, we aim to gain valuable insights and collaboratively work toward a world that is free from the scourge of modern slavery, ensuring that every individual's rights and well-being are protected and upheld.

FREEDOM OF ASSOCIATION

Xior places a high value on the right of employees to form and join trade unions and to engage in collective bargaining and is committed to maintaining an open and constructive dialogue with its employees and workers' representatives. This approach symbolises Xior's commitment to foster an inclusive and equitable workplace where individuals are free to choose their union affiliation without adverse consequences. In accordance with local laws, Xior will always respect the rights of their employees to associate freely, join labor unions and seek representation.

EMPLOYEE WELL-BEING

At Xior, we hold an ongoing commitment to ensure that the working conditions we offer are designed with the utmost priority placed on the well-being of our employees. We are dedicated to providing a motivating, comfortable working environment that is thoughtfully tailored to accommodate their individual needs by organizing (internal and external) trainings, after work activities, sport events etc.

We believe that when our employees are inspired, supported, and provided with an environment that aligns with their requirements, they can thrive both personally and professionally. Our commitment to their growth and well-being is fundamental to our mission of fostering a workplace that encourages the full potential of each team member.

As an operator of real estate

Xior is the first Belgian public property company specialized in student housing with a real estate portfolio across 8 countries. As owner and operator of student rooms, Xior strives to offer every student a place where they feel at home. The well-being of the students is therefore essential to provide them a place where they can study, live and enjoy their student life under the best conditions.

Mutual respect, diversity and equality are fundamental in our student buildings and are considered to be top priority in the relationship between Xior staff and the students. We do not tolerate any form of harassment, bullying or discrimination among students or in the communication with our staff.

Therefore, every employee of Xior is obliged to report all incidents regarding this policy involving students residing in our facilities.

As a business partner

Xior expects his business partners to respect the same high human rights standards as Xior itself. Xior strives to encourage and support its business partners to work for continuous improvement throughout their business activities.

Therefore, every employee of Xior is obliged to report all incidents regarding this policy involving any business partner to his or her supervisor. This way, we seek to prevent or mitigate adverse human rights impacts at our business partners.





Awareness & preventive measures

This policy is approved and overseen by Xior's management. The executive committee is responsible for ensuring that this policy is implemented and adhered to at each operational workplace and within the various functions and disciplines. The executive committee ensures that this policy is communicated effectively to all employees, contractors, suppliers, agents and any other party working with us as part of our operations. This policy will be reviewed on an annual basis to ensure compliance. The content of this policy will be integrated into the annual code of conduct training for all employees.

This policy shall be reviewed and updated as and when necessary, to reflect changes in relevant legislation and improvements in approach.

Non-compliance with this policy

All incidents regarding this policy must be reported to Xior's management, its internal auditor and the compliance officer of the Company. Breaches of this policy will not be tolerated and may lead to disciplinary and other actions up to and including, for employees, termination of employment and for Business Partners, termination of all commercial relationships with the Company. These actions will result from the investigation conducted by the compliance officer.

If you have noticed a violation of this policy, you can file a report in accordance with the procedure as described in our whistle blower policy: [whistle-blower-policy-en-04-11-2021.pdf \[xior.be\]](#)



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

