* * * Group Code of Conduct * * *

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CLAUSE

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DEFINITION

Sirius Group ("**We**" or "**Group**") - Sirius Real Estate Limited (parent company, Guernsey registered) and its subsidiaries from time to time.

Registered office: Plaza House, Fifth Floor, Admiral Park, St Peter Port, Guernsey GY1 2HU, Channel Islands
Telephone number: +44 1481 743 898

Registered number: 46442

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1. Policy Purpose

The code of conduct policy defines the ways of working in the organisation. It sets out what we expect from each other at work when it comes to important things like integrity, office behaviours, relationships at work, ethical standards and avoiding corruption. The policy is not contractual and doesn't form part of your terms of employment and we will be updating it from time to time.

Please do read this policy as when we follow both its spirit and letter, as well as encouraging others at Sirius to do the same we create a collaborative environment for each other. If you have any questions or concerns, please let us know.

2. Ethical Standards and Anti-Corruption

A commitment to honesty, integrity, and ethical behaviour in all business operations is at the core of our business character. Our reputation is built on the actions of individual staff. All the company staff are responsible for conducting our day-to-day business according to the highest ethical standards.

At Sirius we have a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.

It is a criminal offence to offer, promise, give, request, or accept a bribe. We therefore take our legal responsibilities very seriously.

We need everyone to observe and uphold our position on bribery and corruption and so have set out some information and guidance to those working for us on how to recognise and deal with bribery and corruption issues. Please see our Group policy relating to Anti-bribery and Corruption.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

3. Integrity and Avoiding Tax Evasion

At Sirius we strive to always conduct all our business in an honest manner. We take a zero-tolerance approach to the facilitation of tax evasion. Tax evasion facilitation means deliberately and dishonestly being knowingly involved in the fraudulent evasion of tax by another person. We will uphold all laws relevant to countering tax evasion.

This means that you must not engage in any form of facilitating tax evasion or foreign tax evasion or encourage anyone to do this (including by failing to report this). Avoid any activity that might lead to,

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or suggest, tax evasion and foreign tax evasion and notify your manager as soon as possible if you suspect anyone has breached (or may breach) this policy.
People who raise concerns or report another's wrongdoing are sometimes worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken.

4. IT Security

We all use IT and communications systems every day and these are crucial to the work we do at Sirius. When using our IT and communications systems we ask that you observe the following key rules:

You are responsible for the security of the equipment you use so don't allow it to be used by others unless permitted in this policy or supporting I.T policies

- You must lock your computer or device when leaving it unattended and don't let unauthorised people access our network without supervision
- You should use passwords on all IT equipment, keeping passwords confidential and changing them regularly.
- You should not delete, destroy or modify existing systems, programs, information or data or download or install software from external sources without proper authorisation.
- You should exercise caution when opening suspicious or unsolicited emails from unknown sources.
- Do not send abusive, obscene, discriminatory, racist, harassing, derogatory, defamatory, or otherwise inappropriate emails. Anyone who feels that they have been harassed or bullied or are offended by material received from a colleague via email should inform their line manager or the People & Talent team.
- Do not access any web page or download any image, document or other file from the internet which could be regarded as illegal, offensive, in bad taste or immoral.
- You should report suspected or confirmed IT threats, such as phishing, malware and social engineering, to the IT department and take part in regular training on these topics

We take breaches of our IT policy seriously. Misuse of company IT systems will be dealt with under our Disciplinary Policy.

5. Relationships at Work / Conflict of Interest

We need everyone to be mindful of the need to avoid conflicts of interest at Sirius. So do avoid managing or making decisions about potential or existing Sirius business relationships that involve your relatives, spouse or significant other or close friends. For example, we don't want you to be the hiring manager where your relative or close friend is being considered for the role.

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Romantic relationships between colleagues follow the same logic and it is important to ascertain that they do not create an actual or apparent conflict of interest. If a romantic relationship does create such a conflict, then we might need to make changes to the work arrangements of those involved.

You should advise your Line Manger or the People & Talent team if there is any family connection or close relationship between yourself and a colleague, customer or a customer's management or shareholders. You should ensure that in no way are the interests of the company compromised by personal relationships during the conduct of your employment.

Please refer to your country specific policy for further information.

6. Drugs and Alcohol

Due to the nature of our business and the high level of health and safety regulations surrounding property matters, the company has adopted an alcohol policy. Staff should therefore not attend work under the influence of Alcohol or consume during working hours. Alcohol should not be brought onto Company premises for consumption, and staff should not, under any circumstances, visit sites or customers having consumed alcohol.

However, at company functions, it is acknowledged that some staff may drink alcohol. Staff must act in a professional and sensible manner at all times. The amount consumed must not be to the extent that it impairs your job performance and you must not, under any circumstances drive having consumed any amount of alcohol.

Drugs, other than those prescribed by a medical practitioner and bought as proprietary medicines, must not be brought onto the company premises. To be at work whilst under the influence of non-prescription drugs is a serious offence, which will normally justify dismissal.

7. Equal Opportunities

Sirius is an equal opportunities employer and we prohibit discrimination, harassment and bullying in any form – verbal, physical, or visual. We are committed to providing a working environment free from harassment and bullying and ensuring people are treated, and treat others, with dignity and respect, as discussed more fully in our Equal Opportunities / Respect at Work, Bullying and Harassment policies. You must ensure that you are familiar with these policies and follow them to the letter and also in spirit.

8. Whistleblowing

At Sirius we are committed to conducting our business with honesty and integrity and we expect everyone we work with to have the same high standards. However, all organisations face the risk of

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things going wrong from time to time and so we also want a culture of openness and accountability to prevent wrongdoing occurring and to address it when it does.
We encourage you to report suspected wrongdoing as soon as possible and if you do your concerns will be taken seriously and investigated and your confidentiality will be respected. We want everyone to be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

By whistleblowing we mean is the disclosure of information which relates to suspected wrongdoing or dangers at work – this might be criminal activity, failure to comply with any legal obligation, danger to health and safety or to the environment or any of these things being deliberately concealed. A whistleblower is a person who raises a genuine concern about any of these things.

If you have a whistleblowing concern, then we hope that in most cases you will be able to raise this with your line manager who may be able to agree a way of resolving your concern quickly and effectively. If the concern is more serious or you prefer not to raise it with them, you should contact the People & Talent team. Please see our Group policy relating to Whistleblowing for details of how to raise a concern.

While we cannot always guarantee the outcome you are seeking, but we will always aim to try to deal with your concern fairly and in an appropriate way.

9. Media Relations

Any enquiries made to you from the media (e.g. TV, radio, press etc.) must be referred to a Director. You are required to obtain permission from a Director before submitting any written material on professional matters to the media.

You are not permitted to give an interview for any purpose connected with the company, a customer, or professional matters without the prior written consent of a Director. Should you be involved in an interview for any other purpose, you must not disclose your employment with the company or the company's name at any time. A breach of the rule may invoke the company's disciplinary procedures.

10. Intellectual Property

Any material you produce during the period of your employment including any computer software or related material with which you may have worked or been involved in developing, is the sole property of the Company in so far as it relates to the company or any aspect of its business.

11. Confidential Information

You must not disclose to any person who is not a member of staff any information relating to customers, suppliers or the company's business, which results from the knowledge you have

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gained in the course of your duties. This applies both during and after your employment with the company. You should, where appropriate, restrict the discussion of confidential matters and the disclosure of confidential documents to members of the company staff who are directly concerned.

In discussing and holding confidential information, you should take particular care that where you discuss the affairs of clients amongst yourselves in public places, your conversation is not overheard and where you are required to take Confidential paper or computer files or working papers out of your office:
a) access to the these are restricted to members of the company's staff only (those directly concerned with their contents);
b) they are not exposed while working at clients' offices; and
c) adequate security arrangements are maintained at lunchtimes and at night and, in particular, that files/working papers are not left in cars. This includes computers on which files may be held.

The company considers confidentiality an extremely important issue. Any breach, which causes serious embarrassment or financial loss to the company, would be regarded as a breach of professional confidence, justifying summary dismissal of the individual concerned.

12. Dress Code

In a work environment we represent each other as much as the organisation, so it is important that your appearance and dress is appropriate to your environment, the work you do and doesn't make your colleagues uncomfortable.

Smart and clean business attire, suitable to your role within the company, must be worn at all times during working hours.

We are a diverse company with professional colleagues. The following items of clothing are not considered appropriate business attire and are therefore not permitted:

- Denim clothing
- Party or going out clothes
- See-through clothing or overly exposing items make others uncomfortable
- Beach wear
- Clothing that has offensive wording or pictures
- Sportswear (including hooded sweaters)
- Trainers
- Flip flops, Crocs or other beach shoes

Employees are permitted to wear casual clothes on a Friday.

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If you have any questions about whether something is appropriate, please speak to your line manager or the People & Talent team. Please refer to your country specific policy for further information.

13. Group Values

Adaptability, Integrity, Humility, Industriousness

We believe honesty is the best policy. We give straight answers.

When we say we'll do something, we do it; it's that simple.

Our job is to be the engine room for small businesses, so we're always looking to make today better than yesterday and tomorrow better than today. We want everyone to be proud of what we do.

We think professionalism is in the art of the detail. We are empowered to take personal responsibility for our actions. We are relaxed and fun in our approach but leave no doubt that when the going gets tough, we roll up our sleeves and get going.

We believe teamwork is how individuals shine. We share the load (and the praise). We all have different skills and ways of tackling problems.

Supporting each other only makes our outcomes better.

14. Ways of Working

When it comes to ways of working, behaviours between colleagues it is really important to foster an environment of trust and collaboration. No policy can cover all of these but good meeting etiquette, timekeeping, politeness, understanding of diversity, a sense of fun and teamwork are something that will make our working lives better and Sirius a great place to work.

When in doubt – remember our values. And of course, if you have any questions on this feel free to get in touch with your manager or the People & Talent team.

Depending on where you work for us there may be extra policies that you need to follow so please do read the policies and procedures that apply to your location.

15. Complaints

If you believe that this Code of Conduct, any related policy, or applicable laws have been breached, you should raise the matter through the appropriate reporting, grievance or whistleblowing procedures. Complaints and concerns will be treated confidentially and investigated as appropriate.

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16. Status of this Policy

This Policy does not form part of any contract of employment and does not create contractual rights or obligations. Sirius reserves the right to amend, replace or withdraw this Policy at any time.

17. Review

This policy shall be reviewed and updated at least once a year, or more frequently if:

- there are significant changes to applicable laws or regulations;
- incidents or audits indicate that changes are necessary.

Updates will be communicated to staff, and the latest version will be available on the intranet.

Internal Use	
Version	1.3 – Annemie Ress - CHRO
Next review	September 2027 (Group Company Secretary authorised to update for factual changes before the renewal date)
Last update	September 2026
Approved	Sirius Board, 28 September 2026
Circulation to	Sirius Board, all staff.
Publication	Workvivo, staff handbooks, site notice boards

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