

ESG

ENVIRONMENTAL,
SOCIAL AND GOVERNANCE POLICY

WHITE STAR
REAL ESTATE

Introduction

White Star Real Estate (WSRE) is focused on providing quality real estate solutions for our development clients and management investors, from sourcing and developing real estate opportunities to implementing asset and property management solutions.

Within our strategy, WSRE is implementing its Environmental, Social, and Governance (ESG) Policy to further support sustainable development and environmental protection while reinforcing the company's commitment to our stakeholder communities and governance, across all our subsidiaries and affiliates.

This Policy document formalizes the company's long-standing commitments, objectives and responsibilities in sustainable business practices in the ESG area. Moreover, it will provide assistance to employees, tenants and stakeholders in practicing and developing responsible business models in line with the company's commitment to generate positive ESG impacts.

Oversight and Implementation

WSRE has appointed an Environmental, Social and Governance Committee (ESG Committee) that will assist the company in fulfilling its responsibilities with regard to, but not limited to, the environment, health and safety, corporate responsibility, sustainability, governance, diversity and inclusion, communities, lobbying and political contributions. Additionally, senior management employees have been designated to oversee the company's operations in the development and implementation of specific ESG areas.

The ESG Committee, together with the senior partners of the company, will conduct an annual review to update this Policy and the ESG agenda of the company.

Principles and Strategy

The principles outlined below list the main development goals for ESG set by the company. Over the course of time, these goals will be expanded or adjusted to make them more effective based on experience and developments in the ESG field.

The principles and strategy have been developed through ongoing conversations of the ESG committee along with the senior partners of the company.

The company aims to maximize the impact of its ESG efforts by pursuing the following principles:

- Energy Consumption: reduce the primary energy demand of assets based on energy data collection;
- Carbon Footprint: calculate greenhouse gas emissions and develop a reduction strategy;
- Social Value: support social responsibility towards employees, suppliers and communities;

- SDGs and Other Initiatives: work towards compliance with SDGs (United Nations Sustainable Development Goals) or other global initiatives;
- ESG Key Performance Indicators (KPIs): establish goals to be achieved in the future to improve our environmental impact; and
- Risk Management: identify and mitigate risks to prevent breaches that can potentially damage the company's business and reputation.

White Star Real Estate's approach to ESG

Within the principles outlined above, the company is focused on ESG efforts that will have the highest positive impact.

Environmental Responsibility

From its beginning, WSRE has been committed to being environmentally responsible while striving for continuous improvement. In the near term, WSRE will direct its activities towards ESG and Taxonomy compliance, working towards calculating and controlling the amount of greenhouse gases produced. The company will take active measures to analyse options to reduce its energy consumption and will establish appropriate KPI's through which its progress will be regularly monitored and reported. Additionally, the company will take active steps to spread environmental awareness amongst its employees.

Currently, the company has taken a number of actions to reduce its carbon footprint. WSRE is in the process of analysing energy scenarios of its operations, in order to reduce energy consumption. The company has started collecting further data to allow analysis which will translate into more effective identification of actions to support the reduction of CO2 emissions. The company is open to introduce new and innovative technologies that will have a positive impact on its tenants and stakeholders.

Moreover, green certification is already a significant aspect of the WSRE investment process. Over 80% of the WSRE building portfolio is already BREEAM or LEED certified. All relevant projects under development and future projects of the company will be certified with internationally recognized, multi-criterion, environmental certification. It will allow WSRE to provide clients with projects of the highest standard, and to reduce the negative impact on the environment accordingly.

Social Responsibility

WSRE seeks to create and support social initiatives around its operations that have a direct impact on its stakeholders and communities. The company takes actions to create properties that are open to the neighbourhood, to support and promote community integration.

At White Star Education Foundation, the company supports non-profit social innovators with an emphasis on free digital educational resources for K-12 and university students in Poland and abroad. WSRE believes that education is a driving force for social progress and takes a collective approach to initiate any social change.

The social initiatives currently supported includes:

- Katalyst Education Foundation - a non-profit social initiative incubator that supports the use of digital resources among Polish K–12 students. The Foundation created and operates Pi-stacja - an online channel with short video tutorials - and Career Map - Poland's #1 free comprehensive set of effective career guidance tools;
- OpenStax Poland - an affiliate of OpenStax, a Rice University owned non-profit organisation which provides free on-line textbooks and is creating products to revolutionise education;
- Katalyst Engineering - developed and operates a "Gotta Get Engineering" program that teaches engineering concepts to students in Polish primary schools using an innovative, interactive curriculum and industrial engineering tools (3D printers) during regular classes; and
- Friends of Children's Hospitals in Warsaw Foundation – raises money to modernise paediatric wards and buy revolutionary state-of-the-art equipment.
- "I MY" Foundation – a non-profit organization from Soběslav, in the Czech Republic, which cares for mentally and physically disabled children and their families.

At the same time, WSRE will continue to prioritize its social responsibility by ensuring that all stakeholders work together in accordance with high standards of health and safety.

Governance Responsibility

WSRE adheres to all laws and regulations in the jurisdictions where it has activities or operations.

The company is committed to conducting its activities in accordance with best business practices, to build a successful and sustainable business that is a valued member of the communities and business groups in which it operates. The WSRE Code of Conduct outlines our values, ethics and responsibilities, as well as requiring a culture of transparency, fairness, respect, and honesty.

WSRE operates in accordance with anti-corruption laws and regulations in the jurisdictions in which it has activities or operations, and in accordance with industry best practices. Furthermore, the company is committed to conduct its business activities in compliance with the principles set out in the UK Bribery Act (UKBA), the US Foreign Corrupt Practices Act (US FCPA), and US anti-terrorism and economic sanction laws.

Risk Management

The company has multiple subsidiaries, each of which deals with a part of the overall White Star Real Estate business.

In the coming years, the company will strive to make the risk analysis component an increasingly important part of its operations, and in particular will work to deepen its efforts to identify the risks associated with ongoing climate change and the environment.

Summary

This Policy commits the company to be compliant with EU environmental objectives such as climate and other environmental indicators (including emissions, water and waste), social objectives (including diversity and inclusion) as well as governance objectives (including anti-corruption matters).

Furthermore, WSRE aims to join and to be an active member of other ESG initiatives in the coming years, such as the United Nations Sustainable Development Goals (UNSDGs) or the United Nations Global Compact. Participation will allow the company to achieve an even higher level of transparency in its actions, as well as help future investors to support sustainable development through cooperation with WSRE.