

GROUP ENVIRONMENTAL POLICY

Adapteo.

Environmental Policy

Approved by the Adapteo Board of Directors
December 14th 2023

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1. Definition of the framework

1.1 Background and purpose

This policy is a complement to the Sustainability Policy with the purpose of clarifying the group approach on how to implement the environmental focus areas “sustainable buildings”, “resource-efficient production”, “circular design” and “design for sustainability” according to Adapteo’s sustainability strategy.

1.2 Applicability

The principles and requirements defined in this document must be followed by all Adapteo Group subsidiary companies, business units, management, and employees. Contract employees of Adapteo Group must also be aware of and shall follow the principles defined in this document as applicable.

1.3 Status and relationship to other policies

This document has been approved by the Board and is a part of Adapteo Group policies. Other environmental-related policies and instructions, including the *Sustainability Policy* and *Business Partner Code of Conduct*, within Adapteo Group shall be in line with the content of this document.

1.4 Ownership and changes to the policy

The Chief Sustainability Officer is the owner of this document and oversees that other policies and other operational guidelines are aligned with this document and shall propose any necessary changes to them. Any changes to this document shall be approved by the Board.

1.5 Effectiveness

This document is effective as of 4th December 2023 and until further notice.

2. Environmental governance

The following section provides practical guidance to put environmental aspects relevant to the construction sector into practice to demonstrate environmental awareness and promote responsibility.

Adapteo Group shall:

- Apply the precautionary approach in decisions that may have a negative impact on the environment in general, and climate, resource scarcity, pollution, biodiversity, and ecosystems in particular.
- Commit to protect the environment and prevent pollution by undertaking initiatives to promote greater responsibility.
- Encourage the development and diffusion of environmentally friendly technologies to use in our own operations and in our customer offering.
- Implement a process to identify and manage potential and actual environmental risks within our own operations as well as the outsourced operations and value chain. This includes regular internal and external audits of suppliers.
- Continuously improve our environmental performance. We shall therefore monitor, measure, and reduce the environmental impact of our operations and products through short-term and long-term targets and applicable metrics. The performance shall be subject to annual review and communicated through our website and sustainability report.
- Ensure compliance with local and regional environmental legislation and regulations, as well as industry standards and other environmental requirements.
- Ensure that all employees have read and understood the content of the Environmental Policy and are committed to implementing and improving our environmental performance.

2.1 Environmental principles in procurement

Adapteo purchases materials in accordance with Adapteo’s Material Guideline, considering the environmental impacts of building materials, in manufacturing and during use. When requested, Adapteo purchases approved materials as defined by building certifications considering materials impact on human health and the environment, in accordance with customer demands in the markets where we operate. Adapteo encourages suppliers to provide Environmental Product Declarations (EPDs) or other environmental performance data of materials. When sourcing new suppliers, products, and materials Adapteo Group shall include environmental requirements and principles as defined in the Business Partner Code, including but not limited to:

- Suppliers committed to reducing greenhouse gas emissions including reduction of energy intensity, transitioning to renewable energy sources, use of electric vehicles, working machines, as well as sustainable biofuels. Suppliers committed to circular production including promotion of biobased materials, reduction of material consumption through process optimization, the longevity of products, and reduction of waste through material reuse, recovery, and repurposing. Traceability and responsible sourcing of raw materials such as minerals, timber, and wood.
- Third-party verified products and materials approved by environmental building certifications.
- Energy-efficient IT, lighting, and HVAC (heating, ventilation, and air conditioning) systems.
- Restriction of hazardous chemicals and SVHC (Substances of Very High Concern).
- Energy and resource-efficient, fair-trade, locally produced, organic, and/or preferably third-party certified products according to accredited standards when purchasing: office supplies, food, beverages, cleaning supplies, textiles and garments, paper, wood, and wood fibre products as well as electric devices in offices.

2.2 Energy and greenhouse gas emissions

Adapteo Group bases our climate efforts on scientific research and best practices within our industry. Adapteo Group strives to reduce our direct and indirect emissions in line with the Paris Agreement, and shall, therefore:

- Assess the impact from our operations from a value chain perspective by applying the Greenhouse Gas Protocol, and further assess the impact of our products by conducting Life Cycle Assessments (LCA) and analysing Environmental Product Declarations (EPDs) for building materials.
- Purchase electricity and heating derived from renewable energy sources, for new and existing facilities, when possible, and encourage tenants to invest in renewable energy schemes.
- Ensure that our data hosting provider has an environmental policy covering emissions, responsible use of new equipment and disposal or reuse of equipment.
- Promote facility leasing agreements with energy-efficient lighting and HVAC systems and ensure that such systems are set to a timer.
- Promote responsible energy consumption to reduce wasteful consumption, by e.g., offering remote monitoring systems, enabling tenants to track and reduce energy consumption, turning off electronic devices when not in use and clearing data stored in the cloud to reduce the environmental impact of cloud computing.
- Promote responsible business travel and meetings by using videoconferencing and selecting low-carbon/low-emissions means of transportation to the extent possible.
- Promote circular economy practises, a core advantage of adaptable, modular buildings, which also typically yields a lower carbon footprint.

2.3 Circular economy principles

Adapteo Group commits to continuously expanding our circular flows throughout the lifecycle of our products, from product development, production, planning, delivery, building utilisation, reuse, and upcycling. This includes:

- **Design for circularity** by continuously evaluating and choosing more sustainable construction materials, cleantech solutions as well as end-of-life management (enabling refurbishing, disassembly, reuse and recyclability).
- **Industrial production techniques with increased productivity**, with optimised resource utilisation of; material, energy, and water; and reduced residual materials.
- **Prolonged lifetime of products** by disassembling, refurbishing and reusing building units. When a building unit has reached the end of its rental lifecycle, it is primarily sold or donated to serve another purpose and in rare cases disassembled for recycling.

2.4 Resource efficiency and waste management

Adapteo Group further commits to adhering to circular economy principles throughout our operations and shall, therefore:

- Raise employee awareness on responsible consumption of products and materials by identifying and reducing redundant and wasteful consumption of resources whether it may be office consumables such as paper and stationary, or construction materials and water.
- Reduce, reuse, refurbish and recycle products and materials, in that priority order. What cannot be reduced, is reused, and what cannot be reused is refurbished or recycled, to reduce the amount of waste disposed of.
- Adhere to industry standards for responsible waste management including the application of appropriate waste fractions according to waste streams, as well as permits, documentation, transportation, and handling of hazardous waste.

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