HUMAN RIGHTS POLICY

Owner	Sînziana Pardhan, Group Director, Strategic Transformation and Sustainability
Approved by (Sponsor)	Thilo Kusch, CFO
Valid from	01.10.2023
Updated	01.01.2026 01.09.2026
Version no	3.0
Validity	Unlimited unless otherwise updated or replaced

Table of Contents

1. Introduction 3
2. What does this policy do? 3
3. Human Rights at P3 3
4. What must you do? 3
5. Operational Measures 4
6. Policy review 5

1. Introduction

As the first European Logistics Real Estate company to become a signatory of the United Nations Global Compact, P3 is committed to respecting all internationally recognized human rights that are relevant to our operations. P3 is committed to adhering to the core International Labour Organisation (ILO) Conventions, as well as the UN Guiding Principles on Business and Human Rights[1], the OECD Guidelines for Multinational Enterprises and the United Nations Universal Declaration of Human Rights[2]. Enforcing human rights values in P3's business operations and our value chain is not only good business sense, but the right thing to do.

2. What does this policy do?

This policy sets out P3's commitment to respect human rights and our responsibility in ensuring that internationally proclaimed human rights are met within P3's business operations and supply chain. Additionally, our processes to define, classify, evaluate, prevent, and account for our impacts on human rights are described. Where our activities may cause or contribute to adverse effects on human rights, this policy outlines the typical procedures for resolution and remediation.

This policy applies to P3 employees and to our customers, consultants, contractors, non-profit partners and suppliers ("business partners"), to the extent their activities impact P3's business operations, brand or reputation.

3. Human Rights at P3

P3, as a pan-European entity, will comply with national laws, including those on human rights, in the countries in which it operates. P3 seeks to respect international human rights to the greatest extent possible. Where conflicts in national regulation and international standards occur, the more stringent standard would prevail.

P3 has several supporting documents that align with our commitment to human rights:

- Our Employee Handbook outlines expectations for our employees.
- The Code of Conduct sets out P3's standards of ethical behaviour, including its approach on human rights.
- Other relevant policies related to health and safety, diversity, equity and inclusion etc.

In our business dealings, we expect our business partners to adhere to business principles aligned with our own. P3 prohibits discrimination; bonded and forced labour or human trafficking; child labour; or retaliation against employees for exercising their rights to freedom of association and collective bargaining. P3 is also committed to providing safe and healthy working conditions and preserving the dignity of the individual.

4. What must you do?

All our employees and business partners are expected to comply with our human rights policy and uphold our principles regarding human rights.

4.1 Education and training

P3 educates employees on human rights topics to raise awareness and enlist their support to reduce P3's exposures and causal risk factors. Independent third parties may be used to deliver training or support corrective action procedures. Where relevant, P3 reviews these parties' training / education records and credentials.

4.2 Audits and detection of incidents

P3 may, where feasible, periodically execute audits at its assets, operations, or on the premises of major

[1] https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf
[2] https://www.un.org/en/about-us/universal-declaration-of-human-rights

contractors or suppliers. For contractors or suppliers, P3 may request scheduled or, where contractually permitted, unscheduled on-site visits, either directly or through an independent third party, to assess site, contractor or supplier compliance with human rights and to conduct any associated corrective action procedures.

4.3 Due diligence and onboarding

Our Code of Conduct forms part of our due-diligence expectations and is reviewed by business partners where required as part of our procurement and risk-assessment processes. In addition, we use the Know Your Customer (KYC) questionnaire for business partners meeting a certain business spend threshold. As part of the KYC assessment process, we employ a risk-based approach, assessing human and labour rights, environment and sector risks. Based upon this, business partners receive either our standard or enhanced questionnaire. Our enhanced questionnaire includes specific questions on human rights to assess potential and existing business partners' approach to these topics. The outcomes of the questionnaire are taken into consideration during the contract awarding process.

This procedure is reviewed every two years for long-term partnerships and compliance is overseen by P3's Compliance Officer.

4.4 Incident reporting

P3 encourages employees and business partners to report actual or suspected human rights violations, unlawful, unethical or improper conduct, including breaches of P3 policies, through P3's Speak-up channels.

Reports may be made anonymously and are treated seriously and in strict confidence. They are followed up by designated P3 personnel and, where appropriate, may be investigated or escalated for further action. P3 prohibits retaliation against persons who make reports under its Speak-up Policy. Where relevant, P3 will contact the appropriate local authority to report severe incidents of human rights abuse. Further information is available in our Employee Handbook and Speak-up Policy.

4.5 Monitoring and improvement

P3 periodically monitors and defines methods to improve its direct and indirect performance regarding human rights. Such actions may be triggered by factors including the outcome of KYC questionnaires, findings from business partner audits, incidents or concerns reported through P3's internal channels or whistleblowing mechanism, changes in applicable laws or industry standards, or emerging risks identified in P3's operations or supply chain.

4.6 Remedy of violations and incidents

Where feasible, P3 will work together with our partners to remedy detected/reported violations and incidents to ensure that adverse human rights risks and causal factors are eliminated from our value chain. Additional monitoring and reporting from our partners may be a part of the remedy.

Serious violations, whether occurring in P3's business operations or in personal, non-business activities where these have a demonstrable impact on P3, may affect the individual's or organisation's relationship with P3. As a last resort, P3 may terminate the employment, contracts, and/or use of services.

5. Operational Measures

5.1 Governance

ESG governance at P3 is defined by the Delegation of Authority framework and overseen by the P3 Group Board of Directors, which approves the overall ESG strategy, key targets and material updates. Ultimate accountability for human rights rests with the CEO, who delegates executive oversight for these matters to the CFO.

To support this, the CEO is advised by the ESG Committee, chaired by the Group Director of Strategic Transformation and Sustainability. The Committee meets at least bi-annually and ensures human rights requirements are integrated into strategy, investment decisions and risk management. A monthly cross-

functional ESG Working Group coordinates implementation across departments, monitors progress against targets and elevates material issues for review.

This structure ensures ESG responsibilities are clearly assigned, consistently applied across the business, and aligned with P3's regulatory obligations and strategic objectives.

5.2 Reporting on human rights

Human rights performance is monitored and reported internally, with selected information disclosed externally, including through annual ESG reporting and where required by applicable regulations.

Major incidents are also reported, as appropriate, to the Crisis Line, Legal & Compliance, HR, the relevant Country Managing Director(s) and the Management Team.

6. Policy review

This Human Rights Policy is reviewed at least every two years, or more frequently in response to significant regulatory, operational, or stakeholder developments.