Sustainability Policy

Pontos Group

Approved by Pontos Oy Board
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Pontos Group Sustainability Policy

1. Purpose

At Pontos Group, we place a high priority on socially, ecologically and financially sustainable investments, operations and partnerships. We recognize that sustainable practices are vital for the environment and the wellbeing of communities but also contribute to the long-term value creation which is at the core of our business.

Pontos commits to:

- Making investments that meet our sustainability criteria set forth in our investment strategy and developing our existing portfolio companies according to our sustainability principles.
- Slowing down climate change by reducing greenhouse gas (GHG) emissions and energy consumption.
- Conducting business in a manner that delivers lasting social value and respects human rights.
- Exercising good governance in our own operations and our portfolio companies where we participate in board work and advise the management.

2. Environmental Responsibility

As a real estate and private equity investor focused on sustainable cities, Pontos bears great responsibility for reducing the environmental effects of properties and companies Pontos invests in. This is why we are committed to slowing down climate change by reducing GHG emissions and energy consumption, focusing on emissions generated by the real estate we own directly, through our portfolio companies and our investment portfolio more broadly. As biodiversity loss is a serious global challenge - and a direct consequence of the increasing built environment, biodiversity is also included in the Pontos focus areas.

Reducing GHG Emissions

Pontos calculates GHG emissions (scopes 1—3) for its entire investment portfolio and group operations. As our portfolio varies year by year, which heavily impacts the results, we focus on ensuring that each portfolio company crafts its own roadmap to reduce emissions through specific emission reduction actions (ERAs). Pontos strives actively towards carbon neutrality of its real estate portfolio, aiming at reducing emissions each year.

Reducing Energy Usage

Pontos measures the energy consumption of its entire investment portfolio and group operations. We have a climate roadmap which sets specific targets regarding reduction of energy usage for our portfolio companies. We encourage all of our portfolio companies to utilize renewable energy wherever possible. We also track the origin of energy for our group operations and portfolio companies.

Biodiversity and Nature Footprint

Real estate and construction activities are significant drivers of biodiversity loss, and understanding the biodiversity actions of its portfolio companies enables Pontos to mitigate the impacts of its portfolio to the ecosystem. Pontos measures how many of its portfolio companies have a biodiversity or nature footprint policy or defined actions to further biodiversity and reduce nature footprint. Receiving this information functions as a governance metric rather than a direct ecological performance indicator, but our intention is to activate our portfolio companies to analyze their own activity and define their own actions on biodiversity and nature footprint.

Responsible Construction Guidelines

To further our carbon neutrality and energy reduction targets, we have introduced the Pontos Group Responsible Construction Guidelines for new development and renovation projects in which we are involved. Following these guidelines, we ensure that all of our new construction and renovation projects adhere to stringent environmental standards, including those for energy efficiency, utilization of renewable energy, carbon footprint and circular economy, EU taxonomy, climate change adaptation, biodiversity and waste management — targeting green building certification of the construction as well as the operational phase.

3. Social Responsibility

We are committed to conducting business in a manner that delivers lasting social value and respects human rights. We draw our focus areas for social responsibility directly from our value of wellbeing.

Employee Engagement

When people are doing well, the company does better. This is why we at Pontos believe that we can only do good business if our people feel well and view their work as meaningful. Thus, we have set employee wellbeing as one of our primary group and portfolio company social responsibility focus areas. Pontos has a balanced company

culture which is supported by our annual wellbeing plan including recreational activities. We prioritize wellbeing of portfolio company employees and management by maintaining an active dialogue with our portfolio companies on the topic.

We regularly survey the wellbeing of our employees. As part of this survey, we measure the eNPS (employee Net Promoter Score) which is a metric commonly used to track employee satisfaction with and loyalty to the organization. We have set an internal target for the eNPS and encourage our portfolio companies also to measure it and to consider setting targets for their own eNPS.

Talent Development

Pontos is a knowledge-intensive, expert organization whose key resource is its individuals. The Pontos people strategy is guided by shared values and our belief in continuous development. We further the continuous development of our employees by regularly conducting a 360-degree feedback process and putting professional development plans in place for each of our employees.

To set tangible goals for the professional development of our individual employees, we have implemented, and encourage our portfolio companies to implement, a 360-degree feedback process. This process provides a well-rounded view of our employees' performance, strengths and areas for improvement. In our 360-degree process, everyone gets feedback not only from their supervisor and team members but also from the key external stakeholders they interface with, such as our portfolio companies.

Employees who have a professional development plan are often more engaged and satisfied with their jobs, leading to higher retention rates and better performance. We want to ensure that our employees are equipped with the latest industry knowledge, skills and practices, giving us an edge over our competitors. This is why each member of Pontos personnel has a professional development plan or defined development actions – and we encourage our portfolio companies to implement a similar practice for their employees.

Diversity, Equity and Inclusion

Diversity of thought drives results and innovation. We also believe that diversity of backgrounds, perspectives and experiences enriches our organization. Furthermore, diverse individuals cannot thrive in an environment that does not take into account their characteristics – this is where equity, providing fair processes and access to resources, plays a critical role. The sense of belonging that comes from the feeling of being welcomed and valued further ensures that everyone in the organization can thrive and reach their full potential. For these reasons, Pontos is committed to fostering

a diverse, equitable and inclusive workplace. We encourage all our portfolio companies, fund managers and asset managers to adopt a diversity, equity and inclusion policy.

4. Good Governance and High Business Ethics

As a real estate and private equity investor and an active owner, Pontos has a significant impact on and responsibility for exercising good governance in our portfolio companies where we participate in board work and advise the management. Our internal governance serves as a good baseline for the governance practices we recommend to our portfolio companies.

We have two primary sustainability focus areas in governance: (1) executive compensation linked to ESG metrics and (2) having a sustainability policy in place in the group and our portfolio companies. In addition to these areas, Pontos promotes good governance by actively engaging in structured sustainability dialogue across its portfolio through board-level oversight, regular management discussions and the integration of ESG topics into strategic planning and reporting processes. This approach ensures that sustainability considerations are embedded into decision-making driving long-term value creation rather than treated as a standalone compliance exercise.

Executive Compensation Linked to Sustainability Metrics

We view the actions of our own management and portfolio company executives as critical in driving our sustainability strategy. For this reason, we track the percentage of executives among (1) our own management team and (2) the management of our portfolio companies that have sustainability-linked incentive compensation.

Sustainability Policy in Place

Policies provide a framework for ethical decision-making and set clear expectations for behavior, fostering a positive work environment and culture. We encourage all our portfolio companies, fund managers and asset managers to have a sustainability policy in place, regardless of the size of their organization. This is important because a sustainability policy outlines the company's commitment to the environment, social responsibility and ethical governance, setting measurable goals and establishing mechanisms for monitoring and enforcement.

5. Measurement and Reporting

Sustainability metrics are tracked through a process whereby Pontos collects data both on its group operations and its portfolio companies regarding advancement of

sustainability KPIs. Advancement towards the group's sustainability objectives is covered in the Pontos Group annual review.

6. Accountability

We view transparency as a key driver of the sustainability strategy. We encourage everyone to propose improvement areas and report potential violations to the General Counsel, CFO or Chair of Pontos Oy. Violations can also be reported via the Pontos Group Whistleblowing Channel.

7. Monitoring and Review

This Sustainability Policy has been approved by the board of Pontos Oy. It will be reviewed periodically to ensure its effectiveness and relevance to the operations of Pontos Group. Any necessary revisions shall be made and submitted for approval to the board.