Rubik Properties

Sankt Annæ Plads 6
1250 Copenhagen K
Denmark

rubikproperties.dk

T +45 5115 9471

Code of Conduct

January, 2025

Code of Conduct for Rubik Properties

Introduction

This Code of Conduct outlines the ethical principles and standards of behavior expected of all employees, management, and representatives of [Company Name]. It serves as a guide to ensure our actions reflect our values, promote a healthy workplace culture, and maintain trust with our stakeholders.

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1. Compliance with Laws and Regulations

We are committed to full compliance with all applicable local, national, and international laws and regulations. All employees are expected to be familiar with and adhere to legal requirements relevant to their roles. Ignorance of the law is not an excuse, and any concerns or uncertainties must be reported to management or the compliance officer.

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2. Process and actions

As managers of valuable real estate assets, we hold a position of trust and responsibility. All employees involved in real estate asset management must act with integrity, due diligence, and in the best interest of the company and its stakeholders.

Key principles include:

- **Fiduciary Responsibility**: Act in good faith, with loyalty and care, to maximize value and long-term performance of real estate assets.
- **Transparency**: Maintain open, accurate, and timely communication with investors, tenants, partners, and regulatory bodies.
- **Fair Dealings**: Ensure all leasing, acquisition, and disposition activities are conducted fairly, ethically, and at arm's length. Avoid preferential treatment or undisclosed relationships with brokers, contractors, or tenants.
- **Compliance and Risk Management**: Adhere to all relevant real estate laws, zoning regulations, environmental standards, building codes, and contractual obligations.
- **Sustainability**:
  Promote responsible management, energy efficiency, and sustainable practices across the real estate portfolio.
- **Tenant Relations**: Treat tenants respectfully and professionally. Resolve issues promptly and uphold commitments in lease agreements.
- **Confidentiality**: Safeguard all sensitive information related to property transactions, valuations, leases, and business strategies.

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Employees are expected to maintain the highest ethical standards in their role as managers, negotiators, and decision-makers across the asset lifecycle.

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3. Accounting and Record Keeping

We are committed to maintaining accurate, complete, and transparent records in all aspects of our business. All financial transactions and company records—whether digital or physical—must be recorded truthfully and in accordance with applicable accounting standards, internal policies, and legal requirements.

Employees involved in preparing or maintaining records are responsible for ensuring:

- Transactions are recorded in a timely, consistent, and accurate manner.
- No false, misleading, or incomplete entries are made.
- All records are properly stored and accessible to authorized personnel.
- Financial and operational reports reflect the true nature of the underlying transactions.
- Any errors, irregularities, or suspected fraud are reported immediately.

Falsifying records or manipulating data undermines trust and may constitute fraud or criminal conduct. Our books must always reflect the true state of our operations and finances.

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4. Conflicts of Interest

Employees must avoid situations where personal interests conflict—or appear to conflict—with the interests of the company. All potential or actual conflicts must be disclosed promptly to a supervisor or designated compliance contact.

Transparency is key to maintaining objectivity and trust.

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5. Confidentiality and Data Protection

We protect the confidentiality of all proprietary, sensitive, and personal information entrusted to us. Employees must not disclose confidential information to unauthorized individuals or use it for personal gain. Compliance with data protection laws such as the GDPR is mandatory.

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6. Equal Opportunity, Diversity, and Inclusion

Rubik Properties is an equal opportunity employer. We celebrate diversity and are committed to creating an inclusive environment for all employees. Discrimination, harassment, or unfair treatment based on race, gender, religion, age, disability, sexual orientation, or any other protected characteristic is not tolerated.

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5. Company Values and Ethical Behavior

We act with integrity, professionalism, and respect in all our interactions—internally and externally. Our core values include:

- Accountability: We take responsibility for our actions.
- Respect: We treat others with dignity and consideration.
- Integrity: We take responsibility for our actions, keep our commitments, and stay true to our promises.
- Transparency: We communicate openly and honestly.
- Excellence: We strive for high standards in everything we do.

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7. Integrity and Anti-Corruption

Bribery, kickbacks, or any form of corrupt practices are strictly prohibited. We maintain fair and honest relationships with partners, suppliers, and public authorities. Gifts and hospitality must never influence—or appear to influence—business decisions.

8. Anti-Money Laundering

We are committed to preventing the use of our business for money laundering or the financing of terrorism. All employees must be vigilant and report any suspicious activities in accordance with applicable reporting procedures.

9. Workplace Behavior and Safety

All employees are expected to act professionally and respectfully toward colleagues and customers. We maintain a safe and healthy work environment, free from violence, bullying, or substance abuse. Everyone shares responsibility for safety and well-being at work.

10. Use of Company Resources

Company assets—including physical property, digital tools, and intellectual property—must be used responsibly and primarily for business purposes. Misuse or unauthorized use of company resources is not acceptable.

11. Reporting Violations and Whistleblower Protection

We encourage employees to report suspected violations of this Code of Conduct or any unethical behavior. Reports can be made confidentially and without fear of retaliation. Rubik Properties is committed to investigating all concerns promptly and fairly.

12. Implementation and Responsibility

This Code applies to all employees, officers, and directors. Managers have a responsibility to lead by example and to ensure that their teams understand and comply with these standards. Regular training and review will support ongoing compliance.

Approved by: Jacob Smergel-Krog (CEO) & Daniel Hye Hedemann (COO)
Date: 06-01-2025