

## **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

The Société de la Tour Eiffel aims to improve control of its environmental impact, and has defined the significant reduction of the environmental footprint of its properties as one of its strategic priorities. In implementing this policy, the Eiffel Tower Group wishes to underpin its commitments and highlight its actions in terms of respect for the environment.

This ambition concerns the Eiffel Tower Group's two operating divisions:

- Investment and development;
- Portfolio management, including Asset Management, Rental and Technical Management.

Société de la Tour Eiffel is also committed to reducing its environmental footprint in relation to its corporate activities. Since 2022, the company has been converting its fleet of vehicles to hybrid and electric vehicles, and changing IT equipment only when it is no longer working, for example.

### Controlling environmental impact

#### Contributing to energetic transition

Thanks to its collaboration with partner AEGILIM, an energy management consultancy, Société de la Tour Eiffel now has full control over the energy mapping of its real estate assets (98% of assets at the end of 2022 are covered by fluid data collection). This reliability of building energy data means that we can look forward with confidence to the coming years, and in particular to the first deadline of the French DEET regulation, set for 2030 (40% reduction in consumption or achievement of absolute values defined by decree).

The Eiffel Tower Group's ambition is to systematically reduce the energy consumption of its properties (in particular by ensuring that all equipment is in good working order) and to encourage its tenants to adopt energy-saving behaviour through environmental committees, for example.

For its development projects, the company seeks to carry out an upstream feasibility study on the production of renewable energies and aims to ensure that all eligible projects include the installation of renewable energy production systems (photovoltaic, geothermal, etc.).

Projects are systematically subjected to dynamic thermal simulation.

#### Contributing to the fight against global warming

Société de la Tour Eiffel has embarked on a Mitigation Plan which involves measuring the greenhouse gas (GHG) emissions generated by its business activities, and implementing actions to reduce these emissions across all of the Company's business lines, with targets for various timeframes.

This Mitigation Plan, detailed in the 2022 Extra-Financial Performance Statement, complements the company's CSR action plan, insofar as longer-term objectives have been set that aim to comply with a series of national programs and texts that aim to achieve carbon neutrality by 2050.

### **Adapting heritage to the effects of climate change**

As the building sector is particularly exposed to the risks inherent in climate change, Société de la Tour Eiffel is taking steps to identify the sensitivity of its assets to these physical risks, so as to be able to react in the event of significant exposure.

The Société had defined a mapping of acute and chronic climatic risks for all its assets. Since 2021, some twenty adaptation audits have been carried out on its assets; another twenty are planned for 2023. The aim of these audits is to analyze their exposure to the consequences of climate change. The audit reports then contain recommendations which are used as a decision-making tool. The Company's objective is to have its entire real estate portfolio audited.

In addition, crisis management scenarios for natural hazards (flooding, fire) and/or accidental hazards (hydrocarbon leaks and technical installations) are implemented at certified sites only.

For its development projects, the company favours the installation of sunshades or high-performance glazing on buildings at high risk of heat islands.

### **Involving stakeholders in environmental performance**

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, contributing to the mitigation of climate change.

Governance is involved through CSR Committees, and employees are also involved through training/awareness-raising sessions on ESG issues. As for external stakeholders, the company imposes virtuous environmental practices on its suppliers and service providers through the Responsible Purchasing and Supplier Relations Charter and through an assessment of service providers working on construction sites and operating assets. Since 2022, a questionnaire has gradually been sent to service providers to ascertain their ESG practices (196 in early 2023).

Lastly, environmental committees with tenants, held at least once a year, enable us to monitor the environmental actions implemented on the assets concerned, either by the lessor or by the lessees. In addition, this policy is sent to all employees, and made available to tenants on the Kolimmo collaborative platform.

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

The Société de la Tour Eiffel is convinced that the circular economy of buildings is one of the major ways of contributing to climate change mitigation and is stepping up its commitments in this area. Similarly, Société de la Tour Eiffel is aware of the importance of preserving biodiversity in order to maintain the planet's climatic equilibrium.

As part of its development projects, processes have been put in place to promote actions linked to the circular economy, notably through a circular economy study of eligible CAPEX, the estimation of greenhouse gases avoided by the re-use of materials in circular economy operations, and the commitment of several renovation projects to the Re-use Booster. Since 2022, the use of an environmental consultant has been generalized for all Capex on assets in operation.

Actions in favor of the selection of construction and renovation materials have been initiated, for example with the use of low-carbon concrete, or the choice of environmentally-friendly paints from ALGO PAINT, and plant-based glue for carpets. In addition to the rigorous choice of environmentally-friendly materials on its building sites, a clean building site charter is systematically

signed and enforced for all development projects, which are subject to sorting and monitoring of building site waste.

With regard to property under management, Société de la Tour Eiffel has set up partnerships with companies working to optimize waste management (Cy-Clope: recycling of cigarette butts, Greenwishes, Lemon Tri and Cèdre: waste sorting and reporting). Aspiring to assess its environmental impact on a global scale, Société de la Tour Eiffel has systematically carried out a Life Cycle Assessment (LCA) on its construction and restructuring projects since 2022.

Each year, the company aims to progressively reduce water consumption at its operating properties. At the end of 2022, a rational water management policy was also produced for all Tour Eiffel activities (Management, Development, Corporate). Since 2022, the company has been progressively installing meters and sub-meters, and has also launched network audits.

The installation of rainwater harvesting systems is continuing, as is the installation of hydro-economy equipment on Tour Eiffel's buildings. Optimization of building water management is integrated right from the design stage of development projects.

Tour Eiffel is aiming to manage and monitor 100% of its managed buildings before 2024, and is also committed to improving the management and monitoring of construction site waste. Waste sorting is also a corporate practice.

### **Preserving biodiversity**

In 2021, the company launched a sustainable management program for its green spaces, which will be extended in the future. It helps to reduce water consumption on real estate assets and protect the flora and fauna present on assets in general and Business Parks in particular.

In this context, the Group aims to plant projects with local and adapted species, to limit waterproofing and to increase the revegetation of surfaces. This approach should be complemented by a strategy of de-artificializing soils in order to enrich local biodiversity and thus combat its collapse.

### **Continuous improvement of methods**

For over 10 years, Société de la Tour Eiffel has been deploying a voluntary, cross-functional CSR approach that is fully in line with its strategic orientations.

The Company's teams have been working to achieve continuous improvement, as illustrated by the automation of extra-financial data in an evolving IT tool (My Even), which makes CSR reporting more reliable and provides a complete overview of the real estate portfolio (rental status, technical and environmental data, etc.).

The company is committed to deploying a policy of environmental certification for the majority of the assets in its portfolio (target: 80% of real estate assets certified), reflecting its commitment to controlling the impact of its buildings/.

Development projects also aim for "Construction" or "Renovation" certification.

The company's CSR Department is also dealing with Innovation to further move forward on these issues.

The environmental policy is reviewed every year. The CSR & Innovation Director is in charge to implement it under the supervision of the CSR internal committee and that of the specialised Board ESG Committee.

### 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.