

ENVIRONMENTAL PROTECTION POLICY

I. Definitions:

- a. **Company** - ROBYG S.A. with the registered seat in Warsaw (Al. Rzeczypospolitej 1, 02- 972 Warsaw), entered into the register of entrepreneurs maintained by the District Court for the Capital City of Warsaw in Warsaw, 13th Trade Division of the National Court Register under number KRS 0000280398, tax identification number NIP 525-23-92-367, statistical number REGON 140900353, initial capital: PLN 28,940,119.90 (contributed in full),
- b. **Group Company** - company affiliated with ROBYG S.A. in terms of capital,
- c. **ROBYG Capital Group** - the Company and Group Companies,
- d. **Personnel** - an employee or individual collaborating with ROBYG Capital Group,
- e. **Employee** - an individual employed at ROBYG Capital Group pursuant to an employment contract,
- f. **Regular Collaborator** - an individual providing services to ROBYG Capital Group on the basis of a civil law contract, including under a sole proprietorship carried out on a permanent basis,
- g. **Contractor** - a natural person, legal person or an organisational unit without legal personality that has entered into a contract with a company of ROBYG Capital Group, that has submitted a quotation to a ROBYG Capital Group company or has received a request for proposal from a ROBYG Capital Group company, or that is negotiating with a ROBYG Capital Group company with a view to conclude a contract or is seeking to enter into a business relationship with a ROBYG Capital Group company,
- h. **Management Board** - members of the Management Board and proxies of the Company or a Group Company,
- i. **Supervisory Board** - supervisory board of the Company.

II. Introduction:

ROBYG Capital Group companies have been changing Polish architecture for years, setting trends in the housing industry. The many years of experience in selling flats and creating living space allow us to optimally adapt the estates we build to the needs of the modern consumer.

ROBYG Capital Group actively invests in four major agglomerations: Warsaw, Gdansk, Wroclaw and Poznan.

ROBYG Capital Group is active in the development industry and is engaged in the construction and sale of residential properties. All companies forming ROBYG Capital Group have their registered seats and conduct business activity in Poland.

When selecting Contractors, we are guided by the criteria of responsible business, sustainable development and concern for the environment. We promote openness and dialogue on environmental, health and safety issues. The environmental protection policy of ROBYG Capital Group sets out the general intentions, objectives and directions of its member companies with regard to environmental protection and prevention of climate changes as well as adaptation to upcoming climate changes.

In addition to maintaining compliance with applicable legal requirements, ROBYG Capital Group strives to continuously improve its environmental performance, which is reflected in the implementation of ESG factors. We are committed to ensuring that all operations of ROBYG Capital Group comply with the highest standards, as we regard respect for the environment as one of the strategic elements of management. At the design stage, we analyse the environmental impact of our investments and then seek and strive to implement solutions to minimise and compensate for their identified environmental impact.

We believe that mitigating negative impact on the environment and acting in accordance with the environmental legal requirements concerning us are one of the basic tools for maintaining our high position among Polish residential developers.

III. Principles governing environmental protection:

The economic objective of ROBYG Capital Group - sustainable growth in company value - is viewed by us not only as a purely economic task, but also as social and environmental responsibility. It is, therefore, in our personal interest and that of our stakeholders to actively contribute to the protection of our environment and climate, e.g. by reducing CO2 consumption, increasing energy efficiency, prudent and conscious use of resources, avoiding production of excessive waste and waste water, and protecting flora and fauna together with their habitats (preservation of biodiversity).

ROBYG Capital Group carries out its residential developments in accordance with regulations relating to environmental protection. Conservation of natural resources and socially responsible behaviour are the basis for our long-term growth. We are accountable towards our customers, tenants, Employees, Regular Collaborators, Contractors and investors.

Compliance with applicable environmental legislation is a matter of course for us. Employees and Regular Collaborators have the opportunity to report any identified or suspected violations of these regulations to the Compliance Officer, in accordance with the "Whistleblowing Procedure" adopted. To do so, they can use the communication channels described in the Procedure.

The Company's Management Board bears primary responsibility for environmental issues. In addition, all Employees and Regular Collaborators of ROBYG Capital Group are given the opportunity to make suggestions and raise pro-environmental ideas in the Group's projects and processes. Environmental goals can only be achieved by working together and by undertaking many small steps.

At least once a year, the Management Board will review the existing environmental goals and publish them in the Sustainability Report. This includes the monitoring of CO2 emissions. Information on the implementation of existing environmental objectives will also be prepared. As part of the annual Sustainability Report, the Supervisory Board will review these goals and the extent to which they are accomplished.

The Management Board of the Company is responsible for the implementation of this Policy.

IV. Specific measures and guidelines:

1. Strategic objectives:

Feeling responsible for the environment and the future of generations, we set the following strategic objectives:

1. we seek to reduce greenhouse gas emissions by minimising the use of non-renewable energy sources in the form of fossil fuels and maximising the use of energy from renewable sources, which includes supporting the development of electromobility and micromobility;
2. we seek to reduce or compensate for negative impacts on biodiversity within our operations;
3. we implement on-site solutions for the retention of rainwater and snowmelt and for the reuse of rainwater in the area of ongoing projects;
4. we seek to reduce the use of natural non-renewable resources in the designing, construction and operation of our undertakings;
5. we seek to reduce the occurrence of urban heat island phenomenon by eliminating low albedo surfaces and increasing the share of green and blue infrastructure;
6. we seek to raise the environmental awareness of Employees, Regular Collaborators, collaborators and customers by promoting green solutions and green lifestyle.

Our strategic objectives will be pursued by:

1. using renewable energy in the construction process, installing renewable energy generation systems (including photovoltaic panels) and electric vehicle charging systems at the facilities under construction. Our facilities will be equipped with windows that reduce heat consumption and highest quality building partition insulation, efficient ventilation, cooling, heating and energy management systems,
2. designing and implementing investments taking into account the protection of local biodiversity. We

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preserve and protect existing greenery at the project sites, outside the development zones, using it to shape local natural connections. We compensate for the impact of our investments by implementing new green areas: on garage slabs, roofs, walls, in the form of flowerbeds, hedges, residents' gardens and flower meadows. Our greenery designs involve renouncing from alien species in favour of native plants that are resistant to changing climatic conditions, do not require intensive watering and are melliferous. We provide protection for trees and animals on site. We introduce solutions to reduce light pollution and collision between birds and buildings. We install birdhouses for birds, bees and other insects. We use the support of expert environmentalists for our investments;

- 3) rainwater and stormwater management through integrated water management systems, from rainwater retention at the level of building roofs and garage roofs to retention in the ground or in reservoirs, in accordance with the country's current Water and Wastewater Management Programme. We use ponds, basins, ditches, rain gardens, retention basins, retention and filtration basins, infiltration boxes and green roofs for on-site water retention. We reuse the retained water, e.g. for watering of green areas;
- 4) designing and executing our projects in such a way as to reduce the consumption of raw materials, using, among other things, prefabricated components. We choose production processes characterised by high resource efficiency. We reduce construction waste to the extent possible;
- 5) designing and developing urban spaces with the maximum possible biologically active area with green and blue infrastructure elements. We minimise concrete surfaces to reduce heat build-up and the heat island effect. In addition, our buildings have bright facade colours, we use inverted flat roofs with gravel paving, and we design balconies to shade window openings;
- 6) promoting specific buildings, elements and products that are examples of good practice in green decarbonisation solutions. We carry out analyses and optimisation of the impact of our investments. We establish design guidelines taking into account environmental issues, looking for low-carbon technological solutions and materials with an environmental impact statement (e.g. EPD). We create catalogues of solutions and good practices for our projects. We disseminate knowledge about key environmental issues. We work with NGOs, local foundations and local government bodies to protect the environment and reduce climate changes. We voluntarily commit to reporting environmental emissions as per international standards according to the GHG Protocol for Scope 1 and Scope 2, and then Scope 3.

The most important requirements and rules for environmental measures from the design stage to completion are set out in separate documents forming annex(es) to the design or construction contracts.

2. Procurement of products and services:

ROBYG Capital Group evaluates purchases of products and services throughout their expected life cycle and prefers solutions that are as energy-efficient, environmentally friendly and, therefore, sustainable as possible.

3. Environmentally friendly conduct of customers, tenants, Employees and Regular Collaborators:

ROBYG Capital Group will regularly undertake individual measures to sensitise employees, regular collaborators, customers and tenants to the need to save resources in the use of raw materials and energy.

By means of Internet publications, notices in stairwells and flyers at the customer and tenant service offices (whose energy and environment related conduct can only be influenced to a very limited extent), ROBYG Capital Group will provide information on opportunities to save energy and other resources.

Employees and Regular Collaborators, as part of their general (office) administrative activities, should pay attention to measures that support ecology. This includes various individual actions, such as abandoning paper printouts of documents that are stored electronically anyway, and avoiding unnecessary water, heat and electricity consumption at the offices.

For business travel, preference is given to travel by rail or local public transport. Company vehicles are replaced on an ongoing basis to use only modern and environmentally friendly cars.

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V. Publication:

This regulation shall be effective as of 26.01.2023.

The latest applicable version is published on the intranet