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Introduction

We see sustainability as working towards positive longterm social, economic, and environmental solutions and developments; that is our sustainability focus. We consider it a never-ending job to learn more and continuously improve how to work with sustainability. That has been our way of thinking for many years now. This document has been prepared to explain these many years of evolution within Vastint, describing where we stand today and in which direction we are heading.

While preparing this sustainability strategy, we have considered the market performance, current trends, and our stakeholders' existing and future needs. The trends in society, including high urbanisation rates, a comparative lack of good, flexible, and sustainable offices and homes, and the expectations of the new generation of employees and residents, are changing the traditional real estate market and must be focused upon. Moreover, specific sustainability trends such as the decarbonisation of the industry, alignment with EU regulations like the CSRD and EU Taxonomy, and increasing focus on impact, data, and value chain require a significant effort from everyone to meet market demands and contribute to a more sustainable society.





A different way of thinking

Society is changing, with more people moving to cities and growing demand for convenient, eco-friendly offices and homes. We have already adapted to these trends by aiming for high environmental standards and making our spaces more flexible, with plenty of amenities and biodiverse green areas.

The 'Vastint way' is our way of thinking and approaching development, and it's part of everything we do, from land acquisition to ongoing building maintenance. It's about continuously improving our products for sustainability, quality, customer experience, and flexible space. Throughout this report, we'll demonstrate what this looks like in practice.

An alternative way to develop

Our 2021-2026 Vastint Business Plan, approved by the Board and Shareholder in December 2021, outlines how we are rethinking the construction of buildings. Traditional methods are typically inefficient and less cost-effective or sustainable.

One way we have found to innovate is by using more prefabricated building parts, whether made externally or in-house. From a sustainability point of view, this allows us to respect the circular economy and take full responsibility for our products throughout their entire lifecycle, from cradle to cradle.

Prefabrication also gives us better control, allowing us to choose materials early on, consider their environmental impact, and plan for reuse or recycling. It means we can opt for eco-friendly options like green cement and steel, even if they initially cost more, since they offer more long-term value. Using more prefabrication also creates a more human-centred development process, with less time spent on construction sites – especially in rough weather – creating safer working conditions.

Building the future

For many years, we have acquired land at increasingly desirable locations on larger cities' outskirts; our development pipeline is strong. Securing future development sites means going even further suburban. Our strategy is to create new mixed-used districts with facilities that the local population values, ideally with strong transport connections. This is a huge benefit as the urban population grows and new developments spread further from city centres. Going suburban gives us a perfect opportunity to contribute to society with high-quality and sustainable neighbourhoods.

Developer and owner

With 35 years of development and construction expertise behind us, we have a portfolio of high-quality buildings and deep technical knowledge in managing them. Over the last decade, we have used our knowledge to continuously improve what we do to ensure all our properties are as sustainable as possible. Furthermore, we have a lot of information on our buildings, including technical ideas and principles for operating and maintaining them. We use all this knowledge to continuously improve our daily property management activities and guarantee sustainable ownership of our portfolio properties.

Our sustainability focus

Being one of Interogo Holding's businesses, our sustainability approach is aligned with our shareholder's sustainability policy and structured around their three dimensions: Invest, Influence, and Live. The policy outlines Interogo's sustainability approach, the three ESG priorities (Climate, Inclusion and Business ethics) and their commitments.





During 2022, Interogo continued to develop the group sustainability agenda together with their businesses. Interogo established objectives for each of the group priorities, enabling clear follow-up, focussed actions and progress:

Climate: Measure and continuously reduce CO₂/GHG (greenhouse gas) footprint/intensity to reduce Interogo's climate impact.

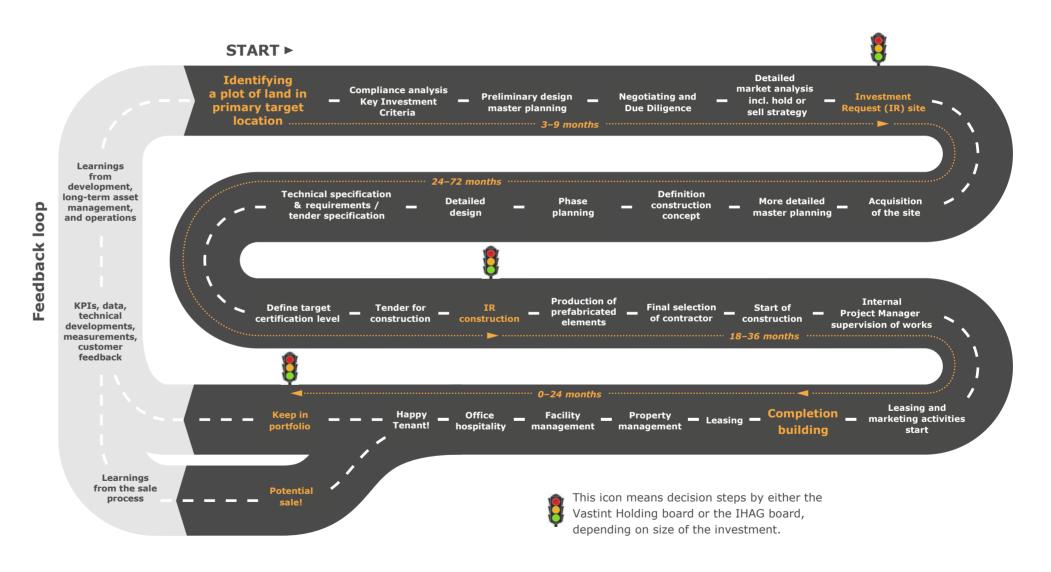
Inclusion: Long-term goal to achieve a balanced gender representation in senior management, Investment Committees and Boards.

Business ethics: High business ethics and governance standards based on enhanced training, digital tools and measurement.

This sustainability strategy focuses on all real estate activities of Vastint and Hotel Co 51. In it, we try to capture all essential elements and activities related to sustainability, which we have already done over the last decade. We want to continue being a market leader in the broader sustainability area. By continuously focusing on the defined areas in the strategy, we positively affect the communities where we are active. Furthermore, we focus on improving our sustainability activities and meeting future market demands. Our vision is to develop and maintain comfortable and sustainable business, leisure and residential environments for the local communities, in our markets.

Embedding sustainability: The Vastint Way

"The Vastint Way" is an approach and way of working developed over many years. Sustainability is central to this and integrated into our work at every stage of the development process. Sustainability is also integrated into the "Vastint **Group Project Guidelines" that** set the highest standards for our designers, engineers and project teams.



Embedding sustainability: The Vastint Way

Our feedback loop for progress

As a long-term owner and developer, we have the opportunity to drive longterm improvements. We do this by creating a deliberate feedback loop that continuously draws upon our employees' experiences and project insights. We gather feedback from every stage, from development to operation, and use it to keep improving our buildings, down to the most minor details. This means we continue to make progress - step-by-step - on our sustainability efforts.

Sustainability in the acquisition phase:

- Doing our due diligence: When considering a new site or building, we always include sustainability in our research. It's a crucial part of how we identify potential sites.
- Setting improvement standards: We include an improvement plan in the investment request if a potential site or building doesn't meet our sustainability standards. This includes remediating polluted brownfield sites and improving a building's energy performance.
- Certified green buildings: All our new developments achieve a green building certificate. Early in the design phase, we choose the best certification scheme based on local and market conditions.
- Compliance with EU Taxonomy: We design and built according to the EU Taxonomy requirements by carrying out an assessment right at the start.

Sustainability in the design phase:

- Drawing on in-house expertise: We actively develop and learn from our internal knowledge and experience. Applying lessons from one project to another is crucial for achieving success in sustainable development.
- Using innovative ways of working: We design and build to our unique principles and guidelines, including using as many prefabricated elements as possible. This gives many advantages, including energy efficiency, better air quality, high-quality materials, and less waste.
- Designed to the highest industry standards: Our designs align with green certifications and EU Taxonomy to make buildings even more sustainable and help monitor our sustainability performance.
- Applying maintenance expertise: As we manage our buildings, we use the insights and experience of our property management teams to improve our designs.

Sustainability in the construction phase:

- Safely run: Prefabricated building elements promote safety by reducing time spent at construction sites, especially in harsh weather, so there's less risk of accidents.
- Sustainably managed: Our projects are overseen by our Project Managers, who understand our design, construction guidelines, and sustainability practices.

Embedding sustainability: The Vastint Way

Sustainability in the operational phase:

- Always improving: Our Property Managers continuously review the sustainability performance of our properties and implement improvements as necessary.
- Aspiring for better: We often use "in-use" certifications to further improve and verify our portfolio's sustainability.
- Setting new targets: All properties are evaluated annually based on sustainability performance and (upcoming) EU regulations. Property Managers develop energy and sustainability improvement plans, aligning them with maintenance and renovation plans.
- All buildings should have a plan to reach net-zero by 2030.



of our sustainability strategy

We have identified six focus areas to highlight our top sustainability priorities for each project and Vastint. For each focus area, we have outlined our primary goals.



- 1. High quality building development with positive climate impact
- 2. Sustainable building operations and property management



- 3. A happy, healthy environment for the many
- 4. Our culture: Professional, entrepreneurial and inclusive



Governance

- 5. Good business ethics
- 6. Responsible investments

of our sustainability strategy



High quality building development with positive climate impact

- Developing energy efficient buildings
- Supporting the circular economy and lowering the impact of embodied carbon
- Creating a positive impact on the environment
- Certifying all buildings with a green buildings certificate

Sustainable building operations and property management

- Measuring and reducing energy consumption
- Working towards Net Zero operational carbon in 2030
- Using renewable energy in all buildings
- Using green building certificates for existing buildings

of our sustainability strategy



A happy, healthy environment for the many

- Creating a safe working environment
- Developing healthy environments for the many people
- Contributing to communities with our hospitality program
- Happy tenants in all our buildings

Our culture: Professional, entrepreneurial and inclusive

- Promoting diversity and inclusion in our organisation
- Guaranteeing equal opportunities

of our sustainability strategy



Good business ethics

- Guaranteeing good business ethics in line with the Code of Conduct
- Raising concern line
- Prioritising what matters

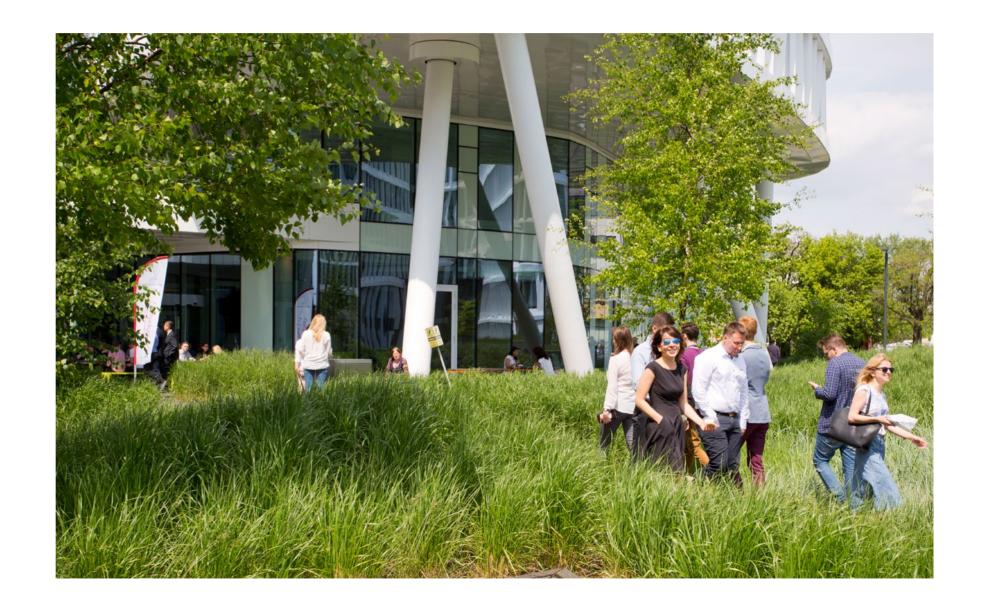
Responsible investments

- Integrating ESG factors into our daily business
- Incorporating ESG in the Vastint Guidelines for new developments
- Assessing and aligning with EU Taxonomy and other EU legislation



High quality building development with positive climate impact

As a real estate owner and developer, we develop and build buildings for own portfolio with a focus on long term ownership. There is no greater motivation for building very good buildings, in terms of quality, user experience and sustainability performance. This process starts with designing our own buildings based on 35 years of experience.





Developing energy-efficient buildings means two things: designing for optimal energy performance and ensuring that the building operates as intended once completed.

Striking a balance

We have prioritised high standards in our building designs for years. However, high standards often demand higher energy for building ventilation, cooling and heating, and lighting. All these aspects positively influence the indoor climate and customer experience but require a certain amount of energy. With the rise of nearly Zero-Emission Building (nZEB) requirements, striking this balance has become more challenging. nZEB mandates excellent energy performance with energy efficiency measures, and the remaining energy demand must primarily come from renewable sources. All of Vastint's new buildings must be designed to be carbon-neutral without compromising their high standards. Whenever feasible, we strive to use renewable energy.

Air-tightness testing

We conduct air-tightness and thermal integrity tests to guarantee that our buildings meet their designed energy performance. Using prefabricated building elements produced in a controlled environment is a massive benefit because failures in the construction process often cause a lack of air tightness.

Commissioning and continuous learning

All buildings undergo post-construction commissioning to ensure that the structure and its installations perform as intended. If we find deviations during commissioning, we can easily adjust thanks to our ability to track down every component installed in the building. Another benefit of using prefabricated elements is that it enables detailed engineering and continuous learning based on actual building performance.



Goal:

All new buildings must meet national nZEB criteria and focus on 10% better primary energy demand.



KPI:

Percentage of buildings nZEB - 10%



Target 2024:

100%

Target 2025:



Supporting the circular economy and lowering the impact of embodied carbon

For us, buildings are material banks for the future – once buildings can no longer be used, they should become secondary raw materials for new buildings and products through recycling. That is why we are working on designing buildings to last as long as possible, and materials keep their value after the lifespan of the building.

What is embodied carbon?

Embodied carbon represents carbon emissions generated across various stages, from raw material extraction to manufacturing, transportation, construction, use, and end-of-life. We calculate the impact of all materials used in every project, including that of their transportation and construction.

Genuine cradle-to-cradle thinking

For many projects, we opt for pre-fabricated construction methods that are standardised but are still flexible enough to create unique projects and buildings. Using our prefabricated building elements lowers the embodied carbon as we can design to use materials as efficiently as possible. These methods form the foundation for genuine circular cradle-to-cradle thinking because we can trace materials at an early stage of development, understand their origin, their environmental impact, and the best way to reuse or recycle them. Plus, we can minimise the amount of waste because we have precise specifications and only order what we need. Additionally, our feedback loop helps discover tried and tested sustainable, longer-lasting products.

We plan to create a building material passport for each new development to enhance material reuse. We will develop design and material guidelines to minimise embodied carbon impact for (re)developments.



Goal:

We calculate the global warming potential (GWP) for each development property to define embodied carbon tied to design and construction.



KPI:

GWP calculation for all new developments



Target 2024:

Systematic approach for the calculation of embodied carbon and material tracking

Target 2025:

100% of new developments have a GWP calculation



Construction inevitably impacts the environment, especially in densely populated urban areas. Projects typically span 2-4 years, with daily noise and disruption to people who work and live nearby. A constant flow of new materials is being brought on-site, and a large workforce is needed to see each development through to completion. We are working on preventing this impact across all of our projects and promoting better ways of working to protect the environment.

Preventing impact

We implement prevention plans in all development projects to minimise environmental harm. Our plans involve multiple ways to minimise the impact of potential pollution, material waste, noise and other project-related issues.

Reducing impact with prefabrication

Using prefabricated products and off-site construction has helped us reduce our impact in essential ways:

- 1. **Fast and efficient:** Buildings can be fabricated in a quality-controlled environment. This allows us to improve productivity.
- 2. **Streamlined transport:** With materials used in the building shipping at once, there's less traffic, disruption, and fewer emissions.
- 3. **Fewer workers, in safer conditions:** We can minimise the on-site construction crew with much of the work taking place off-site. This reduces traffic and disruption. It also helps mitigate labour shortages in the industry.
- 4. Reduced pollution: Prefabrication off-site lowers pollution risk, reducing on-site chemical use and waste.

Creating a positive impact

We prioritise biodiversity and nature across our developments, incorporating features to support local biodiversity, such as green spaces, trees, and flowers. These areas boost biodiversity and provide natural shade, mitigating heat stress. Our gardens are also great places to connect, interact, relax and play sports with neighbours, colleagues or others.



Goal:

To create a positive impact, buildings should consider green areas, biodiversity and areas that help bring building users together.



KPI:

m² as % of the total project site



Target 2024:

At least 20% of the project site

Target 2025:

At least 20% of the project site



Certifying all buildings with a green buildings certificate

We have ensured that our new buildings and refurbishments meet specific environmental standards for many years. Every new building and renovation must be awarded an environmental certification during development or operational phases.

Where possible, we align with internationally recognised systems like LEED or BREEAM. Each new project undergoes continuous evaluation throughout its design and construction phases, with certification granted upon completion. We strive to achieve LEED Gold or BREEAM Excellent certification, or above, in all new developments and refurbishments.



Goal:

Continuing green building certifications and constantly evaluating and improving certification scores.



KPI:

% of square meters certified



Target 2024:

100% of all new developments

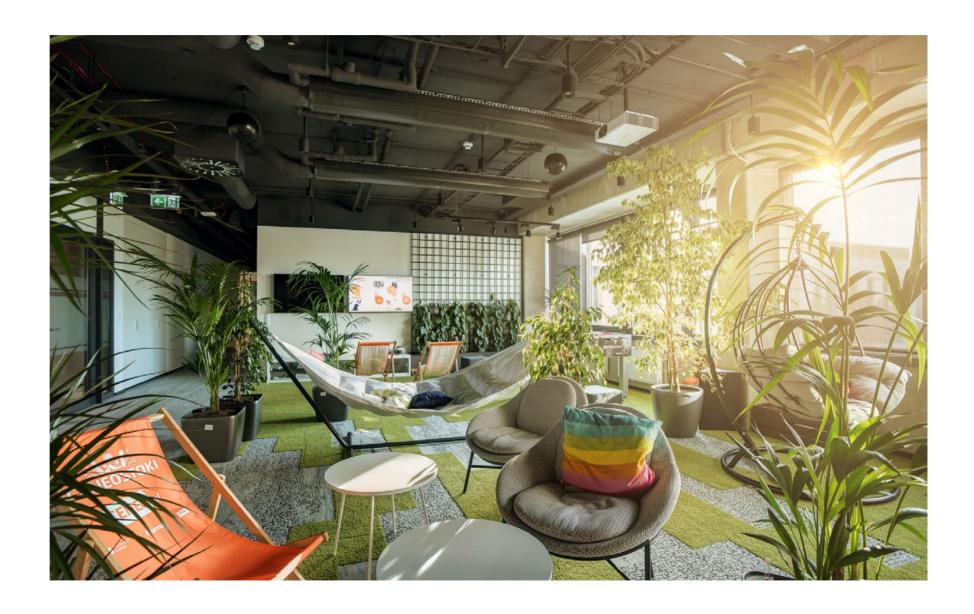
Target 2025:

100% of all new developments



Sustainable building operations and property management

A well-managed property adds value for both owner and occupier. We proactively manage our buildings to run optimally and meet tenants' expectations. We equip all properties with state-of-the-art technology and software for professional and sustainable operations. We apply the insights we gain to improve how we manage and develop our properties.





Lowering the impact of carbon starts with measuring and understanding consumption using an energy performance management system. Most of our divisions already measure the energy consumption of our buildings on an annual basis. We will connect all energy consumption data to one system, enabling us to measure, analyse and compare all buildings' consumption. This proactive approach helps us identify energy-saving opportunities.

Reaching Carbon Risk Real Estate Monitor (CRREM) targets

CRREM is a program dedicated to decarbonising real estate, aligning with the Paris Agreement's goal to limit global warming to 1.5°C. CRREM joined forces with the Science Based Targets initiative in 2022, one of the leading partnerships worldwide for measuring and lowering organisations' carbon footprint. We use targets defined by CRREM to compare our buildings with sector-wide accepted targets and reduce our footprint at a property level. These targets also help us identify potentially stranded assets that won't meet future energy efficiency standards or market expectations.



Goal:

All buildings are connected to a monitoring program to measure, analyse and optimise the energy performance. Property Managers are trained to analyse data and act upon it. The energy consumption is in line with CRREM 2050 targets or has a plan to reach this level.



KPI:

CO₂-consumption per m²



Target 2024:

61 kg CO₂/m²

Target 2025:

Working towards Net Zero operational carbon in 2030

Whenever feasible, we want net-zero carbon emissions in our operational phase by 2030. Our buildings must either generate all needed electricity on-site from renewables or import it.

Carbon footprint measurement standards, like the Greenhouse Gas Protocol, are vital to our net zero efforts. This protocol categorises emissions into three scopes:

- Scope 1: direct emission from sources owned or controlled by Vastint. These include on-site combustion of fuels, such as natural gas for heating or diesel for construction machinery or backup systems. It also includes emissions from owned vehicles used for commuting, construction or operational purposes.
- Scope 2: indirect emissions from purchased electricity, heat, or steam consumption. This would typically involve the electricity consumption of the buildings owned and operated by Vastint.
- Scope 3: all other indirect emissions that occur in the value chain of buildings. These emissions result from activities not owned or controlled by Vastint but are associated with our operations. This includes emissions from materials, construction process, transportation of construction materials, tenant energy use, waste generation, business travel, and other related activities.

A net zero-carbon building does not emit any CO₂ during the operational phase, for instance, by producing electricity on-site. If renewable energy from off-site is imported to meet the balance, it can also be called net zero operational carbon. The challenge for our buildings is to find solutions for the usage of non-renewable sources for heating, such as natural gas and district heating.

The carbon footprint is calculated annually for every portfolio property. The following factors are included in the carbon footprint of buildings: energy consumption, cooling refrigerants, water consumption and waste generation. This data serves as a starting point for future carbon reduction efforts. Our next step is to measure and reduce our Scope 3 emissions.



Goal:

All buildings have a roadmap for reaching net-zero operational carbon, including an overview of what has been done in the last years. Measures should be integrated with upcoming maintenance and renovation plans.



KPI:

Buildings with a net-zero roadmap



Target 2024:

50% of properties have a net-zero roadmap

Target 2025:

100% of properties have a net-zero roadmap



Renewable energy comes from sources with minimal environmental impact that help reduce greenhouse gas emissions. It includes solar, wind, hydroelectric, geothermal, and biomass energy. We generate energy on-site wherever feasible, and off-site energy must be certified with a Guarantee of Origin (GO). We recognise that this may still pose a challenge on certain markets, however we always strive to accomplish this.

As a landlord responsible for procuring energy, we commit to sourcing all electricity from renewable sources on-site or off-site. If available, we also use renewable energy for heating.



Goal:

We'll continue our green electricity program, continuously assess energy origins, and collaborate proactively with suppliers to secure the best energy sources.



KPI:

% of green energy



Target 2024:

50% of the total energy consumption

Target 2025:

50% of the total energy consumption



Using green building certificates for existing buildings

For buildings that weren't certified during construction, we assess them using an in-use certification scheme. In-use certification schemes are also used to evaluate and optimise the operations of our buildings.

We often use BREEAM In-Use to certify existing building performance, focusing on sustainability and management. Certification is never the goal. Our goal is to continuously improve ourselves and our buildings. When we certify with BREEAM In-Use, we create improvement plans to aim for higher scores in subsequent certifications.



Goal:

Every project should hold at least one internationally recognised green building certificate (LEED or BREEAM). We will develop improvement plans if we have not reached the desired LEED Gold or BREEAM Excellent level.



KPI:

% of square meters certified



Target 2024:

100% of all existing buildings

Target 2025:

100% of all existing buildings



A happy, healthy environment for the many

Vastint buildings are more than a place to have a desk or to sleep. We offer highquality, comfortable, sustainable offices, hotels and homes in well-connected locations with a wide range of facilities and greenery. Places to come for a change of scene, to create and collaborate. In other words, it is a place people look forward going to.





We do all we can to guarantee safety in all our development projects and existing buildings.

Safety in construction

Construction activities in development projects comply with laws and regulations, with our Project Managers overseeing contractor performance across various areas. We appoint independent safety coordinators in some markets to ensure legal compliance and recommended safety measures. As detailed in this report, pre-fabrication helps make the construction process safer by minimising the workforce and time needed on-site.

Safety across operations

We often consider health and safety certifications, training and guidelines for our portfolio properties. Our insurance providers conduct continuous risk assessments, covering ten risk areas. Key areas include natural hazards, management, security, construction, and human factors. Each building undergoes systematic evaluation, resulting in a Loss Prevention Report that outlines strengths and improvement suggestions. We then integrate these recommendations into all future property management efforts.



Goal:

Projects are continuously evaluated from a risk perspective. There are no severe accidents on construction sites, factory production, and in our projects. Potentially, risks are mitigated in an early stage.



KPI:

Number of accidents reported



Target 2024:

0 accidents

Target 2025:

0 accidents



Developing healthy environments for the many people

People spend about 90% of their time indoors, so we must operate healthy buildings with a comfortable climate. Indoor air quality, temperature control, and overall building quality are increasingly important. We use the WELL Building Standard to assess building performance and address and certify health aspects.

World-class technical standards

While every building is unique, we uphold world-class standards, that go above and beyond local regulations in all our designs:

- Three-meter floor-to-ceiling heights as standard create spaciousness and maximise light.
- Column-free spacious floors offer total flexibility to design office spaces.
- Large openable windows and efficient ventilation give fresh air and maximise daylight.
- Stringent, above-regulation fire, health, and safety features create peace of mind.
- Well-insulated structures with efficient heating, cooling, and ventilation systems offer optimal comfort.
- Ample green areas with natural shade create pleasant gathering spots and outdoor temperatures.



Goal:

All new projects should consider healthy environmental aspects in their concept. LEED, BREEAM and the WELL building standard schemes could provide valuable insights and guidance on healthy aspects in buildings.



KPI:

% of buildings with a green building certification



Target 2024:

100%

Target 2025:



We believe buildings are more than a place to work, stay or live. We aim to create more sustainable, comfortable, and friendly environments for all our tenants and guests. Projects like our Business Gardens, residential complexes, and hotels illustrate how this works.

Helping to create communities

For larger projects, we often incorporate a hospitality concept that provides imaginative services to enhance the daily lives of our tenants. These services include daycare, restaurants, food truck festivals, convenience services, sports facilities, and cultural events. We aim to foster a vibrant community that people want to belong to.

Welcoming lobbies

Our buildings feature unique lobby concepts designed to offer a warm and friendly welcome to anyone who walks through the door. These lobbies are not just transitional spaces; they are inviting areas with coffee machines, seating, and welcoming reception staff, encouraging guests and tenants to use them as meeting spots.

Ultra-convenient developments

Our locations prioritise accessibility to public transportation, making it easy to reach the city centre and the airport. Human-scale office buildings and cosy common areas create a comfortable atmosphere. Outside, our spacious gardens provide a friendly space for recreation and events. We also always tailor on-site amenities to meet the specific needs of our tenants.



Goal:

All large-scale development projects should incorporate amenities that contribute to the local community, enhancing the experience for tenants and users.



KPI:

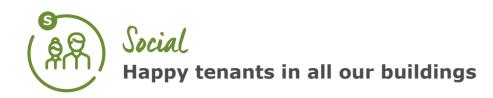
% of large-scale projects with amenities



Target 2024:

100%

Target 2025:



Sustainability goes beyond the physical structures we build to encompass the experiences of all those who work, live and stay in our buildings. Tenant satisfaction is at the core of our sustainability approach. Excellent working and living environments contribute to the well-being of our communities. When our tenants are happy and healthy, our projects will succeed long-term.

Listening to our tenants

Open communication with our tenants is crucial for us. We want to ensure that their concerns and feedback are valued and acted upon promptly.

We carry out regular engagement initiatives, such as tenant surveys and community meetings, so we can understand their needs, preferences, and suggestions for improvement. This approach helps us improve our sustainability and hospitality efforts.

Affordable, lower carbon living

Investing in energy-efficient technologies and sustainable building practices reduces our carbon footprint and lowers utility costs. Affordable living is a critical factor in our tenant satisfaction, and our commitment to energy efficiency directly contributes to more budget-friendly living arrangements.



Goal:

Creating happier tenants by actively working together, gathering feedback, and using it to improve our buildings and processes.



KPI:

% of tenants moving out because they are not satisfied



Target 2024:

0%

Target 2025:



Our culture: Professional, entrepreneurial and inclusive

The Vastint culture is crucial to our success, enabling employees to be entrepreneurial, make decisions and accomplish great things with energy and passion. We dare to be different.





Promoting diversity and inclusion in our organisation

Providing meaningful and decent work for people is essential to a functional economy and a fair and inclusive society. In this way our activities can influence and support positive change. By championing diversity and inclusivity, we can help strengthen businesses and contribute to a more equal society.

One of our core values is allowing people to be themselves. We are proud to have a wonderfully diverse and international team, with over 70 nationalities represented.

Our colleagues also come from various educational backgrounds, spanning construction, real estate, finance, legal, and more. Combining our skills and encouraging each other to improve in all we do can enhance our creativity and decision-making, ultimately building better buildings.



Goal:

Our organisation reflects various backgrounds, experiences, and perspectives. We aim to foster an inclusive environment where all employees feel valued, respected, and empowered to contribute their best.



KPI:

Gender balance in the organisation



Target 2024:

Interogo D&I guideline implemented

Target 2025:

40% of women or other underrepresented genders in the organisation

We are committed to nurturing a work environment that promotes growth, learning, togetherness, physical and emotional well-being, and a healthy work-life balance. This includes supporting co-workers in combining parenthood with their professional careers.

Our hiring and engagement practices prioritise equal opportunities. We do not discriminate based on gender, appearance, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, or social and ethnic origin. We recognise the existence of unconscious biases and aim to help each other understand and overcome them.

We respect fundamental human rights. We acknowledge our responsibility to uphold these rights across our activities and the communities in which we work and live.



Goal:

We want to provide a working environment with equal opportunities for everyone. We want to build on our strong culture and foster a healthy work-life balance for our co-workers.



KPI:

Employee turnover



Target 2024:

10%

Target 2025:



Good business ethics

We can contribute to better, safer, and more trustworthy societies by doing good business. Good business is rooted in honesty, respect, fairness, and integrity. **Upholding ethical principles is crucial for** our long-term success. We are committed to proactively and openly working ethically across all our operations. Corruption and illicit behaviour have no place in our business relationships, whether with our colleagues, suppliers, or partners.





Guaranteeing good business ethics with our Code of Conduct

We incorporate the Interogo Holding Code of Conduct into all our consultancy, service, supply, and construction agreements. Several topics are covered in the Code of Conduct such as:

- Business integrity, with zero tolerance for corruption and guidance on avoiding conflicts of interest.
- Human rights and the working environment, including a commitment to equal opportunities and the right to association.
- Environmental sustainability principles that we expect suppliers to uphold.
- Safeguarding guidelines, including protecting assets and confidential information.

We organise Code of Conduct workshops for our colleagues to share knowledge and encourage discussions. Our tender procedures and partnerships strictly adhere to this code.



Goal:

All employees undergo Code of Conduct training every two years, with new employees completing training within their first three months.



KPI:

% of employees trained



Target 2024:

100% of employees

Target 2025:

100% of employees



We encourage open dialogue among colleagues and urge them to address ideas, dilemmas, issues, and improvements directly with others.

We recognise some situations may need a different approach, why there is the Interogo Holding Raising Concern Line. It offers a safe and protected channel for all colleagues to voice their concerns. Interogo Holding Raising Concern Line is already implemented in every division and should be available to every employee.



Goal:

All employees should know where to find the Raising Concern Line.



KPI:

Number of raised concerns



Target 2024:

0 cases

Target 2025:

0 cases



We have chosen our primary objectives and focus areas based on our years of experience building sustainable buildings and daily conversations with stakeholders. As sustainability evolves, it's crucial to continually expand and redefine our focus in line with expectations from our most important stakeholders.

To establish our main priorities, we will conduct a double materiality assessment as part of the upcoming Corporate Sustainability Reporting Directive (CSRD) once it's incorporated and guidance becomes available.



Goal:

Establish a continuous process for defining and updating our sustainability priorities based on a double materiality assessment by the Corporate Sustainability Reporting Directive.



KPI:

Double materiality assessment done



Target 2024:

Double materiality assessment done

Target 2025:

Annual update



Responsible investments

We integrate ESG (Environmental, Social, and Governance) factors throughout the investment cycle. Sustainability and ESG considerations guide how we invest and use our influence. Screening and due diligence are crucial in our decisionmaking process and significantly impact our investment choices.





Integrating ESG factors into our daily business

In October 2023, the Vastint Responsible Investment Policy (Vastint RI-Policy) was approved by the Vastint Holding Board as part of this sustainability strategy. The RI-Policy is to set aspirations and provide direction and guiding principles for Vastint Divisions throughout the investment cycle. This policy reflects our approach to responsible investments for the upcoming years. It contains supporting checklists to ensure all relevant ESG matters are covered in the investment process. These checklists will be updated yearly or more frequently if specific regulations require so. The Vastint RI-Policy is based on Interogo's sustainability approach: Invest, Influence and Live. For more information, see the Interogo Holding Sustainability Group Policy.



Goal:

Implementing the Vastint Responsible Investment Policy by the end of 2023, ensuring its adoption by all divisions in 2024.



KPI:

% investment requests in line with RI-Policy



Target 2024:

Vastint RI-Policy used for all investment requests

Target 2025:

Vastint RI-Policy used for all investment requests



Incorporating ESG in the Vastint Guidelines for new developments

ESG principles are integral to our design and construction guidelines, forming an essential part of our approach to new developments. The Vastint Guidelines cover important environmental concerns such as water management, pollution control, and biodiversity preservation. Our guidelines also address the technical aspects of indoor environmental quality, transportation, and social and health impacts that affect our work most.



Goal:

The Vastint Guidelines will continue to ensure sustainable building practices and will be regularly updated to remain current and aligned with the latest sustainability standards.



KPI:

% of coverage of EU Taxonomy matters in guidelines



Target 2024:

100%

Target 2025:



Assessing and aligning with EU Taxonomy and other EU legislation

Whenever feasible, we design and construct all new developments following the EU Taxonomy for new construction. All existing buildings will align with the EU Taxonomy for Ownership and Acquisition of buildings where possible. Due to current uncertainties and ambiguities, aligning entirely with the Taxonomy may be challenging. However, we will use its requirements as a benchmark to assess our projects and identify opportunities for improvement.



Goal:

Evaluate all eligible activities and develop improvement plans for projects to enhance alignment with the EU Taxonomy.



KPI:

% EU Taxonomy alignment



Target 2024:

28%

Target 2025:



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