

*N.B. The English text is an in-house translation.*

# Sustainability Policy

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Adopted by: Board of Directors

Adopted: 23-12-07

Last updated: [Date]

Updated by: [Role]

## SUSTAINABILITY POLICY

This policy is applicable to all employees of Nordiqus AB and Nordiqus AB:s group companies, hereinafter referred to as the "Company". When this policy refers to the company, if nothing else, Nordiqus AB and its group companies are mentioned.

### 1. Introduction

The purpose of the Policy is to define The Company's position and guidelines for participation in building a sustainable society. The Company stands behind the Paris Agreement's Climate Goals, the UN's Global Goals for Sustainable Development, and the Global Compact's Ten Principles for Sustainable Business. Sustainability is a natural part of The Company's business model.

The Company's Board of Directors annually establishes a Code of Conduct, Whistleblower Policy and Sustainability Policy as well as sets sustainability goals. The Sustainability Policy covers all The Company's operations and applies to all companies within the Group.

The concept of sustainability includes the following dimensions:

- Economic
- Ecological
- Social

### 2. Extent

Sustainability permeates all work within The Company. The Sustainability Policy covers all employees and all parts of The Company's operations, including partners. All employees, including all managers, subsidiaries, and partners, have a responsibility to stay informed about the Sustainability Policy as well as other policies applicable to the company and applicable legislation.

The Sustainability Policy is supplemented by the Code of Conduct, which defines guidelines for action in matters such as ethics, anti-corruption, professional action, work environment, gifts, bribes, inside information, communication, integrity, discrimination and compensation.

To ensure that managers and employees act in accordance with The Company's ethical guidelines, a whistleblower service is available. The service is handled externally. Guidelines for the whistleblower service can be found in The

## 3. Principles

The Company shall follow the principles below and appoint a member of senior management as responsible for each of the principles:

- Work to minimise The Company's environmental impact and energy use in new-builds and property management.
- Consider the environmental impact from a life cycle perspective.
- Minimise the environmental impact of transport.
- Strive towards never using materials that are classified as environmentally hazardous. Every deviation from this shall be registered in a follow-up system and approved by an appointed employee with responsibility for quality management.
- Protect ecosystems, biodiversity and minimize disturbances on land and in water in own operations and in the supply chain. Effects on ecosystems, biodiversity, land and water are evaluated and weighed in all property development processes.
- Minimise waste, utilise waste and resources in a responsible manner.
- Comply with laws and regulations and cooperate so that The Company's environmental work is designed in agreement with society's environmental goals.
- Inform partners and suppliers about The Company's sustainability work and requirements.
- Audit of safety in operations and in properties and minimize safety hazards for employees, contractors, and tenants.
- Apply mitigation hierarchy (avoid, minimize, restore and offset), precautionary principles, involve authorities and local communities when operating close to areas of critical importance and need of protection such as sites of cultural heritage (for example world heritage sites and IUCN Category I-IV), key habitats, nature reserves, green areas, agricultural land etc.
- Involve local communities in the dialogue process in all property

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development.

- Evaluate and manage risks related to climate change. This includes physical risks, regulatory risks, market risks and other transition risks. This evaluation shall be disclosed publicly in accordance with TCFDs recommendations.
- Publicly disclose updated and material sustainability data, fulfilment of sustainability goals, sustainability risks and incidents.

## 4. Vision and Targets

The company shall govern its operations in line with the international climate agreement (Paris agreement) with the overarching target of climate neutrality by 2030 and a property portfolio adapted to minimize climate related risks. The company shall apply a life cycle perspective on its operations and adopt a responsible use of natural resources and promote biodiversity. The company management shall procure that strategies and action-plans are developed as well as concrete targets and key performance indicators to govern the company operations in line with the overarching targets. The key performance indicators and target fulfilment shall be disclosed publicly on an annual basis.

Operational goals and strategies in 1-5 years' time within the three sustainability dimensions are prepared by The Company's management team in consultation with the Board of Director's Sustainability Committee and are adopted annually by the Board of Directors. The operational goals are specific, measurable, set within a time frame and assigned to the responsible manager.

All employees are responsible for knowing and understanding the company's vision and goals, understanding how they relate to their own role and contributing to achieving them by applying and further developing the company's working methods and methods for sustainable community building.

## 5. Governance and Responsibility

The Company must be transparent in its follow-up and reporting of environmental goals, impact and risks.

The CEO is ultimately responsible for the identification and management of sustainability related risks. The risk assessment is carried out together with senior management, the Head of Sustainability, and external experts in material

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topics such as climate risk. In property transactions, sustainability risks are included in the mandatory due-diligence process.

The CFO and the responsible manager for each goal continuously follow up the sustainability goals in consultation with the CEO. Fulfilment of the goals is compiled and reported annually to the Board of Directors and in the Annual Report. The CEO is responsible for review and progress of the work with the sustainability goals, management of sustainability risks and compliance with the Sustainability Policy and Code of Conduct.

An internal Sustainability Council consisting of key employees from different parts of The Company including representatives from senior management works with the execution of the operational sustainability goals. Internal regulations and a framework have been developed to support the fulfilment of the goals and ensure a consistent and high quality:

- Environmental- and Quality Management System
- Sustainability Annex for projects
- Other official policies approved by the Board of Directors

The Company's environmental impact and environmental risks are monitored and reported annually in the Annual Report. Focus areas and relevant indicators for accounting are designated in dialogue with stakeholders, such as tenants, investors, lenders, employees and with research-based knowledge of the business' sustainability- related risks and opportunities.

Read in conjunction with:

- Code of Conduct
- Whistleblower Policy
- Environmental- and Quality Management System