



GHELAMCO

INTERNATIONAL REAL ESTATE INVESTOR & DEVELOPER

Green Bond Framework

September 2022

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INTRODUCTION



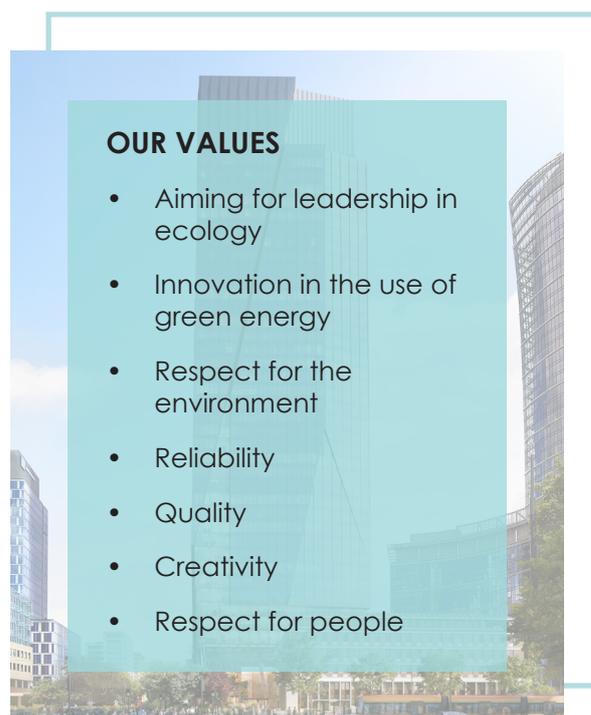
1.1. Our mission

ESG (Environmental, Social, Governance) is our priority. We put the ESG theory into practice because we care about the Planet.

As the largest office developer in Poland, a leader in the commercial real estate market in Poland and a pioneer in the field of innovation and creating public space, we strive to create modern buildings based on the goals and principles of sustainable development.

Our mission is to provide buildings of the highest quality. We focus on ecology, innovation and comfort for the users of our projects. Henceforth, our aim is to create urban space that enriches the lives of residents.

We achieve this by focusing on innovation.



1.2. About Ghelamco Group in Poland

Ghelamco Invest sp. z o.o. with its seat in Poland ("**Ghelamco Invest Poland**") is a subsidiary company belonging to the Ghelamco Group Comm VA Capital Group ("**Ghelamco Group**"), established as a company for the purposes of acquiring financing for the activity of the Ghelamco Group within the territory of Poland.

The entity from the Ghelamco Group, which is responsible for investment projects in Poland is Granbero Holdings Limited, a Cypriot company. As well as Ghelamco Invest Poland being responsible for financing Polish investment projects by the Ghelamco Group, Granbero Holdings Limited ("**Ghelamco Group in Poland**") also includes special purpose vehicles obtained or created for the needs of specific development investments.

The well-established position on the market has been cultivated for many years since the Ghelamco Group's establishment in 1985 and its expansion into the Polish market 31 years ago.

From the beginning of its activity in Poland until 30 September 2022, the Ghelamco Group in Poland constructed over 850 thousand square meters of modern office, residential, retail and warehouse space, and sold its projects for a combined value of over 2.8 billion EUR.

Ghelamco Group in Poland currently has over 135 thousand square meters of office and residential area under construction, over 44 thousand square meters of projects with binding building permits and over 375 thousand square meters under development.

The combined worth of assets as of 30 June 2022 was over 820 million Euro.

The Ghelamco Group is responsible for each phase of the property development process, from the purchase of land, development and construction, through its own gen-

eral construction company, to renting and selling. The Ghelamco Group is well placed to ensure compliance with the idea of a sustainable building throughout the whole process.

Four main areas of activity of the Ghelamco Group can be distinguished:

- | | |
|---|--|
| <div style="background-color: #00A09A; color: white; padding: 10px; display: flex; align-items: center; justify-content: center;"> 1 Investment Holding </div> | <p>comprising investments in development projects in Belgium, the UK (London), France and Poland with intra-group financing vehicles</p> |
| <div style="background-color: #00A09A; color: white; padding: 10px; display: flex; align-items: center; justify-content: center;"> 2 Development Holding </div> | <p>which includes Ghelamco Group companies providing construction, engineering and development services to the Investment Holding (and to an extent to third parties); securing services areas, engineering and development for the Ghelamco Group,</p> |
| <div style="background-color: #00A09A; color: white; padding: 10px; display: flex; align-items: center; justify-content: center;"> 3 Portfolio Holding </div> | <p>which groups other activities and real estate investments controlled by the ultimate beneficial owners,</p> |
| <div style="background-color: #00A09A; color: white; padding: 10px; display: flex; align-items: center; justify-content: center;"> 4 Ghelamco European Property Fund </div> | <p>established in 2016, it comprises real estate projects that are kept as income-generating products for a longer period, aiming at its value optimisation; the fund is not regulated but acts as a separate legal entity within the Ghelamco Group</p> |

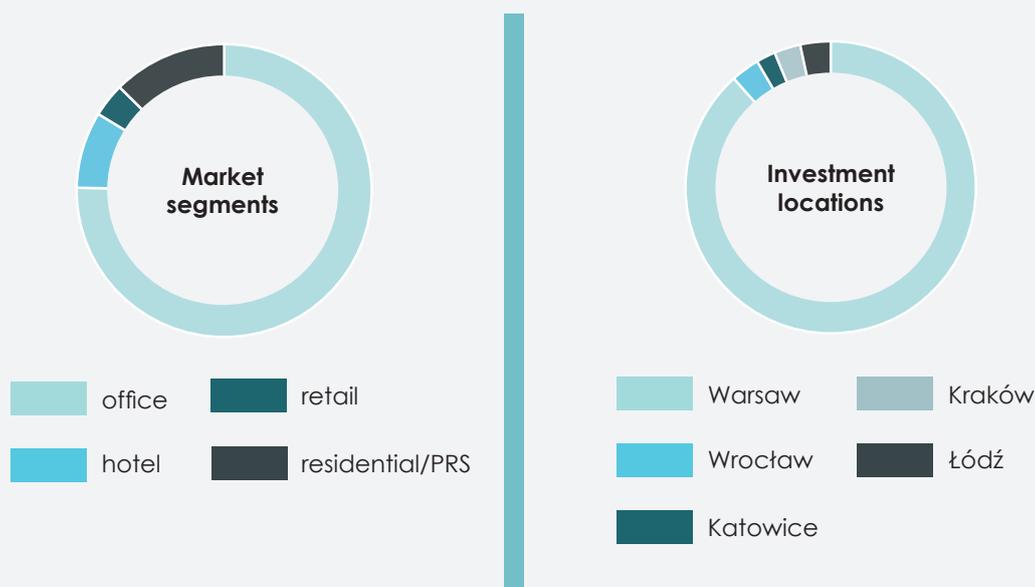
The Ghelamco Group is not only a European leader in the development and real estate sector with a focus on office space but also an enterprise combining a profitable business stemming from property development with sustainability in growth and operation, strategies of accomplishing which shall be explored in greater detail below.

The Ghelamco Group is a leading investor, property developer and general contractor within the European real estate industry and the largest office developer in Poland. Throughout its projects developed entirely by Ghelamco Group, many have received prestigious awards, for instance:

1. in **2017**, **MIPIM Award** for the "**Best Office & Business Development**" was awarded to the **Warsaw Spire** building;
2. in **2021**, **CTBUH** (The Council on Tall Buildings and Urban Habitat) "**Award of Excellence**" in the Interior Design category was granted to the **Warsaw HUB** complex (first project from CEE awarded in that category in the 20-year history of the award);
3. in **2021**, the **Europa Property 11th Annual CEE Investment** award for "**Best Future Project in CEE**" was granted to **The Bridge** building;
4. in **2022**, the "**Best High-Rise Development in CEE**" award was granted to the **Warsaw Unit** building.

Furthermore, the **Warsaw Hub**, **Warsaw Unit**, and **The Bridge** are expected to be the most modern office centres in Warsaw, encapsulating the idea of sustainable building. The Ghelamco Group's flagship projects also aim at limiting their carbon footprint through a number of means, from using sustainable building materials to choosing a location close to ample means of public transport in order to encourage ecological transportation methods.

As of 30 June 2022, the Ghelamco Group's portfolio in Poland has a value of EUR 821.5 million and consists of the following components:



Figures 1 & 2
composition of the Ghelamco Group's portfolio in Poland

1.3. Ghelamco Group in Poland and sustainability

Ghelamco Group is aware of the role it plays with regard to the environment and community life; hence it accordingly feels it is critical to create sustainable urban solutions focusing on the sustainability and energy efficiency of its buildings through innovation and by exceeding the applicable legal obligations. Our ambition is to be at the forefront in terms of durable, energy-neutral (BEN) real estate projects.

As for the Polish market, Ghelamco Group has a proven track record of developing sustainable and energy-efficient projects in line with international sustainability standards.

1. **In 2010**, the company developed the Trinity Park III office building, the **first building which was granted a BREEAM certificate in Poland**.
2. **Since 2011**, all office developments have been aligned with the **BREEAM Excellent**.
3. Ghelamco Group in Poland was appointed as a **Partner in the European Commission's "Green Building Programme"** for several projects in Poland. Examples of our BREEAM Excellent-certified projects are **The Warsaw HUB** (Warsaw), **Woloska 24** (Warsaw), **Warsaw Spire** (Warsaw) and **Wronia 31** (Warsaw) which was recognized

as the greenest building of CEE in the BREEAM Awards 2019 competition (**BREEAM Outstanding**).

4. **Since 2022** all developments have been aligned with the minimum **DGNB Gold and Well Gold** certification criteria.
5. **Warsaw UNIT** is the first project in Poland which will be certified with a **WELL v2 pilot (Platinum)** certificate confirming the highest quality of a building designed with the health, convenience, and comfort of employees in mind. The high level of comfort of Warsaw UNIT users is also confirmed by the fact that it is **the first high-rise building in CEE** with the **BREEAM** certificate at the **Outstanding Level**.
6. **The BRIDGE** (Warsaw) is the first office project in CEE with **SmartScore** and **Wired-Score** certificates, awarded to the most technologically advanced buildings in the world, with a rating at **Platinum Level**.

Our goal is for all our current and future projects to be certified to the highest possible level.

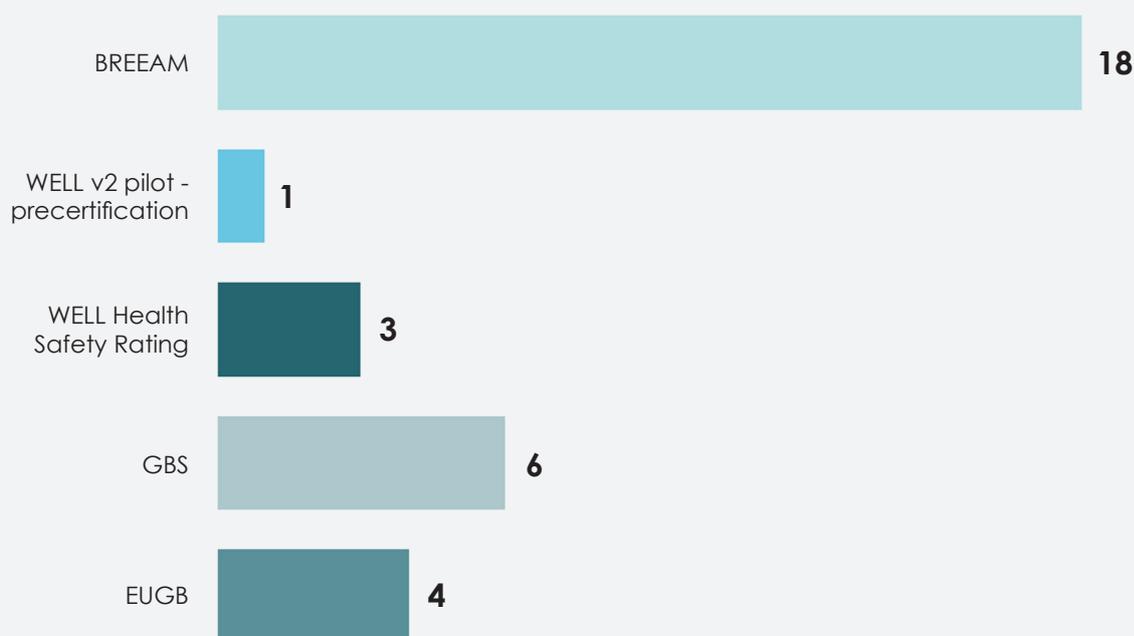


Figure 3

Number of certificates awarded to the Ghelamco Group's buildings in Poland since 2010 (in total as of 30 June 2022 - 32 certificates)

WE CARE ABOUT ESG

ENERGY CONSUMPTION MONITORING THROUGH BEMS

The BEMS (Building Energy Management Systems) system makes it possible to monitor energy in individual utilities, parts of installations, and tenant activities. Through such control it is possible to verify incorrect usage, taking into account time ranges and functions.

The data is collected and monitored by the Analyst Team, which issues recommendations for changes in the use of the systems in order to improve their efficiency and which may indicate potential areas requiring maintenance and repairs. Tenants will be able to implement solutions based on said recommendations, optimizing the usage of the rented office space (i.e. with 100,000 sensors installed, 40,000 in Warsaw Unit and 60,000 in Warsaw Hub developments, allowing adaptation of lighting and/or air-conditioning conditions) and leading to lower energy consumption. All future projects will be equipped with similar BEMS systems.

The building manager, together with the technical service, is responsible for the proper, energy-saving management of the facility.



SCIENCE BASED TARGETS INITIATIVE

Ghelamco Group also partakes in achieving global climate goals as part of the Science Based Targets initiative (SBTi) - a prestigious organization created, among others, by the UN Global Compact, WWF and the Carbon Disclosure Project.

The companies operating under the initiative aim to keep global warming below 1.5 or 2 degrees Celsius compared to the pre-industrial era, in line with the Paris Agreement signed by 196 countries associated with the United Nations.

Joining SBTi involves calculating an organization's carbon footprint, then reducing emissions, and finally achieving climate neutrality. These processes are in line with current scientific knowledge.

Our goal is that all our Projects achieve a 55% reduction in CO², the level expected by the EU in 2030 (we already have achieved that level for Warsaw UNIT project).

COMPLETELY ENERGY NEUTRAL IN 2025

Our goal is to reduce CO2 emissions by implementing renewable energy sources for our buildings (over 50% of the total emissions over the entire life cycle of the building).

Our key competitive advantage, thanks to the possession of renewable energy sources, is the ability to reduce CO2 emissions from the energy produced.

Our mission / goal is to make our Company and Projects energy neutral through wind and solar farms by 2025.



WE CREATE BUILDINGS ENSURING THE HIGHEST COMFORT OF USE

We design our buildings in such a way as to meet the high requirements of the quality of internal environment (IQE - Indoor Environmental Quality) and the high quality of indoor air (IAQ - Indoor Air Quality) as important indicators of comfort for users.

The Building Management System (BMS) ensures the ongoing maintenance of a high level of IQE and IAQ indicators in our buildings. The most important indicators of air quality and humidity are monitored on an ongoing basis, including the indicators of PM 2.5 and PM 10 dust and volatile organic compounds (VOCs).



We provide **well-being activities** in our buildings for the benefit of tenants:

- staircase architecture encouraging inter-story communication;
- tenants can take advantage of physical exercises carried out online and available to all building users weekly;
- stationary bicycles and adjustable desks and chairs;
- city bike stations located next to our buildings and amenities for cyclists (showers, lockers, stands);
- regular quarterly water quality tests from the municipal network to confirm compliance with stringent drinking water quality requirements;
- ongoing internal and external air quality surveys for city base stations.

We provide building users with **healthy, comfortable and safe working conditions** thanks to the following:

- energy-efficient lighting and motion sensors to control lighting in common areas;
- zone temperature control system in office space;
- effective and ecological ventilation and cooling systems;
- fan coil units - the applied solution, compared to the originally planned one, led to a reduction of CO² emissions by 11%, reducing energy consumption for cooling;
- air quality sensors installed in elevator halls.

We ensure accessibility amenities for people with disabilities. At the design stage of our buildings, the audit report for the Object Without Barriers certificate is prepared by the Integration Foundation (*Fundacja Integracja*). The certificate confirms the architectural accessibility of our buildings for people with limited abilities and provides that the surfaces of the buildings are attainable and adapted to the needs of people with various disabilities (e.g. people in wheelchairs, blind people, visually impaired or deaf people). The buildings are adapted to the needs of the elderly, people with reduced mobility or those traveling with young children.

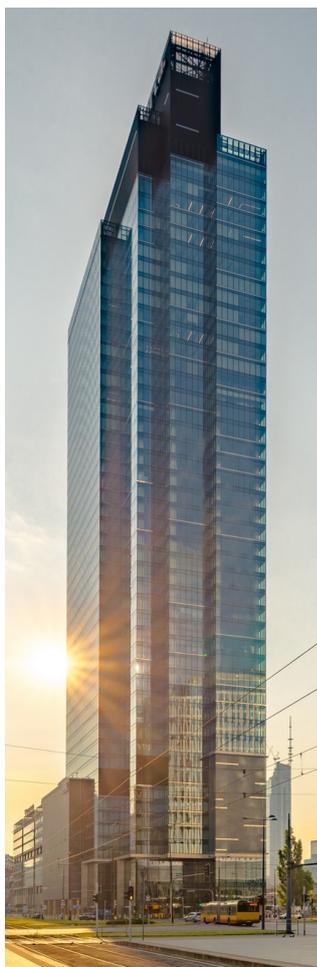
Implementation of the highest standards led to Plac Europejski (a public space created by Ghelamco Group in Poland for Warsaw Spire, Wronia 31 and The Bridge developments) receiving numerous awards - the best public space in Warsaw and the best public space providing access for people with disabilities.

CONSISTENT IMPROVEMENT FOR NEW PROJECTS

As a result of responsible design, the service charges in tower buildings are reduced by +/- 25%. We implement continuous innovation and new technical solutions.

CASE STUDY: WARSAW UNIT

[project completed in 2021, approx. 58.600 sqm, tower office project]



Energy neutrality:

Currently, Warsaw UNIT works on green energy, but from January 2023 it will be fully electrical energy neutral thanks to having its own photovoltaic farms ensuring 53% CO² reduction during the full life cycle of the project (including construction) and 70% of CO² reduction on an operational basis (excluding construction). Further CO² emission will be ca. 70% lower than CO² emissions benchmark applied by investment funds when acquiring office projects in Europe. Upon the connection of solar farms, Warsaw Unit will fulfil the CO² emission EU 2050 regulations.

Lower energy consumption:

40,000 sensors/control points automatically regulated by BEMS (Building Energy Management System) were installed in the building so as to optimize/reduce the energy consumption in the building. The data provided by these control points are automatically implemented by an analyst, which in turn leads to lower service charge costs compared to other buildings. Warsaw Unit already has 25% lower building energy consumption due to applied energy-saving solutions.

Health / Anti-pandemic system:

UV lamps in air handling units and elevators, the possibility of setting the humidity at 50% leading to 98.5% clean air free of viruses and bacteria.

Signal OS:

The building systems are integrated with the Signal OS operating system (our own building operational platform, monitoring, among others: HVAC system, elevators, access control, parking management system and air quality in the building).

Certificates:

The building was awarded the highest classifications on the most notable certificates:

- BREEAM International New Construction 2013 Office, Outstanding (the highest level of the certificate). This is the first certificate at this level for a high-rise building in Poland and the second in Warsaw;
- WELL v2 Core and Shell, pre-certification, Platinum (expected level);
- WELL Health and Safety Rating;
- Green Building Standard (GBS);
- Object Without Barriers ("Barrier-Free Building") - a certificate confirming that the building is adapted to the needs of people with disabilities.

CASE STUDY: THE BRIDGE (Warsaw)

[project under construction, approx. 48.000 sqm, expected delivery in Q1 2025, tower office building]

New technologies and solutions (further developments compared to Warsaw UNIT building):

- Activities reducing water consumption: application of the vacuum drainage system, the first in an office tower building in Europe and resulting in 75% water reduction;
- Water quality tests: done every 3 months (data shown in the application);
- Thermal comfort monitoring: local controllers monitored and managed by BMS, possible adjustment separately for each controller according to the requirements of the user;
- LED lights: in the whole building;
- Rainwater: reused for irrigation;
- Air quality monitoring: at all office levels (data shown in the application);
- Low emission concrete in the foundation slab - level of the reduction of CO² emissions: 136 kgCO²/m³ compared to reference concrete 327 kgCO²/m³ which brought 1 283 520 kg CO² of savings (equal to 6 flights of Dreamliner from Warsaw to Chicago, distance 7,500 km).

Energy neutrality:

Our mission and goal is to make our company and projects energy neutral via wind and solar farms by 2025.

Health:

Anti-pandemic solutions: UV lights in all elevators and AHUs preventing the spread of viruses and bacteria. Access to nature: Entrance through a pocket park and Plac Europejski.

Signal OS:

The building systems are integrated with the Signal OS operating system (our own building operational platform, monitoring, among others: HVAC system, elevators, access control, parking management system, air quality in the building).

Certificates:

The Bridge is designed to achieve: BREEAM (Outstanding), WELL (Platinum), WELL Health and Safety Rating, Green Building Standard and "Obiekt bez barier" (Barrier-Free Building), DGNB (Platinum) certificates.

The Bridge, as the first office project in Central and Eastern Europe, was already awarded the most notable certificates - SmartScore and Wired Score at the highest possible rating (Platinum level).

The SmartScore and WiredScore certificates are awarded to the most technologically advanced buildings in the World.

The SmartScore certification system is a new standard for evaluating smart office buildings to verify the extent to which modern buildings are smart and how they compare to other buildings. WiredScore platinum certification validates the building's digital connectivity and readiness for future technologies.



UN SUSTAINABLE DEVELOPMENT GOALS

As real estate is a key sector in the transition to a sustainable and low-carbon economy, Ghelamco Group is committed to contributing to the United Nations' Sustainable Development Goals (SDGs). Given its consistent and ongoing focus on developing sustainable and energy efficient projects which add value to local communities, Ghelamco Group contributes to the following SDGs:



Figure 4
Ghelamco Group SDG contribution

Ghelamco is also responsible for the social environment.

In its Sustainable Development Strategy, Ghelamco contributes to the implementation of UN Sustainable Development Goals, including goals in the field of community involvement: #3 Good Health and Well Being, #4 Quality Education, #5 Gender Equality, #11 Sustainable Cities and Communities, and #17 Partnerships for the Goals.

Ghelamco is aware of the huge impact of buildings both on the environment and on the people who use them. That is why we also want to shape the space around the buildings. Ghelamco aims to integrate its buildings with the urban space and to care for the quality of public space by introducing a number of functional and friendly solutions that can serve local communities. An example of such activities is Plac Europejski (European Square), built at the foot of the Warsaw Spire, Wronia 31 and The Bridge office buildings. Events on European Square: summer cinema, long night of museums and an ice rink.

During the design phase of our buildings, we requested an audit report for the "Building without Barriers" certificate. This certificate confirms the architectural accessibility of our buildings to people with reduced mobility; that means that the building surfaces are friendly and adapted to the needs of, among others, wheelchair users, the blind, the visually impaired, and the deaf.

Pro-social activities. Ghelamco provided vacant spaces to Ukrainian war refugees. Ghelamco Group has already helped more than 500 people, giving them accommodation, food, clothes and medical assistance.

To find more information about our Corporate Social Responsibility (CRS) activities, please visit [our website](#).



2

GHELAMCO INVEST POLAND GREEN BOND FRAMEWORK



Background of the Ghelamco Invest Poland Green Bond Framework

Ghelamco Invest Poland has developed its Green Bond Framework (“**the Framework**”) with the aim of attracting funding that will be allocated to sustainable and energy-efficient real estate projects in investment and development portfolio of Ghelamco Group in Poland. Under this Framework, Ghelamco Invest Poland can issue Green Bonds, the proceeds of which are exclusively allocated to Green Project Categories as described in the use of proceeds section.

The net proceeds of Green Bonds can be exclusively allocated to finance or re-finance (but not older than 36 months) in part or in full new and / or existing Eligible Green Projects as defined in this Framework. “Net proceeds” means all cash received by Ghelamco Invest Poland as a result of the issuance of Green Bonds, less customary costs and discounts of issuance paid by Ghelamco Invest Poland, as the case may be.

The Framework provides a clear and transparent set of criteria for Green Bonds issued by Ghelamco Invest Poland and is consistent with the guidelines of the Green Bond Principles (ICMA, 2021, with June 2022 appendix).

These voluntary process guidelines are developed in multi-stakeholder processes involving issuers, investors, financial institutions and NGOs, with a view to promoting the development and integrity of the sustainable finance market.

Under this Framework, the issuer of the Green Bonds will be Ghelamco Invest Poland. Ghelamco Invest Poland’s Green Bond Framework is intended to accommodate Polish law-governed bonds guaranteed by the suretyship granted by the parent entity of Ghelamco Invest Poland in EUR and/or PLN currencies. Further details will be provided in the applicable announcements and transaction documentation.

Ghelamco Invest Poland may further update or expand this Green Bond Framework to align with emerging market standards and best practices, such as the introduction of the EU Taxonomy of sustainable economic activities and the EU Green Bond Standard (“**EU GBS**”) or other relevant standards and guidelines.

Ghelamco Invest Poland Green Bond Framework follows the core components of the voluntary process guidelines of the Green Bond Principles (GBP) and includes the following sections:

1. Use of proceeds
2. Process of project evaluation and selection
3. Management of proceeds
4. Reporting
5. External review

2.1. Use of Proceeds

Ghelamco Invest Poland intends to use the net proceeds of Green Bonds issued under this Framework to finance or refinance, in whole or in part, sustainable and energy-efficient real estate projects ("**Eligible Projects**"). These Eligible Projects will be located in Poland.

The Eligible Projects are required to meet the eligibility criteria included in the table below. The Eligible Projects are also mapped to the UN Sustainable Development Goals (SDGs) and the EU Taxonomy of sustainable economic activities.

ICMA / LMA Eligible Project Category & SDG mapping	Eligibility Criteria	EU Taxonomy objective and economic activities
<p>Green buildings</p> <p>9.4 By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities</p> 	<p>A. development and construction of office buildings with the following certificates:</p> <ul style="list-style-type: none"> BREEAM, ≥ "Excellent" along with WELL ≥ "Gold" <p>or</p> <ul style="list-style-type: none"> LEED ≥ "Gold" along with WELL ≥ "Gold" <p>with</p> <ul style="list-style-type: none"> Green Building Standard with minimum 20% energy improvement over the reference buildings <p>and</p> <ul style="list-style-type: none"> DGNB ≥ "Gold" <p>B. development and construction of residential buildings/Private Rented Sector (PRS), or acquisitions of such buildings (or their parts) with the aim of their revitalization and redevelopment</p> <ul style="list-style-type: none"> residential buildings built after 31 December 2020 (considered to be new constructions), complying with the 10% reduction in Primary Energy Demand (PED) of the Nearly-Zero-Energy Building (NZEB) Standard in Poland, based on the Energy Performance of Buildings Directive (EBPD), implemented in Technical Condition 2021 (TC 2021) refurbished existing residential buildings with a reduction of the primary energy demand (PED) of at least 30% against the building's energy performance before the renovation refurbished existing buildings or renovations designed to fulfill the cost-optimal minimum energy performance requirements in accordance with the Energy Performance of Buildings Directive (EBPD) 	<p>EU Environmental objective:</p> <ul style="list-style-type: none"> Climate change mitigation. <p>Economic activities:</p> <ul style="list-style-type: none"> Construction of new buildings; Renovation of existing buildings; Acquisition and ownership of buildings.

ICMA / LMA Eligible Project Category & SDG mapping	Eligibility Criteria	EU Taxonomy objective and economic activities
	<ul style="list-style-type: none"> residential buildings complying with Technical Condition 2017 (TC 2017) or newer by year of construction are automatically eligible for qualification for green bonds where the mid-point of the bond term is no later than 2025, based on the Climate Bonds Initiative's (CBI's) low carbon buildings criteria in compliance with CBI's established residential market proxy for Poland; the required technical conditions are subject to change, based on the year of bond issuance and bond duration, and is mandatory to comply with the established 2050 zero-carbon linear trajectories for single-family or multi-family houses in compliance with the CBI's criteria for low carbon buildings residential buildings with an Energy Performance Certificate stating TC 2017 or newer, depending on the year of bond issuance and bond duration, based on the CBI's low carbon buildings criteria in compliance with the CBI's established residential market proxy for Poland refurbished existing residential buildings with an improved PED of at least 30%, based on data from EPC before and after the retrofit, depending on each bond term 	
<p>Renewable energy</p>  <p>7.2 By 2030, increase substantially the share of renewable energy in the global energy mix</p>	<p>The financing and/or refinancing of projects, investments, and expenditures for renewable energy production units, such as solar photovoltaic and offshore wind farms, installations, and/or equipment (target energy-neutral buildings).</p>	<p>Environmental objective:</p> <ul style="list-style-type: none"> Climate change mitigation.

2.2. Process for Project Evaluation and Selection

Ghelamco Invest Poland will follow a transparent process for the selection and evaluation of the Eligible Projects. Projects financed and/or refinanced through the Green Bonds issued under Ghelamco Invest Poland's Green Bond Framework are evaluated and selected based on compliance with the Eligibility Criteria as set out in paragraph 2.1 Use of Proceeds. All potential Eligible Projects primarily comply with local environmental and social laws and regulations, including any applicable regulatory environmental and social requirements, as well as Ghelamco Group's best practices. The Ghelamco Group has adopted a Code of Good Market Practices, which sets the rules and values of great importance for the Ghelamco Group companies. Ghelamco Group envisages the natural environment as a key element which should be taken into consideration when making business decisions. As part of its intra-group initiatives and initiatives addressed to its partners, Ghelamco Group endeavors to promote pro-environmental attitudes as well as any conscious, sustainable and lawful use of natural resources.

Projects financed and/or refinanced using proceeds from Green Bonds will be evaluated and selected by a dedicated Sustainable Finance Committee in accordance with the Use of Proceeds criteria as set out in paragraph 2.1 above. The Sustainable Finance Committee is composed of 4 members: Chief Risk Officer who heads the Committee and 3 members who hold senior managerial positions in the Technical, Development and Financial departments, one from each department. The Sustainable Finance Committee reports directly to the management board of Ghelamco Invest Poland. Meetings of the Committee are called on an as-needed basis, but not less than twice a year. The Committee votes unanimously.

The selection process for the Eligible Projects will also include internal or external analyses of the list of projects from selected areas and a review process of every project (acceptance or rejection based on expert assessment of the social and environmental impact), as well as reporting expenditures related to selected projects from the financial system.

If a specific project is divested, discontinued, or no longer meets the definition of Eligible Projects as set out in paragraph 2.1 Use of Proceeds, it will be removed from the portfolio of Eligible Projects. In such a scenario, Ghelamco Invest Poland will strive to replace the project with another Eligible Project as soon as reasonably possible. Ghelamco Invest Poland aims to ensure that the total volume of issued Green Bonds does not exceed the value of its portfolio of Eligible Projects.

The Sustainable Finance Committee will be responsible for:

- the review and validation of the Eligible Projects portfolio based on the defined Eligibility Criteria as set out in paragraph 2.1 Use of Proceeds;
- monitoring the Eligible Projects portfolio, throughout the duration of the transaction. Specifically, during the life of each Green Bond, the committee can decide to replace some Eligible Projects if an Eligible Project no longer meets the eligibility criteria;
- any future updates of the Framework.

2.3. Management of Proceeds

Ghelamco Invest Poland will manage the net proceeds of each tranche of issued Green Bonds to be credited to a sub-account.

In order to ensure transparency and the ability to track the utilization of net proceeds from each bond issue, Ghelamco Invest Poland has implemented and uses IT systems (such as internal information and accounting systems) and technical solutions enabling the separation of net proceeds from the conducted issues from other funds of Ghelamco Invest Poland, including separate bank accounts created for each individual issue of bonds, to which the net proceeds are transferred and spent.

Moreover, Ghelamco Invest Poland introduced a system of cyclical, quarterly reporting on the use of the net proceeds from an issue. Quarterly reports are made available to the public, including by publishing them on Ghelamco Invest Poland's website, and they make it possible to track and verify the utilization of net proceeds from each

issue separately. Ghelamco Invest Poland is obliged to prepare and publish quarterly reports not only due to the internal financial policies, but also due to the terms and conditions of individual issues (failure to publish the report is a violation of the terms of the bond issue).

The Issuer intends to apply the above solutions also in relation to net proceeds from the issue of Green Bonds.

As long as the Green Bonds under this Framework are outstanding, **Ghelamco Invest Poland** aims to allocate an amount equivalent to the net proceeds of these instruments towards the Eligible Projects, as defined in paragraph 2.1. Use of Proceeds.

The Ghelamco Invest Poland's Sustainable Finance Committee will be responsible for overseeing the management of proceeds until the full allocation of the net proceeds of Green Bonds issued under this Framework.

Given the inherent nature of Ghelamco Invest Poland's business model, the control and ownership of the Eligible Projects may be transferred to the acquirer at completion. These Eligible Projects will be removed from the portfolio when control is transferred to the acquirer.

Pending the full allocation of the net proceeds of issued Green Bonds to the portfolio of Eligible Projects, Ghelamco Invest Poland will manage the unallocated proceeds in cash or cash equivalents in line with its regular treasury policy.

The allocation of the net proceeds of issued Green Bonds to the Eligible Projects will be subject to at least an annual review and approved by the Ghelamco Invest Poland's Sustainable Finance Committee until the full allocation of the net proceeds of the issued Green Bonds.

2.4. Reporting

2.4.1. Allocation of proceeds reporting

On an annual basis, until full allocation, **Ghelamco Invest Poland** will report to investors on the allocation of the net proceeds of issued Green Bonds to its portfolio of Eligible Projects. The report includes the following information:

- an overview of the Green Bonds issued under the Framework and the total amount outstanding (in PLN and in EUR) of issued Green Bonds;
- the allocation of the net proceeds of issued Green Bonds to a portfolio of Eligible Projects, including information on the composition of the portfolio of Eligible Projects;
- a breakdown of the allocation of proceeds in terms of new financing and refinancing (i.e. share of allocation to projects under construction and share of allocation to existing projects);
- the amount of unallocated proceeds, if any.

2.4.2. Impact reporting

On an annual basis, Ghelamco Invest Poland intends to report on the social and environmental credentials of the portfolio of Eligible Projects to which the net proceeds of issued Green Bonds have been allocated.

The impact reporting will include:

- an overview of the Eligible Projects and their social and environmental classification (i.e. BREEAM, along with WELL, NZEB, LEED, DGNB, HQE , and/or EBPD / EPC), including the specific classification level where applicable (e.g. "Excellent");
- selected case studies of Eligible Projects;
- depending on data availability, additional impact indicators which may include:
 - energy consumption reduction (on a year-to-year basis) and the expected annual generation of renewable energy (in kWh);
 - CO2 emission avoidance;
 - a description and the number of well-being, energy consumption and pollution reduction amenities (city bike stations, photovoltaic farms, rainwater reuse systems and others) installed.

Additional impact indicators will be provided, where possible, for individual Eligible Projects. In other cases, they will be provided on a portfolio basis.

The allocation- and impact reporting will be made publicly available on the **Investor Relations Poland** section of the [Ghelamco corporate website](#).

2.5. External review

2.5.1. Second Party Opinion

Prior to the inaugural issuance under this Framework, Ghelamco Invest Poland commissioned Sustainalytics to provide a Second Party Opinion for its Green Bond Framework. Sustainalytics reviewed Ghelamco Invest Poland's Green Bond Framework and issued a Second Party Opinion, which concluded that the Framework is credible and impactful and aligns with the four core components of the Green Bond Principles 2021.

The Second Party Opinion is available on the **Investor Relations Poland** section of the [Ghelamco corporate website](#).

2.5.2. Independent verification

Ghelamco Invest Poland will appoint an independent verifier to provide a post-issuance review addressing the allocation of the net proceeds of issued Green Bonds on an annual basis until full allocation, or in case of significant changes in the allocation of proceeds.

DISCLAIMER

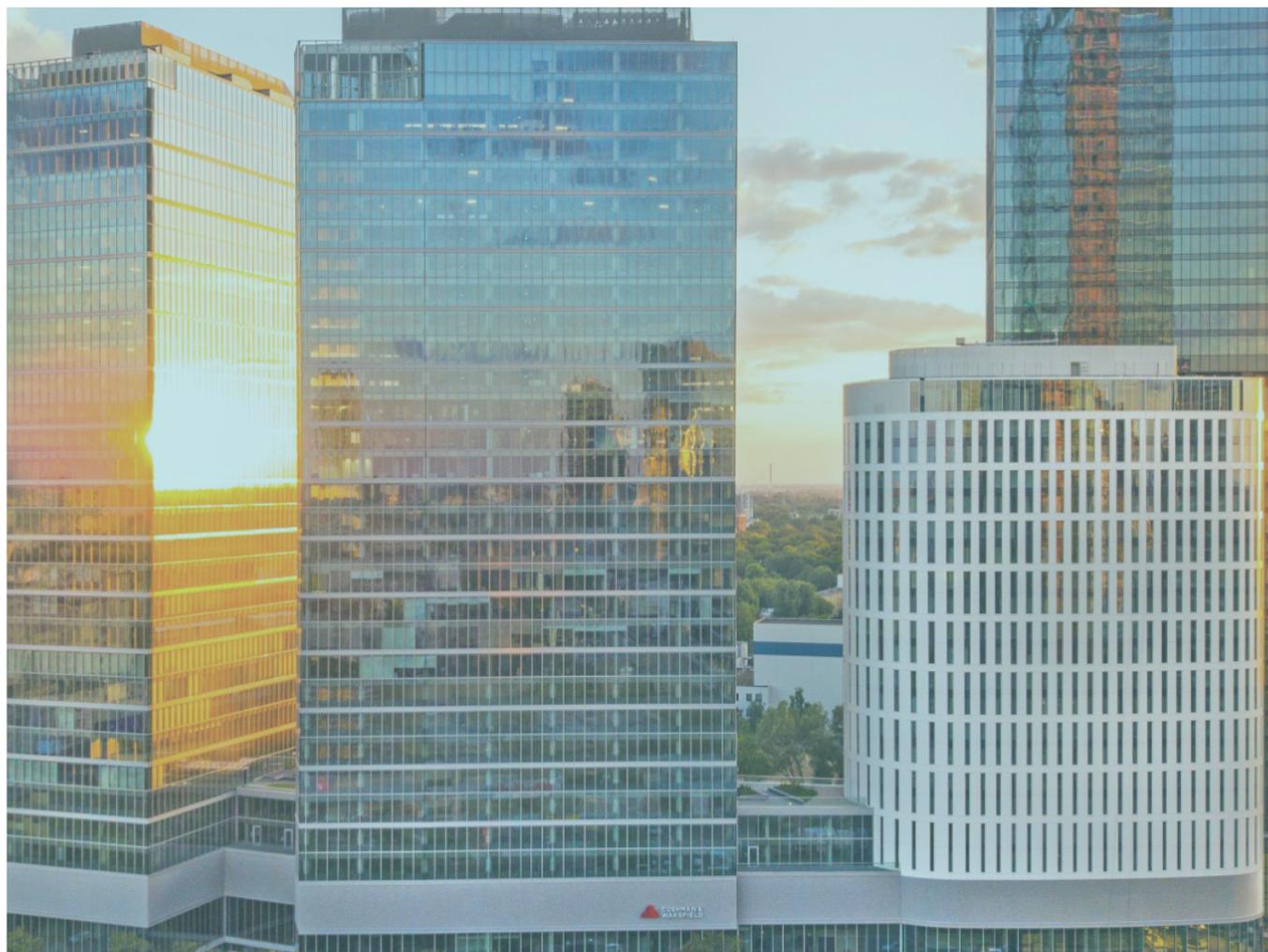
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In addition, it should be noted that not all of the expected benefits of the Eligible Projects as described in this Framework may be achieved. Factors including (but not limited to) market, political and economic conditions, changes in government policy (whether with continuity of the government or related to a change in the composition of the government), changes in laws, rules or regulations, the lack of available Eligible Projects being initiated, failure to complete or implement projects and other challenges, could limit the ability to achieve some or all of the expected benefits of these initiatives, including the funding and completion of Eligible Projects. Each environmentally focused potential investor should be aware that the Eligible Projects may not deliver the environmental or sustainability benefits anticipated, and may result in adverse impacts.

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