

nexity

Code of ethics

MARCH 2026



CONTENTS

1. **Our commitments** – page 3
2. **Joint provisions** – page 5
3. **Internal relations within the Group** – page 8
 - 3.1. Respect for and protection of individuals – page 8
 - 3.2. Protection and appropriate use of the Group's assets – page 11
 - 3.3. Protection of the Group's image – page 14
 - 3.4. Reliability and accuracy of information – page 15
 - 3.5. Confidentiality – page 16
4. **External relations** – page 18
 - 4.1. Ethical conduct – page 18
 - 4.2. Environment – page 19
 - 4.3. Loyalty to customers – page 20
 - 4.4. Loyalty to shareholders – page 21
 - 4.5. Fair competition – page 22
 - 4.6. Loyalty to business partners – page 24
 - 4.7. Anti-money laundering and combating the financing of terrorism – page 25
 - 4.8. Political activities – page 27
 - 4.9. Enquiries – page 28

1. OUR COMMITMENTS

This Code of Ethics guides all of our day-to-day actions, decisions and behaviour within the Company. By integrating these principles into its corporate culture, Nexity and all controlled subsidiaries (hereinafter "the Group") affirm their commitment to integrity, transparency and accountability.

This Code is to be used as a **fundamental point of reference**, not only to guarantee compliance with applicable laws, but also to preserve the Group's reputation as a responsible player in its sector. Its purpose is to **promote exemplary conduct at all levels**, by encouraging everyone to make informed and ethical decisions.

As such, this Code is not just a set of imposed rules, but rather reflects a **genuine societal choice** to work in an environment where ethics and professional conduct are at the heart of our daily concerns. In the same vein, on 16 June 2025, Nexity group introduced an **Anti-Corruption Code of Conduct**, a key initiative to highlight and strengthen its ethical values.

Thus, the Group not only undertakes to comply with applicable laws and regulations, but is working towards its goal of being an **exemplary group in the eyes of its stakeholders** by equipping itself with the means to prevent and detect any unethical practices.

The Group also follows a strategy of sustainable development in environmental, social and societal areas, which has been integrated within the strategies of the Group's various business lines.

Each employee must represent this strategy in his or her daily conduct.

It is therefore vital that everyone comply with the provisions of this Code and all associated internal procedures; **failure to comply** with the principles set out therein **may lead to disciplinary measures**.

COMPLIANCE WITH THE LAW

Each employee undertakes to comply with the laws of the country in which the Group conducts its business. This commitment enables the Group to maintain its reputation for integrity and transparency in the highly regulated sector in which it operates.

Compliance with **health and safety rules, as well as environmental protection rules**, requires **particular vigilance**.

As part of their duties, all employees must keep abreast of the laws and regulations relevant to their activity and ensure strict compliance with them. Although not everyone is expected to become an expert in the various laws and regulations applicable to their area of expertise, **each employee must nevertheless have enough knowledge to determine when it is necessary to seek the opinion of the relevant support services**.

In order to ensure that employees possess the appropriate level of skills, and legal skills in particular, to carry out their professional duties, **training courses are regularly offered** and available on the intranet (topics covered include ethics, the fight against corruption, GDPR, etc.).

ANTI-CORRUPTION AND INFLUENCE PEDDLING

The Group is firmly committed to fighting corruption and influence peddling and applies a **principle of zero tolerance** to these crimes. As such, the Group's Anti-Corruption Code of Conduct reference document must be complied with in full.

Corruption is any behaviour through which a person **solicits, approves or accepts a donation, an offer or a promise, gifts or benefits of any kind** with a view to performing, delaying or failing to perform an act that falls directly or indirectly **within the scope of his or her duties**.

Attempted corruption is corruption and can lead to disciplinary measures.

Influence peddling is when a person **uses his or her actual or implied position or influence**, in exchange for money or favours, to **influence a public decision**.

In the event that said influence does not lead to an advantageous decision, the offence would nevertheless already have been committed.

2. JOINT PROVISIONS

TO WHOM DOES THE CODE APPLY?

This Code applies to all Group employees and managers in the context of their professional activities.



EMPLOYEES

As an employee, I must:

- Be familiar with and understand the Code of Ethics.
- Act in accordance with the Code and, if in doubt, seek advice from my line manager, my Human Resources Manager, or the Legal Department by writing to: conformite@nexity.fr

LINE MANAGERS

As a line manager, I must:

- Lead by example, implement and promote the Code of Ethics.
- Ensure that my team members comply with the Code of Ethics.
- Ensure that I am sufficiently familiar with the Code of Ethics to be able to advise and guide my team on any issues they may raise.
- Identify risks related to situations of non-compliance and make the right decisions when problems arise in my area of responsibility.

WHAT ARE THE OBJECTIVES?

This Code has been introduced to **guide the actions of all employees and to help them make decisions that comply with the rules of ethics, the Group's values and the law.**

This document does not replace but **complements existing legal and regulatory texts and/or procedures, internal memos and the internal rules and regulations applicable within the Group.**

All of these texts constitute, for all Group employees and in all circumstances, a set of rules to which they must adhere.

It **specifies, by theme, the professional conduct expected and to be promoted** in the context of our work and working relationships.

WHO OVERSEES THE IMPLEMENTATION OF THIS CODE?

The **Human Resources Department** and the **Legal Department** oversee the proper application of this Code.

On a day-to-day basis, **it is the responsibility of each employee to ensure compliance with the principles set out** in this document.

This Code is regularly updated to reflect regulatory and internal changes governing the Group's activity and is always available, in its most recent version, on the dedicated space for employees, accessible *via* [this link](#).

WHAT ARE THE PENALTIES FOR NON-COMPLIANCE?

In the event of non-compliance with the obligations defined in this Code, disciplinary measures and penalties may be applied where appropriate.

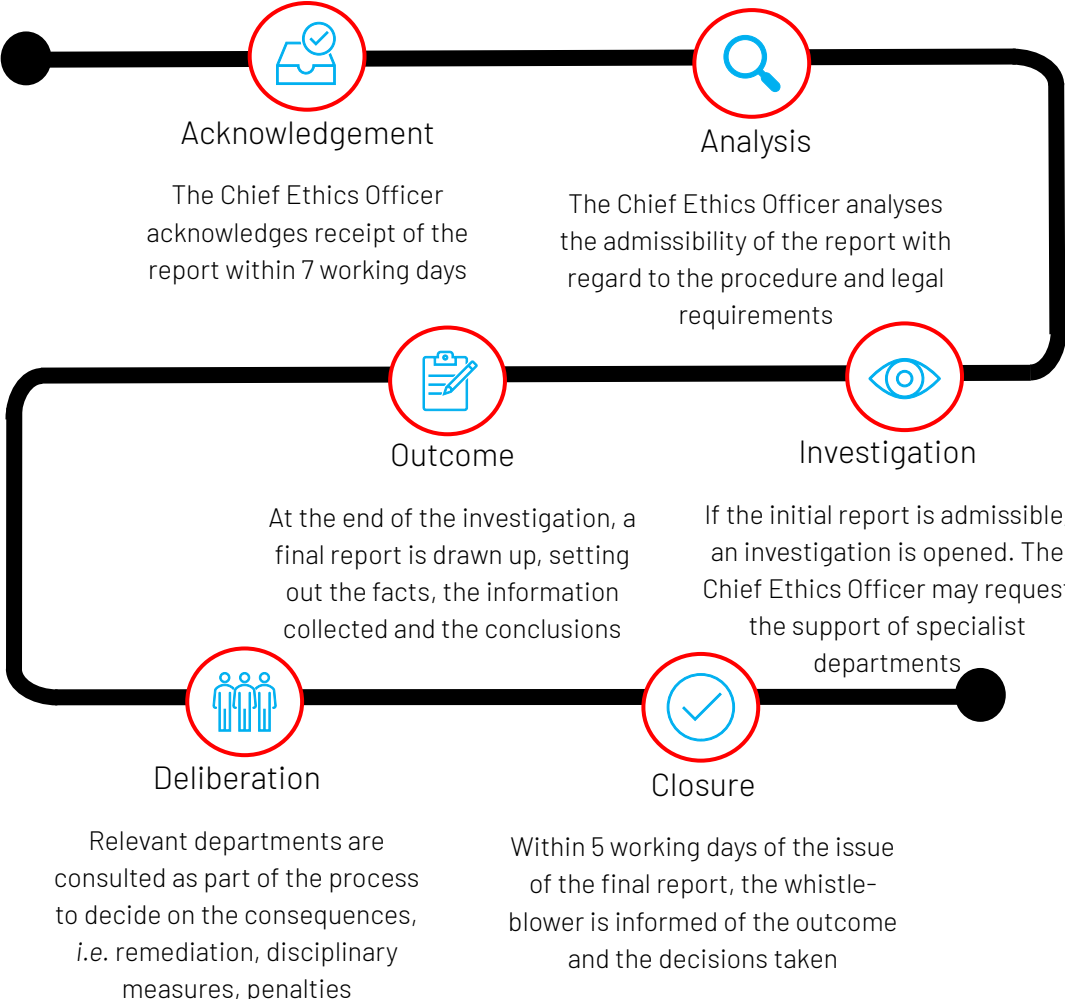
HOW CAN WE REPORT BEHAVIOUR THAT CONTRAVENES THE PROVISIONS OF THIS CODE?

Nexity group has set up a **whistle-blowing system** (accessible *via* [this link](#)) that allows **any permanent or occasional employee**, as well as **any third party** (e.g. employee of a service provider, supplier or subcontractor) to **use their right to report any breach**, as defined in the [whistle-blowing procedure](#) in force.

Reports are handled with **confidentiality** and whistle-blowers are **protected against any form of retaliation** (disciplinary measures, intimidation, harassment, discrimination, etc.). The system strictly complies with legal provisions relating to the protection of personal data.

Whistle-blowers have the option to remain anonymous and can file a **report online** or **by voice recording**. The **right to report** must be **exercised in good faith, without direct financial compensation, in a responsible, non-defamatory and non-abusive manner**.

The steps in the whistle-blowing procedure are as follows:



The total duration of an investigation may not exceed three months from the date of acknowledgement of receipt of the initial report.

WHO CAN VIEW THE CODE OF ETHICS AND HOW?

The Code of Ethics is a **public document and is shared with stakeholders**. In addition to the dedicated space for employees, it is accessible *via* the Group's website.

3. INTERNAL RELATIONS WITHIN THE GROUP

At all times, each employee must remain loyal to the interests of the Group and help foster harmonious relations within the Group.

3.1. RESPECT FOR AND PROTECTION OF INDIVIDUALS

PROTECTION OF PEOPLE AND THE WORKING ENVIRONMENT

The Group pays particular attention to working conditions and ensures **a working environment that complies with national and international standards** regarding working conditions. In addition to the provisions of the French Labour Code, the Group applies the provisions of the **United Nations' Universal Declaration of Human Rights**, the **Charter of Fundamental Rights of the European Union**, **Directive 89/391/EEC of 12 June 1989 concerning improvements in the safety and health of workers at work**, as well as the **Fundamental Conventions of the International Labour Organization (ILO)** to ensure the protection and safety of employees.

HEALTH AND SAFETY

The Group is committed to **taking all necessary measures to ensure the safety and protect the physical and mental health of its employees**. The Group's employees must comply with the measures in place to reduce their exposure to risk and ensure their health and safety, as well as that of their colleagues and/or service providers.

In order to comply with the Group's current safety standards, employees must not bring into the workplace any object or substance that could be considered dangerous or illegal.

COMBATING HARASSMENT AND VIOLENCE AT WORK

The **moral harassment of an individual** for any reason whatsoever is strictly prohibited and will not be tolerated by the Group under any circumstances. The law punishes **the act of**

harassing others through repeated comments or behaviour, the purpose or effect of which is a deterioration of working conditions, likely to undermine their rights or dignity, to alter their physical or mental health, or to compromise their professional future (Articles 222-33-2 of the Criminal Code and L.1152-1 et seq. of the French Labour Code).

Any act of sexual harassment, or considered equivalent to sexual harassment, is also strictly prohibited. Furthermore, in accordance with the provisions of Article L.1153-2 of the French Labour Code, no-one may be sanctioned, dismissed or be subjected to discriminatory measures, directly or indirectly, for having been a victim of or refused to be subjected to acts of sexual harassment.

Any act or threat of violence in the workplace by or against employees, or any individual having a professional relationship with the Group, is prohibited and may lead to disciplinary measures.

The use of disrespectful language, insults or profanity is forbidden. It is also important that activities are conducted in a manner that is respectful to individuals and companies – customers, suppliers, partners, competitors, local residents, communities – and that courtesy is prioritised in all relationships.



Any situation deemed abnormal must be reported to the Human Resources Department or, depending on the assessment of the situation, using the whistle-blowing system. Exemplary behaviour is expected of all employees, and managers in particular, in this respect.

ANTI-DISCRIMINATION

Direct or indirect discrimination is the unfavourable treatment of a person on the basis of a ground prohibited by law (e.g. origin, sexual orientation, etc.). Constituting an offence pursuant to Articles 225-1 et seq. of the Criminal Code, it is punishable by a fine and/or imprisonment.

The Group does not tolerate discrimination of any kind (moral, political, religious, sexual, age, origin, disability, etc.).

Through this document, the Group reaffirms its intention to fight all forms of discrimination (particularly in hiring, remuneration and promotion).

As such, the Group is a signatory of the Diversity Charter, which commits it to "promoting and seeking diversity through recruitment and career management". All employees

undertake, in accordance with the law, **to refrain from discrimination of any kind against the Group's employees, customers, suppliers or partners.**

The development of professional skills is a necessary condition for the Group's success. The Group is therefore particularly committed to the principles of **equal opportunity and fair treatment based on the recognition of merit and performance.** It also supports the professional development of its employees, notably through promotion, internal mobility and training.

RESPECT FOR PRIVACY

Privacy is a fundamental right protected by Article 9 of the French Civil Code and Article 8 of the European Convention on Human Rights. **Any infringement of this right, whether it concerns personal or family life, image, correspondence or other intimate aspects, may be punishable by law.**

The Group is particularly mindful of this fundamental right and **ensures that every employee is treated with dignity and with full respect for his or her private life.**

The Group is committed to ensuring the confidentiality of personal information.

Any collection, use or disclosure of personal information must be carried out in accordance with the law and the Group's internal rules and regulations, in particular those governing the manual and automated processing of information.

Nexity group ensures compliance with the **French Data Protection Act and the European Data Protection Regulation (GDPR).**



A Data Protection Officer has been appointed at Group level.

3.2. PROTECTION AND APPROPRIATE USE OF THE GROUP'S ASSETS

PROTECTION OF THE GROUP'S ASSETS

Maintaining the integrity of the Group's assets ensures its prosperity, from which all employees benefit. As such, **everyone must ensure that these are protected from any degradation, loss, theft, damage, negligence, misappropriation or use for personal purposes.**

"Assets" refers not only to movable assets (e.g. vehicles, furniture, computers, telephones, etc.), buildings or intangible assets identified and defined by law, but also to ideas and expertise developed by the Group's employees in the course of their duties.

In particular, this includes:

- Lists of current or prospective customers, subcontractors or suppliers;
- Market information;
- Technical or commercial practices;
- Expertise;
- Supply for sale and technical studies.

Generally speaking, **all data and information to which employees have access in the course of their duties are Group assets.** These elements are protected and remain the property of the Group.

USE OF THE GROUP'S DIGITAL ASSETS

The rules relating to the use of the Group's digital assets are set out in the **IT Charter, which is appended to the internal rules and regulations of each entity.**

As such, **communication systems and the intranet networks are the property of the Group and are to be used for business purposes.** Personal use is only permitted if it remains **reasonable, is justified by the need for a fair balance between personal and professional life and is genuinely necessary.** These systems and networks may not be used for unlawful purposes such as sending racial, sexual or offensive messages.

It should be noted that emails may be intercepted by third parties. Therefore, **employees should take the same precautions as in their written correspondence,** such as verifying recipients, not sending unprotected sensitive information, and staying vigilant against phishing and fraud attempts.

With regard to Internet access, **the downloading of non-professional data and the viewing of websites whose content could harm the Group's image** is strictly prohibited. It is also prohibited to install software or other applications on laptops without prior authorisation from the Group's Digital Department.

PROTECTION OF INTELLECTUAL PROPERTY

In order to maintain its leadership position in its sector, the Group allocates significant financial and human resources to the creation of innovative products, processes and ideas in the technical, financial and commercial fields that represent a high-value asset for the Group.

In addition to the necessary confidentiality inherent in the Group's documentation, **all documents and information relating to intellectual, industrial and artistic property, or the expertise that constitutes the Group's strength, must be protected both physically and legally with the utmost care.**

Physical protection includes measures such as **passwords for the encryption of electronic data, locked storage for paper documentation, the careful handling of emails and letters, and refraining from discussing confidential matters in public places.**

It is strictly **forbidden for any Group employee to appropriate confidential information from third parties in a professional context, or to use, violate or copy without authorisation intellectual property rights belonging to third parties** (such as patents, copyrights, trademarks or trade secrets). In addition, it is **prohibited to make illegal copies of the software used by the Group.**

OPPORTUNITY AND GROUP RESOURCES

Taking advantage of the Group's knowledge of a project or opportunity for one's own gain is prohibited (for example, acquisition of land adjacent to a project, acquisition of a minority stake in a partner company, acquisition of an asset under mandate, etc.).

This type of behaviour can constitute a conflict of interest. For more information, the Anti-Corruption Code of Conduct appended to the internal rules and regulations is available *via [this link](#)*.

PREFERENTIAL TRADING TERMS

Employees can only benefit from preferential trading terms offered to them in strict compliance with the current granting procedure outlined on the Nexity intranet and **subject to systematic declaration**, including in the case of purchase *via* a company (e.g. investment partnership).

Failure to comply with the procedure for granting these preferential trading terms may lead to disciplinary measures.

3.3. PROTECTION OF THE GROUP'S IMAGE

The Group's reputation and the quality of its corporate image are essential to its long-term sustainability and success.

It is therefore vital that **every employee takes care to preserve the Group's image and its products by avoiding any behaviour likely to damage the reputation of the Group, whether through derogatory comments, unjustified criticism or demeaning action.**

This includes **any abusive oral or written exchange, in a public or private capacity, using any means of communication** and in particular on social networks, through the media or within private circles.

Everyone must show respect and take responsibility for the Group's image, so as to contribute to its upholding and development.

3.4. RELIABILITY AND ACCURACY OF INFORMATION

Sound management requires the utmost rigour in the transmission of information.

Each employee, in the context of their work, is responsible for the accuracy of the information they communicate both internally and externally and for the retention of the necessary supporting documents. The reliability of shared information enables the correct keeping of the Group's books and accounting records in accordance with the Group's accounting rules and locally applicable accounting laws and regulations.

To this end, **everyone must endeavour to provide and transmit data and documents that are as accurate and precise as possible, and especially not to provide information or documents that have been falsified or are deliberately incomplete in any way.**

3.5. CONFIDENTIALITY

All confidential information must be handled appropriately, according to its level of sensitivity, regardless of its medium – whether it is held as traditional documents (reports, summaries, etc.) or *via electronic tools* (voice messages, email inboxes, computer files, spreadsheets).

Employees dealing with confidential matters as part of their duties must ensure that they respect this classification and the **duty of discretion** applicable to them in this respect, and that the security of this information is protected.

Confidential information includes, but is not limited to:

- Information **relating to inventions, patent applications, the development or manufacture** of any product or service, including drawings, performance statistics, manufacturing processes, test data and specifications.
- Information **relating to employees**: remuneration, social benefits, personal data.
- Information **relating to the Group** (procedures, standards, etc.).
- **Market information** relating to our products, customers, prices, supplier conditions and competitors.
- **Any non-public information** about the Group and its activities, including transactions with customers, financiers or mergers, acquisitions and disposals.

All employees must **immediately inform their line manager or the Legal Department** of any incident likely to compromise the confidentiality of sensitive information.

DISCLOSURE OF INFORMATION

In cases where the sharing of confidential data with third parties is necessary, **employees must ensure that the relevant parties have signed a confidentiality agreement before any information is shared**. The standard templates are available on the Legal Department's SharePoint.

Any employee who discloses or receives confidential information must be aware of the provisions of the confidentiality agreement and be highly vigilant in his or her compliance therewith, so as not to expose the Group to risks. Particular care is required when signing such an agreement and, in general, when signing any document under which the Group's liability is incurred.

Even in the event of their departure from the Group, former employees remain under an obligation not to disclose confidential or proprietary information.

USE OF INSIDER INFORMATION

Group employees must not take advantage of their position to directly or indirectly make a profit for themselves, their friends or family.

It should be noted that the law prohibits the acquisition or sale of Nexity shares or securities of any other organisation on the basis of insider information (as this term is defined in stock exchange law). Employees with access to such information are informed of their registration on an insider list (permanent or occasional). This list is regularly updated by the Group's General Counsel, from whom it is always possible to find out whether information is or is not deemed insider information.

Such misconduct constitutes insider trading which is punishable by law (Article L.465-1 et seq. of the French Monetary and Financial Code).

4. EXTERNAL RELATIONS

4.1. ETHICAL CONDUCT

Any situation or event whose correctness appears questionable, which may appear illegal or be likely to harm the reputation of the Group or its subsidiaries must immediately be brought to the attention of the Legal Department at: conformite@nexity.fr.

Compliance with control obligations, cooperation with both internal and external control and audit bodies, as well as the prompt correction of shortcomings and malfunctions are mandatory.

The Group does not tolerate any illegal or unethical behaviour. The Group's customers and shareholders have the right to expect that the Group and its representatives respect and uphold the highest ethical values. In this regard, the Group has drafted an **Anti-Corruption Code of Conduct**, appended to the internal rules and regulations and available *via* [this link](#), which explains the risks of unethical behaviour.

Should an employee identify a situation that contravenes the rules set out in this Code, they must refer the matter to the **Group's Chief Ethics Officer** using the Group whistleblowing system, accessible *via* [this link](#).

4.2. ENVIRONMENT

As a developer-planner-operator, the Group believes it has a key role to play in driving the ecological transition. The commitment of all employees to consider and reduce the negative impacts of our activity on the environment is a guarantee of sustainable development for the Group.

Environmental protection is therefore a fundamental principle for the Group, applicable at all stages of its activity and supported by all employees.

The Group has drawn up a **carbon roadmap to 2030, certified in 2023 by the Science Based Target initiative (SBTi) as being 1.5°C aligned**. In addition to its activity as a developer-planner-operator, this roadmap also covers emissions related to the Group's administrative premises and vehicles. It is therefore everyone's responsibility to contribute to the implementation of the measures put in place by the Group in relation to this carbon roadmap.

In addition, in early 2025, the Group adopted an **environmental transition strategy, Impact 2030**, which covers the following issues: **Climate (mitigation and adaptation), Biodiversity and Water, Circular Economy and Sobriety**. It is up to everyone, in accordance with their duties, to contribute to the deployment of this strategy using the tools made available and the ecosystem of partners with which they carry out their duties.

4.3. LOYALTY TO CUSTOMERS

Customer confidence in the Group's activities and products is one of the Company's primary objectives.

This confidence is based on **accurate, fair and transparent information**, as well as **strict compliance with applicable regulations**. The Group strives to protect the interests of its customers, to protect their personal data in accordance with legal requirements, and to make only commitments that are achievable, which it undertakes to uphold.

In this respect, **the Group pays particular attention to compliance with regulations governing the communication and promotion of its offers**. Each employee must ensure that any advertising or promotional action complies with legal requirements and the principles of transparency, thus guaranteeing reliable and ethical information for customers.

This confidence is acquired and maintained, in particular, through **full respect for one's rights, the preservation of one's interests, the protection and use of personal data in accordance with regulations and an ongoing concern to make only commitments that can be kept**, and then to uphold them.

Nexity group is committed to **guaranteeing a high level of protection of the personal data of any person whose data it processes**. In particular, Nexity group is committed to the following principles:

- Personal data is processed in a lawful, fair and transparent manner;
- Personal data is collected for specified, explicit and legitimate purposes, and is not later used in a way that deviates from the original purpose(s);
- Personal data is stored in the proper and relevant way and is limited to what is necessary for the purposes for which it is processed;
- Personal data is accurate, kept up to date and all reasonable measures are taken to ensure that any inaccurate data, having regard to the purposes for which it is processed, is promptly erased or corrected.

4.4. LOYALTY TO SHAREHOLDERS

The Group and its executives are committed to maintaining a transparent, balanced and honest dialogue with all investors, this being a key factor in establishing long-lasting relationships of trust.

With this in mind, the Group strives to provide complete, clear and accurate information that allows investors to make informed decisions. This information must not only be fair and true, but must also accurately reflect the Group's financial position, performance and outlook.

The Group is committed to high standards in terms of financial communication, ensuring that all stakeholders, whether shareholders, analysts or other investors, have access to reliable, relevant and up-to-date data.

This open dialogue and transparency help to strengthen investor confidence, while guaranteeing the Group's sustainability and stability over the long term.

4.5. FAIR COMPETITION

The Group respects the rules of free competition and condemns any agreement between competitors or abuse of a dominant position. Nexity complies with the specific rules governing public procurement and relations with public authorities, irrespective of the country in which they operate.

The Group prohibits its employees from exchanging sensitive information with competitors. It manages and markets its projects at market prices and in line with market conditions.

Employees are required to respect the rules of competition and comply with legal provisions in force. The following principles must be complied with:

- **Prohibition of agreements between competitors:** it is illegal for competitors to collude and hinder fair competition. This includes agreements on market sharing, whether geographically, at product level, at customer level or in the setting of prices between competitors, either directly or indirectly. These practices are strictly prohibited and represent a violation of competition law.
- **Prohibition on collecting competitive information in an unfair manner:** although it is common and permitted to gather information about one's competitors, it is strictly prohibited, under competition and commercial laws, in general, to obtain information about one's competitors in an illegal or unfair manner (e.g. theft or even retrieval of information *via* employees who have been newly recruited from a competitor).
- **Prohibition on obtaining or retaining confidential information in an unfair manner:** no confidential information belonging to a third party may be obtained or retained without the written consent of that third party (signed confidentiality agreement). This practice is acceptable only if said information has been legally and ethically obtained from public sources (such as trade fairs, websites, publications, press releases, etc.).
- **Prohibition of unfair advertising:** it is prohibited to compare Nexity products with similar competitor products as part of advertising or promotional campaigns if this comparison is not based on objective and real studies or data.
- **Respect for our fellow man:** employees must ensure fair competition and that relations with others are always respectful and courteous. They must conduct their activities in a spirit of healthy competition, whilst ensuring that this does not result

in disputes with their peers. In particular, they must refrain from using incorrect or unfair procedures to enter into business relations with others.

These examples are given by way of illustration only; many other practices may also be prohibited by law, depending on the country in which the product is marketed.



Any incident or doubt concerning competition law must be brought to the attention of the Legal Department who will take the appropriate and diligent action.

4.6. LOYALTY TO BUSINESS PARTNERS

Business partners must be treated fairly in all countries where the Group operates.

Suppliers will be selected **on the basis of their performance**, assessed using **objective criteria**, and **ethical criteria** will be taken into account in line with the Group's values.

Employees, and in particular those involved in global purchasing activities, **have a responsibility to behave in a fair, equitable and honest manner with suppliers**. When dealing with suppliers, employees represent the Group and must reflect and represent its interests and needs in a manner that complies with the principles set out in this Code. **The information provided must be true, accurate and never manipulated with the aim of misleading the other person or generating personal profit.**

All purchases of goods and services on behalf of the Group must be made in accordance with the applicable Group procedures. The Group selects its suppliers on the basis of price, quality, delivery, service, diversity and reputation. Other factors, such as ethical, social, and environmental practices, are also considered. The prices charged must always be in line with market practices.

Employees must treat all partners, suppliers and subcontractors, regardless of their size or status, honestly and fairly, and ensure the protection and **proper use of their personal data**.

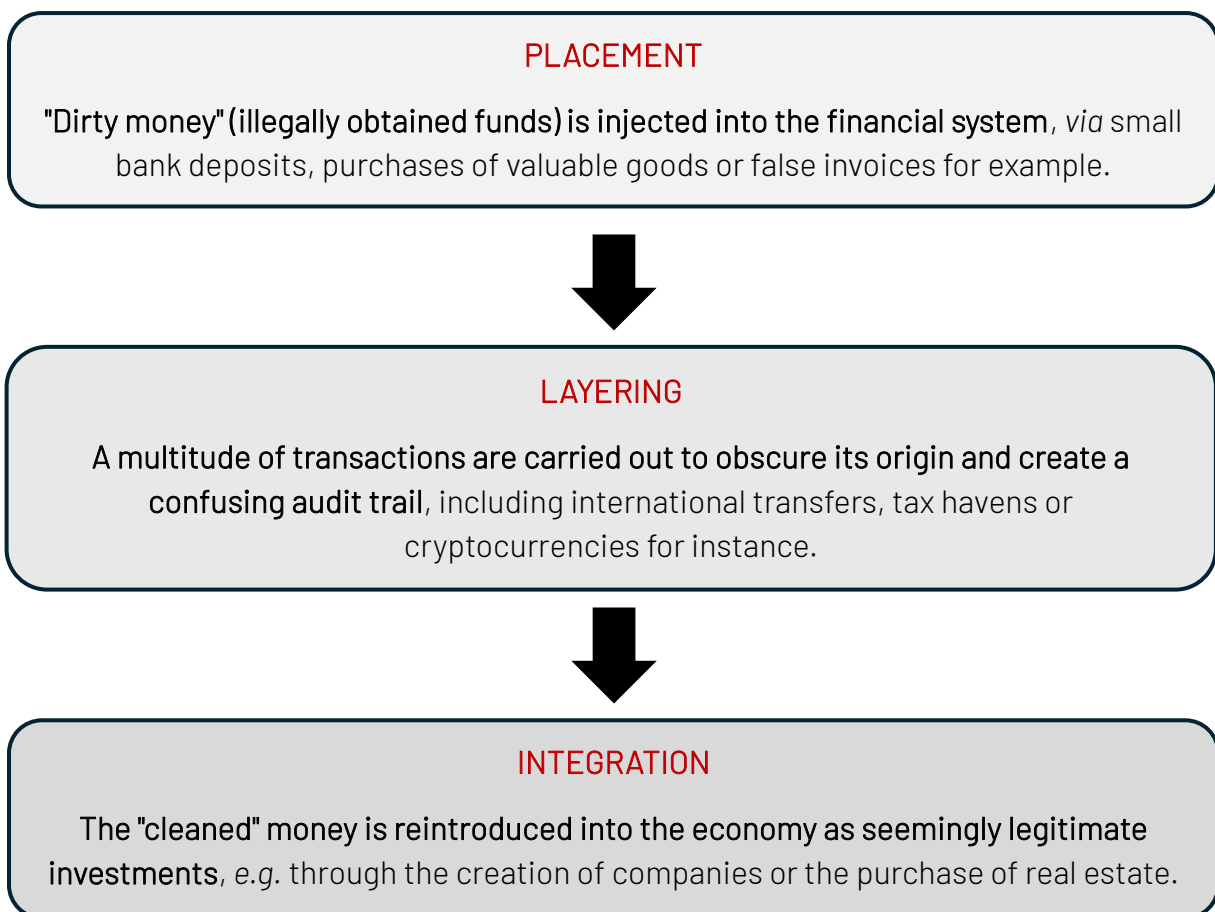
Relationships with business partners can expose the Group to risks of ethical breaches and constitute criminal offences (corruption, influence peddling, etc.). An Anti-Corruption Code of Conduct dedicated entirely to these risks has been drawn up by the Group. It is available *via* this link and has been appended to the Group's internal rules and regulations. Other topics covered include gifts and invitations, conflicts of interest, patronage, sponsorship and lobbying.

4.7. ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM (AML-CFT)

Money laundering is a criminal offence under Articles 324-1 *et seq.* of the Criminal Code. It is defined as **the act of facilitating, by any means, the false justification of the origin of the assets or income of a perpetrator of a crime or offence that has directly or indirectly resulted in a financial gain for him or her.**

Assisting in an operation to invest, conceal or convert the direct or indirect proceeds of a crime or offence also constitutes money laundering.

The money laundering process:



The financing of terrorism is a criminal offence under Article 421-2-2 of the Criminal Code. It is defined as **the act of facilitating, by any means, the collection of funds, assets or property of any kind for the purpose of committing terrorist acts.**

As a real estate company, Nexity participates in the fight against money laundering and the financing of terrorism, in accordance with Article L.561-2 et seq. of the French Monetary and Financial Code.

As such, the Company monitors financial flows in compliance with the law on the protection of privacy, the fundamental rights and freedoms of individuals, the fight against discrimination and professional secrecy.

It is everyone's responsibility to participate, at their own level, in this constant vigilance and to follow the internal procedures in place and available on the intranet.

AML/CFT MEASURES IN PLACE

In accordance with the regulations and guidelines issued by the DGCCRF (Directorate General for Competition Policy, Consumer Affairs and Fraud Control) and TRACFIN (French Ministry of Economy's Financial Intelligence Unit), the Group has implemented the necessary identification and vigilance measures to detect risks.

These measures relate in particular to:

- Verifying the identity of the customer and the effective beneficiary at the beginning of and over the course of the business relationship;
- Assessing risks based on clearly defined and up-to-date criteria;
- Implementing additional verification measures in the event of enhanced vigilance;
- Providing Nexity employees with training and awareness-raising sessions on this topic.

An e-learning training module is available to all employees, as well as a dedicated information page on the intranet.



In the event of a suspicion of money laundering or terrorist financing, employees are **required to inform the appointed TRACFIN officer within the relevant company** who, where applicable, will send a **suspicious transaction report to TRACFIN**. The contact details of the TRACFIN officers are available on the intranet and from the Group Compliance Department.

4.8. POLITICAL ACTIVITIES

The Group does not directly (contribution) or indirectly (purchase or supply of goods and services) support any political activity, on a local, national or international scale.

The Group respects its employees' commitments to political, cultural, humanitarian and sporting activities. These activities pertain to employees' personal commitments only and should not in any way involve the Group. Their exercise must take place exclusively outside of the workplace and working hours.

For example, an employee holding an elected office must be careful not to make, prepare or issue an opinion on a decision that would create a conflict between the public interest and his or her private interests.

In this case, the employee must follow the recusal process set out by the public authority with which they are involved. Failing this, he or she must, in conjunction with his or her line manager, organise recusal from his or her duties and ensure that the persons who need to know about the conflict of interest are justly informed.

4.9. ENQUIRIES

Any **request for information from an authority** (administrative or judicial) concerning the **Group's activities, or those of its employees in a professional context**, must be reported immediately to the Legal Department.