

Non-financial statement

General information

ESRS 2 General disclosures

Basis for preparation

BP-1 – General basis for preparation of sustainability statements

(BP-1_01, BP-1_02)

Scope of companies and portfolio

This non-financial statement has been prepared on a consolidated basis. It covers S IMMO AG and all consolidated subsidiaries (see section 2.2.4. of the consolidated financial statements of the annual report 2024). Equity accounted investees are considered as part of the company's value chain. The portfolio of the company comprised 157 standing investment properties as of 31 December 2024.

Nonfinancial data covers the whole Group's building portfolio (in Austria, Germany, the Czech Republic, Romania, Hungary, Slovakia and Croatia) – i.e. data for assets operated by the Group and rented to third parties.

(BP-1_04)

The non-financial statement covers the impacts and risks and their management that relates also to the Group's upstream and downstream value chain as described below. S IMMO's upstream and downstream value chain was considered in the process of identifying and assessing material impacts, risks and opportunities in the course of the double materiality assessment. A detailed description of the value chain considered can be found in section SBM-1 of this chapter.

BP-2 – Disclosures in relation to specific circumstances

(BP-2_01)

The definition of time horizons in ESRS 1, section 6.4 was used for the preparation of this statement.

(BP-2_03, BP-2_04, BP-2_05, BP-2_06, BP-2_07, BP-2_08, BP-2_09)

S IMMO strives for maximum accuracy. Therefore, in most cases, actual data including the value chain data such as tenant's energy and water consumptions are used for disclosed metrics. Estimates are employed solely in instances where actual data is not available by the end of the data collection period. Details can be found in the metrics section of E1-5, E1-6, E3 and E5.

(BP-2_10, BP-2_11, BR-2_12)

This sustainability statement was prepared in line with the European Sustainability Reporting Standards (ESRS) for the first time. Based on legislation in Austria at the time of disclosure, it is considered to be voluntarily. This report was reviewed with limited assurance by EY Austria.

At the same time, this fulfils the obligation to prepare a non-financial statement in the management report (Section 267a of the Austrian Commercial Code (UGB)) and, in accordance with EU Directive 2014/95/EU on the disclosure of non-financial information (NFI Directive) and its implementation in the Austrian Sustainability and Diversity Improvement Act (NaDiVeG), the required information for the 'Non-financial Statement' is covered and prepared as part of the Group Management Report in the Annual Report 2024 and published.

Changes in reporting compared to previous reporting period are disclosed in the relevant sections of this statement.

Governance

GOV-1 – The role of the administrative, management and supervisory bodies

(GOV-1_01-03, GOV-1_04)

As of 31 December 2024, the Management Board consists of Radka Doehring, Pavel Mechura and Vit Urbanec. The Supervisory Board consists of Martin Matula, Vladislav Jirka, Matej Csenky and Andreas Feuerstein (Works Council representative).

The dual management structure of S IMMO AG consists of a Management Board and a Supervisory Board. These corporate bodies are strictly separated, in both their composition and functions, and can therefore independently carry out their assigned duties. The Management Board is responsible for strategic direction of S IMMO and group's performance in relation to sustainability. The Supervisory Board supports and advises the Management Board.

At the end of the financial year 2024, the Supervisory Board had three members who were elected by the annual general meeting (shareholder representatives) and one member delegated by the Works Council. The Management Board had three members.

Board Expertise

The members of the Supervisory and Management Boards are experts in their respective fields, ensuring that informed decision-making is made in accordance with regional market trends, regulatory frameworks, and investment opportunities.

(GOV-1_05, GOV-1_07)

The group's commitment to diversity is reflected in the following points relating to the governing bodies without Works Council:

- Gender diversity: 16.7% female representation in governance bodies (One female representative serves on the Management Board, constituting 33% of the total. There are no women on the Supervisory Board as of 31 December 2024)
- Age diversity: Supervisory Board Members with an average age of 43.7 and Management Board members with an average age of 53.3.
- International representation: 100% of the three Management Board members hold international experience.
- The members of the Supervisory Board who do not represent the Works Council are independent. This means that the ratio of independent to non-independent Super-

visory Board members is 75%. The Supervisory Board declares its independence before its election. There is no comparable process for members of the Management Board.

(GOV-1_08, GOV-1_09)

The Board Committees assist the Board by preparing assignments and making recommendations to the entire Supervisory Board. The entire Supervisory Board decides on matters. The members of the Board Committees are appointed by the Supervisory Board from among its members. The main tasks and duties of the individual committees are defined in the Rules of Procedure for the Supervisory Board of S IMMO AG, details on the committees can be found in the report of the Supervisory Board. The entire Supervisory Board fulfilled the responsibilities of the ESG Committee in the financial year 2024.

Responsibility for the supervision of the IROs is embedded in the committees of the Supervisory Board. ESG integration in the committees of the Supervisory Board is structured as shown below:

Body of Governance	Responsibilities related to ESG in accordance with the Rules of Procedure for the Supervisory Board	Material issues addressed in 2024
Audit Committee (3 members)	<ul style="list-style-type: none"> • Monitoring the financial reporting process and auditor's work • Monitoring the effectiveness of the Internal Control System, the risk management and the audit and group audit process 	<ul style="list-style-type: none"> • Quarterly review of risk management report • Review and approval of double materiality assessment process and result for 2024 reporting • Review of result of year-end limited assurance process on non-financial statement • Review and approval of 2024 individual financial statements, consolidated financial statements and annual financial report
Committee for Management Board Matters (Remuneration Committee) (3 members)	<ul style="list-style-type: none"> • Negotiating contracts with members of the Management Board • Determining the remuneration policies for the Management and the Supervisory Board 	<ul style="list-style-type: none"> • Assessment of the competencies required in the management bodies in the event of vacancies • Annual review and approval ensuring that targets defined contribute to the company strategy, long-term interest and sustainability
ESG Committee (2 members)	<ul style="list-style-type: none"> • Matters related to sustainability as well as social, economic and environmental responsibility • Defining ESG strategy • Managing regulatory requirements and addressing ESG-related risks. 	<ul style="list-style-type: none"> • Evaluation of the company's strategy and orientation, of which environmental, sustainability, social and governance topics (ESG) are an integral part • Half-yearly ESG update • Approval of the ESG Group Transition Plan

Management's role in monitoring, managing and overseeing IROs

(GOV-1_10, GOV-1_11, GOV-1_12)

At senior level, the Head of the ESG department leads the sustainability function, with oversight from the ESG Committee. The Head of ESG is responsible for executing sustainability strategies, monitoring performance, and ensuring compliance with regulatory requirements.

The topic of ESG was outsourced to the ESG department at CPI Europe in the course of 2024 and has since been managed by them across the group including S IMMO. The ESG department has been responsible for the Group-wide coordination and implementation of CPI Europe's sustainability strategy and for chairing the cross-functional ESG Committee.

Heads of department report sustainability risks and opportunities to the Head of ESG. The Head of ESG reports to the Management Board quarterly and to the Supervisory Board bi-annually.

(GOV-1_13)

To ensure cross-functional alignment, sustainability controls and procedures must be embedded across key departments:

- Corporate Governance & Strategy – Aligning sustainability goals with corporate mission and risk appetite.
- Finance & Risk Management – Integrating ESG risks into investment decisions, sustainability-linked financing, and reporting.
- Operations & Supply Chain – Implementing ESG criteria in procurement decisions
- Human Resources (HR) – Managing employee well-being, diversity, and sustainability training programmes.
- IT & Data Management – Enhancing ESG data collection.

(GOV-1_14)

The ESG Committee recommends target-setting methodologies and ensures that they align with industry standards and regulatory requirements. The strategy is then approved by the Supervisory Board. However, the entire Supervisory Board fulfilled the responsibilities of the ESG Committee in the past financial year. The Management Board integrates targets into business operations and corporate performance indicators.

Targets are embedded within the organization's strategic planning process to drive business performance and risk management. Inputs from key stakeholders, including investors, employees, and regulatory bodies, are considered when defining material sustainability targets.

The proposed targets undergo a multi-stage review process, where they are evaluated based on feasibility, impact, and alignment with corporate objectives before final approval by the Board.

The organization ensures systematic tracking of progress towards sustainability targets through the following mechanisms:

- Performance Dashboards and KPIs: Regular performance assessments using key performance indicators (KPIs) to measure progress against predefined targets.
- Internal and External Reporting: Periodic sustainability reports provide transparency on achievements, challenges, and adjustments made to targets.

Corrective Actions and Continuous Improvement

- Periodic Reviews: Targets are reviewed annually to assess relevance, effectiveness, and potential need for recalibration.
- Risk Management Adjustments: If progress deviates from expectations, corrective actions are implemented to realign strategies with evolving business conditions.
- Incentives and Performance Alignment: Management compensation and incentives are linked to the achievement of sustainability goals to drive commitment and accountability.

(GOV-1_15, GOV-1_16, GOV-1_17)

The Supervisory Board regularly evaluates the competencies, knowledge and experience of the individual members of the Supervisory Board and the Management Board, including whether they collectively possess, or are able to leverage, relevant sustainability expertise. It has concluded that each individual member of the board has skills that are relevant to the material IROs, as well as to the industry in general, the geographical location of the business activities, and the type of target consumes and end-user. The last self-evaluation was carried out in 2022. As the current Supervisory Board was only constituted at the end of January 2024, an evaluation by the Supervisory Board is planned for the financial year 2025.

Martin Matula has been appointed as one of the founding members of the CPI Property Group's ESG (then CSR) Committee in 2019. He has helped to create and implement the ESG framework for CPI Property Group, notably in the fields of governance, transparency and sustainable financing.

Matej Csenky, as a seasoned real estate, corporate and regulatory lawyer, brings expertise in the fields of governance and compliance.

GOV-2 – Information provided to and sustainability matters addressed by the governing bodies

(GOV-2_01, GOV-2_02, GOV-2_03)

The Supervisory Board and its committees are regularly informed about sustainability issues and consulted for decisions. The reporting lines for information on material IROs are listed under the responsibilities of management (see GOV1).

The report on risk management including sustainability related IRO's is presented to and discussed by the Audit Committee at least four times a year. The impact and risk categories relevant for S IMMO are based on the company's value chain and include sustainability related impacts, opportunities and risks.

S IMMO has defined a broad range of measures to address and counter impacts and risks. These measures represent an integral part of all corporate processes and, consequently, form the basis for the reduction of negative impacts or risks and contribution to positive impact or opportunities.

Implementation of due diligence

Due diligence concerning sustainability matters ensures that organizations adhere to environmental, social, and governance (ESG) goals set by the company. This process involves assessing, identifying, preventing, mitigating, and accounting for sustainability risks and impacts in business operations and supply chains.

The effectiveness of policies, actions, metrics and targets adopted to address IROs

- Establish key performance indicators (KPIs) for sustainability performance.
- Regularly monitor compliance with the company's sustainability goals and regulatory requirements.
- Conduct periodic sustainability audits and third-party assessments.

The quantified risks associated with a specific transaction also serve as a basis for decision-making. The opportunity costs of a possible transaction are communicated to the Management and Supervisory Boards, along with a recommendation that is in line with the corporate strategy. Since sustainability considerations are already part of the corporate strategy, acting in accordance with the strategy also ensures sustainability.

Please refer to table GOV 1_09 for details of the key sustainability topics that the Management Board brought to the attention of the Supervisory Board committees in 2024.

GOV-3 – Integration of sustainability-related performance in incentive schemes

(GOV-3_01, GOV-3_02, GOV-3_03, GOV-3_04, GOV-3_05, GOV-3_06)

The Remuneration Policy in accordance with Section 78a AktG for the Management Board of S IMMO AG is geared towards promoting a long-term and sustainable development of the company. Against this background sustainability targets are anchored in the Remuneration Policy for the Management Board.

In accordance with the 2024 Remuneration Policy, individual and ESG targets derived from the sustainability strategy of S IMMO AG are implemented in the qualitative performance criteria with a total weighting of up to 30%. They take into account

project related goals (such as project progress or successful leasing), strategic goals (such as acquisitions or disinvestments) and non-financial targets. The individual and ESG targets are selected annually from a list of criteria and their weighting are defined by the Committee for Management Board Matters (Remuneration Committee) for each financial year.

For the financial year 2024, the following ESG targets (all equally weighted) have been set for the Management Board:

- Increasing training hours per employee
- Low Risk Sustainability rating
- Purchase of green energy for Wienerberg

Accordingly, 10% of the contractually agreed total remuneration (assuming a 100% target achievement) is dependent on ESG targets.

This Compensation Policy is prepared by the Supervisory Board's Committee for Management Board Matters and submitted to the entire Supervisory Board for approval. The Compensation Policy is established based on a comparison with other listed companies while taking into account the company's business strategy and degree of complexity.

Variable compensation is based on quantitative and qualitative (individual) targets that are in the long-term interest of the company and its shareholders. New target values for variable compensation, including their weightings and the individual goals, are set annually by the Management Board Committee at the start of each financial year, with the targets being set according to the budgetary and medium-term planning as well as the corporate strategy.

The Committee for Management Board Matters regularly evaluates the Compensation Policy to ensure it is in line with business strategy and stakeholder interests. The company is also committed to complying with the results of voting at the Annual General Meeting regarding the presented Compensation Policy. A revised Compensation Policy must be submitted to the Annual General Meeting in 2028 at the latest.

For further details on the remuneration of the Management Board, please refer to the Remuneration Policy 2024 and the Remuneration Report for the financial year 2024 of S IMMO AG, which are published on the company's website.

GOV-4 – Statement on due diligence

(GOV-4_01)

The table below shows the paragraphs that contains disclosures about the current sustainability due diligence performance.

Core elements of due diligence	Paragraphs in the sustainability statement
a) Embedding due diligence in governance, strategy and business model	<ul style="list-style-type: none"> • GOV-2: Information provided to and sustainability matters addressed by the governing bodies; • GOV-3: Integration of sustainability-related performance in incentive schemes; and • SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model.
b) Engaging with affected stakeholders in all key steps of the due diligence	<ul style="list-style-type: none"> • GOV-2: Information provided to and sustainability matters addressed by the governing bodies • SBM-2: Interests and views of stakeholders; • IRO-1 : Description of the processes to identify and assess material impacts, risks and opportunities • MDR-P: Policy Overview; and • Topical ESRS: reflecting the different stages and purposes of stakeholder engagement throughout the due diligence process.
c) Identifying and assessing adverse impacts	<ul style="list-style-type: none"> • IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities; and • SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model
d) Taking actions to address those adverse impacts	<ul style="list-style-type: none"> • ESRS 2 MDR-A; and • E1-1 – Transition plan for climate change mitigation • E3-2 – Actions and resources related to water and marine resources • E5-2 – Actions and resources related to resource use and circular economy • Topical ESRS: reflecting the range of actions, including transition plans, through which impacts are addressed.
e) Tracking the effectiveness of these efforts and communicating	<ul style="list-style-type: none"> • ESRS 2 MDR-M; • ESRS 2 MDR-T; and • E1-4 – Targets related to climate change mitigation and adaptation • E3-3 – Targets related to water and marine resources • E5-3 – Targets related to resource use and circular economy

GOV-5 – Risk management and internal controls over sustainability reporting

(GOV-5_01, GOV-5_02, GOV-5_03)

Following the implementation of the international standards such as Global Reporting Initiative (GRI), Carbon Disclosure Project (CDP) and the EU Taxonomy, S IMMO AG has further expanded and develop the internal control system to encompass the full scope of the sustainability reporting process.

The company's sustainability reporting control system follows an approach similar to the financial reporting control system.

In 2024, S IMMO AG initiated a process description for sustainability reporting that covers the entire process from the results of the materiality analysis to the final sustainability report. The current sustainability reporting process is focused on minimizing operational risks, with a particular emphasis on ensuring a high level of data quality. The process includes internal controls for the ongoing and appropriate assessment of risks related to the integrity, accuracy and completeness of data and the timing of information availability.

This has been done in close cooperation with data owners such as asset managers, department heads of legal, human resources and finance and with external auditors.

Generally, risks related to sustainability data and reporting are addressed on a case-by-case basis through discussions with the data owners and the Management Board, or Audit Committee of the Supervisory Board, depending on materiality.

To mitigate the risk associated with data collection, the ESG team works with internal and external experts to enhance operational knowledge and improve data collection and control systems.

In case of downstream value chain information (e.g. property/tenants' data), the company engages in a dialog with service providers (energy or water suppliers for properties) to ensure a common understanding of the data needs and data quality.

As real estate data availability is also related to the company's portfolio management, the ESG team acts as a central point for improving data availability and quality.

(GOV-5_04, GOV-5_05)

Risk assessment and risk mitigation measures are carried out in connection with regular internal and external reporting. The audits/reviews are carried out by both internal and external auditors. The external review of sustainability statement is carried out by the auditor in line with the financial reporting process. The results of the limited assurance process for nonfinancial reporting, including potential observations or identified risks, are reported to the Audit Committee of the Supervisory Board in connection with half-year and year-end reports.

Internal Audit performs independent and regular reviews of the internal control system, operational processes, and business transactions. The results of the audits are reported regularly to S IMMO's Management Board and twice a year to the Supervisory Board.

Further details are disclosed in the risk management part of the annual report.

Strategy

SBM-1 – Strategy, business model and value chain

(SBM-1_01, SBM-1_02)

S IMMO Group (S IMMO AG and its subsidiaries) is an international property group whose business is long-term real estate investments in the form of the purchase, retention and sale of properties, project development, letting, asset management, building revitalisation and refurbishment as well as the operation of hotels. The company operates in Austria, Germany, and CEE (Hungary, the Czech Republic, Slovakia, and Romania) and owns properties in each of the aforementioned countries. The portfolio consists of offices, commercial property, hotels and a small share of residential properties.

S IMMO concentrates on its core business as a growth-oriented property owner and on the continuous optimization of its portfolio. Over the past few years, the Management Board and Supervisory Board have repeatedly adjusted the portfolio strategy to account for the economic situation, achievable property returns and market values. The focus was on selling low yielding German properties. In Germany, almost all of the properties have been sold by this point. Some transactions are yet to be closed and are expected to be complete by the end of the first half of 2025. The sale of two remaining properties in Germany is planned in 2025. Accordingly, the withdrawal from the German market is expected to take place in the course of 2025/26. The proceeds from the sales create the basis for future growth and earnings.

The Group's property portfolio

As of 31 December 2024, S IMMO Group's property portfolio consisted of 157 properties (31 December 2023: 244) with a book value of EUR 3,418.2m (31 December 2023: EUR 3,477.6m). As of 31 December 2024, the portfolio broken down by main type of use excluding plots of land and based on book values consisted of 65.0% office buildings (31 December 2023: 67.2%), 26.1% retail properties (31 December 2023: 19.4%), 2.5% residential properties (31 December 2023: 6.1%) and 6.4% hotels (31 December 2023: 7.3%). The properties are located in the European Union and have a gross leasable area (total lettable area excluding parking spaces) of around 1.3 million m² (31 December 2023: 1.5 million m²). The high quality of the portfolio and asset management is reflected in strong occupancy rates and returns. The occupancy rate of the portfolio as a whole was 92.2% (31 December 2023: 90.6%). The calculation of the occupancy rate includes all investment properties in the narrower sense (i.e. excluding investment properties with development potential and owner-operated hotels). The overall rental yield came to 6.8% (31 December 2023: 6.8%). The WAULT (weighted average unexpired lease term) was 3.9 years (31 December 2023: 4.1 years).

(SBM-1_03-04)

As of 31 December 2024, the Group employed 643 people excluding Management Board and dormant employees, including employees for hotel operations. A detailed description of the own workforce can be found in section S1 of this statement.

Total number of employees by country¹

	2024
Total number of employees	643
thereof Austria	301
thereof Germany	47
thereof Hungary	294
thereof Croatia	1

¹ Headcounts as of 31 December excluding Management Board and dormant employees

(SBM-1_06, SBM-1_07)

S IMMO's revenues are generated through activities in the real estate sector: rental income (2024: EUR 223.7m) operation of own hotels (2024: EUR 76.5m) and selling of own real estate (2024: EUR 155.8m).

(SBM-1_08)

No other significant ESRS sectors have been identified during the double materiality assessment.

(SBM-1_21 to SBM-1_23)

S IMMO jointly with CPI Europe and CPI Property Group has set up a group wide sustainability strategy which applies to all products, services and customers irrespective of their geographical area. Relevant stakeholders are considered throughout the en-

tire strategy. All major products, services and customers as well as our core markets are part of our value chain as described in chapter SBM-1. All of them are treated with the same level of importance.

Materiality topic	Subtopic	Impact Materiality	Impact Materiality description	Financial Risk/opportunity
Climate change	Climate change mitigation	GHG emissions generated from buildings operations	<p>The operation of the buildings contributing to GHG emissions mainly due to the consumption of fossil resources:</p> <p>Building operation generates a wide range of emissions, from noise to greenhouse gas emissions (GHG Emissions). Greenhouse gases contribute to heat retention in the atmosphere, significantly altering the Earth's climate. Building emissions come from fossil fuels burned for heat, the use of gases for refrigeration and cooling, and the handling of waste.</p> <p>Negative / Actual</p>	<p>Risk of increased cost of fossil fuels</p> <p>Market reputation and investor confidence</p> <p>Financial penalties</p> <p>Carbon pricing mechanism</p>
	Energy	Consumption of energy	<p>Consumption of energy:</p> <p>The building sector, encompassing both construction and operation, is responsible for approximately 40% of global energy consumption and 37% of carbon dioxide emissions. Electricity usage for building operations represents nearly 55% of total global electricity consumption. Energy is generated from natural resources, which are, however, finite. Consequently, the consumption of energy leads to a significant usaging of these limited natural resources.</p> <p>Negative / Actual</p>	<p>Risk of improper adaptation assessment and implementations</p>
Water and Marine resources	Water	Water withdrawal	<p>Water withdrawal:</p> <p>Building operations consume a significant amount of water daily through water appliances, building equipment, and irrigation. Water is one of the most important resources, while water stress, as an imbalance between water demand and availability, is our the most common climate risk. Based on our climate risk assessment, around 10% of the number of our assets are in locations with high water stress, mainly in Romania, but also a very low amount of assets in other countries like Hungary and the UK.</p> <p>Negative / Actual</p>	
Circular economy	Waste	Generation of waste	<p>Generation of waste:</p> <p>Building operations generate a significant amount of waste daily. Poor waste management (in landfills) can cause air pollution and water and soil contamination. Waste also contributes to a building's overall GHG emissions. For our building portfolio, waste is responsible for about 5% of total GHG emissions annually.</p> <p>Negative / Actual</p>	

Financial Materiality description	Time Horizon	Direction	Our target	SDG Description
<p>Risk of increased cost of fossil fuel resources Insufficient transition speed will lead to impairment losses due to the inability to compete and will mean high costs due to limited fossil fuel resources.</p> <p>Market Reputation and Investor Confidence Achieving GHG emissions reduction targets enhances a company's reputation. Investors increasingly prioritise sustainable practices, and companies that meet their climate goals are more attractive. Non-compliance with emissions reduction goals could negatively affect property valuation and attractiveness.</p> <p>Financial Penalties Failure to meet the GHG emissions reduction target may result in financial penalties and increased expenses.</p> <p>Carbon Pricing Mechanism The carbon tax mechanism will be in place in 2027, and the EU ETS applies to the real estate sector. The carbon tax applies to S1+S2 emissions.</p>	Mid-term	Upstream Own operations Downstream	32.4% reduction in GHG intensity of property portfolio, incl. bioenergy, by year 2030 versus 2019 baseline (validated by Science-based Target initiative in July 2022 in alignment with the Paris Agreement's well below 2°C scenario)	<p>13 Take urgent action to combat climate change and its impacts</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Increased share of certified buildings Group-wide green lease</p>
<p>Risk of improper adaptation assessment and implementations The potential risk lies in the possibility of a flawed assessment at the local level, will resulting in an inadequately crafted adaptation plan for the future. Another risk lies in insufficiently fast implementation of the adaptation plan. Both risks lead to unnecessary costs for the company.</p>	Mid-term	Own operations Downstream	<p>10% reduction in energy intensity of the property portfolio by year 2030 versus 2019 baseline</p> <p>Increase in EU Taxonomy alignment of economic activities at the consolidated Group level over time</p>	<p>12 Ensure sustainable consumption and production patterns</p> <p>13 Take urgent action to combat climate change and its impacts</p> <p>9 Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation</p>
	Mid-term	Own operations Downstream	10% reduction in water intensity of property portfolio by year 2030 versus 2019 baseline	<p>12 Ensure sustainable consumption and production patterns</p> <p>6 Ensure availability and sustainable management of water and sanitation for all</p>
	Short-term Mid-term	Own operations Downstream	Elimination of waste sent to landfill wherever possible, waste recycling rate of 55% by year end 2025 and 60% by year end 2030	12 Ensure sustainable consumption and production patterns

Materiality topic	Subtopic	Impact Materiality	Impact Materiality description	Financial Risk/opportunity
Own workforce	Working conditions (Secure employment, Health and Safety)	Increased Productivity Reduced Turnover Mental Health Issues	<p>Increased Productivity and Reduced Turnover Employees who feel secure in their jobs are more likely to be productive and focused. They can dedicate their energy to their tasks without the distraction of job insecurity, and they are less likely to leave the company.</p> <p>Mental Health Issues Job insecurity can lead to chronic stress, anxiety, and depression.</p> <p>Health and Safety Without proper health and safety measures, employees are more likely to experience accidents, which can lead to injuries. This not only affects their well-being but also results in lost workdays. Effective health and safety protocols significantly reduce the risk of workplace accidents, which is particularly important in the property sector.</p> <p>Negative / Potential</p>	
	Equal treatment and opportunities for all (Gender equality and equal pay for work of equal value)	Gender inequality	<p>Gender inequality Having a low percentage of women in top management, a significant gender pay gap, and promoting discrimination in hiring and promotion can lead to violations of gender equality, along with the employee's ability to live free from all forms of discrimination (gender, racial, ethnic, age, etc.) and to access justice in an equal and inclusive way. Gender inequality can create a hostile work environment, hindering teamwork and the sharing of ideas.</p> <p>Negative / Potential</p>	
	Equal treatment and opportunities for all (Training and skills development)	Enhanced Employee Performance and Productivity	<p>Enhanced Employee Performance and Productivity Well-trained employees are more efficient and effective in their roles, directly contributing to the overall productivity and success of the business. While complying with legislation is important, going beyond the minimum standards can provide a competitive edge.</p> <p>Positive / Actual</p>	
	Equal treatment and opportunities for all (Diversity)	Creativity and Innovation Better Market Understanding	<p>Creativity and Innovation and Better Market Understanding A diverse workforce brings together different perspectives and experiences, leading to more creative solutions and innovative approaches to business challenges. Given our company's presence in multiple markets, we benefit from a diverse team. We employ individuals of all genders, various age groups and actively encourage the collaboration of employees from different generations within teams, fostering greater expertise and adaptability.</p> <p>Positive / Actual</p>	

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Financial Materiality description	Time Horizon	Direction	Our target	SDG Description
	Mid-term	Own operations	Biennial employee satisfaction surveys Code of Conduct agreement with all employees	10 Reduce inequality within and among countries 8 Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all
	Mid-term	Own operations	Minimum of 33% share of female senior managers	5 Achieve gender equality and empower all women and girls 8 Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all
	Mid-term	Own operations	Completion of at least eight hours of training per employee per year Mandatory annual employee training on Code of Conduct and associated policies	8 Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all 4 Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all
	Mid-term	Own operations	Minimum of 33% share of female senior managers	5 Achieve gender equality and empower all women and girls 8 Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

Materiality topic	Subtopic	Impact Materiality	Impact Materiality description	Financial Risk/opportunity
Business conduct	Corporate culture	Toxic work environment Unethical Decision Making	<p>Toxic work environment A corporate culture that tolerates or promotes unhealthy competition, discrimination, or harassment can result in a toxic work environment, leading to reduced employee morale and higher turnover rates.</p> <p>Unethical Decision Making If the prevailing culture prioritizes profits over ethics, it may lead to decisions that harm customers, the environment, or other stakeholders.</p> <p>Negative / Potential</p>	Reputation and Financial Impact Risk
	Protection of whistle-blowers	Enhanced Transparency and Accountability Retaliation Against Whistleblowers	<p>Enhanced Transparency Encouraging employees to report unethical or illegal activities without fear of retaliation promotes a culture of openness and integrity. It promotes ethical practices among suppliers and partners and ensures that the entire value chain adheres to high standards of conduct.</p> <p>Retaliation Against Whistleblowers If employees or others who raise concerns about unethical or illegal activities within the company face retaliation, it infringes on their rights and creates a culture of fear, inhibiting transparency and accountability.</p> <p>Negative / Actual</p>	
	Corruption and bribery			

All identified material impacts, risks and opportunities are disclosed under SBM-3 in this statement.

(SBM-1_25 to SBM-1_28)

We have outlined our upstream value chain by identifying the necessary inputs to effectively execute our core business activities as a starting point for our double materiality assessment. We focused on key activities, inputs, and primary suppliers while considering local variations. Beginning with our core business, we identified our principal product: office and retail real estate. Subsequently, we established the sales channels for our products and recognized our tenants as customers. We use in-house sale, our own websites as well as external real estate agents for the renting of our premises. Sales and acquisitions of properties are carried out via external agents.

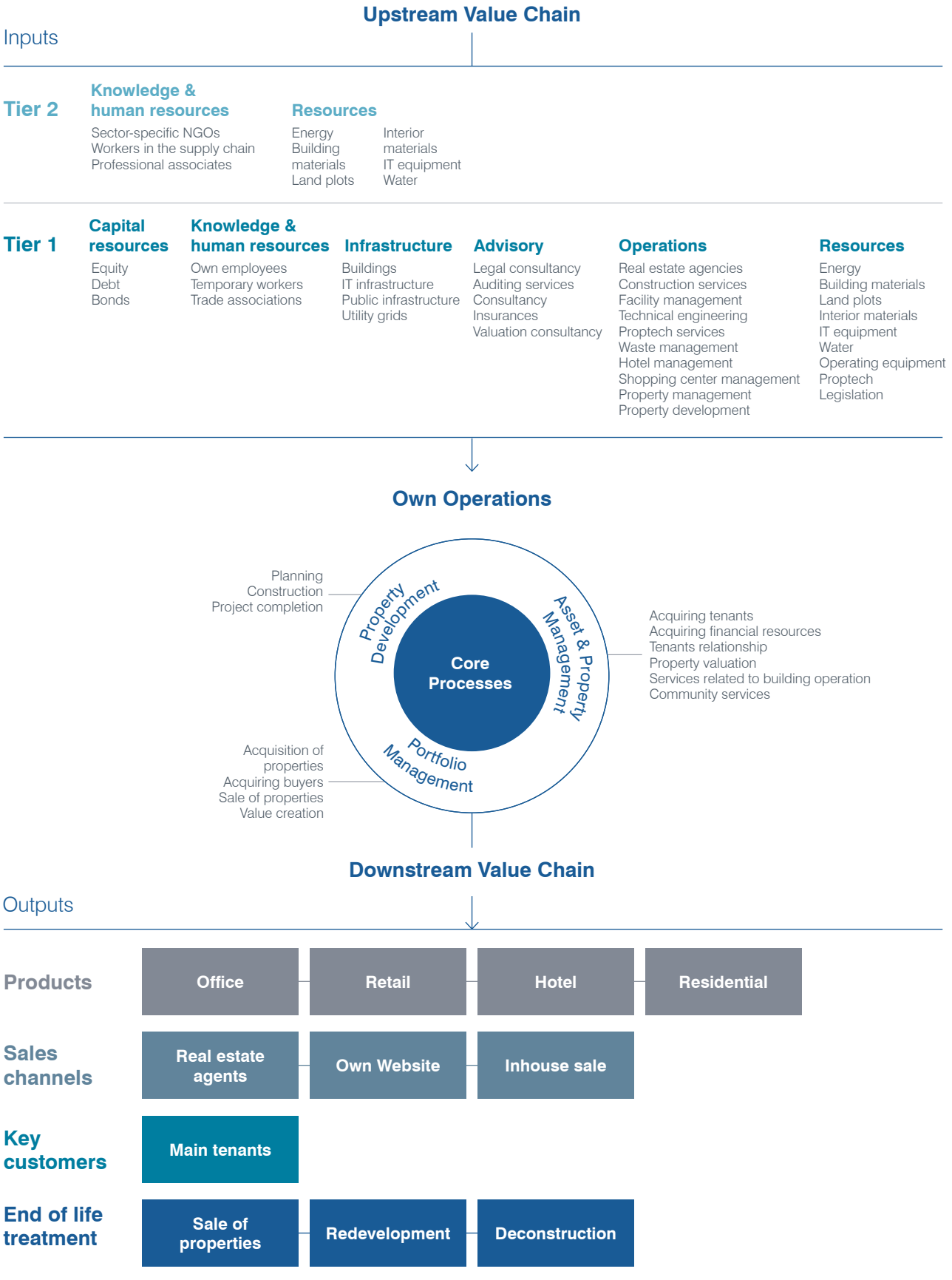
Our office portfolio offers rental space for all needs, every enterprise from start-up business to large international companies are potential tenants for us. In the retail portfolio we concentrate on tenants-mix suitable for retail parks and shopping centers. End-users are our tenants and their employees as well as visitors of our retail properties and hotel guests.

Our downstream value chain ends with the end-of-life treatment for our products. Our upstream value chain was divided into Tier 1 and 2. For Tier 1 we identified capital resources, knowledge & human resources, infrastructure, advisory, operations and resources for building operations as key for our business model. Please refer to the value chain graphic below for more information.

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Financial Materiality description	Time Horizon	Direction	Our target	SDG Description
	Mid-term	Own operations	Mandatory annual employee training on Code of Conduct and associated policies	16 Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels
	Mid-term	Upstream Own operations Downstream	Mandatory annual employee training on Code of Conduct and associated policies	8 Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all
<p>Reputation and Financial Impact Risk Incidents such as fraud, or accidents can lead to immediate financial losses. Incidents can harm our reputation, leading to loss of customer trust and potential business. This can result in decreased sales and market share.</p>	Short-term	Own operations	Mandatory annual employee training on Code of Conduct and associated policies	16 Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels

Real Estate Value Chain for S IMMO Group



SBM-2 – Interests and views of stakeholders

(SBM-2_01 to SBM-1_12)

S IMMO – together with CPI Property Group and CPI Europe – identified important groups of affected stakeholders and users of the sustainability statement relevant for its business. With wide range of stakeholders (including tenants, employees, investors, and members of local communities) the Group maintains a continuous and regular dialogue.

Stakeholder engagement supports us in identifying existing or emerging impacts or risks as part of the double materiality assessment (DMA). Their insights provide valuable input to our ESG programmes, helping us to shape our strategy, targets and decisions towards delivering on ESG commitments and KPIs.

The table below shows prioritised stakeholder groups and how we engage with them:

Group of stakeholders	Stakeholders' expectation	Engagement channel
Tenants	Excellent products and services	Daily operations
Investors	Solid business model, strategies and goals	Presentations, website, corporate news
Employees	Decent work conditions, training and development, diversity, equality	Employees interactions, surveys, hot line
Authorities and governments	Compliance with regulations	Industry associations, engagement with the authorities
Suppliers and business partners	Fair business practices and treatment	Contract management
Communities	Responsibility for the environment and the society	Engagement with the local associations, events

For the purpose of double materiality assessment, we selected a sample of our stakeholders and performed a survey to help us identify material sustainability impacts, risks and opportunities.

Together with CPI Europe, S IMMO conducted an online survey to gather stakeholder feedback on its material sustainability matters, receiving 171 anonymous responses. Key topics identified by stakeholders included affected communities, supply chain, biodiversity, compliance, digitalization, and corporate governance. After evaluation, compliance and corporate governance were categorized as material topics essential to the Group's ESG Strategy. Other topics were reviewed by the ESG Committee, which did not identify additional material issues for 2024. The Group remains committed to ongoing stakeholder engagement.

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

(SBM-3_01, SBM-3_02)

Material Issue	IRO	+/-	a/p	Direction
E1 Climate change				
(1) GHG emissions generated from buildings operations	I	-	a	OO/UP/DW
(2) Consumption of energy	I	-	a	OO/DW
(3) Increased cost of fossil fuels resources	R	-		UP
(4) Carbon pricing mechanism - buildings to be integrated into EU ETS2 starting 2027	R	-		UP
(5) Non-compliance with ESG targets lead to loss in investors' confidence	R	-		DW
(6) Inadequate adaptation solutions	R	-		OO
E3 Water and marine resources				
(7) Water withdrawal	I	-	a	OO
E5 Circular economy				
(8) Generation of waste	I	-	p	OO/DW
S1 Own workforce				
(9) Increased productivity Reduced turnover	I	-	p	OO
(10) Mental health issues	I	-	p	OO
(11) Increased risk of accidents and injuries	I	-	p	OO
(12) Gender inequality	I	-	a	OO
(13) Enhanced employee performance and productivity	I	+	a	OO
(14) Creativity and innovation leading to innovative solutions and better market understanding	I	+	a	OO
G1 Business conduct				
(15) Toxic work environment Unethical decision making	I	-	p	OO/UP/DW
(16) Enhanced transparency and accountability Retaliation against whistleblowers	I	-	p	OO/UP/DW
(17) Inadequate processes and trainings	R	-		OO

I ... Interest, R ... Risk, O ... Opportunity, + ... positive, - ... negative, a ... actual, p ... potential, OO ... own operations, UP ... upstream value chain, DW ... downstream value chain

(SBM-3_03 to SBM-3_10)

The Group closely monitors both internal and external environment and assesses the related impacts, risks and opportunities of its operations. As part of this process, the Group conducted the double materiality assessment across of all of its activities and geographies in 2024, aimed to assess an impact of the Group's activities on the environment and society, as well as identify potential sustainability risks. Through this process, the Group has defined 17 sustainability matters as material, the response to which forms part of the Group's business strategy.

The current financial effects of the Group's material risks and opportunities on its financial position, financial performance and cash flows are not material and there are no material risks and opportunities for which there is a significant risk of a material adjustment within the next annual reporting period to the carrying amounts of assets and liabilities reported in the Group's financial statements.

Given that our material Impacts, Risks, and Opportunities (IROs) are closely tied to our core business and growth potential, our initiatives aimed at enhancing opportunities and mitigating associated risks are integrated within our established corporate governance approach described above. The resilience of the Group's strategy and business model were assessed by the internal risk manager and addressed as part of the Group's risk and opportunity assessment.

Changes to material IROs are not relevant for the year 2024 as the DMA was carried out for the first time following the Group's ongoing CSRD implementation. All material IROs are covered by ESRS Disclosure Requirements.

Impact, risk and opportunity management

Disclosures on the materiality assessment process

IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities

(IRO-1_01 to IRO-1_12, 13, 14)

An analysis to identify the actual and potential impacts, risks, and opportunities (IROs) associated with environmental, social, and governance (ESG) matters within our operations and throughout our upstream and downstream value chains was conducted. Initially, we evaluated the IROs at a detailed sub-subtopic level in accordance with ESRS 1 AR16. Subsequently, we incorporated ESG-related IROs identified in the existing risk management documentation of CPI Property Group, CPI Europe and S IMMO. To enrich our assessment and identify all possible impacts, risks and opportunities, we took into account the material topics identified in the previous materiality assessments conducted by CPI Europe in 2020 and S IMMO AG in 2021, following the GRI Universal Standards. This analysis resulted in a comprehensive list of impacts, risks, and opportunities, which was subsequently evaluated by the internal cross-departmental project group in terms of their impact and financial materiality taking into account specific activities, stakeholders, segments and geographies affected. Additionally, the assessment has evaluated direction - upstream, own operation, downstream -, and time horizon – short-term, mid-term, long-term. The same time horizons as defined by ESRS were applied. Risks were identified as a result of impacts or dependencies.

Negative impacts are based on their relative severity and likelihood. Severity of negative impacts is based on their scale, scope and irremediable character. Positive impacts are based on their relative scale, scope and likelihood. Each impact has been considered individually, because the application of criteria of severity differs among various categories of impacts. The severity of an actual or potential negative impact is assessed from the perspective of the affected people or the environment.

The assessment of risks and opportunities is done based on a combination of the likelihood of occurrence and the potential magnitude/size of the financial effects in line with the group-wide risk and opportunity assessment.

For impacts the following criteria/thresholds were used to determine material ones taking into account scope of impact, scale of impact and irremediability based on EFRAG guidance:

≥ 4	Critical	Material
$>3 - 4$	Significant	Material
$>2.5 - 3$	Important	Material
2-2.5	Informative	Not material
< 2	Minimal	Not material

For risks and opportunities, the following criteria/thresholds were used to determine material risks and opportunities based on discussion with the Group Risk Manager:

≥ 2.5	Significant	Material
< 2.5	Normal	Not material

(E2.IRO1_01 to 03, E4.IRO1_01 to 16)

In the course of the double materiality assessment as described in IRO-1 our business activities including our assets as well as our value chain were also screened for any biodiversity and ecosystems and pollution related impacts, risks and opportunities. They were assessed as immaterial as the Group is not involved in any production processes and has limited scope of real estate development activities. Due to the limited scope, consultations with affected communities were not considered to be necessary.

We have conducted a pilot assessment of our portfolio's locations to evaluate their potential impact on biodiversity. Our assessment incorporates legally protected areas and Key Biodiversity Areas (KBAs), utilising publicly available data from the European Environment Agency. The priority properties are predominantly located in the Czech Republic and several German cities, including Berlin, Leipzig, and Erfurt. Additional regions with a significant number of priority properties comprise Budapest and Vienna.

IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement

(IRO-2_01)

Disclosure Requirement	Data point		SFDR reference Indicator Number	Pillar 3 reference	Benchmark Regulation reference Delegated Regulation	EU Climate Law reference	Relevance
ESRS 2 GOV-1	21 (d)	Board's gender diversity paragraph	13 of Table #1 of Annex 1		(EU) 2020/1816, Annex II		Material
ESRS 2 GOV-1	21 (e)	Percentage of board members who are independent			(EU) 2020/1816, Annex II		Material
ESRS 2 GOV-4	30	Statement on due diligence	10 Table #3 of Annex 1				Material
ESRS 2 SBM-1	40 (d) i	Involvement in activities related to fossil fuel activities	4 Table #1 of Annex 1	Article 449a Reg. (EU) No 575/2013 Comm. Impl. Reg. (EU) 2022/2453 Table 1 and Table 2	(EU) 2020/1816, Annex II		Not material
ESRS 2 SBM-1	40 (d) ii	Involvement in activities related to chemical production	9 Table #2 of Annex 1		(EU) 2020/1818, Article 12(1) (EU) 2020/1816, Annex II		Not material
ESRS 2 SBM-1	40 (d) iii	Involvement in activities related to controversial weapons	14 Table #1 of Annex 1		(EU) 2020/1818, Article 12(1) (EU) 2020/1816, Annex II		Not material
ESRS 2 SBM-1	40 (d) iv	Involvement in activities related to cultivation and production of tobacco			(EU) 2020/1818, Article 12(1) (EU) 2020/1816, Annex II		Not material
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050				Regulation (EU) 2021/1119, Article 2(1)	Material
ESRS E1-1	16 (g)	Undertakings excluded from Paris-aligned Benchmarks		Article 449a Reg. (EU) No 575/2013 Comm. Impl. Reg. (EU) 2022/2453 Template 1	(EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		Material
ESRS E1-4	34	GHG emission reduction targets	4 Table #2 of Annex 1	Article 449a Reg. (EU) No 575/2013 Comm. Impl. Reg. (EU) 2022/2453 Template 3	(EU) 2020/1818, Article 6		Material
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources (among other impact sectors)	5 Table #1 3 Table #2 of Annex 1				Material
ESRS E1-5	37	Energy consumption and mix	5 Table #1 of Annex 1				Material
ESRS E1-5	40 to 43	Energy intensity associated with activities in high climate impact sectors	6 Table #1 of Annex 1				Material
ESRS E1-6	44	Gross Scope 1, 2, and Total GHG emissions	1 and 2 Table #1 of Annex 1	Article 449a Reg. (EU) No 575/2013 Comm. Impl. Reg. (EU) 2022/2453 Template 1	(EU) 2020/1818, Article 5(1), 6 and 8(1)		Material
ESRS E1-6	53 to 55	Gross GHG emissions intensity	3 Table #1 of Annex 1	Article 449a Reg. (EU) No 575/2013 Comm. Impl. Reg. (EU) 2022/2453 Template 3	(EU) 2020/1818, Article 8(1)		Material

Disclosure Requirement	Data point		SFDR reference Indicator Number	Pillar 3 reference	Benchmark Regulation reference Delegated Regulation	EU Climate Law reference	Relevance
ESRS E1-7	56	GHG removals and carbon credits				Regulation (EU) 2021/1119, Article 2(1)	Not material
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks			(EU) 2020/1816, Annex II (EU) 2020/1816, Annex II		Not material
ESRS E1-9	66 (a)	Disaggregation of monetary amounts by acute and chronic physical risk		Article 449a Reg. (EU) No 575/2013 Comm. Impl. Reg. (EU) 2022/2453 paragraphs 46 and 47; Template 5			Not material
ESRS E1-9	66 (c)	Location of significant assets at material physical risk					Not material
ESRS E1-9	67 (c)	Breakdown of the carrying value of its real estate assets by energy-efficiency classes		Article 449a Reg. (EU) No 575/2013 Comm. Impl. Reg. (EU) 2022/2453 paragraph 34; Template 2			Material
ESRS E1-9	69	Degree of exposure of the portfolio to climate-related opportunities			(EU) 2020/1818, Annex II		Material
ESRS E2-4	32	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water, and soil	8 Table #1 of Annex 1 2 Table #2 of Annex 1 4 Table #2 of Annex 1 1 Table #2 of Annex 1				Not material
ESRS E3-1	9	Water and marine resources	7 Table #2 of Annex 1				Material
ESRS E3-4	28 (c)	Total water recycled and reused	6.2 Table #2 of Annex 1				Material
ESRS E3-4	29	Total water consumption in m ³ per net revenue on own operations	6.1 Table #2 of Annex 1				Material
ESRS 2- SBM3 - E4	16 (a) i	Biodiversity sensitive areas	7 Table #1 of Annex 1				Not material
ESRS 2- SBM3 - E4	16 (b)	Land impacts	10 Table #2 of Annex 1				Not material
ESRS 2- SBM3 - E4	16 (c)	Threatened species	14 Table #2 of Annex 1				Not material
ESRS E4-2	24 (b)	Sustainable land / agriculture practices or policies	11 Table #2 of Annex 1				Not material
ESRS E4-2	24 (c)	Sustainable oceans / seas practices or policies	12 Table #2 of Annex 1				Not material
ESRS E4-2	24 (d)	Policies to address deforestation	15 Table #2 of Annex 1				Not material
ESRS E5-5	37 (d)	Non-recycled waste paragraph	13 Table #2 of Annex 1				Material
ESRS E5-5	39	Hazardous waste and radioactive waste	9 Table #1 of Annex 1				Material
ESRS 2- SBM3 - S1	14 (f)	Risk of incidents of forced labour	13 Table #3 of Annex 1				Material

Disclosure Requirement	Data point		SFDR reference Indicator Number	Pillar 3 reference	Benchmark Regulation reference Delegated Regulation	EU Climate Law reference	Relevance
ESRS 2- SBM3 - S1	14 (g)	Risk of incidents of child labour	12 Table #3 of Annex 1				Material
ESRS S1-1	20	Human rights policy commitments	9 Table #3 of Annex 1 11 Table #1 of Annex 1				Material
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	9 Table #1 of Annex 1		(EU) 2020/1816, Annex II		Material
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	11 Table #3 of Annex 1				Not material
ESRS S1-1	23	Workplace accident prevention policy or management system	1 Table #3 of Annex 1				Material
ESRS S1-3	32 (c)	Grievances/complaints handling mechanisms	5 Table #3 of Annex 1				Material
ESRS S1-14	88 (b) and (c)	Number of fatalities and number and rate of work-related accidents	2 Table #3 of Annex 1		(EU) 2020/1816, Annex II		Material
ESRS S1-14	88 (e)	Number of days lost to injuries, accidents, fatalities or illness	3 Table #3 of Annex 1		(EU) 2020/1816, Annex II		Material
ESRS S1-16	97 (a)	Unadjusted gender pay gap	12 Table #1 of Annex 1		(EU) 2020/1816, Annex II		Material
ESRS S1-16	97 (b)	Excessive CEO pay ratio	8 Table #3 of Annex 1				Material
ESRS S1-17	103 (a)	Incidents of discrimination	7 Table #3 of Annex 1				Material
ESRS S1-17	104 (a)	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines	10 Table #1 of Annex 1 14 Table #3 of Annex 1		(EU) 2020/1816, Annex II (EU) 2020/1818, Art 12 (1)		Material
ESRS 2- SBM3 - S2	11 (b)	Significant risk of child labour or forced labour in the value chain	12 and 13 Table #3 of Annex 1				Not material
ESRS S2-1	17	Human rights policy commitments	9 Table #3 of Annex 1 11 Table #1 of Annex 1				Not material
ESRS S2-1	18	Policies related to value chain workers	11 and n. 4 Table #3 of Annex 1				Not material
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	10 Table #1 of Annex 1		(EU) 2020/1816, Annex II (EU) 2020/1818, Art 12 (1)		Not material
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			(EU) 2020/1816, Annex II		Not material
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	14 Table #3 of Annex 1				Not material

Disclosure Requirement	Data point		SFDR reference Indicator Number	Pillar 3 reference	Benchmark Regulation reference Delegated Regulation	EU Climate Law reference	Relevance
ESRS S3-1	16	Human rights policy commitments	9 Table #3 of Annex 1 11 Table #1 of Annex 1				Not material
ESRS S3-1	17	Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines	10 Table #1 of Annex 1		(EU) 2020/1816, Annex II (EU) 2020/1818, Art 12 (1)		Not material
ESRS S3-4	36	Human rights issues and incidents	14 Table #3 of Annex 1				Not material
ESRS S4-1	16	Policies related to consumers and end-users	9 and 11 Table #1 of Annex 1				Not material
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	10 Table #1 of Annex 1		(EU) 2020/1816, Annex II (EU) 2020/1818, Art 12 (1)		Not material
ESRS S4-4	35	Human rights issues and incidents	14 Table #3 of Annex 1				Not material
ESRS G1-1	10 (b)	United Nations Convention against Corruption	15 Table #3 of Annex 1				Not material
ESRS G1-1	10 (d)	Protection of whistle-blowers	6 Table #3 of Annex 1				Not material
ESRS G1-4	24 (a)	Fines for violation of anti-corruption and anti-bribery laws	17 Table #3 of Annex 1		(EU) 2020/1816, Annex II		Material
ESRS G1-4	24 (b)	Standards of anti-corruption and anti-bribery	16 Table #3 of Annex 1				Material

(IRO-2_02)

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		SBM-3	
Impact, risk and opportunity management	ESRS 2	IRO-1	109
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		MDR-P	
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Water and marine resources	E3	E3.IRO-1	148
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Resource use and circular economy	E5	E5.IRO-1	152
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Chapter	ESRS standard	Disclosure requirement	Page number
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Governance			
Business Conduct	G1	G1.GOV-1	165
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		G1-3	
		G1-4	

MDR–P – Policies adopted to manage material sustainability matters

Internally, S IMMO differentiates between policies and guidelines. While policies are aimed at external stakeholders, guidelines are directed at S IMMO employees. To ensure complete information in line with the CSRD, both forms of instructions are addressed equally in the following. All policies or guidelines within S IMMO must be approved by the Management Board being the highest body responsible for the policies.

S IMMO has issued the following policies and guidelines:

Policy	Description of key contents	Scope of policy	Accountable for implementation	Internationally recognised instruments	Availability	IRO covered
Anti-Corruption, Anti-Bribery and Countering of Frauds Policy	<ul style="list-style-type: none"> Ensures legally compliant behaviour by employees, business partners, agents and customers. Ensures compliance of the Group with applicable laws relating to anti-corruption, anti-bribery and countering of frauds; to prevent conflicts of interest from arising. Sensitises Representatives for potential conflicts of interest and thereby protect them from criminal offenses. Prevents damage to the Group's reputation as a result of improper practices. 	Group ("Group" means CPI Europe AG and its subsidiaries, including S IMMO AG and S IMMO AG's group)	Executive Board of CPI Europe AG that acts through the Compliance Officer	UN Convention against Corruption	Corporate website & Corporate intranet	(15), (16), (17)
Anti-Money Laundering and Counter-Terrorist Financing Policy	<ul style="list-style-type: none"> Ensures compliance of the Group with applicable laws relating to the AML and the CTF. Ensures that the Representatives understand the importance of the AML and the CTF and their related responsibilities. 	Group ("Group" means CPI Europe AG and its subsidiaries, including S IMMO AG and S IMMO AG's group companies)	Executive Board of CPI Europe AG that acts through the Compliance Officer	EU Directive on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing	Corporate website & Corporate intranet	(15), (16), (17)

Policy	Description of key contents	Scope of policy	Accountable for implementation	Internationally recognised instruments	Availability	IRO covered
Code of Business Ethics and Conduct	<ul style="list-style-type: none"> Creates the foundation for all of the company's business activities and decisions and declares commitment to obey applicable laws, industry standards and best practices. Forms basis for the morally, ethically and legally correct behaviour of all employees, agents acting on behalf of the Group, as well as for all members of the Group's corporate bodies and management 	Group (CPI Europe AG and its subsidiaries, including S IMMO AG and S IMMO AG's group companies unless there is a separate code in place)	Executive Board of CPI Europe AG that acts through the Compliance Officer	<ul style="list-style-type: none"> The Universal Declaration of Human Rights by the United Nations (UN) UN Guiding Principles for Human Rights and Business UN Convention on the Rights of the Child UN Convention on the Elimination of All Forms of Discrimination against Women The Fundamental Conventions of the International Labour Organisation (ILO) The Guidelines for Multinational Enterprises by the Organisation for Economic Co-operation and Development (OECD) The ten principles of the UN Global Compact (UNGC). 	Corporate website & Corporate intranet	all
Organisational Policy Issuer Compliance	Ensures that S IMMO's statutory obligations are complied with, prevents the prohibited use or disclosure of inside information and guarantees compliance with the publication obligations for inside information (ad hoc notifications).	S IMMO AG	Management Board of S IMMO AG that acts through the Compliance Officer	<ul style="list-style-type: none"> EU Regulation on market abuse Austrian Stock Exchange Act 2018 	Corporate intranet	(15), (16), (17)
CPIPG GHG Recalculation Policy	Sets the rules for recalculations of the Greenhouse Gas emissions inventory. These rules are specified based on SBTi requirements and include structural, methodology and other changes.	Group (all member companies of CPIPG)		SBTi requirements		(1), (5)
Group Human Capital and Employment Relationships Policy	Provides guiding principles relating to the treatment of the Group's candidates and Representatives and certain other topics relevant for human capital.	Group ("Group" means CPI Europe AG and its subsidiaries)	Executive Board of CPI Europe AG that acts through its Human Resources Manager(s) within the Group	International Labour Organization conventions and recommendations	Corporate intranet	(9), (10), (11), (12), (13), (14)
Group LCA Policy	Shows how the transformation of business operations towards carbon neutrality can be achieved.	Group (all member companies of CPIPG)	Directors of any involved organization of CPIPG	2015 Paris Agreement within the United Nations Framework Convention on Climate Change	Corporate intranet	(1), (5)
Group Policy Environment and CSR	<ul style="list-style-type: none"> Promotes a sustainable approach of the Group towards real estate development and management; Gives a blueprint for the contribution of the Group to the protection of the environment, improvement of energy performance, as well as to the development of the communities. 	Group ("Group" means CPI Europe AG and its subsidiaries)	Executive Board of CPI Europe AG that acts through the ESG Committee of the Group	<ul style="list-style-type: none"> 17 Sustainable Development Goals defined by the United Nations 2015 Paris Agreement within the United Nations Framework Convention on Climate Change 	Corporate intranet	(1), (2), (3), (4), (5), (6), (7), (8)
Guideline on Education and Further Training	Regulates the general conditions for internal and external education and further training and the reimbursement of training costs.	Group (all employees of CPI Europe and its subsidiaries)	Executive Board of CPI Europe AG		Corporate intranet	(9), (13)

Policy	Description of key contents	Scope of policy	Accountable for implementation	Internationally recognised instruments	Availability	IRO covered
Organisational Policy Human Rights	Formulates commitment to protecting human rights, describes organization and responsibilities, and documents human rights diligence process.	S IMMO AG	Management Board of S IMMO AG	<ul style="list-style-type: none"> The Universal Declaration of Human Rights of the United Nations (UN) UN Guiding Principles for Business and Human Rights UN Convention on the Rights of the Child UN Convention on the Elimination of Discrimination of Women The Convention of the International Labour Organization (ILO) The Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development (OECD) The ten principles of the UN Global Compact (UNGC) 	Corporate website	(9), (10), (11), (12), (13), (14)
Risk Management Policy	Provides the basis of the risk management and describes the minimum requirement in terms of the setup of the organisational structure and process structure in risk management.	Group	Executive Board of CPI Europe AG	<ul style="list-style-type: none"> Austrian Corporate Governance Codex (ÖCGK) Integrated Framework of COSO ERM 	Corporate intranet	all
Transition Plan ESG	Shows how the transformation of business operations towards carbon neutrality can be achieved.	Group (all companies controlled by the group)	Executive Board of CPI Europe AG	2015 Paris Agreement within the United Nations Framework Convention on Climate Change	Corporate Intranet	(1), (2), (3), (4), (5), (6), (7), (8)
Whistleblowing System Directive	Sets out the communication channels and compulsory regulations for the receipt, submission, assessment and processing of whistleblowing reports within CPI Europe.	Group	Executive Board of CPI Europe AG that acts through the Compliance Officer	General Data Protection Regulation	Corporate website & Corporate intranet	(15), (16), (17)

Environmental information

Disclosures pursuant to Article 8 of Regulation 2020/852 (Taxonomy Regulation)

Reporting practice

Taxonomy eligibility of S IMMO Group

Since 2022, S IMMO Group is reporting according to Art. 8 of the Taxonomy Regulation of the European Union and thus closely monitoring the regulatory environment.

The following regulations and notices in the latest version have been reviewed for applicability within the whole group:

- Commission Delegated Regulation (EU) 2021/2139
- Commission Delegated Regulation (EU) 2022/1214
- Commission Delegated Regulation (EU) 2023/2485
- Commission Delegated Regulation (EU) 2023/2486
- Commission Delegated Regulation (EU) 2021/2178
- Commission Notice on the interpretation and implementation of certain legal provisions of the EU Taxonomy Regulation and links to the Sustainable Finance Disclosure Regulation (2023/C 211/01) (FAQ)
- Commission Notice on the interpretation and implementation of certain legal provisions of the Disclosures Delegated Act under Article 8 of the EU Taxonomy Regulation on the reporting of taxonomy-eligible and taxonomy-aligned economic activities and assets (third Commission Notice)
- Draft Commission Notice on the interpretation and implementation of certain legal provisions of the EU Taxonomy Environmental Delegated Act, the EU Taxonomy Climate Delegated Act and the EU Taxonomy Disclosures Delegated Act (29 November 2024)

The analysis led to the following applicable eligible economic activities in the 2024 financial year:

Climate Change Mitigation (CCM) / Climate Change Adaptation (CCA) 7.7 Acquisition and ownership of buildings

The turnover from S IMMO's hotel operations are reported under "Income from owner-operated properties" in the S IMMO Group consolidated financial statements.

The group's core activities asset & property management, property development and portfolio management are clearly linked to "Buying real estate and exercising ownership of that real estate" as this activity is described in the taxonomy legislation. Further details can be found in the description of our business model under ESRS 2, SBM 1-25. All turnover, capital and operational expenditures related to buildings are disclosed under this economic activity except for installation, maintenance and repair of energy efficiency equipment which is reported under CCM 7.3 and installation, maintenance and repair of renewable

energy technologies which is reported under CCM 7.6 if they belong to single measures not connected to taxonomy-aligned buildings.

Since the description of economic activity CCM 7.7 and the definition of the technical screening criteria are based on the exercise of ownership of real estate, neither turnover, CapEx nor OpEx in connection with undeveloped land are subsumed under this economic activity. Additions to other intangible assets and other tangible assets are also classified as non-taxonomy-eligible as they don't represent expenditures connected to buildings.

As the economic activity "CCM 7.7 Acquisition and ownership of buildings" does not constitute an enabling activity pursuant to Article 16 of Regulation (EU) 2020/852, no turnover may be reported as taxonomy-eligible or taxonomy-aligned under the environmental objective "climate change adaptation". In addition, no adaptation solutions for significant physical climate risks have been implemented so far, which is why no capital expenditures (CapEx) or operating expenditures (OpEx) can currently be reported under the above-mentioned environmental objective. Therefore, the entire taxonomy-aligned turnover, capital expenditures (CapEx) and operating expenditures (OpEx) were reviewed for a substantial contribution to the environmental objective "climate change mitigation" using the technical screening criteria.

Biodiversity (BIO) 2.1 Hotels, holiday, camping grounds and similar accommodation

Since 2023, when this activity was introduced, S IMMO has disclosed the eligible share of turnover, CapEx and OpEx arising from hotel operations under this economic activity in their taxonomy disclosures. The turnover from S IMMO's hotel operations are reported under "Income from owner-operated properties" in the consolidated financial statements. Therefore, no disclosures under "BIO 2.1 Hotels, holiday, camping grounds and similar accommodation" are made on consolidated group level.

CCM 7.3 Installation, maintenance and repair of energy efficiency equipment

With regard to economic activity CCM 7.3, meeting the criteria of Directive 2010/31/EU and, if applicable, classification in the two best energy efficiency classes according to Regulation (EU) 2017/1369 are intended as substantial contributions. To prevent significant harm, a climate risk analysis as applied under CCM 7.7 is required as well as compliance with the generic criteria for Do-No-Significant-Harm (DNSH) to pollution prevention regarding the presence of chemicals. We summarise capital expenditures for the installation of energy-efficient cooling systems under this activity. For 2024, it belonged to replacement of HVAC-equipment in Hungary.

CCM 7.6 Installation, maintenance and repair of renewable energy technologies

Economic activity CCM 7.6 only requires the existence of one of the renewable energy technologies listed for a substantial contribution to climate change mitigation; therefore, heat pumps and photovoltaic systems meet this requirement. A climate risk analysis as applied under CCM 7.7 is required in order to prevent significant harm. We summarise capital expenditure for the installation of heat pumps and of photovoltaic equipment under this activity. For 2024, it applied to the installation of PV-panels in Austria and one heat pump in Hungary.

A taxonomy-aligned share of turnover, capital and operational expenditures was identified for every economic activity described above with the exception of "BIO 2.1 Hotels, holiday, camping grounds and similar accommodation".

Taxonomy alignment of S IMMO Group

S IMMO Group continued to pursue a conservative assessment approach in the 2024 financial year. S IMMO Group is aware that a less stringent interpretation of the criteria by other market participants may possibly lead to significantly higher shares of taxonomy-aligned activities.

Economic Activity "CCM 7.7 Acquisition and ownership of buildings"

Substantial contribution to climate change mitigation (SC)

When reviewing buildings for a substantial contribution to the environmental objective of "climate change mitigation", a distinction was made, in accordance with the technical screening criteria, as to whether the application for a building permit for the respective building was submitted before 31 December 2020.

1. For buildings where an application for a building permit was submitted before 31 December 2020, the first step was to examine whether the energy performance certificate (EPC) of the building shows an energy class. To meet the requirements, the energy performance certificate of the building must show at least energy class A. This assessment method was applied to all countries relevant for S IMMO Group, with the exception of Germany. In addition, we used the following alternative approaches:

For Germany, we used the technical criterium valid for buildings built after 31 December 2020. The primary energy demand (PED) of the building was compared to the nationally defined threshold value for nearly zero-energy buildings undercut by at least 10%.

For the Czech Republic the alternative screening criteria was used: A building was assessed if it ranks among the top 15% of the national or regional building stock in terms of primary energy demand. We applied the thresholds determined in a study of

CEVRE Consultants commissioned by Česká spořitelna in 2024 and recommended by the Czech Green Building Council. This study classifies office buildings of the energy efficiency classes A, B and C (up to primary energy demand of 260 kWh/m²), buildings for accommodation and catering of the energy efficiency classes A, B and C (up to primary energy demand of 375 kWh/m²) as well as retail buildings of the energy classes A, B and C (up to primary energy demand of 545 kWh/m²) as the top 15% of the national building stock.

For Austria, the methodology of the Austrian Green Building Council to prove Class A was applied to selected assets. As in Austria the PEB class threshold is based on residential use with a defined room height, an alternative method with adjusted room heights was developed in collaboration with KPMG, PWC and Deloitte Austria.

Non-residential assets with more than 5,000 m² of usable space were examined for the existence of heating systems, systems for combined space heating and ventilation, air-conditioning systems or systems for combined air conditioning and ventilation with more than 290 kW of power. Where this criterium applies, checks were subsequently carried out to determine whether these assets are efficiently operated and have a continuous monitoring system. Technical documentation of the building management systems, property-/facility-management contracts with respective obligations of the provider and for the first time, certificates according to ISO 50001 were used as evidence. The certificates obtained during 2024 lead to a significant increase in the share of taxonomy-aligned turnover, capital and operational expenditures.

2. For buildings for which the building permit application was submitted after 31 December 2020, it must be verified whether the primary energy demand of the respective building is at least 10% below the national threshold for nearly zero-energy buildings. In addition, it must be determined whether the usable space of the building exceeds 5,000 m². If this is the case, airtightness of the building envelope and thermal integration upon completion as well the global warming potential (GWP) viewed over the entire life cycle must be demonstrated for each phase of the life cycle in addition to the criterion of efficient operation. Since there are currently no life cycle assessments for these properties, taxonomy alignment cannot yet be shown for these assets.

Do no significant harm (DNSH)

In accordance with the requirements of the economic activity "CCM 7.7 Acquisition and ownership of buildings", S IMMO Group conducts a climate risk and vulnerability assessment at the site level in order to prevent significant harm to the environmental objective "climate change adaptation". In doing so, a model with different time horizons between 2040 and 2100 has been used so far assuming the RCP-scenarios 2.6, 4.5, 6.0 and

8.5. A detailed description of the climate risk assessment can be found in section E1 of this report. Appropriate adaptation plans have been drawn up where necessary.

Commission Delegated Regulation (EU) 2021/2139 does not provide DNSH criteria for other environmental objectives for the economic activity CCM 7.7.

The share of turnover, capital and operational expenditures from assets which fulfil the substantial contribution and do no significant harm criteria as described above are disclosed as taxonomy-aligned under the activity CCM 7.7.

Economic activity “CCM 7.3 Installation, maintenance and repair of energy efficient equipment”

Substantial contribution to climate change mitigation (SC)

When evaluating individual measures, it was checked if they comply with the directive 2010/31/EU and if they fall under one of the activities listed in the technical screening criteria. For the 2024 financial year capital expenditures connected to the installation of cooling equipment in Hungary was assessed to fulfil the criteria.

Do no significant harm (DNSH)

The requirements regarding DNSH criteria for climate change adaptation are the same as for activity CCM 7.3. A climate risk and vulnerability assessment was carried out at site level. Thus, the criteria was considered as fulfilled.

To meet the DNSH criteria for the environmental objective “pollution prevention”, the activity has to comply with Appendix C of Annex I to the Commission Delegated Regulation (EU)2021/2139. Based on product data sheets it was verified that this criteria is fulfilled for the selected measures.

Commission Delegated Regulation (EU) 2021/2139 does not provide DNSH criteria for further environmental objectives for the economic activity CCM 7.3.

Economic activity “CCM 7.6 Installation, maintenance and repair of renewable energy technology”

Substantial contribution to climate change mitigation (SC)

To fulfil the substantial contribution criteria under the environmental objective climate mitigation, the individual measure has to correspond to one of the measures listed in the technical screening criteria. Technical specifications are not set. For the 2024 financial year, it was assessed that the installation of PV-Panels Austria fulfils the requirements as well as one heat pump in Hungary.

Do no significant harm (DNSH)

The requirements regarding DNSH criteria for climate change adaptation are the same as for activity CCM 7.3 and CCM 7.7 and CCM 7.3. Thus, the criteria was considered as fulfilled.

Commission Delegated Regulation (EU) 2021/2139 does not provide DNSH criteria for further environmental objectives for the economic activity CCM 7.6.

The share of capital expenditures from single measures which fulfil the substantial contribution and do no significant harm criteria as described above are disclosed as taxonomy-aligned under the activity CCM 7.6.

Minimum safeguards (MS)

In this context, the topics of human rights (including labour and consumer rights), anti-bribery and anti-corruption, taxation and fair competition were addressed. We concluded that the minimum safeguards criteria were fulfilled.

Performance indicators of the EU Taxonomy

Turnover

The proportion of taxonomy-aligned economic activities in total turnover was calculated as the part of net turnover derived from products and services associated with taxonomy-aligned economic activities (numerator), divided by net turnover (denominator), each for the financial year from 01 January 2024 to 31 December 2024. This approach remains unchanged since the year of the first reporting according to Art. 8 of the Taxonomy Regulation.

In accordance with the Delegated Act on Art. 8 of the EU Taxonomy, the turnover KPI is based on the consolidated turnover of S IMMO (see the consolidated income statement in the consolidated financial statements of the 2024 annual report) and relates primarily to rental income and operating costs charged to tenants. The numerator of the turnover KPI is based on the taxonomy-aligned proportion of the economic activity “7.7 Acquisition and ownership of buildings” with reference to making a substantial contribution to the environmental objective “climate change mitigation”.

The segment Germany has been classified as discontinued operation according to IFRS 5. Therefore, the proportion of Turnover and CapEx (maintenance & repair) relating to Germany were excluded from P&L and are also not part of the taxonomy indicators. This led to an increase in the proportion of taxonomy-aligned turnover to 23.9% (2023: 13.03%). For further details please see chapter 2.4 of the consolidated financial statement.

There is no risk of double counting within Turnover KPIs as we are disclosing only the activity CCM 7.7 as aligned for turnover.

Capital expenditures (CapEx)

The key performance indicator capital expenditure (CapEx) is defined as the proportion of taxonomy-aligned capital expenditures (numerator) divided by S IMMO's total capital expenditures (denominator). This approach remains unchanged since the year of the first reporting according to Art. 8 of the Taxonomy Regulation.

The denominator comprises additions to investment property, property under construction, owner-operated property, other tangible assets and intangible assets for the 2024 financial year before depreciation and amortisation and revaluations. In the 2024 financial year, no additions resulting from business combinations which could have been taken into account for the denominator occurred. Our total capital expenditures essentially correspond to the sum of additions including changes in the scope of consolidation in accordance with the statement of changes in fixed assets (see section 3.1.1. of our 2024 annual report's consolidated financial statements). Differences result from including additions to owner-operated property, other tangible assets and intangible assets in the denominator of the CapEx KPI which are not presented separately in the notes. The numerator includes capital expenditures related to assets or processes that are associated with taxonomy-aligned proportions of economic activity 7.7. Here, S IMMO considers capital expenditures that are material to maintaining and performing the economic activity. The principle of allocation here is the generation of external turnover through the economic activity "7.7 Acquisition and ownership of buildings". Consequently, all capital expenditures in taxonomy-aligned properties are considered in the numerator of the performance indicator.

The proportion of taxonomy-aligned CapEx was 0.7% in 2024. The aligned CapEx in 2023 of 41.56% are justified by the acquisition of taxonomy-aligned buildings which was not the case in 2024 as there were no taxonomy-aligned additions in 2024.

Double counting was avoided in a way that all CapEx related to taxonomy-aligned buildings are disclosed under the economy activity CCM 7.7. Only single measures which were identified as taxonomy-aligned and connected to not-aligned buildings are disclosed under CCM 7.3 or CCM 7.6.

In 2024 the numerator of the KPI for aligned CapEx do not include any capital expenditures related to CapEx plan (as defined in Commission delegated regulation (EU) 2021/2178, paragraph 1.1.2.2.)

Operating expenditure (OpEx)

The key performance indicator operating expenditure (OpEx) is defined as the proportion of taxonomy-aligned operating expenditures (numerator) divided by total operating expenditures (denominator). This approach remains unchanged since the year of the first reporting according to Art. 8 of the Taxonomy Regulation. The classification of the operating expenditures can be derived analogously from the categories of capital expenditures.

Total operating expenditures consist of non-capitalised costs that relate to building renovation measures, maintenance and repair as well as any other direct expenditures in connection with the day-to-day servicing of investment property, property under construction and owner-operated property.

The increase in the share of taxonomy-aligned OpEx to 10.3% (2023: 3.8%) is caused by increased expenses for maintenance.

There is no risk of double counting within OpEx KPIs as we are disclosing only the activity CCM 7.7 as aligned for OpEx.

Template: Proportion of turnover from products or services associated with taxonomy-aligned economic activities – disclosure covering year 2024

Financial year 2024	Year		Substantial contribution criteria						
	Code	Turnover kEUR	Proportion of turnover, year 2024 %	Climate change mitigation Y; N; N/EL	Climate change adaptation Y; N; N/EL	Water Y; N; N/EL	Pollution Y; N; N/EL	Circular economy Y; N; N/EL	Bio- diversity Y; N; N/EL
A. Taxonomy-eligible activities									
A.1. Environmentally sustainable activities (taxonomy-aligned)									
Acquisition and ownership of buildings	CCM 7.7	90,934.80	23.9%	Y	N	N/EL	N/EL	N/EL	N/EL
Turnover of environmentally sustainable activities (taxonomy-aligned) (A.1)		90,934.80	23.9%	23.9%	-	-	-	-	-
of which enabling		0	-	-	%	%	%	%	%
of which transitional		0	-	-					
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned)									
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL
Hotels, holiday, camping grounds and similar accommodation	BIO 2.1	76,503.31	20.1%	N/EL	N/EL	N/EL	N/EL	N/EL	EL
Acquisition and ownership of buildings	CCM 7.7	210,215.79	55.2%	EL	EL	N/EL	N/EL	N/EL	N/EL
Turnover of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned) (A.2)		286,719.10	75.3%	55.2%	-	-	-	-	20.1%
A. Turnover of taxonomy-eligible activities (A.1 + A.2)		377,653.90	99.1%	79.0%	-	-	-	-	20.1%
B. Taxonomy-non-eligible activities									
Turnover of taxonomy-non-eligible activities		3,365.01	0.9%						
Total		381,018.91	100%						

The explanations to the footnotes can be found after the template for the proportion of OpEx.

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DNSH criteria (Do No Significant Harm)

DNSH criteria (Do No Significant Harm)								Proportion of taxonomy-aligned (A.1.) or eligible (A.2.) turnover, year 2023	Category "enabling activity"	Category "transitional activity"
Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	%			
Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N			
Y	Y	Y	Y	Y	Y	Y	Y	13.03%	-	-
Y	Y	Y	Y	Y	Y	Y	Y	13.03%		
Y	Y	Y	Y	Y	Y	Y	Y	-	E	
Y	Y	Y	Y	Y	Y	Y	Y	-		T
								20.81%		
								66.13%		
								86.94%		
								99.97%		

Template: Proportion of CapEx from products or services associated with taxonomy-aligned economic activities – disclosure covering year 2024

Financial year 2024	Year		Substantial contribution criteria						
	Code	CapEx	Proportion of CapEx, year 2024	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Bio-diversity
Economic activities		kEUR	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL
A. Taxonomy-eligible activities									
A.1. Environmentally sustainable activities (taxonomy-aligned)									
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	810.44	0.2%	Y	N	N/EL	N/EL	N/EL	N/EL
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	80.33	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL
Acquisition and ownership of buildings	CCM 7.7	2,175.62	0.5%	Y	N	N/EL	N/EL	N/EL	N/EL
CapEx of environmentally sustainable activities (taxonomy-aligned) (A.1)		3,066.39	0.7%	0.7%	-	0	0	0	0
of which enabling		0.0	%	%	%	%	%	%	%
of which transitional		0.0	%	%					
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned)									
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL
Hotels, holiday, camping grounds and similar accommodation	BIO 2.1	211.83	0.0%	N/EL	N/EL	N/EL	N/EL	N/EL	EL
Acquisition and ownership of buildings	CCM 7.7	448,645.68	97.9%	EL	EL	N/EL	N/EL	N/EL	N/EL
CapEx of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned) (A.2)		448,857.51	97.9%	97.9%	0.0%	0.0%	0.0%	0.0%	0.0%
A. CapEx of taxonomy-eligible activities (A.1 + A.2)		451,923.90	98.6%	98.6%	0.0%	0.0%	0.0%	0.0%	0.0%
B. Taxonomy-non-eligible activities									
CapEx of taxonomy-non-eligible activities		6,418.82	1.4%						
Total (A+B)		458,342.72	100.0%						

The explanations to the footnotes can be found after the template for the proportion of OpEx.

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DNSH criteria (Do No Significant Harm)

DNSH criteria (Do No Significant Harm)								Proportion of taxonomy-aligned (A.1.) or eligible (A.2.) turnover, year 2023	Category "enabling activity"	Category "transitional activity"
Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	%			
Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N			
Y	Y	Y	Y	Y	Y	Y	Y	0.25%		
Y	Y	Y	Y	Y	Y	Y	Y	0.00%		
Y	Y	Y	Y	Y	Y	Y	Y	41.31%		
Y	Y	Y	Y	Y	Y	Y	Y	41.56%		
Y	Y	Y	Y	Y	Y	Y	Y	%	E	
Y	Y	Y	Y	Y	Y	Y	Y	%		T
								0.00%		
								58.03%		
								58.03%		
								99.59%		

Proportion of OpEx from products or services associated with taxonomy-aligned economic activities – disclosure covering year 2024

Financial year 2024	Year		Substantial contribution criteria						
	Code	OpEx kEUR	Proportion of OpEx, year 2024 %	Climate change mitigation Y; N; N/EL	Climate change adaptation Y; N; N/EL	Water Y; N; N/EL	Pollution Y; N; N/EL	Circular economy Y; N; N/EL	Bio- diversity Y; N; N/EL
A. Taxonomy-eligible activities									
A.1. Environmentally sustainable activities (taxonomy-aligned)									
Acquisition and ownership of buildings	CCM 7.7	1,079.88	10.3%	Y	N	N/EL	N/EL	N/EL	N/EL
OpEx of environmentally sustainable activities (taxonomy-aligned) (A.1)		1,079.88	10.3%	10.3%	-	0	0	0	0
of which enabling		0	0%	0%	0%	0%	0%	0%	0%
of which transitional		0	0%	0%					
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned)									
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL
Hotels, holiday, camping grounds and similar accommodation	BIO 2.1	4,365,39	41.7%	N/EL	N/EL	N/EL	N/EL	N/EL	EL
Acquisition and ownership of buildings	CCM 7.7	5,031,85	48.0%	EL	EL	N/EL	N/EL	N/EL	N/EL
OpEx of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned) (A.2)		9,397.24	89.7%	48.0%	0%	0%	0%	0%	41.7%
A. OpEx of taxonomy-eligible activities (A.1 + A.2)		10,477.12	100.0%	58.3%	0%	0%	0%	0%	41.7%
B. Taxonomy-non-eligible activities									
OpEx of taxonomy-non-eligible activities		-	0.0%						
Total (A+B)		10,477.12	100.0%						

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DNSH criteria (Do No Significant Harm)

DNSH criteria (Do No Significant Harm)								Proportion of taxonomy-aligned (A.1.) or eligible (A.2.) turnover, year 2023	Category "enabling activity"	Category "transitional activity"
Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	%			
Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N			
Y	Y	Y	Y	Y	Y	Y	Y	3.82%	-	-
Y	Y	Y	Y	Y	Y	Y	Y	3.82%		
Y	Y	Y	Y	Y	Y	Y	Y	%	E	
Y	Y	Y	Y	Y	Y	Y	Y	%		T
								28.22%		
								67.06%		
								95.28%		
								99.11%		

The explanations of the footnotes can be found after of this table.

- (a) The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the section number of the activity in the relevant annex covering the objective, i.e.:

- 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

- (b) Y – Yes, taxonomy-eligible and taxonomy-aligned activity with the relevant environmental objective
 N – No, taxonomy-eligible but not taxonomy-aligned activity with the relevant environmental objective
 N/EL – not eligible, taxonomy-non-eligible activity for the relevant environmental objective

- (c) Where an economic activity contributes substantially to multiple environmental objectives, non-financial undertakings shall indicate, in bold, the most relevant environmental objective for the purpose of computing the KPIs of financial undertakings while avoiding double counting. In their respective KPIs, where the use of proceeds from the financing is not known, financial undertakings shall compute the financing of economic activities contributing to multiple environmental objectives under the most relevant environmental objective that is reported in bold in this template by non-financial undertakings. An environmental objective may only be reported in bold once in one row to avoid double counting of economic activities in the KPIs of financial undertakings. This shall not apply to the computation of taxonomy-alignment of economic activities for financial products defined in point (12) of Article 2 of Regulation (EU) 2019/2088. Non-financial undertakings shall also report the extent of eligibility and alignment per environmental objective, which includes alignment with each of the environmental objectives for activities contributing substantially to several objectives, by using the template below:

2024	Proportion of turnover/total turnover	
	Taxonomy-aligned per objective in %	Taxonomy-eligible per objective in %
CCM	23.9	79.0
CCA	0.0	0.0
WTR	0.0	0.0
CE	0.0	0.0
PPC	0.0	0.0
BIO	0.0	20.1

2024	Proportion of CapEx/total CapEx	
	Taxonomy-aligned per objective in %	Taxonomy-eligible per objective in %
CCM	0.7	98.6
CCA	0.0	0.0
WTR	0.0	0.0
CE	0.0	0.0
PPC	0.0	0.0
BIO	0.0	0.0

2024	Proportion of OpEx/total OpEx	
	Taxonomy-aligned per objective in %	Taxonomy-eligible per objective in %
CCM	10.3	58.3
CCA	0.0	0.0
WTR	0.0	0.0
CE	0.0	0.0
PPC	0.0	0.0
BIO	0.0	41.7

- (d) The same activity may be eligible and not aligned with the relevant environmental objectives.

- (e) EL – Taxonomy-eligible activity for the relevant objective
 N/EL – Taxonomy-non-eligible activity for the relevant objective

- (f) Activities shall be reported in Section A.2 of this template only if they are not aligning to any environmental objective for which they are eligible. Activities that align to at least one environmental objective shall be reported in Section A.1 of this template.

- (g) For an activity to be reported in Section A.1 all DNSH criteria and minimum safeguards shall be met. For activities listed under A2, columns (5) to (17) may be filled in on a voluntary basis by non-financial undertakings. Non-financial undertakings may indicate the substantial contribution and DNSH criteria that they meet or do not meet in Section A.2 by using: (a) for substantial contribution: Y/N and N/EL codes instead of EL and N/EL and (b) for DNSH: Y/N codes.

Nuclear and fossil gas related activities

Row	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		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	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
6.	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

ESRS E1 Climate change

Climate change refers to the long-term alterations in temperature and weather patterns. While some of these changes can occur naturally due to variations in solar activity or significant volcanic events, human activities have predominantly driven climate change since the 1800s, primarily through the combustion of fossil fuels such as coal, oil, and natural gas. The primary greenhouse gases contributing to climate change include carbon dioxide and methane. These gases are released through activities such as burning gasoline for transportation and using coal for heating purposes. Significant sources of methane emissions include agricultural practices and operations related to oil and gas extraction. Key sectors responsible for greenhouse gas emissions include energy production, industry, transportation, buildings, agriculture, and land use.

Greenhouse gases play a crucial role in trapping heat in the atmosphere, leading to substantial alterations in the Earth's climate. These changes significantly affect individuals and whole population, resulting in issues such as water scarcity, increased flood risks, and droughts, all of which have implications for food security. This underscores the important relationship between climate change mitigation, adaptation and water resources (covered in ESRS E3) and biodiversity.

ESRS 2 General disclosures

The operation of buildings, as a key sector of the Group's activity, generates a wide range of emissions, ranging from noise to greenhouse gas emissions (GHG Emissions). Greenhouse gas emissions from the buildings come from fossil fuels burned for heat and the use of gases for refrigeration and cooling in buildings, and from the handling of waste.

Governance

Disclosure requirement related to ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes

(E1.GOV-3_01 to 03)

Please refer to the disclosures under ESRS 2 GOV-3

Strategy

E1-1 – Transition plan for climate change mitigation

(E1-1_01 to E1-1_02)

In 2024, S IMMO under Management of CPI Europe developed a comprehensive Climate Transition Action Plan, which has become an integral part of our operations. Our commitment to developing a Climate Transition Action Plan is driven by the need to comply with evolving regulations, mitigate climate-related risks, and capitalize on new market opportunities. This strategic initiative is essential for ensuring the long-term success and sustainability of CPI Europe in the real estate sector.

The CPI Europe Transition Action Plan lays out the future steps necessary for CPI Europe and S IMMO to reach zero GHG emissions by 2050. Additionally, the pathway of the plan is in line with the 1.5°C goal of the Paris Climate Summit and the legal framework of the EU laid down in the European Green Deal. The analysis and the subsequent presentation of the emission sources were based on the logic of the Greenhouse Gas Protocol. The transition plan incl. the baseline 2019 of CPI Europe relates to the whole group. Therefore, the percentage decarbonisation targets apply equally to S IMMO.

The amounts of GHG emissions are based on a study conducted by NUS Consulting Group UK for the financial year 2019. It reflects an in-depth analysis of CPI Europe GHG emissions and serves as the basis for further considerations. Although CPI Europe saw some significant increase in size due to intra-group transactions with CPI Property Group in 2022 and 2023 the measures and pathways based on the NUS study shall remain valid. The emission reduction plans are set as percentage reductions compared to the baseline year 2019.

As part a of this transition plan, detailed measures were defined which will be incorporated into the company's corporate strategy over the next few years. Some of these measures are already being implemented. With regard to fossil fuels, a replacement of the existing gas heating systems with climate-friendly alternatives was defined.

The decarbonisation paths of the CRREM project were used to determine the targets. These are aligned with the European Union's 2050 target. Measures to reduce these emissions were defined for the individual emission sources. When determining the quantitative reduction, reference was made to what is technically feasible for CPI Europe and to the decarbonisation targets of Science Based Target Initiative (SBTi).

(E1-1_03 and E1-1_04)

As a key action to reduce scope 1 emissions the improvement of building components was identified. This will mostly happen during the regular replacement of the building components. Main areas are the exchange of gas heatings with preferably heat pumps in combination with photovoltaics and the improvement of HVAC units. Regarding scope 2 emissions a significant part of the necessary actions were already implemented. Procurement of green electricity and the conclusion of PPAs are the main actions. The largest part of emissions in S IMMO relate to fuel and energy-related activities in scope 3 due to the energy consumption of tenants. In order to reduce these emissions a multistage plan was implemented to digitalize the buildings and support S IMMO tenants to reduce their energy consumption and increase their profitability.

(E1-1_05 to E1-1_06)

Based on current measures and cost estimates, the gross capital requirements (CapEx) for implementing CPI Europe Transition Action Plan are estimated to be between EUR 255.5m and EUR 424.0m. Most of these financing requirements are already covered by maintenance measures in the coming years.

Expenditures (operational as well as capital) required for implementation of these key actions rely mainly in technology. Technology is crucial in switching to renewable energy, in energy efficiency, but also in new developments. Therefore, the significant CapEx will be required in technology (changing to the low-carbon emission technology, thermal improvements of the buildings). Another significant expenditure, mainly operational expenditures, is related to switching from fossil fuels and non-renewable electricity to renewable sources.

(E1-1_07)

Due to high uncertainty in the calculation methods, a lack of frameworks or guidelines the accurate locked-in GHG emissions from key assets were not calculated.

The buildings are developed for at least 50 years, but in reality, their lifespan is much longer and during this life-span technological system ensures a certain level of emitting emissions from their continued development and use.

GHG emission reduction targets have already been defined and they rely on installing low or zero carbon technologies and using renewable sources. These actions can reduce lock-in GHG emissions because project that generates zero greenhouse gas emissions, has no carbon lock-in GHG emission.

[\(E1-1_08\)](#)

One of the CPI Group targets is to increase EU taxonomy alignment economic activities at a consolidated Group level over time.

For further details please see the taxonomy chapter in this statement.

[\(E1-1_12\)](#)

The Group's Climate Transition Action Plan outlines various objectives and strategies aimed at achieving a reduction in emissions in line with the 1.5C goal of the Paris Agreement. Our main emphasis during 2025 and into the 2030s will be directly reducing emissions rather than relying on offsetting measures.

[\(E1-1_13\)](#)

The Climate Transition Action Plan is influenced by climate-related risks and opportunities. Recognizing our business' unique constraints and opportunities, we have tailored our sustainability objectives to be ambitious as well as achievable. This commitment extends across our entire value chain and is informed by a comprehensive double materiality assessment. This process identifies and prioritizes the ESG issues most relevant to our stakeholders and potential business impacts, aligning our strategy with stakeholder expectations and broader societal goals. Through this approach, we aim to create lasting value for our stakeholders and contribute to a sustainable future.

The measures defined in the transition plan have been incorporated into the company's budgeting process for upcoming years as strategic targets. Each year, the company invests significant amounts in the maintenance of its building stock. The existing financing requirement (CapEx) can be covered to a large extent by these annual budget funds. In addition, the implementation of most strategic goals is planned with the respective necessary replacement of building components.

[\(E1-1_14\)](#)

The Climate Transition Action Plan was approved by the ESG Committee of CPI Europe's Supervisory Board.

[\(E1-1_15\)](#)

As the transition plan was approved in 2024, the first evaluation of progress will be part of the next reporting period.

Disclosure Requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

[\(E1.SBM-3_01 to 07\)](#)

S IMMO has conducted a comprehensive assessment of Physical Climate Risks for all properties, both at the portfolio level and on an individual building basis. We evaluate climate risk with an external tool provided by ESG Software Climcycle, which is specifically designed and validated for this type of assessment.

The Physical Climate Risk module of the platform assesses potential risks by analysing a range of climate scenarios, utilising high-resolution projections and data from authoritative sources such as Copernicus and ISIMIP. The climate risk model projections are generated using open-access data sources, as recommended in the EU Taxonomy legislative text. This includes services like Copernicus, which employs the latest technology. Currently, the tool can identify 18 physical risks, both acute and chronic. The data is accessible at varying levels of detail. Furthermore, each risk includes up to four RCP scenarios with projections extending to the year 2100.

For activities with a projected lifespan of less than a decade, the assessment is conducted using climate projections at the most suitable minimal scale. For all remaining activities, the evaluation is executed using the most refined resolution available, employing cutting-edge climate projections across the full spectrum of future scenarios that align with the activity's expected lifespan.

This module systematically identifies and evaluates physical climate risks, offering valuable insights for developing effective mitigation and adaptation strategies. Furthermore, this tool is designed to comply with EU Taxonomy regulations and to evaluate risks based on Representative Concentration Pathway (RCP) scenarios, thereby facilitating informed long-term investment decisions.

For the entire Group's portfolio, we have conducted a two-tiered analysis resulting in two sets of findings. The first set is an aggregate evaluation for the entire company, for the years 2030 and 2050 based on the requirement of ESRS Regulation (EU) 2021/1019, highlighting which risks are frequently assessed as high within our portfolio. The prominent risks identified were water stress, heat stress and river floods. The second set provides an individual evaluation for each building. As a part of the individual evaluation for each asset with the high risks, possible adaptation solutions are listed that can be implemented to mitigate the risk. These adaptation solutions will be evaluated separately for each single asset. The adaptation solutions must be implemented within the next five years, in order to meet the EU Taxonomy criteria.

Impact, risk and opportunity management

Disclosure requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities

Management approach

Material impacts, risks and opportunities	(1) GHG emissions generated from building
	(2) Consumption of energy
	(3) Increased cost of fossil fuels resources
	(4) Carbon pricing mechanism
	(5) Non-compliance with ESG targets lead to loss in investors confidence
	(6) Inadequate adaptation solutions
Policies (E1-2)	Code of Business Ethics and Conduct
	Group Policy Environment and CSR
	Group LCA policy
	CPIPG GHG Recalculation Policy
	Risk Management Policy
	Transition plan ESG
Targets	32.7% reduction in GHG intensity of property portfolio, incl. bioenergy, by year 2030 versus 2019 baseline
	Purchase of electricity exclusively from 100% renewable sources by year-end 2024
	10% reduction in energy intensity of property portfolio by year 2030 versus 2019 baseline
	Increase in EU Taxonomy alignment of economic activities at consolidated Group level over time
	Alignment of Executive Board remuneration to ESG criteria
Key actions	Detailed description under E1-3

(E1.IRO-1_01-16)

The process for identifying and assessing climate-related impacts, risks, and opportunities is outlined in ESRS 2, specifically in the section regarding the double materiality assessment. Both physical and transition climate-related impacts, risks and opportunities have been taken into account. The identified material climate-related impacts, risks, and opportunities are described in detail in the Materiality and Target table of ESRS 2, SBM-1.

The Group has identified climate-related hazards over the short, medium and long-term period defined in ESRS 2 and assessed whether its assets and business activities may be exposed to these hazards. Both chronic and acute climate-related hazards have been taken into account. For the entire Group's portfolio, we have conducted a two-tiered analysis resulting in two sets of findings. The first set is an aggregate evaluation for the entire company, highlighting which risks are frequently assessed as high within our portfolio. The second set provides an individual evaluation for each building.

The Group has identified the following risk, which has been determined to be non-material:

- Operational costs and adaptation measures due to chronic weather conditions: Financial losses can arise for the company from unnecessarily high operating costs and from the significant loss in value of the property. According to the Climate Risk Assessment, water stress and heat stress have been identified as the primary risks. The assessment indicates that 8 of our buildings in Bucharest, Romania are situated in areas with a high risk of heat and water stress, which represents a portfolio value of EUR 535.1m.

In analysis scenarios of Representative Concentration Pathways (RCPs) as follows have been used.

- RCP 2.6: A stringent mitigation scenario aiming to keep global warming likely below 2°C.
- RCP 4.5: An intermediate scenario likely resulting in 3.0°C global warming.
- RCP 6.0: Projections for temperature according to RCP 6.0 include continuous global warming making the global temperature rise by about 3-4°C by 2100.
- RCP 8.5: Under this scenario, which is often referred to as a high-emissions or "business as usual" scenario, the expected temperature increase is about 4.3°C by 2100, relative to pre-industrial temperatures.

However, it is important to note that there are uncertainties and debates about the assumptions and outcomes of this scenario. The implications of these scenarios are evaluated per decade for all operations.

The Group has identified its journey for the particular RCPs:

- RCP 2.6: Operating efficiency improvements; Energy efficient CapEx; New developments complying with EU Taxonomy and net zero energy building regulation; Diversification of the energy sources; Reduction in water intensity of property portfolio.

- RCP 4.5: Switching electricity from fossil fuel to renewable sources; Diversification of the energy sources (on-site power generation from non-renewable and renewable sources); Engaging with occupants, educating and cooperating with them on reducing CO₂ emissions; Deeply involving our supply chain in our environmental strategy.
- RCP 6.0: The diversification of energy sources through on-site power generation utilizing both renewable sources; Enhancing collaboration with partners across the value chain - both upstream and downstream - to work together on reducing greenhouse gas emissions.
- RCP 8.0: Identification of priority locations to focus on in the next phases and evaluate our buildings, whether they may directly and/or indirectly cause impacts; Adaptation measures incorporated in our buildings in the portfolio (measures include water, climate and biodiversity issues); No capital or operational expenditure is linked to activities that contribute to fossil fuel expansion.

The scenarios, journeys and green measures identified are considered during the financial assessment as a part of the risk evaluations and calculations employed.

The following climate-related transition risks and opportunities in the Group's operations and along the upstream and downstream value chain have been considered:

- Current and emerging regulations
- Technology: S IMMO continually explores building technologies designed to improve environmental performance. Evaluation of new technologies is part of the Group's decision-making process regarding refurbishments and developments.
- Market: Investors are increasingly focused on climate mitigation investments. In 2022 CPI Property Group developed a sustainable finance framework combining both sustainability-linked bond framework and green bond framework under which the Group has committed to use proceeds from green bonds to finance or refinance existing or future projects that improve the environmental performance of CPI Property Group's property portfolio and contribute to the Group's climate impact mitigation objectives. The Group recognizes that managing environmental risks can directly impact the value of its portfolio.
- Reputation: S IMMO believes that environmental performance is critical for the group's reputation on the market.

These factors were taken into account during the double materiality assessment, which identified the following risks as material and detailed in Materiality and Target table of ESRS 2, SBM-1.

- Risk of increased cost of fossil fuels resources
- Carbon pricing mechanisms
- Market reputation and investor confidence
- Financial penalties
- Adaptation assessment and implementation risk

E1-2 – Policies related to climate change mitigation and adaptation

See further information under ESRS 2 MDR-P

E1-3 – Actions and resources in relation to climate change policies

(E1-3_01)

Following actions and steps are being carried out to mitigate the effects of climate change in accordance to the Climate Transition Action Plan of CPI Europe AG:

- Replacing refrigerants by low GWP refrigerants
- Gradual replacement of the HVAC units and refrigerators with products that use alternative coolants with little or no GWP. The new cooling system was used for the Twin Towers in Vienna, which uses ammonia (GWP 0).
- Change of heating to heat pumps
To eliminate the effect of GHG emissions caused by stationary combustion two measures have been identified. Firstly, the technological change in building operating requires the exchange of existing gas heating against heat pumps. However, such exchange also requires other construction measures to be implemented like changing the diameter of the heating pipes. Therefore, as interim solution also a switch to a renewable energy source like biomass, wood or pellets might be appropriate.
- Thermal improvement of the buildings
Future buildings need to fulfil significantly higher standards of energy efficiency. This will require a complete refurbishment of existing buildings. Thermal insulation will contribute substantially to a reduced energy demand and therefore less heating demand, which equals less natural gas consumption.
- Change to BEVs powered with CO₂ free electricity
Meanwhile the automotive industry offers a wide variety for battery based electric vehicles that in combination with low emission electricity significantly reduce the GHG emissions from individual traffic. Therefore, a quick change to a fully electrified car fleet is proposed. This allows a significant

reduction of related GHG emissions and a quick win for the emission reduction plan.

- **Change to CO₂ free heating source by service provider**
We rely on the efforts of district heating providers to reduce greenhouse gas emissions from district heating. These providers are subject to the same regulations and must therefore also meet the climate targets. We are convinced that district heating is a sensible energy source for urban areas, especially if it is generated in a climate-neutral way.

- **Green electricity purchase by PPA**
Due to the price distortions on the electricity market due to the war in Ukraine and the interpretation of possible regulations, S IMMO has decided to purchase electricity via PPAs. In Austria, a PPA has already been concluded with a small hydropower plant to supplement the company's own production. In addition to the purchase of green electricity, the PPA also offers planning security with regard to cost development.

- **Purchase of CO₂ free electricity/ green energy from the market**
From a strategic point of view, S IMMO does not aim to produce electricity for the market. As a result, there will always be a need to purchase a residual amount on the market. CPI Europe has set itself and S IMMO the goal of only purchasing green electricity from the end of 2024. Compensation by means of CO₂ certificates or guarantees of origin is no longer permitted.

- **Roll out of PV plants on S IMMO buildings**
The NUS study also examined the potential for electricity generation using PV systems on properties. Using the available roof space, it was determined that up to 130 GWh of electricity could potentially be generated on group level. The total electricity consumption at that time was determined to be 236.2 GWh, which means that around 55% of electricity consumption can be covered by self-generated green electricity on group level.

- **Green procurement**
To reduce emissions from purchased goods and services a change in the procurement policy is necessary. Procurement decisions should be based on sustainability criteria, rather than the cheapest offer. The entire life cycle of the procured goods or services should be considered, independently of sustainability.

- **Further following measures should be implemented to reduce emissions**
 - Purchased raw materials are from low GHG-emitting and sustainable sources.

- Purchases from suppliers committed to reducing CO₂ emissions/net zero targets.
- Prioritisation of local suppliers in order to reduce the supply chains associated with the purchase of goods and services.
- Purchases of goods and services that have a sustainability certificate.
- Inclusion of the repair option for goods in the decision-making catalogue. Repairs result in lower GHG emissions than new purchases.

- **Green development**
In the area of real estate development in particular, there is not only a need to design processes emission-free, but also to redesign the products. This also arises from the background of increased requirements for building emissions and energy efficiency.

- **The following steps are considered for reducing GHG emissions:**
 - Implement the life cycle assessment (LCA) policy for the construction and operation of all new commercial properties.
 - When selecting and planning, pay attention to materials with low CO₂ emissions. When constructing new buildings, the highest available standards for low-CO₂ construction are met.
 - When purchasing new buildings or renovating existing properties, aim for the highest available energy efficiency standards.
 - For the procurement of machinery, technical equipment and vehicles, the highest available EU/national energy efficiency standards must be respected.
 - Prioritise the purchase of equipment/buildings based on life-cycle costs/CO₂ emissions/energy consumption to ensure that the procurement is the most efficient option (even if the initial costs are higher).

■ Cooperation with tenants to reduce consumption by consumption-based billing

A roadmap covering several years is required save the majority share of emissions. The individual steps are presented below:

- Recording actual consumption data at tenant level. The first step is to record actual consumption of utilities. This is done by means of electronic metering (smart meter).
- Change in the operating cost allocation from square-meter-based keys to consumption-based calculation. This means that the economic costs of the cause are also charged to the corresponding tenant.
- Active communication of consumption data to the tenant. The aim is to create awareness of actual consumption. A notification system for operating errors in the building services can also be integrated with relatively little effort. The advantage for S IMMO is that falling operating costs mean lower subsidies from the landlord or potential for rent increases.
- Tenants in refurbished buildings should achieve almost emission-free operation of the buildings, in line with the EBPD requirements.

■ Reducing logistic efforts, local procurement

The following measures to reduce related GHG emission have been identified:

- Ensure that all necessary transportation and distribution services are procured from suppliers with a fleet with low/no CO₂ emissions.
- Prioritise suppliers that use biofuels or low-carbon fuels in their fuel mix for transportation and distribution services.
- Prioritising distribution activities that use on-site renewable electricity for the storage of purchased goods in warehouses, distribution centres and retail stores, or procuring the necessary power supply from 100% renewable certified energy sources.
- Strategic siting of new buildings close to major customers and consumption centres.
- Reduction of greenhouse gas intensity (tCO₂e/km) by improving the efficiency of transport networks, increasing return trips, loading capacity and load factors.

■ Waste reduction and increase recycling/circular economy
Possible measures for reducing greenhouse gas emissions include:

- Reduce the amount of waste by implementing special waste disposal programmes/training for staff to increase the reuse and recycling rates in all buildings.
- Improved recycling and reuse measures in commercial buildings to reduce the amount of waste going to landfill.
- Conduct waste audits across the commercial portfolio to optimise waste streams, reduce contamination of materials and drive improvements in recycling rates/landfill.
- In procurement, ensure waste management companies offer a 'zero landfill' option to reduce greenhouse gas emissions associated with landfill.
- Registering commercial space with reuse tool/software providers so that surplus/unneeded products can be re-used by local organisations, eliminating the need for recycling/disposal.

■ Switch to green forms of transport

The following measures are conceivable for reducing emissions associated with business travel:

- Reducing the need for business travel across the organisation (e.g. promoting video conferencing and web-based meetings as an alternative to in-person meetings where economically feasible)
- Adopting an updated procurement policy that requires all business travel providers to demonstrate a verified net-zero target.
- Introduction of a company-wide policy to ensure the installation and availability of charging stations for electric vehicles on company premises.
- Promoting and incentivising lower-emission travel options (e.g. train instead of plane), introducing guidelines to promote incentives for active travel and public transport for shorter trips to customer appointments;
- Providing active travel/zero-carbon options for employees to perform their everyday tasks that require travel within the region, e.g. providing bikes for employees to travel to meetings/business appointments within the region.

■ Employee commuting

Ensure that the purchase of new commercial real estate considers sustainable travel options for employees to reduce commuting distances, e.g. by requiring that acquired properties be located near city centres and public transport to limit the average daily commute for employees.

- Optimising the use of active/carbon-free travel options by employees and discouraging the use of personal cars for daily commuting, e.g. by introducing parking policies and charges across the commercial portfolio to make carbon-free travel options more attractive.
- Provide incentives and support for company-led programmes to increase the use of public transport, e.g. programmes to promote cycling to work, 'job ticket'.
- Evaluate the feasibility of work-from-home policies and initiatives (where economically feasible) and increase the provision of communication tools/home office tools to reduce employees' daily commute.
- Provide carbon-neutral/active transportation infrastructure for employees across the commercial portfolio (e.g. electric vehicle charging points, bicycle parking).
- Introduce company policies and programmes to reduce single occupancy car trips to work, e.g. by promoting carpooling.

■ Focus on green investments

As emissions reduction measures concerning the category 'Investments' the following points were considered:

- Introduction of guidelines to ensure that commercial investments are only made in companies with decarbonisation targets that are aligned with CPI Europe Group net-zero target by 2050.
- All companies in which S IMMO invests must regularly report their Scope 1 and Scope 2 emissions to demonstrate annual/continuous decarbonisation.
- Future investments will be targeted towards companies that directly support and promote the transition to a low-carbon economy.
- Proactive engagement with all companies to ensure alignment and verification with the SBTi.

(E1-3_03, E1-3_04)

Decarbonization measure

Scope	Decarbonization measure	Unit	Baseline					
			2019	Target 2030	Target 2035	Target 2040	Target 2045	Target 2050
1.1	Replacing refrigerents by low GWP refrigerents	t CO ₂ e	5,709	-1,019	13,615	6,490	1,710	345
1.2	Change of heating to heatpumps	t CO ₂ e	3,211	-1,156	-3,164	-4,880	5,294	5,570
1.2	Thermal improvement of the buildings	t CO ₂ e	227	-1,734	-1,220	-1,272	-1,284	-1,284
1.3	Change to BEVs powered with CO ₂ free electricity			-227	-1,830	-1,907	-1,927	-1,927
2.1	Change to CO ₂ free heating source by service provider	t CO ₂ e	6,254	-3,127	-227	-227	-227	-227
2.2	Own electricity production through PVs	t CO ₂ e	42,499	-3,000	-3,909	-4,534	-6,254	-6,254
2.2	Green electricity purchase by PPA	t CO ₂ e		-250	-12,000	-16,000	-16,000	-16,000
2.2	Purchase of CO ₂ free electricity from the market	t CO ₂ e		-39,024	-1,000	-2,500	-7,500	-10,000
3.1	Green procurement	t CO ₂ e	9,086	-7,269	-29,274	-23,774	-18,999	-16,499
3.2	Green development	t CO ₂ e	24,208	-19,366	-8,632	-8,995	-9,086	-9,086
3.3	Cooperation with tenants to reduce consumption by consumption-based billing	t CO ₂ e	205,076	-167,616	-200,974	-204,256	-205,076	-205,076
3.3	Reducing logistic efforts, local procurment	t CO ₂ e	16,532	-14,879	-15,705	-16,367	-16,532	-16,532
3.4	Switching to green energy	t CO ₂ e	28	-14	-25	-25	-28	-28
3.5	Increase recycling/circular economy	t CO ₂ e	1,697	-255	-891	-1,145	-1,209	-1,209
3.5	Waste reduction	t CO ₂ e		-85	-297	-382	-403	-403
3.6	Switch to green forms of transport	t CO ₂ e	281	-267	-267	-267	-281	-281
3.7	Job ticket, bikes,...	t CO ₂ e	1,020	-714	-1,010	-1,020	-1,020	-1,020
3.15	Focus on green Investments	t CO ₂ e	6,122	-6,122	-6,122	-6,122	-6,122	-6,122

(E1-3_05-08)

For the disclosures required by Commission Delegated Regulation (EU) 2021/2178 please see the taxonomy-chapter of this statement.

Metrics and targets

E1-4 – Targets related to climate change mitigation and adaptation

(E1-4_01)

The following targets have been set on group level:

- A 46.2% reduction in GHG intensity of Scope 1 and Scope 2 of the property portfolio by the year 2030 versus 2019 baseline
- A 32.7% reduction in GHG intensity of property portfolio, incl. bioenergy, by year 2030 versus 2019 baseline
- Purchase of electricity exclusively from 100% renewable sources by year-end 2024.
- 10% reduction in energy intensity of property portfolio by year 2030 versus 2019 baseline

(E1-4_02 to 17)

Expected GHG emission reductions of CPI Europe (including S IMMO)

GHG emissions	Unit	Retrospective				Milestones and target years		
		Base year 2019	2023	2024	%	2025	2030	Annual % target/ base year
Scope 1 GHG emissions								
Gross Scope 1 GHG emissions	t CO ₂ e	9,147	18,714	17,686	-5.5	8,494	5,011	0.6%
Scope 2 GHG emissions								
Gross location-based Scope 2 GHG emissions	t CO ₂ e	51,585	15,567	20,911	34.3	n/a	n/a	n/a
Gross market-based Scope 2 GHG emissions	t CO ₂ e	48,753	15,517	22,615	45.7	9,237	3,352	-7.4%
Significant Scope 3 GHG emissions								
Total gross indirect Scope 3 GHG emissions	t CO ₂ e	264,049	182,004	216,864	19.5	255,775	47,464	-7.5%

CO₂ emissions are calculated according to the GHG Protocol based on the principle of operational control. The reported CO₂ emissions represent gross emissions. The CO₂ equivalents for all greenhouse gases from the Kyoto Protocol (CO₂, CH₄, N₂O, HFKW, PFC, SF₆ and NF₃) were considered in the calculation. Scope 3 greenhouse gas emissions include all categories with the exception of 3.8, 3.9, 3.10, 3.12 and 3.14.

(E1-4_18)

In 2023, GHG reporting was harmonised within CPI Property Group, including CPI Europe and S IMMO. Since then, calculation of all environmental KPIs is performed by CPI Property Group. Due to this harmonisation, consistent conversion factors were used to calculate the previous year's emission values. This leads to deviations in the CO₂ emissions that have already been published.

Since 2018, CPI Property Group has been working closely with the University Centre for Energy Efficient Buildings (UCEEB) of the Czech Technical University in Prague (CTU). UCEEB is as a technical support provider and adviser to the Group, supporting the Group in establishing and quantifying the Group's environmental targets as part of the Group's long-term strategy 2024 reporting period UCEEB provided data control.

CPI Property Group (including S IMMO) has developed and continuously enhanced its Environmental Impact Reporting Tool (ERT) for data collection and putting into the database. CPI Property Group's objective is to ensure the detail, accuracy and quality of our environmental performance reporting. The ERT allows disclosure across the Group and all its segments, despite the diversity of our portfolio.

The ERT is tailored to report in-line with GHG Protocol, with the help of an independent third party, the CI3 organisation. Since 2020, we expanded the scope of the Group's collection, monitoring and reporting of GHG emissions and all relevant categories of scope 3 are now measured and disclosed. So, our reporting is aligned with the GHG Protocol.

ERT and database solutions enable the monitoring of the Group's environmental performance through greater robustness, scope (activity and geography), efficiency and automation. For our purposes, the environmental Power BI is utilised due to its efficient ability to track and analyse performance across multiple levels (site, segment, region and Group) on a regular basis, assess results against targets and implement suitable corrective measures. Power Bi was also utilised for developing key figure tables and performance indicators in accordance with current guidelines of the European Sustainability Reporting Standards (ESRS).

CPI Property Group's GHG reporting (including S IMMO) has been verified by CI2 as complying with the GHG Protocol Corporate Standard. Since 2019, the Group has been in cooperation with CI2, and since 2021 with its sister company CI3. The CI3 company focuses on issues related to the carbon footprint, its reporting, verification and setting targets to reduce it. CI3 is a regional partner for CDP reporting. Through the review process, CI3 advised on the compatibility with the GHG Protocol Corporate Standard and compatibility with CDP reporting standards.

CI2 acts as a third-party and monitors, reviews, and independently validates the Group's GHG disclosures and methodology used. As the result of this cooperation, CPI Property Group's GHG footprint (including S IMMO) was verified, confirmed according to the procedures defined in the GHG Proto-

col and awarded CI2 conformity certificate. Recommendations and guides were prepared and will be incorporated into subsequent environmental reporting.

(E1-4_20, E1-4_21)

S IMMO ensures that the 2019 baseline is representative by adjusting it through a standardised calculation method that considers portfolio changes. This method also involves continuous monitoring of any structural changes to assess whether further adjustments to the baseline are necessary.

This allows for continued tracking against the original target while reflecting portfolio and structural changes. This process ensures that progress toward greenhouse gas reduction goals remains consistent and representative of real changes within the company's activities and external influence.

(E1-4_22)

The CPI Europe's GHG emissions intensity reduction target has been developed as science-based, aligned with the Paris Agreement climate goals to limit the global temperature increase versus pre-industrial levels at 1.5°C.

In CPI Europe's Climate Transition Action Plan various objectives and strategies are set aimed at achieving a reduction in emissions in line with the 1.5°C goal of the Paris Agreement, from climate change perspective:

- A 73.9% reduction in GHG intensity of Scope 1 and Scope 2 of the property portfolio by the year 2030 versus 2019 baseline
- A 71.7% reduction in GHG intensity of property portfolio, incl. bioenergy, by year 2030 versus 2019 baseline

For a detailed description of the decarbonization levers please see section E1-1 of this statement

(E1-4_24)

Climate risk analysis

Based on the four pillars of the Task Force on Climate-related Financial Disclosures (TCFD) and in accordance with the requirements of the EU Taxonomy Regulation, S IMMO carried out climate risk analyses as described in E1.IRO-1_01-16.

E1-5 – Energy consumption and mix

E1-5_01 to E1-5_23

Energy consumption and mix (inside the organisation)	Unit	Baseline 2019	Total		Austria	
			2024	2023	2024	2023
(1) Fuel consumption from coal and coal products	MWh		0.00	0.00		
(2) Fuel consumption from crude oil and petroleum products	MWh	2,111.67	354.29	493.86	0.00	28.54
(3) Fuel consumption from natural gas	MWh	46,312.29	51,469.65	49,451.65	2,455.23	2,343.63
(4) Fuel consumption from other fossil sources	MWh		0.00	0.00		
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	MWh	53,540.50	41,914.10	31,531.13	14,293.74	9,611.50
(a) electricity	MWh	25,441.54	13,415.12	3,174.68	35.67	2.17
(b) heat and cooling	MWh	28,098.96	28,498.97	28,356.45	14,258.07	9,609.33
(6) Total fossil energy consumption (calculated as the sum of lines 1 to 5)	MWh	101,964.46	93,738.03	81,476.64	16,748.97	11,983.68
Share of fossil sources in total energy consumption	%	91.2	62.0	61.6	43.6	48.1
(7) Consumption from nuclear sources	MWh		6,023.45	1,597.13		
Share of consumption from nuclear sources in total energy consumption	%		4.0	1.2		
Total non-renewable energy consumption outside the organisation (Scope 3.8, 3.13 and 3.14)	MWh	92,506.45	78,755.69	61,342.12	9,616.48	12,146.03
(8) Fuel consumption from renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	MWh					
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	9,835.58	50,511.02	49,020.49	21,459.72	12,827.32
(a) electricity	MWh	9,835.58	50,511.02	49,020.49	21,459.72	12,827.32
(b) heat and cooling	MWh					
(10) Consumption of self-generated non-fuel renewable energy	MWh	31.00	876.29	257.00	250.01	113.68
(11) Total renewable energy consumption (calculated as the sum of lines 8 to 10)	MWh	9,866.58	51,387.31	49,277.49	21,709.74	12,941.00
Share of consumption from renewable sources in total energy consumption	%	8.8	34.0	37.2	56.4	51.9
Total renewable energy consumption outside the organisation (Scope 3.8, 3.13 and 3.14)	MWh	1,385.82	53,537.84	47,736.56	7,629.37	4,411.55
Total energy consumption (calculated as the sum of lines 6, 7 and 11)	MWh	111,831.04	151,148.79	132,351.26	38,458.71	24,924.68
Total energy consumption inside and outside the organisation	MWh	205,723.31	283,442.32	241,429.94	55,704.56	41,482.25
Self-generated non-renewable energy production	MWh	402.23	0.00	221.10	0.00	0.00
Self-generated renewable energy production	MWh	121.64	976.19	432.43	349.91	289.11

Energy intensity	Unit		Total		Austria	
			2024	2023	2024	2023
Total energy consumption from activities in high climate impact sectors per net turnover from activities in high climate impact sectors	MWh/€ m	977.63	696.11	717.56	596.20	553.38
Net turnover from activities in high climate impact sectors	€ m	210.43	407.18	336.46	93.43	74.96
Total energy consumption inside and outside the organisation per total reference gross leasable area	MWh/m ²	0.22	0.19	0.18	0.22	0.21
Total reference gross leasable area	m ²	947,547.53	1,464,202.45	1,369,268.20	248,833.21	198,509.47

Methodology applied**Boundaries of reporting – landlord and tenant utility consumption**

Data for the water and energy consumption are either acquired directly from water and energy suppliers or meters or from

tenants in case the tenants have direct relationship with water and energy suppliers. If the data from tenants was not provided, it was estimated based on comparative values specific to the building. Energy and water consumption is split between inside the organization (containing consumption related to own operations) and outside the organization (containing consump-

	Germany		Hungary		Czech Republic		Romania		Slovakia		Croatia	
	2024	2023	2024	2023	2024	2023	2024	2023	2024	2023	2024	2023
	329.84	454.69	9.57	9.69	4.94	0.94	9.94	0.00				0.00
	7,877.85	14,222.81	19,798.65	20,837.48	13,102.01	3,402.99	3,191.97	3,140.05	4,392.00	4,526.80	651.93	977.89
							0.00	0.00				
	10,286.14	15,636.69	2,060.83	2,743.33	12,889.96	2,999.03		0.00	155.51		2,227.92	540.57
	1,286.72	507.67			9,920.56	2,664.84		0.00	155.51		2,016.66	0.00
	8,999.42	15,129.03	2,060.83	2,743.33	2,969.39	334.20					211.26	540.57
	18,493.83	30,314.19	21,869.06	23,590.50	25,996.90	6,402.96	3,201.91	3,140.05	4,547.51	4,526.80	2,879.85	1,518.46
	99.8	94.1	52.7	55.0	77.1	80.1	29.4	22.0	87.8	91.6	100.0	29.6
	29.74	32.07			5,758.48	1,565.06		0.00	235.22		0.00	0.00
	0.2	0.1			17.1	19.6		0.0	4.5		0.0	0.0
	15,867.98	29,805.72	3,338.34	2,827.60	31,212.69	4,547.39	9,533.08	7,504.62	6,336.41	1,627.26	2,850.71	2,883.52
	0.90	1,861.42	19,339.45	19,150.80	1,962.10	30.16	7,668.50	11,115.03	80.36	417.63		3,618.14
	0.90	1,861.42	19,339.45	19,150.80	1,962.10	30.16	7,668.50	11,115.03	80.36	417.63		3,618.14
	0.00	0.00	278.22	113.77		0.00	29.40	29.55	318.66			0.00
	0.90	1,861.42	19,617.67	19,264.57	1,962.10	30.16	7,697.89	11,144.58	399.02	417.63		3,618.14
	0.0	5.8	47.3	45.0	5.8	0.4	70.6	78.0	7.7	8.4		70.4
	0.00	0.00	15,831.50	16,477.36	2,902.15	68.91	26,709.05	18,755.36	465.77	5,776.65		2,246.74
	18,524.47	32,207.68	41,486.72	42,855.07	33,717.48	7,998.19	10,899.80	14,284.63	5,181.75	4,944.42	2,879.85	5,136.60
	34,392.45	62,013.40	60,656.56	62,160.02	67,832.33	12,614.48	47,141.93	40,544.60	11,983.92	12,348.33	5,730.56	10,266.85
	0.00	221.10				0.00						0.00
	0.00	0.00	278.22	113.77		0.00	29.40	29.55	318.66			0.00
	Germany		Hungary		Czech Republic		Romania		Slovakia		Croatia	
	2024	2023	2024	2023	2024	2023	2024	2023	2024	2023	2024	2023
	1,314.39	1,267.99	556.82	587.67	733.14	747.75	716.52	638.64	782.55	796.82	1,152.10	936.33
	26.17	48.91	108.93	105.77	92.52	16.87	65.79	63.49	15.31	15.50	4.97	10.97
	0.16	0.16	0.18	0.18	0.22	0.19	0.22	0.19	0.10	0.11	0.22	0.21
	214,448.79	383,292.08	341,894.40	340,684.18	304,615.27	67,667.53	213,013.28	214,553.85	114,975.23	114,980.63	26,422.27	49,580.46

tion related to our downstream value chain, i.e. tenants' consumption).

Energy consumption

The objective was to use actual data for all types of consumption (fuel, electricity, district heating, water) and waste generated

for the twelve-month period. To this end, automatically transmitted data (smart metering), read-out data and data from utility company invoices were used. Where no complete data was available, consumption was estimated using appropriate assumptions-based building type and lettable space. Where no data was available for the full year 2024, data from 2023 was

used. The energy consumption of buildings and acquired or sold during the year was considered for the full months in which these buildings were a part of the portfolio.

Normalisation

For the intensity indicators (energy intensity, water intensity, CO₂ intensity) the reference total area of the buildings used as denominator. In addition to the total lettable area of properties that formed part of the portfolio throughout the year, the total lettable area of properties that were purchased or sold during the year were normalised on a monthly basis so that the area is equivalent to the number of months relevant for the report on a pro rata basis. The intensity calculated contains the consumption obtained as described above.

E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions Gross Scope 1, 2 and 3 GHG emissions and total GHG emissions

(E1-6_01 - E1-6_04, E1-6_07, E1-6_09 - E1-6_13, E1-6_33 - E1-6_34)

In 2024 we register a slight increase of our greenhouse gas emissions (market-based) by 2.43% in comparison with the 2019 baseline. This is mainly due to the fact that no green electricity was purchased in the Czech Republic for the reporting year. With the purchase of green electricity in the coming year, a significant reduction in greenhouse gas emissions is expected.

GHG emissions	Unit	Base year 2019	Total			Austria	Germany
			2023	2024	%	2024	2024
Scope 1 GHG emissions							
Gross Scope 1 GHG emissions	t CO ₂ e	11,001.12	11,540.84	11,694.21	1.3	763.69	1,673.55
Scope 2 GHG emissions							
Gross location-based Scope 2 GHG emissions	t CO ₂ e	13,478.83	4,518.43	12,231.26	170.7	928.71	711.28
Gross market-based Scope 2 GHG emissions	t CO ₂ e	14,966.54	5,872.96	12,982.05	121.0	600.42	1,532.46
Significant Scope 3 GHG emissions ("market-based")							
Total gross indirect Scope 3 GHG emissions	t CO ₂ e	56,153.80	43,814.81	59,440.92	35.7	2,129.14	13,056.10
1. Purchased goods and services	t CO ₂ e	2,129.54	3,555.21	3,980.25	12.0	319.21	169.77
2. Capital goods	t CO ₂ e	8,510.73	2,416.75	1,997.30	(17.4)	153.49	78.17
3. Fuel and energy-related activities	t CO ₂ e	41,057.64	32,715.49	46,432.71	41.9	1,090.62	12,372.63
4. Upstream transportation and distribution	t CO ₂ e	617.88	175.5	145.8	(16.9)	11.1	5.7
5. Waste generated in operations	t CO ₂ e	1,302.07	3,150.29	3,697.42	17.4	85.20	75.79
6. Business traveling	t CO ₂ e	76.91	73.98	65.18	(11.9)	54.47	3.41
7. Employee commuting	t CO ₂ e	103.31	62.64	487.64	678.5	277.30	35.71
8. Upstream leased assets	t CO ₂ e	–	0.00	842.62		0.00	0.00
9. Downstream transportation	t CO ₂ e	–	N/A	N/A	N/A	N/A	N/A
10. Processing of sold products	t CO ₂ e	–	N/A	N/A	N/A	N/A	N/A
11. Use of sold products	t CO ₂ e	44.68	2.45	2.10	(14.0)	2.10	
12. End-of-life treatment of sold products	t CO ₂ e	–	N/A	N/A	N/A	N/A	N/A
13. Downstream leased assets	t CO ₂ e	1,568.92	1,124.50	1,239.43	10.2	135.61	314.95
14. Franchises	t CO ₂ e	–	0.00	0.00		0.00	0.00
15. Investments	t CO ₂ e	742.11	538.06	550.47	2.3	0.00	0.00
Share of emissions calculated from primary data	%	n/a	n/a	73.1	n/a	62.7	1.0
Total GHG emissions							
Total GHG emissions (location-based)	t CO₂ e	74,968.64	47,907.16	74,504.02	55.5	4,388.07	6,957.27
Total GHG emissions (market-based)	t CO₂ e	82,121.459	61,228.62	84,117.18	37.4	3,493.25	16,262.11

	Hungary	Czech Republic	Romania	Slovakia	Croatia
	2024	2024	2024	2024	2024
	4,375.71	3,164.00	659.70	925.21	132.35
	133.90	9,466.82	0.00	118.93	871.61
	133.90	9,452.36	0.00	139.71	1,123.20
	6,052.59	27,351.38	5,958.75	3,431.73	1,461.25
	1,943.03	941.14	599.84	6.72	0.54
	670.58	450.95	644.10		
	2,725.98	23,368.56	3,282.27	2,278.97	1,313.69
	49.0	33.0	47.0		
	487.43	926.24	1,385.54	595.56	141.66
	2.57				4.73
	174.00				0.63
	0.00	842.62	0.00	0.00	0.00
	N/A	N/A	N/A	N/A	N/A
	N/A	N/A	N/A	N/A	N/A
	N/A	N/A	N/A	N/A	N/A
	0.00	788.87	0.00	0.00	0.00
	0.00	0.00	0.00	0.00	0.00
	0.00	0.00	0.00	550.47	0.00
	95.3	95.8	99.4	92.3	0.2
	10,443.50	39,589.78	6,618.45	4,191.76	2,315.19
	10,562.20	39,967.74	6,618.45	4,496.65	2,716.80

GHG intensity	Unit	Base year 2019	Total			Austria	Germany
			2023	2024	%	2024	2024
Total GHG emissions (location-based) per net turnover	t CO ₂ eq/€ m	356.3	142.4	183.0	28.5	46.9	265.9
Total GHG emissions (market-based) per net turnover	t CO ₂ eq/€ m	390.3	182.0	206.6	13.5	37.4	621.5
Net turnover	€ m	210.4	336.5	407.2	21.0	93.5	26.2
Total GHG emissions (location-based) per total reference gross leasable area	t CO ₂ eq/m ²	0.076	0.035	0.051	45.4	0.018	0.032
Total GHG emissions (market-based) per total reference gross leasable area	t CO ₂ eq/m ²	0.084	0.045	0.057	28.5	0.014	0.076
Total reference gross leasable area	m ²	983,245.9	1,369,268.2	1,464,202.4	6.9	248,833.2	214,448.8

Methodology applied

Boundaries of reporting – landlord and tenant utility consumption

The CO₂ footprint calculation is based on the GHG Protocol Corporate Standard. Emissions are stated in CO₂-equivalent (CO₂e) terms. The CO₂e values for electricity and district heating are based on information by the energy suppliers and on publicly available sources, including the European data from the Association of Issuing Bodies (AIB) as well as the government conversion factors of the British Department for Energy Security. CO₂ emissions are verified at Group level.

Normalisation

Please see explanation for E1-5

(E1-6_14)

Revisions to our environmental disclosures in 2023 were made where relevant and based on updated information for correctness and consistency:

- Change in consumption or GLA of some assets due to updated information;
- GHG emission factors have been updated for 2023 according to the latest information.

To provide more accurate reporting, a new calculation was used during 2024 to better determine district heating emission factors. As a result of this updated methodology, significant changes were observed in the emission factors for district heating. To ensure consistency in year-on-year greenhouse gas emissions disclosures, the changes in district heating emission factors were retroactively applied to the year 2023. This led to a notable decrease in greenhouse gas values for 2023, due to the lower emission factor values identified.

(E1-6_15)

In 2024, the scope of the portfolio subject to collection, monitoring and reporting of environmental data was expanded as follows:

Developments are excluded from the reporting scope until the first full calendar month after a building goes into operation.

Major refurbishment is defined as any alteration that affects more than 50% of the total building floor area or requires the relocation of more than 50% of regular building occupants. Absolute consumption values are included for a major refurbishment, while for intensity calculations, GLA values are proportionately reduced to reflect the actual period of full operation in the year. Also, disclosures on fuels consumed by company cars, business trips, employee commuting and our proportional share of equity investments emissions are included for GHG in ESRS tables.

In 2023, the internal resales of buildings were incorporated into our reporting procedures to accurately allocate emissions to particularly companies. For 2024 reporting, we continue with this „internal resales“ procedure.

Definitions in the Group's reporting differ between segments as follows:

- Retail, Offices, and Residential segments are reported based on Gross Leasable Area („GLA“);
- Hotels are reported based on the area that represents space leased to hotel operators;

The Reference Gross Leasable Area is used for the final calculations of indicators and includes not only the GLA of the properties that were part of the portfolio for the entire year, but also the GLA of buildings acquired/sold during the year, normalized monthly.

	Hungary	Czech Republic	Romania	Slovakia	Croatia
	2024	2024	2024	2024	2024
	95.9	427.9	100.6	273.7	465.5
	97.0	432.0	100.6	293.6	546.2
	108.9	92.5	65.8	15.3	5.0
	0.031	0.130	0.031	0.036	0.088
	0.031	0.131	0.031	0.039	0.103
	341,894.4	304,615.3	213,013.3	114,975.2	26,422.3

S IMMO publishes environmental KPIs each calendar year, including all data available up to and including 28 February 2025. Certain information pertaining to 2024 was not available within this period. This information is taken from the Group's 2023 environmental report as a proxy. Data will be updated in subsequent reporting once available.

[\(E1-6_16\)](#)

S IMMO uses the operational approach for GHG emissions calculation.

[\(E1-6_18, E1-6_21, E1-6_23\)](#)

In 2024, one PV plant was completed with a capacity of 207 kWp at the location of Vienna Twin Tower so that in total 874.73kWp of PV Capacity are installed at our portfolio. Renewable electricity production is present within the Austrian portfolio, Hungary, Romania and Slovakia with an annual production of 961 MWh, representing avoiding the emission of 255.38t CO₂e in 2024.

[\(E1-6_25\)](#)

The information regarding the primary data is collected for consumption, as well as for other calculations. Based on this information the percentage of total GHG Emissions using primary data is 73%.

The share of estimations split by scopes is:

- Scope 1: 18%
- Scope 2: 23%
- Scope 3: 38%

[\(E1-6_26\)](#)

Following Scopes 3 GHG emissions categories have been excluded, because all these are not relevant for S IMMO's business (real estate).

- 3.09 Downstream transportation & distribution
- 3.10. Processing of sold products
- 3.12. End-of-life treatment of sold products

Category 3.14 Franchises is also not relevant. All emissions from our buildings that are owned by the reporting company (acting as lessor) and leased to other entities in the reporting year (that are not included in scope 1 or scope 2) are already included in category 3.13.

[\(E1-6_27\)](#)

For Scope 3 GHG emissions categories we use hybrid approach using both screening and inventory. We use a screening for following categories: 3.4, 3.11,

We use an inventory for following categories: 3.1, 3.2, 3.3, 3.5, 3.6, 3.7, 3.8, 3.13, 3.14, 3.15.

[\(E1-6_29\)](#)

Scope 1 is reported based on operational control. Under the operational control approach, S IMMO accounts for 100% of the GHG emissions from operations over which it or one of its subsidiaries has operational control. Scope 1 encompasses GHG emission from greenhouse gas sources (greenhouse gas source physical unit or process that releases a GHG into the atmosphere) owned or controlled by the organisation (Direct GHG emissions).

Scope 2 includes energy indirect greenhouse gas emissions. GHG emission from the generation of imported electricity, heat or steam consumed by the organisation (Energy indirect GHG emissions) are reported here.

Scope 3:

3.01 We include main purchased goods and services (in terms of volume, cost, impact on GHG, etc.). Method of GHG Calculation is spend-based method – estimates emissions for goods and services by collecting data on the economic value of goods and services purchased and multiplying it by relevant secondary (e.g., industry average) emission factors (e.g., average emissions per monetary value of goods). It is possible to combine it supplier-specific data from product-level GHG inventory from main suppliers.

3.02 Main purchased capital goods are included (such as remodels and refits of leased spaces, smaller refurbishments etc.). All upstream (cradle-to-gate) emissions of purchased capital goods are included. The method of GHG calculation is the same as for category 3.1 - spend-based method and supplier-specific method.

3.03 Includes consumption of fuels and energy purchased (heat and electricity) in S IMMO's properties. This category includes emissions related to the production of fuels and energy purchased and consumed by the reporting company in the reporting year that are not included in Scope 1 or Scope 2.

Method of GHG Calculation:

- Supplier-specific method, which involves collecting data from fuels and energy purchased providers on upstream emissions (extraction, production, and transportation), transmission and distribution losses and generation of electricity consumed by the reporting company.
- Average-data method, which involves estimating emissions by using secondary (e.g., industry average) emission factors for upstream emissions per unit of consumption (e.g., kg CO₂e/kWh).

3.04 Emissions from third-party upstream transportation and distribution connected to the fit-out works in the reporting company's owned or controlled operations in the reporting year.

3.05 Emissions from third-party disposal and treatment of waste generated in the reporting company's owned or controlled operations in the reporting year. This category includes emissions from disposal of both solid waste and wastewater. Waste treatment at facilities owned or controlled by the reporting company is accounted for in scope 1 and scope 2.

Method of GHG Calculation:

- Waste-type-specific method is used, which involves using emission factors for specific waste types and waste treatment methods. Waste reporting has improved at our assets during the past years.

3.06 This category includes emissions from the transportation of employees for business-related activities in vehicles owned or operated by third parties, such as aircraft, trains, buses, and private passenger cars. Emissions (refrigerants, oils, maintenance etc) from leased vehicles operated by the reporting company (S IMMO's car fleet) not included in Scope 1 are reported in 3.6 category. Business trips by private cars are reported in 3.6 category. Well-to-tank (WTT) emissions from fuel consumption are reported under Scope 3.3.

Method of GHG Calculation:

- Fuel-based method, which involves determining the amount of fuel consumed during business travel and applying the appropriate emission factor for that fuel.
- Distance-based method, which involves determining the distance and mode of business trips, then applying the appropriate emission factor for the mode used. Note: S IMMO utilizes fuel-based method for S IMMO's car fleet and distance-based method for employees' private cars utilized for business travel or where info about fuel is missing includes emissions from the transportation of employees between their homes and their worksites. Emissions from employee commuting may arise from: automobile travel, bus travel, rail travel, air travel, other modes of transportation (e.g. subway, bicycling, walking).

Method of GHG Calculation:

Distance-based method, which involves collecting data from employees on commuting patterns (e.g., distance travelled, and mode used for commuting) collected by questionnaire survey distributed to all employees. In the next step data collected from questionnaire are calculated into emissions by applying appropriate emission factors for the modes used.

3.08 Category 3.8 includes Scope 1 and Scope 2 emissions from the operation of assets that are leased by the reporting company in the reporting year and are not already included in the reporting company's scope 1 or scope 2 inventories.

Method of GHG Calculation:

Asset-specific method, which involves collecting asset-specific (e.g., site-specific) fuel and energy use data and process and fugitive emissions data or Scope 1 and Scope 2 emissions data from individual leased assets. These data are provided by an environmental reporting tool of CPI Property Group. It concerns leased cars and leased property.

3.11 It includes the sale of renewable electricity to the grid from the PV.

3.13 Includes emissions from the operation of assets that are owned by S IMMO (acting as lessor) and leased to other entities in the reporting year that are not already included in Scope 1 or Scope 2.

3.15 We report proportional Scope 1 and Scope 2 emissions from equity investments in the reporting year in this category (Investments). Proportional emissions from equity investments are allocated to the investor based on the investor's proportional share of equity in the investee.

(E1-6_32)

The calculations of property portfolio value were performed in accordance with IFRS in line with the consolidated financial statement. The property portfolio value is based on the consolidated data of the Group and includes the application of the fair value method.

E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

(E1-9_14, E1-6_16, E1-6_19, E1-6_21, E1-6_29)

In DMA the material transition risks were identified and to our assets are linked following transition risks:

- Risk of increased cost of fossil fuel resources
- Carbon pricing mechanisms
- Adaptation Assessment and Implementation Risk

In accordance with these risks all assets with a significant fuel consumption (defined as assets with GLA exceeding 5,000 m², gas consumption higher than 600 MWh in 2024 and fuel intensity more than 50kWh/m²) as well as assets with at least one red flag in the Climate risk analysis (CRA) were considered as at material transition risk. For further details of the CRA please see E1.SBM-3_01 – 07.

The total fair value of assets at material transition risk before considering climate mitigation actions is EUR 1,584m, equalling 45,58% of assets based on GLA. Mitigation measures are considered in all assets as the Climate Transition Action Plan of CPI Europe covers the entire portfolio.

(E1-9_17)

Carrying amount of assets by energy efficiency class as stated in the Energy performance certificates.

Primary Energy Efficiency Class	Fair Value M EUR
A	464,20
B	589,14
C	729,05
D	1.256,35
E	133,10
F	41,35
G	0,50
None	323,57

(E1-9_18)

The potential effects on future financial performance and position for assets and business activities at material transition risks have been assessed. Please see detailed description in E1.IRO-1.

As material transition risks we identified

- Risk of increased cost of fossil fuels resources
- Carbon pricing mechanisms
- Market Reputation and Investor Confidence
- Financial Penalties
- Adaptation Assessment and Implementation Risk

The assessment of risks was done based on a combination of the likelihood of occurrence and the potential magnitude/size of the financial effects. Our assessment took into account also the different perspective - short, medium and long-term.

(E1-9_20, E-9_21)

All assets considered to be at material transition risk were also considered as potentially stranded. This results in an estimated amount of potentially stranded assets of EUR 1,584m based on fair value.

(E1-9_22)

Invoices, automatic meter readings, manual-visual readings, or data provided by tenants were considered as primary data.

If any part of the reported data was based on estimation, the share of estimation had to be reported (up to 25%, up to 50%, or 100%).

This resulted in the following shares of estimation:

- electricity estimation: 15%
- fuel estimation: 21%
- heating and cooling estimation: 36%

(E1-9_23)

As described in ESRS 2, SBM-3, currently the direct impact on the Group's financial statements resulting from the material transition risks are minimal. Given that our Material impacts, Risks, and Opportunities (IROs) are closely tied to our core business and growth potential, our initiatives aimed at enhancing opportunities and mitigating associated risks are integrated within our established corporate governance approach. In the future the cost for emission certificates can be considered between EUR 21.4m and 36.3m.

(E1-9_41)

The expected cost savings from climate change mitigation actions consist mainly of cost savings of higher operating costs for emission certificates, or increased costs for use of restricted substances (as HFCs). Another amount of expected savings is from energy consumption savings.

The expected cost savings from climate change mitigation actions in total are between EUR 59.3m and 117.2m depending on the future development of the price for CO₂ certificates.

(E1-9_42)

The expected cost savings from climate change adaptation actions consist mainly of cost savings of settlement of damages after hazardous events (for example floods, tornado) or decreasing the costs of maintenance.

The expected cost savings from climate change adaptation measures cannot yet be quantified. A corresponding analysis is planned for the financial year 2025.

ESRS E3 Water and marine resources

ESRS 2 General disclosures

Impact, risk and opportunity management

Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

(E3.IRO-1_01)

See disclosures under ESRS 2 – IRO 1

Management approach

Material impacts, risks and opportunities	(7) Water withdrawal of S IMMO's building portfolio
Policies	Group Policy Environment and CSR Code of Business Ethics and Conduct Risk Management Policy
Targets	Reduction of water intensity of the property portfolio by 10% by 2030 compared to the 2019 base line
Key actions	Improvement of data quality Using water saving faucets

(E3.IRO-1_02)

Since the majority of our drinking water supply comes from municipal sources, we are dependent on the water supply and therefore have no material impact on affected communities.

E3-1 – Policies related to water and marine resources

(E3.MDR-P_01-06)

Policy Overview

The internal guidelines that indirectly relate to our organisation's approach to water savings principles are detailed in two key documents:

- the Group Policy on Environment and Corporate Social Responsibility (CSR)
This policy states the principles for the Group in terms of environmental performance management designed to optimise the use of natural resources, replacement and savings of potable water, among other objectives.
- the Code of Business Ethics and Conduct
This policy encapsulates the Group's proactive stance on environmental protection and its commitment to efficiency use of resources, where water is one of the critical.

A description of the policies can be found under ESRS 2, MDR-P.

(E3-1_01 to E3-1_06)

CPI Europe has set group ESG Strategy & Goals to reduce water intensity across its portfolio which are approved by the ESG Committee of CPI Europe's Supervisory Board and are closely tracked and managed at Group level. This initiative aims to minimize water usage and its environmental footprint also for S IMMO.

E3-2 – Actions and resources related to water and marine resources

(E3.MDR-A_01-07, E3.MDR-A_08, E3.MDR-A_09-12)

S IMMO has conducted climate risk analyses to identify locations with potential water scarcity issues – these were some assets in Bucharest, Romania. To ensure that drinking water is used in a resource-efficient manner in buildings, both technical and behavioural measures are implemented. S IMMO has been using flow restrictors, sensor-controlled taps and modern toilet cisterns with dual-flush systems help to minimise flushing water consumption within its building portfolio. These are also required in many of our buildings due to their LEED or BREEAM certification.

(E3-2_03)

Each asset has a main water meter, since the majority of the drinking water supply comes from municipal sources. Water treatment is disposed by the local waste-water network, which is treated in accordance with local laws and regulations.

At our office myhive "Am Wienerberg" for example, we use rain-water cisterns and storage tanks to significantly reduce the amount of water drawn from municipal sources. Future plans include the replacement of water-intensive grassy areas with planting that supports biodiversity.

With the digitalisation of consumption data which will be installed within the upcoming years, water consumption will be continuously monitored to detect leaks and ensure that water pipes are regularly checked for leaks and repaired rapidly in the future, ensuring that water and marine resources are used as efficiently as possible.

Also, we are raising awareness among tenants and educating them about the importance of using water sparingly through our green lease agreements.

Metrics and targets

E3-3 – Targets related to water and marine resources

(E3.MDR-T_01-13, E3-3_01 to 03)

A target has been set to reduce the water intensity of the property portfolio by 10% by 2030, compared with the 2019 baseline. Since the goal is a group-wide one, we are naturally aiming to implement more effective measures as quickly as possible in areas of high water stress, which were identified based on a comprehensive assessment of physical climate risks for all properties owned and managed by CPI Property Group. This assessment of physical climate risks uses the geodata from the Aqueduct Water Stress Projections provided by the WRI. This reduction target is part of the Group's broader ESG objectives to improve resource efficiency and mitigate environmental impacts.

E3-3_08

The target of reducing the water intensity is voluntary (not required by legislation).

E3-4 – Water consumption

(E3-4_01 to E3-4_12)

The Group does not have significant amount of water retained or discharged back to the water environment therefore the water withdrawal, water consumption and water discharges are disclosed in the same amounts. The Group reports municipal water consumption separately from water sourced onsite (extraction or capture) and water reuse. The water consumption amounted to 822,273 m³ 2024.

E3-4 Water consumption

	Unit	Baseline 2019	Total		Austria	
			2024	2023	2024	2023
Total water withdrawal	m ³	763,881.77	822,273.77	721,603.33	134,848.87	104,555.05
Water withdrawal in our own operation	m ³	625,783.83	563,191.66	534,637.27	129,279.99	100,716.48
Water withdrawal outside the organisation	m ³	138,097.94	259,082.11	186,966.06	5,568.88	3,838.58
Total water consumption	m ³	763,881.77	822,273.77	721,603.33	134,848.87	104,555.05
Water consumption in our own operation	m ³	625,783.83	563,191.66	534,637.27	129,279.99	100,716.48
Water consumption outside the organisation	m ³	138,097.94	259,082.11	186,966.06	5,568.88	3,838.58
Total water withdrawal in areas at material water risk	m ³	N/A	149,532.82	111,449.86		
Water withdrawal in areas at material water risk in our own operation	m ³	N/A	53,931.69	43,808.24		
Water withdrawal in areas at material water risk outside the organisation	m ³	N/A	95,601.13	67,641.62		
Total water consumption in areas at material water risk	m ³	N/A	149,532.82	111,449.86		
Water consumption in areas at material water risk in our own operation	m ³	N/A	53,931.69	43,808.24		
Water consumption in areas at material water risk outside the organisation	m ³	N/A	95,601.13	67,641.62		
Total water reused and recycled	m ³	0.00	4,879.60	0.00	0.00	0.00
Water reused and recycled in our own operation	m ³	0.00	4,879.60	0.00	0.00	0.00
Water reused and recycled outside the organisation	m ³	0.00	0.00	0.00	0.00	0.00
Total water stored	m ³	0.00	4,164.90	0.00	1,197.50	0.00
Water stored in our own operation	m ³	0.00	4,164.90	0.00	1,197.50	0.00
Water stored outside the organisation	m ³	0.00	0.00	0.00	0.00	0.00
Water store changes	m ³	0.00	4,164.90	0.00	1,197.50	0.00
Share of water consumption derived from direct measurement	%	N/A	47.8		33.3	

Water intensity	Unit	Baseline 2019	Total		Austria	
			2024	2023	2024	2023
Total water consumption in our own operation per net turnover	m ³ /€ m	3,630.10	2,019.44	2,144.69	1,442.51	1,394.79
Net turnover	€ m	210.43	407.18	336.46	93.482	74.961
Total water consumption in our own operation per total reference gross leasable area	m ³ /m ²	0.66	0.56	0.53	0.54	0.53
Total reference gross leasable area	m ²	947,547.53	1,464,202.45	1,369,268.20	248,833.21	198,509.47

Methodology applied

(E3-4_06)

Boundaries of reporting – landlord and tenant utility consumption

Please see explanation for E1-5

Water consumption

Please see explanation for E1-5

Normalisation

Please see explanation for E1-5

The objective was to use actual data for water consumption for the twelve-month period. To this end, automatically transmitted data (smart metering), read-out data and data from utility company invoices were used. Where no complete data was available, consumption was estimated using appropriate assumptions based on lettable space. Where no data was available for the full year reporting year, data from the previous year were used.

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	Germany		Hungary		Czech Republic		Romania		Slovakia		Croatia	
	2024	2023	2024	2023	2024	2023	2024	2023	2024	2023	2024	2023
	119,001.08	214,424.66	190,397.00	184,879.00	163,781.25	37,814.76	149,532.82	111,449.86	54,005.00	49,059.00	10,707.75	19,421.00
	112,852.64	205,821.70	148,678.00	144,089.00	103,180.39	20,424.05	53,931.69	43,808.24	11,766.00	11,164.00	3,502.95	8,613.80
	6,148.44	8,602.96	41,719.00	40,790.00	60,600.86	17,390.71	95,601.13	67,641.62	42,239.00	37,895.00	7,204.80	10,807.20
	119,001.08	214,424.66	190,397.00	184,879.00	163,781.25	37,814.76	149,532.82	111,449.86	54,005.00	49,059.00	10,707.75	19,421.00
	112,852.64	205,821.70	148,678.00	144,089.00	103,180.39	20,424.05	53,931.69	43,808.24	11,766.00	11,164.00	3,502.95	8,613.80
	6,148.44	8,602.96	41,719.00	40,790.00	60,600.86	17,390.71	95,601.13	67,641.62	42,239.00	37,895.00	7,204.80	10,807.20
							149,532.82	111,449.86				
							53,931.69	43,808.24				
							95,601.13	67,641.62				
							149,532.82	111,449.86				
							53,931.69	43,808.24				
							95,601.13	67,641.62				
	0.00	0.00	0.00	0.00	0.00	0.00	4,879.60	0.00	0.00	0.00	0.00	0.00
	0.00	0.00	0.00	0.00	0.00	0.00	4,879.60	0.00	0.00	0.00	0.00	0.00
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	0.00	0.00	1,136.00	0.00	36.00	0.00	1,671.40	0.00	124.00	0.00	0.00	0.00
	0.00	0.00	1,136.00	0.00	36.00	0.00	1,671.40	0.00	124.00	0.00	0.00	0.00
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	0.00	0.00	1,136.00	0.00	36.00	0.00	1,671.40	0.00	124.00	0.00	0.00	0.00
			74.2		53.1		69.5		29.5			

	Germany		Hungary		Czech Republic		Romania		Slovakia		Croatia	
	2024	2023	2024	2023	2024	2023	2024	2023	2024	2023	2024	2023
	4,547.93	4,384.33	1,747.84	1,747.88	1,770.17	2,241.54	2,272.88	1,755.50	3,526.51	3,165.71	2,152.74	1,771.18
	26,166	48,907	108,933	105,773	92,523	16.87	65.79	63,486	15,314	15,497	4,974	10,965
	0.55	0.56	0.56	0.54	0.54	0.56	0.70	0.52	0.47	0.43	0.41	0.39
	214,448.79	383,292.08	341,894.40	340,684.18	304,615.27	67,667.53	213,013.28	214,553.85	114,975.23	114,980.63	26,422.27	49,580.46

As direct measurement data based on automatically transmitting and utility company invoices were considered. For the reporting year 2024, we newly added water in fire sprinkler tanks to water storage. Therefore, no changes in water storage are reported for 2023.

ESRS E5 Resource use and circular economy

ESRS 2 General disclosures

Impact, risk and opportunity management

Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

See ESRS 2 IRO-1

(E5.MDR-P_01-06 -14, E5-3_06_24)

Management approach

Material impacts, risks and opportunities	(8) Generation of waste
Policies	Code of Business Ethics and Conduct Group Policy Environment and CSR Risk Management Policy
Targets	Elimination of waste sent to landfill wherever possible, waste recycling rate of 55% by year end 2025 and 60% by year end 2030
Key actions	Improvement of data quality with additional data collected Analysis of waste streams Waste prevention promotion Green lease agreements

(E5.IRO-1_01-11a, b, E5-5_12-38, a,b)

The daily operation of buildings produces a substantial volume of waste. Therefore, S IMMO undertakes a comprehensive assessment of waste generation within its portfolio. This process includes the collection of data pertaining to waste production, encompassing quantities, methods of disposal, and the types of analyses conducted on this data to discern patterns and identify opportunities for enhancement. In the course of identifying areas for improvement, waste assessments were performed across the portfolio to get actual data as a benchmark for the segment. An evaluation of the potential risks associated with various waste types was incorporated into a double materiality assessment, which took into account potential environmental, health, and safety risks. Inadequate waste management practices, particularly in landfills, can lead to air pollution and the contamination of water and soil. These risks can be mitigated through proactive waste management, elevated recycling rates, and, most critically, the prevention of waste generation. S IMMO has identified the predominant challenge as the reduction of mixed waste and have established our objectives in this domain accordingly.

E5-1 – Policies related to resource use and circular economy

(E5-1_03_AR 9 a and b, E5-3_13-27)

The internal guidelines that indirectly support our company's circular economy principles are detailed in two key documents:

- the Code of Business Ethics and Conduct
This policy encapsulates the Group's proactive stance on environmental protection and its commitment to high standards of performance, use of natural and other resources as critical components of a circular economy.
- the Group Policy on Environment and Corporate Social Responsibility (CSR)
This policy states the principles for the Group in terms of circular economy management designed to optimise the use of natural and other resources, minimise waste and promote reuse and recycling of raw materials, among other objectives.

Moreover, our waste management objectives are consistent with Directive (EU) 2018/851, that underscores the significance of sustainable waste management practices. Notably, Article 11(2) of Directive (EU) 2018/851 establishes member state recycling and reuse targets, which we are committed to achieving. Furthermore, the directive emphasises the importance of improving the efficiency of resource usage and recognising waste as a valuable resource, facilitating the shift towards a circular economic model. This transition involves adopting sustainable production and consumption practices and is anticipated to create substantial opportunities for local economies and stakeholders, including those in the real estate sector. Consequently, waste reduction practices are covered in our internal guidelines for suppliers and tenants.

5-2 – Actions and resources related to resource use and circular economy

(E5.MDR-T_01-12, E5.MDR-T_01-13, E5.MDR-T_01-23, E5-3_09-25)

The Group has introduced following circular economy actions (particularly related to waste reduction):

- Introduced a new category of hazardous recyclables in 2024 in order to properly address this type of waste.
- Over time, we have analysed waste streams using waste scanning, primarily in shopping centres in the Czech Republic, to identify critical waste streams and develop more efficient, tailored waste management strategies.
- Waste prevention promotion via constantly updated education and awareness programs.
- A gradual increase in the number of green leases, mainly with major tenants, including clauses that encourage waste reduction practices.

Waste management is also governed by legislation, which we diligently monitor within each local jurisdiction. All assets adhere

to local regulations and facilitate the segregation of waste into relevant categories for our buildings' operations. Furthermore, we actively encourage our tenants to adopt green lease agreements, reflecting our commitment to sustainability and environmental responsibility.

Metrics and targets

(E5-3_06, E5-3_07, E5-3_09, E5-3_13, E5-5_12 to E5-5_14)

As a part of its Environmental, Social and Governance (ESG) strategy, the Group has adopted an objective (aligned with EU targets) to eliminate waste sent to landfill whenever feasible, plus the intention to achieve a 55% recycling rate by year end 2025 (increasing to 60% by 2030). We also ensure that our commitments are transparently communicated and publicly accessible. Our established processes are firmly rooted in the functions that bear day-to-day responsibility for ensuring adherence to our policies.

In 2024 the waste recycling rate across the entire portfolio was 41.71%.

Waste streams are contingent upon the particular segment of our portfolio. The most significant waste streams among recyclable materials are paper and plastic. These materials are generated in larger quantities due to documentation, and other operational activities, however, a gradual decline in their production is taking place with the advent of electronic documentation that does not necessitate a printed counterpart. While in sectors such as hospitality, biological waste including food scraps and organic matter is predominant. The primary non-recyclable waste stream across the various segments is municipal mixed waste. This category encompasses a diverse array of materials that are not readily separable for recycling purposes, including contaminated packaging, specific types of plastics, and various composite materials. Municipal mixed waste is significantly predominant across all sectors, rendering it a critical emphasis in our waste management strategies. Initiatives are primarily concentrated on reducing and managing this category of waste in order to mitigate its environmental impact.

(E5-5_17)

E5-5 Resource outflows - Waste

	Unit	Total		Austria	
		2024	2023	2024	2023
Total waste generated	t	11,767.53	11,127.80	1,689.50	1,520.52
Total hazardous waste generated	t	458.01	171.69	253.00	89.39
Total hazardous waste recovery	t	38.32			
Preparation for reuse	t	N/A	N/A	N/A	N/A
Recycling	t	38.32			
Other recovery operations	t	N/A	N/A	N/A	N/A
Total hazardous waste disposal	t	419.69	171.69	253.00	89.39
Total incineration	t	N/A	N/A	N/A	N/A
incineration with energy recovery	t	N/A	N/A	N/A	N/A
incineration without energy recovery	t	N/A	N/A	N/A	N/A
Landfilling	t	N/A	N/A	N/A	N/A
Other disposal operations	t	N/A	N/A	N/A	N/A
Total radioactive waste generated	t				
Total non-hazardous waste generated	t	11,309.52	10,956.12	1,436.50	1,431.13
Total non-hazardous waste recovery	t	4,908.46	5,173.04	1,097.03	1,274.25
Preparation for reuse	t	206.22	18.46		
Recycling	t	4,702.24	5,154.58	1,097.03	1,274.25
Other recovery operations	t				
Total non-hazardous waste disposal	t	6,401.06	5,783.07	339.47	156.88
Total incineration	t	1,632.69	1,165.13	291.06	95.34
incineration with energy recovery	t	1,424.87	1,143.02	291.06	95.34
incineration without energy recovery	t	207.82	22.11		
Landfilling	t	4,738.50	4,588.04	48.41	60.74
Other disposal operations	t	29.88	29.90		0.79
Total non-recycled waste	t	6,859.07	5,954.76	592.47	246.27
Share of non-recycled waste of total waste generated	%	58.3	53.5	35.1	16.2

Methodology applied**Boundaries of reporting – landlord and tenant utility consumption**

Data for waste is derived from invoices of the waste disposal companies. In case tenants having their own waste management, the share of waste generated by tenants is completed with site-specific benchmarks.

Waste generation

Waste data is disclosed based on the invoices of the respective waste disposal companies. Where data was not available for individual assets, it was complemented with comparable figures, calculated using country- and asset-specific actual data, or estimated. Where no data was available for the full year 2024, data from 2023 was used. The waste generated by buildings

acquired or sold during the year was considered for the full months in which these buildings were part of the portfolio.

Normalisation

Please see explanation for E1-5

(E5-5_17)

Data is collected based on based waste disposal processes, reported in tons. In case no real data is available, appropriate estimations were made as described in ESRS 2.

For the reporting year 2024 we included hazardous waste recovery and disposal to our waste reporting for the first time.

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	Germany		Hungary		Czech Republic		Romania		Slovakia		Croatia	
	2024	2023	2024	2023	2024	2023	2024	2023	2024	2023	2024	2023
	1,413.02	2,539.95	1,809.35	2,317.07	2,642.07	266.50	2,808.30	2,813.42	1,119.66	1,137.60	285.63	532.76
			90.06	74.65	114.06	7.00			0.89	0.65		
			38.32									
	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
			38.32									
	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
			51.74	74.65	114.06	7.00			0.89	0.65		
	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	1,413.02	2,539.95	1,719.29	2,242.42	2,528.00	259.50	2,808.30	2,813.42	1,118.78	1,136.95	285.63	532.76
	1,372.34	2,467.07	453.50	200.22	875.80	94.02	900.29	850.22	120.55	122.88	88.94	164.37
			6.76	17.07	199.46	1.39						
	1,372.34	2,467.07	446.74	183.15	676.34	92.63	900.29	850.22	120.55	122.88	88.94	164.37
	40.68	72.87	1,265.79	2,042.20	1,652.20	165.48	1,908.01	1,963.20	998.23	1,014.06	196.69	368.38
			715.15	876.93	469.49	36.86			157.00	156.00		
			715.15	876.93	261.67	14.74			157.00	156.00		
					207.82	22.11						
	40.68	72.87	539.09	1,161.40	1,182.38	128.39	1,908.01	1,963.20	823.25	833.04	196.69	368.38
			11.56	3.87	0.34	0.23			17.98	25.02		
	40.68	72.87	1,355.84	2,116.85	1,766.27	172.48	1,908.01	1,963.20	999.11	1,014.71	196.69	368.38
	2.9	2.9	74.9	91.4	66.9	64.7	67.9	69.8	89.2	89.2	68.9	69.1

Social information

ESRS S1 Own workforce

ESRS 2 General disclosures

Strategy

Disclosure Requirement related to ESRS 2 SBM-2 – Interests and views of stakeholders

See information under ESRS 2 SBM-3

Disclosure Requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

(S1.SBM-3_01 to S1.SBM-3_12)

Motivated and well-educated employees are the key to success for our strategy and business model. It's our employees who are executing the strategy, seeking innovation and developing new ideas. Their skills, motivation, and engagement directly impact productivity, quality, and overall business performance. S IMMO strives to create a framework for its employees in which they can develop their potential, strengths, and competencies to the best of their abilities.

Material IRO's related to own workforce are disclosed under ESRS 2 SBM-3 of this statement.

The report by S IMMO includes all employees on whom direct influence can be exerted by the Group and also hotel employees over whom the Group has no direct influence (even though the Group has employment contract with these employees). This refers to 566 employees in Austria and Hungary. They were taken into account during the Double Materiality Assessment and the management of material IRO's considering that there is only very limited information available and that the management of the hotels is not subject to directives by the management of S IMMO. The employees of the two hotels differ from the other employees in that S IMMO has no responsibility for personnel management (selection, policies, target agreements, etc.). Hotel employees are included in all numerical data points but are not covered by processes, policies and work instructions. The own workforce of S IMMO consists of employees engaged either by S IMMO AG or one of its subsidiaries and non-employees. The majority of non-employees relate to the Budapest Marriott Hotel and refer to employees sourced from third party undertakings to cover seasonal peaks.

The identified material negative impacts are widespread and systemic. They are not connected to any specific business segments, countries or assets.

Professional and personal training abilities and supporting diverse teams have already resulted in a material positive impact. These impacts relate to own operations, regardless of the country or segments.

The whole workforce of S IMMO is engaged in the real estate and hotel operations in Austria, Germany, Hungary and Croatia as employees or non-employees. Considering the local circumstances, no individuals were identified with a greater risk of harm with concerning negative impacts on their human rights.

Impact, risk and opportunity management

Management approach

Impacts, risks and opportunities	(9) Decreased productivity (potential negative impact)
	(10) Mental health issues (potential negative impact)
	(11) Increased Risk of Accidents and Injuries (potential negative impact)
	(12) Gender inequality (actual negative impact)
	(13) Enhanced Employee Performance and Productivity (actual positive impact)
	(14) Promote creativity and innovation (actual positive impact)
Policies	Code of Business Ethics and Conduct
	Group Human Capital and Employment Relationships Policy
	Guideline on Education and Further Training
	Policy Statement on Respecting Human Rights
	Risk Management Policy
Targets	Minimum of 33% share of female senior managers
	At least eight hours of training per employee per year
	Biennial employee satisfaction surveys
Key actions	Appraisal interview
	Individual coaching
	Employee satisfaction survey
	Analysis of gender pay ratio
	Flexible working time arrangements and part-time working models
	Healthcare management with a focus on preventative healthcare and promotion of sporting activities

S1-1 – Policies related to own workforce

(S1.MDR-P 01-06)

Policies dealing with material impacts regarding our own workforce are listed above. For further details please refer to the policy overview under ESRS 2 MDR-P.

All policies and guidelines cover the Group's own workforce excluding hotel employees and are approved by the Group's Man-

agement Board, which is responsible for regularly reviewing their validity.

The employees of S IMMO AG in Vienna are organised within the framework of a Works Council. This Works Council represents the interests of the employees vis-à-vis the employer.

Internal policies and guidelines are made available to employees via the intranet.

(S1-1_01 to S1-1_08)

The Group Human Capital and Employment Relationships Policy which was newly introduced at CPI Europe in 2024 and adopted at S IMMO at the beginning of 2025. It covers all material impacts, risks and opportunities related to S IMMO's own workforce. This policy thus, in connection and compliance with the Code of Business Ethics and Conduct, provides guiding principles relating to the treatment of the Group's own workforce and candidates and other topics relevant for human capital. It defines the standards for working environment and relationships including the commitment to human rights and freedom of association. The policy covers following material impacts:

- diversity and equal treatment for all
- enhance employee creativity and productivity
- gender inequality
- mental health issues
- increased risk of accidents and injuries

The Guideline on Education and Further Training specifies S IMMO's approach to well-trained and experienced employees. The measures described therein shall enhance employee performance and productivity and mitigate the potential decrease in productivity.

The commitment to The Universal Declaration of Human Rights by the United Nations (UN), the UN Guidelines for Human Rights and Business, the UN Convention on the Rights of the Child, the UN Convention on the Elimination of All Forms of Discrimination against Women, the Fundamental Conventions of the International Labour Organisation (ILO), the Guidelines for Multinational Enterprises by the Organisation for Economic Co-operation and Development (OECD) and the ten principles of the UN Global Compact (UNGC) are laid down in the Code of Business Ethics and Conduct. The Code of Business Ethics and Conduct is unified within the CPI Group. All subsequent policies and guidelines are in line with the above-mentioned standards.

Compliance with human rights including labour rights is secured via the human rights due diligence process which is carried out regularly.

Engagement with own workforce is usually carried out via Works Council which is described under S1-2.

S IMMO is subject to numerous laws, regulations and standards. All business transactions and processes must therefore be carried out in such a way as to always comply with the relevant laws, regulations, industry standards and best practices in the countries where we conduct our business activities, both formally and in terms of content, and thereby also observing the local social norms. The Human rights due diligence process carried out for S IMMO by CPI Europe in 2024 identified no material risk of trafficking in human beings, forced labour or compulsory labour and child labour within the own workforce. Therefore, and in connection with the high governance standards applied in the Group, it was not considered necessary to explicitly mention these matters in the respective policies.

We are committed to creating an inclusive working environment in the Group, characterised by openness and mutual respect where every employee feels valued and heard.

The elimination of discrimination, the promotion of equal opportunities and other ways to advance diversity and inclusion form an integral part of the Group Human Capital and Employment Relationships Policy. This policy addresses all grounds for discrimination based on racial and ethnic origin, colour, sex, sexual orientation, gender identity, disability, age, religion, political opinion, national extraction or social origin, or other forms of discrimination covered by Union regulation and national law. The entire workforce must be recruited, trained, supported and treated fairly and equally and only based on characteristics that relate to the work that they perform, such as their talent, skills, experience and potential. All companies of the Group are required to subject their human resources and employment related policies to continuous assessment to examine how they affect protected groups and to identify whether their policies help to achieve equality of opportunity for all these groups or whether they have an adverse impact.

(S1-1_09)

Accident prevention is covered by the Human Capital and Employment Relationships Policy and also by workplace accident and prevention management system which is implemented in accordance with Austrian Legislation. It is regularly monitored and evaluated. Health and safety inspections are conducted at S IMMO's own office locations at least once a year by the safety officer, the company physician, the Works Council and the Human Resources department. Occupational safety risks are evaluated and compliance with statutory workplace and safety regulations is checked. S IMMO has one specially trained employee who serves as safety officer and can address any issues as they arise.

S1-2 – Processes for engaging with own workers and workers' representatives about impacts

(S1-2_01 to S1-2_08)

In Vienna, the employees of S IMMO formed a Works Council in 2021. This represents the interests of the employees to the management. The members of the Works Council are elected in internal democratic elections for a maximum of five years. The management and the Works Council are in constant dialogue regarding personnel issues in the company.

Communication with the management is carried out by the Works Council elected by the workforce. The Works Council's representatives are responsible for communicating directly with the company. Nevertheless, the company is free to collect feedback from the workforce in addition to this.

There is regular exchange between the Works Council and the Human Resources department. Ad-hoc meetings with the Management Board are held when necessary, covering all material impacts.

The Management Board of S IMMO AG is the highest authority for ensuring dialogue with the workforce. The final decision in personnel matters also lies with the company's Management Board.

The cooperation between management and the Works Council is regulated by the Austrian Labour Constitution Act. This law is based on the European Convention on Human Rights, which has constitutional status in Austria. Management gains an insight into the workforce's perspective on the Group's actions from the institutionalised employee survey and from exchanges with staff representatives. Their role is to convey on the views of the workforce to management and for this reason they also have special protection against dismissal.

The Works Council collects feedback from the workforce on Group's activities and communicates this to management. Furthermore, it is the responsibility of the Works Council to make agreements for the workforce. These agreements have the force of law. In the past, management and the Works Council have already reached several agreements that also improve the position of employees compared to the applicable labour law.

The management has set out the framework for the equal treatment of all employees in the Group Human Capital and Employment Relationships Guideline. The Works Council monitors the actions set by the management and points out problems with their implementation. Any problems that arise are resolved as quickly as possible.

S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns

(S1-3_01, S1-3_02, S1-3_05 to S1-3_10)

CPI Group's goal is to avoid the need for remedy by setting up appropriate measures to avoid material negative impacts on the own workforce. Therefore, a human rights due diligence as well as a double materiality assessment are performed by CPI Europe on a regular basis and appropriate measures are set up. These assessments include S IMMO.

Issues or concerns can be raised either directly to the Compliance Officer or the Internal Audit manager or via a third-party whistleblower system (EQS Integrity Line). The Compliance Officer serves as an independent and confidential point of contact and is available to employees at any time to answer questions. Both ways ensure anonymity to the reporter. Physical whistleblowing reports must be manually recorded by the Compliance Officer through the whistleblowing system before further steps are taken in order to document the correct processing of the whistleblowing report. The legal provisions for the protection of personal data must be strictly observed in doing so. The processing of whistleblowing reports must be documented in the whistleblowing system. The report is processed promptly in each instance by the Compliance Officer – in the event of Human Resources' responsibility, the Compliance Officer together with the Human Resources representative. When a report is received the Compliance Officer must promptly inform the Management Board of the receipt of the whistleblowing report and the subject. Once the investigation is completed, the Compliance Officer has to present a report to the Management Board including suggestions for remediation measures. They are drawn up taking the individual circumstances into account and have to be approved by the Management Board. Review is carried out upon demand.

The annual mandatory compliance training also addresses the existence of grievance mechanisms to the own workforce. The whistleblower system is mentioned in the Code of Business Ethics and Conduct and other relevant policies. It is available for everybody on the company's website. Own workforces trust in processes and structures will be part of the next employee survey which is planned for 2025.

Further details of the whistleblowing process and policy are described under chapter G1-1 in this statement.

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

(S1.MDR-A 01_12)

The following key actions were carried out during 2024:

- Appraisal interview
- Individual coaching
- Analysis of gender pay ratio
- Flexible working time arrangements and part-time working models

Healthcare management with a focus on preventive healthcare and promotion of sporting activities

They applied to the own workforce of S IMMO (excluding hotel employees) and were carried out on regular basis during the whole reporting period and will continue for the next financial year.

(S1-4_01 to S1-4_09)

Our priorities include strengthening our appeal as an employer, supporting the growth and satisfaction of our workforce, promoting social responsibility, and championing diversity and equal opportunities. Derived from this, various actions have been carried out in the 2024 financial year to achieve policy objectives and targets.

In connection with employee development, the focus of training is on expanding professional as well as personal and leadership skills. An important instrument in the context of performance management is the annual performance review between employees and their managers. These define clear targets and individual training activities. Performance reviews were conducted with 96.9% of employees of S IMMO in 2024. These interviews also include feedback from employees on several questions relating to personal well-being, further development and teamwork as well as suggestions for improvement. Individual training and coaching are provided coordination with their managers as well as participations in conferences.

The gender pay ratio was reported for the first time for the 2023 financial year. It is analysed regularly, and further equalization is being worked on.

S IMMO's employees are offered flexible and partially flexible working hours, as well as part-time working models. Since April 2023, employees with all-in contracts at the Vienna location have been able to reduce overtime worked as part of a flexitime account. This means that more work-intensive phases can be compensated with time off and employees gain flexibility - an important step towards a healthy work-life balance.

To support our employees' healthcare needs, we offer a preventive healthcare scheme. In addition to measures offers to fulfil all legal requirements, responsibilities there are also offers like carrying out vaccinations, medical check-ups, eye tests and providing advice on preventive healthcare.

Effectiveness is tracked via defined metrics and targets as well as individually for each employee in the own workforce during the course of the annual appraisal interview and the biannual employee satisfaction survey. If there are any actions required to avoid negative impacts on our own workforce, they are identified during the annual appraisal interviews..

No material risks or opportunities were identified in the double materiality assessment.

Metrics and targets

S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

(S1.MDR-T 01_13)

The following targets were set in relation to own workforce:

Minimum of 33% share of female senior managers

This target contributes to ensure gender equality. It is measured in percentage as the ratio of female senior managers to the total senior managers in head count at the end of each reporting period. It covers the own workforce (excluding non-employees) and is applicable for each reporting year. In the reporting period, the share of female senior managers within S IMMO was 44.6%. Thus, this target was met for the reporting period.

Completion of at least eight hours of training per employee per year

This target supports the enhanced employee performance and productivity and promoting creativity and innovation as well as it mitigates potential decreased productivity. It is measured in total hours of trainings completed by the employees as of the end of the reporting period divided by the head count at the end of the reporting period. In the reporting year 2024, S IMMO's employees completed 15.7 hours of training per person on average. Thus, this target was met for the reporting period.

Both targets apply to the reporting period and are recurring.

(S1-5_01 to S1-5_03)

The targets were set in a group-wide ESG-working group during the course of harmonizing the ESG-Strategies of CPI Property Group, CPI Europe and S IMMO AG in 2023.

S1-6 – Characteristics of the undertaking's employees

(S1-6_01 to S1-6_06)

Total number of employees by gender¹

	2024
Total number of employees	643
thereof female	320
thereof male	323
thereof other	0
thereof not reported	0

¹ Headcounts as of 31 December excluding Management Board and dormant employees**Total number of employees by country¹**

	2024
Total number of employees	643
thereof Austria	301
thereof Germany	47
thereof Hungary	294
thereof Croatia	1

¹ Headcounts as of 31 December excluding Management Board and dormant employees**Total numbers of employees by contract type by gender^{1, 2}**

	2024		
	Total	Female	Male
Total number of employees	643	320	323
breakdown by contract type			
thereof permanent	616	312	304
thereof temporary	27	8	19
breakdown by employment type			
thereof non-guaranteed hours	0	0	0
thereof full-time	574	271	303
thereof part-time	69	49	20

¹ Headcounts as of 31 December excluding Management Board and dormant employees² No employees made use of the option to indicate their gender as "other" or "not reported", which is why only the categories "female" and "male" are shown in the presentation of employee data.**Total numbers of employees by contract type by country¹**

	2024				
	Total	Austria	Germany	Hungary	Croatia
Total number of employees	643	301	47	294	1
breakdown by contract type					
thereof permanent	616	299	41	275	1
thereof temporary	27	2	6	19	0
breakdown by employment type					
thereof non-guaranteed hours	0	0	0	0	0
thereof full-time	574	257	40	276	1
thereof part-time	69	44	7	18	0

¹ Headcounts as of 31 December excluding Management Board and dormant employees

(S1-6_11, S1-6_12)

New employees & employee turnover¹

	2024			
	New employees	Rate for new hires in %	Departures	Rate of fluctuation in % ²
Total number	262	40.7	285	36.6
breakdown by gender				
thereof female	136	42.5	155	39.2
thereof male	126	39.0	130	34.0
breakdown by age group				
thereof under 30 years old	170	76.9	160	72.4
thereof 30-50 years old	81	29.8	94	34.6
thereof over 50 years old	11	7.3	31	20.7
breakdown by country				
thereof Austria	141	46.8	157	35.5
thereof Germany	11	23.4	34	60.1
thereof Hungary	110	37.4	93	33.5
thereof Croatia	0	0.0	1	-

¹ Headcounts as of 31 December excluding Management Board and dormant employees

² The rate of fluctuation is calculated using the Confederation of German Employers' Associations (Bundesvereinigung der Deutschen Arbeitgeberverbände) formula and does not distinguish between voluntary and involuntary departures (departures/average headcount in the period).

(S1-6_16)

The high turnover rate is caused by exits that were not replaced due to the new structure and synergies within the CPI Group and seasonal fluctuations in the hotel business.

(S1-6_17)

The number of total employees according to the Austrian Commercial Code (UGB) is 643.

S1-7 – Characteristics of non-employee workers in the undertaking's own workforce

(S1-7_01 to S1-7_03)

Characteristics of non-employees in own workforce¹

	2024
Total number of non-employees	92
thereof self-employed people	4
thereof people provided by undertakings primarily engaged in "employment activities"	88

¹ Headcounts as of 31 December excluding Management Board and dormant employees

(S1-7_06 to S1-7_10)

Methodology applied

All figures are reported as head count as of 31 December 2024.

The majority of non-employees relate to the Budapest Marriott Hotel sourced from external providers to cover seasonal peaks.

S1-9 – Diversity metrics

(S1-9_01 to S1-9_05)

Employee diversity

	2024	
	Number of employees	Total number in %
Top Management	18	2.8
breakdown by gender		
thereof female	7	38.9
thereof male	11	61.1
breakdown by age group		
thereof under 30 years old	0	0.0
thereof 30-50 years old	10	55.6
thereof over 50 years old	8	44.4
Total employees	643	
breakdown by gender		
thereof female	320	49.8
thereof male	323	50.2
breakdown by age group		
thereof under 30 years old	221	34.4
thereof 30-50 years old	272	42.3
thereof over 50 years old	150	23.3
Percentage of top management in total number of employees		2.8

(S1-9_06)

The category "Top Management" includes senior managers who are in charge of country management for S IMMO or in comparable positions at the hotels.

S1-13 – Training and skills development metrics

(S1-13_01 to S1-13_07)

Training hours¹

	2024	
	Total hours	Hours per employee
Number of training hours	12,248.0	19.0
breakdown by gender		
thereof female	6,053.0	18.9
thereof male	6,195.0	19.2
breakdown by employee category		
thereof Top Management	687.0	38.2
thereof Middle Management	1,599.0	44.4
thereof Entry-level Management	2,322.0	40.0
thereof Non-Management level	7,638.0	14.4

¹ Training hours refer to the number of hours completed by active employees as of 31 December**S1-14 – Health and safety metrics**

(S1-14_01 to S1-14_07)

Health & Safety metrics¹

	2024
Percentage of total employees who are covered by the undertaking's health and safety management system based on legal requirements and/or recognised standards or guidelines in %	100
Number of work-related accidents	61
Number of cases of work-related illness	61
Number of work-related injuries	61
Number of high-consequence work-related injuries (excl. fatalities)	0
Number of fatalities as a result of work-related injuries and work-related 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	691
Number of cases of recordable work-related ill health, subject to legal restrictions on the collection of data	20
Computing rate of work-related injuries ²	61.63

¹ Numbers cover the whole workforce² In computing the rate of work-related injuries, the undertaking shall divide the respective number of cases by the number of total hours worked by people in its own workforce and multiplied by 1,000,000. Thereby, these rates represent the number of respective cases per one million hours worked. A rate based on 1,000,000 hours worked indicates the number of work-related injuries per 500 full time people in the workforce over a 1-year timeframe. For comparability purposes a rate based on 1,000,000 hours worked shall be used also for undertakings with less than 500 people in the workforce.

S1-16 – Compensation metrics

(S1-16_01 to S1-16_04)

Gender pay gap and remuneration ratio

	2024
Total gender pay gap	14.72
breakdown by employee category	
thereof Top-Management	20.71
thereof Middle Management	3.08
thereof Entry-level Management	22.47
thereof Non-Management level	10.61
Annual total remuneration ratio¹	81.16

¹ Annual remuneration for the undertaking's highest paid individual divided by the Median employee annual total remuneration (excluding the highest-paid individual)

Methodology applied

The Gender Payment Gap shows the difference on an hourly level between the earnings of women and men. For the 2024 data the hourly pay was calculated for every employee within the Group. All employees of S IMMO and S IMMO-owned Hotels were included with their fix and variable salaries as well as additional bonuses and benefits-in-kind. All employees were grouped into four categories: Top-management, middle-management, entry-management and non-management. For those categories as well as for all employees (excluding Board-members) the following formula was applied: average male salary – average female salary / average male salary. The data from the S IMMO owned hotels was already received on a calculated level, thus the consolidated numbers were calculated by using a weighted average.

S1-17 – Incidents, complaints and severe human rights impacts

(S1-17_01 to S1-17_12)

Incidents, complaints and severe human rights impacts

	2024
Total number of incidents	0
thereof discrimination	0
on the grounds of gender	0
on the grounds of racial or ethnic origin, nationality	0
on the grounds religion or belief, disability, age, others	0
on the grounds of sexual orientation	0
thereof sexual harassment	0
Total number of filed complaints	0
thereof via internal grievance mechanisms	0
thereof via the National Contact Points for OECD Multinational Enterprises	n/a
Financial impact of the incidents and complaints	n/a
Fines or penalties in €	n/a
Compensation payments in €	0
Total number of severe human rights incidents	0
thereof non-respecting UN Guiding Principles on Business and Human Rights	0
thereof non-respecting ILO Declaration on Fundamental Principles and Rights at Work	0
thereof non-respecting OECD Guidelines for Multinational Enterprises	0
Financial impact of severe human rights incidents	n/a
Fines or penalties in €	n/a
Fines or penalties in €	n/a

In 2024, there were no known cases of discrimination including harassment due to ethnic origin or nationality, language, social origin, age, gender, gender identity, sexual orientation, religion, political or other beliefs, mental or physical ability or others. No cases of human rights violations were reported, nor were there any resulting court convictions or penalties.

Governance information

ESRS G1 Business conduct

ESRS 2 General disclosures

Governance

Disclosure Requirement related to ESRS 2 GOV-1 – The role of the administrative, supervisory and management bodies

(G1.GOV-1_01; G1.GOV-1_2)

The dual management structure of S IMMO consists of a Management Board and a Supervisory Board. These corporate bodies are strictly separated, in both their composition and functions, and can therefore independently carry out their assigned duties. The Management Board is responsible for the management of the company, the Supervisory Board for monitoring.

For more detailed information concerning the composition of the governing bodies and their access to expertise and skills with regard to sustainability matters, please see section ESRS 2, GOV-1 in this report.

Impact, risk and opportunity management

Management approach

Impacts, risks and opportunities	(15) Lack of corporate culture forms the basis for unethical behaviour and can lead to corruption and bribery
	(16) Retaliation against whistleblowers
	(17) Inadequate processes and training
Policies	Anti-Corruption, Anti-Bribery and Countering of Frauds Policy
	Anti-Money Laundering and Counter-Terrorist Financing Policy
	Code of Business Ethics and Conduct
	Compliance Guideline
	Risk Management Policy
	Whistleblowing System Directive
Targets	Mandatory annual employee training on Code of Conduct and associated policies
Key actions	Appraisal interview
	Regular trainings

Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess IROs

Business conduct IROs

The identification of IROs as part of the ESRS governance standard is based on the assessment of the ESG project team in collaboration with the Compliance Officer and the Internal Audit, as well as the analysis of group-wide policies and internal guidelines.

The assessment of business conduct covers the entire CPI Europe, which is facilitated by an extensive and regular communication of business conduct procedures, meaning that policies are generally in place across CPI Europe and the strategy for corporate culture is aligned throughout CPI Europe.

The assessment is based on discussions and surveys with the relevant stakeholders. In addition, the Austrian Code of Corporate Governance, the EU Whistleblower Directive, the UK Bribery Act 2019, the Foreign Corrupt Practices Act, as well as current and future EU anti-corruption laws and the OECD Guidelines for Multinational Enterprises were considered and assessed against current practices.

The following impacts and risk were identified in connection with business conduct:

Topic	Sub-Topic	Impact/risk explanation	
G1 Business conduct	Corporate culture (G1)	Potential negative impact	Lack of corporate culture forms the basis for unethical behaviour and can lead to corruption and bribery.
G1 Business conduct	Protection of whistleblowers (G1)	Potential negative impact	Retaliation against whistleblowers can have an impact on people and governance through a lack of confidence in the whistleblowing system, leading to an inability to detect wrongdoing, breaches of the right to privacy, labour rights, and legislation.
G1 Business conduct	Corruption and bribery (G1) – Prevention and detection including training	Risk	Failure to comply with anti-bribery and anti-corruption laws and ethical standards can result in disciplinary action and imprisonment for employees and management, as well as decreasing employee satisfaction and management legitimacy, which has a negative impact on corporate culture.

Please see also SBM3 of ESRS 2 for more detailed information on the double materiality analysis and for the risk identification process.

G1-1 – Corporate culture and Business conduct policies and corporate culture

(G.1MDR-P 01-06)

Policies are in place for each identified material sustainability issue to prevent, mitigate and remediate actual and potential impacts, address risks and pursue opportunities. The most senior person responsible for implementation monitors effectiveness on an ongoing basis and reports actions alongside the relevant disclosures. Policies relating to specific sustainability matters are disclosed under each topic on the following pages:

Please see the disclosures under ESRS 2, MDR-P

Business conduct and corporate culture

(G1-1_01)

S IMMO is committed to business conduct based on integrity, honesty, fairness, transparency and responsibility. Mutual trust is the basis for constructive cooperation within the company and with business partners. All activities in the areas of compliance and the fight against corruption, sustainable procurement and human rights are carried out in accordance with these principles.

The Code of Business Ethics and Conduct serves as the basis for all business activities and internal decisions and includes clear guidelines on respect for basic rights, integrity and fairness, a ban on discrimination and rules for relations with competitors, customers and professional associations.

The principles of responsible management also include the clear commitment to and the support for internationally recognised human rights. In particular, S IMMO is committed to social and societal responsibility through the participation in the United Nations Global Compact.

The Whistleblowing System Directive sets out the communication channels and compulsory regulations for the receipt, submission, assessment and processing reports of violations of S IMMO's business principles and the Code of Business Ethics and Conduct or legal infringements concerning the company.

S IMMO's Organisational Policy Issuer Compliance covers the legal prohibition on the use of insider information for insider trading and the unlawful disclosure of insider information.

S IMMO's high standards were also formally established along the value chain in the financial year 2023 by introducing a group-wide standardised Supplier Code of Conduct.

The Management Board of S IMMO has overall responsibility for issuing, implementing and monitoring compliance with the individual guidelines. Advice on the implementation of the organisation's policies and practices for responsible business conduct can be obtained from the persons responsible in the respective departments. The Legal department and Compliance Officer are responsible for monitoring new legislation and requirements in the areas of corporate and operative law.

All guidelines are available to all employees on the intranet. All S IMMO employees receive annual training on the above topics.

Reporting Violations and Whistleblowing

(G1-1_02, G1-1_05, G1-1_08)

In accordance with the national Whistleblower Protection Act (HinweisgeberInnenschutzgesetz) and EU-Whistleblower Directive EU 2019/193, the purpose of the Whistleblowing System Directive is to establish a working environment in which employees feel at comfort reporting potential violations of the S IMMO's business principles and the Code of Business Ethics and Conduct or violations of legal regulations which have been perceived by them personally to the best of their knowledge and belief without fear of personal consequences or other disadvantages.

Employees and other stakeholders are able to report issues such as harassment and discrimination, corruption, human rights violations and conflicts of interest via an electronic whistleblowing system, the 'EQS Integrity Line' whistleblowing tool. Reports can be submitted either anonymously or non-anonymously. The whistleblowing system is available to all on the S IMMO website. Suspicious cases can also be reported directly to the Compliance Officer in verbal or written form.

S IMMO has procedures for investigating business conduct incidents, including incidents of corruption and bribery, in a prompt, independent and objective manner. The Compliance Officer reports such cases to the Management Board, which then decides whether the case should be investigated by Internal Audit department or by an external expert. Following the conclusion of the proceedings, the Compliance Officer presents the result to the Management Board, along with any recommended measures. In accordance with the procedure set out in the Whistleblowing System Directive, the whistleblower will receive a confirmation of receipt of the report within 7 days and a response on the outcome of the investigation within a reasonable time, but not more than 3 months from the confirmation of receipt of the report.

In accordance with the Whistleblowing System Directive, whistleblowers who have submitted reports in good faith may not be subject to any form of penalty, discrimination or disadvantage, even if the initial findings indicate no infringement, or if the facts of the matter turn out to be inaccurate or are not pursued further, provided that the whistleblower did not intentionally submit a false report.

All employees were trained on the topic of whistleblowing via e-learning in 2024. The Compliance Officer, who is responsible for processing whistleblower reports, participated in external webinars or trainings as part of her professional development.

G1-3 – Prevention and detection of corruption and bribery

(G1-3_01)

Anti-bribery and anti-corruption

The Anti-Corruption, Anti-Bribery and Countering of Frauds Policy is based on the UN Convention against Corruption and outlines the principles of conduct and ethical requirements for dealing with corruption. This policy is supplemented by the Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) Policy which is intended to ensure compliance with applicable laws relating to the AML and the CTF.

S IMMO counters the risk of bribery through employee training, cost comparisons, payment authorizations, internal audits and the possibility for third parties to report possible cases of bribery through the whistleblowing tool. S IMMO mitigates the risk of passive bribery by not providing financial or material resources for active attempts at corruption (e.g. against public officials).

The Anti-Corruption, Anti-Bribery and Countering of Frauds Policy and the Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) Policy are published on the Group's website and intranet.

(G1-3_02, G1-3_03)

The 'EQS Integrity Line' whistleblowing tool allows employees and third parties to report violations. Any allegations of incidents that indicate potential violations of the Anti-Corruption, Anti-Bribery and Countering of Frauds Policy, as well as any action suspected to breach the anti-corruption and anti-bribery laws, are promptly investigated by the Compliance Officer. He can report to the Supervisory Board if a member of the Management Board member is involved. If allegations are made against the Compliance Officer, management should be informed immediately.

The results of the investigation are brought to the attention of the Management Board and, in the event of its involvement, to the Supervisory Board. It is the responsibility of the Management Board and the Supervisory Board, respectively, to take concrete measures in regard to the case in question.

Outlook

Expected economic development

Following a moderate economic expansion of 1.1% in the European Union in 2024, GDP growth is expected to come in at 1.5% in 2025 and 1.8% in 2026. In the euro area, economic growth is expected to be slightly lower, at 1.3% in 2025 and 1.6% in 2026. The inflation rate declined again in the EU in 2024 as a result of a drop in energy prices. Inflation is projected at 2.4% for 2025 and 2.0% in 2026. In addition, experts expect the European Central Bank to cut interest rates further in 2025, following several key interest rate cuts in 2024. The key rate is 2.65% as of March 2025.

Expected developments on the real estate markets

After several challenging years in the real estate sector, growth was seen for the asset classes of residential, office and retail properties as well as hotels in 2024. Further expected interest rate cuts in 2025 should lead to consistently positive development on the real estate markets and to an increase in transaction volumes. The lower inflation will likely also have a positive impact on construction, operating and other costs. In addition, rising real household income in the euro area is expected to stimulate demand and thus further drive up prices for residential properties.

Due to the increasing level of regulation and ever stricter requirements for properties in terms of sustainability, demand for energy-efficient and ESG-compliant properties is also increasing – much to the disadvantage of older and/or non-ESG-compliant properties. At the same time, social developments such as increasing digitalisation, more flexible working models including remote working and online shopping must be observed with regard to their implications for the sector.

Details on the economy as a whole and on the individual real estate markets can be found in the Group management report starting on page 77.

Significant events after the balance sheet date and expected business development

Macroeconomic and geopolitical turbulence on a number of fronts had a significant impact on the profitability and market value of the various asset classes in recent years. Against this backdrop, S IMMO has adjusted its strategy on an ongoing basis since 2022. Initially, the focus was on the sale of low-yielding German residential properties, and this was gradually expand-

ed to all properties in Germany in 2023. In the meantime, the German portfolio has been sold off almost entirely, with the final transactions expected to close in the first half of 2025 and the withdrawal from the German market set to be completed during the years 2025/26. Properties were also successfully sold in Croatia, the Czech Republic, Austria and Hungary. Some of the closings took place in January 2025. The resulting liquidity from the sales creates the basis for future growth and earnings.

Focus is being placed on further transactions during the current financial year – in particular, the sales programme in Austria is set to continue, depending on market conditions. A further two properties in Vienna were sold in January 2025.

Along with transactions, the continuous intensification of co-operation within CPI Property Group will be a central area of emphasis in the coming months. CPI Europe (formerly IMMO-FINANZ) has been the sole shareholder of S IMMO since the successful squeeze-out in December 2024. Asset management tasks were already taken over by CPI Property Group in 2024, and synergies are increasingly being realised and departments consolidated in other operational areas, as well. In this context, employees of S IMMO AG have also been transferred to other organisational units within the Group. Further consolidations and measures aimed at optimising the Group structure are planned for the 2025 financial year.

In addition, the ESG strategy was already adapted for the entire CPI Property Group in 2023. Efforts are continuously being made across the Group to harmonise the reporting in accordance with the CSRD and increase the number of Taxonomy-aligned properties.

Vienna, 25 March 2025

The Management Board

Radka Doehring

Pavel Měchura

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