

## **ESG policies of Société de la Tour Eiffel**

Société de la Tour Eiffel has implemented four policies that summarize the group's approach to environmental, social and governance (ESG) issues.

1. Governance policy ;
2. Environmental policy ;
3. Social policy ;
4. ESG policy for development projects.

These policies are reviewed annually by management, updated and communicated to all employees.

These policies follow on the next pages.

## 1. GOVERNANCE POLICY

Through this policy, the governance of the Société de la Tour Eiffel (Tour Eiffel) aims to support the societal and environmental responsibility of the company in its activities and operations. In fact, Tour Eiffel goes beyond the requirements of the regulations and extends its obligation of financial transparency to non-financial indicators with the same rigor and determination.

### Engaging Governance in ESG issues

#### Governance Approach

From 2022 onwards, the Board of Directors of Tour Eiffel will deal with ESG (environmental, social and governance) issues on an annual basis in order to provide key guidance and to approve the proposals of the CSR Committee and Executive Management (creation of an ESG Committee, emanating from the Board of Directors on 29 April 2022). The Board of Directors will ensure that the Tour Eiffel strategy is ambitious and goes beyond regulations on environmental and social aspects. It will also pay particular attention to the following fundamental elements: compliance with the principles of the Global Compact, the fight against conflicts of interest and corruption, business ethics, gender equity and the rights of whistleblowers.

#### Governance Organization

The Executive Management chairs the CSR Steering Committee. The Committee is supported by all employees of the company, and notably by the expertise of Odile Batsère, CSR Director, Hervé Pagnon, Technical Director, Seynabou Sarre, Corporate Lawyer and Fabienne Renucci, Executive Management and CSR Project Manager. This governance at the highest level allows for cross-functional reflection on the company's strategic approach and promotes the strong inclusion of ESG issues in all processes and businesses.

Therefore, the committee decided to publish three other policies to reinforce the commitment of the Société de la Tour Eiffel with:

- Our social policy – to improve the control of our social impact,
- Our environmental policy - to improve the control of our environmental impact,
- Our ESG policy in terms of development.

#### Operating mode of the CSR Committee, as part of the governance process

The committee meets once a month to discuss key CSR issues and their progress. The most significant issues are reported to the Eiffel Tower's management during the Executive Committee meetings. Cross-functional meetings are organized to discuss current issues or joint projects. Communication by e-mail and posters may be sent to all employees depending on the decisions and developments taken by the committee. Targeted reporting is done quarterly to all departments.

#### CSR Committee's function

The CSR Committee has the following missions:

- To define strategic objectives and approaches,
- To monitor the progress of the three-year CSR action plan and refine the annual objectives,
- To monitor improvements in the context of the ISO 9001 and 14001 "Do Check Act" plan,
- To take regulatory, innovation and market changes into account,
- To list key actions and information from the green committees on operating assets conducted with tenants each year,
- To decide on the key meetings to be held between the various departments to improve the CSR strategy in all business lines,
- To improve the tools strategy to involve stakeholders through surveys and questionnaires on CSR issues (employees, tenants),
- To monitor the environment regulatory on issues implying the CSR Committee,
- To raise awareness among Société de la Tour Eiffel employees.

## 2. ENVIRONNEMENTAL POLICY

Société de la Tour Eiffel (the Eiffel Tower Group) aims to improve the control of its environmental impact and has defined as one of its strategic approach, the significant reduction of its assets' environmental footprint. By implementing this policy, the Eiffel Tower Group wishes to support its commitments and to emphasize its actions in terms of respect for the environment.

This ambition concerns the Eiffel Tower Group's two core businesses:

- Investment and development,
- Asset Management, including rental and technical management.

### Controlling the environmental impact

#### Contribution to the energy transition

Thanks to the collaboration with its partner AEGILIM, an energy management consultant, the Société de la Tour Eiffel has a good control over the energy mapping of its real estate assets. This reliability of the buildings energy data allows the company to look forward to the next few years with confidence, particularly the first deadline of the Tertiary eco-energy legal framework (DEET), which is set for 2030 (a 40% reduction in consumption or the achievement of absolute values defined by decree).

The Eiffel Tower Group's ambition is to systematically reduce the energy consumption of its properties and to support its tenants to adopt energy-saving behaviors through environmental committees, for example.

#### Contribution to the fight against global warming

Société de la Tour Eiffel is committed to a Mitigation Plan that consists of measuring the greenhouse gas emissions (GHG) of its activity and implementing actions to reduce them, at the level of all business lines.

This Mitigation Plan complements the CSR action plan of the company's Non-Financial Performance Statement, insofar as longer-term established objectives are intended to meet a series of national programs and texts that aim to be carbon neutral by 2050.

#### Adaptation of real estate assets to the effects of climate change

As the building sector is particularly exposed to the risks related to climate change, the Société de la Tour Eiffel is taking measures to define the sensitivity of its assets to these physical risks in order to be able to react in the event of significant exposure.

In 2021, the group has selected six assets from its real estate portfolio to analyze their exposure to the consequences of climate change. The six "adaptation" audits contain recommendations that are used as a decision-making tool. During 2022, other buildings will be subject to adaptation audits. The general objective is to subject all of its buildings to the analysis of the physical risks exposure associated with climate change.

#### Stakeholder involvement in environmental performance

The Société de la Tour Eiffel is convinced of the need to involve as many stakeholders as possible in its environmental approach in order to have a significant impact, which would contribute to the mitigation of climate change.

*Governance* is involved through CSR committees and *employees* are also involved through training/awareness sessions on ESG issues. For external stakeholders, the Company requires its *suppliers and service providers* to follow environmentally friendly practices through the Responsible Purchasing and Supplier Relations Charter and through an evaluation of service providers working on construction sites and on operating assets. Lastly, green committees with *tenants*, which are held at least once a year, monitor the environmental actions implemented on the asset in question, either by the Landlord or by the Tenants.

In addition, this policy is transmitted to all employees and made available to tenants on the Kolimmo collaborative platform.

### **Reasonable use of natural resources: waste, water and biodiversity**

The Société de la Tour Eiffel is convinced that the circular economy of buildings is one of the major ways to contribute to the mitigation of climate change and is deepening its commitments to this issues. In the same way, the Société de la Tour Eiffel is aware of the importance of preserving biodiversity in order to maintain a climate balance on the planet.

Within the framework of the renovation, processes have been set up to promote actions linked to the circular economy, notably through the commitment of 3 renovation sites within the Booster du Réemploi. Actions in favor of construction and renovation materials' selection have been initiated, for example, with ALGO PAINT (a company specializing in ecological paints). On assets in operation, the property company sorts waste (on 85% in value, in 2021) and sets up partnerships with companies working for the optimized management of waste (Cy-Clope: recovery of cigarette butts, Greenwishes, Lemon Tri and Cèdre: waste sorting and reporting).

In addition, a sustainable management approach to green spaces was launched in 2021 by the property company and will be further developed in the future. The aim is to protect the fauna and flora present on the assets and its business parks. This will also make the reduction of water consumption possible at the properties level.

### **Permanent improvement of the methods**

The Société de la Tour Eiffel has been deploying a voluntary and cross-functional CSR approach that is fully in line with its strategy for the past 10 years.

Continuous improvement work has been carried out by the Company's teams and can be illustrated by the automation of non-financial data in an IT tool (My Even), which makes CSR reporting more reliable and provides a complete view of the real estate portfolio (rental status, technical and environmental data, etc.).

### 3. SOCIAL POLICY

The Société de la Tour Eiffel (Eiffel Tower) aims to improve control of the social impact of its activities on its stakeholders by integrating it into its strategy. With this policy, the Eiffel Tower group wishes to support its social commitments and to highlight its actions in the areas of health, safety, quality of life and well-being for all. In addition, the company wishes to become more involved in the areas of corporate sponsorship, gender equality in the real estate sector and facilitating access to work for young people.

#### Controlling the social impact

##### **Tenant satisfaction**

The Eiffel Tower group is committed to continuously improving the quality of life, comfort and well-being of its tenants. The 100% in-house rental management enables the property company to position itself as close as possible to its tenants and to achieve this objective.

Satisfaction surveys are conducted every year, alternately in the Ile de France and in the regions. Although almost all of the workforce is located less than 500 meters from public transportation, mobility plans have been drawn up for the business parks in order to implement carpooling and soft mobility solutions.

The green spaces are gradually being developed to create places of recreation and well-being for the building's occupants.

##### **Territories and societal commitments**

The Société de la Tour Eiffel aims to broaden the positive impact of its CSR policy in terms of ESG issues to all links in its value chain, and local players are part of this.

The Eiffel Tower Group maintains a natural and regular dialogue with local authorities and residents during its renovation and construction projects and with a number of local players in the context of its sponsorship activities (sponsorship of the Rugby Club de Massy, contribution to the financing of the Fire Brigade, contribution to the Clichy Mécénat endowment fund which promotes cultural, sporting and social activities). In 2021, two new commitments were made through the signing of the University of the City of Tomorrow Charter, which has the general ambition of participating in the construction of a sustainable, low-carbon and inclusive city, and the Charter in favor of gender equality in the real estate sector.

##### **Employees: talent retention and attractiveness**

The Société de la Tour Eiffel is convinced of the importance of retaining its current employees, and to do so, it strives to offer a work environment that is conducive to their development. This means facilitating dialogue between employees and the decision-making bodies, offering activities to promote cohesion (yoga classes, a space for breaks and lunches, etc.), the possibility of teleworking as well as the proposal of various training programs.

##### **Human Rights**

Société de la Tour Eiffel is not directly exposed to the risk of human rights violations as it operates exclusively in France and ensures that its relations with employees and suppliers/service providers comply with the French labor code in its entirety, in order to avoid concealed work.

To reinforce its commitment in this area, the Société de la Tour Eiffel follows recognized international guidelines: annual signature of the principles of the United Nations Global Compact, reporting according to the recommendations of the EPRA sBPR, annual evaluation by the GRESB and the Gaïa Index.

In addition, the company believes in the need for gender equality and ensures this within the company, particularly in terms of compensation.

## 4. ESG POLICY : DEVELOPMENT PROJECTS

As part of its CSR policy, the Société de la Tour Eiffel aims to improve the ESG (environmental, social and governance) impact of its development projects. These projects include two types of work:

- Renovation: of buildings in a phase of heavy restructuring and/or extension,
- Construction: of new buildings with a view to long-term management.

### Controlling the ESG impact of development projects

#### Consideration of ESG issues during the different phases of Development projects

The design and renovation work carried out by the Société de la Tour Eiffel includes, as far as possible, measures to promote the use of bio-sourced materials and to respect the health and well-being of people:

- To deploy a policy of certifications with a minimum level of "Very Good" and environmental labels for development projects
- To protect the planet's resources by integrating circular economy processes,
- To monitor waste emissions and recycling shares,
- Use of partners such as Tricycle and adherence to the Reuse Booster approach (commitment for construction sites),
- Signatures of the companies intervening on the building sites, of a Clean Building Site Charter,
- To reduce the impact of land artificialization,
- Consideration of biodiversity within the sites.

The Company's aim is to renovate and build in an environmentally efficient, locally integrated, flexible to changes in use and rich in services for occupants and stakeholders way.

To achieve this, the Société de la Tour Eiffel strives to:

- Anticipate new occupant expectations by working on the most flexible design possible,
- Maintain a long-term dialogue with local stakeholders,
- Hire as locally as possible for development operations.

#### Continuously improve the ESG impact of Development projects

The Société de la Tour Eiffel has a CSR Action Plan composed of performance monitoring indicators, actions and commitments with precise deadlines.

All the company's employees are aware of ESG issues and the CSR, Development, and Asset Management departments, including Technical and Rental Management, work together to respect these commitments and to deepen the enhance of the CSR policy.