



## **Human Rights Policy**

# Human Rights Policy

## Introduction

Care Property Invest is dedicated to fostering an organizational culture that upholds a policy of support for internationally recognized human rights and strives to avoid complicity in human rights abuses. Care Property Invest supports the principles contained within the UN Global Compact, the Universal Declaration of Human Rights and the ILO Core Conventions on Labour Standards and other internationally accepted standards.

In its business practices, Care Property Invest ensures alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs), including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation (ILO) on Fundamental Principles and Rights at Work.

The purpose of this human rights policy is to set forth the core values of Care Property Invest regarding human rights and to outline our commitment in that regard. These values are embedded in management across all functions within Care Property Invest and are also reflected in other policies within the company.

## Scope and applicability

This human rights policy (hereafter the '**Human Rights Policy**') applies to all directors, effective leaders, management, employees, and independent service providers of Care Property Invest, as well as group entities of Care Property Invest.

If a conflict exists between this Human Rights Policy and applicable law, the most stringent standards shall apply.

## Principles

The following topics identify the key human rights priority areas of Care Property Invest.

### I. **Respect for human rights in the working environment**

#### a. **Safe and healthy working environment**

Care Property Invest promotes the well-being of its employees and commits to comply with all applicable health and safety laws, regulations and standards.

Care Property Invest continuously invests in mapping the risks their employees could be exposed to and shall take appropriate prevention measures to avoid these risks, remove their root of cause, or reduce them.

Care Property Invest has appointed a prevention advisor while implementing practices to prevent accidents and injuries. For instance, Care Property Invest provides its employees with training on fire prevention, first aid and AED.

#### b. **Child labour**

Care Property Invest does not tolerate child labor in any form at any stage of its supply chain. Care Property Invest fully respects all applicable laws regarding the minimum age for employment and shall be vigilant of and operate with a zero-tolerance policy on child labour.

#### c. **Elimination of all forms of forced or compulsory labour**

Care Property Invest prohibits every form of forced or compulsory labour and undertakes to refrain from using any form of intimidation in its (employment and/or business) relationships. Employees or other contractors of Care Property Invest will have the right to terminate their employment relationship with proper notice and according to the applicable employment and social laws.

#### **d. Freedom of association and collective bargaining**

Care Property Invest respects the rights of its employees to organize, advocate for, and protect their interests, including the right to collective bargaining.

Care Property Invest safeguards its employees from any form of discrimination, whether in actions or words, that could undermine their ability to organize, engage in trade union activities, or negotiate collectively.

#### **e. Employment laws**

Care Property Invest is committed to comply with all applicable employment regulations in the countries in which it operates. This includes, but is not limited to, laws relating to fair wages, benefits, working hours, the right to de-connect, and working conditions (such as health and safety).

Care Property Invest will facilitate the necessary physical and mental demands for the working place of its employees, enabling to promote their personal development and overall work satisfaction by offering them a motivating, comfortable working environment, adapted to their needs. We believe that investing in the safety and well-being of our employees is a critical component of our success.

#### **f. Diversity, equity and inclusion**

Care Property Invest makes it a point of honour to facilitate a work environment that promotes diversity, equity and inclusion. We prohibit all forms of racism and discrimination, both direct and indirect, and are committed to treat everyone with respect for the dignity, feelings and beliefs of each individual.

Care Property Invest seeks to provide a safe environment for its employees and shall absolutely refrain from all forms of physical, verbal, and written harassment or abuse, and shall make all reasonable arrangements to promote the success and well-being of its employees.

### **II. Respect for human rights when developing and investing in healthcare real estate**

Since there is an increasing demand for healthcare housing for elderly individuals, combined with societal inequality, we strive to meet the need for equal access to healthcare housing by offering customized (real estate) solutions for our care providers, tailored to the needs of the residents.

In the design and construction of these facilities, the well-being of the residents is at the center. We invest in creating living environments that are not only comfortable and accessible, but also responsive to the changing need of the elderly individuals.

Especially in the construction phase and on Care Property Invests construction sites, Care Property Invest attaches great importance to ensuring that its partners comply with all applicable rules and obligations relating to labour and social security legislation, as well as the legislation relating to the health and safety, prevention and welfare of their site personnel. Care Property Invest will therefore take great care to ensure that its partners (whether suppliers, developers, contractors, service providers, etc.), comply with these standards.

### **III. Respect for human rights in the community**

#### **a. Respect for the environment**

Care Property Invest is aware of the impact of the real estate sector on the environment, as the sector accounts for 36% of global energy use and 39% of carbon emissions. Therefore, we have initiated a

sustainability roadmap that outlines specific targets and objectives to guide our efforts with regarding our ESG-commitments<sup>1</sup>, and we commit to annually disclose details of our progress in this regard.

#### **b. Community engagement and building lasting relationships**

We believe in the importance of positive engagement with the communities in which we operate. We therefore aim for making a positive impact and contribution in the areas in which we operate, with a special consideration for those who are vulnerable and may be at higher risk of experiencing negative human rights impacts.

This can include but is not limited to the respect for community culture and values, supporting local initiatives, acting ethically and transparently when interacting with the community, ... For detailed and specific initiatives in this area, we refer to our sustainability report on our website.

#### **c. Link with Supplier Code of Conduct**

We believe that respecting and protecting human rights is essential to maintaining a responsible and ethical business. Therefore, we seek to establish relationships with entities that share the same principles and values as Care Property Invest. Accordingly, we expect our business partners and other relevant external parties (such as our suppliers and operators) to aim for the same level of support and respect as stated in this policy (*e.g. mentioned in the Supplier Code of Conduct*).

### **Compliance and monitoring**

Care Property Invest undertakes to regularly monitor its compliance with this Human Rights Policy. This includes:

- Performing due diligence to ensure human rights compliance, and remediation mechanisms
  - The ongoing due diligence processes entail risk analysis and efficacy monitoring procedures to identify, prevent and mitigate actual and potential adverse human rights impacts, which are horizontally integrated into the enterprise;
- Internal audits: Internal audits will be conducted regularly to ensure compliance with human rights standards. Any deficiencies or violations will be addressed immediately, by providing appropriate remediation measures.
- External audits: Periodic external audits by independent auditors may be conducted to obtain objective evaluations of compliance with this Human Rights Policy.
- Grievance / reporting and complaint mechanism: Employees, suppliers and other stakeholders of Care Property Invest are encouraged to report human rights violations via our Complaints Policy and procedure (<https://carepropertyinvest.be/en/complaints/>).

In addition, the directors and management of Care Property Invest are responsible for promoting and maintaining a culture in which human rights are respected and observed.

They must ensure that Care Property Invests procedures and processes are in line with this policy, e.g. by providing company trainings, by transparent communication (internal and external) about the Human Rights Policy and/or initiatives via Intranet and Care Property Invests website, or by designing relevant business processes to incorporate human rights due diligence and impact assessments etc.

Care Property Invests employees have the responsibility to comply with these policies and are encouraged to report any human rights issues or violations.

#### **Sanctions and consequences in case of non-compliance**

Violations of this Human Rights Policy cannot be tolerated under any circumstances and a zero-tolerance policy will be adopted by Care Property Invest.

In case of violations of this Human Rights Policy, Care Property Invest will take appropriate measures towards the persons concerned, including the possibility of dismissal or termination of the cooperation/commercial relationship, depending on the severity of the offense.

---

<sup>1</sup> <https://carepropertyinvest.be/wp-content/uploads/20240430-cpi-sustainability-policy.pdf>

For the avoidance of doubt, the above sanctions do not in any way affect applicable legal and regulatory provisions, including those contained therein.

This Human Rights Policy will be reviewed periodically and updated, as necessary, to ensure that it continues to comply with current legislation and the sectors' best practices.

### Questions

Any questions or concerns regarding this Policy may be directed to our Compliance Officer, Jan Van Beers ([compliance@carepropertyinvest.be](mailto:compliance@carepropertyinvest.be)).

Latest update: November 2024

More information:

Care Property Invest nv, Public RREC under Belgian Law  
Horstebaan 3, 2900 Schoten, BE 456 378 070 (RPR Antwerp)  
[www.carepropertyinvest.be](http://www.carepropertyinvest.be) - T +32 3 222 94 94 - [info@carepropertyinvest.be](mailto:info@carepropertyinvest.be)