



Better Developments

**Airspace Investments Limited
Human Rights and
Responsible Sourcing Policy**

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Introduction

Airspace Investments Limited (Airspace) is the ultimate holding company of several property investment, development and management companies. This policy sets out Airspace and its subsidiaries' commitment to respecting human rights and environmental stewardship, which has been embedded internally in policies adopted by members of senior management. This policy explains the steps that have been taken to ensure all environmental regulations are complied with and no human rights violations are taking place within Airspace's organisations, supply chains, or other business relationships.

This policy has been developed through internal discussions with senior management, reviews against existing policies and procedures and collaboration with third party consultants. It is published in accordance with recognised human rights legal requirements and industry best practice such as:

- EU Taxonomy Minimum Safeguards
- The Criminal Law (Human Trafficking) Act 2008 (Amendment) 2013
- The UN Guiding Principles on Business and Human Rights
- The International Bill of Human Rights
- The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work
- The OECD's Guidelines for Multinationals.

1. Organisational Structure and Policy Scope

Airspace is the ultimate holding company of multiple entities, and please note that references to Airspace throughout this policy includes reference to its subsidiaries. This policy applies to all Airspace's employees, contractors, suppliers, business partners, and third parties working for/on behalf of Airspace.

2. Human Rights

Airspace recognises the importance of respecting and safeguarding the human rights of its employees, business partners, local communities, and wider stakeholders. Airspace does this by establishing clear commitments and ethical standards for its employees and promoting these standards in its operations, its supply chains and its business relationships.

2.1 Modern Slavery

Modern slavery refers to forms of exploitation such as forced labour, child labour, debt bondage, and human trafficking. It affects people of all ages and backgrounds worldwide. Human trafficking involves the recruitment, transportation, or harbouring of individuals through force, fraud, or coercion for exploitation, and child labour is the employment of children in work that deprives them of their childhood, education, or dignity. These practices are illegal as per the Criminal Law (Human Trafficking) Act 2008 (Amendment) 2013.

Airspace prohibits all forms of modern slavery within its organisation and within its supply chain.

2.2 Whistleblowing

Airspace's anonymous reporting channel is available to employees, suppliers, clients and wider stakeholders.

3. Health and Safety

Airspace expects the highest standards of health and safety from its employees. It is committed to complying fully with the Safety, Health and Welfare at Work Act 2005 and 2010 and any subsequent Health and Safety Acts.

All employees are expected to promote responsible attitudes towards health and safety issues. Airspace also maintains a standalone Safety Statement demonstrating their commitment to ensuring the health, safety and welfare of employees at work, as far as is reasonably practicable.

4. Environmental Stewardship

Airspace is committed to managing material environmental impacts in its operations and requires its business partners to do the same. Airspace aims to source materials, goods and services that have a lower environmental footprint, and to encourage and promote sustainability amongst its vendor partners. Entities of Airspace are:

- Members of the Irish Green Building Council
- Supporters of the All-Ireland Pollinator Plan through landscapers and other contractors across its parks. This allows the organisation to carry out many pollinator friendly actions through its estate management programme every year, including the reduction of grass cutting and plant pollinator friendly planting
- Committed to complying with all applicable environmental regulations and standards

5. Airspace Expectations

5.1 Employees

Airspace encourages employees to act in a way that supports and safeguards the environment and the human rights of others and to consider the potential environmental and human rights impacts of their actions in all aspects of their work.

5.2 Suppliers

Airspace expects suppliers to uphold high standards of business, environmental stewardship and respect for human rights within their own operations and, where relevant, throughout their supply chains. Airspace's Supplier Code of Conduct sets out these expectations, and all suppliers are expected to comply with this Code.

Airspace is committed to working collaboratively with suppliers, as far as is reasonably practicable, to support or facilitate remediation in the event of any violations of its Code.

5.3 Clients and Wider Stakeholders

Airspace expects clients and wider stakeholders to share its commitment to environmental stewardship and respecting human rights in all aspects of their engagement with Airspace.

Airspace encourages open dialogue and collaboration to identify, prevent and address potential environmental and human rights risks and impacts associated with its business activities.

6. Breaches

Airspace reserves the right to terminate its relationship with business partners that fail to comply with this policy.

7. Governance

Senior management are responsible for overseeing this Human Rights and Responsible Sourcing Policy and ensuring it remains up to date and aligned with the organisations legal and ethical obligations. They will review the policy at least biennially and amend it where necessary, with responsibility for its ongoing relevance and effectiveness.

Signed:


Jamie Rohan
Managing Director

Date:

3/09/20