Sustainability: In-Focus

2024



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### Introduction

In 2024, sustainability reporting legislation in the European Union continued to evolve, alongside refinements to existing regulations relevant to the real estate sector. These developments have had a direct impact on our ESG strategy and reporting practices. GCP published its first Consolidated Sustainability Statement in accordance with the Corporate Sustainability Reporting Directive ("CSRD"), aligned with the European Sustainability Reporting Standards ("ESRS"), and inclusive of disclosure in line with the EU Taxonomy Regulation. This Statement addresses all topics identified as material in our 2024 Double Materiality Assessment ("DMA") and fulfils the Company's reporting obligations under the CSRD.

In addition to the required disclosures, we acknowledge the importance of maintaining transparency and ensuring continuity in our reporting. The In-Focus report therefore also includes updates on non-material topics which, although not identified as material in the recent DMA, continue to hold relevance — both in the context of responding to ESG agencies' questionnaires and in relation to our broader sustainability agenda. GCP has consistently addressed several of these topics in previous reporting cycles and remains committed to ongoing improvement in these areas. This approach ensures that our reporting remains comprehensive, forward-looking, and aligned with the evolving expectations of our stakeholders.

Throughout 2024, GCP has continued to make significant progress across the key focus areas within our ESG strategy. This includes further integration of our energy and carbon reduction strategies into our business model, ongoing data collection and continued analysis of employee commuting patterns, aimed at better understanding our workforce's carbon footprint. As part of our energy and carbon strategy integration, we have prioritized retrofitting existing buildings to help minimize our environmental impact. We updated our Biodiversity Commitment in alignment with the Kunming-Montreal Global Biodiversity Framework. In the area of waste management, we provide waste separation facilities across our sites and actively engage with tenants to support effective waste practices. Additionally, in 2024, we conducted asset-level physical climate risk assessments to develop and implement tailored solutions over time.

Our priorities in 2024 remained aligned with the key focus areas of our ESG strategy, including tenant satisfaction, health and safety, and active engagement in local communities.

Throughout this In-Focus report, we offer deeper insights into these focus areas.





Hope Cape Town Foundation / German AIDS Founda



### Environment

## Climate Change Mitigation and Environmental Protection

Our carbon reduction strategy integrates various efficiency improvement initiatives, renewable energy investments, and stakeholder engagement, supported by rigorous governance and reporting mechanisms. These efforts help us monitor progress and uphold accountability. Grand City Properties' Environmental and Energy Policy sets out our management framework for continued improvement across the Company's main environmental impacts, including water use and waste management. In energy management, key objectives include procuring renewable energy and progressively upgrading energy systems during maintenance. The policy establishes a consistent framework of action across the portfolio, with the necessary flexibility to accommodate property-specific characteristics and tenant arrangements.

#### **Energy and Carbon Emissions**

Our practical approach to energy and carbon reduction is embedded in our business model and strategy, focussing on the refurbishment of existing building stock to minimise environmental impact. Key aspects include:

- 1. **Refurbishment-First Approach:** Prioritising the renovation of existing buildings over new construction to minimise energy consumption, construction waste, and environmental impact.
- 2. Long-Term Targets and Goals: Targeting a 40% reduction in CO<sub>2</sub> intensity and a 20% reduction in energy intensity by 2030, along with a transition to certified renewable electricity through Power Purchase Agreements ("PPAs") by 2027.
- 3. Carbon Reduction Strategy: Implementing our comprehensive environmental and energy policy to guide efficiency and renewable energy projects, supported by a Climate Transition Plan to monitor progress and identify improvement measures.
- 4. Investments in Renewable Energy Infrastructure: prioritising investments in solar photovoltaic systems and smart meters to optimise energy consumption. In 2025, GCP aims to increase its total solar PV capacity by 2 MWp, focusing on infrastructure expansion and efficiency optimization to enhance renewable energy generation and reduce carbon footprint.
- **5. Renewable Power Purchasing Agreements:** Transitioning to 100% renewable electricity by 2027, reducing carbon emissions from purchased electricity.
- **6. Green Leases and Internal Carbon Pricing:** Incorporating green lease clauses to promote energy conservation and applying an internal carbon pricing mechanism to assess the benefits of emissions reduction measures.
- **7. Governance and Reporting:** Regularly reviewing climate-related risks as well as environmental and energy policies, while reporting on energy consumption, emissions, and progress towards reduction targets.
- **8. Utilities Data Reporting and Monitoring:** Reporting utilities data based on absolute consumption. Greenhouse gases ("GHG") emissions are documented utilising market-based conversion factors provided by utility providers and location-based conversion factors provided by respective authorities for our countries of operation.

Engaging with tenants is crucial, with a focus on awareness campaigns, and collaboration for energy-efficient renovations. The carbon reduction pathway prioritises inefficient assets for interventions to safeguard or enhance our value, aligning with market standards.

#### **GCP Employee Commuting**

In response to evolving work patterns and a societal shift toward hybrid working between the office and home, we have calculated our Scope 3 corporate emissions related to employee commuting and teleworking for employees based in Germany. These calculations follow the technical guidance of the GHG Protocol for Category 7 Emissions: Employee Commuting.

For the calculation of our employee commuting emissions, we applied the average-data method, taking into account the proportion of time employees worked in the office during the reporting period. This proportion was determined based on recorded employee requests for home working over the year reflecting the corresponding reduction in commuting trips. To perform the average-data calculations, we used data on transport trends in Germany\*.

Our teleworking emissions were calculated based on average household energy consumption in Germany\* and typical usage of home office appliance. We then extrapolated this data using the number of home office hours worked during the reporting period. To estimate the additional energy use from remote working, we applied an intensity benchmark to the estimated floor area of a home workspace to the total household size.

As can be seen in the table below, our Scope 3 emissions related to employee commute increased which is primarily the result of improved digital tracking of home office and in office days leading to more complete data on all German employees.

Table 1\*

Commute Group	GCP 2023 Emissions (tCO <sub>2</sub> e)	GCP 2024 Emissions (tCO <sub>2</sub> e)
On foot	0	0
Bicycle	0	0
Private Motorised Transport	227	282
Public Transport	71	93
Total employee commuting	298	375
Teleworking Emissions	153	168
Total Scope 3 Category 7 Emissions	451	543

<sup>\*</sup> Studie "Mobilität in Deutschland" (2023) - Bundesministerium für Digitales und Verkehr

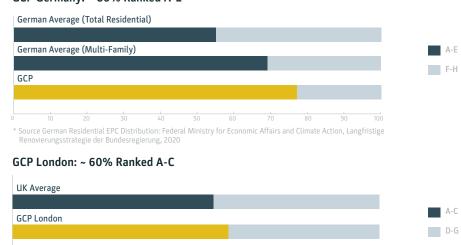
#### **Energy Performance Certificates**

Energy Performance Certificates ("EPCs") are required for most buildings when they are sold or leased. They provide an objective measure of a property's energy performance for prospective buyers or tenants. Under the German system, EPCs must be prepared by a certified third party and are valid for a period of 10 years. EPCs are either calculated based on estimated energy demand due to a building construction (Bedarfsausweis) or actual energy use (Verbrauchsausweis) which is adjusted for climate factors and vacancy rates at the time of certification.

The figures below show the EPC distribution of the Company's German and London residential portfolios based on floor area. As the Company aligns its Climate Transition Plan with emerging EU energy performance requirements set out in the Energy Performance of Buildings Directive ("EPBD") recast, EPCs are utilised as the primary criteria for identifying inefficient assets to prioritise for improvement measures. Germany and EU members are, however, still in the process of setting out their EPBD-aligned reduction pathway based on EPCs for residential and non-residential buildings alike, leaving a degree of regulatory uncertainty.

The UK Government, which is not subject to the EPBD, has committed to set a minimum requirement of EPC by 2030 for residential properties, although open questions remain on the practical implementation of this new requirement. Nonetheless, this updated, and EPC-based approach already allows for more targeted energy audit and renovation planning process relying on real, asset-specific data.

#### GCP Germany: ~ 80% Ranked A-E



<sup>\*\*</sup> Source UK Residential EPC Distribution: Ministry of Housing, Communities & Local Government, Energy Performance of Buildings Certificates Statistical Release October to December 2024 England and Wales

#### **Circular Economy**

The European Union recognises that construction and demolition waste accounts for more than one third of all waste generated in the EU. Although resource use and circular economy was not considered material in the Company's DMA, GCP acknowledges that it can make a major contribution to the environment by minimising waste generation and contributing to a circular economy in general. We focus on implementing sustainable resource management practices to minimise waste generation and conserve water resources.

To set quantitative targets for waste reduction and improved recycling rates, we first develop an accurate baseline by collecting data across our assets. For this purpose, we initiated an agreement for waste disposal with an established waste management provider to streamline reporting capabilities and enhance control over the process. The above-mentioned agreement will also support higher recycling rates.

Waste at GCP originates from operational waste from our assets and tenant-generated waste, alongside construction and renovation projects. While we have yet to formalise a specific circular economy policy, our overarching goal is to reduce overall waste production at our properties and increase the proportion of recycled or reused materials within the circular economy framework.

#### **Tenant Waste Management**

To increase recycling rates, we provide waste separation facilities on our sites and engage with our tenants on their waste management practices. As with other sustainability measures, reducing waste output and landfill volume not only lowers our environmental impact but also helps cut operating costs.

Most of the waste produced in the operation of our properties is outside our direct control. To reduce our environmental impact, we actively engage with our tenants to help reduce their footprint. Our local technical teams and Service Centre are always available to support tenants seeking guidance on waste reduction and sustainability. This coordination and engagement between stakeholders are essential to building a more circular, resource-efficient economy.

We also try to leverage the indirect influence of our properties to encourage more sustainable practices among tenants. This is often done through awareness raising activities. An example: GCP publishes leaflets and provides tenants with informational video content on environmentally friendly practices such as recycling, efficient heating, energy waste avoidance, and proper ventilation of their apartments. GCP continued the previously rolled-out pay-by-volume waste systems, which monitored the volume of waste disposed by tenants and billed them accordingly. These systems are yet to prove effective in inciting meaningful behavioural changes, for example by drawing tenants' attention to the cost-saving benefits of waste reduction. The pay-by-volume waste system did not yield significant evidence of their impact on the actual volume of waste disposed, so extending this initiative to further assets is not to be expected.

As another key aspect of GCP's waste reduction strategy in the properties is the digitalisation of its postal correspondence with tenants and the switch to the new GOGREEN Plus services from Deutsche Post DHL, rolled out in 2023 and successfully continued since then. This means that currently all postal correspondence with GCP tenants, including the energy consumption documentation, is digitally transmitted to Deutsche Post, which offers a climate-neutral hybrid mail dispatch, by email, SMS, fax or post. This substantially reduces the waste generated in the production and delivery of leaflets while also supporting our tenants in reducing their carbon footprint. According to Deutsche Post's GOGREEN Plus certificate issued for GCP, the Company was able to save about 98% of  $\mathrm{CO_2}$ e emissions per mail dispatch. In line with the waste reduction efforts, we also continued expanding our digital invoicing and purchase order process this year, as well as the digital signature of leases. 2024 also saw the rollout of our digital handover protocols. We will of course continue to look for innovative partnerships and strategies to further optimise our resource efficiency in the upcoming years.

#### **Recycling of Construction Waste**

In general, our goal is to preserve existing structures and materials rather than demolish and build new ones. This is advantageous from an economic and ecological perspective.

When it comes to construction-related waste, we maintain a higher degree of control over waste management and recycling processes. Whenever we undertake larger construction and refurbishment projects, we review the type and volume of waste generated, to ensure lawful disposal of hazardous and non-recyclable materials while maximising recycling efforts.

The topic of circular economy is becoming increasingly important for the construction and real estate sector, not least due to the European Union's EU Taxonomy regulation setting a 70% recycling target for the industry. We therefore aim to engage even more closely with our contractors to improve demolition waste recycling and enhance data collection on waste disposal and recycling rates. In line with this, we have updated our standard construction contract templates to include a requirement for contractors to provide recycling data.

Our overarching goal is to preserve existing structures and materials rather than demolish and rebuild, as this approach is both economically and environmentally beneficial.

#### **Metrics: Circular Economy**

Regarding particularities for waste data, it is important to note that most of our portfolio is located in Germany, where local municipalities handle much of the waste collection services and report waste collection in various formats. The figures presented here are based on service provider invoices that allow for direct calculation of waste collected in volume (m³). However, these invoices do not specify the disposal method for non-recycled waste.

To align with best practices in sustainability reporting, we apply conversion factors to convert volume data (m³) into mass data (tonnes). This conversion, however, causes deviations in the relative share of recycled versus non-recycled waste in the two sets of figures as conversion factors differ by waste type based on the density of involved materials. For example, glass is a denser material compared to the materials typically found in general non-recycled waste bins. This results in contrasting results after conversions have been applied, however the Company places its main focus on m³ figures since this matching the primary data we receive from utility providers. In terms of performance, like-for-like waste generation in m³ decreased 12% in 2024 compared to 2023. While there is also a considerable growth in the non-recycled share in the like-for-like data, this is attributed to the conservative extrapolation approach described in the methodological notes at the end to this report assuming all extrapolated waste to be non-recycled, since several utilities do not provide complete information. The increase in absolute waste generated is due to the increase in waste data coverage.

Table 2\*

Waste reported in tonnes and m <sup>3</sup>		Absolute		LfL	
EPRA Code	Metric	2023	2024	2023	2024
		2023	2024	2023	2024
tonnes					
Waste-Abs	Landlord-managed waste recycled (including tenant waste)	2,109 tonnes	1,700 tonnes	667 tonnes	215 tonnes
Waste-LfL	Total landlord-managed waste non-recycled (including tenant waste)	2,764 tonnes	19,324 tonnes	771 tonnes	1,947 tonnes
	Total landlord-managed waste generated (including tenant waste)	4,873 tonnes	21,025 tonnes	1,438 tonnes	2,161 tonnes
m³					
Waste-Abs	Landlord-managed waste recycled (including tenant waste)	51,610 m <sup>3</sup>	41,268 m³	16,629 m³	5,441 m³
Waste-LfL	Total landlord-managed waste non-recycled (including tenant waste)	20,270 m <sup>3</sup>	141,193 m³	5,652 m³	14,277 m <sup>3</sup>
	Total landlord-managed waste generated (including tenant waste)	71,880 m³	182,460 m³	22,281 m³	19,718 m³
Additional in	formation				
Waste-Abs	Proportion of landlord-managed waste generation data that is estimated (including tenant waste) [%]	0%	58%	0%	51%
Waste-LfL	Total waste generation data coverage, by area [m²]	832,295 m <sup>2</sup>	2,919,965 m <sup>2</sup>	283,321 m <sup>2</sup>	283,321 m

<sup>\*</sup> The increase in coverage was achieved through adopting an estimation approach extrapolating invoices received for partial periods across the whole year. The approach applied is conservative based on the invoices received and does not apply an average-based approach to whether waste is recycled, resulting in a likely understatement of the recycled share and an overstatement of the non-recycled share.

#### **Water Management**

Although the topic of water and marine resources was not identified as material during our DMA, we recognise the importance of responsible water management, and the potential negative environmental impacts arising from unsustainable practices. Sustainable water use has been established as a key environmental priority under the EU Taxonomy, reinforcing its relevance. In line with this, we are promoting efficient water use across our portfolio and aim to comply with the high standards for water quality and wastewater disposal set at EU and national level.

We seek to positively influence tenants' water consumption, through engagement programs and advanced measurement technologies. The Company is exploring investment in smart water meters to improve data accuracy, identify inefficiencies, and enable leakage detection while providing tenants with accurate information about their water usage. Based on these insights, we seek to implement technical improvements to reduce water consumption in our properties wherever feasible. Pilot projects for this initiative were initiated in 2025.

The Company added a Water Resource Specialist to our team in 2023, acknowledging that this topic is of increasing importance and needs to be addressed separately from the Energy Department who have previously managed water resources. The specialist works closely with relevant stakeholders and management to ensure that water-related risks and initiatives are effectively managed in alignment with the Company's broader sustainability strategy. A Water Management Policy and Procedure were also developed, establishing a unified framework for managing water resources at operationally controlled and owned assets, outlining our current water strategy, water management, and water-related procedure principles. The Water Management Procedure also provides further information to Asset and Property Managers on improving sustainable water usage at assets in our portfolio.

#### **Metrics: Water Management**

Our water management strategy is outlined in the section above. In order to track the progress of our approach, we collect water consumption data from our assets and monitor this year on year as shown in table 3. Due to restrictions on tenant data sharing, water consumption recorded through tenant submeters is included in our overall landlord-obtained water consumption figures. In 2024, like-for-like water consumption decreased by 16% compared to 2023, partly attributable to improvements in data accuracy described in the methodological notes at the end of this report.

Table 3

Absolute and like-for-like water consumption for managed assets						
Water reported in m <sup>3</sup>		Abso	lute	Lf	L	
EPRA Code	EPRA Code Metric		2024	2023	2024	
	Total landlord-obtained water consumed (including tenant submeters)	4,336,332 m <sup>3</sup>	3,945,120 m <sup>3</sup>	4,336,332 m³	3,622,102 m <sup>3</sup>	
Water-Abs Water-LfL	Proportion of landlord- obtained water consumption data that is estimated (including tenant submeters)	18.61%	55.53%	18.61%	52.54%	
	Total water consumption data coverage, by area (sqm)	3,574,928 m <sup>2</sup>	3,895,773 m <sup>2</sup>	3,574,928 m <sup>2</sup>	3,574,928 m <sup>2</sup>	
Total building	Total building water intensity					
Water-Int	Building water intensity for all water consumed (m³/m²*year)	1.21 m³/m²	1.01 m <sup>3</sup> /m <sup>2</sup>	1.21 m³/m²	1.01 m <sup>3</sup> /m <sup>2</sup>	

#### **Biodiversity and Ecosystems**

While Biodiversity and Ecosystems were not identified as a material topic in our DMA, we remain aware of the need to and benefits of contributing positively to biodiversity at our sites. Therefore, in 2024, GCP updated its Biodiversity Commitment, informed by the 2050 Goals and 2030 Targets of the Kunming-Montreal Global Biodiversity Framework. The revised commitment prioritises integrating biodiversity considerations into projects, with an emphasis on urban green spaces, nature-based solutions, and sustainable development. The Company adopts a proactive approach, applying the mitigation hierarchy (avoidance, minimisation, and restoration), and fostering community engagement, reaffirming its responsibility to support biodiversity and build a resilient environment. The updated Biodiversity Commitment is scheduled to be publicly available in the Company's website by summer 2025.

As part of our environmental strategy, the Company invests in outdoor spaces to enhance biodiversity. This includes the design of green areas, where we avoid the use of pesticides and herbicides, and actively engage local communities in installing birdhouses and insect hotels. These initiatives strengthen community involvement and raise awareness of practical actions that residents can adopt in their own homes.

To further integrate environmental protection within our operations, the Company has implemented a program focused on planting and maintaining trees in public areas. This initiative enhances local biodiversity by creating habitats for various species in urban areas. In 2024, the Company collaborated with an external company to carry out façade cleaning and tree planting. In 2025, we plan to resume tree planting efforts directly, reaffirming our ongoing commitment to sustainability and environmental stewardship.

#### **Climate Change Adaptation and Resilience**

Although Climate Change Adaptation was not found to be material in the 2024 DMA, the Company remains committed to understanding and preparing for the physical risks of climate change. As reported in previous years, the Company's Building Resilience Task Force conducted a city-level physical risk assessment in 2022 involving four warming scenarios (SSP1-2.6, SSP2-4.5, SSP3-7.0 and SSP5-8.5 from the CMIP6 consolidated climate models) involving 20 of its strategic-focus cities. While none of the assessed assets are situated in areas exposed to high water stress risk, the results indicated significant long-term development in five climate-related physical risks considered: extreme heat, drought, wildfire, fluvial flood, and coastal flood. From these results, the Building Resilience Task Force developed an overall climate adaptation plan involving implementation of the following measures from 2022 through 2027, selected based on potential to bolster asset resilience while also considering their feasibility:

- Refurbishments: Review of materials chosen at sites which are at risk, and roof maintenance works.
- Tenant guidebook for extreme conditions: Creation of a behavioral guide for tenants to deal with extreme climatic conditions, including definition of the internal and external notification chain in such emergency circumstances.
- Flood analysis and planning: Asset-level analysis of flooding and drought to determine countermeasures. Development of flood scenario plans and emergency plans.
- Tree planting program: Planting and maintenance of trees in public areas where this leads to a positive effect, and unsealing spaces to create more green areas around buildings.

Tenant guidebooks were already implemented while targeted flood risk assessments were conducted in Germany in 2023. In 2024, the Company continued to collect relevant information on which measures support adaptation to specific climate hazards through its Adaptation Toolbox meant to provide internal guidance. While the benefits of trees and green areas for climate change adaptation are clear, professional and site-specific assessments are needed to ensure effective heat reduction through tree planting. Refurbishment materials are also highly asset- or project-specific with a strong link to energy measures. As such, considerations of these measures are being integrated into the actions underway to transition to asset-level adaptation planning measures discussed in our Consolidated Sustainability Statement 2024.

## Social

#### **Tenant Satisfaction Survey and Retention Program**

GCP implements a structured, year-round feedback mechanism. Following the resolution of a tenant enquiry through its Service Centre, tenants are invited to complete a satisfaction survey. The overall tenant satisfaction rate is derived by averaging tenant responses across five key indicators—resolution time, service provider friendliness, quality of completed work, service centre accessibility, and service centre friendliness—each rated on a 5-point scale. This average (4.6) is then expressed as a percentage of the maximum possible score (5), resulting in a 2024 satisfaction rate of 92.0%. The survey achieved a coverage rate of 91.5%. Further details on the satisfaction survey results are provided in Table 4.

Table 4

Key Figures Tenant Satisfaction 2024						
Tenant Satisfaction Indicator	Unit	2024	2023	2022	2021	
Tenant rating of resolution time	Out of 5	4.53	4.54	4.78	4.75	
Tenant rating of company friendliness		4.54	4.66	4.91	4.75	
Tenant rating of the quality of the completed work		4.50	4.55	4.72	4.75	
Tenant rating of service center accessibility		4.68	4.75	4.88	4.82	
Tenant rating of service centre friendliness		4.67	4.83	4.9	4.83	

As part of the Company's ongoing efforts to enhance tenant satisfaction and retention, it has implemented a comprehensive loyalty program accessible through the GCP App. This program rewards tenants with points for various activities and milestones, including:

- Years of Tenancy: Tenants earn points for each year they maintain their tenancy with the Company.
- Timely Rent Payments: Points are awarded for paying rent on time.
- Green Energy Certification: Additional points are awarded to tenants who opt for ecofriendly energy solutions.
- Insurance: Points are awarded for maintaining valid tenant insurance.
- Digital Tenant Engagement: Tenants also earn points for participating in activities such as GCP digital advent calendar.

In addition to the digital rewards, GCP offers various on-site tenant engagement activities, such as:

- St. Nicholas Day Events: Offering special activities and treats for tenants.
- Open-Air Cinema: Outdoor movie nights during the summer.
- Summer Festivals: Community gatherings at our asset locations.

These initiatives not only enhance tenant satisfaction but also foster a sense of community, contributing to higher retention rates and overall tenant happiness.

#### **Tenant Health and Safety**

Although Tenant's Health and Safety risks was not identified as material topic in the 2024 DMA, it continues to be a priority for Grand City Properties. Keeping high standards of health and safety within our buildings is a fundamental obligation to our tenants, and a prerequisite to ensuring their satisfaction with our service. Through the dedication of our property management teams, we work continually to instil a positive health and safety culture across our operations. Our goal is to protect tenants and third parties from health and safety risks, and to deliver a living environment which is healthy, safe and motivating, with which our tenants are satisfied.

To guide the implementation of our sustainability strategy, guarantee the highest health and safety standards and track our progress, we have set a long-term goal to create a high standard of living at our properties through safe, attractive buildings, active community building and engaging customer service.

Health and safety are central to our asset management approach at every stage of a property's lifecycle.

During operation, we pursue our aim to continually enhance the quality of our residential units and their surroundings. Through regular checks and maintenance work conducted by our operational teams, we seek to identify and mitigate potential health and safety risks before they materialise. Safety is a priority throughout these assessments. If deficits are identified, these are documented and reported to the Construction Department who are then responsible for seeing that the required work is carried out. The proper implementation of these corrections is confirmed by appropriate follow-up processes, through cooperation between the Construction Department and the Property Managers.

Our Tenant Health and Safety Guidelines set out basic principles of how health and safety is ensured and outline works and checks completed for prevention, including installation of smoke detectors, functioning heating systems, mould prevention and tidiness and cleanliness of our assets.

All our properties are subject to continuous safety inspections as part of our operational monitoring activities. The quarterly site inspections performed according to our internal protocol are routinely conducted. These comprise scheduled visual inspections of health and safety aspects. The combination of these regular site visits also helps to prepare budget decisions for each property.

Our Human Rights Policy also details our commitment to protecting the human rights of our tenants. It has been written in accordance with the UN Guiding Principles on Business and Human Rights and in particular respects the privacy of our tenants through data protection measures. Any and all reported violations of human rights are recorded by our Compliance Department and reported directly to our CEO and a member of the Board of Directors. We are committed to reporting human rights violations and include this risk within our risk management process.

#### **Metrics: Tenant Health and Safety**

Table 5

Asset Health and Safety'					
EPRA Code	Units of Measure	Metric	2024	2023	
H&S-Asset	Percentage of assets for which health and safety impacts are assessed or reviewed for com- pliance/improvement	Percentage of assets	95%	92%	
H&S-Comp	Number of incidents of non-compliance with regulations and/or voluntary standards	Number of incidents	1	1	

<sup>\*</sup> This metric is reported regarding the German portfolio only

#### **Neighbourhood Development**

At GCP, community engagement involves fostering meaningful interaction with the broader community, including tenants, local authorities, and community organisations. The Company's three-tier support system - comprising regional asset managers, property managers responsible for day-to-day tenant care, and facility managers overseeing technical support and maintenance - ensures high-quality service and fosters strong, lasting relationships with both tenants and the wider community. This structure enables the Company to remain responsive to local needs and aspirations.

To nurture vibrant and supportive communities, where people enjoy living and staying, GCP strives to foster a sense of connection and neighbourliness. The Company provides a variety of communal amenities such as playgrounds, fitness trails, BBQ areas, tenant libraries, and seasonal events. In addition to the assistance offered by property managers and our Service Centre, tenants benefit from dedicated support roles including a collector and a social tenant's manager. These professionals offer guidance on issues such as communication with local authorities and the implementation of community projects. In locations without a designated community relations officer, property managers also serve as the primary contact for tenant engagement, ensuring active communication and support.

Neighbourhood development is another key pillar of GCP's social impact strategy. Beyond maintaining and upgrading its residential portfolio, the Company seeks to support active urban areas and create inclusive spaces that benefit the broader community. In this context, GCP collaborates with a third-party partner to repurpose selected units into vibrant creative hubs. This project offers affordable studio spaces for local artists and fosters cultural exchange through exhibitions, events, and community engagement. The project includes educational formats that promote artistic exchange and participation, such as artist residencies, guided exhibitions, and interactive programmes designed to make contemporary art more accessible.

#### **Enhancing Our Commitment to Communities: 2024 Guidelines Update**

In 2024, the Company updated its Community Involvement and Development Guidelines to reinforce its commitment to social responsibility and enhance its positive impact on the communities in which it operates. The updated Guidelines establish a clear framework focused on four key areas: proactive engagement with residents, local authorities, and organisations; promoting inclusive, safe, and vibrant neighbourhoods through sustainable development; conducting regular assessments and transparent reporting on social impacts in alignment with EU sustainability standards; and supporting targeted social initiatives through the GCP Foundation. These updates provide employees with a clear and actionable

roadmap for enhancing the wellbeing of both tenants and surrounding communities through locally tailored and meaningful initiatives.

#### **GCP Foundation and Community Engagement Initiatives**

The GCP Foundation donates funds to support community projects and neighbourhood development initiatives, inter alia supporting youth, the elderly, and poverty relief. The GCP Foundation is run by the GCP Foundation Board. All employees are encouraged to propose projects for consideration, with each department and individual empowered to suggest initiatives within their region. The GCP Foundation Board ensures that funding is directed towards projects that will have the most significant positive impact on local communities and their residents.

GCP is committed to actively engage with the communities surrounding the residential properties in which it invests. By funding neighbourhood events, shared public spaces, and cultural programs, the Company fosters social integration in areas affected by urban development. In 2024, our initiatives and events have included:

- GCP Cinema Summer: Live open-air cinema at 8 locations, plus 800 additional cinema boxes for a home movie night (3,735 participants)
- GCP Advent Calendar: Interactive calendar from Dec. 1st to 24th, featuring daily games, quizzes and surprises, as well as a main prise a 50€ voucher (27,504 participants)
- GCP Halloween World: Digital Halloween craft activities with daily interactive tasks
- GCP Easter Week: Digital Easter week campaign with daily interactive activities

Some of these events have evolved into long-standing traditions, with invitations for participation actively promoted through various channels to foster engagement. The strong participation rates, highlight the positive reception of these initiatives. The Company takes great pride in this success and remains dedicated to expanding and enhancing its community engagement efforts in 2025.

#### **Charitable Activities**

In line with its commitment to enriching local communities, the GCP Foundation allocates funding to various charitable organisations and initiatives. These include support for youth and elderly care, arts and culture, education and vocational training, social welfare, and sports. The GCP Foundation also assists refugees, displaced persons, victims of war, and individuals persecuted for political, racial, or religious reasons. Additionally, it promotes commemoration efforts, supports victims of discrimination based on gender identity or sexual orientation, and engages in development cooperation and other charitable causes.

In 2024, the Company spent approximately €400,000 to support local and international community projects. This included funding vocational training for 40 disadvantaged young people in South Africa, aiming to improve the lives of vulnerable children, youth, and families. Further support was directed towards initiatives offering housing and holistic care for homeless mothers and children, as well as contributions to a hospice providing essential end-of-life support.

#### **Social Day**

In addition to tenant-focused activities, GCP encourages its employees to give back to the community through its Social Day initiative. This program allows employees to dedicate a paid working day to volunteering with charitable organisations that create meaningful social impact. Participants can either join a suggested organisation or select a cause of their own choosing.

In 2024, the Company organised four Social Days. This year's efforts focused on supporting Tafel e.V., an umbrella organisation comprising over 970 food banks in Germany. Employees across Germany took part in volunteering activities that supported Tafel's mission to reduce food waste and combat poverty by redistributing surplus food to those in need. These initiatives enhanced the Company's social impact while fostering a culture of community involvement across its workforce.

Furthermore, what has traditionally been an annual employee blood donation event was expanded in 2024 to two separate donation days—held in June and October—at our Berlin office. Building on this success, the Company aims to further expand the Social Day initiative in 2025, reaching even more employees across additional regions.

#### **Metrics: Community Engagement**

GCP continues to prioritise meaningful local engagement across its portfolio. Table 6 presents the percentage of assets under operational control that have implemented local community engagement initiatives, impact assessments, and/or development programmes.

Table 6

Community En	gagement			
EPRA Code	Units of Measure	Metric	2024	2023
Comty-Eng	% of assets under operational control that have implemented local community engagement, impact assessments, and/or development programmes	Percentage of assets	58%	75%

We note that the decrease from 75% in 2023 to 58% in 2024 is primarily due to changes in how we engaged tenants around events and community activities. Whereas in 2023, we sent outreach letters to individual tenants, in 2024 - in line with our digitisation efforts - we replaced physical letters with public notices on tenant notification boards in building entrances and digital channels, i.e. information in the GCP Tenant App and the Company's website. Although this allowed us to engage a more diverse audience among our tenants and also included other community members, it required a change in engagement reach calculation, causing a drop in engagement figures in 2024 in comparison to 2023.



pen Air Cinema, Erkrath

#### **Employee Health & Wellbeing**

We ensure strict compliance with all workplace health and safety regulations at national and EU level. The Group has a dedicated internal Office Health and Safety Manager who implements our Occupational Health and Safety ("OHS") Policy. GCP recognises that every employee plays a vital role in maintaining a safe and healthy workplace. This includes actively identifying and reporting unsafe conditions, breaches of safety protocols, and workplace incidents. To support this shared responsibility, GCP HR Roundtables foster open communication and consultation with employees on all work-related matters including health and safety, ensuring their insights contribute to ongoing risk prevention and the continuous improvement of safety practices. Work-related injuries, ill-health and accidents are investigated in accordance with the Company's OHS Policy. The Company's physician conducts site inspections to check occupational health and safety provisions, as well as periodic workstation ergonomics assessments. Findings are documented, prioritized and integrated into site-specific action plans to reduce or eliminate risks. In the case of accidents, root cause analysis is carried out to identify underlying issues or hazards to ensure appropriate corrective and control measures are in place. Lessons learned are shared across the Company through training and other awareness programs, to prevent recurrence.

We set short-term targets to manage material health and safety impacts, risks and opportunities. In addition to our mandatory OHS training for all employees, we offer first aid training to our employees internally, across our Berlin and regional offices. 85 employees are certified first-aiders, representing about 10.2% of our total employees, which exceeds the 8% targeted for 2024. Training participation and effectiveness are regularly evaluated to ensure high standards are maintained. We will continue to provide these trainings for employees in coming years.

To promote employee well-being, we offer a flexible package of benefits and working provisions, including eye examinations for employees who spend a significant amount of time working with computer. In recognition of the growing demand, the Company has doubled the number of offered eye examination days — from 4 days in 2023 to 8 examination days in 2024. Looking ahead, we will continue to review and adjust the number of examination days based on employee needs. In addition, one of our key 2025 targets is the creation of a digital solution to streamline the eye examination process, making it more accessible and efficient for all employees. We also have a cooperation agreement with an optical retailer offering subsidised glasses to employees since 2022.

All GCP employees have access to mental health appointments with a mental wellbeing coach at our headquarters. We also ran 2 flu vaccination days in our offices during 2024 and intend to continue in 2025. Employees at our Berlin headquarters can use our company gym with personalised training and nutrition programs offered by the trainers, including a specific course for employees suffering

from back problems. There is also access to a health and wellbeing subscription service platform, which includes gym subscription, subsidized by the Company for all its employees in Germany.

#### **Employee Engagement Survey**

GCP interacts with its employees through various channels, including annual employee engagement survey to gather direct feedback from all staff members. Oversight of this survey falls under the responsibility of the Company's Head of HR, with results informing decisions and actions to address current and potential issues.

The 2024 employee engagement survey achieved a 71% response rate among all Company's employees in Germany. The survey explored a wide range of subjects relating to employee interactions, including those with management, the Company, and among colleagues. Responses were measured using a 5-point likert scale, where 5 represents the highest level of satisfaction and 1, the lowest. The average engagement score across all topics was 3.8 out of 5.0, reflecting a relatively high engagement level of approximately 76%.

Topics such as "Goals and Goal Achievement", "Relationship with Manager", and "Autonomy" received the highest ratings. Conversely, "Strategy, Vision and Culture", "Feedback and Communication", and "Workplace and Tools" received comparatively lower scores and have been prioritized for further enhancement. Notably, no topic scored below 3.5 out of 5.0, highlighting the Group's consistent efforts to foster positive employee experience and an engaging work environment.

Based on the survey feedback, we have identified key improvement areas and have developed strategic actions for 2025, while also continuing the implementation of successful initiatives launched in 2024 (refer to the S1 section in our 2024 Consolidated Sustainability Statement for further details).

#### **Labour Practices**

The Company ensures that all paid overtime work is accurately documented and compensated in accordance with applicable labour regulations and internal guidelines. Employees working hours are monitored through a time-tracking system to engender transparency and improved time management.

In addition, emphasis has been placed on ensuring that employees utilize their full paid annual leave entitlement. The HR department and supervisors proactively encourage employees to schedule and take their annual leave balances. This approach supports employee wellbeing and maintains productivity in the Company.

## Governance

#### **Board of Directors**

The Company is administered by a Board of Directors vested with the broadest powers to perform and manage in the Company's interests. All powers not expressly reserved by the Luxembourg Companies Act or by the articles of association to the general meeting of the shareholders fall within the competence of the Board of Directors. On a regular basis, the Board of Directors evaluates the effective fulfilment of their remit and compliance with corporate governance procedures implemented by the Company. This evaluation is also performed by the Audit and Risk Committees. The Board also remains attentive to matters of business ethics and regularly considers ethical risks as part of its oversight responsibilities.

In 2024, the Board of Directors conducted 55 meetings. The table below shows the attendance of the Board members, as well as the attendance average:

Table 7

Director	Meetings attended	Percentage attended
Christian Windfuhr	53	96%
Simone Runge-Brandner	52	95%
Markus Leininger	54	98%
Scot Wardlaw	32	100%
Monica Porfilio	32	100%
Board Average	45*	98%

<sup>\*</sup> The board average attendance is based on simple average, which ignores the fact that the total number of board meetings possible was not the same for all members. Scot Wardlaw and Monica Porfilio had 32 possible meetings as both joined the GCP Board in June 2024, while the other directors had 55 meetings possible. Therefore, the average attendance expressed in terms of percentage provides a more meaningful insight

The composition of our highest governance body is summarised in the following table:

Table 8

Composition of	Composition of the Highest Governance Body						
EDDA CI-	Units of	BA - 4	202	24	2023		
EPRA Code	Measure	Metric	Number	%	Number	%	
	Executive board members	1	20%	1	33%		
	Total numbers and percentages	Independent board members	3	60%	2	67%	
Gov-Board		Non-executive board members	1	20%	0	0%	
GOV-BOARD		Independent / non- executive board members with competencies relating to environmental and social topics	2	50%	2	100%	
		Average tenure (years) on the Board of Directors	3.7	N/A	4.9	N/A	

The ESG, Audit, Risk, Remuneration, and Nomination Committees support the Board, along with an Advisory Board. The Committees receive regular training on legal updates, regulatory, sector-specific knowledge, capital markets, and ESG matters. This proactive approach not only ensures sound knowledge of corporate governance among our Board members, but also serves to advance sustainability goals outlined by the United Nations, particularly through ESG initiatives.

#### **Executive Management**

Management share ownership aligns the interests of company leadership with those of shareholders, fostering long-term value creation and responsible corporate governance. When managers are also stakeholders, they are more likely to consider the financial, social, and environmental impacts of their decisions. This alignment supports sustainable business practices and demonstrates a commitment to the company's enduring success.

Table 9

КРІ	Individuals Involved	Value
Average shares held as multiple of base salary	Daily Management	0.45
% of outstanding stock owned	Daily Management	0.05

Additionally, the company regularly monitors its CEO-to-employee pay ratio to allow our stakeholders and ourselves to understand the extent of executive compensation relative to the broader workforce, particularly in the context of social equity and responsible governance.

Table 10

Metric	2024
CEO-to-employee pay ratio (median compensation)	37
CEO-to-employee pay ratio (mean compensation)	28

#### Responsible Dealings, Industry Associations, and Policy Alignment

The Company's Anti-corruption Policy prohibits direct engagement in lobbying and political involvements, including donations to political parties and facilitation payments. Facilitation payments being an unofficial payment made to public officials or bureaucrats intended to expedite or secure the performance of routine governmental actions to which the payer is legally entitled.

Table 11

Key Figures	Unit	2024	2023	2022
Monetary contribution to lobbying and interest representation	€	0	0	0
Monetary contributions to local, regional or national political campaigns/ organisations/ candidates		0	0	0
Monetary contributions to trade associations		30,718	26,415	26,342
Total political contributions and spending on public policy		0	0	0

While GCP does not directly engage in lobbying activities or make donations to political parties, the Company recognises the pivotal role of trade associations in shaping policies and influencing societal actions. We view them as appropriate platforms for engaging with emerging climate policy, as well as sustainability reporting and overall ESG topics relevant to the real estate sector in the EU. When selecting and renewing our memberships, we consider how closely organisations' values and commitments align with our sustainability ambitions. We are members of the German Property Federation (Zentraler Immobilien Ausschuss, "ZIA"), the European Public Real Estate Association ("EPRA"), and the German Sustainable Building Council (Deutsche Gesellschaft für Nachhaltiges Bauen, "DGNB"). As of the time of this publication, our internal review of the climate positions of these associations has found a high degree of alignment with our own policy positions. However, if misalignments are identified in the future, the Company

would first engage the relevant organisation to address the misalignment, and in the case of irreconcilable differences terminate its membership.

ZIA advocates for energy efficiency and sustainability standards in the real estate sector, striking a balance between ambition and pragmatism — particularly when dealing with older building stock prevalent in Germany. The association supports the German Energy Saving Ordinance and the EU Energy Performance of Building Directive, champions the Climate Action Plan 2050, and promotes Germany's Energy transition by advancing the integration of renewable energy in buildings. ZIA also endorses smart technologies to optimise energy usage as well as supports fair carbon pricing to develop effective climate policies aimed at reducing emissions.

Similarly, EPRA supports the European Green Deal's aim for climate neutrality by 2050. To achieve this, it promotes building energy efficiency and the integration of renewable energy as key strategies for reducing carbon emissions across an entire building lifecycle. It advocates for the use of sustainable technologies like smart building solutions and supports standardised reporting of carbon footprints and energy usage to ensure transparency and environmentally sound investments.

Meanwhile, DGNB develops internationally-recognised certification systems for sustainable buildings. Key focus areas for DGNB are stressing decarbonisation throughout the building's lifecycle, promoting the use of renewable energies, and sustainable materials and retrofitting existing buildings to improve energy efficiency. DGNB certifications require comprehensive lifecycle assessments that evaluate environmental impacts from construction to demolition, aiming to minimise resource use and enhance occupants' quality of life.

These associations ensure the integration of sustainable practices that yield real benefits, which significantly influence our strategic environmental initiatives.

#### **Governance of Data Protection and Information Security**

GCP has a deep commitment to protecting the privacy of our stakeholders' data. We believe data protection and information security are key aspects sitting within our governance responsibilities, and every organisation should have strong data protection governance in place. Our Information Security and Privacy Strategy is continuously evolving, led by our internal cybersecurity experts, who actively work with senior management through the Information Security Steering Committee to ensure that data security is fully integrated into our top-level risk management framework.

In 2024, as part of our proactive approach to risk management, we conducted internal audits across our office branches. These audits, alongside regular testing such as security drills, breach response exercises, and vulnerability analysis, serve to assess the efficiency of escalation procedures and robustness of our information security framework. Under the independent oversight of the Data Protection Officer and the information security team, compliance with GDPR and ISO 27001 was ensured. In addition, key areas covered under our internal Global Information Security Policy include data protection and integrity, as well as information security-related business continuity planning. These audits and measures demonstrate strong compliance across the organization, while also highlighting opportunities for further improvement, ensuring that the company's monitoring and response procedures are adequately prepared against security threats.

Concerning third parties, our Business Partner Code of Conduct places data protection and information security on partners and service providers. The cybersecurity team also reviews the information security framework of third parties before data is shared or system integration occurs.

We monitor potential security incidents and data protection breaches as an indicator of the effectiveness of our operational procedures. In 2024, we experienced one data breach. The incident was thoroughly investigated and remediated, including a comprehensive root cause analysis to ensure such an event does not recur.

In the event of any confirmed incident, a response team is formed to immediately investigate the matter and recommend remedial actions to prevent a similar occurrence.

#### **Approach to Digital Transformation**

GCP recognizes the importance of Digital Transition as a cornerstone of its innovation, aimed at equipping employees to effectively adapt to evolving digital tools, technologies, and work processes. The company has developed and implemented an internal training course focused on the responsible and effective use of artificial intelligence ("AI"). The course, titled "Understanding the EU AI Act", is mandatory for all employees across the organization. This course is designed to support the integration of AI into daily work routines while ensuring alignment with the legal and ethical requirements set forth by the EU AI Act. By combining practical skill development with a strong emphasis on ethical considerations, the course reflects GCP's broader vision of fostering a digitally competent, resilient, and ethically responsible workforce. In addition, workshops have been conducted with employees to identify how AI can be used to improve productivity in their day-to-day tasks while brainstorming concrete approaches to integrating its use into their roles and procedures.

#### **Approach to Taxation Statement**

The Company follows a tax policy based on a clear set of principles that guide its approach to tax management. The key principles of the Company tax policy are listed below:

- Commitment to adherence to all relevant tax laws, regulations, and reporting requirements in each jurisdiction where we operate. External advice is sought where appropriate.
- The governance structure includes a professional in-house tax department led by the Tax Director who is responsible, among others, for recommending the tax policy and once approved executing the overall tax policy. Material issues, if they exist, are reported to the CFO.
- Maintaining a healthy cooperation and communication with tax authorities
- Ensuring legal compliance with all tax affairs and regulations on a subsidiary and Company level.
- Transfer pricing for transactions between Company entities located in different tax jurisdictions are to be determined using the arm's length principle.
- Tax structures, if exists, will have commercial and economic substance.
- The Company tax policy is approved by the Board of Directors.

#### **Approach to Risk Management Statement**

The company's risk management ("RM") follows the Committee of Sponsoring Organisations of the Treadway Commission ("COSO") Enterprise Risk Management ("ERM") framework, identifying, evaluating, and monitoring risks based on their impact and probability while also determining the risk appetite, as well as considering the effectiveness of controls to mitigate them.

Roles and Responsibilities:

- **Board of Directors:** Leads the RM strategy, ensures its own independence, delegates responsibilities, aligns with the Company's risk appetite, and communicates through policies and documentation.
- **Risk Committee:** Reviews RM system effectiveness and coordinates with other committees, particularly on ESG and non-financial risks..
- **Chief Risk Officer ("CRO"):** Supports senior management in risk identification, assessment, mitigation, and action plans, reporting to the Risk Committee and Board.
- **Employees:** Assigned risk owners act as "first line of defence" by monitoring risks.

	Board of Directors	Risk Committee	Other Committees	Senior Management	CRO	Employees
Identification of risks		Х	х	Х	Х	х
Tolerance level definition	Х					
Risk evaluation				Х	Х	
Risk mitigation				Х		х
Supervision	Х	Х	Х		Х	
Reporting				Х	Х	х

#### The Company:

- Understands strategic objectives.
- Assesses the business environment.
- Identifies and evaluates risks in terms of their likelihood and magnitude.
- Monitors controls and mitigating activities.
- Reviews processes and establishes risk appetite.
- Assesses risks via key risk indicators ("KRIs") and takes corrective actions.

Reviews occur regularly, at least annually, with immediate action on ad-hoc issues. Risks are displayed on a Risk Heat Map. The company maintains zero tolerance for legal breaches, fraud, and corruption.

## Methodology and EPRA sBPR Data Preparation Notes

The following methodological notes provided in the Consolidated Annual Report 2024, p. 90-94 apply to the EPRA sBPR Indicators found in this report:

- Organizational boundaries
- Coverage
- Landlord and Tenant Boundaries
- Reporting period
- Segmental Analysis
- Disclosure on Own Offices

The remainder of this section outlines the notes specific to the EPRA sBPR indicators presented in this report.

#### **Estimation of Utility Consumption**

The total volume of waste is based on the contracted waste volumes at properties where this information was available, and in cases where this is not available for the entire year invoices available are extrapolated to cover the full year. Cases where extrapolation of waste data is required are generally those where incomplete information was found from utilities regarding the recycled share of waste. In the spirit of taking a conservative approach to dealing with missing information, the Company assumes all of the extrapolated waste to be not recycled which might cause an overstatement of non-recycled waste and an understatement of recycled waste. The conversion of waste from cubic meters to metric tonnes is also based on obtained averages from public organizations or utility providers to the extent that they have been made available, although a degree of uncertainty remains since some recycling containers contain a mix of materials with varying densities.

In cases where water data is only received for a portion of the reported year, this data is also extrapolated to cover the entire reporting period. An important improvement was made in 2024 data collection regarding improved mapping of main- and submeters which improved the accuracy of this data.

#### Restatements of Information

Due to further enhancements made on operational data, some properties included in last year's water and waste figures have been identified as being managed by the tenants. As a result, utility consumption data of these assets has not been changed, but changes in aggregated figures have occurred associated with the changes in assets included to more precisely align with the Company's definition of the operational control scope.

As explained in the Consolidated Annual Report 2024 p. 90-94, the basis for intensity figures per square meter has been changed from Net Lettable Area ("NLA") to Gross Floor Area ("GFA") to align with best practices in sustainability reporting. 2023 intensity figures have thus been restated with GFA as the denominator.

Regarding waste data, the conversion factors for translating data for each specific waste type from cubic to metric tonnes was updated retroactively for 2023 data to improve accuracy.

Regarding water data, improvements were also made concerning the mapping of main- and submeters allowing for more accurate information.

Employee commuting and teleworking 2023 figures have been restated after more recent location-based statistics were made available and improvements from the digitalized tracking of in-office and home office days were integrated.

#### **Units of Measurement and Normalization**

Utilities data are reported based on absolute consumption or measured in cubic meters (water and waste) and metric tonnes (waste). Water consumption has been normalized through calculated intensity indicators using floor area (square meters) for whole buildings, including tenant areas in order to provide a representative figure.

#### **Narrative on Performance**

Explanation and analysis of our performance in relation to the Performance Measures reported on are found with the respective data tables throughout this report.