

REINO Capital ESG Strategy

REINO ESG Mission, Vision,
Strategic framework,
sustainability goals and roadmap

November 2024



Letter from CEO



At REINO Group, we believe in the importance of responsible investment creation and management. We believe this reflects the integration of environmental, social and governance (ESG) factors into investment and decision-making processes along with effective management.

The Environmental factor determines our impact on climate and natural resources. Social factor indicates, how the company manages relationships with its stakeholders: most of all its employees, investors, tenants, business partners and the communities in which it operates. Governance, on the other hand, concerns all factors contributing to and influencing the executive structure, policies and procedures as well as transparency and ethics of our business.

In 2023 we started to work on our ESG strategy - setting our long term commitments and goals concerning each of ESG factors.

The process we conducted was based on several steps – we diagnosed our initial situation, performed the Materiality Review, defined our strategic pillars and goals, and finally set the baseline values for targets and KPI's to measure our success in the ESG journey. The final step in this process was establishing the Roadmap for the next 3 to 5 years and preparing the implementation plan.

Given the climate change threat and the systemic solutions emerging in response to it, taking the actions described in our Roadmap becomes crucial. The fight against climate change is absolutely essential for the future of Europe and the world. European climate law obliges EU countries to become climate neutral by 2050. This is the result of the commitment made by the EU and its Member States when signing the Paris Agreement in 2015. Knowing how big impact real estate industry has on climate change, we feel responsible for our everyday functions. That is why, apart from the ESG Strategy, we developed our Decarbonization Strategy, that describes the road to Net Zero of our organization and its whole portfolio.

As a responsible business partner, we listen to our stakeholders and employees. Their voice was key in defining our commitments within ESG areas. The goals we set for ourselves in the developed strategic documents are ambitious, but also focused on cooperation. We are convinced that only by aiming high and cooperating throughout the entire value chain will we be able to jointly face climate and social challenges.

Our vision is to be an excelling leader in sustainable property investments and sustainable asset management. This strategy is the next step in achieving our ambitions.

Radostaw Świątkowski

CEO REINO Capital S.A.

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1. REINO Capital ESG Journey

Introduction

The REINO Capital Group is a listed holding company composed of companies operating on the commercial real estate market, with a strategic goal of dynamic growth in the value of managed assets. As part of its sustainability aspirations and in light of market evolution and stakeholder expectations, REINO Capital is committed to ensuring that the company's investments comply with environmental, social and corporate governance (ESG) goals and regulations.

The company aims to act in the best long-term interests of its investors - to achieve this, it is necessary to ensure that investments comply with international ESG standards and best practices (PRI, TCFD, etc.) and with relevant regulations such as the EU Taxonomy and the Corporate Sustainability Reporting Directive (CSRD).

To meet the above objectives, REINO Capital developed and established the comprehensive ESG Strategy and following that, the company will proceed with implementing an appropriate management system consisting of a set of policies, procedures, tools and templates that will support REINO in implementing the Strategy at all levels, including corporate, investment and company assets.

This project enabled the organization to develop an ESG culture that is relevant to its business and that empowers its teams to address ESG issues confidently and effectively, and the company's involvement in the project aims to take REINO Capital to the next level.

Developing an ESG Strategy

Developing a robust and forward-looking environmental and social management (ESG) strategy requires looking beyond the three main areas of environmental, social and governance to also consider the risks and opportunities associated with five key and interconnected ESG factors.



Building the ESG Strategy for REINO took place in five stages:



1. Initial situation diagnosis:

- Analysis of the company's current policies and procedures to identify best practices and possible gaps. Overview of REINO's previous actions concerning ESG factors.
- Legislative review of current regulations, standards, ESG frameworks and requirements.
- In addition to the legislative risk assessment, REINO Capital was also assessed against the background of competitive best-in-class companies managing entities and investments on the Polish real estate market.
- Benchmark and trends analysis and peer review - in order to better understand the general ESG landscape of the benchmark companies, and how these can influence REINO's strategy.



2. Materiality Review:

- To identify the most important ESG issues for both internal and external stakeholders and to assess the importance and impact of pre-selected sustainability topics for REINO Capital a materiality analysis was performed.
- Based on the results of key stakeholder interviews and an online survey, the results were presented using a materiality matrix. The positioning of Sustainability issues depended on their importance for stakeholder assessments and decisions, as well as their economic, environmental and social impact.



3. Decarbonization strategy - Net zero targets and roadmap:

- REINO continued the process to assess and manage greenhouse gas emissions. The company evaluated the carbon-related risks and prepared the guide to reducing its carbon footprint to zero.
- The calculation of Scope 1, 2 and 3 emissions for 2021 allowed to establish a baseline for REINO Capital to which the results of subsequent years should be compared. The analysis of the size of the carbon footprint included direct emissions and indirect energy emissions resulting from REINO operations.
- For each asset in REINO's portfolio the CRREM (The Carbon Risk Real Estate Monitor) analysis was conducted. CRREM is a tool that allows to use current consumption of a property, portfolio or business and evaluates the progress of a portfolio's carbon emission performance against targets in line with the Paris Agreement. The tool allows to develop property, portfolio, company strategies including projections of future emissions, regulations, codes, carbon pricing and decarbonisation of the grid.



4. ESG Strategy – goals and roadmap:

- Preparing forecast of the company's development direction in the field of ESG, defining long and short-term goals and setting appropriate KPIs to measure progress and success.
- Creating the detailed roadmap - the necessary action plan to successfully achieve our goals.



5. Implementation and reporting:

- Creating the necessary action and communication plan to achieve goals.
- Planning and performing trainings for employees to gain buy-in and engagement.
- Developing the ESG Data Management System, defining the scope of disclosures in the forthcoming non-financial reporting.



- Legislative review
- Peer review
- Market benchmark and trends review
- Review of internal procedures, policies, strategic frameworks
- Overview of REINO's previous ESG activities

- Stakeholders mapping
- Engagement with key stakeholders: managements interviews, external stakeholders survey, employee survey
- Identify material issues – Materiality Matrix

- Mapping sources of GHG emissions
- Data collection, carbon footprint calculation
- Setting carbon footprint baseline – organization and asset level
- Energy audits and CRREM analysis
- Preparing Decarbonization Strategy

- Pillar's setting
- ESG long and short-term objectives
- Defining KPIs to measure success
- ESG Policy Statement
- Preparing Roadmap

- Implementation and communication plan
- Workshops / trainings for internal stakeholders
- Working on ESG Reporting

Key ESG topics for REINO based on Materiality Assessment

Being aware of the impact that real estate industry has on the Planet and on people, we feel responsible for minimising this effect and for making our investments in the most ethical and compliant with regulations way.

The results of the conducted Materiality Assessment translated into scores, were plotted in the materiality matrix. The axis showed how significant the particular ESG topics are according to:

- external stakeholders' expectations and the influence on stakeholders' assessment and decisions;
- the impact of the company on the environment, society or economy (based on employee assessment).

The following topics emerged as the most material ones based on both dimensions. **All of the topics are inextricably linked to the UN Sustainable Development Goals (SDGs):**

Environment

- Reduction of negative impact on climate change
- Energy efficiency & consumption
- Use of renewable energy
- Buildings certifications
- Limiting waste generation & increasing recycling
- Water efficiency & responsible consumption

Second-level:

- Minimising impact on biodiversity
- Environmental impact of project development
- Air pollution & quality

7 AFFORDABLE AND CLEAN ENERGY

9 INDUSTRY INNOVATION AND INFRASTRUCTURE

11 SUSTAINABLE CITIES AND COMMUNITIES

13 CLIMATE ACTION

15 LIFE ON LAND

Social

- Employee wellbeing, health & safety at work

Second-level :

- Work-life balance
- Diversity and inclusion in the Group
- Tenant Health & Safety
- Human Rights in supply chain

3 GOOD HEALTH AND WELL-BEING

8 DECENT WORK AND ECONOMIC GROWTH

10 REDUCED INEQUALITIES

Governance

- Ethics & compliance
- Tenant Satisfaction
- Cybersecurity

Second-level :

- Data protection & privacy
- Sustainable supply chain

8 DECENT WORK AND ECONOMIC GROWTH

16 PEACE, JUSTICE AND STRONG INSTITUTIONS

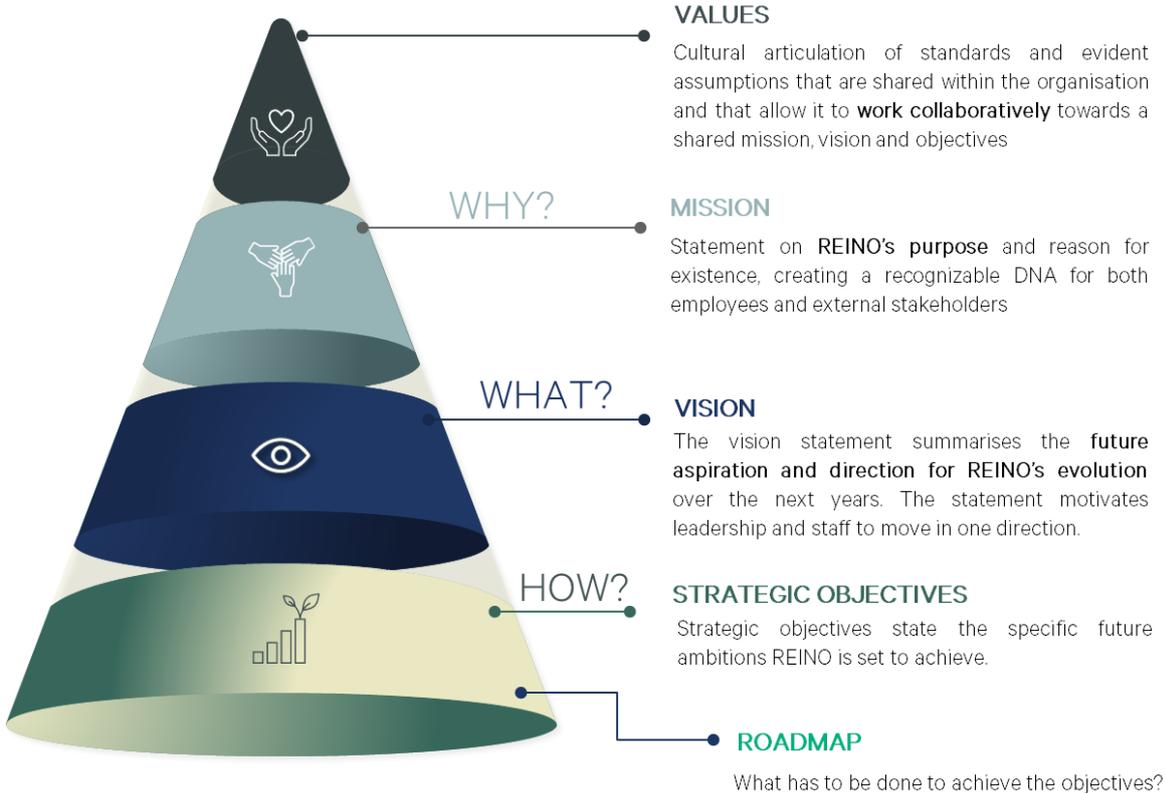
Using the Materiality Assessment as a starting point, the Sustainability Strategy for REINO Capital and its portfolio was developed. For each of the above areas, short, mid and long-term goals have been defined, to be achieved until the end of 2035.

2. Where are we heading? REINO's ESG Strategy

Introduction

ESG Strategy needs to be fully integrated with the company's business strategy and support their ambitions. We have included four strategic layers in the framework of our ESG policy:

- Recognized Values,
- Compelling Mission
- Clear vision & ambitions
- Tangible strategic commitments and objectives.



The commitments and objectives were set around three pillars that address key environmental, social and governance trends and material topics defined in the Materiality Assessment.

REINO's teams were challenged to set ambitious objectives within each pillar. The established objectives are outcome focused, assuming a leadership position in the market.

Our objectives are underpinned by a set of KPIs against which success will be monitored and reported. Our ESG Strategy brings together the comprehensive body of work undertaken during the whole strategic process, including the key outputs and insights from the materiality assessment, risk management and baseline setting stages.

It reflects our DNA and values, and our commitment to sustainable development and responsible investing. It also shows our engagement in fulfillment of the selected UN Sustainable Development Goals.

REINO's Values

Our values define the main principles of operation, standards of business conduct and guidelines for how we act. This is our "road code". **Sustainability is one of the 9 key values**, that guide our investments. All the others directly or indirectly refer you to at least one of the 3 ESG areas: ethics and quality of business conduct, care for people and relationships, resilience, agility and a long-term view of the environment around us:

<p>FIDUCIARY</p> <p>We put the <u>Clients' interests first</u> at all times</p>	<p>EXCELLENCE</p> <p>We are passionate about providing products and services of the highest standard</p>	<p>INTEGRITY</p> <p>We build trust through ethical actions and honest relationships</p>	
<p>RESPECT</p> <p>We value everyone and treat others with dignity and professionalism</p>	<p>ACCOUNTABILITY</p> <p>We empower each other to take responsibility for our actions</p>	<p>TEAMWORK</p> <p>We achieve more when we collaborate and work together</p>	
<p>SUSTAINABILITY</p> <p>We actively contribute to the safer and cleaner ecosystem, more sustainable economy and better social standards</p>	<p>AGILITY</p> <p>We adjust quickly and revitalize our organization in response to a rapidly-changing, environment</p>	<p>LONG-TERM VIEW</p> <p>We look beyond the present to deliver future value</p>	

REINO's Mission and Vision

REINO provides the highest standard of services, as our Clients' most trusted partner of choice in Central Europe, in the scope of alternative assets, predominantly in the real estate investment and asset management industry.



OUR MISSION:

is to combine our local presence with global expertise in order to achieve most attractive returns for our Clients, while actively contributing to a sustainable economy and society, in compliance with the highest corporate governance standards for the ultimate long-term benefit of our Investors.

Building on our Teams' expertise, experience and capabilities, when providing **solutions for our Clients' needs**, we want to deliver **products and services of the highest standards** and aspire to fulfil our vision.



OUR VISION:

1. Be our Clients' most trusted and professional investment & asset manager
2. Be our Clients' preferred partner for all alternative assets in Central Europe
3. Be the employer of choice for the best experts and most talented people in the market
4. Be excelling leader in the sustainable property investment & asset management

ESG Strategy Framework - Strategic Pillars and Commitments

We are aware of the scale of the actions that lie ahead of us in order to effectively **combat climate change** and environmental degradation. We also believe that **cooperation across the entire value chain** is needed in this respect. That is why we are convinced that our most valuable resource is **people**, our employees and co-workers, as well as relationships with clients and local communities. We want to jointly develop human capital, invest in the competences and well-being of people around us. As an organization, we want to develop based on our values and **strong ethical foundations**. We are aware that our development depends on good teamwork and the trust of our business partners. That is why we focus on respect, honesty and loyalty, which we support with transparent business conduct.

This holistic approach to cooperation and sustainable development is reflected in our ESG strategy, which touches on all three areas: the environment, social issues and corporate governance. Therefore, the framework of our strategy is based on 3 main pillars:

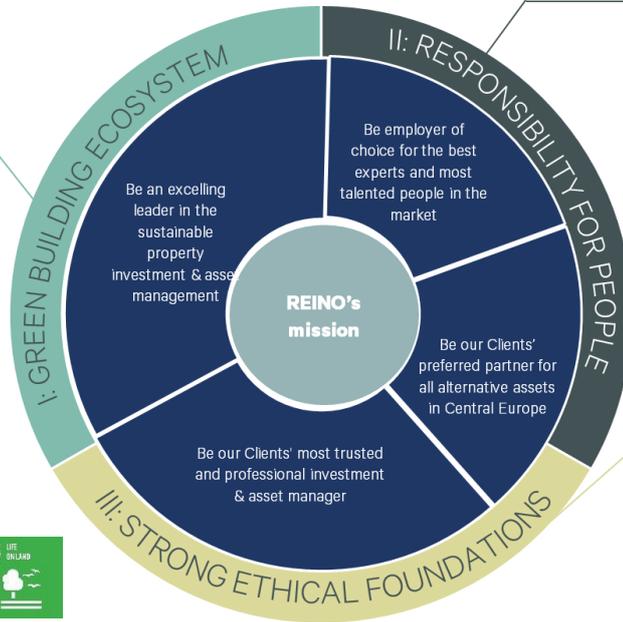
- I. **Green building ecosystem** – We are working together with our business partners in the whole value chain towards the sustainable, green real estate ecosystem.
- II. **Responsibility for People** - We collaborate responsibly with our employees, investors and tenants, building our business relationships on trust and respect.
- III. **Strong Ethical Foundations** – We are working together with our business partners on strong ethical foundations for a transparent business.

Based on the assessment of material topics matrix, in line with our values, mission and vision, we defined our long-term commitments, and for each of them we established our targets which were underpinned by a framework of KPIs (indicators) against which we measure, monitor and report the success.



OUR COMMITMENTS:

1. Reduction of negative impact on climate change
2. Increase energy efficiency, reduce consumption and greening energy sources
3. Waste management towards circularity
4. Aim for the highest green building standards & certification
5. Preserving and improving biodiversity



OUR COMMITMENTS:

1. Securing the health and wellbeing of people close to us
2. Building a company culture valuing diversity and equal opportunities
3. Run business in harmony with local communities
4. Accessibility for all



OUR COMMITMENTS:



1. Strong ethical culture
2. Compliance with laws and regulations
3. Sustainable supply chain management
4. Providing products and services of the highest standard
5. Respect for human rights



3. What we want to achieve? REINO's sustainability commitments and targets.

REINO's teams were challenged to set ambitious objectives within each strategic pillar. The proposed objectives are outcome focused, assuming our leadership position in the market. The timeframes for reaching the goals set out definite actions, also assigning specific deadlines for implementation.



PILLAR I: Green building ecosystem

Our ambition is to be an excelling leader in the sustainable property investment & asset management. Being aware of the efforts needed to transform the European economy towards carbon neutrality by 2050 and having in mind risks that climate change can bring to our business and to the people we care the most, we struggle to reduce the negative impact of the buildings on climate change. We value all limited resources and biodiversity and do not want real estate to contribute to the extinction of species, waste of resources and littering the planet.

We understand that responsibility for our planet lies across the entire value chain and we know our role in redirecting real estate investments towards more sustainable ones. That is **why we are working together with our business partners in the whole value chain towards the sustainable, green real estate ecosystem.**





Long term commitments:

<p>1. Reduction of negative impact on climate change</p>	<p>2. Increase energy efficiency, reduce consumption and greening energy sources</p>	<p>3. Waste management towards circularity</p>	<p>4. Aim for the highest green building standards & certification</p>	<p>5. Preserving and improving biodiversity</p>
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2027 TARGETS (Mid – term objectives):

<p>Reduce carbon / GHG emission in own operations in scope 1 and 2 by 25% by 2027 relative to headcount - baseline 2021</p>	<p>Reduce energy consumption in own operations by 15% by 2027 (linked to carbon target)</p>	<p>Reduce the amount of waste sent to landfill by 50% by 2027</p>	<p>100% of assets with green certification by the end of 2024</p>	<p>Increase the share of onsite natural habitat of at least 5% of GLA in logistic assets</p>
<p>Reduce carbon / GHG emission in scope 3 by 40% by 2027 (waste / business travels / commuting to work) relative to headcount - baseline 2021</p>	<p>Reduce energy consumption in all assets by 15% by 2027 (linked to carbon target)</p>		<p>Min Very Good BREEAM standard for logistics assets</p>	<p>Increase the greenery space and biodiversity around / in office and logistics assets</p>
<p>Reduce carbon / GHG emission in scope 3 by 20% by 2027 in all managed assets (portfolio level)</p>	<p>Increase the amount of purchased green energy to at least 75% of assets every year (only as PPA)</p>		<p>Min Excellent BREEAM standard / LEED Gold standard for office assets</p>	<p>0% of investments in naturally sensitive or protected areas</p>
	<p>40% of consumed electricity covered by renewable energy</p>		<p>Set a minimum BREEAM in Use standard / LEED EBOM standard for existing properties</p>	

2035 TARGETS (Long – term objectives):

<p>Reduce carbon / GHG emission in own operations in scope 1 and 2 by 50% by 2035 relative to headcount - baseline 2021</p>		<p>Achieve zero waste to landfill by 2030</p>		
<p>Reduce carbon / GHG emission in scope 3 by 60% by 2035 (waste / business travels / commuting to work) relative to headcount - baseline 2022</p>		<p>Zero waste is the principle of minimizing waste production as much as possible, then, composting, reusing, or recycling any other waste generated. Today, zero waste includes the 5 Rs: refuse, reduce, reuse, recycle and rot</p>		
<p>Reduce carbon / GHG emission in scope 3 by 50% by 2035 in all managed assets (portfolio level)</p>				

Key Performance Indicators (KPI)

<p>Amount of carbon emitted tCO₂e and kgCO₂e/FTE/yr (comparison YtoY) in scope 1 and 2</p>	<p>Energy consumption (kWh) and (kWh/m²/yr) - % or reduction year to year</p>	<p>Amount of waste generated (kg / t)</p>	<p>Number and % of certified buildings % of change year to year</p>	<p>Share of onsite natural habitat % of investments in naturally sensitive or protected areas</p>
<p>Amount of carbon emitted tCO₂e and kgCO₂e/m²/yr (comparison YtoY) in scope 3 (own operations)</p>	<p>Number of assets where green energy has been purchased</p>	<p>Share of waste diverted from landfill (%)</p>	<p>Level of certifications % of change year to year</p>	
<p>Amount of carbon emitted tCO₂e and kgCO₂e/m²/yr (comparison YtoY) in scope 3 (in managed assets - portfolio level)</p>	<p>Percentage of renewable energy coverage</p>	<p>Share of recycled waste (%)</p>		



PILLAR II: Responsibility for people

Teamwork is one of our most important values. People are in the heart of our business and we are aware their needs and expectations. Being aware of the impact that workplace conditions have on our employee and tenants, we care the most about securing health and wellbeing for them.

We want to be the employer of choice for the best experts and most talented people in the market. On the same time we build our business relationships on trust and respect. We value diversity and see strength in diverse teams that focus primarily on competence, knowledge and experience, regardless of gender, age or nationality. That is why equal opportunities and equal accessibility for all are in the centre of our interest.

Collaborating responsibly with our employees, clients and tenants is the second pillar of our ESG strategy.





Long term commitments:

<p>1. Securing the health and wellbeing of people close to us</p>	<p>2. Building a company culture valuing diversity and equal opportunities</p>	<p>3. Run business in harmony with local communities</p>	<p>4. Accessibility for all</p>
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2024 TARGETS (Short – term objectives):

<p>Zero work-related accidents during whole year, starting from 2024</p>	<p>Ensure clear and transparent remuneration policy and equal possibilities of promotion and development for all employees</p>	<p>Involve the company management in important initiatives for local communities at least once a year starting from 2024</p>	
<p>Engage annually at least 50% of employees in regular health and wellbeing activities, starting from 2024</p>	<p>Ensure 10 hours a year of personal development trainings for (each) an employee on average</p>	<p>Engage employees in 5 hours of volunteering (on average) per employee per year</p>	

2027 TARGETS (Mid – term objectives):

<p>Increase tenant's satisfaction level, aiming at 90% of NPS (Net Promoter Score) and maintain it</p>	<p>Ensure company culture based on values and equal rules for all - the company values are known for 70% of employees – till 2025</p>	<p>Allocate 0.5% of EBITDA to community related projects (e.g. 0,5-1%) provided that expenditures in the SPVs (i.e. portfolio asset companies) are calculated in</p>	<p>Obtain barrier-free facility certificate (or alternative) for all office assets till 2027 and for new assets within two years from acquisition</p>
<p>Obtain WELL Health and Safety certification (or alternative) for at least 50% offices assets till 2027</p>			<p>Make all assets accessible for all relevant vulnerable groups (defined based on certification results)</p>

Key Performance indicators (KPI)

<p>Zero LTIF (lost-time injury frequency)</p> <p>Number of employees taking part in well-being activities</p> <p>Frequency of clean-ups in office and common areas</p> <p>NPS from tenant's satisfaction survey</p>	<p>Number / % of employees with personal development plans set</p> <p>Number of trainings hours per employee per year</p>	<p>Share of expenditures allocated to communities (%)</p>	<p>Number and quality of projects in which the Group is involved</p> <p>Number of hours spent on volunteering activities</p> <p>Number of assets certified (<i>number of assets or number of vulnerable groups</i>)</p>
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Number of WH&S certifications obtained

Number of days where air quality is below threshold (CO2, PPM, etc.)

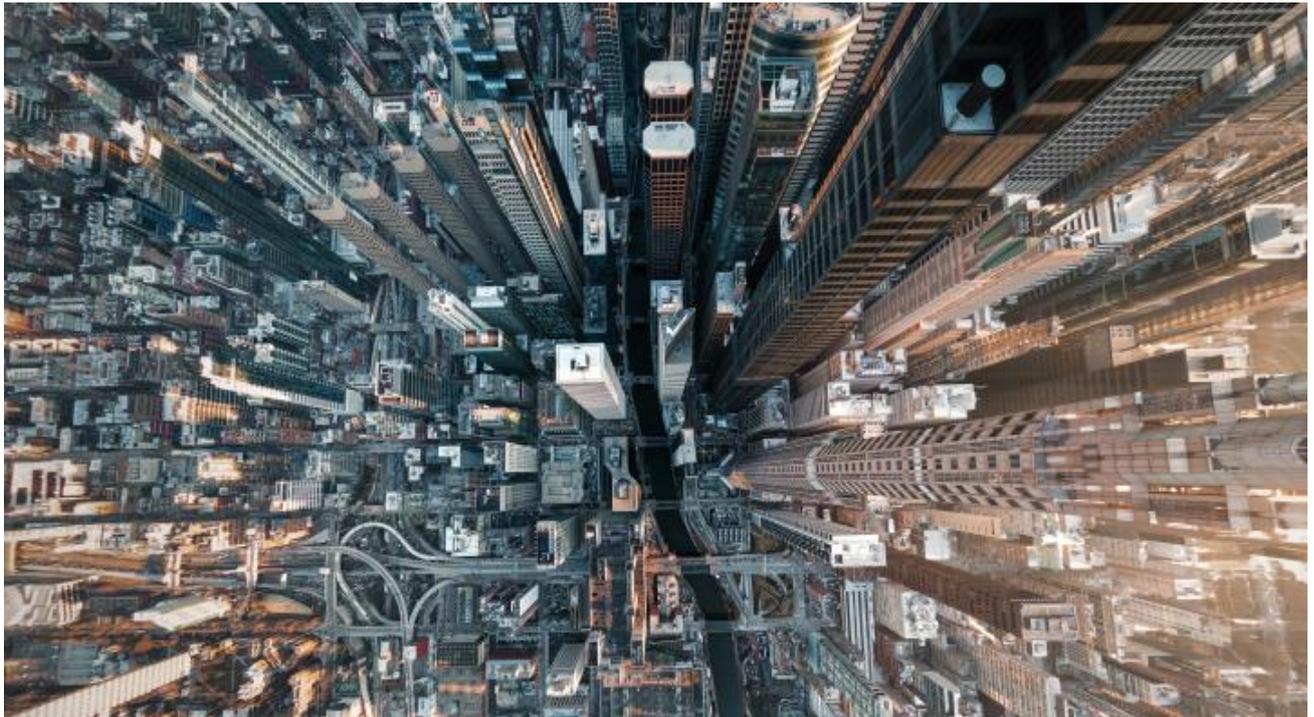


PILLAR III: Strong ethical foundations

We are passionate about providing **products and services of the highest standard**, however, it is crucial for us to build **trust and honest relationships** based on strong ethical company culture. Our ambition is to be our Clients' most trusted and professional investment & asset manager and most preferred partner for all alternative assets in Central Europe.

We do not accept any manifestations of dishonesty or abuse in our value chain and respecting human rights is an absolute priority for us. Therefore, we ensure high ethical standards of management and compliance of our policies and contracts with current regulations. We also plan to increase the transparency of our sustainable activities and develop non-financial reports according to new reporting standards.

We are aware, that code of conduct should be respected by all our business partners. That is why we are **working together on strong ethical foundations for a transparent business.**





Long term commitments:

<p>1. Strong ethical culture</p>	<p>2. Compliance with laws and regulations</p>	<p>3. Sustainable supply chain management</p>	<p>4. Respect for human rights</p>
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2024 TARGETS (Short – term objectives):

<p>Zero tolerance on serious code of conduct breaches - keep the number of violations equal to zero every year – starting now</p>	<p>Zero cases of non-compliance with regulations – starting now</p>	<p>100% of suppliers to become acquainted with our Supplier Code of Conduct by the end of 2024</p>	<p>Zero human rights breaches identified in operations and in assets manager every year starting from 2024</p>
		<p>Report annually on ESG performance (non-financial reporting in line with CSRD and EU Taxonomy, starting from 2025)</p>	<p>Zero discrimination incidents reported to the ethics committee each year starting form 2024</p>

2027 TARGETS (Mid – term objectives):

<p>All employees and business partners to sign the code of conduct (while on-boarding or annually)</p>		<p>100% of suppliers to sign our Supplier Code of Conduct by the end of 2026</p>	
<p>All members of the top management have the annual sustainability goals defined and linked to variable remuneration (to discuss if based on assessment or strictly quantifiable)</p>		<p>Sustainability is part of all procurement evaluation processes in a tailored manner – from 2027</p>	

Key Performance indicators (KPI)

<p>Number of serious breaches to code of conduct</p> <p>Number and percentage of signatory parties of CoC</p>	<p>Number of serious breaches of regulations and procedures</p>	<p>Number and percentage of suppliers acknowledged with / signing the supplier code of conduct</p> <p>Number of procurement evaluation processes integrating sustainability criteria (social and/or environmental)</p>	<p>Number of identified human rights breaches</p> <p>Number of discrimination incidents</p>
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Report issued annually / External verification of the reported KPIs

4. What we plan to do? Roadmap of sustainable activities.

As part of individual strategic goals, REINO is already implementing and will continue to implement specific projects and activities that bring us closer to fulfilling our commitments each year.

When developing the roadmap for this ESG Strategy, we conducted an analysis of the effectiveness of individual projects, through the prism of their potential effects, efforts and costs. In this way, we have planned primarily the most important large projects and those that bring the fastest results on the timeline, prioritizing the most effective activities. This roadmap is a ranking of initiatives, in terms of their efficiency, starting from 2024.

The planned initiatives have been assigned to the implementation of individual goals, also taking into account the implementation of SDG's and green certificates. We also took into account current regulations and trends and identified ESG risks.

Activities within *Green building ecosystem* pillar.

Our commitments:	Activities, ESG Initiatives:	Starting date:	Recurrency	Responsibility
Reduction of negative impact on climate change	Calculate carbon emission baseline (2022) - Scope 1-2	2023	Annual	Asset Management + SA + Corporate
	Calculate carbon emission baseline (2022) - Scope 3	2023	Annual	Asset Management + SA + Corporate
	Conduct energy audits and CRREM analysis in the whole portfolio to set baseline	2023	Repeat after significant changes	
	Create the decarbonization strategy and set the targets against the 2022 baseline	2023		Asset Management + ClmO + Corporate
	Roll out education plan and it's execution for employees and business partners to achieve target	2024		Corporate + Asset Management
	Investigate feasibility of electric vehicle fleet	2024		Management
	EU Taxonomy verification of the whole portfolio and new assets	2024	Annual	Asset Management + SA
	Align with SBT Initiative and approve the NZC goals	2025		Asset Management
Asset level improvements and CAPEX investments defined in NZC strategy	According to NZC Strategy		Asset Management + SA	

Our commitments:	Activities, ESG Initiatives:	Starting date:	Recurrency	Responsibility
Increase energy efficiency, reduce consumption and greening energy sources	Development of educational programme for employees	2024		Corporate
	Development of educational programme for tenants	2024		Asset Management + Corporate
	Investigate feasibility of using alternative energy sources	2024		Asset Management + SA
	Introduction of green lease agreements with tenants	2024		Asset Management + Corporate
	Implementation of a mechanism for collecting and monitoring data on the consumption of utilities (energy, heat, water) from own activities	2025	Annual	Asset Management + SA
	Implementation of a mechanism for collecting and monitoring data on the consumption of utilities (energy, heat, water) on all investments managed by REINO	2025		Asset Management + SA
	Prepare and distribute building user's manual in terms of sustainability	2025		Asset Management + Corporate
	Implementation of a certified ISO 50001 energy management system	2026		Asset Management + SA

Our commitments:	Activities, ESG Initiatives:	Starting date:	Recurrency	Responsibility
Waste management towards circularity	Conduct waste management audit to define action points on waste management at the assets managed and office behaviour, etc.	2024		Asset Management + SA
	Reduce waste in own offices and in assets to near zero: - electronic circulation of documents; - implementation of a lean printing policy; - eliminate single use plastics - from assets and own office; - elimination of plastic bottles / water filters; - collection and disposal of electro-waste by specialist companies;	2024		Corporate

	Provide proper education about waste segregation for employees and tenants to increase segregation	2024		Corporate
	Implementation of sustainable procurement policy	2024		Corporate + Legal
	Recycle residual waste	2026		Corporate
	Investigate management of more waste streams, e.g. organic waste (assets managed);	2027		Asset Management + SA
	Implement composting policy	2027		Corporate + Legal

Our commitments :	Activities, ESG Initiatives:	Starting date:	Recurrency	Responsibility
Aim for the highest green building standards certification	Integration of certification requirements early in the investment process - set the Green Certification Policy for new investments	2024	Annual	Asset Management + Management
	Educate tenants and other stakeholders	2024		Asset Management + Management
	Monitor market to check the availability of new certifications	2024	Annual	Asset Management + Management
	Provide pre-certification when necessary	2024		Asset Management + SA
	Certify and recertify buildings according to the highest possible certifications level satisfying tenant and buy side requirements.	2026		Asset Management + SA

Our commitments:	Activities, ESG Initiatives:	Starting date:	Recurrency	Responsibility
Preserving and improving biodiversity	Measure current share of natural habitat in and around properties	2024	Annual	Asset Management + SA
	Investigate feasibility of expanding or installing greenery in / on / around the buildings	2024	Annual	Asset Management + SA
	Develop an engagement programme for employees and tenants to jointly create places with greenery	2024	Annual	Asset Management + Corporate
	Develop the biodiversity / environmental policy defining company's approach to biodiversity issues and environmentally sensitive areas	2024	Review every 3 years	Legal + Asset Management + Corporate
	Inclusion of aspects of potential local threats to biodiversity beyond business activities as part of the decision-making criteria - commitment not to undertake investments in naturally sensitive areas or in protected areas (national parks, landscape parks, nature reserves, Natura 2000 sites)	2024		Corporate + Management
	Support local organization / programme / initiative which aim is to preserve biodiversity	2025		Asset Management + Corporate

Activities within *Responsibility for people* pillar.

Our commitments:	Activities / ESG Initiatives:	Starting date:	Recurrency	Responsibility:
Securing the health and wellbeing of people close to us	Assignment of managerial responsibility in the area of OHS	2024		Corporate + Management
	Ensure and monitor regularly availability of health care services on-site	2024	Annual	Corporate + Asset Management
	Build action plan on health and wellbeing activities , engaging people in sport activities	2024	Annual	Corporate + Marketing
	Set baseline for NPS score in satisfaction survey for tenants	2024		Asset Management
	Conduct Health & Safety (OHS) and wellbeing risk assessment	2025	Annual	Corporate+ Asset Management
	Use criteria specified in WELL certificate, e.g. specific disinfection and cleaning procedures, to create or update H&S policy	2025	Review every 3 years	Corporate
	Elaborate emergency plans and include them in H&S Policy	2025		Corporate
	Implement strict hygiene conditions at offices and assets	2025		Corporate + Asset Management
	Investigate introduction of H&S management and/or monitoring system (ISO 45001, OHSAS 18001, etc) at least in industrial assets	2025		Asset Management+ RIL Management
	Conduct Tenant's satisfaction survey in all assets	2025	Every second year	Asset Management
	Conduct regular air quality tests in the buildings		Annual	Asset Management

Our commitments:	Activities / ESG Initiatives:	Starting date:	Recurrency	Responsibility:
Building a company culture valuing diversity and equal opportunities	Conduct discrimination and work-life balance survey among employees	2024	Every second year	Corporate
	Review and update of remuneration policy in terms of equal pay practices	2024	Review every 3 years	Corporate + Legal + Management
	Introduce a Diversity and Inclusion policy based on results	2024	Review every 3 years	Corporate + Legal
	Introduce a policy of employee privileges and benefits	2024		Corporate + Legal
	Develop a remote working policy and guidance	2024	Review every 3 years	Corporate + Legal
	Set clear and transparent rules and policy of the company support in terms of personal development trainings	2024	Review every 3 years	Corporate
	Assignment of managerial responsibility in the area of OHS	2025		Management
	Conduct annual employee satisfaction survey	2025	Annual	Corporate
	Set up personal development plans for employees	2025	Annual	Management

Our commitments:	Activities / ESG Initiatives:	Starting date:	Recurrency	Responsibility:
Run business in harmony with local communities	Engage community stakeholders and start dialogue on needs related to asset development and operations. Include the results in social engagement strategy.	2024		Asset Management + Management
	Investigate on employee interest in seasonal volunteering, establish rules and incentives for volunteers	2024		Corporate + Management
	Develop social engagement strategy and plan	2025	Review every 3 years / Annual	Corporate + Asset Management + Management

Our commitments:	Activities / ESG Initiatives:	Starting date:	Recurrency	Responsibility:
Accessibility for all	Initiate certification process on all assets with the foundation "Objekt bez barier"	2025		Asset Management
	Improving accessibility of the buildings based on results of certification	2025		Asset Management

Activities within *Strong ethical foundation* pillar.

Our commitments:	Activities, ESG Initiatives:	Starting date:	Recurrency	Responsibility:
Strong ethical culture (Anti-corruption – ABAC)	Create and popularize a code of conduct	2024	Review every 3 years	Corporate + Management
	Establish the Ethics Committee and popularize it's duties	2024		Corporate + Management
	Create and popularize ethical procedures (Non-discrimination Policy, Anti-bribery / Anti-Corruption Policy)	2024	Review every 3 years	Corporate + Management + Legal
	Implement and popularize transparent and secure whistleblowing system and procedures. Encourage reporting and whistleblowing via communications and anonymous complaint channels (speak up culture / Whistle B mechanism)	2024		Corporate + Legal + Management
	Prepare and conduct obligatory training session on Whistle B mechanism	2024	Repeat for new employees annually	Corporate
	Implement compliance topic into the onboarding trainings;	2024		Corporate
	Define sustainability objectives linked to variable remuneration and include this into the group-wide policy	2025	Annual	Management

Our commitments:	Activities, ESG Initiatives:	Starting date:	Recurrency	Responsibility:
Compliance with laws and regulations	Prepare and conduct compliance annual trainings for all employees	2024	Annual	Legal + Corporate
	Monitor and report legal compliance quarterly	2024	Annual	Corporate + Legal + Audit

Our commitments:	Activities, ESG Initiatives:	Starting date:	Recurrency	Responsibility:
Sustainable supply chain management (Suppliers social / environmental assessment)	Development of ESG Strategy - setting goals and establishing KPIs. ESG Strategy sign-off	2023	Review every 3 years	Corporate + Management
	Preparing Communication Plan for ESG Strategy. Gaining buy-in in the organization.	2023		Corporate + Marketing
	Prepare a supplier code of conduct	2024	Review every 3 years	Corporate + Legal + Asset Management
	Prepare the communication plan and conduct the communication campaign of the supplier code of conduct	2024		Asset Management + Marketing
	Prepare a supplier risk assessment based on supply chain and sustainability criteria / Suppliers ESG Assessment	2024		Corporate + Asset Management
	Develop and implement a Sustainable Supply Chain Policy	2024	Review every 3 years	Corporate + Legal
	Monitor performance of suppliers and define capacity building needs	2024		Asset Management
	Prepare and implement ESG check list / technical / ESG DD before purchasing	2024	On regular basis	Corporate
	ESG training programme for all responsible for the reporting process	2024	Annual	Corporate
	Define set of disclosures and prepare the system of collecting data	2024		Corporate
	EU Taxonomy compliance verification / Taxonomy reporting	2024	On regular basis / Annual	Compliance
	Prepare and communicate annual non-financial report	2024	Annual	Corporate + Management + Marketing
Send the SCC to all stakeholders and collect the confirmation of acknowledgement	2026	On regular basis	Corporate	

Our commitments:	Activities, ESG Initiatives:	Starting date:	Recurrency	Responsibility:
Respect for human rights	Identification and assessment of vulnerable groups susceptible to suffer human rights breaches	2024		Corporate
	Include Human Rights matter in Company Code of Conduct	2024		Corporate + Management + Legal
	Prepare and introduce a non-discrimination policy	2024	Review every 3 years	Legal + Corporate
	Monitor and report on incidents and remediation activities	2024	Annual	Corporate + Compliance
	Set up and operate anonymous grievance (complaint) mechanism / Whistle B mechanism	2025		Corporate + Legal

5. Conclusions

At REINO we believe in the importance of responsible investment. We know that this reflects the integration of Environmental, Social, Governance factors into investment processes and decision making alongside effective stewardship.

If we want to place REINO in the real estate investment market as an example of excellence, combining financial returns with sustainability performance, we need rethink our “business as usual”. ESG is no longer a “nice to have”. Our clients and investors in general, are becoming more and more demanding regarding ESG. Identifying the possible ESG-related risks, and having a plan to deal with them becomes fundamental for REINO attractiveness as an investment partner.

We have set long-term goals for 2035, as well as mid-term objectives for 2027, which include reducing carbon and greenhouse gas emissions, increasing energy efficiency, managing waste, preserving biodiversity, and maintaining high green building standards. These goals are aligned with the EU's commitment to climate neutrality by 2050.

It is fundamental to share our ESG approach with all the stakeholders, both internal and external, as only through cooperation in the whole value chain we can all achieve our goals.

We will not only put our best efforts to ensure that this ESG Roadmap is effectively implemented. At the same time, we are going to develop a transparent communication of its evolution, which will be reflected in our ESG report.

Thank you

For more information

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