

## **\*\*\* Sustainability Policy \*\*\***

### **§ 1 Preliminary note**

For the Sirius Group (the Group), integrity, social, environmental and economic responsibility are fundamental behaviours that must be preserved and protected. These values are deeply embedded in the management of the company and ensure the highest standards of business conduct.

Our actions and policies reflect not only the interests and values of the Sirius Group, but more importantly the interests of all stakeholders, including investors, tenants and suppliers, managers, employees and our local communities.

The following policy applies comprehensively to all members of the Sirius Group, including all Dutch, UK, Cypriot as well as German subsidiaries, specifically: Sirius Real Estate Ltd, Sirius Facilities GmbH, BizSpace Ltd, BizSpace II Ltd, M25 Business Centres Ltd, Curris Facilities & Utilities Management GmbH, LB2 Catering and Services GmbH, DDS Conferencing and Catering GmbH and SFG Nova Construction and Services GmbH.

### **§ 2 Governance**

Corporate governance is embedded in compliance management, which ensures that all rules of economic and human cooperation are respected and protected. Compliance management is characterised by the fact that particularly sensitive and noteworthy topics are laid down in corporate guidelines and these guidelines are brought to the attention of both employees and business partners and compliance with them is demanded. The employees of the group are trained and tested separately within the framework of compliance management.

The Group ensures that compliance management is always adapted and updated to new circumstances.

#### **Ethics and transparency**

The Group is committed to acting in a legal, open, ethical and trustworthy manner while fulfilling its regulatory obligations. The Group always deals with its business partners in an honest and respectful manner.

The importance of adhering to ethics and transparency is reflected in the Whistleblowing Policy, the Anti-Bribery and Corruption Statement and the Modern Slavery Statement. In addition, the Supplier Code of Conduct is an important basis for business, as the Group expects ethical and righteous behaviour from its business partners.

The Group attaches great importance to compliance with its contracts, as this demonstrates the Group's loyalty to its contractual partners. The Group ensures that the terms and conditions agreed in the contracts respect and uphold the applicable law and provide for a fair and balanced contractual relationship that benefits both parties in the best possible way.

The Group has set out the rules for reporting unethical or improper conduct in its Whistleblowing Policy. Reports can be made by employees or by the Group's business partners, among



others. Whistleblowers do not have to fear professional or private reprisals, but enjoy full protection.

## Governance

The Board guides the Group through the execution of its duties and responsibilities, including agreeing and monitoring the strategic direction of the company.

The Board is responsible for overseeing the Group, the accountability of the Executive Directors and senior management in a number of areas including financial performance, culture and risk control, legal and regulatory obligations, the ESG programme and the protection of shareholders' interests. The Board is required to comply with the regulations of the the Financial Conduct Authority, the Board of the Johannesburg Stock Exchange and the respective governance codes imposed by these authorities, as well as the accounting requirements for companies listed on the London and South African premium/main exchanges.

## § 3 Social

The Group's core social values are characterised above all by the fact that openness is expected, that new ideas are always viewed with curiosity and that all opinions are listened to with respect. The Group values honest feedback and offers space for discussion and exchange.

### Employees and people

The Group has a responsibility to protect the health of its employees. The Group provides various health, fitness and wellbeing measures that take into account the needs of the employees and can be adapted if necessary. To address employee health protection, the Group has adopted a comprehensive Health & Wellbeing Policy, which includes various health measures that focus not only on the physical but also on the mental health of employees.

The employees are the foundation of the Group. They are to be fully supported in their careers. They are provided with training and development opportunities that are best suited to the employee's job and individual ambition and cover topics such as the real estate industry, safety in the workplace, diversity and integration and necessary specialist knowledge. In addition to internal training opportunities such as the Sirius Academy, external training opportunities are also available.

### Integration and equal treatment

Openness and inclusion are core values of the Group. The Group is committed to equal employment opportunities and protecting the rights of all employees. As part of the Group, Sirius Facilities GmbH, based in Germany, is a member of the "Diversity Charter". Employees are specifically trained and screened on topics such as anti-discrimination and inclusion in relation to the importance and context of diversity in the work environment.

The group refers to its anti-discrimination and diversity policy.



## Social commitment

Projects are implemented to support community and sporting events, as well as sponsoring an international exchange programme. Employees are encouraged to participate in a variety of different events and initiatives.

## § 4 Environment

For many years, science has been highlighting the risk to the global climate caused by massive CO<sub>2</sub> emissions and its potential effects on the environment. These include the increasing risk of floods, droughts, heat waves other extreme weather events with potential severe consequences on entire habitats.

This presents us, society and the economy with significant challenges that require positive, sustainable, results-oriented responses based on long-term thinking. We have, and will continue, to consider environmental aspects in our daily business and integrate them into our corporate culture and actions.

According to the UN Environment Programme, buildings and their construction are responsible for 39% of global carbon emissions. This means that the real estate sector is in a unique position to play a fundamental role in combating climate change. As one of the largest property owners in Germany, we are aware of our responsibility to contribute to global efforts to combat climate change and to minimise the impact of our activities on the environment. In doing so, we focus on sustainable action and on reducing CO<sub>2</sub> emissions across our portfolio. We are committed to playing our part in tackling climate change and protecting the environment by reducing our own carbon footprint, avoiding pollution where possible and identifying and preventing significant environmental risks. Our actions to date have resulted in our company's carbon dioxide emissions being below the German average as over 85% of energy is already generated from renewable sources. However, we recognise that we have more to do.

When acquiring and upgrading older light industrial sites, we strive to improve the energy efficiency of the buildings and recycle and upgrade unused space. This is done using best practice in health and safety, fire safety and recycling to ensure that all legal obligations are met and an improved environment is created for tenants and employees on site, while meeting sustainability and environmental requirements. Our sustainable strategy of maintaining and refurbishing existing buildings helps to minimise urban sprawl and protect undeveloped land. By recycling existing properties, we conserve resources and minimise the amount of materials and energy needed to build new properties. When purchasing materials, care is taken to ensure that they are sustainable and conserve resources.

When acquiring properties, an extensive environmental due diligence is carried out by the acquisition team and any required environmental remediation is implemented according to applicable standards.

To tackle climate change and drive effective environmental protection, it is not enough for us to work alone. We want to raise awareness of environmental issues and therefore work closely with a wide range of partners, including local and national government, tenants and the communities in which we operate, to achieve effective environmental protection. Each and every



one of them shares with us a responsibility to act in a responsible and environmentally conscious manner.

We believe that the interests of business and the environment are aligned when it comes to climate change. A sustainable real estate sector delivers value for clients and shareholders and helps protect the planet.

### **§ 5 Review of the policy**

The committee will review the policy annually, which will include an evaluation of the effectiveness of the policy. The Committee will also discuss and recommend to the Board any revisions that may be required.

Approved by: The Social and Ethics Committee

Last updated March 2022

