



*Every investment is
a new challenge...*

ESG RAPORT

DL INVEST GROUP
for year 2024

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Statement from the Supervisory Board

The year 2024 marked a defining stage in the evolution of DL Invest Group's sustainability framework. In a business environment shaped by regulatory transformation under the Corporate Sustainability Reporting Directive (CSRD), accelerating climate policy across the European Union, and growing expectations from financial institutions and tenants, sustainability has become an integral component of corporate governance and long-term strategy.

This report has been prepared in alignment with the European Sustainability Reporting Standards (ESRS) and reflects our continued transition from a compliance-oriented ESG approach toward a structured, measurable, and governance-integrated sustainability model. The document presents our environmental, social, and governance performance for 2024, outlines key risks and opportunities, and describes the strategic direction of our transformation.

During the reporting year, DL Invest Group strengthened the integration of ESG considerations into strategic planning, capital allocation decisions, and operational management. Particular attention was given to climate risk assessment, energy efficiency optimization, resource management, internal ESG data governance, and enhanced transparency. The preparation of this ESRS-aligned report represents a further step in formalizing sustainability oversight and ensuring regulatory readiness.

We remain convinced that resilience, transparency, and disciplined long-term management are fundamental to maintaining asset value, strengthening investor confidence, and ensuring sustainable growth in a rapidly evolving market environment.

Dominik Leszczyński
Chairman of the Supervisory Board



Raport ESG

ESG Integration within the Business Model of DL Invest Group

02

II. ESG Integration within the Business Model of DL Invest Group

DL Invest Group operates as a long-term developer and asset owner within the Polish commercial real estate market, with over 17 years of experience. The Company applies a fully integrated investment model encompassing land acquisition, design, construction, commercialization, and long-term operational management. Unlike short-term development models focused on asset disposal, DL Invest Group retains ownership of completed properties, ensuring continuous operational oversight and lifecycle value optimization. As of 31 December 2024, the Group managed 41 operational properties with a total portfolio value of

PLN 3.98 billion and an occupancy rate of 97%. This long-term ownership structure enables systematic integration of environmental, social, and governance considerations across the entire asset lifecycle, from design and construction to long-term tenant relations and modernization planning.

The Company's investment horizon, typically exceeding 17 years per asset, directly influences construction standards, technical durability requirements, and operational strategies. Buildings are designed with a focus on resilience, energy performance, and lifecycle cost optimization. Continuous modernization and proactive facility management ensure stable performance, minimize operational disruptions, and



support tenant business continuity.

Maintaining long-term relationships with tenants remains a strategic priority. The Company adopts a flexible approach to space configuration, technical adaptation, and evolving ESG requirements. High occupancy levels reflect the effectiveness of this model and confirm the stability of the portfolio in a changing macroeconomic and regulatory environment.

As a long-term owner and operator, DL Invest Group assumes responsibility for the environmental, social, and governance impacts associated with its investments. This responsibility extends beyond construction to include ongoing management of environmental footprint, community integration, and regulatory compliance. The Company's model aligns operational performance with long-term value creation and asset stewardship.

ESG as a Structural Element of Strategy

Environmental, social, and governance considerations are embedded within the strategic decision-making framework of DL Invest Group. ESG is not treated as a standalone initiative but as a structural component of risk management, capital allocation, and portfolio resilience planning.

The evolving European regulatory landscape, including CSRD implementation and the EU Taxonomy framework, has reinforced the importance of structured sustainability governance. At the same time, financial institutions increasingly incorporate ESG criteria into credit assessments and investment decisions, while tenants place greater emphasis on energy efficiency and environmental performance.

In response, the Company is progressively formalizing measurable sustainability targets, strengthening data management systems, and integrating ESG risks into strategic planning processes. This approach enhances access to financing, reduces transition and regulatory risks, and supports long-term competitiveness.

Climate Change and Environmental Responsibility

Climate change represents a material long-term risk for the real estate sector, influencing asset resilience, regulatory requirements, and operational performance. Both physical risks, such as extreme weather events, and transition risks, including regulatory tightening and energy market volatility, require structured management. DL Invest Group addresses these challenges through



systematic energy performance improvements, modernization of technical infrastructure, and gradual integration of renewable energy solutions. Building Management Systems are optimized to improve operational efficiency, and photovoltaic installations are progressively implemented where technically feasible. Resource management practices incorporate circular economy principles, including construction waste segregation, responsible material sourcing, and rainwater retention where appropriate.

Environmental education initiatives and responsible supply chain engagement further support the Company's sustainability objectives. Through these measures, DL Invest Group aims to reduce operational emissions, enhance energy efficiency, and strengthen long-term asset resilience.

Regulatory and Macroeconomic Context

The Company operates within a dynamic regulatory and macroeconomic environment shaped by European sustainability policy, national economic developments, and evolving labor market conditions. Implementation of CSRD and increasing climate-related disclosure requirements are reshaping reporting obligations and

capital market expectations.

Macroeconomic developments in 2023–2024, including moderated inflation, stabilization of interest rates, labor cost pressures, and energy transition policies, directly influence development costs, financing conditions, and tenant demand patterns. These external factors reinforce the importance of disciplined financial management, conservative capital structure, and structured ESG integration.

Transformation and Long-Term Outlook

DL Invest Group is undergoing a structural transformation toward a governance-integrated sustainability model aligned with ESRS requirements. ESG considerations are progressively embedded into management oversight, investment evaluation, and operational processes. Digitalization plays a central role in this transition by enabling centralized ESG data management, infrastructure monitoring, and automated reporting capabilities.

The Company's transformation reflects a shift from short-term performance orientation toward lifecycle-based value optimization. Sustainability is increasingly monitored through measurable indicators, supporting



informed decision-making and strengthening resilience. DL Invest Group perceives regulatory evolution not solely as a compliance obligation, but as an opportunity to enhance asset quality, improve operational efficiency, and reinforce long-term competitiveness. Through structured governance, disciplined risk management, and measurable sustainability integration, the Company continues to position itself for resilient and responsible growth.

ESRS 2 – General Disclosures

ESRS 2 GOV-1

Governance Structure and Sustainability Oversight

DL Invest Group operates under a two-tier governance structure composed of:

- Management Board
- Supervisory Board

This structure ensures a clear separation between executive management and independent oversight, supporting accountability and balanced decision-making. The Management Board holds responsibility for strategic direction, operational management, financial planning, and integration of ESG considerations into business decisions.

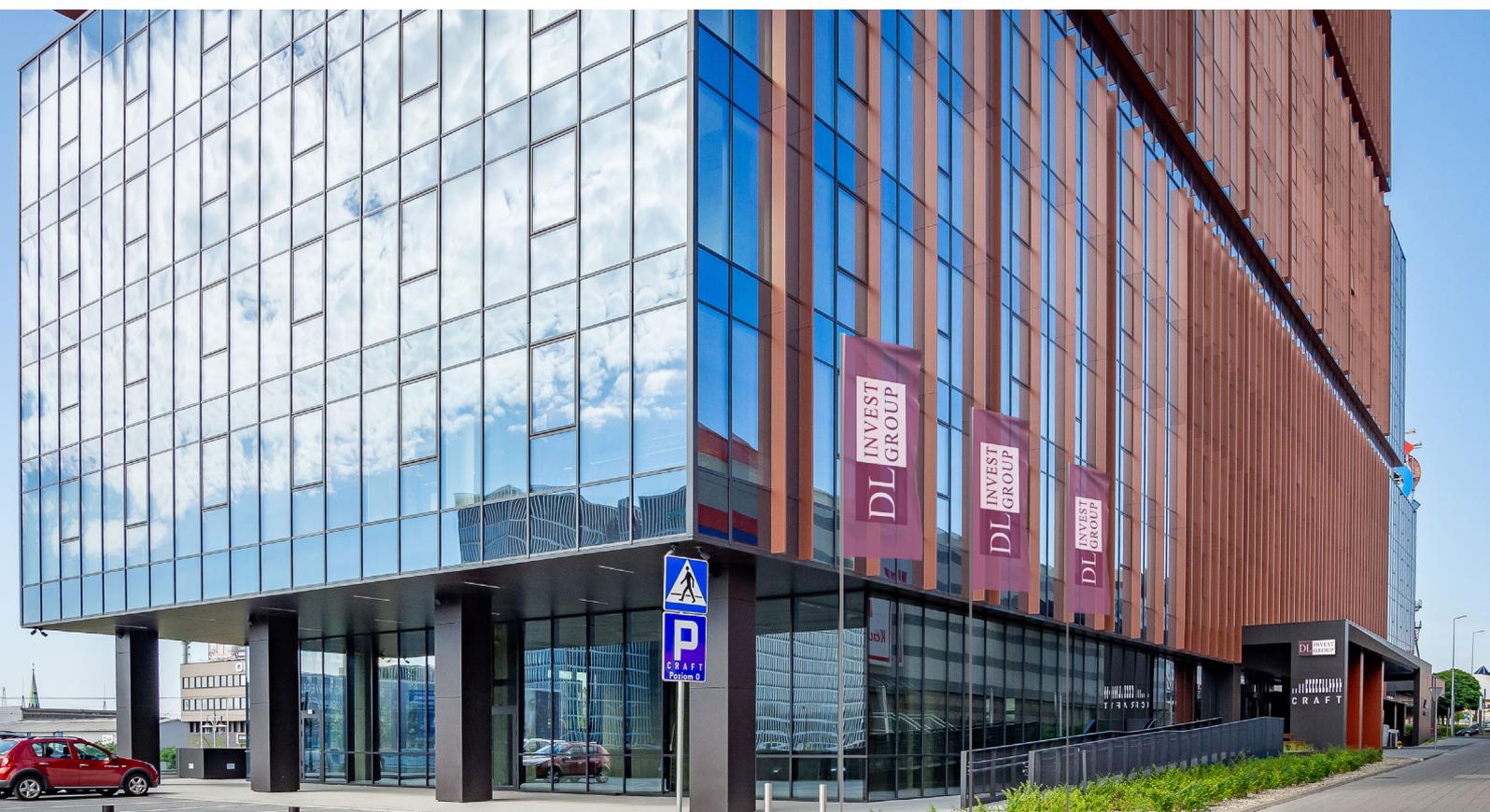
Sustainability factors are incorporated into strategic planning, investment evaluation, and enterprise risk management processes. In 2024, ESG oversight was further formalized through:

- integration of ESG factors into strategic and financial planning,
- inclusion of sustainability risks within the enterprise risk management framework,
- strengthening cross-departmental ESG data coordination,
- preparation for CSRD-aligned reporting and enhanced internal controls.

The Supervisory Board performs independent oversight of management activities and monitors compliance with legal, financial, and governance standards. Sustainability risks, regulatory developments, and climate transition matters are reviewed periodically at board level as part of long-term strategic supervision.

Operational responsibility for ESG implementation is distributed across specialized departments:

- Facility Management (energy performance and utilities),
- Revitalization Department (water management and biodiversity),
- HR Department (workforce and human rights),
- Finance and Legal Departments (compliance,



governance, and reporting).

This governance framework supports structured ESG integration and continuous strengthening of sustainability oversight mechanisms.

ESRS 2 GOV-2

Information Flow to Governance Bodies

DL Invest Group maintains structured internal reporting processes to ensure that sustainability-related information is regularly communicated to governance bodies.

ESG information is consolidated and reported through:

- annual energy and utility performance summaries,
- environmental certification updates,
- periodic internal risk assessments,
- ESG strategy implementation reviews.

These processes enable senior management to monitor performance, assess regulatory exposure, and identify material sustainability risks and opportunities.

In 2024, preparation for CSRD significantly enhanced ESG data governance. Structured consolidation procedures were introduced to improve reliability, traceability, and documentation of sustainability metrics. Cross-departmental coordination was strengthened to ensure consistency between operational data and reported disclosures.

This formalized information flow framework supports informed decision-making and reinforces transparency and regulatory readiness in line with ESRS requirements.

ESRS 2 SBM-1

Business Model and Sustainability Integration

DL Invest Group operates as a long-term real estate developer and asset owner in the Polish commercial real estate market. The Company's business model is based on full control over the entire investment lifecycle, allowing for consistent quality management, operational stability, and systematic integration of sustainability considerations across all stages of asset development and operation.

The business model covers the full lifecycle of real estate investments, including:

- land acquisition,
- design and permitting,
- construction,

- commercialization,
- long-term asset management.

Unlike short-term development models focused on asset disposal, DL Invest Group retains ownership of completed properties. This long-term ownership structure enables continuous oversight of technical performance, operational efficiency, and environmental impact. It also allows the Company to implement modernization initiatives, optimize energy performance, and adapt buildings to evolving regulatory requirements and tenant expectations over time.

Sustainability integration is embedded within the Company's operational and investment framework through:

- technical design standards aimed at improving building efficiency and durability,
- capital expenditure allocation supporting modernization and environmental performance improvements,
- gradual integration of renewable energy solutions,
- implementation of environmental certification processes where applicable,
- lifecycle asset modernization planning to maintain long-term operational resilience.

Through this approach, sustainability considerations are incorporated into both development planning and operational management, ensuring that ESG factors contribute directly to long-term asset value and portfolio resilience.

As of 2024, the Company's portfolio comprised 41 operational properties, reflecting the continued expansion of DL Invest Group's asset base while maintaining a focus on operational efficiency and responsible asset stewardship.

ESRS 2 SBM-3

Impacts, Risks and Opportunities (IRO) – Double Materiality

In 2024, DL Invest Group conducted a structured materiality assessment in accordance with ESRS requirements in order to identify the environmental, social, and governance factors most relevant to the Company's operations and long-term strategy.

The assessment followed the double materiality principle,

which evaluates both the impacts of the Company's activities on the environment and society, as well as the potential financial implications of sustainability-related risks and opportunities for the organization itself.

The analysis considered two complementary dimensions:

- impact materiality, assessing environmental and social effects generated by the Company's operations, and
- financial materiality, evaluating risks and opportunities that may influence financial performance, operational resilience, or asset value.

Material environmental impacts, risks, and opportunities identified during the assessment include:

- climate transition risk associated with the EU decarbonization pathway,
- volatility of energy prices and its impact on operational costs,
- physical climate risks such as heatwaves and heavy precipitation,
- carbon intensity of building operations,
- resource consumption intensity, particularly energy and water usage.

Material social impacts and risks relate primarily to:

- workforce competence and organizational readiness for ESG transformation,
- occupational health and safety management,
- the impact of development activities on local communities and surrounding infrastructure.

Material governance-related factors include:

- potential risks of regulatory non-compliance,
- exposure to corruption or unethical conduct within business relationships,
- ESG performance and compliance of suppliers and contractors within the value chain.

The results of the materiality assessment play a key role

in shaping the Company's sustainability strategy and operational priorities. In particular, they support decision-making in areas such as:

- prioritization of modernization-related capital expenditures,
- deployment of renewable energy installations,
- strengthening of governance and compliance mechanisms,
- development of long-term decarbonization objectives.

Through this structured approach, DL Invest Group ensures that sustainability considerations are integrated into strategic planning and risk management processes.

ESRS 2 SBM-4

Strategy and Sustainability-Related Targets

DL Invest Group's sustainability strategy is designed to support long-term operational resilience, regulatory readiness, and responsible value creation. Environmental, social, and governance considerations are progressively integrated into strategic planning, investment decision-making, and asset management processes.

In order to align its operations with evolving regulatory requirements and market expectations, the Company has adopted several long-term sustainability objectives that guide its environmental transformation and portfolio modernization efforts.

Key strategic objectives include:

- an ambition to achieve carbon neutrality by 2040,
- reduction of energy intensity from the baseline level of 152 kWh/m² to a target of 136 kWh/m²,
- development of portfolio-wide photovoltaic installations with a potential capacity exceeding 45 MW,



- progressive formalization and disclosure of Scope 1 and Scope 2 emissions.

These objectives are integrated into the Company's medium-term environmental planning framework covering the period 2024–2040. The implementation of these targets is supported by modernization initiatives, energy efficiency improvements, renewable energy integration, and strengthened ESG data management systems. By establishing measurable sustainability targets and integrating them into strategic planning, DL Invest Group aims to enhance portfolio resilience, mitigate transition risks, and strengthen its long-term competitiveness in a rapidly evolving regulatory and market environment.

ESRS 2 IRO-1 Risk Management Process

DL Invest Group applies a structured risk management framework designed to identify, assess, and mitigate risks that may affect operational stability, financial performance, and long-term asset value. Sustainability-related risks are progressively integrated into the Company's enterprise risk management processes, ensuring that environmental, social, and governance considerations are evaluated alongside traditional financial and operational risks. The risk assessment framework takes into account both internal operational factors and external regulatory and market developments. Particular attention is given to sustainability-related risks that may influence asset performance, regulatory compliance, and long-term competitiveness of the Company's real estate portfolio. The main categories of sustainability-related risks identified within the risk management process include:

- Physical climate risks, such as heatwaves, heavy precipitation, and other extreme weather events that may affect asset resilience and operational continuity,
- Transition risks related to decarbonization policies, evolving environmental standards, and technological changes in the energy sector,
- Regulatory risks, including increasing disclosure requirements under the Corporate Sustainability Reporting Directive (CSRD) and EU Taxonomy regulations,
- Operational efficiency risks, particularly those associated with energy performance and resource consumption,
- Reputational risks, which may arise from non-compliance with ESG expectations of investors, tenants, and other stakeholders.

To mitigate these risks, DL Invest Group implements a range of operational and governance mechanisms, including:

- the ISO 14001-certified environmental management system, supporting structured environmental risk monitoring,
- continuous energy performance monitoring across the property portfolio,
- gradual integration of renewable energy solutions,
- incorporation of ESG-related criteria in supplier selection processes,
- internal compliance and audit procedures supporting governance oversight.

This integrated risk management approach supports proactive identification of emerging sustainability risks and enables the Company to strengthen the long-term resilience of its portfolio.





ESRS 2 MT-1

Climate Ambition and Strategic Direction

DL Invest Group recognizes climate change as a material environmental and financial risk affecting the real estate sector through regulatory developments, energy market volatility, and increasing stakeholder expectations regarding building performance and emissions transparency.

In response to these challenges, the Company has adopted a long-term ambition to achieve carbon neutrality by 2040, aligning its strategic direction with the objectives of the Paris Agreement and the European Union's climate transition framework.

The Company's decarbonization pathway focuses primarily on reducing operational emissions associated with building energy consumption. Given the nature of the real estate sector, electricity and heating systems represent the most significant sources of greenhouse gas emissions across the portfolio.

The climate transition strategy is structured around several key pillars:

- systematic reduction of operational energy intensity,
- progressive expansion of on-site renewable energy generation,
- modernization of HVAC and building infrastructure,
- integration of energy performance standards at the design stage,
- progressive formalization and monitoring of Scope 1 and Scope 2 emissions.

These priorities are incorporated into the Company's 2024–2040 environmental roadmap, which defines measurable performance indicators and guides investment decisions related to energy efficiency improvements and renewable

energy deployment.

Through this structured approach, DL Invest Group aims to gradually reduce the carbon intensity of its operations while strengthening the long-term resilience and competitiveness of its real estate portfolio.

E1-2 Policies Related to Climate Change

Climate-related activities within DL Invest Group are governed by several internal policies and operational frameworks that support environmental performance management and emission reduction initiatives.

The most relevant governance instruments include:

- DL Green Strategy, defining the overall sustainability direction of the Company,
- ISO 14001:2015 Environmental Management System, providing structured environmental risk monitoring and control mechanisms,
- Energy Management Framework (DL Energy) supporting operational energy efficiency initiatives,
- Green Investment Framework guiding environmentally responsible capital expenditure,
- Waste Management Policy, indirectly supporting emission reductions through circular resource management.

These policies support the implementation of practical environmental measures, including:

- optimization of building energy performance,
- reduction of operational greenhouse gas emissions,
- pollution prevention and resource efficiency improvements,
- integration of renewable energy technologies,
- mitigation of climate-related operational risks.

Responsibility for the implementation of climate-related policies is progressively being formalized at the Management Board level, ensuring alignment between sustainability strategy, operational management, and investment planning.

E1-3 Actions and Resources Related to Climate Change

Energy Efficiency Modernization

Improving energy efficiency across the property portfolio remains a central component of DL Invest Group's climate mitigation strategy. In 2024, several operational initiatives aimed at reducing energy consumption and improving building performance were implemented or continued.

These actions included:

- portfolio-wide transition to LED lighting systems,
- modernization of HVAC installations in selected facilities,
- expansion of Building Management Systems (BMS) enabling advanced monitoring of energy consumption,
- implementation of energy performance audits supporting modernization planning and capital expenditure prioritization.

These measures contribute to improving operational efficiency and reducing the carbon intensity of building operations.

Renewable Energy Deployment

DL Invest Group has identified significant potential for on-site renewable energy generation across its property portfolio.

The estimated photovoltaic installation capacity is approximately 45 MW, including:

- approximately 35 MW of rooftop photovoltaic installations,
- approximately 9.8 MW of ground-mounted photovoltaic systems.

Once fully deployed, these installations could generate substantial quantities of renewable electricity and contribute to an estimated annual emission reduction potential of approximately 17 million kg of CO₂.

The rollout of photovoltaic installations is planned to be

implemented gradually through 2028, in line with technical feasibility assessments and investment planning.

Green Mobility

In addition to energy-related initiatives, DL Invest Group supports sustainable transport solutions across its developments.

Measures implemented include:

- installation of electric vehicle charging stations at selected logistics and retail properties,
- gradual electrification of selected operational fleet vehicles,
- development of bicycle infrastructure within selected projects.

These initiatives contribute indirectly to reducing transport-related emissions associated with property use.

E1-4 Targets Related to Climate Change

DL Invest Group has defined several measurable environmental targets aimed at reducing the carbon intensity of its real estate portfolio and improving operational energy efficiency.

Energy Intensity Target

The Company has established a structured energy efficiency improvement pathway based on energy consumption intensity indicators.

- Baseline: 152 kWh/m²/year
- Target: 136 kWh/m²/year
- Time horizon estimation: 4 years

Achieving this target is supported by building modernization initiatives, implementation of digital monitoring systems, and gradual deployment of renewable energy sources.

Carbon Neutrality Ambition

In the longer term, DL Invest Group aims to achieve net-zero operational emissions by 2040.

Intermediate steps supporting this objective include:

- progressive formalization of Scope 1 and Scope 2 emissions disclosure,
- expansion of renewable energy installations across the portfolio,

- continuous improvement of emission monitoring and reporting systems.

E1-5 Energy Consumption and Mix

Energy consumption across the portfolio has increased over the reporting period primarily as a result of the expansion of DL Invest Group's operational portfolio. At the same time, intensity indicators provide a more accurate reflection of operational efficiency.

Electricity Consumption (2021–2024)

Year	Properties	Electricity (kWh)	kWh/m ²
2021	26	14,799,478.82	109.93
2022	30	21,768,063.38	100.43
2023	32	29,140,026.01	99.84
2024	41	36,109,528.54	108.90

The increase in total electricity consumption reflects the growth of the portfolio to 41 properties in 2024. However, energy intensity indicators remain relatively stable, indicating scalable operational efficiency despite portfolio expansion.

Natural Gas Consumption (Heating)

Year	Gas (m ³)	m ³ /m ²
2021	146,845	5.63
2022	357,340	5.33
2023	344,730	3.94
2024	632,403.91	3.59

Although total natural gas consumption increased with portfolio expansion, gas intensity per square meter has significantly decreased, indicating improved heating efficiency across the portfolio.

E1-6 Gross GHG Emissions

In 2024, DL Invest Group monitored greenhouse gas emissions associated with the operation of its real estate portfolio. Emissions were calculated in accordance with the Greenhouse Gas Protocol methodology, which classifies emissions into three categories: Scope 1, Scope 2, and Scope 3.

Greenhouse Gas Emissions – 2024

Scope	Emissions 2024 (tCO ₂ e)	Description
Scope 1	1,457	• Direct emissions from natural gas consumption and refrigerant leakage
Scope 2	26,143	• Indirect emissions from purchased electricity
Scope 3	350	• Emissions associated with waste generated in operations
Total	27,950	• Total greenhouse gas emissions

Indirect emissions related to purchased electricity (Scope 2) represent the dominant share of the Company's carbon footprint. Direct emissions from natural gas consumption and refrigerants constitute a smaller portion of total emissions, while emissions associated with operational waste represent a relatively minor contribution. The emission structure confirms that electricity consumption remains the primary driver of operational emissions within the portfolio.

E1-7 GHG Removals and Carbon Credits

As of 2024:

- DL Invest Group does not use external carbon credits,
- no formal carbon offsetting mechanisms are implemented,
- emission reductions are achieved primarily through energy efficiency improvements and renewable energy deployment.

The Company currently prioritizes direct emission reductions within its own operations rather than reliance on external offset mechanisms.

E1-8 Internal Carbon Pricing

As of the reporting year 2024:

- DL Invest Group has not implemented an internal carbon pricing mechanism,
- climate transition risks are considered qualitatively within investment planning and capital expenditure decisions.

The Company continues to monitor regulatory developments related to carbon pricing frameworks within the European Union.

E1-9 Anticipated Financial Effects of Climate Change

Climate change may generate both transition and physical risks for the real estate sector.

Transition Risks

Potential transition-related risks include:

- tightening EU energy efficiency regulations,
- increased reporting requirements under CSRD,
- financing conditions increasingly linked to ESG performance indicators,
- potential introduction or expansion of carbon pricing mechanisms.

Physical Risks

Physical climate risks may include:

- heatwaves increasing building cooling demand,
- heavy precipitation affecting drainage systems,
- localized flood risks in selected regions.

Financial Mitigation Measures

To mitigate these risks, DL Invest Group implements several strategic measures, including:

- investments in renewable energy generation,
- energy intensity reduction programs,
- digital monitoring infrastructure for energy performance,
- long-term portfolio modernization planning.

Climate-related considerations are increasingly integrated into strategic planning, investment evaluation, and long-term asset valuation processes.

Strategic Climate Outlook

DL Invest Group's climate strategy is transitioning from isolated operational efficiency improvements toward a structured decarbonization governance framework integrated with long-term asset management and financial planning.

Key priorities for the period 2025–2027 include:

- further development of Scope 1 and Scope 2 emissions reporting,
- improvement of emission accounting methodologies,
- expansion of renewable energy installations across the portfolio,
- strengthening of climate oversight within governance structures,
- enhancement of ESG data governance in preparation for CSRD assurance.

Through these actions, DL Invest Group aims to progressively reduce the carbon intensity of its operations while strengthening transparency, regulatory readiness, and long-term sustainability performance.

E2-1 Policies Related to Pollution

DL Invest Group recognizes pollution prevention as an important component of environmental risk management. The Company's activities, particularly those related to building operation and energy systems, may generate certain types of emissions or environmental pressures. These include combustion-related air emissions, refrigerant leakage from cooling systems, particulate matter, trace hazardous substances, as well as risks related to waste



handling and potential contamination of soil or water. Although the overall scale of pollutant emissions associated with the Company's operations remains limited compared with heavy industry sectors, DL Invest Group applies precautionary environmental management principles to ensure that potential pollution risks are systematically identified, monitored, and mitigated.

Pollution-related governance is embedded within several internal policies and operational procedures, including:

- ISO 14001:2015 Environmental Management System,
- Waste Management Policy,
- HVAC maintenance procedures,
- construction and contractor environmental compliance requirements,
- risk-based internal environmental control mechanisms.

The ISO 14001 framework provides a structured approach to environmental management across the portfolio, enabling systematic identification of pollution risks, implementation of preventive measures, and regular internal environmental monitoring.

Through this governance structure, DL Invest Group aims to ensure compliance with environmental regulations while minimizing the potential environmental impact of its operations

E2-2 Actions and Resources Related to Pollution

DL Invest Group implements a range of operational measures aimed at reducing pollutant emissions and preventing environmental contamination across its

property portfolio. These measures focus primarily on building infrastructure modernization, responsible handling of potentially hazardous materials, and structured waste management systems.

1. Combustion Emission Reduction

Emissions related to combustion processes originate primarily from natural gas used for heating systems in certain facilities. In order to reduce these emissions and improve overall energy efficiency, several actions were implemented or continued in 2024:

- modernization of HVAC systems to improve combustion efficiency,
- optimization of heating system operation to reduce NOx and CO emissions,
- gradual reduction of gas consumption intensity (m^3/m^2),
- implementation of broader energy efficiency measures reducing fossil fuel demand.

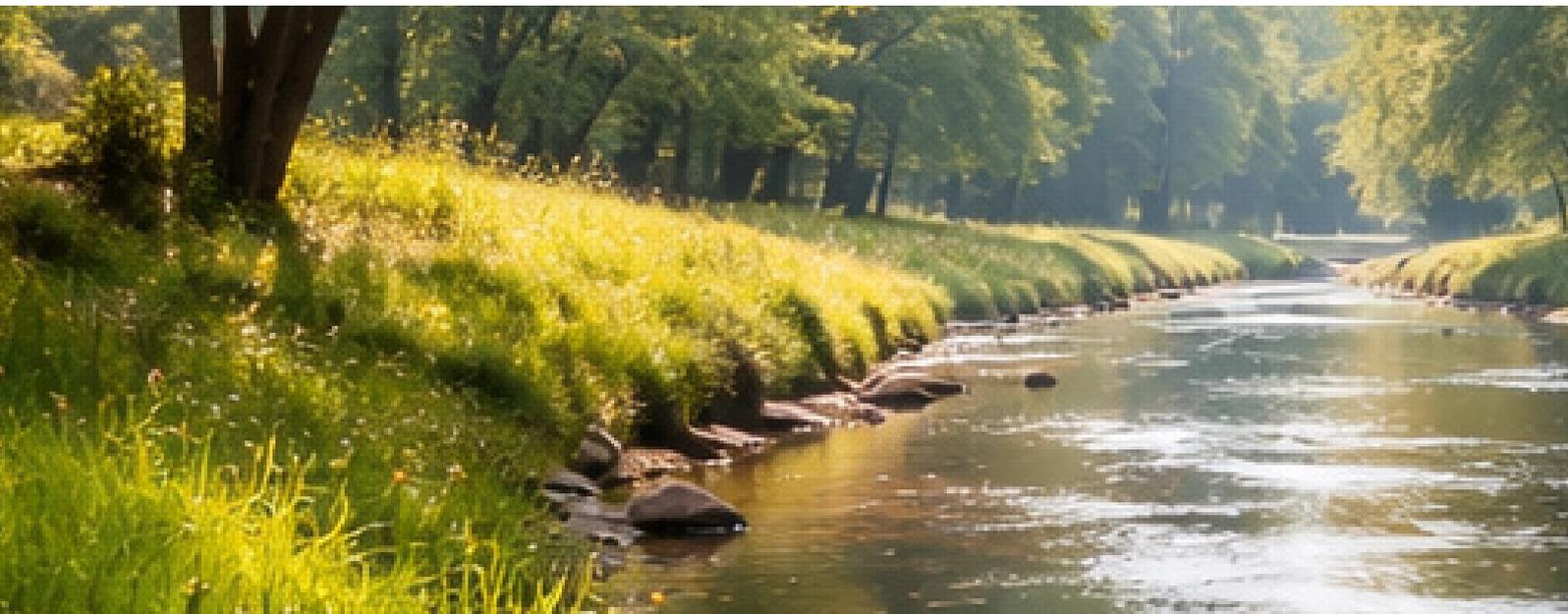
These actions contribute to both emission reduction and improved operational efficiency of building infrastructure.

2. Refrigerant Management (F-Gases)

Cooling systems used in certain buildings contain fluorinated gases (F-gases), which have a high global warming potential. Although emissions associated with refrigerants remain low in absolute volume, they are subject to monitoring and control.

The Company applies the following management practices:

- systematic monitoring of refrigerant leakage,
- controlled maintenance of cooling systems,
- cooperation with certified service providers,



These procedures support early detection of potential leaks and ensure compliance with applicable environmental regulations related to fluorinated gases.

3. Waste and Hazardous Material Control

Waste generated within the Company's operations is managed through structured segregation and disposal procedures designed to minimize environmental risks. Key actions include:

- implementation of waste segregation systems across properties,
- installation of battery disposal points preventing soil contamination,
- cooperation with certified electronic waste recycling entities,
- monitoring of construction waste streams during development projects.

These measures support responsible waste management while reducing risks of environmental contamination.

4. Pollution Prevention Controls

Preventive environmental protection measures are also implemented within the technical infrastructure of the Company's assets.

These include:

- installation of filtration and separation systems where required,
- design of drainage and water retention systems reducing runoff risks,
- implementation of soil protection measures during construction,
- regular internal environmental inspections

conducted under the ISO 14001 framework.

Together, these measures provide a preventive approach to pollution risk management and support long-term environmental compliance.

E2-3 Targets Related to Pollution

As of 2024, DL Invest Group has not adopted separate absolute pollutant reduction targets distinct from its broader climate and energy efficiency objectives. This reflects the relatively limited scale of pollutant emissions associated with the Company's operations.

Instead, pollution reduction is addressed indirectly through broader environmental initiatives, including:

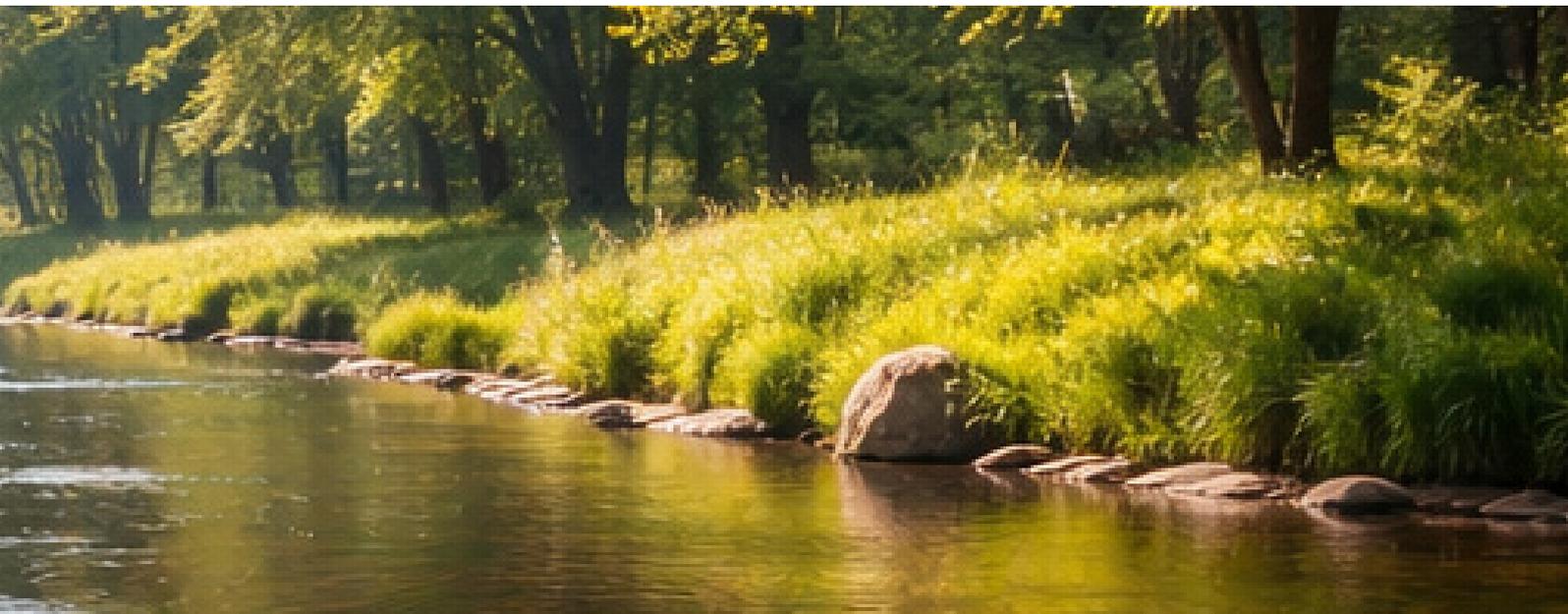
- energy intensity reduction targets,
- modernization of heating systems,
- increased integration of renewable energy sources,
- implementation of ISO-certified environmental management procedures.

These measures contribute simultaneously to emission reduction, improved operational efficiency, and reduced environmental impact.

Looking forward, the Company is considering further development of pollution monitoring frameworks. Planned improvements for the period 2025–2027 include:

- potential introduction of formalized pollutant-related KPIs,
- improved monitoring granularity for selected emissions,
- expansion of the refrigerant monitoring framework.

E2-4 Pollution of Air



Air emissions associated with DL Invest Group’s operations are primarily related to natural gas combustion used for heating systems and, to a lesser extent, refrigerant use in cooling installations.

The Company monitors these emissions as part of its environmental reporting and operational risk management framework.

Greenhouse Gases (linked to E1)

Pollutant	Unit	2024 Value
CO ₂	kg/year	1,352,713.21
HFC-125	kg/year	26.00
HFC-32	kg/year	26.00

These emissions are presented for completeness and correspond to greenhouse gas emissions discussed in detail in ESRS E1 – Climate Change.

Combustion-Related Air Pollutants

Pollutant	Unit	2024 Value	Source
Carbon Monoxide (CO)	kg/year	701.57	Heating systems
Nitrogen Oxides (NOx / NO₂)	kg/year	949.33	Combustion processes
Sulfur Oxides (SOx / SO₂)	kg/year	25.35	Combustion processes

Emission levels are primarily associated with natural gas combustion in heating systems.

Key drivers contributing to emission reduction include:

- improved gas consumption intensity (3.59 m³/m² in 2024 vs 5.63 in 2021),
- modernization of HVAC infrastructure,
- progressive expansion of renewable energy

solutions.

Particulate Matter

Pollutant	Unit	2024 Value
Total Suspended Particles (TSP)	kg/year	13.75
PM10	kg/year	11.98
PM2.5	kg/year	11.98

Particulate emissions remain limited in scale and are primarily associated with combustion-related processes in heating systems.

Hazardous Trace Substances

Substance	Unit	2024 Value
Benzo(a)pyrene	kg/year	0.0000386

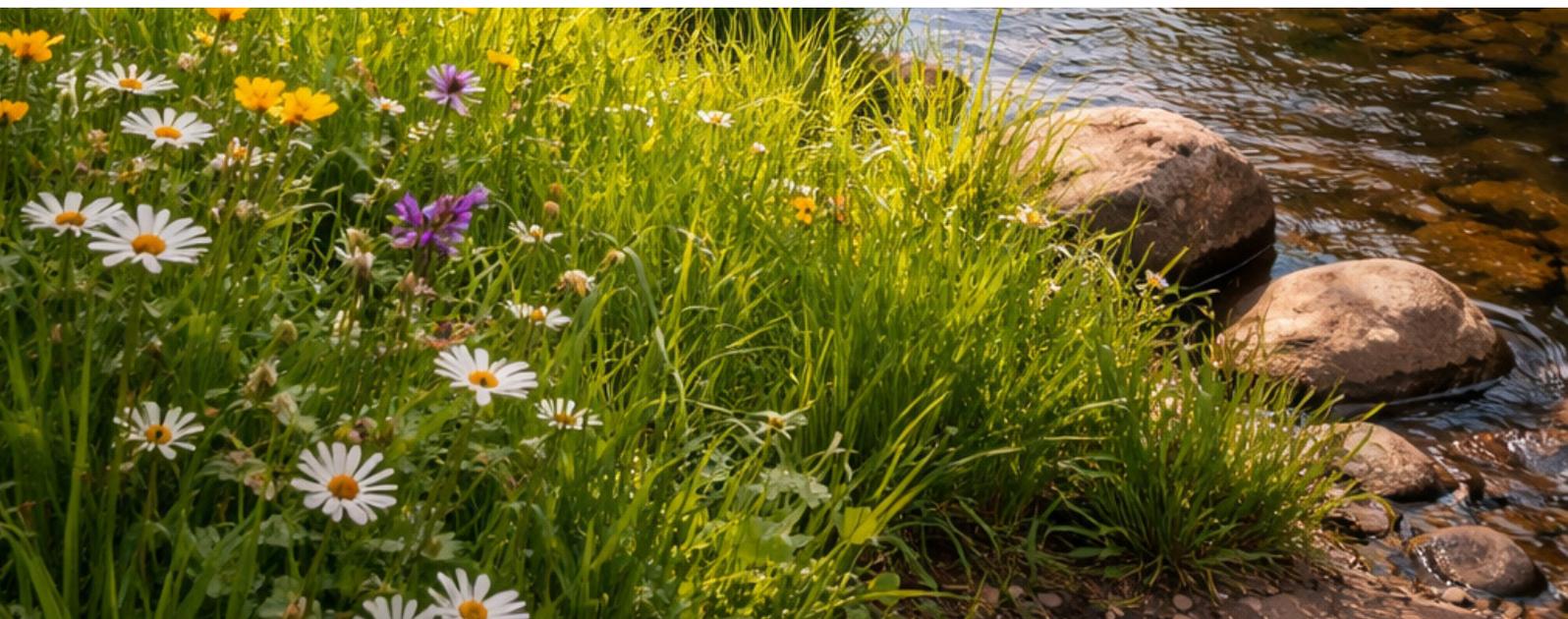
The substance is reported in accordance with environmental transparency standards despite its negligible quantitative volume.

E2-5 Pollution of Water and Soil

As of the reporting year 2024, DL Invest Group did not record any significant incidents of water or soil contamination associated with its operations.

Specifically:

- no material environmental fines related to pollution were reported,
 - no incidents of accidental hazardous discharge were identified,
 - no significant contamination events were recorded across the operational portfolio.
- Preventive environmental protection measures implemented by the Company include:
- structured drainage systems within properties,



- installation of filtration and separation systems,
- implementation of waste management procedures,
- enforcement of environmental compliance requirements for contractors.

These preventive controls are designed to minimize the risk of environmental contamination and ensure compliance with applicable environmental regulations.

Through continuous monitoring, preventive infrastructure design, and structured environmental management procedures, DL Invest Group aims to maintain a high standard of environmental protection across its portfolio.

E2-6 Substances of Concern and Very High Concern

DL Invest Group does not engage in the production, processing, or distribution of chemical products. As a real estate developer and long-term asset owner, the Company's operational activities involve only limited use of certain chemical substances associated with building maintenance and facility management.

The use of substances of concern within the Company's operations is therefore restricted primarily to operational support activities and technical installations. In practice, these substances are limited to:

- refrigerants used in HVAC systems,
- cleaning agents used in facility management operations.

All handling, storage, and servicing of such substances are conducted in accordance with applicable regulatory and environmental management standards. In particular, the Company ensures compliance with:

- relevant national environmental and chemical safety regulations,
- internal procedures established under the ISO 14001 environmental management system,
- supplier documentation and compliance requirements provided by certified contractors and service providers.

The Company does not intentionally produce, distribute, or commercially handle Substances of Very High Concern (SVHC) as defined under the REACH regulatory framework. Where substances potentially classified as hazardous are

used within building systems or maintenance processes, their handling is performed by qualified service providers and subject to appropriate safety procedures.

Through this approach, DL Invest Group ensures responsible management of substances used in operational processes while minimizing environmental and health-related risks.

E2-7 Anticipated Financial Effects of Pollution

Although pollution-related emissions associated with the Company's activities remain relatively limited compared with more emission-intensive industries, DL Invest Group recognizes that environmental regulations and market expectations continue to evolve. These developments may create certain financial risks or compliance obligations over time.

Potential financial risks related to pollution and environmental regulation include:

- tightening air emission standards and environmental regulations,
- possible introduction or expansion of carbon taxation mechanisms,
- stricter technical compliance requirements for HVAC and refrigeration systems,
- potential environmental liability exposure associated with pollution incidents.

To mitigate these risks, DL Invest Group applies a preventive environmental management approach supported by several operational and governance mechanisms. These include:

- proactive modernization of building infrastructure,
 - continued investment in renewable energy solutions,
 - environmental monitoring under the ISO 14001-certified management framework,
 - maintenance of structured environmental compliance documentation and internal controls.
- Based on current operational characteristics and environmental monitoring results, pollution-related risks are assessed as controlled and not material to the Company's financial stability.

Strategic Pollution Outlook (2025–2027)

Looking ahead, DL Invest Group plans to further strengthen its pollution monitoring and prevention framework as part of broader environmental management and decarbonization efforts.

Key improvement priorities for the period 2025–2027 include:

- enhanced refrigerant inventory management,
- further reduction of natural gas consumption intensity,
- gradual transition toward electrification of selected building systems where technically feasible,
- integration of pollutant monitoring indicators into digital ESG reporting dashboards.

Pollution prevention will remain closely linked to the Company's broader climate and resource efficiency strategies. By combining modernization initiatives, improved monitoring tools, and responsible operational practices, DL Invest Group aims to maintain a high level of environmental protection while supporting the long-term sustainability of its real estate portfolio.

ESRS E3 – Water and Marine Resources

E3-1 Policies Related to Water and Marine Resources

DL Invest Group recognizes water as an important natural resource within the operational management of its real estate portfolio. Although water consumption associated with the Company's activities is moderate compared with water-intensive industries, responsible water management remains an integral component of the Company's

environmental governance framework.

Water use across the portfolio is primarily associated with day-to-day building operations and tenant activities. The main sources of water consumption include:

- sanitary facilities within buildings,
- tenant operational activities,
- irrigation of landscaped and green areas,
- selected technical processes in logistics and mixed-use assets.

The Company integrates water management considerations into its broader environmental management system and operational procedures. Water governance is supported through several internal frameworks, including:

- DL Green Strategy, defining environmental performance objectives,
- ISO 14001:2015 Environmental Management System, providing structured environmental monitoring and control,
- waste management and pollution prevention procedures,
- technical asset management standards applied at property level.

DL Invest Group applies a preventive and efficiency-oriented approach to water management. The Company focuses on monitoring consumption patterns, improving operational efficiency, and reducing unnecessary water use wherever feasible.

Key elements of this approach include:

- systematic water consumption monitoring,
- benchmarking of water intensity indicators (m^3/m^2),
- exploration of greywater reuse solutions where technically feasible,
- integration of rainwater retention systems in selected developments,

- implementation of leak detection and infrastructure optimization measures.

Operational responsibility for water management is coordinated primarily by the Revitalization Department and Facility Management teams, which oversee monitoring of consumption levels and implementation of efficiency improvements across the property portfolio. Through these measures, DL Invest Group aims to ensure responsible water resource management while supporting the long-term environmental sustainability of its operations.

E3-2 Actions and Resources Related to Water Management

DL Invest Group implements a range of operational measures aimed at improving water efficiency and ensuring responsible water management across its property portfolio. These initiatives focus primarily on monitoring water consumption, optimizing building infrastructure, and mitigating environmental risks associated with water use. The Company's approach combines data monitoring, technical improvements, and preventive infrastructure solutions designed to reduce unnecessary water consumption while maintaining operational reliability.

1. Monitoring and Intensity Benchmarking

Water consumption is systematically monitored across the portfolio in order to track efficiency and identify potential improvement areas. Consumption data is analyzed annually and expressed both as total consumption and as an intensity indicator relative to the size of the portfolio.

The primary metrics used for monitoring include:

- total water consumption (m^3) across the portfolio,
- water intensity per square meter (m^3/m^2).

To support long-term efficiency improvements, internal

benchmarking parameters have been defined:

- Baseline: 137 litres/ m^2 /year
- Target: 119 litres/ m^2 /year

Monitoring and benchmarking enable consistent comparison of water performance across 41 operational properties as of 2024, supporting informed operational management and long-term resource efficiency planning.

2. Technological Optimization Measures

DL Invest Group continues to implement technological solutions aimed at improving water efficiency in building operations. In 2024, several modernization and optimization measures were implemented or expanded across selected properties.

These measures included:

- gradual replacement of sanitary fixtures with low-flow systems,
- installation of timed faucet systems reducing unnecessary water flow,
- deployment of reduced-flush toilet installations,
- implementation of pressure optimization systems,
- monitoring of abnormal water usage patterns supporting leak detection.

In addition to standard efficiency measures, selected assets have introduced more advanced water management solutions, including:

- greywater recycling systems,
- rainwater retention tanks used for irrigation purposes,
- irrigation systems adjusted to vegetation type in order to reduce evaporation losses.

These initiatives support responsible water resource management while reducing operational consumption levels.

3. Infrastructure Risk Mitigation

In addition to consumption efficiency measures, DL Invest Group also implements infrastructure solutions aimed at mitigating environmental risks associated with water management.

To reduce potential environmental impacts, the following preventive measures are applied:

- installation of filtration and separator systems in selected facilities,
- development of drainage systems designed to mitigate heavy precipitation risks,
- performance of geological and hydrological analyses prior to new developments.

Infrastructure planning is adapted to local environmental conditions and regulatory frameworks, ensuring that water-related systems are designed in accordance with both environmental protection requirements and operational safety considerations.

E3-3 Targets Related to Water

DL Invest Group has established internal performance targets aimed at improving water efficiency across its real estate portfolio. These targets support the Company's broader environmental management objectives and contribute to reducing resource consumption intensity.

Water Intensity Target

The Company has adopted a water consumption intensity target designed to improve efficiency in building operations:

- Baseline: 137 litres/m²/year
- Target: 119 litres/m²/year
- Time horizon: medium-term (within the five-year

environmental roadmap)

Achieving this target is supported by a combination of technical and operational measures, including:

- modernization of sanitary fixtures and building infrastructure,
- increased use of rainwater reuse systems,
- integration of greywater recycling technologies,
- awareness initiatives encouraging responsible water use.

These actions are expected to contribute to gradual reductions in water consumption intensity while maintaining operational efficiency.

E3-4 Water Withdrawal, Consumption and Discharge

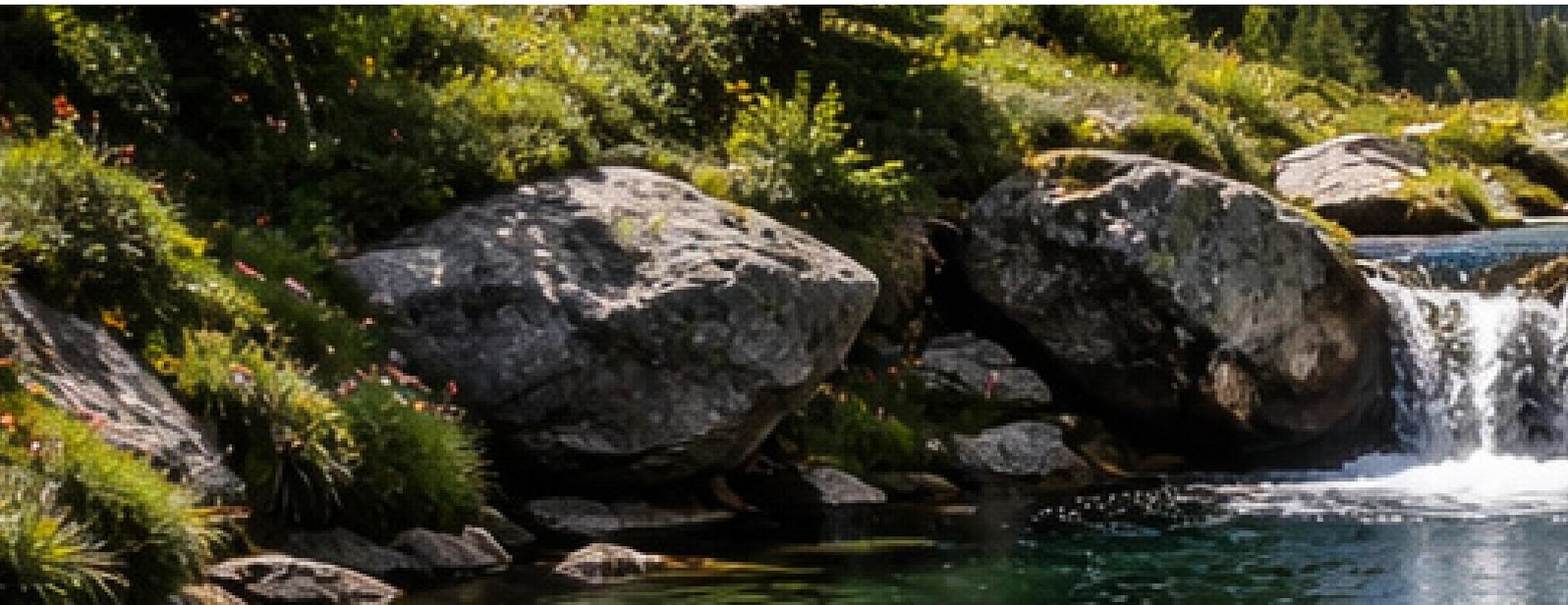
Water consumption across DL Invest Group's portfolio is monitored on an annual basis in order to assess operational efficiency and track resource use trends. Consumption levels are influenced both by operational factors and by the expansion of the Company's property portfolio over time.

Portfolio Water Consumption (2021–2024)

Year	Properties	Total Consumption (m ³)	m ³ /m ²
2021	26	40,175.08	0.23
2022	30	66,118.92	0.27
2023	32	91,318.78	0.28
2024	41	89,047.56	0.27

Key Observations

Analysis of the data indicates several important trends in portfolio water consumption:



- the portfolio expanded to 41 operational properties in 2024,
- total water consumption decreased by 2,271.22 m³ year-on-year,
- water intensity remained relatively stable at 0.27 m³/m²,
- increases in consumption observed between 2021 and 2023 were largely driven by portfolio expansion rather than structural inefficiency,
- 2024 results indicate operational stabilization despite continued asset growth.

Water used within the portfolio is sourced primarily from municipal water supply systems. The Company does not conduct direct abstraction from surface water or groundwater bodies.

Wastewater generated within the properties is discharged through municipal sewage systems, in accordance with local environmental regulations and infrastructure requirements.

Through continuous monitoring and efficiency improvements, DL Invest Group aims to maintain responsible water management practices while supporting the long-term sustainability of its real estate portfolio.

E3-5 Water-Related Impacts, Risks and Opportunities (IRO)

DL Invest Group analyzes water-related impacts, risks, and opportunities as part of its broader environmental risk management framework. Although the Company's operations are not water-intensive compared with industrial sectors, water availability, infrastructure resilience, and regulatory developments may still influence

operational performance and asset management strategies.

The risk assessment considers both physical risks related to climate change and transition risks associated with evolving environmental regulations and resource management expectations.

Physical Risks

Potential physical risks related to water resources include:

- increased frequency of heavy precipitation events,
- localized flooding risk in selected regions,
- potential drought conditions affecting irrigation demand for landscaped areas.

These risks may influence infrastructure requirements, maintenance planning, and water management practices across the property portfolio.

Transition Risks

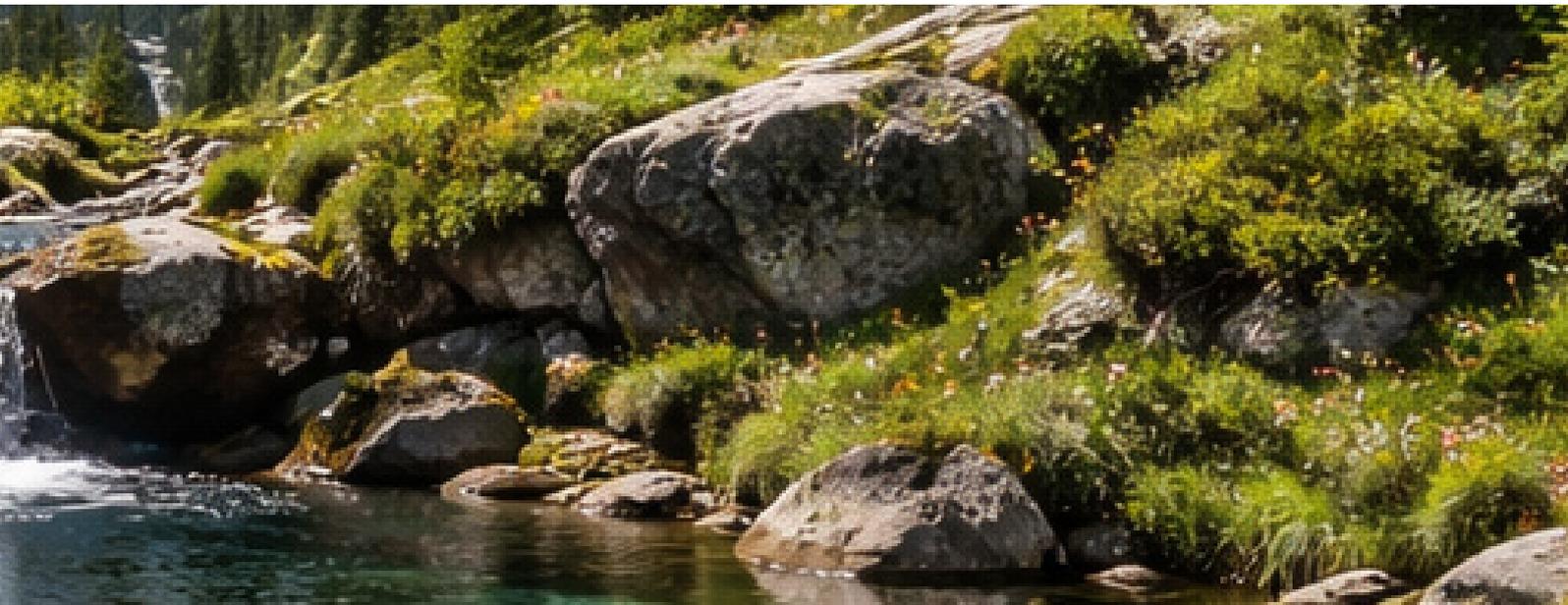
In addition to physical risks, several transition-related risks are monitored, including:

- potential tightening of water efficiency regulations,
- possible increases in municipal water tariffs,
- expanded disclosure obligations under ESRS E3 and related sustainability reporting standards.

Mitigation Measures

DL Invest Group applies preventive measures aimed at reducing exposure to water-related risks and improving resource efficiency across its properties. Key mitigation actions include:

- installation of rainwater retention infrastructure,
- implementation of leak detection systems,
- gradual reduction of reliance on potable water through greywater reuse,



- infrastructure design adapted to local hydrological conditions.

Based on current operational conditions and monitoring results, water-related risk exposure is assessed as moderate and manageable.

E3-6 Anticipated Financial Effects

Water-related risks and regulatory developments may generate certain financial implications for the Company in the medium and long term. These effects are primarily associated with infrastructure modernization requirements and evolving resource management costs.

Potential financial implications include:

- increasing municipal water tariffs,
- capital expenditures related to infrastructure modernization and efficiency improvements,
- potential insurance exposure linked to flooding events in selected locations.

To mitigate these potential impacts, DL Invest Group applies several operational and strategic measures, including:

- monitoring and managing water consumption intensity,
- implementation of digital monitoring systems supporting efficient resource management,
- preventive infrastructure planning designed to reduce operational risks.

Improvements in water management contribute not only to environmental performance but also to financial resilience. Efficient water use supports:

- operational cost stability,

- regulatory readiness in the context of evolving environmental reporting requirements,
- enhanced asset attractiveness for ESG-oriented tenants and investors.

Strategic Water Outlook (2025–2027)

Looking ahead, DL Invest Group plans to continue strengthening its water management framework as part of broader environmental and operational optimization efforts. The Company aims to gradually improve monitoring capabilities and integrate water management more closely into long-term asset lifecycle planning.

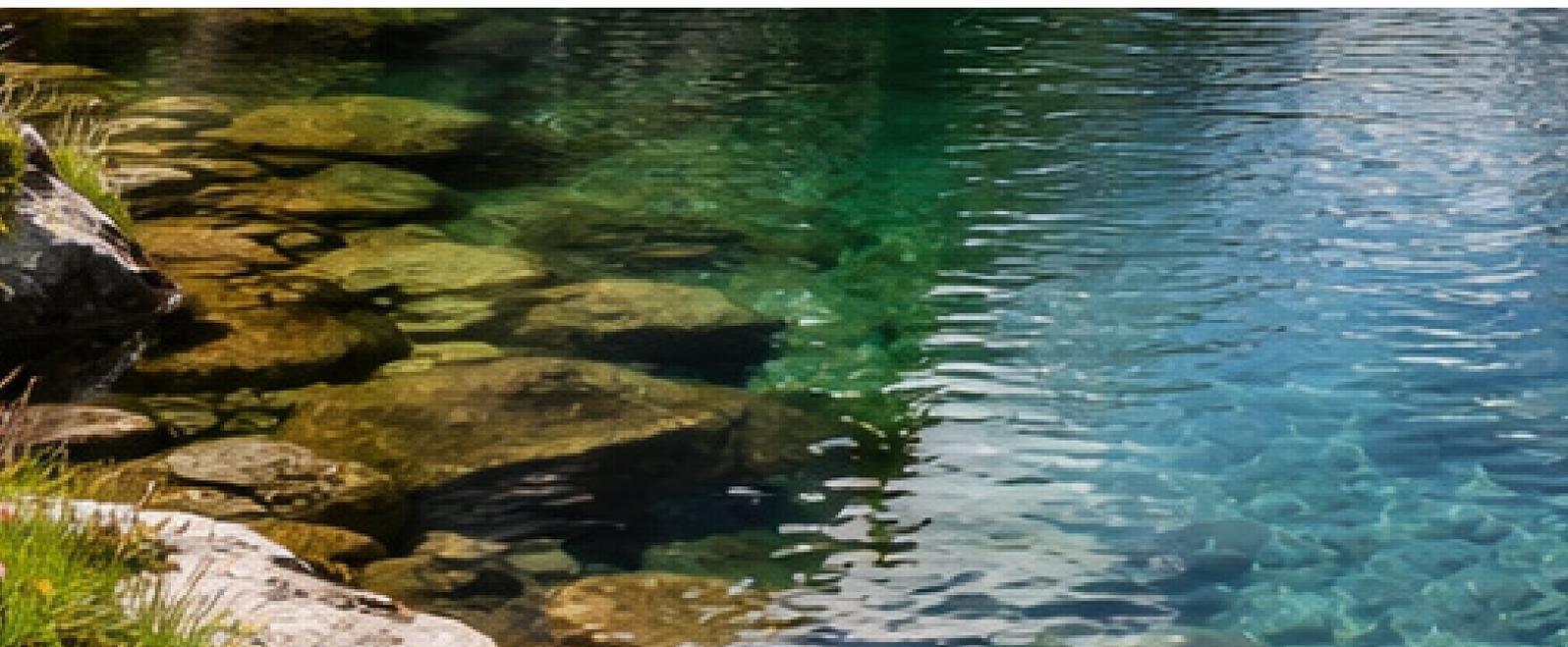
Key priorities for the period 2025–2027 include:

- continued modernization of sanitary infrastructure,
- expansion of greywater reuse solutions where technically feasible,
- further integration of rainwater retention systems,
- improved granularity and accuracy of water monitoring data,
- progressive alignment with ESRS E3 disclosure requirements.

Through these initiatives, water governance within DL Invest Group is gradually evolving from basic operational monitoring toward a more structured approach to resource stewardship and long-term sustainability management.

ESRS E5 – Resource Use and Circular Economy

E5-1 Policies Related to Resource Use and Circular Economy



DL Invest Group recognizes resource efficiency and circular economy principles as important components of long-term asset resilience and responsible resource management. By integrating circular economy considerations into development and operational processes, the Company seeks to reduce material consumption, improve lifecycle efficiency, and support sustainable value creation.

Circular economy principles are embedded within several internal policies and operational frameworks, including:

- DL Green Strategy,
- Waste Management Policy,
- ISO 14001:2015 Environmental Management System,
- Sustainable Construction Standards,
- Procurement and Supplier Selection Procedures.

These frameworks support a structured approach to responsible resource use across the lifecycle of real estate assets.

DL Invest Group's circular economy approach extends beyond traditional waste management and focuses on broader resource efficiency objectives, including:

- reduction of material intensity in development processes,
- enhancement of lifecycle durability of assets,
- prevention of waste generation at the source,
- integration of recycled and lower-impact materials,
- increased digitalization of administrative and operational processes.

Circular economy governance is integrated into several operational stages, including construction planning,

building modernization, procurement processes, and long-term asset management.

Through these initiatives, DL Invest Group aims to reduce resource consumption, improve operational efficiency, and support sustainable development across its property portfolio.

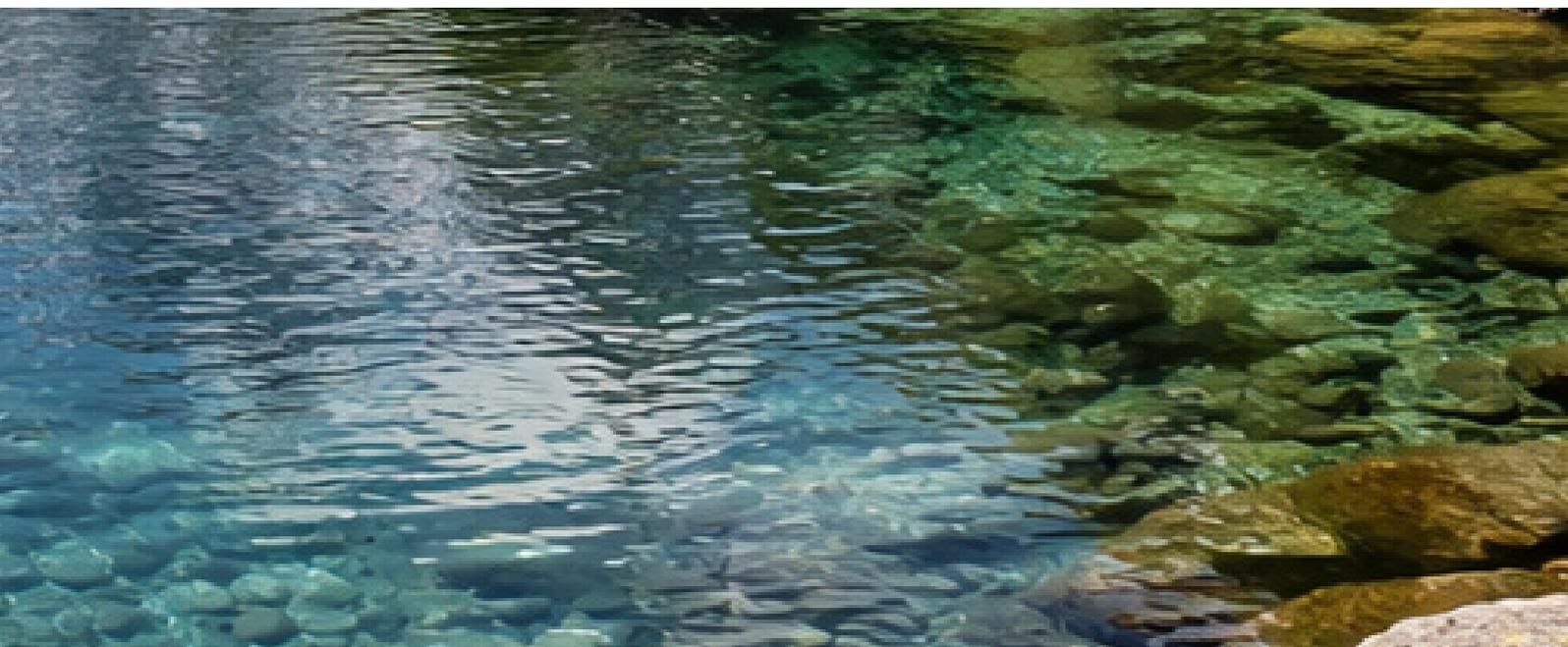
E5-2 Actions and Resources Related to Circular Economy

DL Invest Group implements a number of operational and organizational measures aimed at improving resource efficiency and supporting circular economy principles across its property portfolio. These initiatives focus primarily on responsible waste management, optimization of construction material use, and reduction of unnecessary resource consumption in administrative processes.

The Company's actions are implemented both during the development phase of new projects and during the operational management of existing assets. By integrating circular economy practices into construction processes, facility management, and internal operations, DL Invest Group aims to reduce waste generation and improve resource recovery across its activities.

1. Waste Segregation and Recycling Systems

Across logistics, retail, and office properties managed by the Company, structured waste segregation systems have been implemented to support responsible waste management and recycling.



These systems include:

- dedicated waste segregation infrastructure within buildings,
- separate recycling streams for paper, plastic, glass, and metals,
- installation of battery collection points preventing environmental contamination,
- cooperation with certified electronic waste recycling entities.

Through these measures, the Company seeks to reduce mixed waste streams and increase the share of materials directed toward recycling and recovery processes.

2. Construction Waste Management

Circular economy principles are also integrated into the development and modernization phases of real estate projects. Construction activities may generate significant volumes of waste, therefore, the Company requires contractors to implement responsible waste management practices.

Key measures include:

- contractual requirements for construction waste segregation,
- monitoring of construction waste streams during project execution,
- prioritization of recyclable materials where technically feasible,
- encouragement of material recovery and reuse practices.

Environmental clauses related to waste management and resource efficiency are incorporated into procurement and

contractor documentation in order to ensure compliance with environmental standards.

3. Integration of Recycled Materials

Where technically and economically feasible, DL Invest Group promotes the use of recycled or resource-efficient materials in construction and modernization projects.

Examples of such materials may include:

- recycled concrete elements,
- reclaimed wood,
- recycled glass,
- other resource-efficient construction materials.

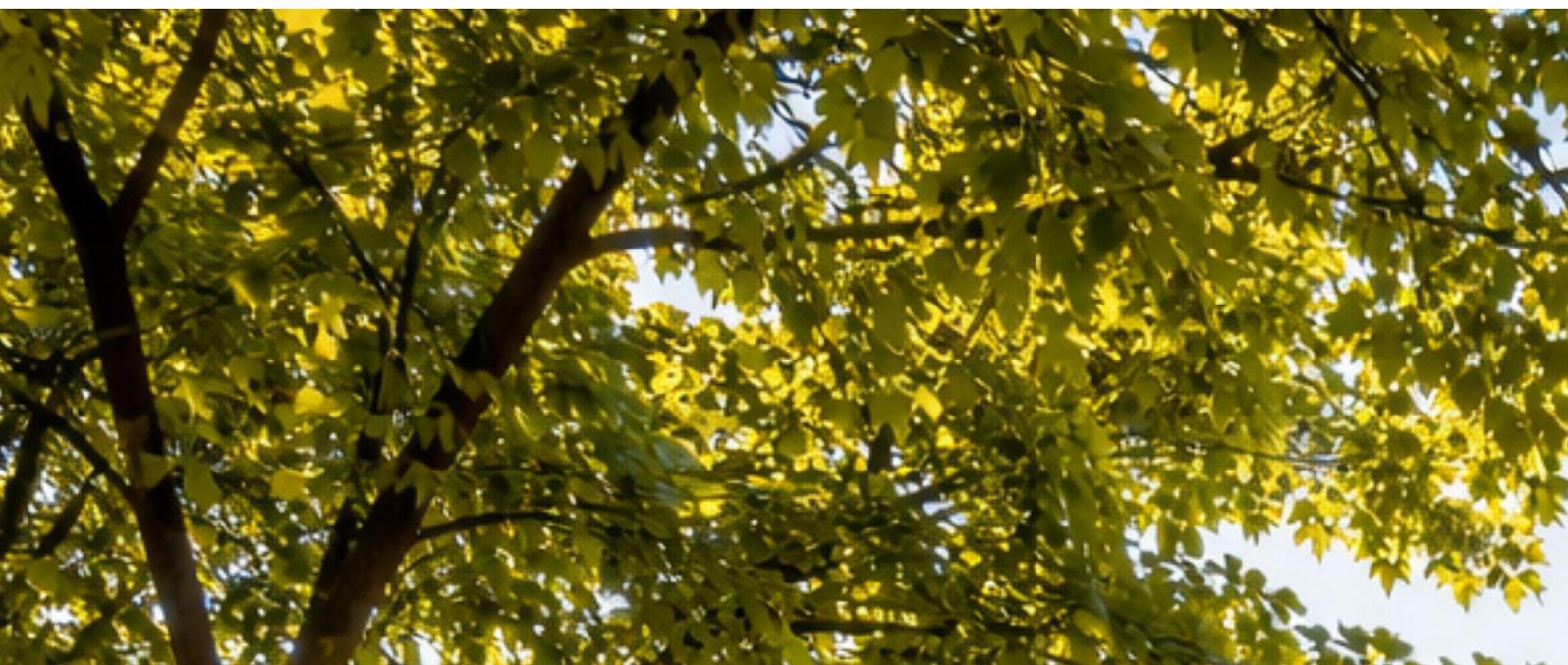
The integration of recycled materials contributes to reducing demand for virgin raw materials while also lowering the embodied carbon intensity of construction processes.

4. Digitalization and Paper Reduction

Digital transformation of internal processes represents another important element of the Company's circular economy strategy. By reducing reliance on physical documentation and paper-based workflows, DL Invest Group aims to minimize administrative waste generation. In 2024, several initiatives were implemented to support this objective:

- introduction of an electronic invoice workflow system,
- further digitization of administrative processes,
- increased use of electronic documentation management systems.

These changes resulted in:



- a significant reduction in paper consumption,
- lower volumes of administrative waste,
- improved data traceability and reporting capabilities for ESG disclosures.

5. Plastic Reduction Initiatives

DL Invest Group also promotes responsible consumption practices aimed at reducing the use of single-use plastics within its operations.

Initiatives implemented include:

- installation of water dispensers in selected facilities,
- reduction of single-use plastic bottles in internal operations,
- internal awareness initiatives promoting responsible consumption.

Although these measures represent relatively small operational changes, they contribute to broader efforts aimed at improving resource efficiency and reducing environmental impact.

E5-3 Targets Related to Resource Use and Circular Economy

DL Invest Group continues to develop its circular economy framework in line with broader environmental strategy objectives. As of the reporting year 2024, the Company has not yet adopted a portfolio-wide quantitative target for reducing material consumption or waste generation. Instead, circular economy considerations are integrated qualitatively into development planning, modernization processes, and procurement decisions. Resource efficiency is therefore addressed through operational practices rather than through formally defined quantitative targets at this stage.

Looking forward, the Company plans to further strengthen monitoring and reporting mechanisms related to resource use. The medium-term roadmap for the period 2025–2027 includes several planned improvements:

- increased monitoring of waste volumes generated at individual assets,
- structured reporting of recycled and recovered waste fractions,
- enhanced ESG screening of suppliers and contractors,
- expanded use of digital documentation systems

supporting resource efficiency.

As ESG data collection and monitoring systems continue to mature, DL Invest Group may consider the introduction of formal waste intensity indicators, such as waste generation per square meter (kg/m²), in order to further strengthen measurement of circular economy performance.

Through these initiatives, the Company aims to gradually transition toward a more structured circular resource management model aligned with ESRS E5 requirements.

E5-4 Resource Inflows – Material Use

DL Invest Group operates primarily as a real estate developer and long-term asset manager. As such, the inflow of material resources is associated mainly with construction activities, modernization projects, and the operational maintenance of buildings within the portfolio. Material inflows vary depending on the scale of development projects undertaken in a given year. The most significant categories of materials used within the Company's activities include:

- construction materials used during development and modernization projects,
- technical equipment and building installations,
- operational consumables required for facility management and maintenance.

Because construction activity can be resource-intensive, DL Invest Group seeks to incorporate resource efficiency considerations into the planning and execution of development projects. The Company applies a number of measures aimed at reducing material intensity and improving lifecycle efficiency.

Key practices include:

- design-stage efficiency planning aimed at optimizing material use,
- ESG screening of suppliers and contractors,
- reuse of selected materials during modernization projects where feasible,
- planning focused on long-term asset durability and lifecycle optimization.

These measures support the reduction of unnecessary material consumption and contribute to the broader circular economy framework applied within the Company's operations.

DL Invest Group does not conduct extraction or production of critical raw materials, and therefore its exposure to raw

material supply risks is limited primarily to construction supply chains.

E5-5 Resource Outflows – Waste

Waste generation within DL Invest Group’s activities arises primarily from operational building use, construction processes, and internal administrative activities. Although the overall waste profile varies depending on the scale of development projects in a given year, the Company applies structured waste management practices aimed at minimizing environmental impact.

Waste streams generated within the portfolio originate mainly from:

- tenant operational activities,
- construction and modernization projects,
- administrative and office-related processes.

To ensure responsible waste management, DL Invest Group has implemented portfolio-wide segregation and disposal procedures. In the reporting year 2024:

- structured waste segregation systems were implemented across the portfolio,
- no material environmental penalties related to waste mismanagement were reported,
- all properties remained in compliance with municipal waste management systems and local regulations.

Generation of hazardous waste within the Company’s operations remains limited. Where such waste occurs, it is handled by certified external entities in accordance with applicable environmental and safety regulations.

Through these measures, DL Invest Group aims to ensure responsible waste management and compliance with environmental standards while gradually improving circular resource use practices.

E5-6 Anticipated Financial Effects of Circular Economy Transition

The transition toward a more circular economic model

may create both risks and opportunities for the real estate sector. DL Invest Group monitors these developments as part of its broader sustainability risk management and strategic planning processes.

Potential risks related to circular economy regulations and resource management include:

- tightening EU circular economy regulations,
- introduction or expansion of extended producer responsibility schemes,
- volatility in construction material costs,
- increasing landfill and waste disposal costs.

At the same time, the integration of circular economy practices may generate several potential opportunities for the Company, including:

- reduction of operational waste handling costs,
- improved attractiveness of properties for sustainability-focused tenants,
- enhanced access to ESG-linked financing instruments,
- potential increase in asset value associated with sustainable building certifications.

By incorporating circular economy considerations into development planning and operational management, DL Invest Group aims to strengthen both environmental performance and long-term economic resilience.

Strategic Circular Economy Outlook (2025–2027)

Looking ahead, DL Invest Group intends to further strengthen its circular economy framework by improving monitoring capabilities and expanding resource efficiency initiatives across its portfolio.

Key priorities for the period 2025–2027 include:

- formalization of waste intensity indicators (KPIs),
- increased integration of recycled construction materials,
- enhanced monitoring of construction waste streams,



- further digitalization of administrative processes reducing resource use,
- expansion of the ESG assessment framework for suppliers and contractors.

Through these initiatives, DL Invest Group aims to move beyond basic regulatory compliance and gradually transition toward a more structured system of lifecycle-based resource governance aligned with ESRS E5 requirements.

ESRS S1 – Own Workforce

S1-1 Policies Related to Own Workforce

DL Invest Group recognizes its workforce as a key factor supporting operational efficiency, long-term organizational resilience, and the successful implementation of sustainability initiatives. The Company considers responsible workforce management an essential component of its ESG framework and corporate governance structure.

Workforce governance is supported by a number of internal policies and procedures designed to ensure fair working conditions, respect for human rights, and safe working environments.

The main policies governing workforce-related matters include:

- Human Rights and Labor Standards Policy,
- Code of Ethics,
- Conduct Code,
- Anti-Discrimination Policy,
- Anti-Corruption Policy,
- Occupational Health and Safety (OHS) Procedures,
- Internal Employee Management Regulations,
- Whistleblowing Policy.

All workforce-related policies are aligned with applicable legal and international standards, including:

- Polish labor law,
- principles established by the International Labour

Organization (ILO),

- relevant European Union labor and non-discrimination regulations.

DL Invest Group maintains a zero-tolerance approach toward violations of fundamental labor and human rights standards. In particular, the Company does not tolerate:

- forced labor,
- child labor,
- discrimination in employment practices,
- harassment or workplace misconduct,
- retaliation against individuals reporting concerns through whistleblowing channels.

Through these policies and governance mechanisms, DL Invest Group aims to foster a professional, inclusive, and safe working environment while ensuring compliance with applicable labor standards and ethical principles.

S1-2 Processes for Engaging with Own Workforce

DL Invest Group recognizes that effective engagement with employees is an essential element of responsible workforce management and organizational development. Open communication, access to information, and the possibility to raise concerns contribute to building a transparent and supportive working environment.

In 2024, the Company maintained several internal mechanisms designed to facilitate employee engagement, professional development, and internal communication. These mechanisms enable employees to actively participate in organizational processes and support the development of a collaborative workplace culture. Employee engagement mechanisms implemented during the reporting year included:

- structured onboarding programs supporting the integration of new employees into the organization,
- internal communication platforms facilitating information exchange,
- mentorship programs supporting knowledge



sharing and professional development,

- the Development Academy training framework,
- internal ESG awareness initiatives,
- grievance and reporting channels enabling employees to raise concerns.

Employees may communicate concerns or suggestions through several available channels, including:

- direct communication with the HR Department,
- confidential whistleblowing channels,
- anonymous reporting mechanisms where appropriate.

All reports are handled under structured internal procedures designed to ensure confidentiality, impartial assessment, and protection against retaliation. These processes support transparent dialogue within the organization and strengthen employee trust in internal governance mechanisms.

S1-3 Processes to Remediate Negative Impacts

DL Invest Group maintains structured procedures for identifying and addressing potential negative impacts related to workforce management. These procedures are designed to ensure that any concerns or reported incidents are addressed promptly and in accordance with internal policies and applicable legal standards.

The Company's internal framework includes:

- formal grievance procedures,
- mechanisms for investigating reported incidents,
- internal compliance review processes supporting policy enforcement.

In cases where potential violations are reported, the following steps are typically undertaken:

- the HR Department conducts a confidential review of the reported matter,
- corrective actions are implemented where necessary,

- internal procedures or policies may be updated if systemic issues or organizational gaps are identified.

As of the reporting year 2024:

- no material violations of labor rights were reported,
- no significant labor-related legal proceedings were disclosed.

These procedures contribute to maintaining a fair and transparent working environment while ensuring compliance with internal standards and applicable labor regulations.

S1-4 Taking Action on Material Impacts

DL Invest Group undertakes a range of initiatives aimed at strengthening workforce development, ensuring safe working conditions, and promoting an inclusive organizational culture. These initiatives support the Company's broader ESG objectives and contribute to building long-term organizational resilience.

1. Employee Development and ESG Capacity Building

Continuous professional development plays an important role in strengthening organizational capabilities and supporting the implementation of sustainability initiatives. In 2024, workforce development activities focused on several key areas:

- education related to ESG and sustainability topics,
- development of digital transformation competencies,
- increasing regulatory awareness,
- leadership training programs,
- structured mentorship initiatives.

The DL Invest Group Development Academy serves as a platform supporting employee education and skill development. Its activities include:

- programs for continuous professional education,



- hybrid learning formats,
 - structured competency development pathways.
- Investments in workforce skills and ESG literacy enhance the Company's ability to implement sustainability initiatives while strengthening internal preparedness for evolving regulatory requirements.

2. Occupational Health and Safety (OHS)

Ensuring safe working conditions is a fundamental responsibility of the Company and an integral part of its workforce management framework. Occupational health and safety governance is supported by internal procedures aligned with national labor and safety regulations.

Key elements of the OHS management framework include:

- mandatory safety training for new employees,
- periodic workplace risk assessments,
- structured processes for hazard identification,
- incident reporting and response protocols,
- compliance with national occupational health and safety regulations.

Although the ISO 14001 environmental management system primarily addresses environmental risks, its risk-based approach also indirectly supports workplace safety by promoting structured risk identification and preventive management practices.

Based on available information, no major workplace accidents were reported in 2024.

3. Diversity, Equity and Inclusion (DEI)

DL Invest Group promotes a working environment based on respect, equal opportunity, and professional integrity. The Company's Anti-Discrimination Policy establishes principles aimed at preventing unequal treatment and promoting inclusive workplace practices.

Key commitments under this policy include:

- ensuring equal treatment in recruitment and promotion processes,

- prohibition of harassment or discriminatory behavior,
- structured procedures for handling complaints,
- guarantees of non-retaliation for individuals reporting concerns.

The Company recognizes that diversity and inclusion can contribute positively to organizational innovation, collaboration, and long-term resilience.

4. Employee Well-being

In addition to professional development and workplace safety initiatives, DL Invest Group promotes employee well-being and work-life balance through various organizational initiatives.

In 2024, these initiatives included:

- well-being workshops supporting employee health and work-life balance,
- team-building activities strengthening internal cooperation,
- programs supporting work-life balance,
- promotion of an open communication culture within the organization.

The Company's workplace culture emphasizes core values such as:

- dignity and respect,
- inclusion and equal opportunity,
- professional development,
- transparency in internal communication.

Through these initiatives, DL Invest Group seeks to foster a supportive working environment that contributes to both employee satisfaction and organizational effectiveness.

S1-5 Targets Related to Own Workforce

DL Invest Group continues to develop its workforce management framework in line with evolving ESG reporting requirements and organizational development priorities. As of the reporting year 2024, the Company



has not established formal quantitative targets related to workforce diversity or occupational injury rate reduction. Specifically:

- no formal numerical diversity targets have been disclosed,
- no specific injury-rate reduction targets have been formally defined.

Instead, the Company's workforce strategy focuses on qualitative improvement of organizational capabilities and governance structures. Key priorities include:

- strengthening employee competencies and professional development,
- improving internal ESG capacity and awareness,
- further formalization of workforce-related policies and procedures,
- ensuring regulatory readiness in the context of expanding ESG reporting requirements.

As internal data collection systems continue to develop, the Company may introduce more structured workforce indicators in the future. Potential developments for the period 2025–2027 may include:

- formal reporting of training hours per employee,
- development of OHS performance indicators.

These future initiatives aim to strengthen workforce transparency and support further alignment with ESRS S1 disclosure requirements.

S1-6 Characteristics of the Workforce

DL Invest Group employs a workforce that supports the Company's development, asset management, and operational activities across its real estate portfolio. The majority of employees are engaged in functions related to project development, property management, finance, legal services, and corporate administration.

Based on the information disclosed in the 2024 reporting

period:

- the workforce operates primarily in Poland, where the Company conducts its main business activities,
- employment relationships are established in accordance with national labor regulations,
- all employees are engaged under voluntary employment contracts,
- there is no reported use of forced or child labor within the Company's operations.

At the current stage of ESG reporting maturity, the Company has not disclosed detailed demographic workforce data in the 2024 report. In particular, the following breakdowns were not publicly reported:

- gender distribution,
- contract type structure,
- age structure of employees.

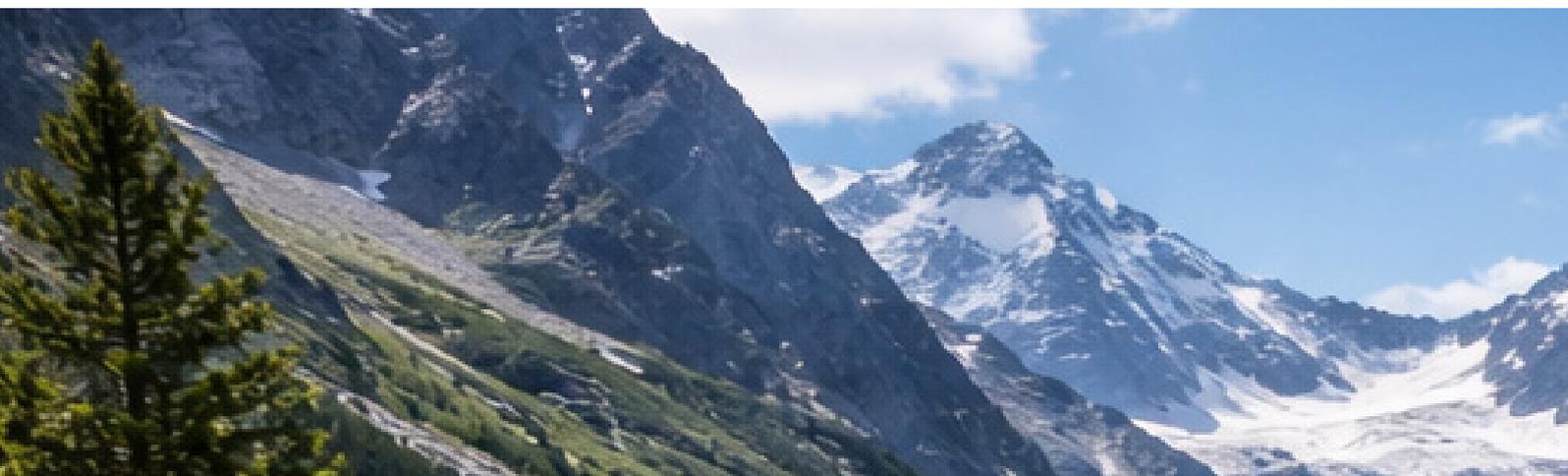
As ESG reporting processes continue to develop, future reports may include more detailed quantitative workforce data in order to ensure full alignment with ESRS S1 disclosure requirements and potential audit expectations.

S1-7 Working Conditions

DL Invest Group aims to provide working conditions that ensure safety, stability, and opportunities for professional development. Workplace standards are governed by a combination of legal requirements and internal corporate policies designed to promote fair and responsible employment practices.

Working conditions within the Company are supported by several governance mechanisms, including:

- compliance with Polish labor law,
- implementation of the Occupational Health and Safety (OHS) framework,
- structured HR communication channels,
- internal grievance and whistleblowing systems.



Employee remuneration and employment conditions are structured in accordance with applicable legal requirements. Compensation practices comply with:

- applicable wage regulations,
- statutory employment benefits and social security obligations.

The Company promotes working conditions that support long-term employment relationships and organizational stability. In particular, DL Invest Group emphasizes:

- stable employment arrangements,
- clearly defined professional development pathways,
- safe and compliant working environments,
- transparent and structured internal governance procedures.

These practices contribute to maintaining employee satisfaction and organizational continuity.

S1-8 Remuneration and Social Protection

Remuneration and social protection mechanisms within DL Invest Group are designed to ensure compliance with applicable legal requirements and provide employees with basic employment protections.

All employment relationships within the Company comply with:

- requirements of the Polish Labor Code,
- mandatory social security contribution systems,
- employment benefits, including healthcare and pension-related contributions.

Compensation structures currently focus on standard employment remuneration mechanisms and statutory protections. As of the reporting year 2024, the Company has not disclosed the use of variable remuneration schemes linked directly to ESG performance indicators.

Future integration of ESG-related incentives into

remuneration frameworks may be considered as part of the broader development of the Company's sustainability governance system.

S1-9 Health and Safety Metrics

Occupational health and safety is an important component of DL Invest Group's workforce management framework.

The Company applies preventive safety measures and structured procedures designed to reduce workplace risks and promote safe working conditions.

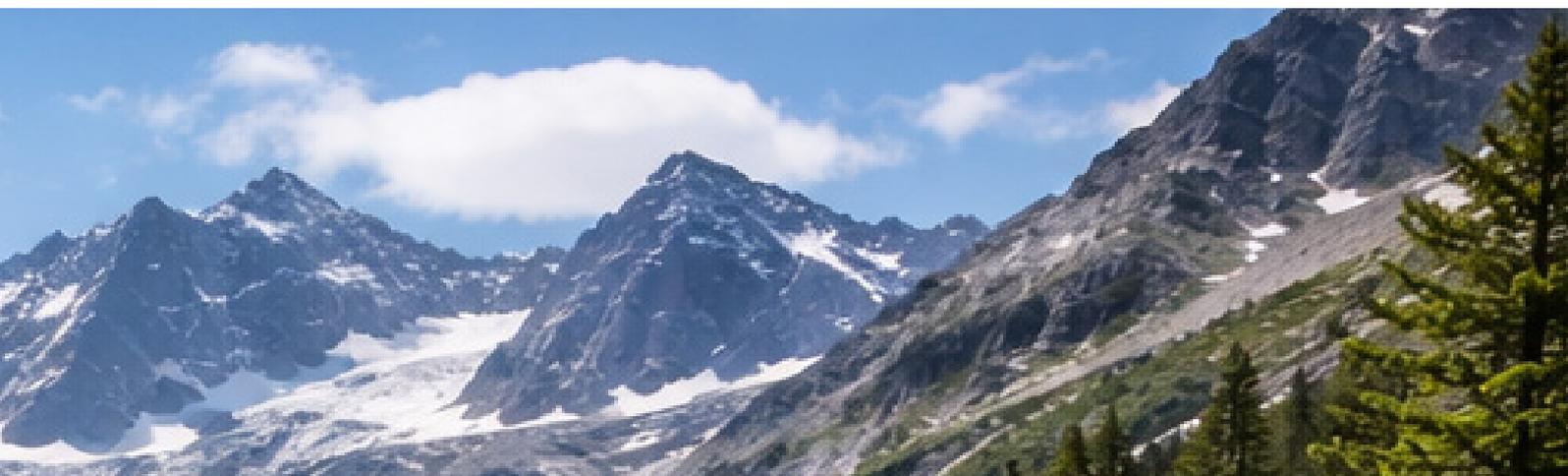
Based on the information disclosed for the reporting year 2024:

- no material workplace incidents were reported,
 - occupational health and safety training is mandatory for all new employees,
 - risk assessments are conducted periodically in order to identify and mitigate potential workplace hazards.
- Although safety monitoring mechanisms are in place, the 2024 report does not include quantitative indicators such as accident frequency rates or lost-time injury rates. As ESG data collection processes continue to develop, the Company may introduce more structured safety performance indicators in future reports to strengthen transparency and alignment with ESRS S1 disclosure practices.

S1-10 Work-Life Balance and Employee Representation

DL Invest Group supports a workplace culture that encourages open communication, collaboration, and a balanced approach to professional and personal responsibilities. Maintaining positive working relationships and supporting employee well-being are considered important elements of organizational stability.

To support employee engagement and workplace culture,



the Company promotes:

- structured internal communication channels,
- employee feedback mechanisms,
- well-being initiatives,
- team integration and collaboration programs.

These initiatives contribute to strengthening workplace relationships and supporting employee satisfaction.

Based on the disclosures available for 2024, the Company has not reported the presence of formal collective bargaining structures within the organization. Employee representation is therefore primarily supported through internal communication and engagement mechanisms.

Anticipated Financial Effects (Workforce-Related)

Workforce-related developments may create both risks and opportunities for DL Invest Group. As the labor market continues to evolve, companies operating in the real estate sector may face challenges related to workforce availability, wage dynamics, and regulatory compliance.

Potential risks include:

- tight labor market conditions,
- increasing wage pressure,
- regulatory risks associated with labor compliance,
- potential talent retention challenges.

To address these challenges, the Company applies several mitigation measures, including:

- implementation of internal training and development programs,
- maintenance of structured governance frameworks,
- adoption of transparent HR policies,
- promotion of a development-oriented organizational culture.

Maintaining workforce stability contributes to several important operational outcomes, including:

- continuity of operations,
- effective implementation of ESG initiatives,
- preservation of long-term asset management quality.

Strategic Workforce Outlook (2025–2027)

DL Invest Group plans to further strengthen its workforce management framework in line with evolving ESG reporting standards and organizational development priorities. In particular, the Company aims to improve the availability and transparency of workforce-related data.

Planned developments for the period 2025–2027 include:

- improved measurement of ESG-related training activities,
- strengthened data collection systems supporting CSRD reporting requirements,
- expansion of digital learning infrastructure,
- gradual integration of ESG performance indicators into governance structures.

Through these initiatives, workforce governance at DL Invest Group is gradually evolving from a primarily policy-based framework toward a more data-driven and measurable human capital management model aligned with ESRS standards.

ESRS S3 – Affected Communities

S3-1 Policies Related to Affected Communities

DL Invest Group recognizes that its activities as a real estate developer and long-term asset owner may influence local communities and urban environments. Development projects and operational assets may have impacts related to land use, infrastructure capacity, mobility patterns, and local economic activity.

Potential areas of interaction with local communities include:



- land use and urban planning considerations,
- infrastructure load,
- traffic intensity and mobility patterns,
- environmental footprint of developments,
- local employment creation and economic activity.

Community-related governance is embedded within several internal policies and operational frameworks, including:

- DL Green Strategy,
- Environmental Management System (ISO 14001:2015),
- Code of Ethics,
- Human Rights Policy,
- Construction and Development Standards,
- stakeholder engagement practices implemented during development projects.

The Company applies a preventive and impact-aware approach to project development and asset management.

This approach emphasizes:

- compliance with zoning and environmental regulations,
- community consultation processes during development planning,
- infrastructure planning adapted to local community needs,
- integration of biodiversity considerations into development projects.

Through these practices, DL Invest Group aims to ensure that its development activities are carried out responsibly while contributing positively to local economic and social environments.

S3-2 Processes for Engaging with Affected Communities

DL Invest Group recognizes that real estate development activities require constructive engagement with local

communities and public stakeholders. Transparent communication and early-stage consultation play an important role in ensuring that development projects are aligned with local needs, regulatory requirements, and environmental considerations.

Community engagement typically takes place during the development planning, permitting, and investment preparation stages. At these stages, the Company cooperates with local authorities and other stakeholders in order to identify potential concerns and ensure compliance with regulatory frameworks.

Engagement mechanisms include:

- participation in administrative and public consultation procedures,
- cooperation with local authorities and municipal administrations,
- preparation of environmental impact assessments where required,
- direct dialogue with municipal stakeholders,
- transparent communication throughout investment processes.

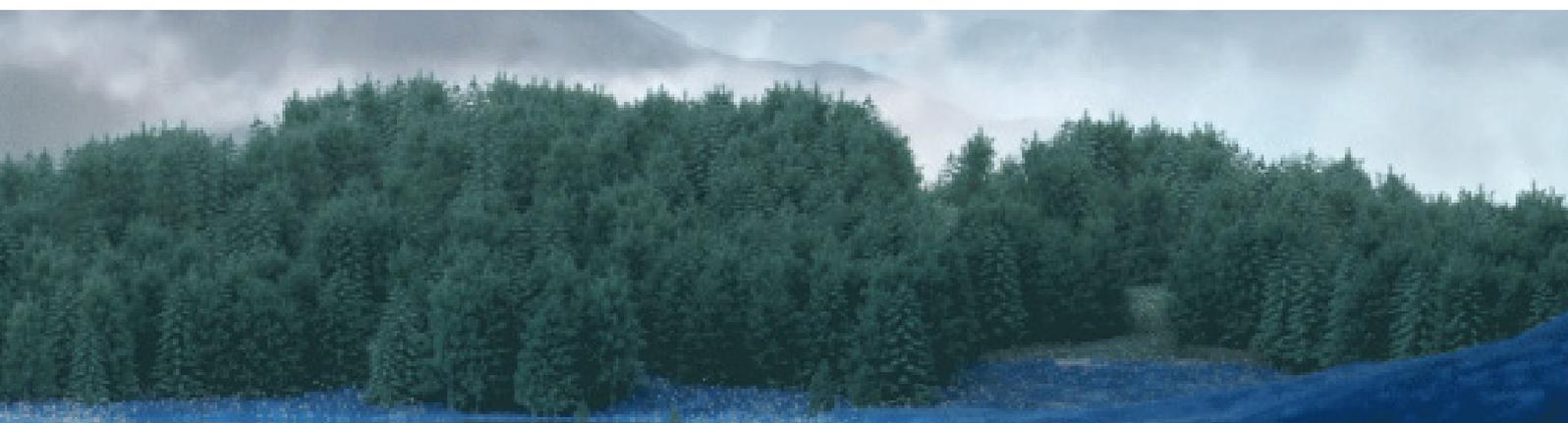
These engagement processes primarily focus on addressing matters such as:

- traffic management and infrastructure planning,
- mitigation of potential environmental impacts,
- compliance with local spatial development plans,
- identification and response to community concerns during project preparation.

Based on available disclosures, no significant community disputes were reported in 2024.

S3-3 Processes to Remediate Negative Impacts

DL Invest Group maintains structured procedures for addressing potential adverse impacts that may arise during development or operational activities. These procedures



are designed to ensure that community-related concerns are assessed and addressed in a timely and responsible manner.

If potential concerns are raised, the Company applies the following approach:

- project teams conduct an internal assessment of the reported issue,
- mitigation measures are implemented where necessary,
- design or operational adjustments may be introduced to reduce negative impacts,
- communication with relevant stakeholders is maintained throughout the process.

These procedures help ensure that potential issues are resolved through constructive dialogue and responsible project management.

According to the information disclosed for 2024:

- no material incidents involving forced displacement were reported,
- no land disputes were disclosed,
- no violations of community rights were identified.

S3-4 Taking Action on Material Impacts

DL Invest Group undertakes various actions designed to support responsible urban integration of its projects and to contribute positively to local communities. These actions address infrastructure planning, environmental integration, and local economic development.

1. Infrastructure and Urban Integration

Development projects are planned in a manner that supports compatibility with local urban infrastructure and mobility systems. Particular attention is given to minimizing disruption to surrounding communities and ensuring

efficient access to developed properties.

Projects are therefore designed to:

- integrate with existing local transport systems,
- reduce potential traffic congestion through appropriate access planning,
- provide adequate parking infrastructure,
- comply with municipal environmental and infrastructure standards.

2. Biodiversity and Green Infrastructure

DL Invest Group integrates green infrastructure and biodiversity-supporting solutions into selected development projects. These initiatives contribute both to environmental sustainability and to the quality of surrounding urban environments.

Examples of such measures include:

- planting trees and native vegetation,
- installation of insect hotels,
- creation of landscaped green areas,
- implementation of rainwater retention systems,
- adaptation of landscaping solutions to local ecological conditions.

These measures contribute to several positive environmental outcomes, including:

- stabilization of local microclimates,
- support for urban biodiversity,
- reduction of urban heat island effects.

3. Employment and Economic Contribution

DL Invest Group also contributes to local economies through its development activities and long-term asset management operations. New projects may generate employment opportunities and support local supply chains.



The Company contributes to regional economic activity through:

- job creation within developed properties,
- engagement of local contractors during construction,
- cooperation with regional suppliers,
- long-term property management operations supporting local service providers.

The Company's activities are limited to commercial real estate development and asset management. DL Invest Group does not operate in sectors associated with extractive activities or high social displacement risk.

S3-5 Targets Related to Affected Communities

DL Invest Group continues to develop its approach to community engagement and social impact management. As of the reporting year 2024, the Company has not introduced formal quantitative indicators measuring community impact.

Specifically:

- no quantitative community impact KPIs have been disclosed,
 - community engagement processes remain procedurally integrated within development governance.
- As ESG reporting processes continue to evolve, the Company plans to strengthen documentation and measurement of community-related activities. Planned developments for the period 2025–2027 include:
- formalization of stakeholder engagement documentation,
 - development of structured biodiversity-related performance indicators,
 - improved impact documentation aligned with

ESRS disclosure practices.

S3-6 Characteristics of Affected Communities

DL Invest Group conducts its operations primarily in Poland, where it develops and manages various types of commercial real estate assets.

The Company's projects are located mainly within:

- logistics parks,
- retail facilities,
- mixed-use developments.

Communities potentially affected by the Company's activities include:

- residents of neighboring municipalities,
- local businesses,
- municipal authorities,
- employees working within developed assets.

All projects are developed in accordance with approved zoning and spatial planning frameworks. The Company's development activities do not involve:

- forced resettlement of local populations,
- displacement of indigenous communities,
- development in high-conflict land use zones.

S3-7 Human Rights in the Value Chain

Respect for human rights is embedded within DL Invest Group's corporate governance and supplier management practices. The Company expects its contractors and suppliers to operate in accordance with applicable legal and ethical standards.

Human rights considerations are integrated within:

- the Code of Ethics,
- supplier requirements and procurement procedures,



- contractual compliance clauses applied to contractors and partners.

Suppliers and contractors cooperating with the Company are expected to comply with:

- national labor regulations,
- environmental protection standards,
- anti-corruption and ethical conduct requirements.

Based on available disclosures for 2024:

- no human rights violations were reported within the value chain,
- no material community-related litigation was disclosed.

S3-8 Anticipated Financial Effects

Community relations and stakeholder engagement may influence both project implementation timelines and long-term asset performance. For this reason, DL Invest Group considers community-related risks as part of its broader risk management framework.

Potential risks associated with community impacts include:

- project delays resulting from administrative or community objections,
- additional infrastructure upgrade costs,
- potential reputational risks linked to environmental impacts,
- tightening spatial planning and zoning regulations.

To mitigate these risks, the Company applies several preventive measures, including:

- early-stage stakeholder consultations,
- development of compliance-focused project designs,
- integration of environmental certification frameworks,
- implementation of structured ESG governance processes.

Constructive engagement with local communities supports

the Company's long-term operational stability. In particular, effective stakeholder dialogue contributes to:

- maintaining a social license to operate,
- strengthening regulatory compliance readiness,
- supporting long-term asset valuation stability.

Strategic Community Outlook (2025–2027)

DL Invest Group intends to further develop its community engagement and social impact management practices in line with evolving ESG reporting requirements. The Company aims to strengthen both documentation processes and measurement of community-related impacts.

Planned developments include:

- introduction of formal stakeholder engagement documentation procedures,
- improved measurement of biodiversity-related initiatives,
- enhanced integration of climate adaptation features in development planning,
- development of structured ESG risk mapping at the local level.

Through these initiatives, community governance within DL Invest Group is gradually evolving from a compliance-based approach toward a more structured system of social impact management aligned with ESRS S3 requirements.

G1-1 Corporate Culture and Business Conduct Policies

DL Invest Group operates within a structured corporate governance framework designed to ensure ethical conduct, regulatory compliance, and protection of long-term stakeholder value. The Company promotes a culture of integrity and accountability across all levels of the



organization, recognizing ethical business conduct as a fundamental component of sustainable corporate governance.

Business conduct governance is supported through a number of internal policies and procedures that define expected standards of behavior and compliance obligations. These frameworks establish clear guidelines for responsible decision-making and risk management.

Key governance policies include:

- Code of Ethics,
- Code of Conduct,
- Anti-Corruption Policy,
- Whistleblowing Policy,
- Internal Control Procedures,
- Supplier Compliance Requirements,
- Enterprise Risk Management Framework.

These policies apply across the organization and cover the following groups:

- Management Board,
- Supervisory Board,
- employees,
- contractors,
- key suppliers and business partners.

DL Invest Group maintains a strict zero-tolerance approach toward unethical or illegal conduct. In particular, the Company does not tolerate:

- corruption or bribery,
- fraudulent activities,
- conflicts of interest,
- retaliation against whistleblowers,
- anti-competitive behavior.

Through these policies and governance mechanisms, the Company aims to foster a culture of transparency and ethical responsibility that supports sustainable long-term value creation.

G1-2 Management of Relationships with Suppliers

DL Invest Group recognizes that responsible supply chain management is an important component of corporate governance and sustainability. The Company seeks to ensure that contractors and suppliers comply with applicable legal, environmental, and ethical standards. Supplier governance is implemented through several mechanisms integrated into procurement and contract management procedures. These mechanisms include:

- contractual compliance clauses,
- requirements related to environmental and legal compliance,
- health and safety standards,
- adherence to anti-corruption principles.

During development and construction activities, additional requirements are applied to contractors in order to support environmental and operational standards. In particular:

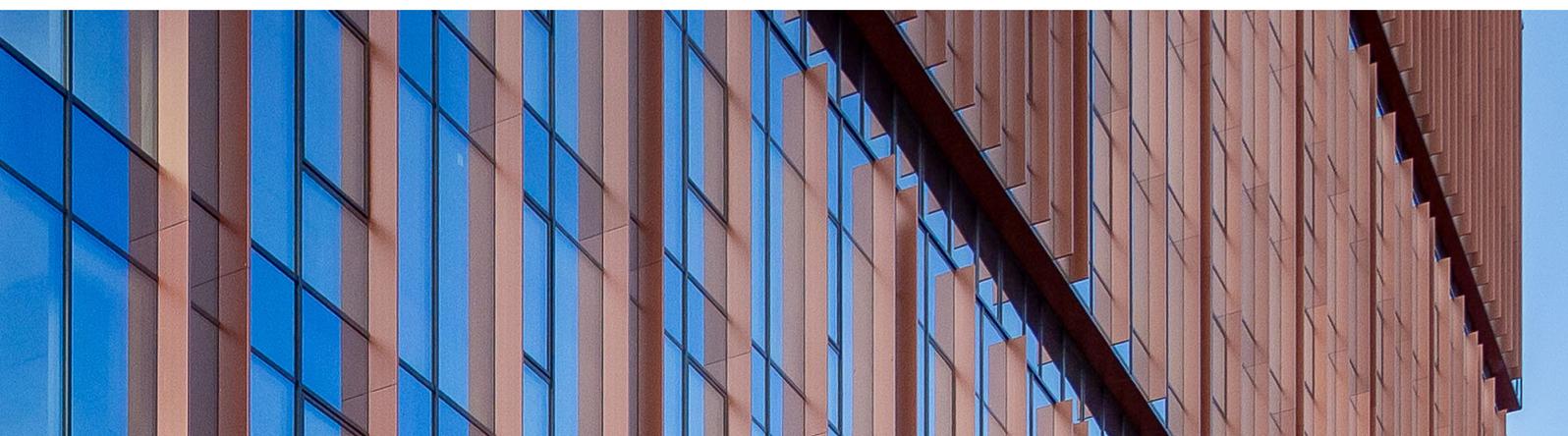
- contractors are required to comply with construction waste segregation standards,
- waste management documentation is monitored,
- ESG considerations are increasingly incorporated into procurement processes.

Looking ahead, the Company intends to further strengthen supplier governance processes. Planned developments for the period 2025–2027 include:

- development of a formal ESG supplier screening framework,
- structured documentation of ESG-related supplier criteria within procurement processes.

G1-3 Prevention and Detection of Corruption and Bribery

DL Invest Group maintains internal procedures designed to prevent and detect corruption, bribery, and other forms of



unethical conduct. These mechanisms are integrated into financial management processes and internal compliance systems.

Key anti-corruption safeguards include:

- internal approval procedures for financial transactions,
- segregation of duties within financial processes,
- documented procurement and contracting procedures,
- a whistleblowing channel enabling confidential reporting,
- periodic internal compliance reviews.

These measures aim to reduce the risk of improper conduct while strengthening financial transparency and accountability.

As of the reporting year 2024:

- no confirmed corruption cases were reported,
- no material legal proceedings related to bribery were disclosed,
- no financial penalties related to unethical conduct were recorded.

The Company also confirms that it does not disclose political donations, and its operations are conducted independently of political financing activities.

G1-4 Whistleblowing and Reporting Mechanisms

DL Invest Group maintains confidential reporting mechanisms that enable employees and other stakeholders to report potential violations of internal policies, legal requirements, or ethical standards.

The whistleblowing framework allows individuals to:

- submit concerns anonymously where appropriate,
- report ethical violations,
- report potential legal non-compliance,
- benefit from protection against retaliation.

Whistleblowing procedures are designed to ensure that all reported concerns are handled responsibly and confidentially. The process includes:

- confidential reporting channels,
- impartial internal review procedures,
- structured investigation processes,
- implementation of corrective actions where required.

Based on the information disclosed for 2024, no material whistleblower cases were reported.

G1-5 Political Engagement and Lobbying Activities

DL Invest Group conducts its business activities in accordance with applicable legal frameworks and does not engage in political sponsorship or political financing.

As of the reporting year 2024:

- the Company does not provide financial contributions to political parties,
- no direct political lobbying expenditures have been disclosed,
- interactions with public institutions occur exclusively through formal regulatory consultation processes.

The Company maintains a neutral approach toward political engagement and ensures that its business decisions remain independent from political interests.



G1-6 Payment Practices

DL Invest Group maintains structured financial management procedures designed to ensure transparency and compliance with contractual obligations. Payment practices are governed by internal financial control systems and contractual terms agreed with suppliers and contractors.

Key elements of the Company's payment governance include:

- structured payment approval procedures,
- adherence to contractual payment terms,
- financial control systems monitored by management oversight.

Based on available disclosures for 2024, no significant disputes related to delayed payments were reported.

These practices support stable business relationships with suppliers and contribute to maintaining trust within the Company's value chain.

G1-7 Risk Management and Internal Control

DL Invest Group applies a structured enterprise risk management framework that integrates both financial and non-financial risks. This framework supports proactive identification and mitigation of risks that could affect operational stability or corporate reputation.

The risk management framework addresses several categories of governance-related risks, including:

- regulatory compliance risks,
- ESG transition risks,
- corruption exposure risks,
- financial control risks,
- reputational risks.

To mitigate these risks, the Company applies a range of internal control mechanisms, including:

- internal financial oversight procedures,
- environmental monitoring under the ISO 14001 management system,
- strategic oversight by senior management,
- structured documentation and reporting practices,
- digitalization of financial workflows, including electronic invoicing systems.

Internal governance and control systems are being

progressively strengthened in preparation for CSRD-aligned reporting and potential external assurance requirements.

G1-8 Data Protection and Information Security

DL Invest Group recognizes the importance of protecting confidential information and ensuring secure management of digital data. As the Company continues to implement digital transformation initiatives, information security and data protection remain important governance priorities.

Digital solutions implemented within the organization, such as the electronic invoicing workflow system, are supported by several control mechanisms, including:

- controlled access systems,
- internal IT governance procedures,
- compliance with applicable data protection regulations.

Based on the information disclosed for 2024, no material data breach incidents were reported.

G1-9 Anticipated Financial Effects

Governance-related developments, particularly those associated with regulatory requirements and supply chain transparency, may create certain risks and opportunities for the Company.

Potential governance-related risks include:

- tightening regulatory oversight under CSRD and EU Taxonomy frameworks,
- increasing anti-corruption enforcement,
- potential ESG-related liabilities within supply chains,
- reputational risks associated with governance failures.

To mitigate these risks, DL Invest Group applies a number of governance safeguards, including:

- structured compliance policies,
- an operational whistleblowing system,
- internal financial control mechanisms,
- progressive formalization of ESG governance structures.

Strong governance practices contribute positively to the Company's long-term stability. In particular, robust governance frameworks support:

- improved access to financing,
- increased investor confidence,
- enhanced long-term asset value stability.

Strategic Governance Outlook (2025–2027)

DL Invest Group plans to further strengthen its governance framework as ESG reporting requirements and regulatory expectations continue to evolve. The Company aims to improve transparency, strengthen internal controls, and integrate sustainability considerations more closely into corporate governance structures.

Planned developments for the period 2025–2027 include:

- further formalization of ESG oversight at Board level,
- enhanced documentation supporting CSRD assurance processes,
- implementation of a structured ESG supplier assessment model,
- continued digitalization of compliance and financial processes,
- potential integration of ESG-related KPIs into executive oversight frameworks.

Through these initiatives, DL Invest Group’s governance system is gradually evolving from a primarily compliance-based model toward a more integrated sustainability governance framework aligned with ESRS require

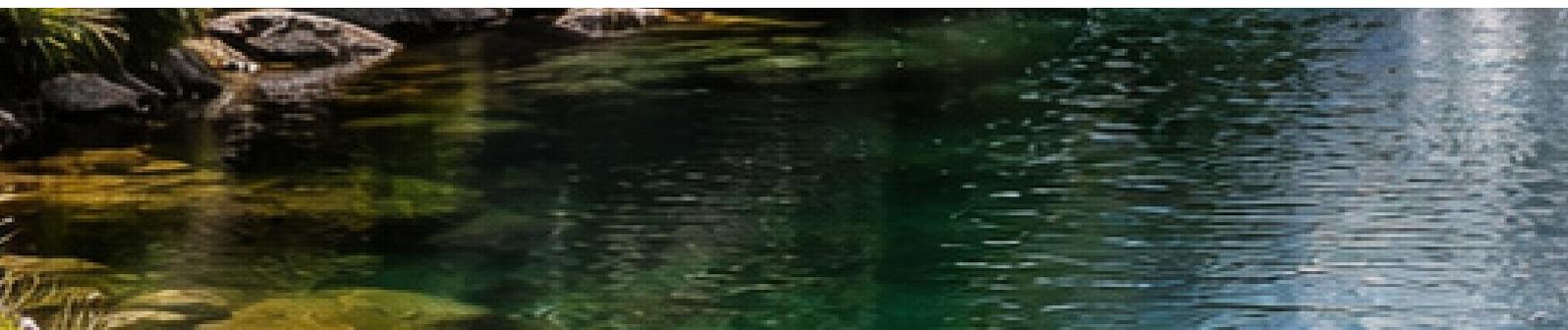
ANNEX A ESRS DISCLOSURE MAPPING TABLE

ESRS Standard	Disclosure Requirement (DR)	Section Reference in Report
ESRS 2	GOV-1 Governance structure	ESRS 2 – GOV-1 Governance Structure and Sustainability Oversight

ESRS 2	GOV-2 Information flow to governance bodies	ESRS 2 – GOV-2 Information Flow
ESRS 2	SBM-1 Business model	ESRS 2 – SBM-1 Business Model and Sustainability Integration
ESRS 2	SBM-3 Impacts, Risks and Opportunities (IRO)	ESRS 2 – SBM-3 Double Materiality
ESRS 2	SBM-4 Strategy and sustainability-related targets	ESRS 2 – SBM-4 Strategy and Targets
ESRS 2	IRO-1 Risk management process	ESRS 2 – IRO-1 Risk Management
ESRS 2	MT-1 Metrics and targets	ESRS 2 – MT-1 Metrics and Targets

Environmental

- | ESRS E1 | E1-1 Transition plan for climate change mitigation | ESRS E1 – Climate Transition Plan |
- | ESRS E1 | E1-2 Climate change policies | ESRS E1 – Climate Policies |
- | ESRS E1 | E1-3 Actions and resources | ESRS E1 – Climate Actions |
- | ESRS E1 | E1-4 Targets related to climate change | ESRS E1 – Climate Targets |
- | ESRS E1 | E1-5 Energy consumption and mix | ESRS E1 – Energy Consumption |
- | ESRS E1 | E1-6 Gross GHG emissions | ESRS E1 – Greenhouse Gas Emissions |
- | ESRS E1 | E1-7 GHG removals and carbon credits | ESRS E1 – Carbon Credits |
- | ESRS E1 | E1-8 Internal carbon pricing | ESRS E1 – Carbon Pricing |
- | ESRS E1 | E1-9 Anticipated financial effects | ESRS E1 – Climate Financial Effects |



- | ESRS E2 | E2-1 Pollution policies | ESRS E2 – Pollution Policies |
- | ESRS E2 | E2-2 Pollution actions | ESRS E2 – Pollution Actions |
- | ESRS E2 | E2-4 Air pollution | ESRS E2 – Air Emissions |
- | ESRS E2 | E2-5 Water and soil pollution | ESRS E2 – Water and Soil |
- | ESRS E2 | E2-7 Financial effects | ESRS E2 – Financial Effects |
- | ESRS E3 | E3-1 Water policies | ESRS E3 – Water Policies |
- | ESRS E3 | E3-2 Water actions | ESRS E3 – Water Actions |
- | ESRS E3 | E3-4 Water withdrawal and consumption | ESRS E3 – Water Consumption |
- | ESRS E3 | E3-5 Water-related risks and impacts | ESRS E3 – Water IRO |
- | ESRS E3 | E3-6 Financial effects | ESRS E3 – Financial Effects |
- | ESRS E5 | E5-1 Circular economy policies | ESRS E5 – Circular Economy Policies |
- | ESRS E5 | E5-2 Circular economy actions | ESRS E5 – Circular Economy Actions |
- | ESRS E5 | E5-4 Resource inflows | ESRS E5 – Material Use |
- | ESRS E5 | E5-5 Resource outflows (waste) | ESRS E5 – Waste |
- | ESRS E5 | E5-6 Financial effects | ESRS E5 – Circular Economy Financial Effects |

Social

- | ESRS S1 | S1-1 Workforce policies | ESRS S1 – Workforce Policies |
- | ESRS S1 | S1-4 Workforce actions | ESRS S1 – Workforce Actions |
- | ESRS S1 | S1-6 Workforce characteristics | ESRS S1 – Workforce Characteristics |
- | ESRS S1 | S1-9 Health and safety | ESRS S1 – Health and Safety |
- | ESRS S3 | S3-1 Policies related to affected communities | ESRS S3 – Community Policies |

- | ESRS S3 | S3-4 Actions related to affected communities | ESRS S3 – Community Actions |
- | ESRS S3 | S3-7 Human rights in value chain | ESRS S3 – Value Chain |

Governance

- | ESRS G1 | G1-1 Business conduct | ESRS G1 – Business Conduct |
- | ESRS G1 | G1-3 Corruption and bribery | ESRS G1 – Anti-Corruption |
- | ESRS G1 | G1-4 Whistleblowing | ESRS G1 – Whistleblowing |
- | ESRS G1 | G1-7 Risk management | ESRS G1 – Risk Management |

ANNEX B

KPI & METRICS TABLE (2024 Reporting Year)

Climate & Energy

KPI	2024	Unit	Target
Scope 1 emissions	1,457	tCO ₂ e	Net Zero 2040
Scope 2 emissions	26,143	tCO ₂ e	Net Zero 2040
Scope 3 emissions (waste)	350	tCO ₂ e	Monitoring expansion
Total GHG emissions	27,950	tCO ₂ e	Reduction pathway
Electricity consumption	36,109,528.54	kWh	Intensity reduction
Electricity intensity	108.90	kWh/m ²	Downward trend
Natural gas consumption	632,403.91	m ³	Gradual reduction
Gas intensity	3.59	m ³ /m ²	Downward trend



Water

KPI	2024	Unit	Target
Total water consumption	9,047.56	m ³	Efficiency improvement
Water intensity	0.27	m ³ /m ²	119 litres/m ²

Waste

Quantitative waste data was not fully consolidated in the 2024 reporting cycle.

Structured waste monitoring and reporting systems are planned for implementation during **2025–2026**.

KPI	2024	Status
Forced labour cases	0	None reported
Corruption cases	0	None reported
Material whistleblower cases	0	None reported
Major workplace accidents	0	None reported

ANNEX C

METHODOLOGY ANNEX

1. Reporting Boundaries

This report covers:

- all operational properties owned and managed by DL Invest Group in Poland,
- 41 operational properties as of 31 December 2024,**
- activities under the **operational control approach**.

The scope excludes:

- tenant-controlled energy consumption where not contractually measured,
- upstream embodied carbon unless explicitly disclosed.

2. Reporting Period

Reporting period:

1 January 2024 – 31 December 2024

Comparative data for **2021–2023** is presented where available.

3. Emission Calculation Methodology

Greenhouse gas emissions were calculated based on:

- electricity consumption (kWh),
- natural gas consumption (m³),
- refrigerant leakage (kg).

Emission factors were derived from:

- national emission factors for Poland,
- IPCC Guidelines (latest available version),
- standard European emission coefficients.

Scope classification has been partially formalized in 2024 and will be further aligned with the **GHG Protocol** in future reporting cycles.

4. Key Assumptions

- all energy consumption is treated as operational energy,
- no carbon credits or offsetting mechanisms are applied,
- no material biogenic emissions were identified,
- refrigerant emissions are based on reported refill data.

5. Data Sources

Data used in the report was derived from:

- utility invoices,
- facility management systems,
- accounting records,
- contractor environmental reports,
- ISO 14001 documentation,
- internal ESG consolidation sheets.

6. Data Quality and Controls

Data quality procedures include:

- manual verification by the finance department,



- cross-checking against utility invoices,
- internal review prior to ESG consolidation,
- no external assurance conducted in 2024 unless otherwise indicated.

ANNEX D STATEMENT OF DOUBLE MATERIALITY PROCESS

In 2024, DL Invest Group conducted a preliminary **double materiality assessment** in preparation for alignment with the European Sustainability Reporting Standards (ESRS) under the Corporate Sustainability Reporting Directive (CSRD).

The purpose of the assessment was to identify environmental, social, and governance topics that are material both from the perspective of the Company's **impact on the environment and society (impact materiality) and from the perspective of financial risks and opportunities affecting the Company (financial materiality).**

Identification of ESG Topics

Potential ESG topics were identified based on:

- ESRS thematic standards,
- EU regulatory developments (including CSRD and EU Taxonomy),
- sustainability risks relevant to the real estate sector.

Impact Assessment (Inside-Out)

The Company evaluated environmental and social impacts arising from its operations. Key areas considered included:

- climate change and energy consumption,
- water use and resource management,
- pollution prevention,
- workforce governance,
- business conduct and compliance.

Financial Risk and Opportunity Assessment (Outside-In)

The assessment also considered sustainability-related risks and opportunities that may affect the Company's financial performance, including:

- climate transition risks,
- regulatory compliance exposure,
- energy price volatility,
- physical climate risks affecting assets.

Stakeholder Consideration

Stakeholder perspectives were considered through:

- internal management workshops,
- review of investor and regulatory expectations,
- analysis of sector ESG reporting practices.

The following topics were identified as material:

- climate change (ESRS E1),
- energy consumption and emissions,
- water use and resource management,
- pollution prevention,
- workforce governance,
- business conduct and compliance.

The results of the double materiality assessment informed the Company's:

- sustainability strategy,
- KPI monitoring framework,
- ESG risk management processes,
- reporting structure.

The methodology and documentation of the double materiality process will be further refined in **2025** to support enhanced ESRS alignment and potential external assurance.





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