



# **ESG REPORT 2022**





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# **ABOUT THIS REPORT**

This is our first ESG Report, covering the Environmental, Social and Governance (ESG) activities of Vivion, head-quartered in Luxembourg, for the calendar year ending 31 December 2021. This report is intended to help investors and other stakeholders form a view about our ESG credentials. It covers all activities of the company.

GRI 102-1 / 102-3 / 102-5 / 102-45 / 102-50 / 102-51 / 102-52

# **Reporting Guidelines**

Vivion publishes this annual ESG Report referencing Global Reporting Initiative (GRI) standard and aiming to comply with EPRAs BPR guidelines.

GRI 102-54 / 102-55

#### **Data review**

This report has not been externally assured but was drafted in consultation with a third party advisor (Evora Global Limited) and has been checked for accuracy and completeness by the Board of Managers.

GRI 102-56

# Materiality assessment

In 2022, Vivion conducted an internal materiality assessment to identify and select the most significant social, environmental and governance issues. Further information can be found in the chapter titled 'Materiality' in this document.

GRI 102-46 / 103-1

#### SUSTAINABLE DEVELOPMENT GOALS UNITED NATIONS (SDG'S)

The following SDG's are currently most relevant to our Corporate Responsibility approach:

















# Participation in sustainability initiatives

The SDG framework brings together society, governments and business to drive positive change. As a responsible company, Vivion is determined to play an active role, on its own scale, contributing materially to the above SDGs via our Sustainability Strategy. To affirm this, Vivion look towards signatory status of the United Nations Global Compact in future years.

GRI 102-12

#### Contact

We welcome feedback, which can be directed to: **esg@vivion.eu** 

GRI 102-53



# **NOTES FROM THE CEO**



Sascha Hettrich CEO Vivion Investments S.à r.l.

Sustainability is not only a matter of these days, but it was also an important part of human culture for thousands of years. First it was the guarantee for mankind to survive, being in balance with nature and the environment, and second ensuring the right use of essential resources, which are, of course, not unlimited.

For us sustainability is a key priority moving forward to a sustainable future business. This is our first published ESG report.

Corporate sustainability for us means that the three pillars of sustainability are looked at very carefully: Act environmentally and socially responsible together with good corporate governance – People, Planet, Profit<sup>1</sup>.

Action shall not only be reflected in business planning but shall be implemented within processes and procedures of every day's doing.

Corporate Sustainability is a driving element and will ensure the future of the firm by adding value to our corporation, the industry and the community. For us, this aim is a global and all-purpose target and requires a long-lasting behavior to reach long-term objectives<sup>2</sup>.

Social responsibility means for us a supportive management to all our employees, but also to our stakeholders and shareholders, treating employees and business partners fairly and being a good neighbor and good community member.

This report shall show our understanding of the topic and what we are demanding to contribute to a healthy global environment. We believe, that this will furthermore foster our corporate successin the long run.

### Sascha Hettrich FRICS

CFO

VIVION Investments S.à.r.l.

<sup>&</sup>lt;sup>1</sup> Peter Fisk 2010.

<sup>&</sup>lt;sup>2</sup>Andrew Beattie, 6/2021 and Gordon Scott, Katrina Munichiello, Schreiber 2004; Chasek 2006 (Allmende-Thinking); Vogt 2009; Hans Carl von Carlowitz 1713; Sylvicultura Oeconomica.



# **ABOUT VIVION**

GRI 102-53 / 102-4 / 102-8

Our Group is headed by Vivion Investments S.à.r.l. (the "Company" or "Vivion" and together with its subsidiaries referred to as the "Group"), a private limited liability company (société à re-sponsabilité limitée, "S.à r.l."), organised under the laws of the Grand Duchy of Luxembourg, registered with the Luxembourg Register of Commerce and Companies (R.C.S. Luxembourg) under number B228676 and with registered office at 155 rue Cents, L-1319 Luxembourg, Grand Duchy of Luxembourg.

Vivion is a commercial real estate company, focusing on the ownership, management and improvement of properties in Germany and the United Kingdom. Vivion's portfolio comprises a quality office real estate portfolio in Germany which benefits from the strong expertise, reputation and network of its affiliated asset management platform and a well-diversified predominantly 3-4 star hotel portfolio in the United Kingdom let to experienced and internationally known hotel operators. Vivion's German Portfolio consists of predominantly office

properties located in top German cities with significant commercial activity, let to a variety of creditworthy tenants including government entities and "blue chip" companies, while its UK Portfolio consists of predominantly mid-market branded hotels mainly located in the UK's largest cities.

The length of the leases as well as the tenant profile and diversity reflect the stability of the Company's rental income stream and provides high predictability of the future cash flows. As at 31 December 2021, the WAULT of the Company's portfolio was 12 years, which the Group considers to be above industry norm. In addition, the vast majority of the leases are indexed for inflation, providing a protection against future risk of loss of purchasing power. The Groups UK portfolio benefits from long term leases with strong tenants, which is further supported by corporate in-place rent guarantees provided by substantially all our hotel tenants. The Property Occupancy Rate for our portfolio stands at 96%.

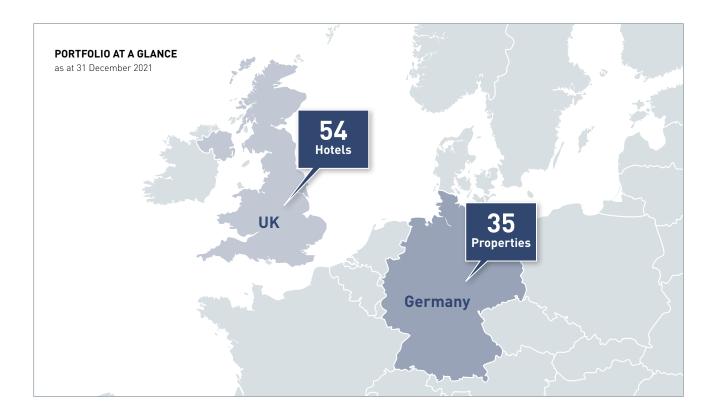
As at 31 December 2021 <sup>3</sup>	Total	UK	Germany
Annualised In-place rent (in EUR millions)	185.1	126.5	58.6
WAULT (in years)	11.8	13.8	7.5
Property Occupancy Rate in %	96	100	91
Number of properties	89	54	35

<sup>&</sup>lt;sup>3</sup> Excluding assets held for sale and two properties held in other EU jurisdictions.









We believe we maintain prudent and conservative management of our debt and equity capital structure. This is reflected in a Net LTV of 35.3% and comfortable liquidity position of EUR 803 million as at 31 December 2021. As of 31 December 2021, we had an Unencumbered Assets Ratio of 61.0% which we consider to be relatively high. Our debt financing is provided by a diversified group of both local and international debt providers from multiple countries. Moreover, we have established business relationships with other leading international and do-

mestic banks which we believe provide us with access to debt financing on attractive terms. The vast majority of interest rates for our loans and for the Existing Notes are either fixed or hedged, limiting our exposure to future increases in interest rates.

The equity portion of our capital structure benefits from international finance and institutional investors that have invested into our German Portfolio held by our fully consolidated subsidiary Golden.

#### Financial position highlights

	31 December 2021	31 December 2020	
	In EUR millions unless stated otherwise		
Total Assets	5,316	4,652	
Investment property 4	3,668	3,350	
Cash and cash equivalents	803	258	
Net Debt <sup>5</sup>	1,591	1,805	
Net LTV	35.3%	40.1%	
Secured LTV	-2.1%	12.0%	
Unencumbered assets	3,204	1,924	
Unencumbered assets ratio	61.0%	51.5%	
EPRA NTA	1,975	1,735	

<sup>&</sup>lt;sup>4</sup> Including EUR 80.4 million of advance payments for pipeline acquisitions (2020: EUR 145.8 million) and excluding assets held for sale

<sup>&</sup>lt;sup>5</sup> Net LTV calculated as Net debt / (Total assets (less cash and cash equivalents)). Net LTV as at 31 December 2020 restated for comparative purposes.



### Key financials

	For the period 1 January 2021 to 31 December 2021	For the period 1 January 2020 to 31 December 2020		
	In EUR thousands unless stated otherwise			
Revenues	199,627	187,172		
Adjusted EBITDA	165,092	141,59		
FF0	81,313	74,420		

Our experienced senior leadership team, comprising our Board of Managers, Advisory Board and the wider senior management team has, on average, almost two decades of relevant experience, including in public and private real estate companies and international investment firms.

Furthermore, we benefit from an exclusive relationship with a large, vertically integrated asset management platform. This asset management platform has extensive experience in acquiring and managing real estate across Europe, allowing us to benefit from their resources and experience. This combination gives us access to, and the ability to execute on, attractive investment opportunities efficiently and to manage and grow those investments successfully





# **MATERIALITY ANALYSIS**

GRI 102-47 / 103-1 / 102-4

This Report demonstrates the foundation and forward-looking perspective of our activities in the field of sustainability. The Report provides reference to the strategic structure on which our operations are focused, as well as the basis for subsequent ESG Reports to be published by Vivion.

We conducted a new materiality assessment begin 2022 in order to determine the topics that best reflect our ESG impact, as well as the matters that influence the decisions of our stakeholders. This Report marks the further enhancement of reporting on ESG and we are committed to continuously build on this initial report in the future and view the information presented as a starting point for disclosure.

As a result of our Materiality Assessment, 7 Key Material Topics were determined to be as most material to our stakeholders, as well as critical to effectively developing our ESG strategy. In addition, supplementary topics were determined to be of relevance to us as a company and were included as additional subjects for reporting. The breakdown can be found in the table on the next page.

This Report includes detailed information on each of the 14 Material Topics, which were found to be most impor-

tant to our stakeholders, as well as to us as a company. The materiality process included information gathering and analysis from several key sources:

#### (1) Research and Benchmarking

Thorough research was conducted regarding the key matters addressed within our sector, which influence and shape our ESG decisions on a daily basis. In addition, Sustainability Reporting Standards were reviewed and mapped, as well as relevant legislation.

#### (2) Stakeholder Engagement

Comprehensive discussions were held with our key internal stakeholders, from various professional backgrounds and positions, as well as with our external stakeholders, with diverse perspectives on our ESG impacts and activities.

#### (3) Analysis and Prioritization

The key matters that arose from the research and discussions conducted were fully analyzed and prioritized by us in order to provide the most relevant and precise outlook on our practices, impacts and efforts.





# **Material topics**

Key Material Topics	ESG Topic	
Net Zero Carbon	Facility	
Efficient building & certification	Environmental Environmental	
Health and Wellness	C . I	
Transparency and dialogue with Stakeholders	Social	
Compliance, Anti-Bribery & Corruption		
Disclosure	Corporate & Sustainability Governance	
Ethical Business Operations	1	

Additional Topics detailed in the Report	ESG Topic
Waste management	Environmental
Skills, competence & training	
Community engagement	Social
Data Protection & Information Systems	
Corporate Governance	
Investment Management Governance	Corporate Governance & Economic
Diversity & inclusion board composition	

Our approach to each material topic will be periodically evaluated in order to ensure proper awareness and action planning in the short, medium and long term.





# **ESG STRATEGY**

Vivion's sustainability strategy incorporates the ESG aspects of our operations. As such, our sustainability strategy sets out material ESG issues that matter the most to the Group and its key stakeholders. The objective of our strategy is to affirm our commitment to achieving long-term sustainable outcomes through our real estate assets, across our supply chain and in the communities we operate.

Over 2022, we will be strengthening the formal structure that sits behind our ESG strategy. Our approach to developing this ESG strategy can be summarized in four steps:

# ■ Material financial and sustainability/impact-related ESG risks and opportunities. ■ Corporate, product and asset strategy. Best practice and peer analysis. ■ Stakeholder interviews and workshops. **UNDERSTANDING OUR DRIVERS** ■ Risk identification, assessment and management. ■ Strategic ESG vision, product positioning, policy, objectives, targets/metrics. ■ Governance and research approach. **DESIGNING OUR STRATEGY** ■ ESG delivery framework to enable integration into all stages of investment process, e.g. deal sourcing, investment decision, ownership, sale. ■ Roles, responsibilities and training approach. ■ Responsible procurement/supply chain. **DELIVERING OUR STRATEGY** ■ Data capture, assurance, analysis and software. ■ Reporting strategy, i.e. product marketing/prospectus, annual and investor reports, EPRA **DISCLOSURE**



To help future-proof investments in line with ESG megatrends, Vivion is in the process of developing an ESG strategy that is:



#### **INTEGRATED**

To address and monitor issues across the investment lifecycle, from agreeing investment strategies to asset disposal.



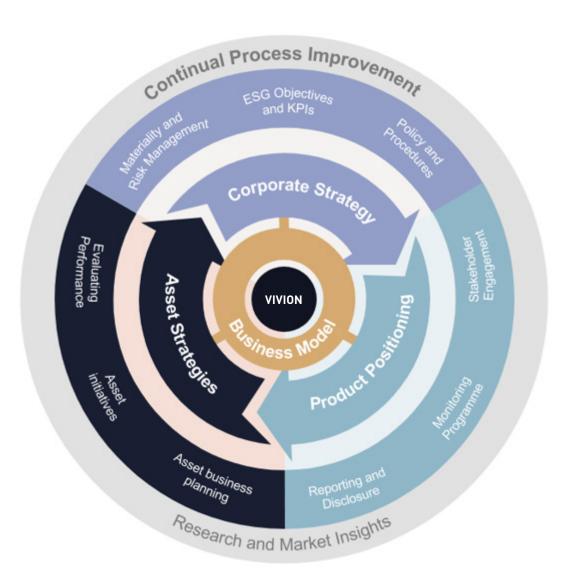
#### **DYNAMIC**

Adaptive and agile to keep ahead of ever-changing stakeholder expectations and ensure resilience across a portfolio.



#### **FINANCIALLY ALIGNED**

Enabling our asset managers to factor the cost of ESG mitigation measures into valuations and forecast environmental performance as they do financial performance.





# TACKLING CLIMATE CHANGE AND ENVIRONMENTAL CHALLENGES

We are championing a green recovery on the road to becoming a net zero carbon emissions business.

# Our climate strategy

Climate change is the most material environmental issue for our stakeholders and business. Our ambition is to become operationally net zero carbon by 2030 – this includes the energy that we have direct control over. We aim to be materially net zero carbon by 2040 – this includes our supply chain.

Our climate change strategy aims to reduce our endto-end emissions, improve the resilience of our assets and support a low carbon economy by:

- investing in energy-efficient and climate-resilient assets, including the elimination of gas supplies and providing on-site renewable sources
- reducing our energy needs and decarbonising the energy we buy and use, including through the purchase of renewable electricity
- working with suppliers to design buildings that minimise energy and materials use, as well as

- encouraging them to reduce their own greenhouse gas emissions
- developing low carbon buildings that enable our occupiers to reduce their carbon footprints
- engaging our colleagues to help them reduce their personal carbon footprints
- collaborating with others to accelerate the transition to a low carbon economy.

#### Road to net zero

We're reinventing the way we run our business to get to net zero. We are switching to renewable electricity and we are decarbonising our buildings.

#### Decarbonising our buildings

Currently our net zero carbon commitment applies to operational carbon emissions of buildings over which we have direct control. We are including all Scope 1 and Scope 2 greenhouse gas (GHG) emissions from our portfolio, wherever we have operational control and a direct ability to impact energy use and associated emissions.



# SCOPE 1 (DIRECT GHG EMISSIONS)

These are emissions associated with our direct consumption of: fossil fuels, specifically natural gas, diesel and refrigerants used for running heating.

# SCOPE 2 (INDIRECT GHG EMISSIONS)

These are created by other facilities during the generation of electricity which is then purchased and used by sites under Vivion's operational control. In our LfL portfolio, this electricity is generally used for things such as heating, ventilation and air conditioning (HVAC), lighting, and lifts.

# SCOPE 3 (INDIRECT GHG EMISSIONS)

Scope 3 emissions are all indirect emissions (not included in Scope 2) that occur in the value chain of Vivion's activities.

performance.



Our plan to become operationally net zero carbon focusses on four key elements:

- Continuing to maximise energy efficiency, for instance by developing an in-house 'Environmental Management System (EMS)';
- Develop embodied carbon reduction targets for new developments and refurbishments;
- Supplying our assets with 100% renewable energy; and
- Developing on the long term an appropriate carbon offsetting strategy for emissions that cannot be eliminated

Beginning in 2022, we started using a net zero carbon pathway tool (integrated with Carbon Risk Real Estate Monitor) to provide us with carbon reduction pathways for properties we have exposure to, based on a specific property type aligned with a 1.5°c scenario (in line with the Paris Climate Accord). This clearly shows us which assets are likely be at risk in the near future. This has been of great benefit as the information also allows for better understanding why certain assets are having higher intensity rates, whether additional capex is needed or whether this is due to, for example, tenant behaviour, or maybe even data gathering issues. These models are being revisited on an annual basis to track stranding risk against the latest data and improvement with the monitoring tool.

Opportunities for improvements are being fed into asset level ESG action plans. We move towards the procurement of the services of a cloud-based platform to enable better data management and also the ability to

track ESG actions on a shared system.

### Driving supplier climate action

A significant proportion of our end-to-end carbon emissions come from our supply chain. We're partnering with suppliers to curb their emissions and ours.

#### Pioneering climate contracts

We aim to work with suppliers that hold a commitment for measurable carbon saving. We are now looking towards placing clauses in our contracts to stipulate this and will report on our progress in future reports.

#### Setting high standards

All our suppliers must meet our requirements on climate and environmental management among other standards. We track compliance through supplier assessments. We encourage suppliers to report climate-related data to enhance transparency and accountability through frameworks such as CDP and PRI.

#### **Performance**

Our long term goal is to report our supply chain emissions and the latest contract stipulations will allow us to work towards this goal.

### Helping tenants cut carbon

More and more, our assets are helping our occupants cut their energy, fuel use and emissions. This is being enabled by our investments into carbon-cutting solutions – from solar photovoltaic to EV charging points.





Energy & Climate objectives	Progress & updates
Target operational Zero Net Carbon by 2030 (Scope 1 & 2) and material (Scope 3) emissions by 2040.	<ul> <li>We have continued the annual monitoring and measurement of all energy consumption within our LfL. Our intension is to increase the scope over our entire managed portfolio and implement solutions to improve data quality.</li> <li>Together with a third party technical consultant (Evora) we started on designing a net zero pathway modelling for assets, to start with our LfL portfolio.</li> <li>We have and will further enhance our due diligence process to understand the net zero carbon risk of any assets under consideration for acquisition. Vivion aims to acquire assets where we have the confidence that they can be decarbonized in time.</li> </ul>
100% of electricity is sourced from renewable energy	We continue to procure 100% of electricity in our LfL from renewable energy sources and obtain 'Ökostrom Certificates' (Renewable Energy Certificates) to guarantee its origin.
In 2021 we have started a pilot for solar PV rollout on viable roof space for 3 assets within our LfL portfolio.	This solar PV pilot has been rolled out for various assets (6% of the total sqm) and we are exploring further Solar PV implementation in 2022 for all other viable assets within our LfL portfolio.
Optimizing CHP systems	In 2021, together with our energy consultant who owns the Combined Heat and Power (CHP) systems in our assets, we have conducted an assessment on the efficiency of the CHP systems.
	We are awaiting the outcome of this assessment and will pro-actively follow up on opportunities to optimize the CHP efficiency and reduce costs.
	As the CHP systems are not owned by us but by our energy consultant, this would also mean that any further investments to improve efficiency in CHP system should be on their account. Ultimately our tenants will benefit from lower energy consumption by optimising efficiency of CHP systems.





# MITIGATING AND ADAPTING TO CLIMATE RISK

Vivion identifies 'climate change' as a risk to our business, not to mention the planet as a whole. By making the problem of climate change a key driver in long term strategic decision making, we will do our part to address this issue, creating long-term value opportunities in the process.

# Climate risk management

Our Board of Managers takes overall accountability for the management of identified ESG risks, like climate change, and the implementation of Vivion's sustainability strategy. The Board of Managers is supported from Vivion's senior management team, Risk Committee and ESG Committee. They are equipped with the capabilities and credentials to oversee governance and sustainability related affairs. Our Board of Managers are responsible for developing and facilitating the climate risk management framework, advising the business on climate risk management, and consolidating climate risk reporting to Stakeholders.

The asset & operational management team is accountable for asset specific risks, including risks related to climate, and is expected to actively manage and report on these risks, implement risk management initiatives, and use appropriate processes, procedures and controls to maintain compliance.

Our intentions going forward:

- Ensuring climate change remains an agenda item at every board meeting. In this regard, we will establish in 2022 an ESG committee that assists the Board of Managers with managing ESG related topics.
- Further integration of climate resilience and the management of climate-related risks and opportunities into project development plans.
- Standardising our approach to integrating climate-related risk and opportunity into our existing processes as part of our strategic asset planning process for all properties.
- Conduct scenario analysis on our investment portfolio to determine the financial impact of climate change to our business. In doing so, we hope to facilitate more informed financial decisions by investors, lenders, and other key stakeholders, and provide them with a greater understanding of how we view the commercial implications of climate change and what we are doing in response.
- Further use of the net zero pathway tool for future investment decisions for both new acquisitions and capex projects.
- Continually improving how we disclose and manage our risks in future reports.





# Understanding our transition risks

The below table sets out the long-term and short-term transitional risks we face as a result of climate change:

Transition risk	Timeline	Mitigation / Opportunity
Policy Climate policy actions typically fall into two categories: (i) those that attempt to constrain actions that contribute to the adverse effects of climate change or, (ii) those that seek to promote adaptation to climate change. Policy change around climate could potentially lead to an increase in operating costs through higher compliance costs, although it will depend on the nature and timing of the change. Carbon pricing policies may increase costs for organisations with significant carbon emissions, while other natural resources legislation (such as water and biodiversity) may become more stringent as scarcity increases.	Medium to long term	Our target to be material net zero carbon by 2040 is our primary climate change mitigation strategy and puts us ahead of the commitments made by the UK and German Government in relation to the Paris Agreement (i.e. 2050). Taking proactive steps to reduce our emissions means we will significantly reduce the risk or magnitude of penalties from incoming future legislation and other policy requirements.
Legal The failure to mitigate the impact of climate change and/or adapt to climate change, or insufficient disclosure on material financial risk could see increased litigation against companies and government for damages caused by climate change impacts.	Medium to long term	Our revenue will be drawn from low-carbon, high-performance assets, and we continue to explore how we can lower emissions through better design, the inclusion of energy efficient appliances and access to renewable energy. As such, litigation is likely to be a lower risk for us than other companies which are more energy and resource intensive.
Market Investors and markets are increasingly redirecting capital away from products and services that contribute negatively to climate change, impacting stock and asset values.	Short to long term	We look to future-proof our assets through improved energy and waste performance and our investment in renewable energy (on and off-site) to reduce adverse impact on climate change.
Reputation  An organisation's action or inaction in transitioning to a lower carbon economy poses a potential source of reputational risk, as stakeholders and communities continue to expect more from big businesses. A key reputational risk for Vivion would be failing to achieve net zero carbon. A second risk is that the assets we buy, hold and then sell don't perform well into the future. Reputational risk has a wider-ranging impact to our business: attracting high quality partners may become more difficult, governments and communities may resist working with us, and it will be harder to attract and retain top talent.	Short to long term	Demonstrating our commitment to a low carbon world and taking leadership in reducing our emissions addresses concerns from our stakeholders on Vivion's ability to effectively manage both its impact as well as its climate-related risks. Our sustainability credentials and reputation also continue to help us attract stakeholders who consider ESG in their decision-making.



### Understanding physical risks

Extreme weather is on the rise. This year saw a summer heatwave, floods and several significant storms across Europe. Due to the nature and value of our activities, physical climate risks are significant – both in relation to the developments under construction and the operation of the assets we own.

We aim to future proof our portfolio by monitoring and mitigating risks from extreme weather events like heat-

waves, storms and heavy rainfall. This year, we considered our vulnerability to heat, flooding and lightning strikes as part of our TCFD scenario planning.

We share details on potential threats to our assets to keep relevant parts of the business informed via appropriate communications. Alert warnings enable our property management teams to protect vital equipment, prepare for potential outages and support tenants.

Physical Risk	Timeline	Mitigation / Adaption
Extreme temperatures  Hotter days will increase demand for air conditioning and ventilation. This will lead to higher operating costs (energy consumption and maintenance costs). Higher minimum temperatures, particularly in summer months, will mean the use of fresh air for cooling overnight will not work as well. Adversely, cold weather extremes will increase demand on heating supplies, leading to higher operating costs (energy consumption and maintenance costs).	Short to long term	Ongoing mitigation strategies within our investment portfolio include implementing energy efficiency initiatives (such as installing energy efficient lighting, equipment and HVAC) to assist in reducing energy loads, as well as retrofitting existing assets to improve the building thermal envelope, whenever capital expenditure is justified. Additionally, there is an opportunity for us to work with our tenants to establish optimal conditions during extreme temperature events.
Extreme rainfall Heavy rainfall intensity is projected to increase.	Short to long term	Our building management teams proactively check and maintain building envelopes to improve resilience to extreme rain and hailstorms, and, where appropriate, implement effective stormwater management strategies.
Rising sea levels The projected range of sea-level rise by 2030 is around 0.07 to 0.19 metres above the 1986–2005 level. This could lead to restrictions on development approvals for projects on land one metre or less above sea level; increased costs and delays to construction; flooding and damage to property; increased costs from need to invest in flood prevention; business interruption to tenants; and, reduced land value.	Medium to long term	Mitigation strategies include reviewing the location of critical building infrastructure and investing in flood prevention infrastructure where appropriate. For those sites considered for acquisition, flood risk is a key component within our investment decision-making.





# Supporting a circular economy

We support the transition to a circular economy to reduce waste and preserve valuable natural resources. We're targeting zero waste to landfill, encouraging tenants to reuse and recycle, and cutting down on plastics.

#### Eliminating waste to landfill

Our internal waste management policy promotes a culture of continuous improvement as we work towards zero waste to landfill. Our sites produced over 3,000 tonnes of waste this year. We recovered or recycled 52% of this waste –and we're continually looking for ways to recycle more; for example, food composting.

#### Encouraging tenants to reuse and recycle

Within selected assets we offer segregated collection of general waste, including co-mingled, organic, fluorescent tubes and e-waste collection. We provide ongoing tenant education about correct waste and recycling disposal, including updated signage and waste education sessions.

In our UK portfolio, the operators of our hotels have several policies in place with respect to waste management. Among others, policies which include the following:

- Waste glass and bottles recycling
- Cardboard collected for recycling
- Where practical wastepaper used for scrap and note taking, otherwise is shredded for recycling.
- Waste cooking oil recycling
- The hotel's stationery and marketing materials uses products that are Chlorine free and from sustainably managed sources

In additional to the above, our hotel operators have recycling facilities on site which are available for guests to make use of.

#### Getting drastic on plastic

We acknowledge that plastic pollution poses a significant threat to the environment and we're committed to reducing plastic waste in all parts of our operations. We work towards baselining our plastics footprint.

Waste objective	Progress & updates
Continuous reduction in waste generation and improvement in recycling rates.	<ul> <li>Continuation of periodical monitoring and measurement of all waste streams across managed assets.</li> <li>Explore further collaboration and opportunities with tenants on how reduce waste disposal.</li> </ul>



# Managing environmental impacts

We aim to lead by example in the way we manage environmental risks and minimise our impacts. We can make the biggest difference by tackling climate change and supporting a circular economy. But we also pay close attention to our impacts on air pollution, biodiversity and water use.

Our ESG policy and ISO-14001-aligned environmental management system (EMS) guide our approach to risks and impacts, support continual improvements and help us comply with relevant regulations.

We include environmental and sustainability considerations in our plans for our corporate office. We also encourage colleagues to help us manage environmental impacts by changing their behaviour. This could be cutting use of single-use plastics, recycling more or collaborating virtually to avoid unnecessary business travel – a trend that has increased as a result of COVID-19.

#### Managing environmental risk

Our ESG Committee is being established to oversee our approach to environmental risk management. It will be chaired by our ESG Representative and made up of senior leaders from across the business. The Committee will report regularly to our Board.



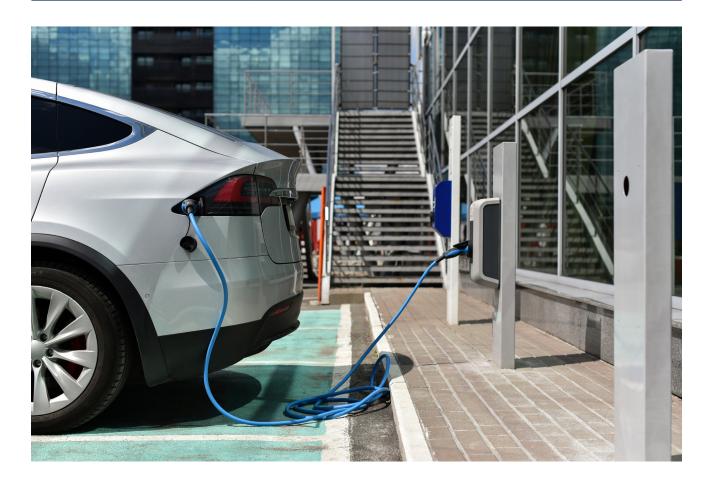
Environmental management objectives	Progress & updates
Green building certification	We expressed our intention to explore obtaining green certifications as LEED/BREEAM or DGNB within the near future.
Monitor mandatory certifications	We obtain mandatory energy certification label for all our German and UK assets and monitor against any minimum standard regulations (e.g. MEES).
Development of an in-house 'Environmental Management System (EMS)'	In 2021, we have started together with a third party consultant our plans to implement an in-house EMS. This EMS will follow the ISO 14001 standard – Plan, Do, Check, Act cycle – to promote continual improvement within a formal framework. This EMS will be embedded throughout our organization and will become the core base for our ESG commitments.



#### Tackling air pollution

Maintaining good air quality is vital to the health of our colleagues, tenants and communities. We install electric vehicle chargers at all appropriate sites to help reduce pollutants from combustion engines. We are also looking at targeting a high risk urban site to conduct air quality monitoring in the near future.

Waste objective	Progress & updates
Increase of electric car charging stations	In 2021 we have assessed the possibilities in our LfL portfolio how to increase the amount of electric car charging stations. In our LfL portfolio 38 assets have EV charging facilities. 160 chargers are in application. The requests for obtaining the proper licenses for the installation of these car charging stations has been set out.



### **Nurturing biodiversity**

Supporting a healthy natural environment is essential to prevent biodiversity loss, a significant global issue with strong links to climate change, water use and pandemics. We will utilise our EMS to help us manage

biodiversity impacts and we monitor wildlife-related incidents or risks at our sites. Where possible, at our sites with landscaping, we incorporate native species and pollinating plants.



# BEING TRANSPARENT AND ACCOUNTABLE

Investors, tenants and regulatory bodies are increasingly looking to the environmental, social and governance (ESG) credentials of businesses to inform their choices. We're meeting the challenge through our increased focus on transparent reporting and strong governance. Listening to all of our stakeholders keeps us focused on what matters and accountable for our actions.

# **Engaging with stakeholders**

GRI 102-40 / 102-42 / 102-43

We place the highest importance on stakeholder engagement and transparency. We maintain relationships with various stakeholder groups throughout Germany and the UK and are in constant dialogue with them in a variety of ways. By communicating with them, we learn to understand their opinions and requirements and are able to examine our options and develop specific measures as part of our risk manage-

ment. We take the concerns of our stakeholders seriously and factoring them into our work and processes. We understand that every decision can have a different effect on various stakeholder groups. Wherever possible, we strive to pursue our corporate targets with consideration for the various requirements and interest of all stakeholders involved. How relevant a group of stakeholders is, depends directly on our business activities.

Generally, we divide our stakeholders into five groups: shareholders & investors, employees, tenants, business partners and local communities. As a company, we assume a proactive approach for identifying and addressing the needs and expectations of our stakeholders in order to foster long-term and impactful relationships focusing on advocacy, inspiration and business excellence.







#### **SHAREHOLDERS & INVESTORS**

- Provide truthful, complete and timely information that enables balanced investment decisions
- Pursue differentiation, identifying business opportunities which add value to our operations
- Ensure compliance with the highest standards of quality in the course of business.
- Organize road shows, conference calls and investor dialogue
- Provide direct and constitent communication with our Board of Managers



#### **BUSINESS PARTNERS**

- Promote a relationship based on mutual trust, transparency and value
- Through our Code of Conduct setting standards for our business partners and together being an example in adhering to integrity, professionalism and ethics
- Ensure direct communication with our Board of Managers and Senior Management
- Arrange frequent update meetings



#### **TENANTS**

- Ensure the health and safety of our tenants throughout our real estate portfolio
- Focus on tenant-orientated property management
- On site presence for tenants and properties
- Assuming a proactive approach to handling tenant concerns
- Closely monitoring tenant feedback and suggestions and implementing feedback where possible



### **LOCAL COMMUNITIES**

- Focus on relationships of trust and transparency with local communities
- Engaging local communities through increasing tenant presence, employment of local contractors and businesses
- Active involvement and contact with local authorities



#### **EMPLOYEES**

- Foster the integration of future employees, providing them with the necessary tools to develop their abilities in a motivating environment
- Ensure equal opportunities and diversity, promoting the integration of people and groups with different capacities and backgrounds within Vivion and Business Partners
- Promote a stable and safe work environment for our employees and the employees of our business partners



#### **Tenants**

For us, tenant satisfaction is important and considered to be the backbone of our operation. It is the source of generating yields and a key indicator of our success. Tenant occupancy has been identified as a topic that is rated as operating risk and can directly affect the company's returns and profitability.

#### How we engage with tenants, and the result

We value and welcome the open and dynamic channel of communication with each of our tenants. Transparent conduct is of the essence in terms of providing care and adequately attending to every tenants' needs.

We always welcome suggestions, initiatives, requests and feedback from tenants, as we believe it is an important factor for our operation. All feedback is being addressed and considered by our local real estate management team. Regular checks are performed in order to supervise the correct implementation of decisions derived from the suggestions and received from tenants.

In order to best manage needs and dialogue with tenants, we engage dedicated and trusted real estate management business partners, which have direct contact with tenants to ensure that any potential issue is handled in a swift and efficient manner. Our engaged real estate property and asset managers and tenants meet regularly in order to ensure optimal service.

In addition, we are currently setting standards for our German business partner to conduct satisfaction surveys among our tenants in Germany. Eventually we want to have survey's scope for all of our locations. The results from the satisfaction surveys are used to develop improvement plans for constant improvement in tenant satisfaction regarding real estate management services provided by our business partners.

In the UK, we do not operate our hotel assets, but it is still important for us to guide and monitor our properties regarding those topics. We have engaged business partners for real estate management in the UK and Germany in order to exercise greater management and control over customer satisfaction and needs. Those real estate managers collect customer feedback through outsourcing services which collect information from guests upon their departure from our hotels. In addition, our hotel operators place great importance on reviews placed on third party websites, such

as Booking.com or Hotels.com, all of which are being reviewed by the local Business Partner periodically. Monthly reports are prepared in order to review and react to all written and telephone feedback received.

In 2021, Western Europe was still confronted with the COVID -19 pandemic which effects both landlord as tenant. On a day to day basis, Vivion monitors the COVID-19 situation and the impact thereof on our tenants. Our local teams are in a continuous dialogue with our tenants to access the situation and if needed working closely together with the tenants operators to ensure, the currently challenging operating environment is navigated in the most effective way possible for all parties involved.

#### Tenant health and safety

Vivion has as goal that all properties can be used without any risk to health and safety. In order to achieve this, we aim for tailor-made property management, regular safety inspections, investments in maintenance and compliance with all (local) requirements.

We offer our uncompromised attentive care to tenants' needs and open communication channels for improvement. A significant element in our tenant satisfaction methodology is ensuring their safety and well-being. We are maintaining and constantly updating all health and safety policies, in order to be in line with all the best practices in the field. Our aim is to be prepared at all times and prevent any potential inconvenience which may occur.

Comprehensive compliance with all regulations constitutes as a mandatory threshold requirement standard in both the UK and in Germany. Our asset management teams are responsible for providing guidance and supervision in the efforts of complying with safety regulations. In addition, we require our local real estate management partners to answer to our own strict standards on those matters. In order to maintain a high-level of care in health and safety topics, we have implemented numerous health and safety policies throughout all of our assets, such as the documented periodic fire safety audits, which includes checks of proper fire alarms and extinguishing gear. Additionally, we are conducting rebuilding valuations to ensure the building's compliance with up-dated procedures, as part of our policy. These policies were updated and modified within the past three years, to accommodate the industries best practice and maintain a safe environment to all stake-



holders in general, and for our tenants in particular. Other major subjects on our agenda include: accident reporting policies, electrical safety, gas safety, first aid policy and food safety. In matters of health and safety, all incidents and events, whether minor of major, are reported and dealt with as a top priority. In order to provide this dedicated care, we have assigned several competent persons to each of our assets, which are responsible and properly trained for the supervision, monitoring and reporting of said incidents, as well as the conclusions deducted from it. Vivion's management is informed of any occurrence, minor to major, and is taking active part in constructing an action plan when needed.

Our locations are being checked on a regular basis in consultation with experts in the field of practice. Thorough property checks are per-formed consistently for locations which have a history of an incident occurring, in order to ensure non-recurrence.

No incidents of non-compliance concerning the health and safety impacts of products and services were reported during 2021.

#### **Communities**

Our assets are at the heart of the communities we operate in, and often help bring them together. Building and preserving relationships with all the communities we serve isn't just important to our commercial success. It's also key to the way we operate as a responsible and sustainable business. Communities rely on us to:

- Improve the fabric of their immediate surroundings
- protect the environment, help tackle issues like climate change and do business ethically and responsibly.

#### How we engage with communities, and the result

We believe ongoing cooperation and dialogue with tenants and communities is a tool for achieving mutual beneficial development and building strong partnerships. We believe that the investment in community-building engagement is to generate impact that combines positive social impact with concurrent regional economic growth. Input from local authorities and other stakeholders is key in determining appropriate investment measures. Dialogue also ensures higher levels of transparency, allowing Vivion to actively manage and address concerns about possible negative

outcomes. Throughout asset takeover and repositioning we actively seek to engage local authorities. We believe strong communities are crucial to maintain robust, tenant relationships.

We are focused on connecting and developing the neighbourhoods and communities in which our assets are located. At Vivion, we believe that employing local companies and contractors to service our assets is a leading principle which proved to be of added value for the local economy. Other community development efforts include creating a sense of family among building tenants, as well as for tenants among neighbouring buildings.

By working to improve the areas surrounding company assets, we aim to be a force for good within the community. We are committed to fulfilling our ESG to actively engage in improving the surroundings and environment in our neighbourhoods of operation.

Methods in which we plan to actualize this goal include:

- Providing local based property management to tenants
- Social engagement with tenants
- With other landlords examine and start initiatives to improve the connected neighbourhood and surrounding businesses
- Active involvement and contact with local authorities

#### Investors

We have been specialising in real estate investment since 2018, together with institutional investors.

Our investors want us to:

- deliver a return on their investment through dividends or capital growth
- perform well against our outlook and long-term strategy.

#### How we engage with investors, and the result

We communicate regularly with investors through our website, publication of our financial statements and associated reporting. We manage relationships with institutional investors through an investor relations programme. It includes one-to-one conversations, roadshows conferences and industry events. The CEO and other board members also spend time with investors.



The Board receives regular reports on how we're engaging with institutional investors. The Board also discusses any investor issues with management. As ESG-awareness has increased significantly across our investor base, we are proud to be able to provide our investors with enhanced insights and reliable data on the ESG performance of our company.

#### Real estate industry

Sustainability isn't just about our own operations. We work with leaders across our industry to develop and scale innovative solutions for a more sustainable world. We believe this is an important part of our stewardship efforts.

The industry wants us to:

- encourage investment and innovation
- collaborate on share challenges

# How we engage with the wider industry, and the result

All Vivion directors are proactively encouraged to engage in networking, attending events and sitting on interview panels with industry schemes.





#### **Data Protection**

As a real estate investment firm, we place the highest priority to the proper handling of our stakeholders' privacy and the handling of sensitive information. Privacy and data issues are a vital element of responsibility to our tenants, investors and other relevant stakeholders.

We have embedded data protection and data security into our corporate strategy, thus expressing our ultimate commitment to the privacy of all our stakeholders.

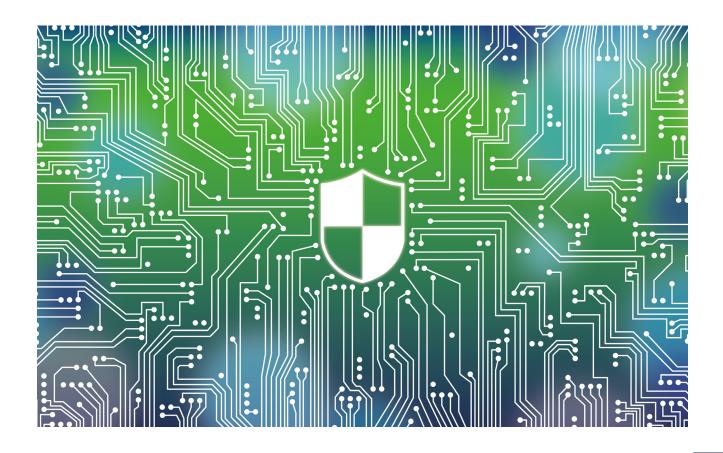
In light of a rapidly evolving technological world, many countries have adopted detailed regulations regarding privacy matters, and usage of personal data. We operate in complete compliance with all relevant data privacy laws applicable to the Group, including the European Union's newly adopted General Data Protection Regulation ("GDPR") data privacy laws and the UK Data Protection Act of 2018. Together with our local real estate management platforms, we are fully compliant with the GDPR and regulations and have implemented relevant policies and procedures regarding the handling, sharing and disposal of private information, which company management, Vivion personnel and our Business Partners are to be fully adherent to. These policies include:

- Data Privacy Policy
- Breach Notification Policy
- Record Retention Policy
- Confidential Data Disposal Policy

In addition, full adherence to all data protection and privacy regulations and policies is included within our Code of Conduct, upon which all company representatives and business partners are required to sign on an annual basis.

We are aware that there is a constant need for new and enhanced data protection systems and assessments in order to provide the maximum assurance to all stakeholders. Our management is mindful of the potential changes in emerging regulation, including examining the regulation upon entering new markets and making adjustments to corporate information systems, as required.

In the year 2021, we had not identified or received any substantiated complaints concerning breaches of privacy or the handling of sensitive data, from outside parties and substantiated by the organization, such as our business partners or from regulatory bodies.





### **Corporate Governance**

The Board of Managers has established the Advisory Board and internal committees to enhance a standard of internal supervision and providing advice to the Board of Managers.

The Board of Managers has full discretion to establish committees that it deems useful, appoint and dismiss their members and to determine their organisation, responsibilities, powers and procedures in internal regulations adopted by way of a resolution. For good Corporate Governance, the Board of Managers is advised regarding the establishment of committees and their specific task by the Advisory Board.

Our Board of Managers and Advisory Board hold corporate governance in the highest regard. Our corporate governance practices create a culture of enduring and uncompromising integrity. Each of the Advisory Board members possesses extensive industry experience and knowledge.

The Company has Rules of Procedures for the Board of Managers, which delineate the power, limitation and role of the Board of Managers. The Rules of Procedures define the appointment and composition of the Board of Managers, its areas of activity and authority, the manner of convening the Board, and management of its meetings and the activities of its internal committees. This policy is designed to promote our "checks and balances" approach to decision making and corporate governance.

In 2021, we have initiated and implemented a process to further strengthen our Corporate Governance including, among others:

- We expressed our intention to add a new and non-executive and independent Manager to the Board of Managers.
- Enhanced and maintained a compliance sched-
- Introduced an ecoDa self-evaluation questionnaire. To be completed by the Board of Managers on an annual basis.
- Enhanced the functioning of the company's committee structure

Vivion adopted the following Committees to support the Board of Managers:

#### **Audit Committee**

The Board of Managers has established an Audit Committee. The Board of Managers decides on the composition, tasks and term of the Audit Committee as well as the appointment and dismissal of its members. The Audit Committee consists of members with a proven background in finance. The responsibilities of the Audit Committee include ensuring the integrity of the financial statements, including reporting to the Board of Managers on its activities, guiding the Board of Managers regarding financial reporting towards third parties, the adequacy of internal systems controlling the financial reporting processes and monitoring the accounting processes including the review of accounting policies. The Audit Committee recommends to the Board of Managers a nomination for the statutory auditor and provides guidance to the Board of Managers on the auditing of the annual financial statements of the Company and, in particular, shall monitor the independence of the approved independent auditor, the additional services rendered by such auditor, the issuing of the audit mandate to the auditor, the determination of auditing focal points and the fee agreement with the auditor. The Audit Committee would encourage continuous improvement in the areas described in order to strengthen the Company's corporate governance.

#### Risk Committee

The Board of Managers established a Risk Committee for assisting and providing expert advice to the Board of Managers in fulfilling its oversight responsibilities, relating to the different types of risks, recommend a risk management structure including the organizational supporting structure and its process as well as assess and monitor effectiveness of the risk management. The Risk Committee provides advice on actions of compliance, in particular by reviewing the Group's procedures for detecting risk, the effectiveness of the Group's risk management and internal control system and by assessing the scope and effectiveness of the systems established by the management to identify, assess and monitor risks. The Board of Managers decides on the composition, tasks and term of the Risk Committee and the appointment and dismissal of its members.

#### **Investment Committee**

The Board of Managers established an Investment Committee and an investment protocol has been creat-



ed. Our investment protocol is based on a system of internal checks and balances. Prior to entering into new transactions, internal approval by the investment committee is required, as per our internal investment policy. The stages required for a new investment opportunity to be approved, include multiple stages of screening, due diligence and assessments. Reviews are made by the acquisition team and Investment Committee, prior to being approved by the Board of Managers. The Investment Committee would also address investment management structure and relevant policies to support the governance of the Company.

In addition to the Committees, the Board of Managers has appointed an ESG representative and a Compliance Officer.

#### **ESG Committee**

The Board of Managers will establish in 2022 an ESG committee that is responsible for creating a unanimous

approach towards ESG matters. Firstly, the ESG committee assist in increasing awareness for all related corporate governance and sustainability matters. Additionally, the ESG committee facilitates the implementation, overseeing and monitoring of all related ESG policies and initiatives within Vivion. Altogether, the ESG committee will provide a good foundation for discussing proposals for a better conduct and ESG integration.

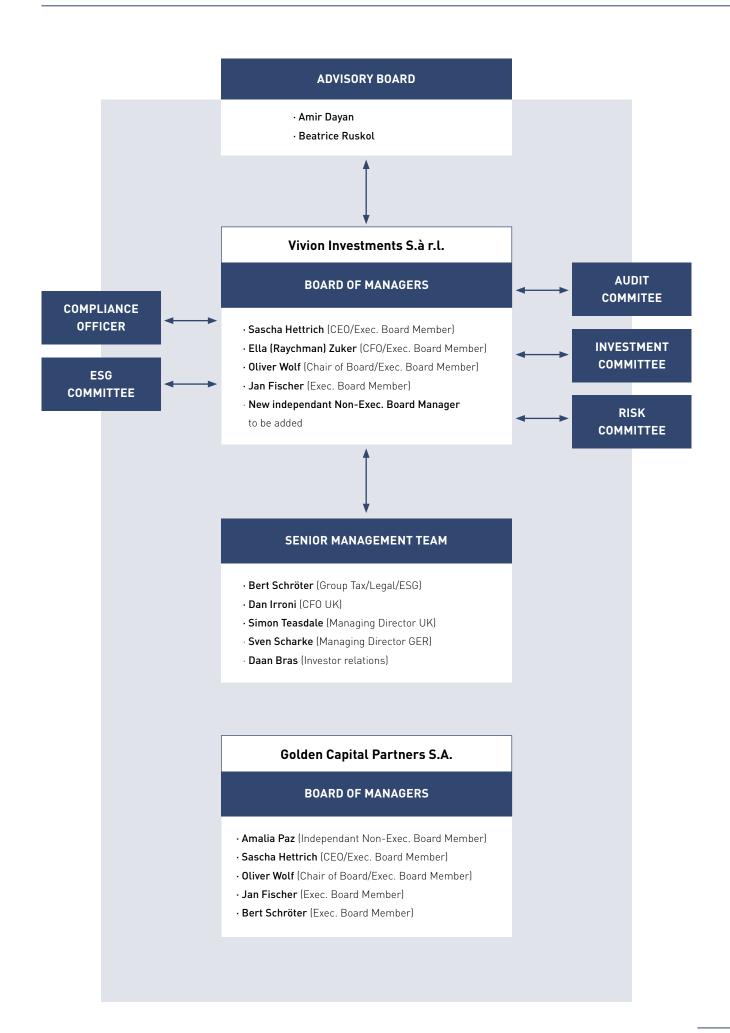
We believe that by appointing an ESG committee, all relevant ESG matters will further enhance. The ESG committee will create a more efficient path for implementing and monitoring sustainable decisions taken within the Group.

#### Compliance Officer

The Compliance Officer oversees all compliance related matters of the Group and advises the Board of Managers on applicable compliance laws and regulations and internal policies and procedures.









# Company process for conflicts of interest issues

Any conflicts of interest with personal matters or other business activities, including those of relatives or other related parties, should be avoided. Should such conflicts nevertheless occur, they must be resolved in accordance with the law and with Vivion's policies. Conflicts must be dealt with openly and transparently. All employees, including the Board of Managers, is required to sign the Code of Conduct in which the issue of conflict of interest is included. Our approach to Conflicts of interest is also included in our Code of Conduct for Business Partners.

The Board of Managers must act in the best interest of the Company and in accordance with the Company's Articles of Association. This includes the obligation for each member to act as a reasonably prudent businessperson. Each member of the Board of Managers must manage the Company's business in good faith, with reasonable care and at all times in the best interest of Vivion and must refrain from doing anything that does not fall within the scope of the Company's corporate objectives.

Any member of the Board of Managers who has any kind of interest that is contrary to that of Vivion in a transaction submitted to the Board of Managers for approval is obliged to inform the Company and the Risk Committee of this conflict and will refrain from taking part in the decision making and refrain from voting and record his statement in the minutes of the meeting. The shareholders of Vivion will be informed before voting on such resolution. The Board of Managers will discuss the matter with the risk committee, the legal counsel and the Compliance Officer. If, because of the conflict of interest, the voting required based on the Articles of Association has not been achieved, the Board of Managers can decide to defer the decision to the general meeting of shareholders.

If a conflict of interest occurs with respect to any other Vivion personnel, it must be reported to the Board of Managers immediately. The Board of Managers will discuss the matter with our Risk Committee, the legal counsel and the Compliance Officer.

Without prior written approval by the Board of Managers, Vivion personnel is not permitted to render services as a supervisory board member, management board

member or trustee in another company other than Vivion or a company related to Vivion if there is a conflict of interest. This rule does not apply to corresponding functions in a not-for-profit, religious, public, political or social facility or to further education situations and advisory boards as tenants or apartment owners the activities of which do not conflict with Vivion's interests and which do not require any excessive amount of time.

# Compliance

Our approach to compliance is that of full commitment to all applicable laws and regulations. We established several compliance mechanisms within our Group, in order to ensure total adherence to our core values in all practises and to be in line with applicable legislation and directives. Such directives include the European Union Anti-Money Laundering Directives and General Data Protection Regulation (GDPR) among others, (see sections 'Anti-Bribery & Corruption' and Data Protection & Information Systems).

Thus, we believe that a wholesome approach to compliance provides a strategic advantage and long-term perspective to our development.

Our compliance program is the corporate framework through which all company representatives conduct business and carry out their responsibilities. The Board of Managers and the Senior Management teams are highly involved in regulatory and compliance matters, in a variety of areas, including: tax, health and safety, bribery & corruption, money laundering, and more. We take our compliance responsibilities extremely seriously and ensure that full adherence with the relevant regulations are taking place at any given moment.

As we are a group with an international presence, monitoring of the regulatory requirements in all countries of operation is key in order to ensure ethical and fair business approach to all operations, as well as operations which are compliant with health and safety standards for tenants.

Thorough due diligence procedures are a central element to our compliance efforts. To protect the interest and reputation of Vivion and our stakeholders, our transaction parties and business partners are to be assessed by our compliance department.

In the year 2021, we have not faced any cases of



non-compliance with any laws and regulations applicable to our Company or the Group.

### Compliance Officer

We appointed a compliance officer, which will oversee all compliance-related matters in a systematic manner. Presently, all relevant regulations in regard to compliance are constantly reviewed and monitored by the Board of Managers, our legal counsel and our Compliance Officer, in order to ensure full legal compliance with all relevant regulations.

In addition to our in-house legal counsel, we frequently engage with external legal advisors in each country of operation, which have the relevant legal and compliance expertise in the local market where Vivion operates

### **Anti-bribery & corruption**

We are committed to upholding all Anti-Bribery & Corruption laws and regulations and mitigating reputational risk in all countries in which we operate. We take these matters extremely seriously and are committed to preventing and monitoring such cases by all means necessary.

A thorough and detailed Compliance Program and

compliance mechanisms were developed, addressing Anti-Bribery & Corruption, Anti-Money Laundering and Political Contributions matters within Vivion. Our Compliance Program clearly explicate all forms of inappropriate payments, including those to government officials and other entities, such as charitable donations and sponsorships intended to disguise bribery or money laundering. We uphold a zero-tolerance approach to all of the aforementioned regulations. Our Compliance Program applies to all Vivion personnel and sets certain standards through our Code of Conduct for our Company business partners and service providers acting for, or on behalf of Vivion.

In addition, we explicitly mention our strict no-tolerance policy regarding Anti-Bribery & Corruption within our Code of Conduct.

Compliance Mechanisms are adopted in each of our markets of operation, in order to properly address the differing local regulations in regard to Anti-Bribery & Corruption. We ensure full compliance with all relevant Anti-Bribery & Corruption regulations and perform consistent regulatory reviews in order to properly monitor regulatory updates.

In the year 2021, no corruption allegations, suspicions, nor reports were received or have taken place.





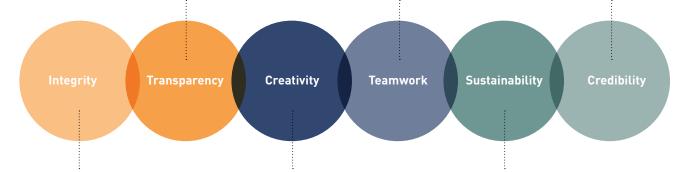
### **Code of Conduct**

Our core values, as set and determined by our Board of Managers and which are included in our Code of Conduct, are based on the following key principles:

Creating and maintaining a transparent relationship with our stakeholders and with our business partners and tenants is the foundation for building long-term partnerships.

Creating synergy by adjoining the real estate expertise of all VIVION representatives, as well as teaming up with our business partners and tenants for mutual success.

Delivering truthful, complete and timely information and promises to all stakeholders.



We believe that committing to integrity in all our decisions and interactions allow the successful fruition of all endeavours.

Creatively expanding our portfolio with modern concepts and expertise, as well as consistently providing forward-looking solutions to all of our stakeholders for each challenge encountered.

Delivering sustainable solutions throughout the entire asset management and property management process.





These six key values are the basis of our ESG efforts, as discussed throughout this Report.

Integrity, credibility, and ethical business operations are the cornerstones of our operations. With 'Integrity' as the leading core value of our Company, all business transactions, daily business activities and strategic decisions are executed with corporate integrity in mind, as it is the element that contributes to our lasting success.

We are committed to the highest standards of ethical conduct and integrity in all of our business activities. Our Company's approach and views on ethics are defined in our Code of Conduct, which applies to all our subsidiaries, affiliated companies, managing Managers, members of the supervisory board and senior executives, thereof.

In order to ensure adherence to the highest standards of integrity, professionalism and ethics, our business partners are required to abide by an additional Code of Conduct, which delineates our no-tolerance policy for any misconduct on behalf of Vivion's business partners. Our whistle-blower mechanism implemented in our Business Partner Code of Conduct will allow us to receive additional inputs that can be relevant to our integrity and risks emerging in the Company and

throughout our activities. In this matter, any potential concern can be swiftly and easily handled as soon as possible

All Vivion personnel is required to internalize and sign upon the Code of Conduct; this process will be reviewed annually.

In addition to our Code of Conduct, one of our processes to assess the risk level and also address risk management requirements, is our Know-Your-Client (KYC) checks, as well as financial checks for potential tenants and service providers. This procedure is performed in order to protect our integrity and lower the risk of contracting with any entity that is or was involved in a bribery, corruption, money laundering or other illegal activities thereof.

All current Vivion management level employees and future employees are expected to perform their duties and responsibilities with the highest degree of integrity, as well as performing their work with honesty, responsibility and transparency. All Vivion employees are expected to refrain from any illegal activity. Vivion assumes a strict approach for prevention of any conflict of interest.



# **CLOSING STATEMENTS**

#### **GRI Content Index**

Our sustainability reporting has been prepared with reference to the guidelines developed by the Global Reporting Initiative (GRI). This content index demonstrates our alignment with the General Disclosures and Topic-Specific Standards for the Priority 1 material topics that were identified following our most recent materiality review in 2022.

GRI 102-54 / 102-55

# **EPRA** performance measures

Vivion reports the Company's sustainability indicators based on EPRA's (European Public Real Estate Association) latest recommendations: Best Practice Recommendations on Sustainability Reporting, third version September 2017.

# OVERARCHING RECOMMENDATIONS Organisational boundary

Vivion limits its report to properties controlled by Vivion (operational control) in accordance with the principles of the Greenhouse Gas Protocol. This includes all real estate assets owned or managed by Vivion.

Operational control has been chosen since it provides Vivion with the best conditions for demonstrating statistics and data that Vivion can directly influence.

#### Coverage

Vivion works actively to access relevant data for the properties that Vivion owns and manages. Having access to data is important to Vivion as the information creates conditions for efficient and sound technical management of the buildings. The proportion of properties included in each indicator is mentioned in connection with respective key indicators.

Measurement data is affected by changes in the portfolio – i.e., recently purchased, sold and project properties – which complicate access to relevant data. Vivion constantly strives to access all relevant data as comprehensively as possible. We commit to reporting on progress annually.

#### Estimations of data

Where data for Vivion-obtained utility consumption is missing, we have used the following es-timation methodology to fill gaps following periods ofknown consumption:

- direct comparison using data from the corresponding period of the previous year;
- 2. the daily average of available data (requiring a minimum of 180 days) from the current calendar year is used; or,
- 3. the daily average of available data (requiring a minimum of 180 days) from the previous calendar year is used; or,
- 4. where insufficient previous data was available, we have excluded the property from reporting.

Where newly acquired assets have entered the portfolio and accurate meter readings are not able to be obtained straight away, we have calculated back dated estimates of an initial meter reading based on pro rata estimates of actual meter reading data after this time. We have only back dated these estimates to the date that the asset became Vivion's responsibility if less than a year prior to the first available meter reading, or the beginning of the current reporting year if the acquisition date is more than a year before the first available actual meter reading.

#### Third party verification/assurance

Third party consultancy has been sought, but this report has not been assured. We look towards this in future years.

#### Normalisation

Vivion calculates energy and water intensity key ratios by dividing by the buildings' floor area. This is the most widely accepted method in Europe for a self-storage facility to compare energy utilization and resource consumption.

#### Segmental analysis (by property type, geography)

We report on the Vivion portfolio based in Germany which consists of several building types – offices, hotels and other.

Our UK assets are not under control of Vivion, but that of our UK hotel operators. This year we have not includ-



ed the UK data in our report. We look towards disclosing this in future reports.

#### Disclosure on own offices

Vivion has offices located in Luxembourg, London and Berlin.Both function under a serviced office agreement andas such the energy is not within our direct control. Assuch, we have chosen to not report on this informationthis annum, but we will explore disclosing this information in future reports.

#### Narrative on performance

Where appropriate, we have provided a narrative on our performance alongside the relevant performance measure in this document.

#### Reporting on landlord and tenant consumption

All utilities consumption relates to consumption that we purchase and/or control as the landlord. Tenant obtained data (i.e. from bills which the tenant receives directly) is excluded. We look towards reporting on consumption at our tenant demises in future reporting. Reporting period

Reporting for each year accounted for in the EPRA table refers to the calendar year, i.e., January 1, 2021 to December 31, 2021.



#### **Environmental Sustainability Performance Measures**

The EPRA sBPR compliance table below provides an overview of the EPRA sustainability performance measures that Vivion is able to report on, and an explanation of where data cannot be reported.

#### EPRA sustainability best practice recommendations compliance table Environmental Sustainability Performance Measures

EPRA Sustainability	y Performance Measures	Portfolio	Corporate office	Where measure is reported Pages
Elec-Abs	Total electricity consumption	✓	Х	38 - 42
Elec-LfL	Like-for-like total electricity consumption	✓	Х	38 - 42
DH&C-Abs	Total district heating & cooling consumption	✓	Х	38 - 42
DH&C-LfL	Like-for-like total district heating & cooling consumption	<b>√</b>	х	38 - 42
Fuels-Abs	Total fuel consumption	✓	Х	38 - 42
Fuels-LfL	Like-for-like total fuel consumption	✓	Х	38 - 42
Energy-Int	Building energy intensity	✓	Х	38 - 42
GHG-Dir-Abs	Total direct greenhouse gas (GHG) emissions	✓	Х	38 - 42
GHG-Indir-Abs	Total indirect greenhouse gas (GHG) emissions	✓	Х	38 - 42
GHG-Int	Greenhouse gas (GHG) intensity from building energy consumption	<b>√</b>	х	38 - 42
Water-Abs	Total water consumption	х	Х	X
Water-LfL	Like-for-like total water consumption	х	Х	Х
Water-Int	Building water intensity	Х	Х	Х
Waste-Abs	Total weight of waste by disposal route	✓	Х	42
Waste-LfL	Like-for-like total weight of waste by disposal route	~	х	42
Cert-Tot	Type and number of sustainably certified assets	✓	×	43

**Key:** Fully reported ✓ Partially reported -- Not reported **X** Not applicable **N/A** 

#### Methodology

We have reported on all EPRA Sustainability Performance Measures, using the EPRA Best Practices Recommendations on Sustainability Reporting 3rd Version, the main requirements of the GHG Protocol Corporate Standard (revised edition) and emissions factors from country-specific, best practice conversion factors for the appropriate year.

Greenhouse gas emissions are reported as metric tons CO2 equivalent (tCO2e) and greenhouse gas intensity is reported as kilograms of CO2 equivalent (kgCO2e).

Like-for-like measures excludes all assets not held for the full two-year period from January 1, 2020, to December 31, 2021, any assets for which were undergoing major refurbishment or redevelopment and those assets held for sale.

Any further exclusions from absolute and like-for-like measures have been reported in the data notes accompanying the EPRA tables.

Applicable properties refer to the number of properties within our organizational boundaries for this indicator.



# Social and Governance Sustainability Performance Measures

We are able to report on all Social and Governance Performance Measures. The EPRA sBPR compliance table below provides an overview of the EPRA sustainability performance measures that Vivion is able to report on, and an explanation of where data cannot be reported.

### EPRA sustainability best practice recommendations compliance table Environmental Sustainability Performance Measures

EPRA Sustainability	y Performance Measures	Portfolio	Vivion Corporate	Where measure is reported
SOCIAL PERFORMA	NCE MEASURES		ou.portus	Pages
Diversity-Emp	Employee gender diversity	N/A	✓	44
Diversity-Pay	Gender pay ratio	N/A	N/A	×
Diversity-Pay	Equal Pay Analysis	N/A	N/A	×
Emp-Training	Employee training and development	N/A	N/A	×
Emp-Dev	Employee performance appraisals	N/A	N/A	×
Emp-Turnover	New hires and turnover	N/A	N/A	×
H&S-Emp	Employee Health and Safety	N/A	N/A	×
H&S-Asset	Asset Health and Safety assessments	✓	N/A	44
H&S-Comp	Asset Health and Safety compliance	✓	N/A	44
Comty-Eng	Community engagement, impact assessments and development programs	✓	N/A	44
GOVERNANCE PER	FORMANCE MEASURES			
Gov-Board	Composition of the highest governance body	N/A	<b>✓</b>	45
Gov-Selec	Process for nominating and selecting the highest governance body	N/A	Х	х
Gov-Col	Process for managing conflicts of interest	N/A	✓	46

**Key:** Fully reported ✓ Partially reported -- Not reported **X** Not applicable **N/A** 



### **Environmental Performance Measures**

Absolute and Like-for-like Energy, Building Energy Intensity, GHG Emissions and GHG Intensity for owned assets (offices)

GRI 302-1 / 305-1 / 305-2

	and like-for-lik			20	21			20	20			
Energy re	eported in MWh		Ab- solute Con- sump- tion	Cover- age of appli- cable proper- ties	Like- for-like con- sump- tion	Cover- age of appli- cable proper- ties	Ab- solute Con- sump- tion	Cover- age of appli- cable proper- ties	Like- for-like con- sump- tion	Cover- age of appli- cable proper- ties	Ab- solute Trend	Like- for- like trend
		VIVION obtained electricity	749	17 of 18	429	10 of 11	773	17 of 18	439	10 of 11	-3%	-2%
	Elec-Abs Elec-LfL	Proportion of electricity from renewable sources	100%	17 of 18	100%	10 of 11	100%	17 of 18	100%	10 of 11		
		% of electricity estimated	86%	3 of 18	11%	3 of 11	0%	17 of 18	0%	10 of 10		
		VIVION obtained fuels (natural gas)	4.511	17 of 17	1.869	10 of 10	4.602	17 of 17	1.959	10 of 10	-2%	-5%
Offices	Fuels-Abs Fuels-LfL	Proportion of fuels from renewable sources	0%	0 of 17	0%	0 of 10	0%	0 of 17	0%	0 of 10		
		% of fuels estimated	86%	12 of 17	66%	5 of 10	5%	3 of 17	13%	3 of 10		
	Energy	Total Energy Consumption from all offices	5.260	17 of 18	2.297	10 of 11	5.375	17 of 18	2.398	10 of 11	-2%	-4%
	Building energy intensity for offices (kWh/sqm/year - GIA)											
	Energy-Int	Building energy intensity for all VIVION-obtained energy	115,9	17 of 18	86,8	10 of 11	118,4	17 of 18	90,6	10 of 11	-2%	-4%
		VIVION obtained electricity	177	2 of 2	177	2 of 2	177	2 of 2	177	2 of 2	0%	0%
	Elec-Abs Elec-LfL	Proportion of electricity from renewable sources	100%	2 of 2	100%	2 of 2	100%	2 of 2	100%	2 of 2		
		% of electricity estimated	100%	2 of 2	100%	2 of 2	0%	0 of 2	0%	0 of 2		
		VIVION obtained fuels (natural gas)	741	2 of 2	741	2 of 2	741	2 of 2	741	2 of 2	0%	0%
Hotels	Fuels-Abs Fuels-LfL	Proportion of fuels from renewable sources	0%	0 of 3	0%	0 of 3	0%	0 of 2	0%	0 of 2		
		% of fuels estimated	100%	2 of 2	100%	2 of 2	0%	2 of 2	0%	2 of 2		
	Energy	Total Energy Consumption from all offices	918	2 of 2	918	2 of 2	918	2 of 2	918	2 of 2	0%	0%
	Building ene	rgy intensity for hotels	s (kWh/sqm	n/year - GIA	J							
	Energy-Int	Building energy intensity for all VIVION-obtained energy	131,7	2 of 2	131,7	2 of 2	131,7	2 of 2	131,7	2 of 2	0%	0%

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	and like-for-lik r investment po			20	21			20	20			
Energy re	ported in MWh		Ab- solute Con- sump- tion	Cover- age of appli- cable proper- ties	Like- for-like con- sump- tion	Cover- age of appli- cable proper- ties	Ab- solute Con- sump- tion	Cover- age of appli- cable proper- ties	Like- for-like con- sump- tion	Cover- age of appli- cable proper- ties	Ab- solute Trend	Like- for- like trend
		VIVION obtained electricity	150	7 of 7	116	5 of 5	150	7 of 7	116	5 of 5	0%	0%
	"Elec-Abs Elec-LfL"	Proportion of electricity from renewable sources	100%	7 of 7	100%	5 of 5	100%	7 of 7	100%	5 of 5		
		% of electricity estimated	77%	4 of 7	98%	4 of 5	0%	0 of 7	0%	0 of 5		
	VIVION obtained fuels (natural gas)	475	6 of 6	322	4 of 4	510	6 of 6	322	4 of 4	-7%	0%	
Other	"Fuels-Abs Tuels-LfL"	Proportion of fuels from renewable sources	0%	0 of 7	0%	0 of 4	0%	0 of 6	0%	0 of 4		
		% of fuels esti- mated	58%	5 of 7	74%	3 of 4	17%	1 of 6%	26%	1 of 4		
	Energy	Total Energy Con- sumption from all other assets	624	7 of 7	438	5 of 5	660	7 of 7	438	5 of 5	-5%	0%
	Building ene	rgy intensity for other	(kWh/sqm	/year - GIA)								
	Energy-Int	Building energy intensity for all VIVION-obtained energy	44,2	7 of 7	102,0	5 of 5	46,7	7 of 7	102,0	5 of 5	-5%	0%
Energy Total		Total Energy Consumption from all sources	6.802	26 of 27	3.654	17 of 18	6.954	26 of 27	3.754	17 of 18	-2%	-3%



	e GHG emissions f ent portfolio	or		20	21			20	20			
GHG rep	ported in tCO2e		Ab- solute Con- sump- tion	Cover- age of appli- cable proper- ties	Like- for-like con- sump- tion	Cover- age of appli- cable proper- ties	Ab- solute Con- sump- tion	Cover- age of appli- cable proper- ties	Like- for-like con- sump- tion	Cover- age of appli- cable proper- ties	Ab- solute Trend	Like- for- like trend
	CHC Dia Ala	Direct GHG Emissions (GHG Protocol Scope 1, gas)	826	17 of 17	342	10 of 10	847	17 of 17	360	10 of 10	-3%	-5,1%
	GHG-Dir-Abs GHG-Dir-LfL	Direct GHG Emissions (GHG Protocol Scope 1) after green procurement	826	17 of 17	342	10 of 10	847	17 of 17	360	10 of 10	-3%	-5,1%
	GHG-Indir-Abs	Indirect GHG emission (GHG Protocol Scope 2 Location-based) in tonnes	259	17 of 18	148	10 of 11	311	17 of 18	176	10 of 11	-17%	-15,9%
Offices	GHG-Indir-Abs GHG-Indir-LfL	Indirect GHG emission (GHG Protocol Scope 2 Market-based) in tonnes after green procurement	0	17 of 18	0	10 of 11	0	17 of 18	0	10 of 11	-	-
	GHG	GHG Scope 1 & 2 (Location based; before green procurement) in tonnes	1.085	17 of 18	490	10 of 11	1.158	17 of 18	537	10 of 11	-6%	-8,7%
		GHG Scope 1 & 2 (Market based; after green procu- rement) in tonnes	826	17 of 18	342	10 of 11	847	17 of 18	360	10 of 11	-3%	-5,1%
	Building GHG Int	ensity for offices (Kg	CO2e/sqm	/year - GIA)								
	GHG-Int	Building GHG Intensity (GHG Protocol Scopes 1 and 2)	18,2	17 of 18	12,9	10 of 11	18,7	17 of 18	13,6	10 of 11	-3%	-5,1%
	GHG-Dir-Abs	Direct GHG Emissions (GHG Protocol Scope 1, gas)	136	2 of 2	136	2 of 2	136	2 of 2	136	2 of 2	-1%	-0,6%
	GHG-Dir-LfL	Direct GHG Emissions (GHG Protocol Scope 1) after green procurement	136	2 of 2	136	2 of 2	136	2 of 2	136	2 of 2	-1%	-0,6%
		Indirect GHG emission (GHG Protocol Scope 2 Location-based) in tonnes	61	2 of 2	61	2 of 2	71	2 of 2	71	2 of 2	-14%	-13,9%
Hotels	GHG-Indir-Abs GHG-Indir-LfL	Indirect GHG emission (GHG Protocol Scope 2 Market-based) in tonnes after green procurement	0	2 of 2	0	2 of 2	0	2 of 2	0	2 of 2	-	-
_	GHG	GHG Scope 1 & 2 (Location based; before green procurement) in tonnes	197	2 of 2	197	2 of 2	208	2 of 2	208	2 of 2	-5%	-5,1%
		GHG Scope 1 & 2 (Market based; after green procu- rement) in tonnes	136	2 of 2	136	2 of 2	136	2 of 2	136	2 of 2	-1%	-0,6%
	Building GHG Int	ensity for hotels (Kg	CO2e/sqm/	year - GIA)								
	GHG-Int	Building GHG Intensity (GHG Protocol Scopes 1 and 2)	19,4	2 of 2	19,4	2 of 2	19,6	2 of 2	19,6	2 of 2	-1%	-0,6%



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	e GHG emissions for	or		20	21			20	20			
GHG rep	ported in tCO2e		Ab- solute Con- sump- tion	Cover- age of appli- cable proper- ties	Like- for-like con- sump- tion	Cover- age of appli- cable proper- ties	Ab- solute Con- sump- tion	Cover- age of appli- cable proper- ties	Like- for-like con- sump- tion	Cover- age of appli- cable proper- ties	Ab- solute Trend	Like- for- like trend
	GHG-Dir-Abs	Direct GHG Emissions (GHG Protocol Scope 1, gas)	87	6 of 6	59	4 of 4	94	6 of 6	59	4 of 4	-7%	-0,5%
	GHG-Dir-LfL	Direct GHG Emissions (GHG Protocol Scope 1) after green procurement	87	6 of 6	59	4 of 4	94	6 of 6	59	4 of 4	-7%	-0,5%
	GHG-Indir-Abs	Indirect GHG emission (GHG Protocol Scope 2 Location-based) in tonnes	52	7 of 7	40	5 of 5	60	7 of 7	47	5 of 5	-14%	-13,7%
Other	GHG-Indir-LfL	Indirect GHG emission (GHG Protocol Scope 2 Market-based) in tonnes after green procurement	0	7 of 7	0	5 of 5	0	7 of 7	0	5 of 5	-	-
	GHG	GHG Scope 1 & 2 (Location based; before green procurement) in tonnes	139	7 of 7	99	5 of 5	154	7 of 7	106	5 of 5	-10%	-6,3%
		GHG Scope 1 & 2 (Market based; after green procu- rement) in tonnes	87	7 of 7	59	5 of 5	94	7 of 7	59	5 of 5	-7%	-0,5%
	Building GHG Int	ensity for other (Kg C	02e/sqm/y	/ear - GIA)								
	GHG-Int	Building GHG Intensity (GHG Protocol Scopes 1 and 2)	6,1	7 of 7	13,7	5 of 5	6,6	7 of 7	13,8	5 of 5	-7%	-0,5%
		Direct GHG Emissions (GHG Protocol Scope 1, gas)	1.048	25 of 25	537	16 of 16	1.077	25 of 25	556	16 of 16	-3%	-3,5%
	GHG-Dir-Abs GHG-Dir-LfL	Direct GHG Emissions (GHG Protocol Scope 1) after green procure- ment	1.048	25 of 25	537	16 of 16	1.077	25 of 25	556	21 of 21	-3%	-3,5%
		Indirect GHG emission (GHG Protocol Scope 2 Location-based) in tonnes	372	26 of 27	250	17 of 18	442	26 of 27	294	17 of 18	-16%	-15,1%
Total	GHG-Indir-Abs GHG-Indir-LfL	Indirect GHG emission (GHG Protocol Scope 2 Market-based) in tonnes after green procure- ment	0	26 of 27	0	17 of 18	0	26 of 27	0	17 of 18	-	-
		GHG Scope 1 & 2 (Location based; before green procurement) in tonnes	1.420	26 of 27	786	17 of 18	1.519	26 of 27	850	17 of 18	-7%	-7,5%
	GHG	GHG Scope 1 & 2 (Market based; after green procurement) in tonnes	1.048	26 of 27	537	17 of 18	1.077	26 of 27	556	17 of 18	-3%	-3,5%



#### Data coverage notes for owned assets:

Part of the data set is estimated due to lack of data availability and /or quality.

#### Narrative on performance:

Total energy consumption has decreased by 3% on a like for like basis. Total greenhouse gas emission reductions have also been realised – at 7.5% on a like

for like basis. This is positive, particularly mindful that COVID-19 pandemic and associated lockdowns reduced energy consumption at sites across the portfolio in 2020 and easing of restrictions should actually have increased energy usage in 2021. With our heightened desire to improve data collection and quality, once our figures are all 'actual' we can truly reflect and provide appropriate narrative.

# Total weight of waste by disposal route and like-for-like total of weight of waste by disposal route for owned assets

GRI 306-1 / 306-2

•	otal weight	lisposal route and of waste by disposal		20	121			20	20		Ab-	Like- for-
Waste reporte	ed in tonnes		Ab- solute tonnes	Ab- solute Propor- tion	Like- for-like tonnes	Like- for-like Propor- tion	Ab- solute tonnes	Ab- solute Propor- tion	Like- for-like tonnes	Like- for-like Propor- tion	solute Trend	like trend
		Recycled	2.030	52%	1.281	52%	2.030	52%	1.281	52%	0%	0%
		Incineration (with and without energy recovery)	1.568	48%	1.568	48%	1.568	48%	1.568	48%	0%	0%
		Landfill (non hazardous)	0	0%	0	0%	0	0%	0	0%	0%	0%
Waste-Abs		Hazardous Waste Treatment Facility	6	0%	6	0%	6	0%	6	0%	0%	0%
Waste-LfL	Stores	Materials Recovery Facility - Unknown	0	0%	0	0%	0	0%	0	0%	0%	0%
		Total	3.604	100%	2.855	100%	3.604	100%	2.855	100%	0%	0%
		% of waste esti- mated	100%		100%		0%		0%			
		Coverage of applicable properties	40 of 40		40 of 40		40 of 40		40 of 40			

#### Data coverage notes for owned assets:

Data is currently estimated for 2021 based on 2020 figures.

#### Narrative on performance:

As a landlord, we cannot directly control or affect the waste disposal of our tenants, but we can have open discussion with our tenants and raising their aware-

ness to the subject. Subsequently, as a landlord we can positively contribute in waste disposal initiatives such as separating waste in a more environmental manner and recycling. 52% of all our waste streams is recycled; the remainder (excluding hazardous) is incinerated. We work towards increasing our recycling percentage year on year.



### Type and number of sustainably certified assets

Cert-Tot (Type a			2021		2020			
Type of Certification	Name of certification	Number of certified properties	Percentage of portfolio certified (by floor area)	Coverage of Applicable Properties	Number of certified properties	Percentage of portfolio certified (by floor area)	Coverage of Applicable Properties	
Mandatory Certifications	EU Energy Performance Certificate	40	100%	40 of 40	40	100%	40 of 40	

#### Data coverage notes for owned assets:

Mandatory certifications are EU energy performance certificates, which are not mandatory for all of Vivion's properties because they are only mandatory for buildings which are marketed or sold, or those that have been recently constructed.

Voluntary certifications include BREEAM (Building Research Establishment Environmental Method). Vivion recognises the benefits of green building certification and is currently considering the application of these certifications where they would add most value.



#### Social Performance Measures

#### Employee gender diversity

Employee Gende	er Diversity			20	21	2020		
Impact Area	EPRA Code	Units of Measure	Indicator	Female	Male	Female	Male	
			Advisory Board	50%	50%	33%	66%	
Diversity-Emp	Diversity-	% of male & female	Board of Managers	25%	75%	25%	75%	
	Emp	remate	Senior Management	0%	100%	0%	100%	

#### Narrative on performance:

At present, Vivion does not have any direct employees. All whom sit on the various boards or take an active role within Vivion are indirectly employed by service entities. We choose to include the diversity statistics of our governance bodies irrespective of their employment status. This status is at the end of the reporting period (e.g. 31st December 2021).

The Group's management team consists of the Board of Managers, the Advisory Board and the wider senior management team which are managing the subsidiaries of the Company.

Vivion believes that a diverse perspective is key to success.

Further information around the makeup of our management team can be found here: https://vivion.eu/about-us

#### Asset health and safety assessments and compliance

Asset health an	d safety assessm	ents and complian	nce		
Impact Area	EPRA Code	Units of Mea- sure		2021	2020
Asset health and safety assessments	H&S-Assets	% of assets	% of assets for which health and safety impacts are assessed or reviewed	100%	100%
Asset health and safety compliance	H&S-Comp	Total number	Number of incidents of non-compliance with regulations and/or voluntary standards	0	0

#### Narrative on performance:

Vivion is fully committed to providing safe facilities to our tenants and our staff. Health & safety criteria are regularly assessed by the Property Managers in our properties to ensure that applicable health & safety rules are respected.

The organisation has not identified any non-compliance with regulations and/or voluntary codes. We continue to comply fully with COVID-19 recommendations issued by local governments and health authorities.



#### Governance Performance Measures

#### Composition of the highest governance body

Composition of t	he highest gove	ernance body			
Impact Area	EPRA Code	Units of Measure	Indicator	2021	2020
			Number of executive Board members	4	4
Composition of the Board of Gov-Board Managers			Number of independent Board members	0	0
			Number of non-executive Board members	0	0
	Total numbers	Average tenure on the governance body (years)	3	2	
			Number of Board members with competencies relatingto environmental and social topics	4	4

#### Narrative on performance:

The Group's management team consists of the Board of Managers, the Advisory Board and the wider senior management team which are managing the subsidiaries of the Company.

The Board of Managers oversee all operations and review all internal decision making. The Company's Board of Managers has the highest regard for corporate governance. Further information around the makeup of our management team can be found here: https://VIVION.eu/about-us



# Process for managing conflicts of interest

Processes for managing conflicts of interest					
Impact Area	EPRA Code	Units of Measure	Indicator	2021	2020
Process for managing conflicts of interest	Gov-Col	Narrative descrip- tion	Composition of the Board of Managers	financial interest shall notify of the Board of Managers an discussions or vote of the Bo Board, and the decision shall of the voting Managers.  Where, due to a conflict of in nagers required to be preser reached, the Board may defemeeting of investors.  Managers must take approp flicts of interest.  Managers must use their be tial conflict of interest with the controlled by it.  If a Manager has a direct or ting interest of a financial nation within the authority of the other Managers prior to Manager who has a conflicting actions or decisions.  This procedure does not app	of the Board conflicting with ager having a direct or indirect the Board or any committee and shall not participate in any pard or any committee of the all be taken by simple majority atterests, the number of Mant for a valid quorum is not er the decision to the general ariate actions in case of constant for a valid any potential and company or any company indirect personal and confliction in a decision or transfithe Board, he must so notify a decision by the Board. Ang interest may not participate of the Board on such transfithe decisions of the Board of slength and concerning the

This indicator evaluates processes to ensure that conflicts of interest are avoided and managed in the highest governance body and whether conflicts of interest are disclosed to stakeholders.

# Narrative on performance:

No conflicts of interest were identified in either year.

DISCLAIMER This report contains forward-looking statements with associated risks and uncertainties. The actual business development and results of the Group may in future deviate significantly from the assumptions on which this report is based.

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