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# SUSTAINABILITY REPORT 2023

# Agenda

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From the left:  
Michał Białas, Chris Zeuner



## Letter from the Executive Board

Dear Stakeholders,

We are pleased to present 7R Group's Sustainability Report, prepared for the first time according to the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). By doing so one year ahead of these standards becoming mandatory, we demonstrate our commitment to transparency and our readiness to responsibly prepare for the new reporting requirements. Sustainability is an integral part of our business strategy, and this report outlines our objectives set within our revised ESG Strategy, including our actions for the environment, people, and ensuring ethical and transparent corporate governance.

In line with the new standards, our reporting is based on a double materiality analysis, conducted for the first time for 7R Group. This analysis assesses both our impact on people and the environment, as well as external influence on our financial position. The double materiality analysis has been pivotal in defining our strategic objectives for the coming years, and the insights gathered serve as a solid foundation for shaping our future actions.

Before publishing this report, we adopted an ESG Strategy with a 2030 outlook, centred around our tenants, environmental protection, social issues, and corporate governance. A key addition to the existing strategy is an additional pillar: *Add Value for Our Clients*. Here, we focus on increasing tenant satisfaction by meeting their expectations and building needs and raising awareness of sustainable warehousing solutions. We are committed to increasing the number of lease agreements containing sustainability clauses and are implementing an Anti-Greenwashing Policy to ensure credibility and transparency in our communications. The second pillar, *Lead Low Carbon Transformation*, maintains our commitment to reducing emissions by 42% by 2030, in line with SBTi targets, and to designing net-zero buildings from 2028 onwards, which is central to our environmental impact reduction strategy. The third pillar, *Grow As Individuals And Communities*, focuses on supporting employee development, well-being, and ensuring a safe workplace, as well as supporting local communities in collaboration with local authorities at every stage of project delivery. The final pillar, *Be A Reliable Business Partner*, underpins our goal to foster an ethical culture among our employees and business partners

alike. This pillar underscores our commitment to raising awareness of ESG among 7R Group employees, enabling us as an organisation to achieve our climate and social well-being targets in the future.

What distinguishes 7R's approach to sustainability is our long-term vision. We have decided that selected premium properties will remain part of our portfolio indefinitely, reflecting our deep commitment to sustainable development. This approach underscores that we approach each investment with the long-term perspective of a multiyear owner, integrating low-carbon and sustainable solutions from the planning stage onward.

As part of our activities, we have established the „Green Team” – a multidisciplinary team of experts responsible for creating energy-efficient warehouses and providing sustainability expertise across the organisation. This team ensures that every project undertaken not only reflects our green vision but also brings tangible financial benefits for tenants and future owners. Together, we will continue on our path, expanding into new markets and strengthening relationships with our tenants while supporting sustainable development.

This report provides a summary of our actions in 2023. We have set sustainability goals and actions that we will pursue in the coming years under the ESG Strategy. We will regularly share our progress while remaining attentive to the needs and expectations of our tenants.

Yours sincerely,  
**Michał Biaś**  
Co-CEO

**Chris Zeuner**  
Co-CEO





# 7R in numbers

Data as of 31 December 2023

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**+ 16**

years in the industry

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**+ 150**

employees

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**+ 2 300 000** m<sup>2</sup> GLA

in development

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**+ 1 800 000** m<sup>2</sup>

completed

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**+ 921 000** m<sup>2</sup>

in management

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**+ €1.2** billion

sales transactions

# 01

## General *Information*



# Background

## [BP-1] GENERAL INFORMATION

The information presented in this Sustainability Report (Sustainability Statement) pertains to the parent company, 7R S.A., as well as all subsidiaries within the 7R Group from 1 January to 31 December 2023. The report has been prepared in a consolidated format, with the scope of consolidation aligned with that of the Consolidated Financial Statement of 7R S.A. for the period 1 January 2023 – 31 December 2023. The Group consists of over a hundred Special Purpose Vehicles (SPVs), created to manage specific projects. A full list of subsidiaries within the 7R Group is provided in the above-mentioned financial statement. In 2023, 7R Group operated in Poland and the Czech Republic.

The report includes information on the activities of 7R Group, as well as its broader value chain (both upstream and downstream). Information related to the value chain is detailed on the subsequent pages of this report. Where data is unavailable, an explanation is provided in the relevant sections on ESRS thematic standards, and no estimation methods were applied.

7R Group has not opted to exclude information related to intellectual property, know-how, or the outcomes of its innovations.

## [BP-2] DISCLOSURES IN RELATION TO SPECIFIC CIRCUMSTANCES

In certain cases, the information in this report references data published in the 7R Group's 2022 ESG Report to provide comparative data. Where data is unavailable, an explanation is provided. The absence of data is due to the fact that 2023 marked the first year in which 7R Group began collecting the data necessary to publish a report based on ESRS standards introduced by Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council.

This is the first sustainability report by 7R Group prepared in accordance with ESRS standards. Therefore, no deviations, changes in the preparation or presentation of sustainability information, or reporting errors from previous periods are described.

We have adopted the following timeframes for assessing impacts, risks, and opportunities: short-term – aligned with the financial reporting period, medium-term – from the end of the short-term reporting period up to five years, and long-term – beyond five years. For climate-



-related risks and opportunities, the timeframes are extended beyond five years: short-term – until 2040, medium-term – until 2060, and long-term – until 2100, in accordance with the guidelines of the Intergovernmental Panel on Climate Change (IPCC<sup>1</sup>).



## Corporate governance

### [GOV-1] MANAGEMENT BOARD

Michał Białas and Christopher Zeuner have been appointed as Co-Chief Executive Officers of 7R S.A. as of June 19, 2024, succeeding Tomasz Lubowiecki, the founder and former CEO of 7R. Tomasz Lubowiecki, who previously led as CEO, has transitioned to a role on the Supervisory Board. Michał Białas, prior to his current role, held the position of Chief Business Development Officer, while Chris Zeuner served as Chief Investment Officer.

The Management Board includes four members, each holding an executive role with responsibilities encompassing the management, oversight, representation, and operational leadership of the 7R Group. The Board members bring diverse experience across specific sectors, products, and geographic regions, which is detailed in the table below.

1 IPCC\_Report



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As of the date of publication of this report, the composition of the Management Board of the parent company, 7R S.A., was as follows:



**MICHAŁ BIAŁAS**

*co-CEO*

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Michał has extensive experience in the real estate sector, specialising in structuring, financing, and executing transactions. At 7R, as Chief Business Development Officer, he was responsible for expanding the property and tenant portfolio and implementing the company's growth strategy in key markets. Before joining 7R, he was with the Accolade Group, where he contributed to a tenfold increase in the portfolio, reaching over 1.3 million m<sup>2</sup> of warehouse space. He also served on the board of the Accolade SICAV fund and previously worked at Santander Bank Polska (formerly BZ WBK), where he held the position of Director of Corporate Clients.



**CHRISTOPHER ZEUNER**

*co-CEO*

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Christopher has served as Chief Investment Officer and a member of the 7R management board since January 2021, bringing 24 years of real estate industry experience. His career includes extensive corporate restructuring and transaction management across Europe. Before joining 7R, Christopher led Amstar's European operations, managing a portfolio exceeding €400 million for a large SFO-backed private equity group. Previously, he worked for several leading private equity real estate investors, including LaSalle Investment Management, JER Partners, and GE Real Estate, with a transaction portfolio worth over €2.6 billion.

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As of the date of publication of this report, the composition of the Management Board of the parent company, 7R S.A., was as follows:



**TOMASZ MIKA**

*CFO*

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Tomasz has extensive experience in financial management and optimisation of key financial and operational processes in Poland, Germany, and Russia. Tomasz has worked for brands such as Cersanit, Hollywood, IKEA, Pfeiderer, PwC, and KPMG, where he developed expertise in financial forecasting, budgeting, financial analysis, cash flow management, and risk management.



**SØREN RODIAN OLSEN**

*Member of the Board*

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Søren has 21 years of experience in management within the Polish real estate sector. Currently, he leads NREP's Polish logistics branch, Logicenters, and established NREP's Warsaw office in 2021. Before joining NREP, Søren was a Partner and Head of the Capital Markets Department at Cushman & Wakefield. Previously, he led Aberdeen Asset Management in Poland and, from 2002 to 2008, worked at Bank BPH (Bank Austria Creditanstalt) and mBank (Commerzbank) as Head of Asset Management, Real Estate, Supply Chain, and Business Continuity.

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From 1 January to 31 December 2023, the 7R S.A. Management Board was composed entirely of men. The Management Board of 7R S.A. does not include representatives or other individuals providing services.

## SUPERVISORY BOARD

The Supervisory Board consists of five dependent members whose roles and responsibilities include overseeing and managing the operations of the 7R Group, representing it, and overseeing the management of its assets. The Supervisory Board operates in a non-executive capacity. The professional

backgrounds of Supervisory Board members are detailed below, including sector, product, and geographical expertise.

From 1 January to 31 December 2023, the Supervisory Board was composed entirely of men.

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## As of the date of publication of this report, the composition of the Supervisory Board of 7R S.A. is as follows:

### **TOMASZ LUBOWIECKI**

*Member of the Supervisory Board*

Tomasz has over 20 years of experience in the real estate sector, and in 2008, he founded 7R. Under his leadership, the company has grown into one of the fastest-expanding players in the Polish real estate market. One of Tomasz's key priorities is sustainability and development of premium warehouse facilities.

### **PETRI VALKAMA**

*Member of the Supervisory Board*

Petri heads Nrep's residential investments and has worked on logistics and residential evaluations and acquisitions. He now leads the Serviced Living strategy for Noli Studios, developing it from concept to initial transactions. Previously, he was with McKinsey & Company, where he managed transformation projects for Scandinavian firms with global reach.

### **RYSZARD GRETKOWSKI**

*Member of the Supervisory Board*

Since 2008, he has been active in the commercial real estate industry as a co-founder and former Deputy CEO of 7R. Ryszard Gretkowski specializes in customer focus, branding, and fostering long-term B2B relationships.

### **ALFRED EKLÖF**

*Member of the Supervisory Board*

As a partner and managing director of the Nrep Income+ fund, he has led the Nordic Strategy & Transactions team for Logicens since 2014, strengthening Nrep's position as a top developer of logistics facilities in the Nordics. He co-developed investment guidelines for core/core+ sectors. Previously, he was a project manager at McKinsey & Company in Stockholm, advising clients in private equity, automotive, and technology.

### **MATTHIAS KETTELHOIT**

*Member of the Supervisory Board*

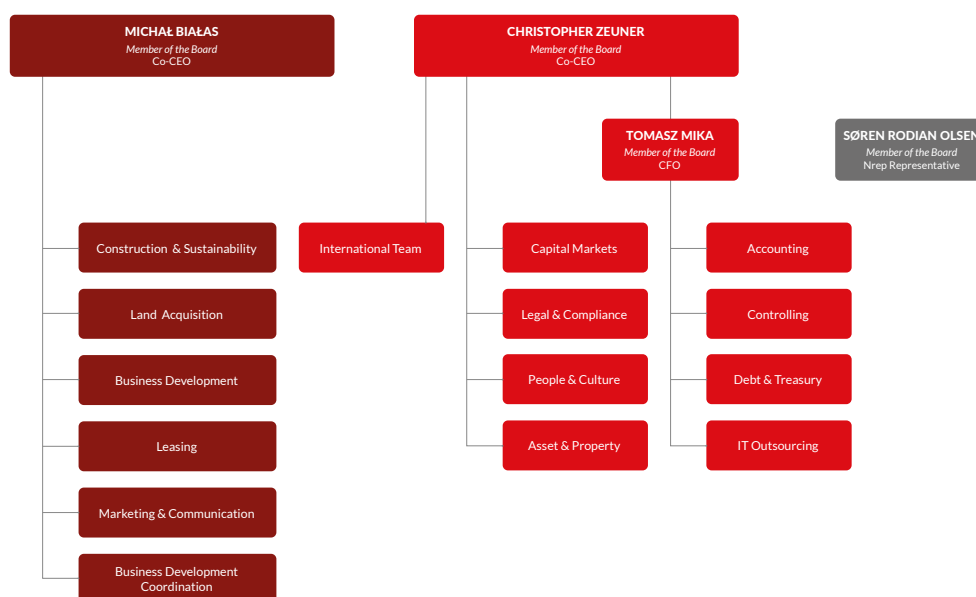
An experienced non-executive board member in logistics and supply chain, Matthias Kettelhoit brings expertise in negotiation, business planning, operations management, and international business. He is skilled in business development and completed specialized training at Chalmers University, CHAMPS.

The Management Board and Supervisory Board members possess extensive knowledge in sustainability-related areas, including strategy, client management, development, finance, risk management, real estate management, and supply chain oversight, thanks to their experience and active involvement in managing these matters within their respective organisations. Board members participate in regular internal meetings where key sustainability initiatives and 7R's activities in this area are discussed. Each member of the Management and Supervisory Boards has access to consultation with internal experts as well as external advisors regarding sustainability management and compliance.

# Sustainability management

[GOV-1] [GOV-2] Sustainability matters within the 7R Group are managed at the levels of the Management Board, Supervisory Board, and Senior Management. The Investment Committee, established in 2023, along with the Construction & Sustainability Department, is responsible for overseeing key sustainability issues.

## ORGANIZATIONAL STRUCTURE OF THE 7R GROUP



*The Investment Committee's role is to manage risks and oversee sustainability matters, including climate and biodiversity issues, across all investments. This committee plays a crucial role in ensuring that sustainability risks are carefully considered and managed within the Group's project portfolio.*

## MANAGEMENT BOARD OF 7R S.A.

### Strategic management and oversight of the Sustainable Development Goals

The Management Board of 7R S.A. is responsible for strategic decision-making in sustainable development and overseeing the set objectives outlined in the ESG Strategy. In 2023, the Board approved the decarbonization plan aimed at reducing Scope 1 and Scope 2 emissions by 2030, with goals aligned with the Science Based Targets Initiative (SBTi). The Board's responsibilities also extend to overseeing risk management in the 7R Group, as per the internal risk management protocol.

## SUPERVISORY BOARD

### Oversight of strategic sustainability plans

The Supervisory Board monitors and reviews the strategic sustainability plans. Regularly, members of the Supervisory Board review the progress and performance of the ESG Strategy objectives as well as the overarching business model's sustainability initiatives.

## INVESTMENT COMMITTEE

### Sustainability governance for planned investments

Formed in 2023, the Investment Committee includes members appointed by Tomasz Lubowiecki (the 7R founder and Supervisory Board member) and the partner NREP (Nordic Real Estate Partners). This committee is charged with overseeing investment decisions and sustainability matters at the investment level, including the approval process based on Sustainability Due Diligence (SDD), which was also introduced in 2023 as a part of the risk management framework.

## SENIOR MANAGEMENT

### Sustainability management

Senior Directors in various departments are responsible for day-to-day management and monitoring of sustainability-related issues. In 2023, designated Directors contributed to the dual materiality assessment and the development of strategic ESG objectives. Reporting on sustainability matters by Directors to the Management and Supervisory Boards takes place during regular internal meetings and through monthly reporting.

## CONSTRUCTION & SUSTAINABILITY

### Sustainability management and ESG strategy development

The Construction & Sustainability Department, led by Piotr Miodek, Head of Construction & Sustainability, is directly responsible for the development and execution of the ESG strategy. With over 12 years of experience in the logistics sector, Piotr Miodek supports tenants in implementing eco-efficient solutions that enhance operational and cost efficiency of buildings. The Sustainability Coordinator within the department handles ongoing sustainability projects, supports ESG reporting, and contributes to strategic ESG planning.



## SCOPE OF RESPONSIBILITIES OF CONSTRUCTION & SUSTAINABILITY DEPARTMENT



Implementing ecological warehouse solutions



Communication to key external stakeholders (investors, tenants, general contractors, and other business partners)



Monitoring key performance indicators (KPIs)



Collecting and consolidating ESG data



Internal reporting to the Management Board on the achievement of strategic goals and external reporting (sustainability reporting)



Educating and raising employee awareness regarding sustainability



Oversight of ESG Strategy implementation

Reporting to the Management Board and the Supervisory Board occurs regarding the extent of fulfilment of strategic objectives and for each project under construction. The following matters are reported during construction: levels of primary and final energy according to the designed energy characteristics and carbon dioxide equivalent in the life cycle assessment (LCA) (conducted three times throughout the project), the capacity of photovoltaic panels in the project, and information on the standard and method of heating the building.



## Green Team

Experts, including property managers, engineers, project managers, business development managers and architects, have been organised into working groups that analyse and define new directions for development. These include areas such as BREEAM, the European Green Deal, EU Taxonomy, the utilisation of modern technologies, and the specification of a zero-emission warehouse that considers both embedded and operational carbon footprints. The "Green Team" is led by Piotr Miodek, Head of Construction & Sustainability at 7R.



The scope of the Green Team's tasks encompasses analysing and implementation of new technologies and solutions, seeking innovations, and supporting the achievement of greenhouse gas emission reduction targets. The team is responsible for creating energy-efficient warehouse solutions that will offer tangible savings to tenants and future owners.

**[GOV-3] INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES**

The current Remuneration Policy of the Executive Board and the Non-Executive Board does not include an incentive scheme for sustainability achievements.

**[GOV-4] STATEMENT ON DUE DILIGENCE**

The due diligence process in the 7R Group includes the guidelines of the 7R Group Code of Best Practice, consisting of the Code of Ethical Conduct (i.e. tax obligations, fair competition, employee rights), the Anti-Corruption Policy, the Hospitality Policy, the Engagement Rules for Employees and Suppliers consulting central and local government authorities, the Engagement Rules for Employees and Suppliers interacting with Business Partners and Suppliers, the 7R Group Charitable Giving and Sponsorship Policy and the Whistleblower policy.

Main elements of the due diligence process	Reference Pages
a. Embedding due diligence in governance, strategy and business model	8, 30, 69, 85
b. Engaging with affected stakeholders in all key steps of the due diligence	20, 24, 30
c. Identifying and assessing adverse impacts	30
d. Taking actions to address those adverse impacts	20, 35-62, 64-79, 85
e. Tracking the effectiveness of these efforts and communicating	20, 35-62, 64-79, 85

**[GOV-5] RISK MANAGEMENT AND INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING**

7R Group has collected ESG data in accordance with the CSRD and ESRS for the first time and the outcomes have been presented in this report. Lack of data has been identified as one of the key risks which impacts the quality of internal reporting – this risk also applies to the value chain data, at both upstream and downstream level. The current risk management and internal control system does not cover sustainability reporting risks. As part of our ESG strategy, we plan to implement a sustainability reporting procedure by 2026.

The Sustainability team is responsible for overseeing the preparation of the sustainability report. The content of this report has been approved by the Management Board of the 7R Group.

# Business model

[SBM-1] [SBM-2] [SBM-3]

The 7R Group operates within the commercial real estate market and specializes in providing modern and energy-efficient logistics and manufacturing buildings for rent or sale. Our activity includes comprehensive management of the investment process, starting from the location assessment delivered by technical and legal teams, through the process of obtaining the necessary planning decisions, to the commissioning of the completed facility, then management and potential resale. To date, the 7R Group has completed investments only in the Polish market.

Our competitive advantage is strengthened, amongst other things, by the planned collection of reserved plots of land – the so-called „land bank”. We continue to search for attractive locations with good growth prospects for potential lessees and we prepare development areas for future investment. We design modern buildings in tandem with future lease holders, tailored to their specific needs.

*Before commencing the investment and acquisition of a given plot, we carefully analyze site constraints including the ESG aspects, i.e. the environmental impact assessment, biodiversity and the opportunities for minimizing the negative impact on the natural environment. This approach is aligned with our customers' expectations and corresponds with the fast-changing real estate market, including compliance with the legislative requirements of the European Union.*

The 7R product portfolio includes warehouse facilities, primarily intended for logistics companies, as well as manufacturing enterprises, including those from the automotive, electronics, and pharmaceutical sectors.

The total revenue of the 7R Group obtained from January 1 to December 31, 2023, in the Polish and Czech markets amounted to 316,526,673.70 PLN<sup>1</sup>.

In 2023, we employed 159 staff members, including 155 employees in Poland, 3 in the Czech Republic, and 1 in the Netherlands.



1 The information on total revenue is based on the Consolidated Financial Statement of 7R Group for the period from 1 January 2023 to 31 December 2023. Revenue sources include: leasing and brokerage in leasing warehouse and office spaces, property management services, general contracting agreements, logistics services, storage and warehousing, and other services (related to 7R Solution activities), as well as administrative, financial, and accounting services.



## 7R Group Portfolio



- 7R Park
- 7R City Park
- 7R City Flex
- 7R BTS
- 7R Green Saver

*In 2023, the 7R Group established a strategic partnership with the Nrep fund (through Nordic Strategies Fund V), which became the majority shareholder of the company. Nrep invested approximately 200 million euros of new capital into the company, making it one of the best-capitalized developers of logistics and industrial real estate in Poland. Together with Nrep, 7R aims to minimize the carbon footprint and build zero-emission warehouses.*

## PORTFOLIO'S KEY PRODUCT GROUPS

Our client base form companies of various sizes and spread across different industries, i.e. logistics, light manufacturing, e-commerce, pharmacy and automotive. At 7R, we offer big box facilities (logistics parks) as well as tailor-made BTS warehouses and urban warehouses from our City Flex Last Mile Logistics line.



7R Parks are modern and eco-friendly warehousing and production parks located in attractive locations—close to motorways, transport hubs, and airports, with facilities situated near all major metropolitan areas in Poland. Within our parks, we offer rentals of warehouse spaces tailored to the specifics of businesses from various sectors, such as logistics, trade, e-commerce, pharmaceuticals, and automotive



7R City Flex are urban logistics facilities defined by their strategic locations to guarantee convenient access to city centers and well connected with main transport hubs.



7R City Park is a special offering that combines the best features of warehouses and 7R City Flex Last Mile Logistics. Our suburban City Parks are located in urban agglomerations, with good access to public transport. They also offer the space required for a variety of services i.e logistics, packaging, warehousing and production to suit customer operational needs.



Build-to-Suit (BTS) facilities provide a bespoke solution for customers to meet their needs. They include facilities built in unusual locations or built to match the needs of investors. The BTS facilities can be adapted to different types of operations. We can offer standard and automatic warehouses, refrigerated warehouses and warehouses prepared for light production to name a few.



Green Saver is the first warehouse that meets low carbon criteria. The building must achieve at least a 50% reduction in operational carbon dioxide emissions and a 50% reduction in primary energy demand compared to buildings compliant with Building Regulations in Poland. The very energy-efficient buildings can generate revenue savings. Additionally, the buildings must achieve BREEAM certified rating of Outstanding.

## Office and warehouse locations under operational control of the 7R Group in 2023



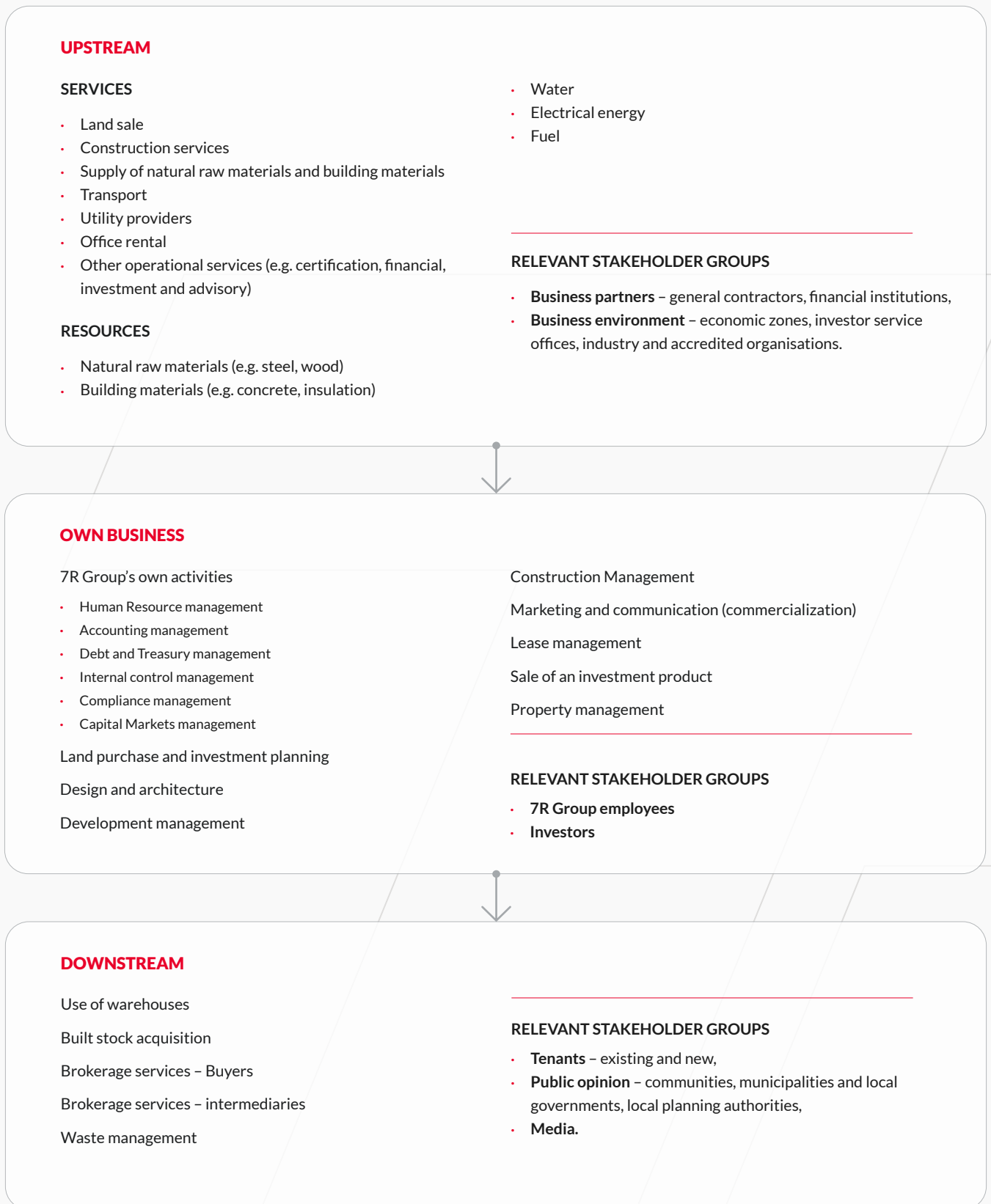
- 7R Park
- 7R City Park
- 7R City Flex
- 7R BTS
- Biura 7R
- 7R City Park Gdańsk Airport I – Sąsiedzka,
- 7R Park Bydgoszcz II Zachem,
- 7R City Flex Kraków Airport I,
- 7R City Flex Katowice,
- 7R Park Kielce,
- 7R City Park Gdańsk South II – Lublewo,
- BTS Bielsko-Biała West,
- 7R Park Wrocław West II,
- 7R Park Tczew III,
- 7R Park Gdańsk III (Barniewice),
- 7R BTS Czechowice South IV



# Value chain

The value chain of the 7R Group includes the entire operations from the beginning of the project development to the final sale. The process between involves a wide range of stakeholders working upstream and downstream. The upstream chain covers the supply of raw materials and construction items and includes the contractor construction activities. The downstream level of the value chain includes the lifespan of warehouse operations.

As per the Consolidated Financial Statements of the 7R S.A. Group submitted in the end of year 2023, the 7R Group lost independent control over 7R Solution, a limited company providing road transport services using heavy goods vehicles, no longer consolidates it by the full method.



Key stakeholder groups	Objectives	Engagement	Outcomes
<b>7R Group employees</b>	<p>Ensuring a transparent, ethical and inclusive culture within the organization.</p> <p>Providing qualified and committed staff.</p> <p>Researching the needs and expectations of employees.</p> <p>Ensuring the safety of employees in the workplace.</p> <p>Compliance with applicable regulatory requirements.</p>	<p>Direct and ongoing communication and exchange of information.</p> <p>Communication channels – newsletters, emails.</p> <p>Whistleblower channel</p> <p>Regular and ad-hoc corporate events</p> <p>In-house training.</p> <p>Submitting ideas for improvements related to the organization and our offerings</p>	<p>Impact on the policies, objectives, and actions of the 7R Group in the employee area.</p> <p>Impact on implemented and planned employee initiatives.</p> <p>Impact on the adjustment of the training offerings.</p> <p>Impact on the products and services offered, thanks to a qualified workforce.</p>
<b>Investors</b>	<p>Ensuring stable, long-term growth of the organization by meeting investors’ requirements.</p> <p>Ensuring the achievement of key non-financial indicators regarding the company’s sustainability, which becomes the most crucial factor in determining the realization of investments.</p> <p>Ensuring compliance with corporate governance and transparency.</p>	<p>Direct communication with investors.</p> <p>Reporting of non-financial indicators.</p> <p>Regular meetings with members of the Management Board.</p> <p>Publication of financial results.</p> <p>Publication of the sustainability report.</p>	<p>Impact on the policies, objectives and activities of the 7R Group, especially in the area of corporate governance.</p> <p>Impact on the organization’s long-term growth and development plans.</p> <p>Impact on the development of the Group’s product portfolio and operations.</p>
<b>Tenants – current and potential</b>	<p>Providing clients with warehouse space that meets their needs and expectations.</p> <p>Investigating the changing needs and expectations of tenants.</p>	<p>Direct communication with client representatives.</p> <p>Face-to-face meetings during the tender stage</p> <p>Industry events.</p> <p>7R Group website.</p>	<p>Impact on business model and ESG strategy goals.</p> <p>Product portfolio development and delivery of technical solutions that meets customer expectations</p>

<p><b>Business partners – general contractors,</b> <b>Financial institutions,</b> <b>Business environment – economic zones,</b> <b>Investor service offices,</b> <b>Industry and accredited organisations.</b></p>	<p>Delivering products and services through transparent collaboration with business partners who operate in accordance with the ethical principles of the 7R Group.</p> <p>Ensuring due diligence in the value chain of the 7R Group and strengthening investor trust.</p> <p>Enhancing professionalism in the real estate industry and promoting sustainable construction.</p> <p>Achieving BREEAM certification for buildings.</p>	<p>Ongoing communication regarding procurement procedures.</p> <p>Ongoing communication regarding ongoing projects and investments.</p> <p>Publication of financial results.</p> <p>Publication of the sustainability report.</p> <p>Industry events.</p> <p>7R Group website.</p>	<p>Impact on the delivery of products and services.</p> <p>Indirect impact on achieving the goals of the ESG strategy.</p> <p>Impact on the development of the product portfolio and the implementation of technological construction solutions.</p>
<p><b>Public opinion – local communities,</b> <b>Municipalities and local governments,</b> <b>Local Planning authorities</b></p>	<p>Identification of the needs and expectations of local communities and addressing their concerns as part of the implemented investments.</p> <p>Mitigating and reducing the negative impact of implemented investments on local communities.</p>	<p>Direct consultations during the planning stage and post implementation</p> <p>Local media.</p> <p>7R Group website.</p>	<p>Impact on planned and completed investments.</p> <p>Impact on planned and completed initiatives for local communities.</p> <p>Impact on the policies, objectives and activities of the 7R Group in the social area.</p>
<p><b>Media</b></p>	<p>Collaboration with industry media allows for the communication of important business and product information to current and potential tenants, as well as other interested parties.</p> <p>Ensuring transparent and credible external communication.</p>	<p>Communication regarding business and product information.</p> <p>Social media channels.</p> <p>7R Group website.</p> <p>Industry events.</p>	<p>Impact on the management of external communication.</p> <p>Impact on the Anti-Greenwashing Policy.</p> <p>Impact on the perception of the company by stakeholders.</p>

# ESG Strategy

[SBM-1] In September 2024, prior to the publication of this report, the Management Board of the 7R Group adopted a revised ESG Strategy, setting the direction for actions in the coming years and defining specific, measurable goals that will allow us to monitor progress. The ESG Strategy is based on four fundamental pillars:

## 1 PILLAR

### ADD VALUE FOR OUR CLIENTS

*creating added value, i.e. unique solutions for our clients*

## 2 PILLAR

### LEAD LOW CARBON TRANSFORMATION

*being a leader in the field of low-carbon transformation*

## 3 PILLAR

### GROW AS INDIVIDUALS AND COMMUNITIES

*supporting the development of employees and local communities*

## 4 PILLAR

### BE RELIABLE BUSINESS PARTNER

*to be a trustworthy business partner*

To ensure compliance with current and upcoming regulations and to address the needs and expectations of our significant stakeholder groups, we have revised the 7R Group's ESG Strategy with a perspective towards 2030. A key process in updating the Strategy was conducting a double materiality analysis in accordance with the requirements of the CSRD and ESRS. A crucial element of this process was the identification and assessment of significant impacts, risks, and opportunities of our operations, taking into account both the upstream and downstream value chains. We also engaged selected stakeholders—employees, tenants, and general contractors—to evaluate the materiality of sustainability topics. This process allowed us to identify relevant issues in the environmental, social, and governance areas, for which measurable strategic objectives were subsequently established.

In developing the strategic goals, we engaged representatives from key departments of the 7R Group, which facilitated detailed discussions on significant topics and challenges facing the organization, as well as the establishment of priorities to ensure the long-term and sustainable development of the Group.





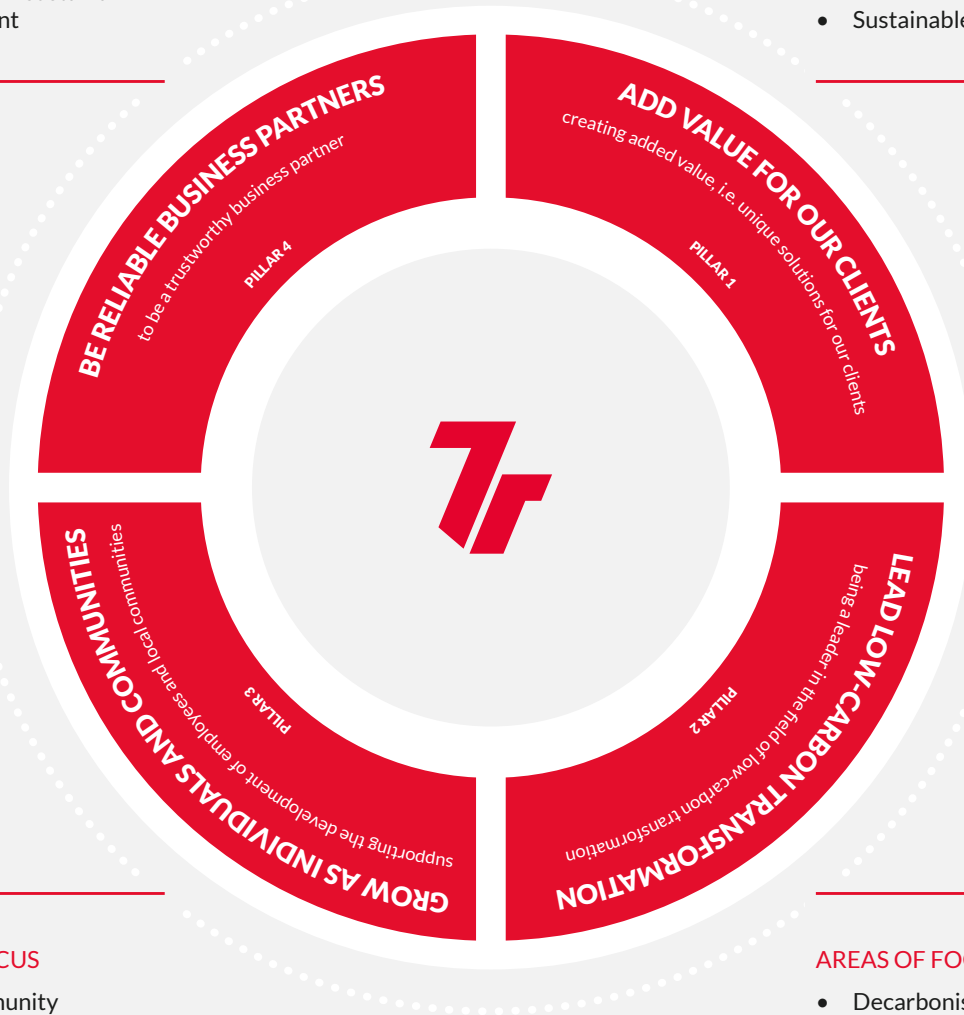
# ESG Strategy

## AREAS OF FOCUS

- Corporate governance
- Business partners
- Promotion of sustainable development

## AREAS OF FOCUS

- Tenant satisfaction
- Education and communication with tenants
- Sustainable buildings



## AREAS OF FOCUS

- Local community
- Responsible employer
- Employee satisfaction
- Health & safety and well-being of employees

## AREAS OF FOCUS

- Decarbonisation and resilience
- Environmental policy
- Sustainable investments

## Objectives of the ESG Strategy

### PILLAR 1

#### ADD VALUE FOR OUR CLIENTS



Target	Baseline year	Target year
<b>Area 1</b>		
<b>TENANT SATISFACTION</b>		
We will implement tools to measure tenant satisfaction.	2024	2025
Starting from 2026, we will conduct an annual tenant satisfaction survey across the entire portfolio.	2026	Ongoing
<b>Area 2</b>		
<b>EDUCATION AND COMMUNICATION WITH TENANTS</b>		
We will increase our efforts to raise awareness of sustainable buildings among our tenants. We will organize educational campaigns addressed to tenants, focusing on sustainable development, including waste management, energy efficiency and water conservation	2025	Ongoing
We will increase the share of gross leasable area (GLA) covered by green leases in our building portfolio.	2025	Ongoing
We will implement an Anti-Greenwashing Policy to ensure transparent and honest communication	2024	2025
<b>Area 3</b>		
<b>SUSTAINABLE BUILDINGS</b>		
We will prepare a dedicated sustainable development strategy to match building technical specifications with customer needs and to maximize the potential of the location. The strategy will address the following issues:	2024	Ongoing
We will offer solutions to enhance tenants' comfort and well-being based on the tenant's needs evaluation in 100% of our assets.	2023	Ongoing
We will incorporate solutions that reduce water consumption in 100% of our assets.	2022	Ongoing
We will strive to increase the power of installed PV capacity for our new developments.	2022	Ongoing
We will aim to purchase Guarantees of Origin certificates for 100% of our electricity demand across warehouses owned and managed by 7R.	2024	Ongoing
For all our new development we will prepare a biodiversity development plan.	Q4 2023	Ongoing
All buildings will be designed in accordance with BREEAM Excellent certification.	Q3 2023	Ongoing

<p>We will strive to ensure that buildings meet our Green Saver criteria:</p> <ul style="list-style-type: none"> <li>• primary energy (EP) reduced by at least 50%, benchmarked against Polish Building Standards,</li> <li>• operational greenhouse gas emissions reduced by at least 50%, benchmarked against Polish Building Standards,</li> <li>• BREEAM certified at the Outstanding level</li> </ul>	2023	Ongoing
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## PILLAR 2

### LEAD LOW CARBON TRANSFORMATION



Target	Baseline year	Target year
<b>Area 1</b> <b>DECARBONISATION AND RESILIENCE</b>		
By 2030, we will reduce Scope 1 and 2 emissions by 42% compared to the baseline (2022), in line with our SBTi commitment. We will focus on reducing office energy consumption and fleet's fuel usage.	2022	2030
We will calculate our Scope 3 emissions to set a science-based target for Scope 3 emissions reduction by 2030.	2025	2030
By 2028 we will develop a zero-carbon building standard that can be delivered at affordable price.	2023	2028
We will assess the climate change resilience of our business model.	2025	2026
We will commence works on a transition plan by 2026.	2026	2028
<b>Area 2</b> <b>ENVIRONMENTAL POLICY</b>		
We will implement environmental policy including issues of climate change, water conservation, biodiversity, and circular economy.	2024	2025
We will implement environmental and Health and Safety guidelines for our general contractors.	2024	2025
<b>Area 3</b> <b>SUSTAINABLE INVESTMENTS</b>		
By 2026, we will develop a sustainable investment policy, expressing our intent to meet the criteria of the EU Taxonomy for our assets.	2025	2026

**PILLAR 3**  
GROW AS INDIVIDUALS AND COMMUNITIES



Target	Baseline year	Target year
<b>Area 1 LOCAL COMMUNITY</b>		
We will develop a community engagement policy to set guidelines for our involvement with local communities.	2024	2025
We will support at least one community initiative each year, to support sport and healthy lifestyle, culture, education or charitable organization.	2024	Ongoing
<b>Area 2 RESPONSIBLE EMPLOYER</b>		
We will revise internal policies and regulations to include:	2023	-
Equal access to training for all employees	2023	-
Annual salary reviews	2022	-
Equal pay for equal work, regardless of gender	2024	2024
Annual performance reviews and goal setting involvement all employees	2024	2024
<b>Area 3 EMPLOYEE SATISFACTION</b>		
At least 75% of employees will participate in eNPS surveys.	2024	Ongoing
<b>Area 4 HEALTH &amp; SAFETY AND WELL-BEING OF EMPLOYEES</b>		
We will encourage employees to take leave, aiming to set the carry over leave days to 10 days per employee (20 days in 2025, 15 days in 2026, 10 days in 2027).	2025	2027
We will implement at least 12 initiatives supporting employee well-being each year.	2023	Ongoing
All offices will be externally verified against health and safety standards.	2022	Ongoing

**PILLAR 4**  
BE RELIABLE BUSINESS PARTNER



Target	Baseline year	Target year
<b>Area 1</b>		
<b>CORPORATE GOVERNANCE</b>		
We will implement Human Rights policy by 2025.	2024	2025
We will implement a Sustainable Development Policy containing an ESG reporting procedure.	2025	2026
We will introduce a Grievance Policy to ensure that all employees, including ones in the value chain, can raise complaints through a dedicated mechanism.	2024	2024
We will strive to ensure gender equality in the management	2025	2026
<b>Area 2</b>		
<b>BUSINESS PARTNERS</b>		
We will update the Code of Good Practice for contractors and aspire that all main contractors sign the updated version by 2026.	2024	2026
We will implement an environmental and social assessment system for contractors.	2024	2025
<b>Area 3</b>		
<b>PROMOTION OF SUSTAINABLE DEVELOPMENT</b>		
We will promote sustainable business within the company by:	2025	Ongoing
<b>Onboarding:</b> All new employees were introduced to the company's sustainability commitments and Code of Practice.	2025	Ongoing
<b>Annual training:</b> All employees have completed one year of training on ESG and the Code of Good Practice.	2025	Ongoing
<b>Daily activities:</b> Promoting ESG activities among employees. Raising employee awareness of sustainability. Pro-moting actions to reduce pollution caused by employees' commuting.	2024	Ongoing
We will promote sustainable business externally by:	2025	Ongoing
Commitment to Responsible Business Principles by Joining the UN Global Compact.	2025	2025
Active participation in international and local industry associations working for sustainable development.	2025	Ongoing

# Impact, risk and opportunities

## [SBM-3] DOUBLE MATERIALITY ASSESSMENT

For the first time, we conducted a double materiality assessment of our own activities and our value chain in accordance with the requirements of CSRD and ESRS. Compared to the previous reporting year, the list of material sustainability topics has changed. In conducting the materiality analysis, we took into account the list of sustainability issues included in the thematic ESRS (as per AR 16 in ESRS 1). Based on this list, we identified and assessed the potential and actual impacts, risks, and opportunities of all sustainability issues from a short-, medium-, or long-term perspective. As part of the analysis, we also took into account business specific issues which are not included in the aforementioned list.

The double materiality assessment process engaged the management team, who identified and evaluated the impacts, risks, and opportunities related to specific sustainability issues. Key stakeholders, including 7R Group employees, along with selected general contractors and tenants, were also involved in the assessment. Feedback was collected, analysed, and subsequently used to validate pertinent aspects.

The 7R Group's operations were assessed against actual or potential, positive or negative impacts on the environment and included upstream and downstream value chain.

From the perspective of financial materiality, we identified and assessed actual and potential risks and opportunities in relation to the Group's financial position.

*As a result of the double materiality assessment, we have identified 16 material topics. The outcomes of the double materiality assessment set the foundation for sustainability reporting in accordance with CSRD and ESRS and were used to revise the ESG strategy.*



## OUTCOMES OF THE 7R GROUP'S DOUBLE MATERIALITY ASSESSMENT

ESRS	Relevant topics	Description of material impacts, risks and opportunities	Value chain
<p><b>ESRS E1</b></p> <p><b>Climate Change</b></p>	<p>Climate change mitigation</p> <p>Energy</p>	<p><b>Material impacts:</b></p> <ul style="list-style-type: none"> <li>Impact on climate change through the generation of greenhouse gas emissions from 7R Group's operational activities (e.g. new builds, use of construction materials, operation of leased assets).</li> <li>Impact on climate change through greenhouse gas emissions generated by activities across the upstream and downstream value chain (e.g., production and use of construction materials, operation of leased downstream assets, warehouse usage, and energy consumption during the construction process by general contractors).</li> <li>Impact on climate change mitigation, and consequently the quality of life and sustainable development of society, through the reduction of greenhouse gas emissions via energy efficiency measures and decarbonisation efforts, aiming for a 42% reduction in Scope 1 and 2 emissions by 2030.</li> <li>Impact on climate change mitigation, with positive implications for quality of life and sustainable development, through the reduction of greenhouse gas emissions as part of the decarbonisation strategy, focusing on reducing Scope 3 emissions.</li> </ul> <p><b>Material opportunities:</b></p> <ul style="list-style-type: none"> <li>Opportunity to decrease energy demand, reduce reliance on fossil fuels, and lower operational costs by installing renewable energy sources (e.g. photovoltaic installations on existing buildings and energy storage solutions).</li> </ul>	<p>Own business,</p> <p>Upstream,</p> <p>Downstream</p>
<p><b>ESRS E4</b></p> <p><b>Biodiversity and Ecosystems</b></p>	<p>Direct impact drivers of biodiversity loss</p> <p>Impacts on the state of species</p> <p>Impacts on the extent and condition of ecosystems</p>	<p><b>Material impacts:</b></p> <ul style="list-style-type: none"> <li>Impact on biodiversity through the implementation of investments in biologically active areas (each new development location potentially affects the local ecosystem, contributing to the reduction of green spaces).</li> <li>Impact on the restoration and strengthening of biodiversity through the implementation of biodiversity net gain</li> <li>Impact on local biodiversity and improvement of habitat living conditions by reducing grass mowing in the development areas.</li> <li>Impact on local biodiversity by introducing woodlands in wastelands and undeveloped areas.</li> <li>Impact on local ecosystems and biodiversity through investment management, including the prevention of invasive species, the use of non-invasive species, and the relocation of native species to protect the environment.</li> <li>Impact on reducing the risk of flooding through rainwater retention in the development areas.</li> </ul> <p><b>Material risks:</b></p> <ul style="list-style-type: none"> <li>Reputational risk related to the perception of 7R's activities by the public and key stakeholders as a result of land degradation caused by changes in soil structure during the implementation of the project.</li> </ul>	<p>Own business,</p> <p>Upstream</p>
<p><b>ESRS E5</b></p> <p><b>Resource Use and Circular Economy</b></p>	<p>Resources inflows, including resource use</p>	<p><b>Material impacts:</b></p> <ul style="list-style-type: none"> <li>Impact on the depletion of natural resources through the use of building materials</li> </ul>	<p>Own business,</p> <p>Upstream</p>

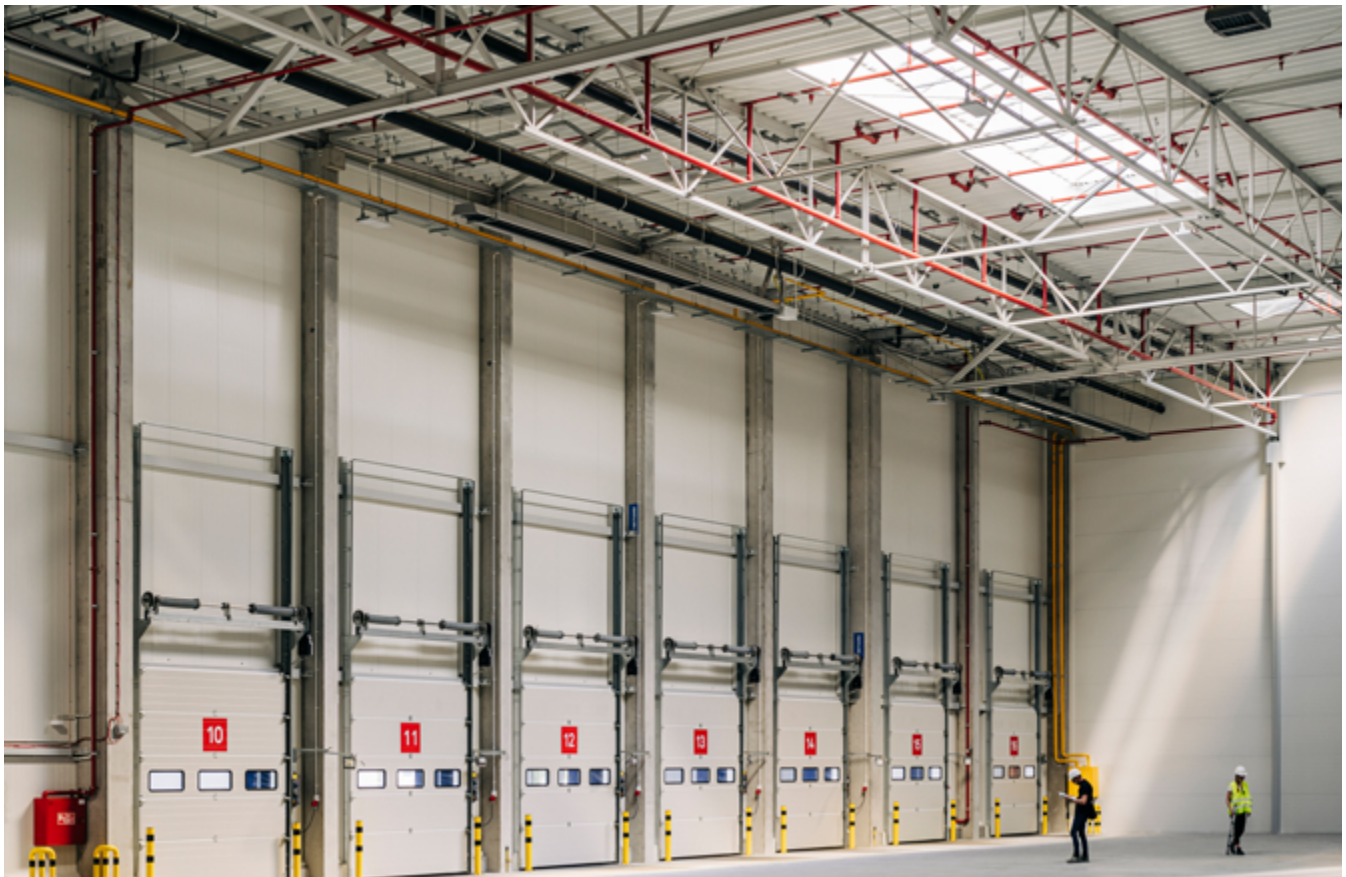
## OUTCOMES OF THE 7R GROUP'S DOUBLE MATERIALITY ASSESSMENT

<p><b>ESRS S1</b></p> <p><b>Own Employees</b></p>	<p>Working conditions</p> <p>Equal treatment and equal opportunities for all</p>	<p><b>Material impacts:</b></p> <ul style="list-style-type: none"> <li>• Impact on increasing employee satisfaction by offering secure employment guaranteed by the employment contract and offering an extended notice period – in accordance with the labour law. The company initially hires for a 3-month probationary period after which permanent contract is offered to successful candidates.</li> <li>• Impact on increasing the sense of security of employees by offering a social benefits fund to all full-time employees (excluding B2B contracts).</li> <li>• Impact on employee satisfaction through regular salary reviews and remuneration process based on employee competences, including financial and non-financial incentive system.</li> <li>• Impact on employees career and skills development by providing training tailored to the needs of individuals</li> <li>• Impact on employee satisfaction through well-being initiatives, e.g. shortening the working week (6-hour work on Fridays) or organizing health and wellbeing campaigns.</li> </ul> <p><b>Material opportunities:</b></p> <ul style="list-style-type: none"> <li>• An opportunity to increase revenues through well qualified staff by providing specialized training tailored to the individual needs of employees.</li> </ul>	<p>Own business</p>
<p><b>ESRS S2</b></p> <p><b>Workers in the Value Chain</b></p>	<p>Working conditions</p> <p>Equal treatment and equal opportunities for all</p>	<p><b>Material impacts:</b></p> <ul style="list-style-type: none"> <li>• Impact on the health and safety of employees in the value chain through contracts clauses imposing strict compliance with 7R health and safety standard and, regular audits of safety systems used on the site. 7R expects contractors to provide periodic health and safety training to their employees and requires them to submit periodic reports on the status of their health and safety procedures.</li> <li>• Impact on communication and ethical culture in the value chain by providing a Whistleblower mechanism for suppliers to report breaches and comments.</li> </ul>	<p>Upstream</p>
<p><b>ESRS S3</b></p> <p><b>Affected Communities</b></p>	<p>Economic, social and cultural rights of the community</p>	<p><b>Material impacts:</b></p> <ul style="list-style-type: none"> <li>• Impact on increasing the budget for local authorities for social initiatives, improving the quality of life for local communities by paying taxes to the municipalities where the investment takes place and supporting charitable foundations.</li> </ul>	<p>Downstream</p>
<p><b>ESRS S4</b></p> <p><b>Consumers and End-users</b></p>	<p>Related impacts for consumers and/or end-users</p> <p>Personal safety of consumers and/or end users</p>	<p><b>Material impacts:</b></p> <ul style="list-style-type: none"> <li>• Impact on environmental protection, social welfare, supporting responsible business practices and promoting a sustainable economy by conducting regular dialogue with customers, adapting the portfolio of products, technologies and building features to customer requirements related to sustainable development; regular monitoring of customer needs and expectations.</li> <li>• Impact on the informed decision-making process, increase environmental awareness and responsible management by ensuring fair marketing practices (e.g. concise messaging on green agenda, clear guidelines for storage and warehousing, customer education, ensuring an Anti-Greenwashing Policy, fair marketing practices).</li> </ul>	<p>Own business, Upstream</p>



## OUTCOMES OF THE 7R GROUP'S DOUBLE MATERIALITY ASSESSMENT

<p><b>ESRS G1</b></p> <p><b>Business Conduct</b></p>	<p>Corporate culture</p> <p>Supplier relationship management, including payment practices</p> <p>Corruption and bribery</p>	<p><b>Material impacts:</b></p> <ul style="list-style-type: none"> <li>• Impact on setting up ethical culture within the organization, which affects the sense of inclusion and satisfaction of employees with the workplace (e.g. training in the Code of Ethical Conduct for new employees, providing an anonymous channel for reporting violations).</li> <li>• Impact on sustainable development in the real estate industry through the implementation of measures to mitigate and eliminate negative impacts on the environment and people (e.g. planned implementation of an environmental and social assessment system for contractors, development of environmental, health and safety guidelines for general contractors).</li> <li>• Impact on supplier reputation and long-term business relationships by ensuring fair payment practices, especially with regard to late payments to small and medium-sized companies.</li> <li>• Impact on ethical corporate culture and raising awareness among employees through anti-corruption policy training (as part of code of conduct training), training at-risk employees, implementation of policies, procedures and actions regarding corruption and bribery.</li> </ul>	<p>Own business,</p> <p>Upstream,</p> <p>Downstream</p>
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02



# Environmental *issues*

# Climate change

As the 7R Group, we focus on increasing the energy efficiency of buildings and minimizing their carbon footprint. As part of our business, we offer options to install renewable energy generation and schemes that allow our clients to save energy and effectively monitor and control energy consumption. Low carbon measures such as heat pumps, LED lighting with automatic light intensity control or advanced BMS allow occupiers to monitor the necessary operating parameters of the building and adjust the required data points. In addition, we use increased building air tightness in our warehouses, which reduces heating demand. The users of our buildings have access to smart energy metering and building management systems that control lighting, heating and air conditioning systems.

By adopting the Greenhouse Gas Protocol, we have introduced a standard for measuring and reporting greenhouse gas emissions. Our goal is not only to provide customers with high-quality buildings, but also to ensure that they comply with net zero standards. Our investments in green technologies and renewable energy projects are the cornerstone of our long-term climate neutral strategy.

## [GOV-3] **INTEGRATION OF SUSTAINABILITY-RELATED OUTCOMES INTO INCENTIVE SCHEMES**

Currently, we do not include climate-related issues in the remuneration system for members of administrative, management and executive bodies. Therefore, the performance of these individuals is not assessed against the greenhouse gas emission reduction targets referred to in requirement E1-4.

## [E1-1] [E1-2] **POLICIES RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION**

In 2025, we plan to implement a comprehensive environmental policy that will cover climate change, water conservation, biodiversity, circular economy, environmental and health and safety guidelines for our general contractors. In response to increasing regulatory requirements and global environmental challenges, our policy will set actions to protect the environment and the sustainable use of natural resources. In addition, 7R has implemented a fleet strategy and a business travel policy supporting our efforts to reduce emissions from transport.

We currently do not have an approved transition plan for climate change mitigation, but we expect to commence its development in 2026. This plan will include a strategy and actions to limit global warming in line with the Paris Agreement and to achieve climate neutrality by 2050. So far, as part of the ESG Strategy, we have implemented activities that are in line with the future transformation plan, which in turn will further complement the activities needed to achieve the emission targets.

As part of the ESG Strategy, we plan to implement data collection processes and calculate Scope 3 emissions from 2025 and develop a technical specification for a zero-emission building. In addition, we monitor the embedded carbon footprint for new buildings and plan to purchase energy from renewable sources for the facilities we manage. The strategy also includes 7R S.A. decarbonisation plan by 2030, in scope 1 and 2, with targets approved by the *Science Based Targets Initiative (SBTi)*.

For details on the targets adopted, see section E1-4: Climate change mitigation and adaptation objectives.

## MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERDEPENDENCY WITH THE STRATEGY AND THE BUSINESS MODEL

In the area of climate change, we have identified the following important impacts and opportunities:

### IMPACTS, OPPORTUNITIES AND RISKS IN THE AREA OF CLIMATE CHANGE

- Impact on climate change through the generation of greenhouse gas emissions from 7R Group's operational activities. GHG emissions result from the use of fossil fuels in buildings (e.g. fossil fuels used for heating) and vehicles (diesel, petrol, etc.) and from the production of electricity and heat used in buildings (e.g. electricity used for hot water, lighting, electrical appliances, cooling systems, etc.) and owned and rented offices.
- Impact on climate change by generating greenhouse gas emissions as a result of downstream and upstream value chain activities (e.g. production and use of construction materials, operation of leased downstream assets, use of storage facilities, consumption of electricity during the construction process by general contractors).
- Impact on climate change mitigation, and consequently the quality of life and sustainable development of society, through the reduction of greenhouse gas emissions via energy efficiency measures and decarbonisation efforts, aiming for a 42% reduction in Scope 1 and 2 emissions by 2030.
- Impact on climate change mitigation, with positive implications for quality of life and sustainable development, through the reduction of greenhouse gas emissions as part of the decarbonisation strategy, focusing on reducing Scope 3 emissions.
- Opportunity to decrease energy demand, reduce reliance on fossil fuels, and lower operational costs by installing renewable energy sources (e.g. photovoltaic installations on existing buildings and energy storage solutions).

As part of the double materiality assessment, we have identified and assessed climate-related risks and opportunities, including physical risks and transitions in the short, medium and long term. By 2026, we have planned to carry out, for the first time, a climate change resilience assessment of our business model based on scenarios in accordance with the guidelines of the *Intergovernmental Panel on Climate Change (IPCC)*.

[E1-3]

### CLIMATE ACTION

The activities of the 7R Group in the field of mitigation and adaptation to climate change are related to ongoing and planned investments and own operations to market changes, implement decarbonization strategies, including the allocation of key resources, as well as access to financing that enables the implementation of investments and adaptation to changing demand and supply conditions.

In addition, the implementation of our activities depends on the availability of energy-efficient building technologies, which are key to reducing the operational carbon footprint of our projects. The high energy standard of buildings, which is necessary to achieve our goals, requires both advanced technologies and their availability on the market.

Ultimately, the demand for high-standard products such as BREEAM-certified buildings and their compliance with the EU Taxonomy will also play an important role in the implementation of our strategy. Maintaining or increasing the demand for green schemes will be crucial for company growth and achieving our sustainability goals.

These are key ability factors to effectively implement ESG strategies and deliver actions in response to decarbonization challenges.

We focused on reducing the energy demand in the office spaces we rent and on reducing fuel consumption in our fleet. We have installed advanced building management systems (BMS) in our offices that enable more efficient use of energy for heating and air conditioning. In addition, we have also replaced light sources with more energy-efficient ones.

As a follow-up, we have moved our Gdansk office to a modern building with higher energy efficiency standards, which has contributed to a reduction in energy consumption. When selecting the new office location, we evaluated criteria aligned with sustainable development and the availability of environmentally friendly transport options. Consequently, the chosen site is in close proximity to public transport, bicycle and e-scooters stations. It also offers safe and convenient cycling lanes to support this low-carbon mode of transport. The location is near Pomeranian Metropolitan Railway and SKM stops, providing an integrated transport model to improve urban mobility.



*We have set a target to reduce greenhouse gas emissions by 42% by 2030 compared to the baseline year 2022 in scopes 1 and 2. This target has been verified and approved by SBTi. To achieve this, we have taken a number of measures to reduce greenhouse gas emissions.*

Additionally, we ceased leasing underutilised office space in Sosnowiec, Szczecin, and Poznań, which has led to a reduction in electricity consumption. We have also implemented a business travel policy encouraging employees to use public transport and promote sustainable options, such as trains, instead of private vehicles, to further reduce emissions from business travel. Larger offices now operate a carpooling system, enabling more efficient use of company cars. These shared vehicles reduce the number of cars in the fleet and help lower carbon emissions. The Green Team has also delivered ESG training to our staff to increase their awareness of environmental issues.

***Through these actions, we demonstrate our commitment to an environmentally sustainable future by implementing ESG strategy and energy transformation plan.***

## REDUCTION OF GREENHOUSE GAS EMISSIONS (SCOPE 3)

As part of our efforts to decarbonise our value chain, we have started implementing Scope 3 data collection and emissions calculation processes, focusing on categories 11, 12 and 13. We pay particular attention to monitoring both the operational and embodied carbon footprint of our warehouses to better manage their environmental impact.

In 2023, we purchased 824,383 kWh of renewable electricity for our own buildings, which is an important step towards reducing emissions related to the use of these facilities. In addition, buildings completed in 2023 had solar PV fitted with a total capacity of 450 kWp to provide renewable self-supply.



All our buildings are BREEAM-certified, confirming their high standards of sustainable construction. We have also begun designing net-zero-ready buildings with advanced energy efficiency standards. By incorporating renewable energy sources, such as heat pumps and solar photovoltaics (PVs) with battery storage, these buildings will achieve a reduced operational carbon footprint. To put theory into practice, we have commenced construction of our first demonstrator project in Kąty Wrocławskie, designed to meet net-zero-ready standards.



## 7R Park Wrocław West II

44 000 m<sup>2</sup>

Tenant: Yusen Logistics  
Certification: BREEAM Outstanding

# CASE STUDY

## THE MOST IMPORTANT GREEN SOLUTIONS IN THE BUILDING



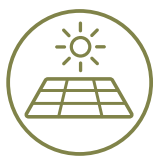
advanced BMS control system



energy-efficient LED lighting with DALI control



heating and ventilation systems with high-efficiency heat pumps and ventilation with heat recovery



photovoltaic installation



own energy storage

## EXPECTED RESULT

reduction in operational CO<sub>2</sub> emissions of more than \*

# 50%

reduced primary energy demand per annum by almost \*\*

# 70%



\* in relation to buildings constructed in accordance with technical conditions under building regulations

\*\* in relation to current regulations, per m<sup>2</sup>



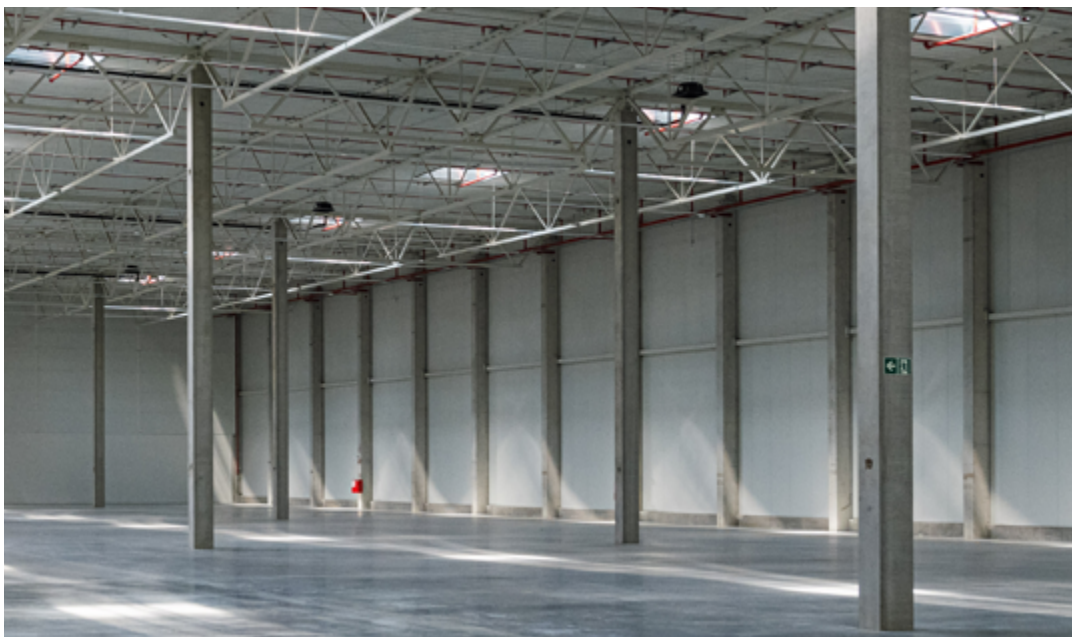
## ZERO-EMISSION BUILDING STANDARD

We have developed an zero-emission building standard that takes into account modern technologies and measures to minimize the impact on the environment. Key energy efficient measure to be implemented is the LED lighting connected to a modular lighting control to detect motion and to automate dimming.

Another key aspect is the high airtightness of the building envelope, ensuring minimal heat loss. The air permeability is approximately  $0.6 \text{ m}^3/\text{h}\cdot\text{m}^2$ , and the air exchange rate (n50) is 0.1, which significantly reduces the energy demand for heating while also confirming the high construction quality of our buildings. Heating is provided by efficient air-to-air heat pumps with a Seasonal Coefficient of Performance (SCOP) of 4.15, offering an effective and environmentally friendly heat source. The building's ventilation has been optimized by using heat recovery air handling units, which allow excess heat to be recovered from the exhaust air, thus reducing energy losses.

The building's roof is designed to accommodate photovoltaic systems, which supply green energy and support sustainable energy management within the building. The entire technical system, including mechanical and electrical installations, is monitored and controlled by an advanced Building Management System (BMS). This system optimises energy consumption based on actual demand, ensuring the highest level of energy efficiency.





#### [E1-4] TARGETS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

The targets for reducing greenhouse gas emissions have been set out in our ESG Strategy until 2030. They cover our operations and also include the value chain with the objective of reducing carbon emissions across our building stock. The baseline year has been set as 2022, as per advice from external consultants and SBTi guidelines. The targets have been approved by the Group's Board of Directors.

The ESG strategy targets have been set to support achievement of climate neutrality by 2050 in line with Paris Agreement expectations.

In terms of our own operations, our goal is to reduce absolute greenhouse gas emissions in scope 1+2 by 42% by 2030 compared to 2022 (baseline year). We aim to achieve this goal by reducing energy consumption from rented offices and by reducing fleet fuel usage of our own and leased company vehicles. By 2025, we will take action to calculate Scope 3 greenhouse gas emissions to set a Scope 3 greenhouse gas emissions reduction target in the long term. In addition, we plan to implement climate change mitigation and adaptation policies.






Our value chain goals focus on reducing greenhouse gas emissions generated from the use of our warehouses. These goals include expanding 7R's portfolio and executing new projects in line with the technical criteria of the EU Taxonomy.







From 2028, we will be ready to design all new developments as zero-emission buildings<sup>1</sup>.

<sup>1</sup> In this report, zero-emission buildings are defined as buildings that do not burn fossil fuels directly, and whose annual emissions are offset by energy production at a level equal to the total energy consumption of the building, including balancing.



## Strategic targets – Climate change

ESG Strategy Pillar	Target	KPIs	Base year	Target	SDGs	Tasks of the 2030 Agenda
<b>LEAD LOW CARBON TRANSFORMATION</b>	By 2030, we will reduce Scope 1 and 2 emissions by 42% compared to the baseline (2022), in line with our SBTi commitment. We will focus on reducing office energy consumption and fleet’s fuel usage.	% of absolute reduction in the range of 1+2	2022	2030		<b>11.6</b> By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management.
<b>LEAD LOW CARBON TRANSFORMATION</b>	We will calculate our Scope 3 emissions to set an informed Scope 3 emissions reduction target by 2030.	Calculation of Scope 3 emissions (Calculated/Not calculated)	2025	2030		<b>7.2</b> By 2030, significantly increase the share of renewable energy sources in the global energy mix.
<b>LEAD LOW CARBON TRANSFORMATION</b>	By 2028 we will develop a zero-carbon building standard that can be delivered at affordable price.	Develop a standard (Developed/Not developed)	2023	2028		<b>7.2</b> By 2030, significantly increase the share of renewable energy sources in the global energy mix.
<b>LEAD LOW CARBON TRANSFORMATION</b>	We will assess the climate change resilience of our business model.	Performing an analysis of the organization’s resilience to climate change (Completed/Not performed)	2025	2026		<b>13.1</b> Strengthen adaptation capacity and resilience to climate hazards and natural disasters in all countries.
<b>LEAD LOW CARBON TRANSFORMATION</b>	We will commence works on a transition plan by 2026.	Commence preparation of the sustainable economy transition plan (Started/Not started)	2026	2030		<b>13.1</b> Strengthen adaptation capacity and resilience to climate hazards and natural disasters in all countries.

<b>LEAD LOW CARBON TRANSFORMATION</b>	We will implement environmental policy including issues of climate change, water conservation, biodiversity, and circular economy.	Policy implementation (Implemented/Not Implemented)	2024	2025		13.3 Improving education, awareness, and human and institutional capacity for climate change mitigation, adaptation, mitigation, and early warning.
<b>LEAD LOW CARBON TRANSFORMATION</b>	By 2026, we will develop a sustainable investment policy, expressing our intent to meet the criteria of the EU Taxonomy for our assets.	implementation of a sustainable investment policy (Implemented/Not Implemented);  % of buildings compliant with the EU Taxonomy	2025	2026		13.1 Strengthen adaptation capacity and resilience to climate hazards and natural disasters in all countries.
<b>ADD VALUE FOR OUR CLIENTS</b>	We will strive to increase the power of installed PV capacity for our new developments.	Annual PV installed capacity across developments (kWp/m <sup>2</sup> )	2022	Current		7.2 By 2030, significantly increase the share of renewable energy sources in the global energy mix.
<b>ADD VALUE FOR OUR CLIENTS</b>	We will aim to purchase Guarantees of Origin certificates for 100% of our electricity demand across warehouses owned and managed by 7R.	% of electricity with Guarantees of Origin in relation to the total electricity consumption	2024	Current		7.2 By 2030, significantly increase the share of renewable energy sources in the global energy mix.
<b>ADD VALUE FOR OUR CLIENTS</b>	All buildings will be designed in accordance with BREEAM Excellent certification.	% of projects certified in BREEAM Excellent or Outstanding	Q3 2023	Current		9.4 By 2030, modernise infrastructure and modernise industry to ensure its sustainable development, increasing resource efficiency and using clean and environmentally friendly production technologies and processes, with the participation of all countries according to their capabilities.
<b>ADD VALUE FOR OUR CLIENTS</b>	We will strive to ensure that buildings meet our Green Saver criteria: <ul style="list-style-type: none"> <li>primary energy (EP) reduced by at least 50%, benchmarked against Polish Building Regulations,</li> <li>operational greenhouse gas emissions reduced by at least 50%, benchmarked against Polish Building Regulations,</li> <li>BREEAM certification at the Outstanding level.</li> </ul>	% of new Green Saver buildings	2023	Current		9.4 By 2030, modernise infrastructure and modernise industry to ensure its sustainable development, increasing resource efficiency and using clean and environmentally friendly production technologies and processes, with the participation of all countries according to their capabilities.

## PROGRESS MADE AGAINST THE PLEDGES FROM THE ESG REPORT FOR 2022

Target	From	Into	Progress in implementation
SBTi approval of the decarbonisation plan	2021	2023	<i>Completed</i>
Reduction of Scope 1 and 2 emissions by 5.25% year-on-year	2022	2023	<i>Completed</i>
Starting a Scope 3 emissions inventory	Q1 2024	<i>Not applicable</i>	<i>Completed</i>
Buildings designed in accordance with BREEAM Excellent certification	Q3 2023	<i>Not applicable</i>	<i>Completed</i>
Implementation of at least one project certified at the BREEAM Outstanding level	2023	2025	<i>Completed</i>
Implementation of the zero-emission building design standard*	2023	2028	<i>In progress</i>
Implement embedded carbon footprint monitoring across A1-A5 and throughout the life cycle	Q3 2023	2023	<i>Completed</i>
Deliver a scheme with at least 50% lower operational carbon footprint – compared to standard primary energy demand requirements.	2024	2024	<i>Completed</i>

\* Applies to the operational scope.



[ESRS E1-5] **ENERGY CONSUMPTION AND MIX**

Energy consumption from our own operations is linked to office occupancy. Electricity supply comes from the national grid and the heat is supplied from a district heating scheme – the company pays the energy bills. Part of energy mix includes fleet fossil fuel use.

[ESRS E1-5] **TOTAL ENERGY CONSUMPTION**

	Unit	2022	2023	YoY Change (%)
<b>Total Energy Consumption</b>	<b>MWh</b>	<b>1286,53</b>	<b>1096,22</b>	<b>-14,79</b>
<b>Total fossil energy consumption</b>	<b>MWh</b>	<b>1286,53</b>	<b>1096,22</b>	
Share of fossil sources in total energy consumption	%	100,00	100,00	-14,79
<b>Total nuclear energy consumption</b>	<b>MWh</b>	<b>0,00</b>	<b>0,00</b>	<b>0</b>
Share of nuclear energy in total energy consumption	%	0,00	0,00	-
<b>Total renewable energy consumption*</b>	<b>MWh</b>	<b>0,00</b>	<b>0,00</b>	<b>-</b>
Share of renewable energy in total energy consumption	%	0,00	0,00	-
Fuel consumption for renewable sources	MWh	0,00	0,00	-
Consumption of purchased or obtained electricity, heat, steam and cooling from renewable sources	MWh	0,00	0,00	-
Self-generated renewable energy consumption without the use of fuel	MWh	0,00	0,00	-
Fuel consumption from coal and coal products	MWh	0,00	0,00	-
Fuel consumption from crude oil and petroleum products	MWh	881,56	763,37	-13,41
Natural gas fuel consumption	MWh	0,00	0,00	-
<b>Fuel consumption from other fossil sources</b>	<b>MWh</b>	<b>0,00</b>	<b>0,00</b>	<b>-</b>
Consumption of purchased or obtained electricity, heat, steam or cooling from fossil sources	MWh	404,97	332,85	-17,81
Self-generated non-renewable energy production	MWh	0,00	0,00	-
Self-generated renewable energy production	MWh	0,00	0,00	-

\* A precautionary approach (in line with ESRS E1 AR32 j) has been taken in the allocation of electricity, where data for this item do not include energy supplied without appropriate instruments, such as renewable power purchase agreements, standard tariffs for green energy, or market-based instruments such as guarantees of origin from renewable sources.

	Unit	2022	2023	YoY Change (%)
<b>Energy intensity based on net revenues</b>				
Total energy consumption from activities in high climate impact sectors*	MWh	1286,53	1096,22	-
Net revenues from activities in high climate impact sectors***	PLN	255 935 900,28	316 526 673,70	-
Energy intensity per net revenue***	MWh/1 mln EUR	5,03	3,46	-31,00

\* Only energy consumption from processes run or managed by the entity, using the same boundary used to report scope 1 and 2 greenhouse gas emissions.

\*\*\* The company's total net revenues were taken into account for the calculation of the ratio, as 7R's core business is unified and within a sector with a significant impact on the climate.

## GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS

Greenhouse gas emissions monitoring has commenced since 2022, using the guidelines and methodologies set out in *the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard Revised Edition and the GHG Protocol Scope 2 Guidance*.

When determining the scope, 7R used an operational control method (consolidation of 100% of the greenhouse gas emissions of entities over which it has operational control). Scope 1 and Scope 2 carbon footprint calculations are based on data on fuel consumption from the company's fleet and fuel bills (scope 1), as well as utility invoices (electricity and district heating) in offices in Krakow, Warsaw, Gdańsk, Wrocław, Sosnowiec, Poznań and Szczecin (scope 2). A few small leaks of refrigerants occurred in buildings, but these were not included in the greenhouse gas emissions statement given they are a third parties emissions.

Scope 2 emissions calculations were carried out using two methods: location-based and market-based. The location-based method reflects the average intensity of energy emissions coming from the grid. Emissions are calculated using the average carbon factor for Poland<sup>1</sup>. The market-based method covers emissions from the consumption of energy purchased from a selected Supplier and these emissions are based on the bespoke conversion factor. Given the lack of information from 7R suppliers, the conversion factor for Poland was used<sup>2</sup>.

The values are presented in tonnes of carbon dioxide equivalent (Mg CO<sub>2</sub>e), reflecting total greenhouse gas emissions as carbon dioxide emissions, according to Global Warming Potential (GWP).

- 1 Emission factors for electricity and heat only take into account carbon dioxide emissions due to the lack of information on emissions of other greenhouse gases in publicly available sources. Emission factors for Scope 2 electricity and heat at national level take into account transmission losses that should be included in Scope 3 Category 3.
- 2 Structure of energy sources from which electricity consumed by end users comes, after taking into account transactions from the guarantee of origin system (so-called certificates of origin for renewable energy).



In 2024, 7R began the process of data aggregation, estimation, and calculation of Scope 3 greenhouse gas emissions, covering all indirect emissions across the entire value chain. This process is still in its early stages and will continue over the coming months, with completion planned by the end of 2025.

## CALCULATION METHODOLOGY AND ASSUMPTIONS MADE IN SCOPE 1 AND 2

- The emissions were calculated by 7R using the *Climate Strategies Poland*<sup>1</sup> tool and included seven greenhouse gases (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFC, PFC, SF<sub>6</sub>, NF<sub>3</sub>).
- *The Global Warming Potential (GWP) factors used in the calculations are in accordance with The Fifth Assessment Report of the IPCC (AR5).*
- To calculate Scope 2 emissions using the location-based method, average emission intensity metric was used for both electricity and heat, as per the National Centre for Emissions Management (KOBiZE). Emissions from electricity generation were also calculated using the market-based method, using conversion factors for Poland.
- For heat, the averaged emission index for Poland was adopted<sup>2</sup>.

1 The calculation method used in the calculator is in line with the GHG Protocol methodology, and The database of emission factors is derived from internationally recognised databases and is up-to-date. The tool is compatible with *CDP, SBTi and PCAF*

2 According to the report *Thermal energy in numbers – 2022*, Energy Regulatory Office, Warsaw, October 2023, p. 96 – 0.1005 t/GJ

## GREENHOUSE GAS EMISSIONS

[E1-4] [E1-6]

Disclosure Requirement*	Unit	GREENHOUSE GAS EMISSIONS DATA					OUTLINE OF OBJECTIVES			
		Base Year****	2022	2023	YoY change (tCO <sub>2</sub> e)	YoY Change (%)	2025	2030	2050	Change from base year (%)
Gross scope 1 greenhouse gas emissions***	t CO <sub>2</sub> e	229,03	229,03	213,71	-15,32	-6,69	-	42%*	-	-8,89**
Percentage of total Scope 1 greenhouse gas emissions that are regulated under emissions trading systems	%	0,00	0,00	0,00	-	-	-	-	-	Not applicable
Gross Scope 2 GHG emissions (location-based)	t CO <sub>2</sub> e	188,02	188,02	159,68	-28,34	-15,07	-	-	-	Not applicable
Percentage of Scope 2 GHG emissions (location-based)	%	45,08	45,08	44,46	-	-1,38	-	-	-	
Greenhouse gas emission intensity indicator (Scope 2) (location based) *****	tCO <sub>2</sub> e/m <sup>2</sup>	0,065	0,065	0,059	-	-9,03	-	-	-	Not applicable
Gross Scope 2 (market-based) greenhouse gas emissions	t CO <sub>2</sub> e	210,68	210,68	186,93	-23,75	-11,27	-	42%*	-	-8,89**
Proportion of gross Scope 2 greenhouse gas emissions (market-based)	%	47,91	47,91	47,85	-	-0,13	-	-	-	Not applicable
Greenhouse gas emission intensity indicator (Scope 2) (market-based) *****	tCO <sub>2</sub> e/m <sup>2</sup>	0,073	0,073	0,069	-	-4,96	-	-	-	-
Total greenhouse gas emissions *****										
Total GHG emissions (location-based)	t CO <sub>2</sub> e	417,05	417,05	373,39	-43,66	-10,47	-	-	-	-10,47
Total GHG emissions (market-based)	t CO <sub>2</sub> e	439,71	439,71	400,64	-39,07	-8,89	-	-	-	-8,89

All greenhouse gas emissions presented in this table relate to 7R S.A., not to disaggregation in accordance with E1-6 paragraph 50b

- \* Emissions include all activities within the 7R operational control, in accordance with ESRS 1 – DR 62 and 67.
- \*\* Combined target for Scope 1 and Scope 2, based on the market-based method.
- \*\*\* Fossil fuel combustion only – car fleet
- \*\*\*\* Baseline set for 20222
- \*\*\*\*\* Applicable to 7R office space only
- \*\*\*\*\* Total for scope 1 and 2 only



## GHG INTENSITY BASED ON NET REVENUE

	Unit	2022	2023	YoY Change (%)
<b>Greenhouse gas intensity per revenue</b>				
Total GHG emissions (location-based) per net revenues (t CO <sub>2</sub> e / 1 mln PLN equivalent / monetary unit)	t CO <sub>2</sub> e / 1 mln PLN	1,63	1,18	-28,00
Total GHG emissions (market-based) to net revenues (t CO <sub>2</sub> e / 1 mln PLN equivalent / monetary unit)	t CO <sub>2</sub> e / 1 mln PLN	1,72	1,27	-26,00
Net revenues used to calculate greenhouse gas intensity	PLN	255 935 900,28	316 526 673,70	-
Net revenues (other excluding the point above)	PLN	-	-	-
Net revenue (in financial statements)	PLN	255 935 900,28	316 526 673,70	-



## Biodiversity and ecosystems

Protecting biodiversity is an integral part of our sustainability strategy. During project development our company aims to reduce the negative impact on the natural environment in line with BREEAM certification compliance. Projects are delivered as per the environmental planning conditions which ensures that our projects are implemented in a responsible manner.

Our contractors are required to adhere to our building standard that incorporates biodiversity considerations. We create green spaces around our buildings such as extensive wildflower meadows, which serve as ecological corridors, allowing the free migration and development of local species. These areas not only enhance the aesthetic appeal of our properties but also contribute to the protection and strengthening of biodiversity, which is essential for the long-term preservation of ecosystems.

## MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH THE STRATEGY AND BUSINESS MODEL

As part of a double materiality analysis, we have identified and assessed actual and potential impacts on biodiversity and ecosystems in the upstream and downstream of our value chain. The assessment also takes into account dependencies on biodiversity and ecosystems, focusing on ecosystem's functions that are important for our Company and our Value chain. We have identified the following material impacts and risks in this area:

### IMPACTS, OPPORTUNITIES AND RISKS IN THE AREA OF BIODIVERSITY

- Impact on biodiversity through the construction within biologically active areas (each new development potentially affects the local ecosystem, contributing to the reduction of the area of green spaces).
- Impact on the biodiversity net gain through the implementation of supporting measures across new developments
- Impact on local biodiversity and habitat conservation by reducing grass mowing.
- Impact on local biodiversity by planting woodlands across brownfields and undeveloped areas.
- Impact on local ecosystems and biodiversity through investment management, including invasive species prevention, the use of non-invasive species, and the relocation of native species to protect the environment.
- Impact on reducing the risk of flooding through rainwater retention in the investment areas.
- Reputational risk related to the perception of 7R's activities by the public and key stakeholders as a result of land degradation caused by changes in soil structure during the implementation of the project.

We have not identified material opportunities related to biodiversity and ecosystems.

Developments in biologically active areas can lead to a reduction in green spaces and potential soil degradation. The construction process may affect soil structure and local ecosystems. Soil sealing resulting from warehouse construction represents a permanent land alteration that diminishes its ability to absorb water, potentially contributing to local flooding. This sealing reduces the soil's capacity to absorb and store water, which can decrease soil moisture in adjacent areas and promote desertification processes. Additionally, the construction of storage facilities often involves the removal of the humus layer, negatively impacting the local ecosystem. Conversely, we implement measures to enhance biodiversity, such as planting trees, reducing grass mowing in storage areas, preventing the introduction of invasive alien species, and retaining rainwater by planting woodlands in wastelands. We also ensure the use of non-invasive species for greening and relocate valuable plant species to safe areas. Our projects delivered in 2023 did not impact any endangered species listed on the European Red List or the IUCN Red List, as confirmed by detailed assessments conducted in collaboration with ecologists.

A list of significant locations, including warehouse buildings under our operational control, is presented in Chapter 1 of this report.

Two of our sites are situated within biodiversity-sensitive areas, specifically:

### **7R City Park Gdańsk Airport I – Sąsiedzka**

facility located in the buffer zone of the Tri-City Landscape Park, area of 4.69 ha;

### **7R City Flex Kraków Airport I**

a facility located within the boundaries of the Tenczyński Landscape Park, area of 11.3 ha.

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These schemes do not negatively affect protected areas and do not lead to the deterioration of natural habitats and habitats of species. During the construction of both facilities' mitigation measures have been implemented as per the Local Planning Authority including, e.g., felling of trees and shrubs outside the breeding season of birds, the use of native plant species, construction process to prevent the ingress of pollutants into groundwater, surface water and soil. It is assumed the measures reduced the negative impact on the environment in line with the Environmental Impact Assessment.

The double materiality process did not identify material negative impacts with respect to land degradation, desertification or soil sealing.

Detailed information on the process of identifying and assessing material impacts, risks and opportunities related to pollution is presented in Chapter 1 of this report.



[E4-1] **TRANSITION PLAN AND CONSIDERATION OF BIODIVERSITY AND ECOSYSTEMS IN STRATEGY AND BUSINESS MODEL**

In 2023, the Company did not have a biodiversity transition plan. The ESG strategy adopted in 2024 includes strategic goals for biodiversity. The strategic objectives relating to biodiversity are set out below. In 2023, we did not assess the resilience of our strategy and business model against the biodiversity.

It is worth noting that we have made a commitment to develop a biodiversity plan for each project that begins after the third quarter of 2023, which will minimise the impact of our activities on local ecosystems.

[E4-2] **POLICIES RELATED TO BIODIVERSITY AND ECOSYSTEMS**

Our ESG Strategy, adopted in 2024, addresses aspects related to the management of biodiversity and ecosystems.

Currently, we do not have a biodiversity and ecosystem protection policy in place; however, we intend to develop and formally implement such a policy by 2025. The policy will consider the significant impacts on biodiversity resulting from our activities, as well as the associated risks and opportunities, and it will comply with the requirements of the EU Taxonomy. The objective of our policy will be to protect and maintain ecosystems in the areas where our investments are carried out.

[E4-3] **ACTIONS AND RESOURCES RELATED TO BIODIVERSITY AND ECOSYSTEMS**

We manage all our investments in accordance with the guidelines set forth by BREEAM certification. As part of these guidelines, an ecologist prepares an environmental report for each development, which includes recommendations that exceed standard requirements, such as planting designated areas of wildflower meadows or installing insect hotels. These recommendations are implemented in all our projects. Every development complies with the environmental planning conditions established by the Local Planning Authority, including any mitigation measures mandated by environmental decisions and ecologists. The general contractor appointed for specific schemes are required to adhere to these planning conditions and Building Standards. The contract documentation encompasses all requirements for the building, including critical aspects related to biodiversity protection.

The implementation of each investment is preceded by thorough assessment as part of the EDD (*Environmental Due Diligence*) and SDD (*Sustainability Due Diligence*) with special attention paid to impact on the environment, including biodiversity. The investment process begins with a detailed assessment of the location that has been selected as a potential site for the development. The company does not invest in protected areas. Where proposed developments are scoped at locations with high biological value, environmental inventories are carried out with the participation of ecologists.

For each project whose construction began after the third quarter of 2023, we have developed a biodiversity plan.

One of the Company's priorities is to offset lost vegetation. In 2023, we planted 661 trees and 6399 shrubs as part of offset plantings. In addition, in order to support local flora and fauna, we have established flower meadows on an area of 26,209 m<sup>2</sup>. These meadows were established in the following projects: 7R City Flex Kraków Airport I, 7R City Flex Katowice, 7R Park Kielce and 7R City Park Gdańsk South II – Lublewo. Meadows are cultivated as an additional measure, with their implementation agreed upon and consulted with an ecologist. These green spaces not only enhance the aesthetics of the surroundings but also serve as

ecological corridors, playing a crucial role in biodiversity protection. Last year, we installed nesting boxes for birds and insect hotels to support local species' populations.

Across selected projects, we plan to implement green roofs which will enhance the localized biodiversity and reduce the negative impact of pluvial floods.

To preserve natural habitats, we actively remove invasive species that threaten local ecosystems. In 2023, as part of the environmental inventory for planned developments, we introduced an additional requirement to check the area for the presence of alien species against a checklist. When such species are identified on-site, a remedial plan is developed and verified by an ecologist. For instance, the Kały Wrocławskie scheme, completed in mid-2024, involved the removal of over 40,000 m<sup>2</sup> of Canadian goldenrod. This removal process was externally verified following the scheme's completion, and the same procedure will be applied in future projects.

A comprehensive assessment of the area is conducted for all schemes before their commencement, considering not only ecological values but also the impact on surrounding areas. As part of the BREEAM certification requirements, we also analyse the impact of the investment on nearby areas of natural value. Key factors that can negatively affect the environment include noise pollution during the construction phase and increased vehicle traffic from onsite deliveries. Additionally, a significant challenge is the reduction of green spaces due to construction activities. While most of these negative impacts are temporary, we take great care to mitigate them post-implementation, for example, through additional planting based on an ecologist's recommendations.

Each project we carry out is subject to a detailed environmental assessment. Potential site contamination data is collected and, if necessary, specialists' tests are carried out by external land remediation professionals. We avoid carrying out investments in protected areas. In instances where it is necessary to proceed with developments in regions of high biological value, comprehensive environmental inventories are conducted with the participation of ecologists. Each of our developments is preceded by a wildlife inventory, and if it is necessary to cut down trees, we use replacement plantings. We are aware that the construction process can be burdensome for local communities and the environment, which is why we implement all possible measures to minimize the negative impact on the areas.



## We planted



**661**  
trees



**6399**  
bushes



**26 209 m<sup>2</sup>**  
of flower meadows





The compensation measures we have taken have been implemented in full compliance with the requirements set out in the environmental decisions, which was aimed at minimizing the negative impact on the natural environment. In carrying out these activities, we took great care to meet all legal obligations. However, in 2023 we did not carry out an impact assessment of completed developments.

[E4-4] **TARGETS RELATED TO BIODIVERSITY AND ECOSYSTEMS**

In 2023, we made a commitment to develop a biodiversity plan for every project that starts after the third quarter of 2023. The ESG Strategy implemented in 2024 expands the biodiversity and ecosystems objectives:

## Strategic targets – Biodiversity and ecosystems

ESG Strategy Pillar	Target	KPIs	Base year	Target	SDGs	Tasks of the 2030 Agenda
<b>ADD VALUE FOR OUR CLIENTS</b>	We will develop a biodiversity development plan for all our new investments.	Number of new investments with a biodiversity development plan in the reporting year compared to the total number of investments/per reporting year	Q4 2023	Current		15.A Mobilise and significantly increase funding from various sources for the conservation and sustainable use of biodiversity and ecosystems.
<b>LEAD LOW CARBON TRANSFORMATION</b>	We will implement an environmental policy that covers biodiversity issues.	Policy implementation ( <i>Implemented/Not Implemented</i> )	2024	2025		15.A Mobilise and significantly increase funding from various sources for the conservation and sustainable use of biodiversity and ecosystems.



*These targets are in line with the post-2020 Global Biodiversity Framework, the EU Biodiversity Strategy for 2030 and national biodiversity and ecosystem policies and legislation.*

The environmental target for 2023 assumed that a biodiversity plan would be developed for each project where construction would begin after the third quarter of 2023. We have achieved this target by implementing procedures to assess environmental impact during the planning and implementation stage. Each plan has been designated to project and local environmental conditions, which allowed to minimize the negative impact on ecosystems. In 2023, we developed a single biodiversity plan, to meet the commitment

for every project commencing after the third quarter of 2023. In addition, we have started preparing plans for the remaining investments by conducting a biodiversity assessment for all the plots we have acquired as part of Sustainability Due Diligence.

These projects are aimed to identify and minimize the negative impact of our investment activities on local ecosystems. They aim to ensure sustainability within our business. The development of biodiversity and ecosystem policies provides the basis for understanding and taking into account the identified impacts, risks and opportunities arising from our activities. Offsetting trees/shrubs reduces the negative impacts, such as tree felling in biologically active areas. This triggers the replacement of loss planting with their replacements as the mitigation measure. This makes it possible to restore ecosystems and reduce the negative impact on the environment. Developing biodiversity plans for all new projects ensures that every investment project we undertake has a clearly defined plan that takes into account the protection and management of biodiversity. By implementing appropriate remedial measures, we are able to minimize negative impacts, such as reducing the area of green spaces and changes to soil structure.

In the process of setting the objectives, ecological metrics were not used to determine the level or condition of key ecological parameters that could have a significant impact on the ecosystem. This is mainly due to the insufficient amount of available scientific data that is necessary to precisely determine the scope. Identifying them requires detailed research and solid information about the specific ecosystem. In many cases, this data can be incomplete, difficult to obtain or too varied, making it much more difficult to analyse. Another important aspect is the dynamics of the natural environment, which is subject to a constant change, from natural human activity causes. Fixed ecological metrics may not reflect changing conditions, making them highly problematic.

[E4-5] **IMPACT METRICS RELATED TO BIODIVERSITY AND ECOSYSTEMS CHANGE**

In 2023, we achieved the environmental goal of developing a biodiversity plan for each project where construction began after the third quarter of 2023. Each plan has been individually tailored to the specific project needs and local environmental conditions, to minimise the negative impact on ecosystems. In 2023, we have completed the development of one biodiversity plan and commenced work on another four.

## Resource use and circular economy

At 7R Group, we implement appropriate waste management principles within the company, where the primary waste generated consists of municipal waste, which we sort in accordance with applicable regulations. We strive to improve efficiency in resource and waste management by adopting circular economy principles in areas where we identify significant impacts within our value chain.

To reduce waste quantities and minimise their negative environmental impact during the design and construction phases of our warehouses, we establish waste management guidelines in collaboration with the general contractor.

[IRO-1] **MATERIAL IMPACTS, RISKS AND OPPORTUNITIES**

The materiality assessment covered the aspects of resource use and the circular economy. These topics included: resource inflows and resource outflows related to products and services, including waste and waste management issues.

As a result of the assessment, issues related to resource impacts were identified as key challenges.

Our impact on resource use and the circular economy is related to negative impact stemming from waste generation associated with the construction of warehouse facilities. The production and management of waste necessitate the use of natural resources, such as energy, water, and raw materials.

We have not identified material risks and opportunities related to the use of resources and circular economy.

Detailed information on the assessment process to identify material impacts, risks and opportunities related to pollution is presented in Chapter 1 of this report.

[E5-1] **POLICIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY**

Our ESG Strategy for the period leading up to 2030 encompasses aspects related to resource use and the circular economy, with a commitment to designing all warehouse buildings in accordance with BREEAM Excellent requirements. These requirements include efficient use of raw materials, monitoring resource consumption, waste segregation, waste minimisation, and promoting recycling and the reuse of materials, alongside the introduction of innovative technological solutions that support resource efficiency and minimise environmental impact.



Currently, we do not have a policy regarding the circular economy. However, we plan to develop and formally implement an environmental policy addressing circular economy issues by 2025. Additionally, we intend to establish detailed guidelines for general contractors regarding the management of construction waste. The environmental policy will outline fundamental principles for waste management on construction sites, aiming to ensure that a minimum of 70% of waste is sorted from each site. This target is also aligned with BREEAM guidelines and applies to all our projects.

[E5-2] **ACTIONS AND RESOURCES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY**

In 2023, we have implemented work streams aligned with the circular economy framework, the applicable regulations and the requirements of BREEAM certification.

At the design and construction stages of our warehouses, we establish waste management guidelines in collaboration with general contractors. We require the contractors to estimate the anticipated volume of construction waste and to monitor its levels according to an established plan. Additionally, we mandate waste segregation during the construction process, along with documentation of their removal and processing by specialised waste collection and recycling firms. Construction waste generated from 7R projects is recycled in accordance with BREEAM certification requirements.

Effective use of materials during construction is further ensured by their proper storage, which minimizes the risk of damage. Our requirements in this area include the use and rental of formwork and the use of a certified wood only.



Our general contractors are required to avoid over-ordering materials and reusing construction phase materials, such as rubble or soil. We also recommend using reusable packaging.

In the context of our own operations related to waste production and resource management in offices, at 7R we recycle waste, use recycled or EcoLabel-certified paper. We are preparing to introduce BIM (Building Information Modelling) across our projects to introduce paperless project documentation and increase resource efficiency during construction. We have also introduced electronic document workflow and the SAP system, which streamlines the digitization process.

In 2023, we were actively involved in activities related to the use of resources and the promotion of the circular economy, in particular in the context of ongoing construction projects. A key element of these activities was cooperation with general contractors, who were required to manage waste in accordance with the guidelines of the BREEAM certification process. Thanks to these activities, we were able to segregate over 86% of waste generated on construction sites during 2023. Waste containers on construction sites have been marked with information about their types and codes. The contractors had to provide containers for hazardous waste and segregate municipal waste.

By setting a target for waste segregation on the construction site and for the reduction of mixed waste, we have more control over the process of its reuse. Although contractors are responsible for their own waste management, we ensure they follow our guidelines across all new building sites.

The activities we have planned are aimed at further minimizing the negative impact on the environment by promoting the sustainable use of resources and to close building materials loop.

**86%**

*construction waste generated on our construction sites in 2023 was sent for recycling*






[E5-3] **TARGETS RELATED TO RESOURCE USE AND CIRCULAR ECONOMY**

Our environmental goal for 2023 regarding waste management was to achieve a minimum of 70% waste segregation at each construction site. We successfully exceeded this target, achieving a waste segregation rate of 86%. Furthermore, for every project that commenced construction after the third quarter of 2023, we have committed to assessing the circularity of the investments, and this objective is currently being pursued.

The Executive Board of our company is responsible for implementing the target, monitoring progress and adapting the strategy in response to regulatory and market changes.

## Strategic targets – Circular economy

ESG Strategy Pillar	Target	KPIs	Base year	Target	SDGs	Tasks of the 2030 Agenda
<b>LEAD LOW CARBON TRANSFORMATION</b>	We will implement environmental policy including issue of circular economy.	Policy implementation (Implemented/Not Implemented)	2024	2025		<b>12.5</b> By 2030, significantly reduce waste generation through prevention, reduction, recycling and reuse.

[E5-3] The objective has a direct reference to resource management, as well as to the inflows and outflows of waste and products and materials, and addresses the following issues:

## TARGET AND RELEVANT ISSUES FOR THE CIRCULAR ECONOMY AND SUSTAINABLE USE OF RESOURCES

Question	Assessment	Justification
The increase of circular product design (including for instance design for durability, dismantling, reparability, recyclability etc)	Yes	The target supports design for durability, decommission, repair and recycling, which minimizes waste and makes it easier to reuse materials. The target also applies to the implementation of design process.
The increase of circular material use rate	Yes	The target is to increase the reuse rate of materials. Achieving the target will lead to more materials being reintroduced into the construction cycle, reducing the need for raw materials.
The minimisation of primary raw material	Yes	The implementation of the target will reduce the demand for raw materials. Sending waste for recycling and recovery reduces dependence on new raw materials, which is crucial for minimizing their use.
Sustainable sourcing and use (in line with the cascading principle) of renewable resources	Yes	The target is to promote recycled sourcing practices that provide a sustainable source of resources. The use of these resources in accordance with the cascade principle allows for optimal use of renewable resources, which reduces the negative impact on the environment.
The waste management, including preparation for proper treatment; and	Yes	The target focuses on effective waste management through segregation, processing and recycling, starting from the construction stage.
Other matters related to resource use or circular economy	Yes	The target supports more efficient resource management, waste reduction and the promotion of circular economy practices.

Our target applies to all levels of the waste hierarchy<sup>1</sup>.

## [E5-4] RESOURCE OUTFLOWS

The 7R Group is responsible for the development of buildings, while the general contractors are responsible for the entire construction and assembly process, including the purchase of the necessary materials. As part of construction sites, the key materials are: concrete, steel, plastics and glass.

In 2023, we did not collect data on natural and manufactured materials (purchased natural resources, products and materials) used in the construction of warehouses.

<sup>1</sup> The waste hierarchy includes: a) prevention; b) preparation for re-use; (c) recycling; (d) other recovery methods, e.g. energy recovery; and (e) disposal

	Unit	Stores		Change FY23/ FY22 [%]
		FY 2022	FY 2023	
<b>Waste diverted from disposal</b>				
Preparation for reuse	t	-	0	-
Recycling	t	-	287,73	-
Other recovery operations	t	-	0	-
Total amount of waste diverted from disposal	t	-	287,73	-
<b>Waste directed to disposal</b>				
Incineration	t	-	0	-
Landfill	t	-	45,67	-
Other disposal operations	t	-	0	-
Total amount of waste directed to disposal	t	-	45,67	-
Total amount of radioactive waste	t		-	
Total amount of waste generated	t		333,4	
Total amount of non-recycled waste	t		45,67	
Percentage of non-recycled waste	%	64,76	13,70	-51,06 p.p.

The presented data on the total quantities of waste from own operations are taken from waste transfer notes and statements on the recycling process made available by the general contractors. The data refers to non-hazardous waste.

## [E5-5] RESOURCE OUTFLOWS

In 2023, we have commenced data collection process for the amount of waste generated during the construction of storage facilities.

In 2023, the total amount of waste generated during the construction process was 333.4 tonnes. The total amount of waste for which disposal was avoided was 287.73 tonnes – this waste was recovered in the form of recycling. The waste generated was not subject to other recovery processes. Part of the waste was sent to landfill – 45.67 tons. The percentage of non-recycled waste was 13.7% in 2023 and decreased by 51% compared to 2022. We did not collect similar data in 2022, hence no comparative data were presented.

Whilst disclosing waste management data, the focus of the 7R Group is to present information related to the construction phase waste management. In particular, the key types of waste generated by 7R's activities are construction waste, such as rubble, metal, packaging and insulation materials. The following materials are mainly found in residual waste: plastics, ceramic materials, metal.

In order to calculate the total recycling levels, we use different methods depending on the stage of the project. For completed projects, data on the amount of waste is obtained from direct measurements carried out by waste collection companies.

For projects that commenced construction in 2023 but were not completed by the end of the year, we employ two different approaches for calculating the data. For projects such as 7R Park Wrocław West II and 7R Park Tczew III, we utilised waste documentation provided by the contractors, which aligns with the documentation from projects completed in 2023. In these cases, the waste data is directly comparable to that of completed projects.



Conversely, for the 7R Park Gdańsk III – Phase 1 and 7R BTS Czechowice South IV projects, where waste documentation has not yet been submitted, the data has been estimated. These estimates are based on average waste production and average recycling rates, which are determined from data collected from other projects. This approach enables us to estimate waste quantities during the initial phases of construction when complete documentation is unavailable.

Our assessment methods provide reliable waste data and enable the monitoring and management of waste in the different phases of project implementation.

At 7R, we employ 159 individuals, which, given the scale of our operations, translates to a relatively small number of offices and a limited amount of waste generated from daily office activities. In the context of the double materiality analysis, it has been determined that this waste is not significant concerning the overall environmental impact of the company. The main waste streams produced by our offices include paper, mixed waste, plastics, used light bulbs, and batteries. We do not conduct our own measurements or estimates regarding the amount of waste generated in our offices. This waste is managed by external companies responsible for its collection, contracted by the building owners, and as such, we do not have detailed data on the quantities or processing methods employed.

# 03

## Social *issues*



# 7R Group Employees

Term „employees” refers to all individuals employed by the 7R Group, including those under employment contracts and anyone providing services to the 7R Group based on civil law agreements (B2B contracts), appointments, or other legal forms. This includes business owners, as well as members of management and leadership teams within the various entities of the Group. In 2023, we employed a total of 159 staff members, comprising 155 individuals in Poland, 3 in a subsidiary in the Czech Republic, and 1 in a subsidiary in the Netherlands.

[SBM-3] [IRO-1] [S1-4]

## MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

We have identified and assessed actual and potential impacts, risks and opportunities in the Human Resources area. The results of the double materiality assessment have identified material positive impacts on our employees, such as:

### IMPACTS, OPPORTUNITIES AND RISKS IN THE AREA OF OWN EMPLOYEES

- Impact on increasing employee satisfaction by offering secure employment guaranteed by the employment contract and offering an extended notice period – in accordance with the labour law. The company initially hires for a 3-month probationary period after which permanent contract is offered to successful candidates.
- Impact on increasing the sense of security of employees by offering a social benefits fund to all full-time employees (excluding B2B contracts).
- Impact on employee satisfaction through regular salary reviews and remuneration process based on employee competences, including financial and non-financial incentive system.
- Impact on employees career and skills development by providing training tailored to the needs of individuals
- Impact on employee satisfaction through well-being initiatives, e.g. shortening the working week (6-hour work on Fridays) or organizing health and wellbeing campaigns.

We also saw a material opportunity to increase revenues by investing in highly skilled workforce by providing a bespoke training offer.

We have not identified any material negative impacts and risks in the HR area. Information on double materiality assessment is presented in Chapter 1.



[S1-1] **POLICIES RELATED TO OWN WORKFORCE**

Issues concerning employees are regulated in accordance with the Labour Law and internal policies. The People & Culture Department is responsible for the implementation of employee policies in the 7R Group . The Executive Board is responsible for approving policies. We have a number of employee policies, including:

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**Code of Employment**

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**Remuneration Policy**

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**Code of Ethical Conduct, which is part of the 7R Code of Good Practice.**

All employees are required to adhere to the principles outlined in the Code of Conduct, which includes the following aspects:

- **Equality:** Ensuring equal opportunities for employment, professional development, and career advancement; equal treatment in terms of employment conditions; and equal access to promotions.
- **Prevention of bullying and discrimination:** Taking measures against any forms of bullying and discrimination based on age, gender, ethnicity or nationality, political, philosophical or religious beliefs, health status, disability, marital status, sexual orientation, union membership, or any other legally protected characteristics.
- **Development and teamwork:** Encouraging continuous self-improvement and striving for work results that reflect each employee's knowledge, experience, qualifications, and abilities.
- **Respect for others:** Treating fellow employees with respect and valuing their dignity and privacy.
- **Support for colleagues:** Assisting others by sharing knowledge and professional experience.
- **Creating a positive work environment:** Fostering a good atmosphere at work and maintaining a high standard of personal culture.

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**Recruitment, training and development policy – the policy focuses on three key areas:**

- Sharing knowledge within the organization,
- Strengthening cooperation and commitment, developing leadership and specialist competences, such as conducting negotiations or increasing the effectiveness of communication,
- Improving the effectiveness of training.

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**Regulations of the Social Benefits Fund**

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**Personal data protection policy**

In addition, we comply with occupational health and safety (OHS) regulations and periodically carry out audits by external bodies to prevent accidents at work.

The H&S policy is applicable to all employees of the 7R Group. Employee representatives are consulted on the aforementioned policies in advance of their approval.

Each employee has equal access to training and promotion opportunities, including internal recruitment processes. All employees can utilize the training cafeteria. The People & Culture Department, the Management Board, and individual managers are responsible for ensuring equal treatment and opportunities regarding employment and promotions, adhering to the internal Work Regulations.

The People & Culture Department manages email communication with key stakeholders concerning the implementation and updates of policies. Additionally, policies are made accessible through dedicated internal communication channels, such as the Worksmile platform and the internal HR system. Employees receive training on the Code of Ethical Conduct and other Group policies every three years.

In 2024, we plan to revise our employment policy to explicitly address equal access to training for all employees, conduct annual salary reviews, and ensure equal pay for equal work or work of comparable value, regardless of gender. Furthermore, the Code of Good Practice will be expanded to include a Human Rights policy aligned with OECD and UN guidelines.

All employees have access to an anonymous Whistleblower reporting system. The Compliance Officer is tasked with managing complaints received from internal staff. In 2023, no violations of human rights were reported



[SBM-2] [S1-2]

## PROCESSES FOR ENGAGING WITH OWN WORKERS AND WORKERS' REPRESENTATIVES ABOUT IMPACTS

The management staff, the Executive Board and the People & Culture Department are responsible for ensuring cooperation and communication across all tiers of the workforce. Daily communication with employees takes place through the direct supervisor, and employee reports are taken into account by supervisors when making daily decisions. Communication with employees is also carried out using a number of tools, such as anonymous and open to all staff surveys. Employee questions are anonymously forwarded to the Executive Board, which answers them during national and regional meetings. In 2023, formal employee representatives were appointed.

In 2023, our employees were involved in the process of identifying and assessing material topics as part of the double materiality analysis. Employees' feedback was collected, e.g. through surveys, and their responses were analysed and included in the assessment as a contribution to the sustainable target setting.

In 2023, the implementation of an anonymous online tool began to regularly assess employee sentiments and gather feedback.

[S1-3]






## PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKERS TO RAISE CONCERNS

An Anonymous Whistleblowing Channel is available to all our employees, through which any employee can report situations contrary to the principles of the Code of Good Practice, including:

- activities with the characteristics of criminal activity,
- cases of abuse of authority or failure to perform material professional duties by an employee or failure to comply with obligations by a supplier towards 7R Group (e.g. violation of the Gift Policy or unauthorized disclosure of 7R Group's trade secrets),
- activities with the characteristics of bribery or corruption,
- activities that constitute financial fraud or improper management,
- violation of other internal policies or procedures,
- unauthorized disclosure of confidential information,
- unethical behavior,
- intentionally concealing or covering up the above abnormalities.

*We ensure that each person making a report has the confidentiality and anonymity of their identity, including adequate protection of personal data, as well as protection against repressive actions, discrimination or other forms of unfair treatment. The personal data of reporting persons and persons alleged to have committed breaches are protected in accordance with our internal policies and procedures, including the Personal Data Protection Policy, and in accordance with applicable laws. In order to properly resolve the case, we conduct a dialogue with all parties involved in the report, giving the reporting person, witnesses and the accused the opportunity to speak.*

## Strategic targets – Employees

ESG Strategy Pillar	Target	KPIs	Base year	Target	SDGs	Tasks of the 2030 Agenda
<b>GROW AS INDIVIDUALS AND COMMUNITIES</b>	We will revise internal policies and regulations to include: <ul style="list-style-type: none"> <li>• Equal access to training for all employees,</li> <li>• Annual salary reviews</li> <li>• Equal pay for equal work or work of equal value, regardless of gender,</li> <li>• 100% of employees participate in performance evaluations, including setting annual business goals.</li> </ul>	Introduction of employment policy.	2024	2026		<b>12.6</b> Encourage companies, especially large and multinationals, to implement sustainability practices and include sustainability information in their periodic reports.
<b>GROW AS INDIVIDUALS AND COMMUNITIES</b>	At least 75% of employees will participate in eNPS surveys.	The number of active employees* who participated in the satisfaction survey compared to the total number of active employees in the reporting year.	2024	Ongoing		<b>8.2</b> Achieve a higher level of economic productivity through diversification, technological modernisation and innovation, and by focusing on sectors with high added value and labour intensity.
<b>GROW AS INDIVIDUALS AND COMMUNITIES</b>	We will encourage employees to take leave, aiming to set the carry over leave days to 10 days per employee (20 days in 2025, 15 days in 2026, 10 days in 2027).	The number of days of overdue leave per employee* cannot exceed 10 days for all active employees/per reporting year**.	2025	Ongoing		<b>8.8</b> Protect workers' rights and promote a safe working environment for all workers, including migrant workers, in particular migrant women and people in precarious employment.
<b>GROW AS INDIVIDUALS AND COMMUNITIES</b>	We will implement at least 12 initiatives supporting the well-being of employees during the year.	Organization of an average of one event supporting employee well-being per month.	2023	Ongoing		<b>8.8</b> Protect workers' rights and promote a safe working environment for all workers, including migrant workers, in particular migrant women and people in precarious employment.
<b>GROW AS INDIVIDUALS AND COMMUNITIES</b>	100% of offices will be subject to an external security audit.	The number of offices that have passed an external security audit compared to the total number of offices/ in the reporting year.	2022	Ongoing		<b>8.8</b> Protect workers' rights and promote a safe working environment for all workers, including migrant workers, in particular migrant women and people in precarious employment.

\* Applies to all active employees, regardless of their position, i.e. employees who are employed, not on notice, on long sick leave (more than 33 days) or benefit over 30 days, and who are not on notice.

\*\* Applies to 10 days within the time limit set by 7R.

# Detailed data on 7R Group employees

## [S1-6] CHARACTERISTICS OF EMPLOYEES

The data presented in Tables 1-13 refer to the parent company 7R S.A. and subsidiaries belonging to the 7R Group. Employment figures are presented for the period from 1.01.2023 to 31.12.2023 and refer to the number of employees (in persons). The number of employees is presented on the basis of the total number of employees at the end of the reporting year.

Data for the employee area was presented for the first time in a sustainability report in accordance with the ESRS. In previous years, data in this regard were not disclosed. The definition of an employee is presented at the beginning of chapter 3.1.

## [S1-6] NUMBER OF EMPLOYEES IN THE 7R GROUP BY GENDER

Gender	Number of employees
Female	89
Male	70
Other	0
Not reported	0
<b>SUM</b>	<b>159</b>

The total number of staff within a year. Employees are all persons employed in the 7R Group, both under an employment contract and any person providing services to the 7R Group on the basis of a civil law contract (B2B contract), appointment or other contractual arrangements, including people providing services to the business. This total includes members of the management and management staff of departments as part of the Group.

## NUMBER OF STAFF IN THE 7R GROUP BY THE EMPLOYMENT TYPE AND GENDER IN 2023

Women	Men	Other	Undefined	Total number of employees
<b>Number of employees (total number)</b>				
89	70	0	0	<b>159</b>
<b>Number of permanent employees (total number)</b>				
78	67	0	0	<b>145</b>
<b>Number of temporary employees (total number)</b>				
11	3	0	0	<b>14</b>
<b>Number of employees with 'zero hours' contract (total number)</b>				
0	0	0	0	<b>0</b>

Number of full-time employees (total number)				
88	70	0	0	158
Number of part-time employees (total number)				
1	0	0	0	1

## STAFF TURNOVER IN 7R GROUP

	2023
Number of employees who left the organisation	14
Employee turnover rate	8,8%

The turnover rate only takes into account voluntary departures of employees and was calculated as its number divided by the total number of employees as of 31 December 2023.



[S1-9] **TOP MANAGEMENT EMPLOYMENT BY GENDER**

Gender	2023	Share (%)
Female	14	51,9
Male	13	48,1
Other	0	0
Not reported	0	0
<b>Total number of employees in top management</b>	<b>27</b>	<b>100</b>

[S1-11] **NUMBER OF 7R GROUP EMPLOYEES BY AGE GROUP**

Age Group	2023	Share (%)
Under 30 years old	28	17,6
Aged 30–50	118	74,2
Over 50 years old	13	8,2
<b>Total number of employees</b>	<b>159</b>	<b>100</b>

All of our employees in Poland are covered by social protection programs either through public programs or benefits provided by 7R. This coverage is guaranteed under the Polish Labor Code and the Company's Social Benefits Fund (Zakładowy Fundusz Świadczeń Socjalnych). All eligible individuals can apply for financial assistance from the Fund in cases of financial hardship or unforeseen events. Such events include, but are not limited to, fires, floods, thefts, serious illness of a family member, natural disasters, or accidental events. This support aims to provide employees with essential aid in times of unexpected difficulty.

In 2023, 91.2% of employees, including 87.6% women and 95.7% men, took part in the annual performance & career development review. The average number of training hours per 1 employee was 28.5 hours, including 33.8 for women and 21.9 for men, where the total number of training hours was 4238.

In 2023, a number of soft skills and technical training courses were carried out to support employee's knowledge development. The training covered areas such as: management and personal development, communication and negotiation, finance and management, business development, industry training, business ethics and ESG topics, technologies and tools.

[S1-13] **NUMBER AND SHARE OF 7R GROUP EMPLOYEES WHO PARTICIPATED IN THE ANNUAL PERFORMANCE & CAREER REVIEW BY GENDER**

Gender	Number of employees	Share (%)
Female	78	87,6
Male	67	95,7
Other	0	0
Not reported	0	0
<b>All employees (regardless of gender)</b>	<b>145</b>	<b>91,2</b>

The table below shows the number of 7R Group employees who participated in the evaluation of performance and career development in 2023 broken down by gender.

[S1-13] **NUMBER AND AVERAGE TRAINING HOURS BY GENDER**

Gender	Number of training hours	Average training hours
Female	3004	33,8 (for 1 woman)
Male	1534	21,9 (for 1 man)
Other	0	0
Not reported	0	0
<b>Total number / average of training hours</b>	<b>4538</b>	<b>28,5 (for 1 employee)</b>

The table below shows the number and average number of training hours by gender. The average number of training hours is calculated based on the following formula: total number of training hours (training organized internally and by external entities) in 2023 divided by the total number of employees. For the average number of training hours per 1 employee, 1 woman, 1 man, the total number of employees was included in the denominator according to the data presented in disclosure S1-6.



**28,5 h** *average number of training hours per employee*



[S1-14] The health and safety policy applies to employees employed under an employment contract (65% of employees in 2023), based on health and safety regulations.

#### NUMBER OF ACCIDENTS AMONG EMPLOYEES AND NON-EMPLOYEES

CATEGORIES	2023
<b>Employees</b>	
Number of fatalities due to work-related injuries and ill-health	0
Number of recordable work-related accidents	0
Number of reportable cases of work-related ill-health, subject to legal restrictions on data collection	0
Number of days lost due to work-related accidents as a result of work-related accidents, due to work-related ill-health, and fatalities due to ill-health	0
Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health	0
<b>Workers working on the 7R's sites, such as value chain workers</b>	
Number of fatalities due to work-related injuries and ill-health	0
<b>Non-employees<sup>1</sup></b>	
Number of cases of work-related ill-health	-
Number of days lost to work-related injuries from work-related accidents, work-related ill health or fatalities from ill health	-
Number of days lost to work-related fatalities from work-related accidents, work-related ill health or fatalities from ill health	-

The data in this table are presented in accordance with the definition of an accident at work set out in the provisions of the Act of 30 October 2002 on social insurance for accidents at work and occupational diseases. Data on non-employees have been omitted from this report and will be presented in subsequent reporting years.

[S1-15] In 2023, 100% of employees employed under an employment contract were entitled to take leave for family reasons. In the reporting period, 26% of women and 11% of men under employment contract took leave for family reasons.

[S1-17] In 2023, we recorded no work-related incidents<sup>2</sup> or complaints and no Human Rights violations employees related fines, sanctions or compensation.

1 In accordance with the term defined by the European Commission in the Annex to Commission Delegated Regulation (EU) .../... supplementing Directive 2013/34/EU of the European Parliament and of the Council with regard to sustainability reporting standards, persons who are not employees are the entity's own employees, i.e. persons bound to the entity by contracts for the provision of work („self-employed persons“), persons provided by entities carrying out primarily „employment-related activities“ (NACE code N78).

2 It concerns incidents that would be contrary to the principles set out in the UN Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises (failure to report to the OECD National Contact Point (OECD NCP) and no allegations against those made by the Business and Human Rights Resource Centre (BHRRC) or other legal entities).

# Workers in the value chain

[SBM-3] [IRO-1]

## MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

As part of the double materiality analysis, we identified two themes relevant to people working in the value chain:

- Impact on the health and safety of employees in the value chain through contracts clauses imposing strict compliance with 7R health and safety standard and regular audits of safety systems used on the site. 7R expects contractors to provide periodic health and safety training to their employees and requires them to submit periodic reports on the status of their health and safety procedures.
- Impact on communication and ethical culture in the value chain by providing a Whistleblower mechanism for suppliers to report breaches and comments.



A key group of workers impacted by our activities includes those employed by general contractors who perform construction work during the execution of our projects. Health and Safety (H&S) is a critical issue, focusing on ensuring safe working conditions and adhering to H&S standards as specified in contracts and the requirements of BREEAM certification. Additionally, the topic of measures to prevent violence and harassment in the workplace has been identified as material.

We have not identified significant negative impacts, risks, or opportunities in this area during our analysis. Our projects are currently carried out within Poland, which greatly reduces the risk of child labor, forced labor, or compulsory labor within our value chain. Furthermore, we have not identified significant risks related to unethical employment conditions for those performing work within our value chain.

[S2-1]

## POLICIES RELATED TO VALUE CHAIN WORKERS

We comply with national laws and regulations at all stages of project development. During the design phase our priority is to eliminate H&S risks to construction workforce. During the construction itself, we manage, monitor and report regularly to ensure the highest standards of health and safety protection for workers on the construction site.

Each supplier<sup>1</sup> is required to read and comply with the Bribery and Corruption Policy and Confidentiality Procedure. In addition, on most of our construction sites, we require compliance with BREEAM guidelines regarding the provision of a lit and properly fenced construction site and the maintenance of the site access.

## [S2-2] PROCESSES FOR ENGAGING WITH VALUE CHAIN WORKERS ABOUT IMPACTS

In order to manage, mitigate and eliminate negative impacts on the value chain workforce we require:

- compliance with the Bribery and Corruption Policy and the Confidentiality procedures by each general contractor
- regular supervision on construction sites,
- site visits.

Project Managers are informed about accidents on the construction site and other issues concerning construction H&S as part of regular progress meetings with general contractors. The contractors are responsible for safety working and construction management as per the Building Regulations.

The representatives of individuals working within the value chain are the representatives of general contractors and other business partners. Communication takes place through Project Managers responsible for specific investments, and this process is overseen and monitored by members of the 7R Group's Management Board. As part of the double materiality analysis, selected general contractors participated in a sustainability importance survey by completing a dedicated questionnaire. The feedback collected was used to validate key sustainability topics. Detailed information on the double materiality analysis is presented in Chapter 1 of the report.

## [S2-3] PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR VALUE CHAIN WORKERS TO RAISE CONCERNS

We have an internal Whistleblowing Policy dedicated to 7R Group employees, which has been included in the 7R Group Code of Good Practice.

We have begun work on implementing a Whistleblowing Policy for the value chain workforce, with the goal of putting it into effect in 2024.

1 Supplier – any entity or natural person conducting business activity or any other person performing services for the 7R Group, supplying any products to the 7R Group or acting as a contractor, contractor, etc. as part of investments carried out by 7R Group, as well as any persons or entities providing services in the preparation or acquisition of documentation necessary for the implementation of 7R Group's investments, real estate, Clients or administrative decisions or in the field of consulting in the above-mentioned areas (source: 7R Code of Good Practice).

[S2-4]

## TAKING ACTION ON MATERIAL IMPACTS ON VALUE CHAIN WORKERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO VALUE CHAIN WORKERS, AND EFFECTIVENESS OF THOSE ACTION

The double materiality assessment main risks for the value chain workforce to be Health and Safety and t violence and harassment. To keep high standards for health and safety, we carry out a number of key activities:



### STANDARD GENERAL CONTRACTOR CONTRACT

Each 7R contract includes strict compliance with health and safety standards.



### REGULAR SAFETY SYSTEM AUDITS

Regular on-site audits to monitor and assess compliance with applicable health and safety standards and to identify potential hazards.



### PERIODIC HEALTH & SAFETY TRAINING

Prior working on site the contractor's workforce must evidence H&S training. These trainings are aimed at raising awareness of hazards and maintaining high safety standards on the construction site.




### PERIODIC HEALTH AND SAFETY REPORTS

Contractors are required to report on H&S procedures. These reports monitor the effectiveness of the security measures implemented and address areas for improvement.

We did not identify significant negative impacts, risks or opportunities for workers in the value chain.

## Strategic targets – Value chain workforce

ESG Strategy Pillar	Target	KPIs	Base year	Target	SDGs	Tasks of the 2030 Agenda
<b>LEAD LOW CARBON TRANSFORMATION</b>	We will implement environmental, health and safety guidelines for our general contractors.	Policy for general contractors implementations ( <i>Implemented/ Not Implemented</i> )	2025	2026		<i>8.8 Protect workers' rights and promote a safe working environment for all, including workers, including migrant workers, in particular migrant women and people in precarious employment.</i>

**[S2-5]** The sustainability goals of 7R focus on raising the standards of safety and work comfort on construction sites and promoting responsible health and safety management. The implementation of a policy concerning the environment, health, and safety for general contractors aims to ensure that all partners in the value chain adhere to high safety and quality standards in the workplace. Additionally, the policy seeks to establish guidelines for environmental protection. These goals were set based on material topics identified through a double materiality analysis, which included surveying the opinions of selected general contractors on the significance of sustainability issues.

## Affected communities

The communities impacted by our activities primarily include residents living near the areas where our projects are being developed. Some of these projects are located on the outskirts of cities, in close proximity to residential areas.

### **[SBM-3] [IRO-1] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES**

Material positive impacts of the 7R Group on affected communities include additional budget for local authorities to support various initiatives for residents indirectly improving the life of local communities by paying taxes to the municipalities where the investment takes place and supporting charitable foundations.

Neither material negative impacts nor opportunities have been identified.

For each project we undertake, we engage in communication with local authorities who represent the residents of the municipality. This approach allows us to identify the needs and expectations of the affected communities, ensuring that our actions are both consulted on and implemented in collaboration with these authorities. Additionally, all our investments are carried out in designated locations that have received building permits and environmental decisions in compliance with legal requirements. Our business model and ESG Strategy include a focus on contributing to local communities and outline specific goals in this regard, aligning our projects with broader social and environmental objectives.

### **[S3-1] POLICIES RELATED TO AFFECTED COMMUNITIES**

To date, we have not implemented a formal policy concerning cooperation with affected communities and the respect for human rights. However, our general contractors are required to

adhere to the 7R Group's Code of Good Practice, which outlines principles covering communication with suppliers, governmental or local authorities, charitable activities, and sponsorship, along with the Code of Ethical Conduct. As part of our ESG Strategy, we aim to implement a comprehensive social policy by 2026.

In addition, general contractors are also obligated to follow BREEAM requirements, which are discussed in detail later in this document.

[S3-3] **PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR AFFECTED COMMUNITIES TO RAISE CONCERNS**

We require our general contractors to implement best practices aimed at minimizing nuisances arising from the construction process, such as noise, dust, and pollution. These practices are aligned with applicable regulations, environmental decisions, and BREEAM certification requirements. The responsibility for managing and reducing negative impacts, as well as addressing and eliminating complaints, lies with the general contractor. As part of our double materiality analysis, no significant negative impacts on affected communities were identified.

[S3-2] [S3-4] **TAKING ACTION ON MATERIAL IMPACTS ON AFFECTED COMMUNITIES, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO AFFECTED COMMUNITIES, AND EFFECTIVENESS OF THOSE ACTION**

Our general contractors implement appropriate measures during the construction process to minimize and eliminate negative impacts on residents, in line with BREEAM requirements. These contractors are obligated to implement mitigation measures as outlined in environmental decisions, meaning that the provisions within these decisions must be enforced across all construction sites and projects. BREEAM guidelines require the availability of a complaints and grievances log for local residents and communities, ensuring that affected parties are informed about its existence. The implementation of additional actions is not voluntary but is based on consultations and agreements with local authorities. This ensures that actions are both adequate and effective in addressing the actual needs of the communities. However, no formal process for tracking and assessing the effectiveness of these measures among affected communities has been implemented so far.

At the stage of obtaining building permits and environmental decisions, our Business Development Department works closely with local authorities to ensure that our investments meet their requirements and the needs of the community. Within our construction projects, we allocate budgetary resources that may be used to support initiatives for local communities, in accordance with the requirements set by local authorities.



One of the established goals in our sustainability strategy is to engage in dialogue with local community representatives during the implementation of our investments.

General contractors are required to comply with BREEAM guidelines, which include a number of measures aimed at reducing negative impact associated with construction works. Local residents are informed about the planned start of construction works. Working hours and noise pollution restrictions are project specific, especially when the development is located near noise-sensitive areas such as residential buildings, schools or hospitals. The construction site boundary is clearly marked, safe and adapted to the environment, with adequate lighting and safe pedestrian crossings. The surroundings of the construction site are kept neat and clean. In addition, a complaint book is available at the reception desks of the construction sites, and local residents are kept informed about the progress of construction and have contact details for the site manager. Construction lighting is properly shielded, and site staff are encouraged to use dedicated welfare facilities and to take precautions with noise pollution.

We collaborate with representatives of local authorities and municipal institutions to assess the opinions, expectations, and needs of residents. This collaborative process occurs at various stages of the project, from obtaining environmental decisions and building permits to the completion of construction and the management of the investment. The Project Manager and Development Manager for each investment are responsible for communication with local authorities, while the entire process is overseen by the Board of 7R.

#### IN 2023, THROUGH THE LOCAL ENGAGEMENT WE HAVE CARRIED OUT THE FOLLOWING ACTIVITIES BASED ON THEIR IDENTIFIED NEEDS:



Purchase of water dispensers for thirteen schools in Bytom



Installation of a bicycle repair station available to local residents - 7R City Flex Kraków Airport I





Additional plantings (not required by the environmental decision) outside the plot - 7R City Flex Kraków Airport I

In 2023, we were involved in charity activities outside of our project areas, supporting the Zmieniamy Niemożliwe foundation. We also took part in JLL's charity beach volleyball tournament and donated graphics to a charity auction. In addition, we co-financed a family picnic in Kokotów and blankets for newborns in the Tczew community.

In 2023, there were no reports of serious issues or incidents related to human rights violations.

## Strategic Targets – Affected Communities

ESG Strategy Pillar	Target	KPIs	Base year	Target	SDGs	Tasks of the 2030 Agenda
<b>GROW AS INDIVIDUALS AND COMMUNITIES</b>	We will develop a community engagement policy to set guidelines for our involvement with local communities.	Implementation of a social engagement policy ( <i>Implemented/Not Implemented</i> ); % of investments where local communities were consulted compared to the total number of investments in a given year	2024	2025		<b>11.a</b> Foster positive economic, social and environmental links between urban, peri-urban and rural areas by strengthening national and regional development planning.
<b>GROW AS INDIVIDUALS AND COMMUNITIES</b>	We will support at least one community initiative each year, to support sport and healthy lifestyle, culture, education or charitable organization.	number of initiatives for local communities supported by 7R in a given year	2024	Current		<b>11.a</b> Foster positive economic, social and environmental links between urban, peri-urban and rural areas by strengthening national and regional development planning.

We plan to implement community engagement policy and continue the involvement of the 7R Group in local stakeholder engagement to address community needs and expectations. In addition, we intend to continue to support initiatives such as: sports, culture, education and charity.

## Consumers and end-users

[SBM-2] [SBM-3] [IRO-1]

### MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

Our clients represent a wide variety of industries, such as logistics, manufacturing, e-commerce, pharmaceuticals and automotive. They play a key role in our business model, shaping the direction of development and influencing our actions. Their expectations and needs are the foundation on which we base our strategies and decisions. We have identified two material positive impacts in this area:

- Impact on environmental protection, social welfare, supporting responsible business practices and promoting a sustainable economy by conducting regular engagement with customers, adapting the portfolio of products, technologies and building features to customer requirements in the field of sustainable development; regular monitoring of customer needs and expectations.
- Impact on informed decision-making process for customers, increase environmental awareness and responsible management by ensuring responsible marketing practices (e.g. providing substantive foundations for green solutions implemented in the buildings, clear guidelines for storage and warehousing, customer education, ensuring an Anti-Greenwashing Policy, ensuring responsible marketing practices).



As part of the analysis, we did not identify any material negative impacts, risks or opportunities related to human rights issues in this area.

[S4-1] **POLICIES RELATED TO CONSUMERS AND END-USERS**

The Code of Good Practices of the 7R Group encompasses various aspects such as general principles of ethical conduct in client relationships, confidentiality rules, and a policy regarding gifts. According to this Code, we treat our clients and their representatives with respect, ensuring their dignity and privacy, while adhering to principles of personal culture and good manners. We provide our clients with reliable and legally compliant information about our activities, including the scope of services offered. We commit to maintaining confidentiality and protecting all information related to our clients, following general confidentiality principles.

We plan to update the Code of Good Practices to include issues related to human rights. A due diligence procedure will be introduced to verify our key business partners, including tenants and general contractors, focusing on environmental protection, ensuring safe working conditions, and human rights. Additionally, we will implement an Anti-Greenwashing Policy that will establish rules for transparent and honest communication with our tenants.

[S4-2][S4-3]

Our business model is based on close collaboration with tenants and regularly assessing their needs and expectations regarding building projects. Communication occurs directly with tenant representatives at every stage of the investment process. Their involvement has a direct impact on the final shape of our investments, particularly regarding technical solutions and architectural layout. These decisions also significantly influence the implementation of ecological solutions for the projects undertaken. The effectiveness of our collaboration and actions is validated based on tenants' willingness to sign or extend contracts. Leasing Managers assigned to individual investments are responsible for ensuring operational oversight of tenant cooperation.

In 2023, selected tenants took part in the assessment of the materiality of sustainability topics. The collected opinions were analysed and taken into account in the process of determining important issues and establishing the strategic directions of the 7R Group.

In the buildings owned by the 7R Group, our property managers maintain regular contact with tenants. The teams responsible for this communication are the Leasing Department and the Property Management Department, which oversee the properties in the Group's portfolio. Property managers engage in continuous communication with tenants from the moment



the rental space is handed over. Tenants can directly report their concerns and needs to the Leasing Department, the Property Management Department, and Project Managers during the construction phase.

In 2023, we did not identify any serious cases or incidents related to human rights violations among our tenants.

[S4-4]

*We conduct a regular dialogue with tenants, monitoring and responding to their needs and expectations. In response to our customers' expectations, we update our product portfolio, expand the availability of building technologies and adapt solutions to the requirements of our customers.*






In terms of building solutions, we provide clear guidelines for storage in connection with fire safety, as well as educate customers on the sustainable use of our facilities to fully take advantage of the implemented low carbon solutions. We also focus on improving communication with customers and providing access to high-quality information. We plan to introduce an Anti-Greenwashing Policy and to train employees in this area. In addition, we use a variety of marketing channels, such as cooperation with local media, sponsorship of events or investment presentations.

Based on the BREEAM building standard, we introduce solutions supporting the safety of people working in warehouses. The buildings we manage are covered by fire safety instructions, as well as regular fire safety training. In addition, as part of the investment, we plan road traffic to ensure safe communication in and near the parks.



## Strategic targets – Consumers and end-users

[S4-5]

ESG Strategy Pillar	Target	KPIs	Base year	Target	SDGs	Tasks of the 2030 Agenda
<b>ADD VALUE FOR OUR CLIENTS</b>	Implementation of a tool to measure tenant satisfaction levels.	Implementation of tenant satisfaction surveys ( <i>Implemented/Not Implemented</i> ); % of tenants surveyed participated in the pool (calculated by the number of lease agreements)	2024	2025		<b>11.a</b> Foster positive economic, social and environmental links between urban, peri-urban and rural areas by strengthening national and regional development planning.
<b>ADD VALUE FOR OUR CLIENTS</b>	We will increase our efforts to raise awareness of sustainable buildings among our tenants. We will organize educational campaigns addressed to tenants, focusing on sustainable development, including waste management, energy efficiency and water conservation.	number of educational campaigns for tenants; % of tenants covered by educational campaigns (calculated after GLA)	2025	Current		<b>13.3</b> Increase the level of education and human and institutional capacity, raise awareness of climate change mitigation, adaptation and effects of climate change, and early warning systems against threats.
<b>ADD VALUE FOR OUR CLIENTS</b>	We will increase the share of gross leasable area (GLA) covered by green leases in our building portfolio.	% of leases covered by green clause agreements	2025	Current		<b>13.3</b> Increase the level of education and human and institutional capacity, raise awareness of climate change mitigation, adaptation and effects of climate change, and early warning systems against threats.
<b>ADD VALUE FOR OUR CLIENTS</b>	We will implement an Anti-Greenwashing Policy to ensure transparent and honest communication with our clients.	Implementation of an Anti-Greenwashing Policy ( <i>Implemented/Not Implemented</i> )	2024	2025		<b>11.a</b> Foster positive economic, social and environmental links between urban, peri-urban and rural areas by strengthening national and regional development planning.
<b>ADD VALUE FOR OUR CLIENTS</b>	For each project, we will prepare a tailored sustainability strategy to adapt the building to the needs of clients and the potential of the location.	% of new projects for which a project sustainability strategy has been prepared	2024	Current		<b>11.a</b> Foster positive economic, social and environmental links between urban, peri-urban and rural areas by strengthening national and regional development planning.

\* Dedicated group: tenants. Stage of the audit – Phase 1: transaction, Phase 2: use of the building (after the transaction). Frequency: six months / one year – to be determined.

\*\* The goal is qualitative – the specific number of initiatives to be implemented during the year has not been specified. The aim is to increase tenants' awareness of the positive impact of certification and the opportunities it provides (e.g. savings related to utility consumption). Examples of initiatives include: posters, constant communication, dedicated events.

# 04

## Corporate *governance issues*



# Business conduct

[SBM-3] [IRO-1] In the area of corporate governance, we identified the following positive impacts:

## CORPORATE GOVERNANCE IMPACTS, OPPORTUNITIES AND RISKS

- Impact on setting up ethical culture within the organization, which affects the sense of inclusion and satisfaction of employees with the workplace (e.g. training in the Code of Ethical Conduct for new employees, providing an anonymous channel for reporting violations).
- Impact on sustainable development in the real estate industry through the implementation of measures to mitigate and eliminate negative impacts on the environment and people (e.g. planned implementation of an environmental and social assessment system for contractors, development of environmental, health and safety guidelines for main Contractors).
- Impact on supplier reputation and long-term business relationships by ensuring fair payment practices, especially with regard to late payments to small and medium-sized companies.
- Impact on ethical corporate culture and raising awareness among employees through anti-corruption policy training (as part of code of conduct training), training at-risk employees, implementation of policies, procedures and actions regarding corruption and bribery.

In the area of corporate governance, we have not identified any negative impacts, opportunities or risks.

## [G1-1] BUSINESS POLICIES AND CORPORATE CULTURE

The key policies, procedures and regulations in organization management include:

- Code of Good Practice
- Procurement policy
- Tax policies
- Workforce regulations
- Anti-Money Laundering and the Financing of Terrorism Procedure
- Personal data protection policy

The basic and overarching document in the 7R Group is the Code of Good Practice, which sets out the key objectives of ethical behaviour applicable to all employees. This code regulates, among other things, the principles of ethical conduct of employees and suppliers, general principles of confidentiality, anti-corruption and hospitality policy, as well as the rules of contact between employees and suppliers with national and local government authorities and business partners. In addition, it includes a charitable and sponsorship policy, as well as a whistleblowing policy and ethical conduct within the 7R Group.

The Code of Good Practice is made available to employees during the onboarding process and is stored on the Group's intranet. In the case of general contractors, the Code of Good Practice is presented when signing contracts. By 2024, we plan to update the Code to include human rights issues.

We plan to introduce a due diligence process that will enable vetting of our key business partners, including tenants and general contractors in the field of environmental protection, ensuring safe working conditions and human rights.

In connection with the new guidelines for sustainability reporting, we will introduce a policy that will define the processes for sustainability reporting, including the allocation of responsibilities within the company, risk management and controls.

The Board of Directors is responsible for implementing policies and updating them in all areas.

Each employee can anonymously report on incidents against Code of Conduct using the Whistleblowing Channel. This can include incidents such as: criminal activities, abuse of power, failure to perform professional duties by employees or suppliers, corruption and bribery, financial fraud, violations of internal policies, disclosure of confidential information and other unethical behavior, as well as attempts to conceal or cover them up.

As the 7R Group, we are subject to the provisions of Directive (EU) 2019/1937 on the protection of whistleblowers from September 2024. We have implemented the whistleblower protection policy, which came into force on 24 September 2024, in accordance with this Bill.

We ensure full confidentiality and anonymity of whistleblowers, including adequate protection of personal data. We do not tolerate any repressive, discriminatory or other forms of unfair treatment towards whistleblowers, as well as towards people cooperating in internal

In accordance with the policies implemented in the organization, we take measures to promote corporate culture in order to increase employee awareness and engagement. These activities include:

- regular communication from the Board addressed to employees,
- training for all employees to strengthen the corporate culture and ensure compliance within the organization (e.g. training on the Code of Ethical Conduct, GDPR and anti – mobbing),
- active participation of employees in initiatives related to sustainable development,
- introducing policies to standardize processes in the company,
- a series of training courses introducing ESG topics for the entire organization,
- the activities of the "Green Team" – a team of volunteers promoting ESG in the company and across developments,
- promoting ESG activities in external communication.



investigations. We take appropriate disciplinary action against those who commit these actions. The same applies to people who do not comply with the rules for protecting the identity of incident reporters.

Until now, in accordance with the Whistleblowing policy, all submitted incidents are forwarded via the Anonymous Whistleblowing Channel to the Compliance Officer of the 7R Group, who assesses the completeness and legitimacy of the report and then immediately launches an internal investigation. The Compliance Officer has the right to collect information and documents from employees and other available sources. According to the policy, the investigation should be completed within 14 days. From 25 September 2024, whistleblowing reports will be considered in accordance with a new procedure based on the requirements of the Whistleblower Protection Act, which came into force on 25/09/2024.

Personal data of persons reporting breaches and persons accused of committing a breach are protected in accordance with the internal policies of the 7R Group, in particular the Personal Data Protection Policy, as well as in accordance with applicable law.

#### [G1-2] **MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS**

The Code of Good Practice of the 7R Group contains guidelines for cooperation with suppliers. We expect our suppliers to comply with the principles of the Code, avoid unethical activities and behaviour that may raise suspicions of corruption. We do not accept actions that could damage our reputation, the reputation of our employees, investments, business operations or customers. We condemn all forms of corruption, such as bribery, invoking influence or paid influence.

We select suppliers who meet the requirements of the Anti-Corruption Policy and undertake to act in accordance with the Code of Good Practice by signing the contract before starting cooperation.

When selecting suppliers, in addition to criteria such as qualifications, experience, lead times and costs, we pay special attention to the risk of conflict of interest, willingness to cooperate on the part of the supplier, its reputation and possession of anti-corruption and compliance policies, professionalism, transparency of activities, competitive position, common goals, re-

adiness to share knowledge, communication skills, previous experience in active engagement, commitment, location of their business and financial accounts.

We plan to implement surveys for our suppliers, covering issues related to sustainable development, including monitoring and evaluating of their social and environmental performance, social value in the value chain, analyzing the impact of our practices on vulnerable suppliers, as well as setting goals and taking actions in the field of communication and relationship management.

**[G1-6] PAYMENT PRACTICES**

We have a procedure for late payment, in particular for our key suppliers and providers. Payment is made within 30 days of invoice delivery. The Financial Department is responsible for the timely execution of the transfer. In accordance with the applicable regulations, payment issues are reported to the relevant authorities. In 2023, there were no pending court proceedings over 7R delays in payments.



**[G1-1] [G1-3] [G1-4]**

**PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY**

We have an Anti-Corruption Policy that specifically regulates the prevention, detection, investigation and response to allegations and incidents related to corruption or bribery. The main objective of the policy is to define the basic principles of fair and transparent business conduct, which are mandatory for all employees and suppliers, and to provide the 7R Group with effective tools to prevent any corrupt activities.



*The anti-corruption and anti-bribery procedure, which is part of the 7R Code of Good Practice, covers three key areas:*

- *prevention of the risk of corruption in contacts with representatives of state or local government bodies,*
- *preventing the risk of corruption among employees, and*
- *preventing the risk of corruption among suppliers.*

The Policy sets out the rules for avoiding activities that could lead to corruption in relations with representatives of public administration, ensuring transparency and compliance with applicable regulations, and stipulates the principles of engagement with suppliers, defining ethical standards, to exclude corrupt activities at all stages of business activities.

The principles of the policy include the prohibition of the transfer of benefits, bribery of public officials, bribery in exchange for intermediation, incitement to violate the law, manipulation of public tenders, manipulation of information in tenders, and the obligation to make corruption demands. In addition, preventing the risk of corruption among employees includes the prohibition of accepting benefits, abuse of powers, the obligation to report corrupt proposals, the obligation to report gifts, and the reporting of multiple gifts.

The investigators are separate from the management structures involved in the case. The company has a procedure for reporting the results of the investigation to the Management. The Compliance Officer regularly reviews the Gift Register, at least once every 6 months, in order to identify any irregularities, suspicious activities or corruption risks in the operations of the 7R Group.



We take care to raise employee awareness in order to prevent corruption and bribery by providing training on the anti-corruption policy (as part of training on the principles of the Code of Ethical Conduct) for all employees, including those working in the positions most exposed to risks, i.e. departments dealing with purchasing and sales. The Anti-Corruption Policy is published in a publicly available internal system and is also communicated during the onboarding of new employees.

In 2023, there were no convictions or fines for violating anti-corruption laws and anti-bribery laws. The Company did not report on any violations of anti-corruption and anti-bribery procedures and standards.

## Strategic targets – Business conduct

[G1-5]

ESG Strategy Pillar	Target	KPIs	Base year	Target	SDGs	Tasks of the 2030 Agenda
<b>BE RELIABLE BUSINESS PARTNER</b>	We will implement Human Rights policy by 2025.	Implementation of Human Rights Policy ( <i>Implemented/ Not Implemented</i> )	2024	2025	 	<b>12.6</b> Encourage companies, especially large and multinationals, to implement sustainability practices and include sustainability information in their periodic reports. <b>16.3</b> Promote the rule of law at national and international level and ensure equal access to justice for all.
<b>BE RELIABLE BUSINESS PARTNER</b>	We will implement a Sustainable Development Policy containing an ESG reporting procedure.	Implementation of ESG reporting procedures ( <i>Implemented/Not Implemented</i> )	2025	2026		<b>12.6</b> Encourage companies, especially large and multinationals, to implement sustainability practices and include sustainability information in their periodic reports.
<b>BE RELIABLE BUSINESS PARTNER</b>	We will introduce a Grievance Policy to ensure that all employees, including ones in the value chain, can raise complaints through a dedicated mechanism.	% of staff with access to a complaints and suggestions mechanism % of contracts that include information on the complaints and suggestions mechanism	2024	Current		<b>16.10</b> Ensure universal access to information and the protection of fundamental freedoms, in accordance with national legislation and international agreements.
<b>BE RELIABLE BUSINESS PARTNER</b>	We will strive to ensure gender equality in the management.	% of women in key positions in a given year % of men in key positions in a given year	2025	2026		<b>5.5</b> Ensure that women are fully and effectively involved and have equal opportunities to take on leadership roles at all levels of decision-making in political, economic and public life.
<b>BE RELIABLE BUSINESS PARTNER</b>	We will update the Code of Good Practice for contractors and aim to have 100% of general contractors sign the updated version by 2026.	Revision of the Code of Good Practice for general contractors ( <i>Revised/Not Revised</i> ) % of general contractors who have signed the revised Code of Good Practice	2024	2025		<b>13.3</b> Increase education, awareness, and human and institutional capacity for climate change mitigation, adaptation, climate change mitigation, and early warning systems.
<b>BE RELIABLE BUSINESS PARTNER</b>	We will implement an environmental and social assessment system for contractors.	Implementation of a KYC policy ( <i>Implemented/Not Implemented</i> ) % of business partners checked in accordance with the KYC policy	2024	2025		<b>17.16</b> Strengthen North-South and South-South cooperation and regional and international trilateral cooperation on access to science, technology and innovation; step up knowledge sharing on commonly used jargon, including through enhanced coordination of existing mechanisms, in particular at United Nations level, and through a global technology access facility.

<b>BE RELIABLE BUSINESS PARTNER</b>	<p><b>We will promote sustainable business within the company by:</b></p> <p><b>Onboarding:</b> All new employees were introduced to the company's sustainability commitments and Code of Practice.</p> <p><b>Annual training:</b> All employees have completed one year of training on ESG and the Code of Good Practice.</p> <p><b>Daily activities:</b> Promoting ESG activities among employees. Raising employee awareness of sustainability. Promoting actions to reduce pollution caused by employees' commuting.</p>	<p>% of new employees who have undergone ESG training as part of onboarding</p> <p>% of active employees who have undergone annual ESG training</p> <p>Implementation of an internal communication channel dedicated to ESG (<i>Implemented/Not Implemented</i>)</p> <p>Number of initiatives aimed at employees that promote sustainable development</p> <p>% GHG Emission Reduction Scope 3, Category 7 GHG Protocol – Transport of Workers</p>	2022	2026		<p><b>13.3</b> Increase education, awareness, and human and institutional capacity for climate change mitigation, adaptation, climate change mitigation, and early warning systems.</p>
<b>BE RELIABLE BUSINESS PARTNER</b>	<p><b>We will promote sustainable business externally by:</b></p> <p><b>Commitment</b> to Responsible Business Principles by Joining the UN Global Compact.</p> <p><b>Active participation</b> in international and local industry associations working for sustainable development.</p>	<p>Joining the UN Global Compact (<i>Joined/Not Joined</i>)</p> <p>Number of projects, events, conferences, sustainability initiatives carried out in cooperation with industry associations</p>	2024	<i>In progress</i>		<p><b>16.10</b> Ensure universal access to information and the protection of fundamental freedoms, in accordance with national legislation and international agreements.</p>

# 05

## *UE* Taxonomy



## Introduction

In this report, we disclose information for the first time in accordance with Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (the so-called EU Taxonomy). Currently, disclosure under the EU Taxonomy is voluntary for our business and prepared ahead of the disclosure obligation for the parent company 7R S.A. and its subsidiaries.

The alignment assessment of the economic activities has been carried out on the basis of the requirements of the technical screening criteria set out in the following delegated acts:

- Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing technical screening criteria to determine the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or adaptation, and to determine whether those economic activities do no significant harm to any of the other environmental objectives;
- Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards specific public disclosures in respect of those economic activities (Text with EEA relevance);
- Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 establishing additional technical screening criteria to determine the conditions under which certain economic activities qualify as contributing substantially to climate change mitigation or adaptation, and to determine whether those activities do no significant harm to any of the other environmental objectives.

The disclosures have been prepared in accordance with Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by specifying the content and presentation of information on environmentally sustainable economic activities to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU and specifying the methodology for complying with this disclosure obligation (hereinafter: Regulation 2020/2178).

The information presented in this chapter, as in the case of the report, applies to the reporting period from 1.01.2023 to 31.12.2023.



## Identification of Taxonomy-eligible and non-Taxonomy-eligible economic activities

For the first time, we have carried out a process to identify Taxonomy-eligible and non-eligible activities<sup>1</sup>. In order to identify the activities of the parent company 7R S.A. and its subsidiaries, an analysis of the statement of turnover, capital expenditures (CapEx) and operating expenses (OpEx) was carried out in accordance with the financial data presented in the Consolidated Financial Statements of the 7R Group for the period 1.01.2023 – 31.12.2023. Total costs related to turnover, CapEx and OpEx were divided into individual categories depending on the activities of the companies to which they referred. Then, they were reviewed in terms of convergence with the description presented in the „Description of activities” section in the above-mentioned Regulations. When indicating the eligible activities divisions, the European Business Classification System (NACE) was used as an auxiliary measure, which are also presented in the „Description of activities” section of the above-mentioned Regulations.

On the basis of the process described above, the following activities of the 7R Group eligible for the Taxonomy were identified:

- Construction of new buildings,
- Acquisition and ownership of buildings,
- Transport by motorcycles, passenger cars and light commercial vehicles,
- Road freight transport services.

Other business activities of the 7R Group are currently not eligible for Taxonomy.

## Taxonomy-aligned economic activity assessment

In order to identify Taxonomy-aligned economic activities<sup>2</sup>, we assessed the fulfilment of the technical screening criteria for a substantial contribution and the criteria for doing no significant environmental harm in relation to the other environmental objectives. We also conducted an analysis of minimum safeguards<sup>3</sup>.

1 ‚Taxonomy-eligible economic activities’ means an economic activity as described in the delegated acts adopted pursuant to Articles 10(3), 11(3), 12(2), 13(2), 14(2) and 15(2) of Regulation (EU) 2020/852, regardless of whether such economic activity fulfils any or all of the technical screening criteria set out in those delegated acts.

‚Taxonomy-eligible economic activities’ means any economic activity that is not described in the delegated acts adopted pursuant to Article 10(3), Article 11(3), Article 12(2), Article 13(2), Article 14(2) and Article 15(2) of Regulation (EU) 2020/852.

The above definitions are in line with Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by specifying the content and presentation of information on environmentally sustainable economic activities to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU and specifying the methodology for complying with this disclosure obligation.

2 ‚Taxonomy-aligned economic activities’ means economic activities that meet the requirements set out in Article 3 of Regulation (EU) 2020/852, as defined in Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by specifying the content and presentation of the information to be disclosed by undertakings on environmentally sustainable economic activities subject to Article 19a or 29a of Directive 2013/34/EU and the determination of the methodology for complying with that disclosure obligation.

3 The minimum safeguards referred to in Article 3(c) are the procedures followed by an undertaking engaged in an economic activity to ensure compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions set out in the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work and the principles and rights set out in the International Labour Organisation the Charter of Human Rights, in accordance with Article 18 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.

## TECHNICAL ELIGIBILITY CRITERIA

We analysed the technical screening criteria for material contribution and the criteria for doing no significant harm to other environmental objectives in order to confirm whether the economic activity in 2023 was in line with the Taxonomy. Based on the documentation we currently have, we could not determine whether the economic activity eligible for the Taxonomy is compliant with the Taxonomy. This applies to the following activities: 7.1 Construction of new buildings and 7.7 Acquisition and ownership of buildings 6.5 Transport by motorcycles, passenger cars and light commercial vehicles and 6.6 Road transport services for goods. The conformity assessment will be carried out again for the next reporting year.

## MINIMUM WARRANTIES

The assessment of whether the business activity complies with the minimum guarantees has been carried out on the basis of internally applied procedures and policies in terms of compliance with: the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the Declaration of the International Labour Organization and the International Bill of Human Rights. The assessment of the organization's compliance with the minimum guarantees was also carried out on the basis of a study prepared as part of the work of the Working Group on Minimum Guarantees by the Sustainable Investment Forum Poland (POLSIF)<sup>1</sup>.

The internal procedures and policies currently in place ensure partial compliance with the minimum guarantees. The Company operates in accordance with applicable regulations. We currently do not have a due diligence system in place. We plan activities in this area to ensure compliance with minimum guarantees and compliance with applicable regulations in the coming years.

In the reporting year, no final court rulings were issued regarding violations that would be contrary to the principles of the above-mentioned guidelines. There were also no reports in the registers of the OECD National Contact Point (OECD NCP) and the Business and Human Rights Resource Centre (BHRR) or other legal entities.

More information on due diligence is provided in the other chapters of this report.

## Presentation of key performance indicators

This chapter presents the tables of key indicators according to the template for the purpose of disclosing key performance indicators of non-financial undertakings in accordance with Annex II of Regulation 2020/2178.

## ACCOUNTING POLICIES

The basis for calculating the key performance indicators for turnover (turnover KPI), capital expenditure (CapEx KPI) and operating expenditure (OpEx KPI) was the Consolidated Financial Statements of the 7R S.A. Group for the period 1.01.2024 – 31.12.2024 (hereinafter: financial statements for 2023) in accordance with generally accepted accounting principles. In accordance with the methodology for preparing financial statements, appropriate consolidation exclusions have been taken into account. In order to eliminate the risk of double counting, financial costs were not taken into account more than once. The parent company 7R S.A. supervised the process of preparing key indicators. Further information on the approach used to calculate the KPIs and contextual information is provided below.

<sup>1</sup> Sustainable Investment Forum Poland (POLSIF) (2024). Minimum Warranties. The study was prepared as part of the work of the Working Group. Source: Scope of the Working Party on Minimum Guarantees (website-files.com)

## TURNOVER KPIs

The turnover KPI was developed by dividing net revenues from the sale of products and services related to Taxonomy-qualified, non-Taxonomy-eligible and Taxonomy-aligned economic activities with respect to revenues presented in the 2023 financial statements. The total sales revenues presented in the above-mentioned report were adopted as the denominator of the ratio.

On the basis of the analysis of total revenues, the main activities eligible for the Taxonomy were identified, including 7.1 Construction of new buildings, 7.7 Acquisition and ownership of buildings, Activity 6.6 Road transport of goods qualifying for the Taxonomy, which concerns the activities of 7R Solution Sp. z o.o. providing transport services for goods with the use of trucks. In 2023, according to the financial statements for 2023, the Group lost independent control over the company and no longer consolidates it using the full method.

## CapEx KPI

The CapEx KPI was prepared by dividing the costs associated with CapEx with Taxonomy-qualified, non-Taxonomy-eligible and Taxonomy-aligned economic activities with respect to the total costs associated with capital expenditures presented in the 2023 financial statements. The total costs related to investment expenditures presented in the above-mentioned report were adopted as the denominator of the indicator.

In order to calculate the CapEx KPI, capital expenditures including expenditures on real estate investments, including costs related to the construction of warehouses and land purchase costs, as well as expenditures on fixed assets, were taken into account.

Capital expenditure related to the purchase of land was not included as a Taxonomy-eligible activity, based on a review of convergence with the description presented in the „Description of activities” section and the auxiliary use of NACE codes in the above-mentioned Regulations.

## OpEx KPI

The OpEx KPI was developed by breaking down the costs associated with Taxonomy-qualified, non-Taxonomy-eligible and Taxonomy-aligned economic activities with respect to the total costs related to OpEx as presented in the 2023 financial statements. The total costs related to operating expenditure presented in the above-mentioned Report were adopted as the denominator of the indicator.

In order to calculate the OpEx KPI, the Group's operating expenses were taken into account, including depreciation of fixed assets, amortization of intangible assets (including costs of authorizations to use the implemented software and systems) and costs related to resources and services necessary for the Group's operation and provision of products and services (including, m.in others, costs of repairs, maintenance, taxes).

Operational expenditure related to the purchase of land was not included as a Taxonomy-eligible activity, based on a review of convergence with the description provided in the „Description of activities” section and the auxiliary use of NACE codes in the above-mentioned Regulations.

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This report omits the template tables contained in Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards public disclosure of details in relation to those economic activities, as they do not relate to economic activities carried out by Group 7R. A summary of nuclear and natural gas activities is provided in Appendix 3 of this report.



## TURNOVER KPI

Economic activities	Code(s)	Absolute turnover	Proportion of turnover	SUBSTANTIAL CONTRIBUTION							DOES NOT SIGNIFICANTLY HARM (DNSH)							Minimum safeguards	Taxonomy-aligned proportion of turnover, year N	Taxonomy-aligned proportion of turnover, year N-1	Category (enabling activity)	Category (transitional activity) (21)
				Climate change mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystem							
				%	%	%	%	%	%	T/N	T/N	T/N	T/N	T/N	T/N	T/N	T/N					
<b>A. Taxonomy-eligible activities</b>																						
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																						
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0,00	0%	0%	0%	0%	0%	0%	0%	-	-	-	-	-	-	-	0%	-	0%	0%		
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																						
Acquisition and ownership of buildings	CCM 7.7	53 338 355,58	16,85%																			
Construction of new buildings	CCM 7.1	215 452 283,03	68,07%																			
Road freight transport services	CCM 6.6	15 217 058,48	4,81%																			
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		284 007 697,09	89,7%														-	-				
Total (A.1 + A.2)		284 007 697,09	89,73%														%	-				
<b>B. Taxonomy-non-eligible activities</b>																						
Turnover of Taxonomy non-eligible activities (B)		232,754,202,70	10,27%																			
Total (A + B)		316 526 673,70	100%																			

### EXPLANATIONS OF THE TABLE:

T – Yes, Taxonomy-eligible and Taxonomy-aligned activity for the relevant environmental objective

N – No, Taxonomy-eligible but not Taxonomy-aligned activity for the relevant environmental objective,

N/EL – Not eligible, Taxonomy non-eligible activity for the relevant environmental objective,

EL – Taxonomy-eligible activity for the relevant objective.

### Abbreviations for relevant objectives for which an economic activity is eligible to make a substantial contribution:

climate change mitigation (CCM), climate change adaptation (CCA), water and marine resources (WTR), circular economy (CE), pollution prevention and control (PPC), biodiversity and ecosystems (BIO) – are not labelled because no Taxonomy-eligible activities have been assessed as Taxonomy-aligned<sup>1</sup>.

<sup>1</sup> The information presented below the table is in accordance with Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing technical screening criteria to determine the conditions under which an economic activity qualifies as making a substantial contribution to the sustainable use and protection of water and marine resources, to the transition to a circular economy, in the prevention and control of pollution or in the protection and restoration of biodiversity and ecosystems, and in determining whether that economic activity does significant harm to any of the other environmental objectives, and amending Commission Delegated Regulation (EU) 2021/2178 as regards the public disclosure of specific information in relation to those economic activities

## CapEx KPI

Economic activities	Code(s)	Absolute CapEx	Proportion of CapEx	SUBSTANTIAL CONTRIBUTION						DOES NOT SIGNIFICANTLY HARM (DNSH)						Minimum safeguards	Taxonomy-aligned proportion of turnover, year N	Taxonomy-aligned proportion of turnover, year N-1	Category (enabling activity)	Category (transitional activity)
				Climate change mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystem					
				%	%	%	%	%	%	T/N	T/N	T/N	T/N	T/N	T/N					
<b>A. Taxonomy-eligible activities</b>																				
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																				
CapEx of environmentally sustainable activities (A.1)		0,00	0%	0%	0%	0%	0%	0%	0%	-	-	-	-	-	-	-	0%	-	0%	0%
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																				
Acquisition and ownership of buildings	CCM 7.7	54 680,91	0,01%																	
Construction of new buildings	CCM 7.1	513 085 298,35	77,02%																	
Transport by motorcycles, passenger cars and light commercial vehicles	CCM 6.5	194 104,28	0,03%																	
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		513 334 083,54	77,06%														-	-		
<b>Total (A.1 + A.2)</b>		<b>513 334 083,54</b>	<b>77,06%</b>														<b>%</b>	<b>-</b>		
<b>B. Taxonomy-non-eligible activities</b>																				
Turnover from non-Taxonomy-eligible activities (B)		152 829 962,04	22,94%																	
<b>Total (A + B)</b>		<b>666 164 045,58</b>	<b>100%</b>																	

### EXPLANATIONS OF THE TABLE:

T – Yes, Taxonomy-eligible and Taxonomy-aligned activity for the relevant environmental objective

N – No, Taxonomy-eligible but not Taxonomy-aligned activity for the relevant environmental objective,

N/EL – Not eligible, Taxonomy non-eligible activity for the relevant environmental objective,

EL – Taxonomy-eligible activity for the relevant objective.

### Abbreviations for relevant objectives for which an economic activity is eligible to make a substantial contribution:

climate change mitigation (CCM), climate change adaptation (CCA), water and marine resources (WTR), circular economy (CE), pollution prevention and control (PPC), biodiversity and ecosystems (BIO) – are not labelled because no Taxonomy-eligible activities have been assessed as Taxonomy-aligned.

## OpEx KPI

Economic activities	Code(s)	Proportion of OpEx	Proportion of CapEx	SUBSTANTIAL CONTRIBUTION							DOES NOT SIGNIFICANTLY HARM (DNSH)							Taxonomy-aligned proportion of turnover, year N	Taxonomy-aligned proportion of turnover, year N-1	Category (enabling activity)	Category (transitional activity)
				Climate change mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystem	Minimum safeguards					
				%	%	%	%	%	%	T/N	T/N	T/N	T/N	T/N	T/N	T/N	%				
<b>A. Taxonomy-eligible activities</b>																					
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																					
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0,00	0%	0%	0%	0%	0%	0%	0%	-	-	-	-	-	-	-	0%	-	0%	0%	
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																					
Acquisition and ownership of buildings	CCM 7.7	47 255 852,38	13,71%																		
Construction of new buildings	CCM 7.1	44 666 639,73	12,96%																		
Road freight transport services	CCM 6.6	7 666 029,54	2,22%																		
<b>OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b>		<b>100 182 654,09</b>	<b>29,06%</b>														-	-			
<b>Total (A.1 + A.2)</b>		<b>100 182 654,09</b>	<b>29,06%</b>														%	-			
<b>B. Taxonomy-non-eligible activities</b>																					
Turnover from non-Taxonomy-eligible activities (B)		244 548 526,38	70,94%																		
<b>Total (A + B)</b>		<b>344 731 180,47</b>	<b>100%</b>																		

### EXPLANATIONS OF THE TABLE:

T – Yes, Taxonomy-eligible and Taxonomy-aligned activity for the relevant environmental objective

N – No, Taxonomy-eligible but not Taxonomy-aligned activity for the relevant environmental objective,

N/EL – Not eligible, Taxonomy non-eligible activity for the relevant environmental objective,

EL – Taxonomy-eligible activity for the relevant objective.

### Abbreviations for relevant objectives for which an economic activity is eligible to make a substantial contribution:

climate change mitigation (CCM), climate change adaptation (CCA), water and marine resources (WTR), circular economy (CE), pollution prevention and control (PPC), biodiversity and ecosystems (BIO) – are not labelled because no Taxonomy-eligible activities have been assessed as Taxonomy-aligned.

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*Appendices*



# Appendix 1

## List of disclosure requirements presented in this report

		Pages in the report
<b>ESRS 2</b>	<b>General Disclosures</b>	
	BP-1 General basis for preparation of sustainability statements	7
	BP-2 Disclosures in relation to specific circumstances	7
	GOV-1 The role of administrative, management and supervisory bodies	8, 12
	GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	12
	GOV-3 Integration of sustainability-related performance in incentive schemes	15
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	SBM-1 Strategy, business model and value chain	16, 21, 24
	SBM-2 Interests and Views of Stakeholders	16, 22, 67, 80
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	IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	30, 74, 77, 80
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<b>2. ENVIRONMENTAL ISSUES</b>		
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	E1-1 Transition plan for climate change mitigation	35
	SBM-3 Material impacts, risks and opportunities and their interaction with the strategy and the business model	36
	IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities	36
	E1-2 Policies related to climate change mitigation and adaptation	35
	E1-3 Actions and resources in relation to climate change policies	36
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	E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	46, 48
<b>ESRS E4</b>	<b>Biodiversity and ecosystems</b>	
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	IRO-1 Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	50, 64
	E4-1 Transition plan and consideration of biodiversity and ecosystems in strategy and business model	52
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<b>ESRS E5</b>	<b>Resource use and circular economy</b>	
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	S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns	67
	S1-4 Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	64
	S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	64
	S1-6 Characteristics of the undertaking's employees	69
	S1-7 Characteristics of non-employee workers in the undertaking's own workforce	<i>Data on non-employees will be presented in subsequent reporting years.</i>
	S1-9 Diversity metrics	71
	S1-10 Adequate wages	<i>The salary data was not disclosed due to the confidentiality of the data.</i>
	S1-11 Social protection	71
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	S2-3 Processes to remediate negative impacts and channels for value chain workers to raise concerns	75
	S2-4 Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action	75
	S2-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	77
<b>ESRS S3</b>	<b>Affected communities</b>	
	SBM-3 Material impacts, risks and opportunities and their interaction s with the strategy and the business model	77
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	S3-2 Processes for engaging with affected 209 communities about impacts	78
	S3-3 Processes to remediate negative impacts and channels for affected communities to raise concerns	78
	S3-4 Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	78
	S3-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	79
<b>ESRS S4</b>	<b>Consumers and end-users</b>	
	SBM-3 Material impacts, risks and opportunities and their interaction with the strategy and the business model	80
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<b>4. CORPORATE GOVERNANCE</b>		
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## Appendix 2

### List of data points included in horizontal and thematic standards that result from other EU legislation

This information is an integral part of ESRS 2. The table below shows the data points contained in ESRS 2 and the topical ESRS, which have their origin in other EU legislation.

Disclosure Requirement and related datapoint	SFDR reference (1)	Pillar 3 reference (2)	Benchmark Regulation reference(3)	EU Climate Law reference (4)	Page in the report
<b>ESRS 2 GOV-1</b> Board's gender diversity paragraph 21 (d)	Indicator 13 in Table 1 of Annex I		Annex II to Commission Delegated Regulation (EU) 2020/1816 (5)		10
<b>ESRS 2 GOV-1</b> Percentage of board members who are independent paragraph 21 (e)			Annex II to Delegated Regulation (EU) 2020/1816		11
<b>ESRS 2 GOV-4</b> Statement on due diligence paragraph 30	Indicator 10 in Table 3 of Annex I				15
<b>ESRS 2 SBM-1</b> Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicator 4 in Table 1 of Annex I	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (6), Table 1: Qualitative information on environmental risks and Table 2: Qualitative information on social risks	Annex II to Delegated Regulation (EU) 2020/1816		
<b>ESRS 2 SBM-1</b> Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator 9 in Table 2 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816		<i>Not applicable</i>
<b>ESRS 2 SBM-1</b> Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator 14 in Table 1 of Annex I		Article 12(1) of Delegated Regulation (EU) 2020/1818 (7), Annex II to Delegated Regulation (EU) 2020/1816		<i>Not applicable</i>
<b>ESRS 2 SBM-1</b> Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Article 12(1) of Delegated Regulation (EU) 2020/1818, Annex II to Delegated Regulation (EU) 2020/1816		<i>Not applicable</i>
<b>ESRS E1-1</b> Transition plan to reach climate neutrality by 2050 paragraph 14				Article 2(1) of Regulation (EU) 2021/1119	35

<b>ESRS E1-1</b> Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book – Transition risks related to climate change: credit quality of exposures by sector, issuance and residual maturity	Article 12(1)(d) to (g) and Article 12(2) of Delegated Regulation (EU) 2020/1818		
<b>ESRS E1-4</b> GHG emission reduction targets paragraph 34	Indicator 4 in Table 2 of Annex I	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 3: Banking book – Transition risks related to climate change: adjustment measures	Article 6 of Delegated Regulation (EU) 2020/1818		41
<b>ESRS E1-5</b> Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator 5 in Table 1 and indicator 5 in Table 2 of Annex I				45
<b>ESRS E1-5</b> Energy consumption and mix paragraph 37	Indicator 5 in Table 1 of Annex I				45
<b>ESRS E1-5</b> Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator 6 in Table 1 of Annex I				46
<b>ESRS E1-6</b> Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators 1 and 2 in Table 1 of Annex I	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 1: Banking book – Transition risk related to climate change: credit quality of exposures by sector, issuance and residual maturity	Articles 5(1), 6 and 8(1) of Delegated Regulation (EU) 2020/1818		48
<b>ESRS E1-6</b> Gross GHG emissions intensity paragraphs 53 to 55	Indicator 3 in Table 1 of Annex I	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 3: Banking book – Transition risks related to climate change: adjustment measures	Article 8(1) of Delegated Regulation (EU) 2020/1818		49



<b>ESRS E1-7</b> GHG removals and carbon credits paragraph 56				Article 2(1) of Regulation (EU) 2021/1119	Not applicable
<b>ESRS E1-9</b> Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Annex II to Delegated Regulation (EU) 2020/1818, Annex II to Delegated Regulation (EU) 2020/1816		Not applicable
<b>ESRS E1-9</b> Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) <b>ESRS E1-9</b> Location of significant assets at material physical risk paragraph 66 (c).		Article 449a of Regulation (EU) No 575/2013; points 46 and 47 of Commission Implementing Regulation (EU) 2022/2453; template 5: Banking book – Physical risks related to climate change: exposures subject to			Not applicable
<b>ESRS E1-9</b> Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		Article 449a of Regulation (EU) No 575/2013; paragraph 34 of Regulation Executive Commission (EU) 2022/2453; Formula 2: Bank Portfolio – Risk of passing related to climate change: secured loans Property–Safety energy efficiency			Not applicable
<b>ESRS E1-9</b> Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Annex II to Delegated Regulation (EU) 2020/1818		Not applicable
<b>ESRS E4-2</b> Sustainable land / agriculture practices or policies paragraph 24 (b))	Indicator No. 11 Table 2 of Annex I				Currently, 7R does not have a policy to protect biodiversity and ecosystems. The policy will be developed and formally adopted by 2026 and will take into account the significant impacts on biodiversity resulting from the activities carried out.
<b>ESRS E4-2</b> Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator No. 12 Table 2 of Annex I				Not applicable

<b>ESRS E4-2</b> Policies to address deforestation paragraph 24 (d)	Indicator No. 15 Table 2 of Annex I				Currently, 7R does not have a policy to protect biodiversity and ecosystems. The policy will be developed and formally adopted by 2026 and will take into account the significant impacts on biodiversity resulting from the activities carried out.
<b>ESRS E5-5</b> Non-recycled waste paragraph 37 (d)	Indicator No. 13 Table 2 of Annex I				61
<b>ESRS E5-5</b> Hazardous waste and radioactive waste paragraph 39	Indicator No. 9 Table 1 of Annex I				Generation of radioactive waste - not applicable, because the Company's activity is not related to the generation of this type of waste.  There is no data on hazardous waste on the basis of KPO (waste transfer cards).
<b>ESRS 2 SBM-3-S1</b> Risk of incidents of forced labour paragraph 14 (f)	Indicator No. 13 Table 3 of Annex I				Not applicable
<b>ESRS 2 SBM-3-S1</b> Risk of incidents of child labour paragraph 14 (g)	Indicator No. 12 Table 3 of Annex I				Not applicable
<b>ESRS S1-1</b> Human rights policy commitments paragraph 20	Indicator No. 9 Table 3 and the indicator No. 11 in Table 1 Annex I				66
<b>ESRS S1-1</b> Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Annex II to Delegated Regulation (EU) 2020/1816		66
<b>ESRS S1-1</b> Processes and measures for preventing trafficking in human beings paragraph 22	Indicator No. 11 Table 3 of Annex I				Not applicable
<b>ESRS S1-1</b> Workplace accident prevention policy or management system paragraph 23	Indicator No. 1 Table 3 of Annex I				66

<b>ESRS S1-3</b> Grievance/complaints handling mechanisms paragraph 32 (c)	Indicator No. 5 Table 3 of Annex I				67
<b>ESRS S1-14</b> Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator No. 2 Table 3 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816		73
<b>ESRS S1-14</b> Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator No. 3 Table 3 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816		73
<b>ESRS S1-16</b> Unadjusted gender pay gap paragraph 97 (a)	Indicator No. 12 Table 1 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816		<i>Data on the gender pay gap are not presented in this Report. The company will start reporting indicators from 2025.</i>
<b>ESRS S1-16</b> Excessive CEO pay ratio paragraph 97 (b)	Indicator No. 8 Table 3 of Annex I				<i>Data on the ratio of the annual total salary of the highest earner to the median annual total salary of all employees is not presented in this Report. The company will start reporting indicators from 2025.</i>
<b>ESRS S1-17</b> Incidents of discrimination paragraph 103 (a)	Indicator No. 7 Table 3 of Annex I				
<b>ESRS S1-17</b> Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator No. 10 Table 1 and the No. 14 in Table 3 Annex I		Annex II to Delegated Regulation (EU) 2020/1816, Art. 12 paragraph 1 of Delegated Regulation (EU) (EU) 2020/1818		73
<b>ESRS 2 SBM-3-S2</b> Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators No. 12 and No. 13 in Table 3 Annex I				74
<b>ESRS S2-1</b> Human rights policy commitments paragraph 17	Indicator No. 9 Table 3 and the indicator No. 11 in Table 1 Annex I				74
<b>ESRS S2-1</b> Policies related to value chain workers paragraph 18	Indicator 11 and 4 in Table 3 of Annex 1				74

<b>ESRS S2-1</b> Non- respect of UNGPs on Business and Human Rights principles and OECD guidelines	Indicator No. 10 Table 1 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816, Art. 12 paragraph 1 of Delegated Regulation (EU) (EU) 2020/1818		74
<b>ESRS S2-1</b> Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Annex II to Delegated Regulation (EU) 2020/1816		75
<b>ESRS S2-4</b> Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator No. 9 Table 3 of Annex I and the indicator No. 11 in Table 1 Annex I				75
<b>ESRS S3-1</b> Human rights policy commitments paragraph 16	Indicator No. 9 Table 3 of Annex I and the indicator No. 11 in Table 1 Annex I				77
<b>ESRS S3-1</b> Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator No. 10 Table 1 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816, Art. 12 paragraph 1 of Delegated Regulation (EU) (EU) 2020/1818		77
<b>ESRS S3-4</b> Human rights issues and incidents paragraph 36	Indicator No. 14 Table 3 of Annex I				78
<b>ESRS S4-1</b> Policies related to consumers and end-users paragraph 16	Indicator No. 9 Table 3 and the indicator No. 11 in Table 1 Annex I				81
<b>ESRS S4-1</b> Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator No. 10 Table 1 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816, Art. 12 paragraph 1 of Delegated Regulation (EU) (EU) 2020/1818		81
<b>ESRS S4-4</b> Human rights issues and incidents paragraph 35	Indicator No. 14 Table 3 of Annex I				81
<b>ESRS G1-1</b> United Nations Convention against Corruption Paragraph 10(b)	Indicator No. 15 Table 3 of Annex I				85

<b>ESRS G1-1</b> Protection of whistleblowers paragraph 10 (d)	Indicator No. 6 Table 3 of Annex I				87
<b>ESRS G1-4</b> Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicator No. 17 Table 3 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816		88
<b>ESRS G1-4</b> Standards of anticorruption and anti-bribery paragraph 24 (b)	Indicator No. 16 Table 3 of Annex I				88


- (1) Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Regulation on sustainability-related disclosures in the financial services sector) (OJ L 2019, p. L 317, 9.12.2019, p. 1).
- (2) Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (the Capital Requirements Regulation, 'CRR') (OJ L 2013, p. L 176, 27.6.2013, p. 1).
- (3) Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014. L 171, 29.6.2016, p. 1).
- (4) Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 (European Climate Law) (OJ L 2021, p. L 243, 9.7.2021, p. 1).
- (5) Commission Delegated Regulation (EU) 2020/1816 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards clarifying in the benchmark statement how environmental, social and governance (ESG) factors are reflected in each benchmark provided and published (OJ L 2020, p. L 406, 3.12.2020, p. 1).
- (6) Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 amending the implementing technical standards laid down in Implementing Regulation (EU) 2021/637 as regards disclosure of information on environmental, social and governance risks. L 324, 19.12.2022, p. 1).
- (7) Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council with regard to minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks (OJ L 1999, p. L 406, 3.12.2020, p. 17).

## Appendix 3

### Nuclear and fossil gas related activities

NUCLEAR ENERGY RELATED ACTIVITIES		
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
FOSSIL GAS RELATED ACTIVITIES		
1.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
2.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
3.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

The table is in accordance with Template 1 Nuclear and natural gas activities, as set out in Annex 12 of Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards the public disclosure of specific information in relation to those economic activities.



If you have any questions about the information contained in this sustainability statement, please contact:

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