

# Echo Investment Group Sustainability Report 2023

Non-financial information statement  
of Echo Investment Group  
Management Board









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# Message from CEO

Nicklas Lindberg

Dear Stakeholders,

It is my pleasure to provide you with the fourth Echo Investment Group Sustainability Report. The document, which summarizes our ESG activities and achievements in 2023, was prepared for the first time in accordance with the new standard introduced by the CSRD.

In 2023, our Group went through organizational changes, including the planned transfer of the entire residential business to Archicom. This evolution required us to analyze and modify our sustainability strategy point-by-point, though keeping ambitious commitments, including our key goal of constructing zero-carbon buildings from 2030.

Our report this year shows the progress we have made over the past years. The data we collect and analyze, cover wider and wider areas related to our operations. Over the past year, we have already managed to reduce our Scope 1 and 2 carbon footprint by 35 percent, and for the first time we are also reporting a Scope 3 carbon footprint, and therefore including CO<sub>2</sub> emissions generated in the Group's value chain. A key environmental issue for us is the decarbonization of our construction process - to this end, we are starting work on our decarbonization strategy as early as 2024.

In the area of social matters, we attach great importance to the development of employees' competencies, their safety (especially at construction sites) and working conditions. We monitor the gender salary gap and reduced it by 4 percent in 2023. We are actively working on further solutions that ensure that the level of employees' remuneration is based solely on competencies, responsibilities and performance.

Considering the aforementioned organizational changes in the Group, corporate governance concerns are of particular importance. In 2023, we implemented a series of activities aimed at strengthening our organizational culture. We have consistently promoted the importance of business ethics through training and promoting our Code of Conduct among employees.

The basis of our reporting, according to the new standard, is the so-called double materiality analysis. This is a study of the company's impact on people and, at the same time, social and environmental trends on its financial standing. It allows us to implement changes in our business model in a thoughtful way that responds to real challenges and expectations of our stakeholders. The feedback we receive by doing so is one of the cornerstones of our operations.

As we implement ambitious development projects that are changing the image of Polish cities, we feel obliged to present a full picture of our operations, resources and goals. For this reason, we are working on even more comprehensive, precise reporting methods in the future.

In the meantime, I encourage you to carefully read our 2023 ESG report.

Sincerely,



# Terms and definitions used

## **Echo Investment Group, Echo-Archicom Group or Group**

- all companies directly and indirectly controlled by a parent company, Echo Investment S.A.

## **Archicom**

- a group of companies consolidated by a parent company, Archicom S.A. It constitutes a residential part of the Echo Investment Group.

## **Echo Investment**

- a part of the Group of companies consolidated by Echo Investment S.A., with the exception of Archicom S.A. and the companies consolidated by it at all levels. A part of the Group engaged in commercial properties.

## **Management Board of the Group or Management Board**

- registered management boards of all Group companies acting collectively or in a similar manner. In particular these are companies Echo Investment S.A. and Archicom S.A., which are employers, organize the Group's business ventures and control its assets.

## **Major, considerable expenses or expenditures**

- expenses or expenditures that are driven solely by the need to report on sustainability matters and are not caused by other factors (such as the development of technologies and a change in the standard expected by clients). In other words: such expenses would not occur if the Group did not report on the sustainability matters. Moreover, the amount of such expenses or expenditures would have to amount to at least 5 percent of the value of the budget assigned to any given issue.

## **Echo-Archicom Group sustainability strategy 2030 or ESG strategy**

- relates to the sustainable development strategy of the two companies. In principle, the strategy is the same.



01

About

us



# Echo Investment Group

ESRS2 BP-1 | ESRS2 BP-2

## Basis of preparation

This Sustainability Report (sustainability statement) applies to the Echo Investment Group, which consists of a parent company Echo Investment S.A., its subsidiaries (directly or indirectly), including Archicom S.A. along with its subsidiaries (directly or indirectly).

## Impact limits

This report covers information on entities and operations for the entire Echo Investment Group. The scope of the information in principle is the same as that of the consolidated financial statements for 2023. The full list of consolidated companies can be found in the Standalone Financial Report of Echo Investment S.A. for 2023.

In terms of social (primarily employee-related) matters, this report presents data on companies consolidated by Echo Investment S.A. using the full method. The Group has some limited control and access to data concerning entities consolidated by the equity method. In addition, these matters will be presented in the reporting of their majority shareholders, and thus a decision to take this approach is in line with the logic of the ESG reporting system (reported data will not be duplicated). For similar reasons, this report does not present information on entities and operations carried out by joint ventures that relate to finished and operating projects - i.e. Galeria Młociny and finished buildings with apartments for rent Resi4Rent. However, it does present data for joint ventures regarding processes over which the Group has control (primarily carrying out constructions).

This report consolidates the Archicom Group's data, which it presented in its separate Archicom Group 2023 Sustainability Report, published on 26 March 2024.

This report also presents a specific range of upstream value chain data. It is primarily about the impact on entities that perform services at construction sites and processes that relate to their organization, operation and supervision.

The Group considers occupational safety and environmental matters to be particularly important in this case. The second major group of subcontractors in the value chain, which impact is presented in the report, are architects, designers, engineers, external lawyers and other

experts who are authorized by the Group to deal with certain institutions and authorities and conduct certain processes (e.g., permits, approvals or administrative and legal matters) on behalf of the Group. In this case, the Group pays attention primarily to matters of ethical cooperation, and this is the scope it presents in the report. This approach was also used in the double materiality analysis.

Details of the presented scope of data in the value chain, its sources and impact, are clearly defined in each case with individual indicators.

The Group has not exercised the option to omit specific information on intellectual property, know-how or results of innovation, (in accordance with ESRS 1 Section 7.7 Classified and sensitive information and information on intellectual property, know-how or results of innovation). The Group did not take advantage of the exemption under Article 19a (3) and Article 29a (3) of Directive 2013/34/EU).

## Special circumstances

The report covers the period from 1 January 2023 to 31 December 2023, which is the same period as the Group's financial year. The material information presented in this report is comparable to the data published in previous reports, unless otherwise stated. Any differences are not significant and are primarily due to a change in the reporting standard. The Group has not identified any material reporting errors in previous periods.

In cases where the Group has chosen to incorporate information by reference in this report, this is in accordance with ESRS 1 Section 9.1 "Incorporation by Reference" and in each case indicates precisely where the required information is included.



# Ruling

ESRS2 GOV-1

## Echo Investment Group's management and supervisory bodies

Below, the Group presents information on bodies of Echo Investment S.A., as it is the parent company that consolidates the entire Group, and its bodies have an impact on the strategy and operations of the entire Group.

### Management Board

The Management Board serves as the executive body. Detailed professional resumes of the individual members of the Management Board, including information on their experience related to the Group's sectors, products and geographic location, can be found in Echo Investment S.A.'s Management Statement on Corporate Governance 2023 (Item 04 Composition and changes in the Management Board), published on the same date as this report.



#### **Nicklas Lindberg**

President of the Management Board, CEO

Knowledge, experience and skills in managing ESG-related matters:

- corporate governance,
- construction site safety,
- corporate impact management,
- diversity and inclusion management: social matters that improve the surroundings of ongoing projects and support community groups in need.



#### **Maciej Drozd**

Vice-President of the Management Board, CFO

Knowledge, experience and skills in managing ESG-related matters:

- corporate governance,
- risk management,
- human resource management,
- construction site safety,
- human rights.



#### **Artur Langner**

Vice-President of the Management Board

Knowledge, experience and skills in managing ESG-related matters:

- corporate governance,
- supply chain management,
- environment protection,
- construction site safety,
- human resource management.



### Rafał Mazurczak

Member of the Management Board

Knowledge, experience and skills in managing ESG-related matters:

- supply chain management,
- construction site safety,
- environmental protection,
- risk management,
- human resource management,
- CSR.



### Małgorzata Turek

Member of the Management Board

Knowledge, experience and skills in managing ESG-related matters:

- corporate governance,
- corporate impact management,
- construction site safety,
- human resource management.

There are no employee representatives or independent members in the Management Board of Echo Investment S.A.

Information on the diversity of the Management Board is presented in Chapter 3 of this report "For people" in ESRS indicator S1-9.



## Supervisory Board

The Supervisory Board serves as the non-executive body. Detailed professional resumes of individual members of the Supervisory Board, including information on experience related to sectors, products and geographic location of the Group, can be found in Echo Investment S.A.'s Management Board's Statement on the Application of Corporate Governance 2023 (Item O6 Composition and changes in the Supervisory Board), published on the same date as this report.





## Noah M. Steinberg

Chairman of the Supervisory Board

Knowledge, experience and skills in managing ESG-related matters:

- corporate governance,
- corporate impact management,
- risk management,
- human resource management (including: diversity and inclusion),
- supply chain management (value chain creation),
- environment protection.



## Tibor Veres

Vice-Chairman of the Supervisory Board

Knowledge, experience and skills in managing ESG-related matters:

- corporate governance,
- corporate impact management,
- risk management,
- supply chain management (value chain creation),
- environment protection.



## Margaret Dezse

Independent Member of the Supervisory Board

Knowledge, experience and skills in managing ESG-related matters:

- **corporate governance:** participation in supervisory and governing bodies of numerous entities, as a representative of EY, PwC, and as an independent expert, involved in assessing competence and filling key directorships and partner candidates; establishing remuneration policies, promoting and supporting corporate values, code of conduct, and processes for anti-corruption, independence assessment and conflict of interest assessment;
- **risk management:** holding board and management positions at EY and PwC, she was involved in this area in day-to-day activities, including risk assessment and mitigation, support in preparing and implementing policies, and promoting corporate culture. Engaged in this area also as a member of management boards of various companies;
- **human resource management:** as a Partner at EY and PwC, she managed her own teams, participated in personnel decisions, and built organizational structures, taking into account aspects of diversity, equal working conditions and remuneration structure, among others. In 2022, she participated in a conference for members of the CPA Canada Member Panel Discussion on equality, diversity and inclusion. She is also a certified coach at EY;
- **supply chain management:** in 2023, she participated in a presentation for members of CPA Canada called "Connecting ESG Reporting Standards with the Reality of Supply Chains";
- **other activities:** a member of the Board of Directors and Audit Committee of a social organization United Way Hungary, Impact Ventures, a pro-social fund, and an independent member of the advisory committee of the UN World Food Programme.



## Maciej Dyjas

Member of the Supervisory Board

Knowledge, experience and skills in managing ESG-related matters:

- **corporate governance:** during his career, he has honed a comprehensive knowledge of corporate governance principles, which are also necessary in the context of the ESG management. His expertise is related to roles and responsibilities of management boards, committees and top management;
- **risk management:** with hands-on experience in transactions, he has detailed knowledge of risk management, with a particular focus on identifying and advising on risks. Maciej's strategic insight allows him to respond to changing governance landscape and adapt organizations to ESG imperatives;
- **human resource management:** holding many top management positions, he has played a key role in hiring and building teams, contributing significantly to the growth and success of various organizations.



## Sławomir Jędrzejczyk

Independent Member of the Supervisory Board

Knowledge, experience and skills in managing ESG-related matters:

- **corporate governance:** preparation and implementation of data reporting processes to the Supervisory Board and financial and accounting processes, creation and implementation of the Code of Ethics, creation and monitoring of CSR policies and budgets;
- **human resource management:** staffing of key positions in companies, assessment of competencies, promotions and employee remuneration policies;
- **corporate impact management:** managing finances and analyst and shareholder relations, organizing project standards and quality, improving the efficiency of business operations;
- **supply chain management** (value chain management).



## Péter Kocsis

Member of the Supervisory Board

Knowledge, experience and skills in managing ESG-related matters:

- corporate governance,
- risk management,
- human resource management (including: diversity and inclusion),
- environment protection.



### Bence Sass

Member of the Supervisory Board

Knowledge, experience and skills in managing ESG-related matters:

- risk management,
- human resource management (including: diversity and inclusion).



### Nebil Şenman

Member of the Supervisory Board

Knowledge, experience and skills in managing ESG-related matters:

- **corporate governance:** Nebil has a broad, global perspective on guiding companies through the complex landscape of corporate governance from an ESG perspective. His in-depth understanding of regulations and industry best practices helps him make strategic decisions to create long-term value while promoting environment management and social responsibility;
- **sustainable finance:** experienced in sustainable finance and corporate responsibility, thus he plays a key role in ensuring that companies' operations are in line with the highest ethical standards and sustainable development;
- **corporate impact management:** specialized in building strong relationships with various stakeholders, from shareholders to regulators, promoting transparency and accountability of companies;
- **human resource management:** as a member of Supervisory Boards he evaluates key managers and directors. He has played a key role in hiring a significant number of highly qualified professionals in various companies, which has contributed to their growth.

## Echo Investment S.A. Supervisory Board diversity by dependency [in percents]

	as of 31 December 2022	as of 31 December 2023
Dependent	75%	75%
Independent	25%	25%
Other (e.g., employee representative)	0	0
Total	100%	100%

Information on the diversity of the Supervisory Board is presented in Chapter 3 of this report "For people" in ESRS indicator S1-9.

## General Meeting of Shareholders

In 2023, the General Meeting of Shareholders did not make any decisions or review any matters related to the Group's sustainability and ESG.





# Management structure for ESG matters

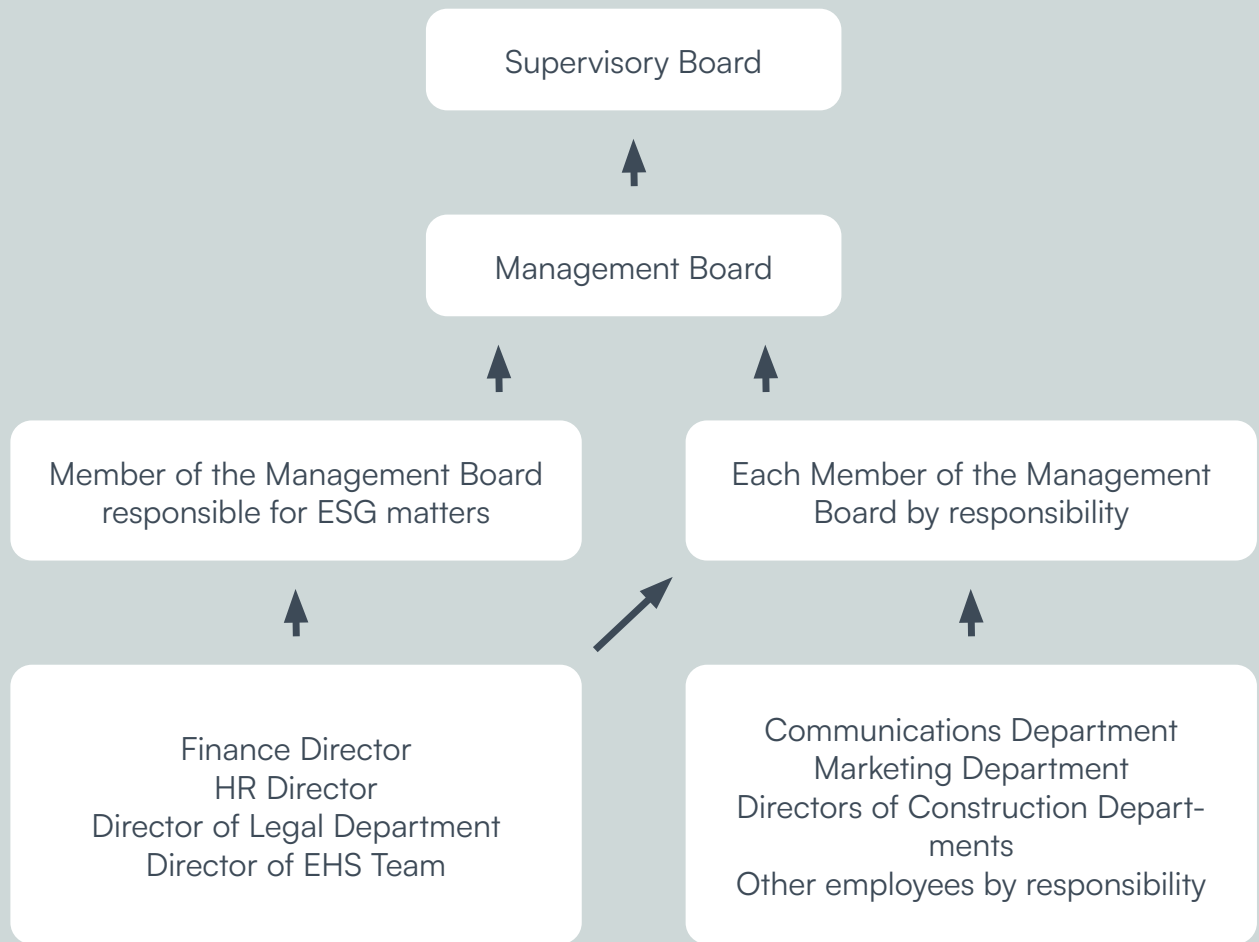
ESRS2 GOV-2

ESG, sustainability and impact management matters are integrated into the Group's business strategy and its goals for each year. The Management Board usually analyzes these topics in the context of conducting business and expects employees to report on the most important matters consistently. ESG, sustainability and impact management topics are addressed together with business and strategic matters, using the same channels, i.e., through ongoing analysis, reports and thematic meetings (periodic and special), meetings of the Management Board, quarterly project reviews, during visits at construction sites.

## Key impact management matters that are reported to the Management Board

Impact scope	Responsibility
Implementation of the Sustainability Strategy	Rafał Mazurczak (Member of the Management Board) for Echo Investment and Waldemar Olbryk (CEO of Archicom) for Archicom
Employees of the Group	HR Director
Construction site workers	EHS Team, construction site managers
Environmental matters directly related to projects under construction	Department of Architects, Construction Department, EHS Team
Environmental management standards at construction sites	EHS Team
Relations with neighbors of construction sites	Construction managers, Marketing Departments, Communications Department
Establishment and consultation of legal solutions related to the Group's activities	Employees delegated to work with particular industry organizations, Legal Department
Human rights	Legal Department, HR Director

## Group's impact management structure



### Responsibility of the Management Board related to impact management

- development and adoption of the Sustainability Strategy,
- monitoring the implementation of the Sustainability Strategy,
- approval of additional ESG, sustainability strategies and policies and impact, if arising from the Group's day-to-day management,
- ensuring that the Group's operations comply with legal requirements,
- determining the Group's ESG, sustainability and impact priorities, goals and objectives,
- setting responsibilities and enforcing performance,
- any other tasks and responsibilities arising from the law, the Articles of Association of Echo Investment S.A. and other corporate documents of the Group.

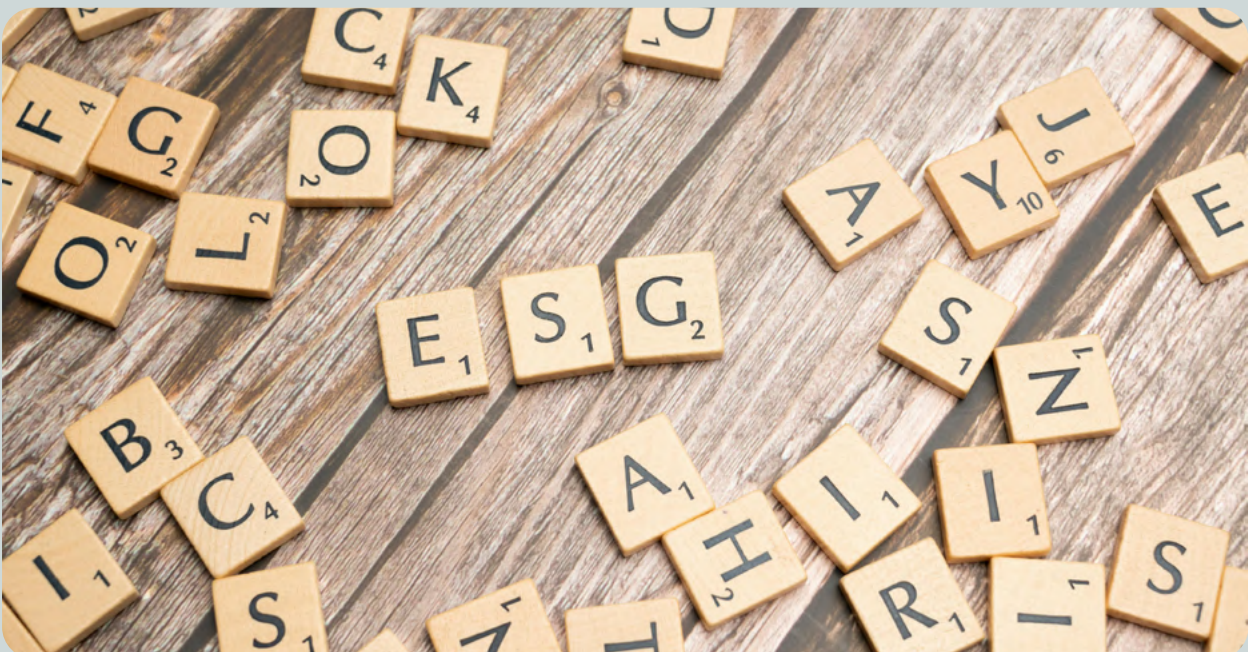
### Responsibilities of the Supervisory Board related to impact management

- tracking the implementation of the Sustainability Strategy,
- approval of additional ESG, sustainability and impact strategies and policies, if it results from universal powers and responsibilities of the members of the Supervisory Board,
- any other tasks and responsibilities arising from the law and the Articles of Association of Echo Investment S.A.

## Fostering knowledge and awareness of ESG issues' importance in the Management Board

Due to growing awareness of sustainability matters, as well as ESG requirements from regulators, banks and potential counterparties, the Management Board of the Group has been devoting more and more attention to reporting, data collection and analysis, as well as implementation of the ESG strategy.

1. The Management Board has all necessary knowledge and skills in corporate and project management, in terms of legal, accounting, technical and financial matters. This allows it to effectively manage ESG, sustainability and impact management matters and requirements.
2. Sustainability matters (including the strategy) were a topic discussed at six meetings of Echo Investment's Management Board and top management (Management Team) in 2023.
3. Members of the Management Board were involved in the creation of the Echo Investment Group's ESG strategy and adopted it.
4. The Management Board and senior managers took part in a presentation and discussion on annual OHS performances at construction sites, and furthermore on audit results regarding compliance of Echo Investment's EHS Management System with ISO 14001 and ISO 45001 standards (ISO has not yet been implemented at Archicom). At the same time, an awareness training was held, which was attended by all members of the Management Boards of Echo Investment S.A. and Archicom S.A.
5. Selected members of the Management Board, senior management representatives and the HR team participated in the annual audit of the EHS management system (at Echo Investment).
6. Every member of the Management Board and senior management in 2023 participated in at least eight Executive Site Safety Visits (ESSVs) - construction site inspections for health and safety. This is one of collective annual goals.
7. Members of the Management Boards of both companies participated in the Safety Week - a nationwide campaign to promote awareness of dangers at construction sites.
8. Members of the Management Board and senior management participated in ESG training sessions on carbon footprint counting and reduction, as well as CSRD reporting requirements.
9. Each member of the Management Board has full access to the expertise of the Group's employees and experts in specific fields (ESG, sustainability, compliance management).
10. Each member of the Management Board, within the scope of their duties and responsibilities, has the opportunity to benefit from the expertise of external experts and professionals in ESG, sustainability and compliance management. In this regard, in 2023 the Group relied on the support of specialized entities, including Deloitte, Sapere, Climate Strategies Poland Foundation, Polish Chamber of Commercial Real Estate (PINK), CBRE, JLL and others.





## Fostering knowledge and awareness of ESG issues' importance in the Supervisory Board

1. The Supervisory Board is equipped with all necessary knowledge and skills in business and project management, with legal, accounting and financing expertise. This allows it to effectively supervise matters and requirements for the Group related to ESG, sustainability and impact management.
2. Sustainability and ESG reporting matters were topics discussed at two Supervisory Board meetings in 2023.
3. Members of the Supervisory Board were engaged by the Management Board in giving their opinion on the 2023 adopted Group's sustainability strategy.
4. Each member of the Supervisory Board has full access to the expertise of employees of the Group and experts in specific fields (ESG, sustainability, compliance management).
5. The Supervisory Board, as part of its duties and responsibilities, has the opportunity to benefit from the knowledge of internal experts in ESG, sustainability and compliance management. The Group does not provide any external training or opportunities to supplement the Supervisory Board members' ESG knowledge.

### Material impacts, risks and opportunities managed by the Management Board, Supervisory Board or their respective committees in 2023

#### Management Board

1. Discussion and adoption of the Group's Sustainability Strategy,
2. Discussion and adoption of the Group's strategy to reduce greenhouse gases (GHG) emissions,
3. Sustainability reporting requirements under the CSRD,
4. Importance of the EU taxonomy and its possible impact on the Group's operations.

#### Supervisory Board

1. Required ESG reporting standards,
2. Assessment of the Group's readiness for mandatory ESG reporting,
3. Assessment of the Group's readiness to correctly collect data for ESG reports.

## Reporting

Risks and ESG priorities are communicated to the Management Board (and, in the case of major events and matters, to the Supervisory Board) as part of business reporting and using its tools:

- working group meetings (periodic and ad hoc),
- individual meetings on specific matters,
- quarterly project review,
- quarterly meetings of the Audit Committee,
- systems for reporting project and financial data.

For more information on the Group's management of ESG matters and supervision of reporting, please see ESRS2 GOV 5 disclosure below.

## Sustainability-related incentive schemes for Group's bodies

A variable part of remuneration for members of the Management Board and top management depends on the degree of achievement of group goals set annually (concerning the entire Management Board), as well as individual goals. Among the goals may be matters related to sustainability (such as a certain number of EHS visits at construction sites - Executive Site Safety Visit). The Management Board's goals are set and reviewed together with the Supervisory Board.

One of the primary goals of the Remuneration Policy of the Management Board and Supervisory Board of Echo Investment S.A. is to implement the business strategy, long-term interests and stability of the Company and the Group, which, according to the Group, also includes an element related to sustainability matters. However, the remuneration system for the Management Board and Supervisory Board does not explicitly include sustainability matters.

In 2023, the goals of the Management Boards of Echo Investment and Archicom included completing eight ESSVs at construction sites, and selected members were to analyze opportunities to increase the energy efficiency of building with apartments for sale and rent as well as office buildings.

The Group does not apply financial incentives linked to sustainability matters to members of the Supervisory Board. The remuneration of the Supervisory Board members is determined and approved by the Company's General Meeting of Shareholders.



## Due diligence

The Group's sustainability due diligence process is not systematized. In key matters, the Group operates by following the due diligence mechanism and its methodology indicated in the OECD Due Diligence Guidance for Responsible Business Conduct.

In particular, the Group applies these solutions in areas shown in the double materiality study as significant, i.e:

- Environmental protection and rational use of resources at construction sites (climate change, energy and water consumption, waste),
- Employees (own and in the supply chain - at construction sites),
- Communities (neighbors, clients and users),
- Business ethics.

## Distributed due diligence process elements and their disclosures in this report

Due diligence process basic elements	Disclosures	ESRS indicators
Integration of due diligence into governance, strategy and business model	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Whistleblowing procedure</li> <li>• Anti-Corruption Code</li> <li>• Health and Safety Policy</li> <li>• Environmental policy</li> <li>• Remuneration policy</li> <li>• Sustainability strategy</li> <li>• Other codes and procedures of governance corporate</li> </ul>	<ul style="list-style-type: none"> <li>• GOV-1, GOV-2, GOV-3</li> <li>• SBM-1: Strategy, business model and value chain</li> <li>• MDR-P: Policies adopted to manage material sustainability matters</li> </ul>
Cooperation with impacted stakeholders at all key stages of the Group's due diligence process	<ul style="list-style-type: none"> <li>• Identification of key stakeholders</li> <li>• Dialogue with employee representatives</li> <li>• Ethics training for employees</li> <li>• Providing suppliers with information on key aspects of implemented policies (extranet)</li> <li>• Dialogue with stakeholders of major projects</li> </ul>	<p>SBM-2: Interests and views stakeholders</p> <ul style="list-style-type: none"> <li>• Indicators related to SBM-2 in thematic standards (S1, S2, S3, S4)</li> </ul>
Identification and assessment of adverse impacts (Item 2)	<ul style="list-style-type: none"> <li>• Value chain mapping process as part of the double materiality process</li> <li>• Identification of impacts as part of the double materiality process</li> <li>• Other processes for identifying impacts within business operations (e.g., processes for evaluating suppliers, whistleblowing channels)</li> </ul>	<p>IRO-1 — Description of the process to identify and assess material impacts, risks and opportunities</p> <ul style="list-style-type: none"> <li>• Indicators related to IRO-1 in thematic standards (E1, E2, E3, E4, E5, G1)</li> </ul>
Undertaking measures to reduce any identified adverse impact (Item 3)	<ul style="list-style-type: none"> <li>• Introduction of registration of complaints and their handling</li> <li>• Introduction of changes to designs of projects as a result of a dialogue with stakeholders</li> <li>• EHS training courses</li> <li>• Periodic, random controls of the system's operation by the internal audit department</li> </ul>	<p>MDR-A: Actions and resources in relation to material sustainability matters</p>
Monitoring the effectiveness of these efforts and providing relevant information in this regard (Item 4, 5)	<ul style="list-style-type: none"> <li>• Procedure for handling complaints at construction sites</li> <li>• Reporting to the Management Board of information on irregularities and their handling (under the procedure for reporting irregularities)</li> <li>• Monthly reporting of EHS matters at construction sites to the Management Board</li> <li>• Ethics exam results</li> <li>• Annual Sustainability Report and its communication to employees</li> <li>• Continuous tracking of the progress of the Sustainability Strategy implementation</li> </ul>	<p>MDR-T — Tracking effectiveness of policies and actions through targets</p>



## Internal control and risk management processes related to ESG reporting

The Management Board of Echo Investment S.A. is responsible for the overall impact and risk management in the Echo Investment Group, in cooperation with the Supervisory Board and the Audit Committee.

The Management Board, with the support of directors and managers in charge of individual departments, oversees the risk management process by creating, implementing and analyzing systems and control procedures corresponding to identified risks. The process is supported by the Internal Audit Department, which evaluates the functioning of the risk management and internal control system and the effectiveness of the control procedures in place that address significant risks.

The Management Board of the Echo Group is also responsible for managing the impact and overseeing the Sustainability Strategy and integrating ESG criteria into the overall business strategy (in short, medium and/or long term) and as part of the overall risk management.

In particular, Waldemar Olbryk, CEO of Archicom S.A., is responsible for ESG matters in the Archicom Group, while Rafał Mazurczak, Member of the Management Board of Echo Investment S.A., is responsible for ESG matters in Echo Investment. Their tasks primarily include supervising the implementation of the Group's Sustainability Strategy to 2030. The Group's ESG reporting is the responsibility of Mateusz Frey, Echo Investment's Financial Director, supported by the ESG team led by Anna Strożek, Stock Exchange & ESG Communications Manager.

At the Echo Investment Group, the responsibility for managing ESG impacts and risks is delegated to units and teams, managing operational matters that are related to this impact. This arrangement of responsibilities makes it possible to manage business matters and impact at the same time, which, according to the Management Board and taking into account past experiences, makes it possible to respond quickly and flexibly to needs.

Individual responsibilities related to the impact management, combined with the corresponding business operations, are under the authority of members of the Management Board, whose task is to provide overall monitoring of risks.

Risks rated as low (low chance of occurring and low impact on the overall business) are managed at the level of managers and directors. Medium risks are managed with the participation of a relevant member of the Management Board, while high risks, which can have a high impact on the business as a whole, are managed at the level of the President and the entire Management Board. The President, the Management Board and the directors discuss current risks and how to manage them in regular sessions or meetings. The topic of risks is also discussed at meetings of the Audit Committee and the Supervisory Board. The reporting is done as needed on an ongoing basis.

The Group's impact, risk and opportunity management uses standardized controls and procedures. As a result, the impact, risk and opportunity reporting area is integrated with other internal functions, and its reporting is part of the Group's ongoing reporting of business results. The Group's detailed management principles are described in "Echo Investment Management Board Statement on the Corporate Governance Principles 2023".

The administrative, management and supervisory bodies and top management oversee the setting of goals related to material impacts, risks and opportunities as part of the Group's regular setting of business goals. This usually takes place once a year. The progress of goals is monitored by the Management Board through ongoing analysis, reports and meetings, at Management Board's meetings, quarterly meetings with employees responsible for achieving business goals (known as project reviews), or through mandatory inspections of construction sites (involving the Management Board, senior management, the EHS team, project managers, among others). In this way, the Group's Management Board is able to assess the progress of the implementation of the Sustainability Strategy, identify risks, new responsibilities and requirements, etc. In addition, ESG-related reporting is supported by the ESG flow information system underway.

## Reporting control system

The process of risk management and internal control over ESG reporting is not separated in the Group. These matters are managed within existing methods and processes, used primarily to manage and control business and financial processes. These include:

- advanced accounting systems, systems for business reporting and a workflow system for documents and processes,
- the system for collecting data ESG flow that has been developed since 2023,
- transparent financial procedures, compliance,
- a well-established and transparent organizational structure,
- competence, knowledge and experience of those involved in the internal control process,
- supervision of the system by managers, and regular assessment of the Group's activities,
- verification of financial statements by an independent auditor,
- operation of the internal audit department.

### Major identified risks (the Group's priorities in risk management and internal control) in terms of ESG and mitigation methods

Risks - priorities	Risk management methods
Risk of non-compliance with minimum legal and regulatory requirements	<ul style="list-style-type: none"> <li>• Constant review of the Group's requirements by its own legal team</li> <li>• Cooperation with reputable ESG advisors</li> <li>• Delegation of qualified employees to deal with specific ESG matters (reporting, introduction of tools, verification of activities, competitive analysis)</li> <li>• External training, trade shows and industry events</li> <li>• Constant monitoring of communications from regulatory institutions and the specialist press</li> </ul>
Risk of non-compliance with ESG expectations of key business partners and clients	<ul style="list-style-type: none"> <li>• Constant analysis of requirements of clients'and competitors</li> <li>• External training, trade fairs and industry events</li> <li>• Cooperation with the industry through business organizations, trade fairs, chambers, etc.</li> <li>• Exchange of knowledge within the Group and as part of industry associations, chambers and organizations</li> </ul>
Risk of incompleteness and inaccuracy of data presented	<ul style="list-style-type: none"> <li>• Introduction and development of specialized systems for collecting necessary ESG data (ESG flow)</li> <li>• Analysis of collected data (comparison to analogous periods, other projects, information from other systems)</li> <li>• Cooperation with reputable ESG advisors</li> <li>• Auditing of ESG reports by an independent auditor since 2025</li> </ul>
Risk of unavailability of value chain data at a lower level	<ul style="list-style-type: none"> <li>• Direct supervision by the Group of key environmental and OSH processes at construction sites</li> <li>• Updated standards of cooperation with subcontractors and suppliers</li> <li>• Repetitive cooperation with contractors</li> <li>• Standardized contractual provisions and requirements</li> </ul>

Prioritizing of ESG risks is carried out by means of the following:

1. The regular periodic evaluation of the functioning of the risk management and internal control system and evaluation of the effectiveness of the control procedures in place that address significant risk factors - conducted by the Director of the Internal Audit Department, in cooperation with the Management Board and the Audit Committee;
2. The double materiality analysis;
3. The analysis of current information and events from the company (whistleblowing reports, identified system gaps, new legal requirements).

# Group's business segments

ESRS2 SBM-1

The Echo Investment Group is a property development group with extensive experience in main sectors of the real estate market: residential, office and retail/ service. Many years of experience in various market segments gives the Group a competitive advantage, resulting from its ability to develop large, mixed-use and city-forming "destinations" projects - places that are good for living, working and leisure. We create projects that fit into and complement the urban fabric.

## Main business segments and characteristics of their clients

### Apartments for sale

After the Group's reorganization in 2023, they are developed and offered by the Archicom Group.

#### Clients

Individual investors buying apartments for their own needs or for investment purposes.

### Apartments for rent

In this segment, the Group offers project management and construction management services (as a substitute investor).

#### Clients

Resi4Rent - one of the largest private companies managing apartments for rent in Poland. Echo Investment is a co-investor in Resi4Rent, holding 30 percent of its shares.



**2 122**

apartments handed over to clients



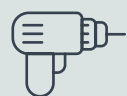
**4 089**

permises under construction



**1 835**

apartments sold



**7 722**

premises in the pipeline



**4 106**

apartments managed



**1 109**

apartments put on offer in 2023



**6 082**

premises under construction and in the pipeline



## Office buildings

Being developed by Echo Investment.

### Clients

This offer is for two types of clients:

1. Companies looking for a place for their usual offices, typically large and medium-sized companies, both Polish and with foreign capitals. A large part of them are companies from the BPO/SSC sector.
2. Large investment funds that buy finished and leased office buildings in order to earn from their lease and increase in value.

## EUR 45 mln

value of the sale transaction of the Moje Miejsce II office building in Warsaw (17 000 sqm)

## 40 000 sqm

total area finished, prepared and handed over to tenants

## 31 100 sqm

space under construction in Office House as part of the Towarowa 22 project in Warsaw

## 41 600 sqm

space under construction in Swobodna SPOT in Wrocław

## Serviced offices

The offer, which in the Group is provided by CitySpace.

### Clients

Serviced offices are used by the following types of clients:

1. Medium and large companies that view a serviced office as a solution for short-term projects or temporary - for example, until they are provided with a target, traditional office space.
2. Small companies, often sole proprietors, experts and specialists.

## 3 411

total number of workstations on offer of CitySpace

## 13

locations in the CitySpace portfolio in **6** cities: Warsaw, Wrocław, Kraków, Katowice, Gdańsk and Łódź

## 2 000 sqm

space of CitySpace in the Fuzja project, the first such concept in Łódź, opened in the second quarter of 2023

## 1 400 sqm

space of CitySpace in MidPoint71 in Wrocław, opened in Q3 2023

## 29 100 sqm

total flexible office space of CitySpace

## Shopping centers, retail spaces

Owned and managed by Echo Investment. (The Group does not have plans to build shopping centers in the near future).

### Clients

1. Retail and service chains that lease areas to their establishments.
2. Large investment funds that buy finished and leased shopping centers in order to profit from their lease and increase in value - a profile similar to buyers of office buildings.

### Libero shopping center

**+14%**

turnover rate y/y

**+9%**

footfall rate y/y

### Galeria Młociny shopping center

**+12%**

turnover rate y/y

**+4%**

footfall rate y/y

**20**

number of lease agreements with restaurants, cafes, service outlets or local stores signed by the food&beverage team since the beginning of 2023





## Services

First and foremost, investor substitution, construction management, consulting, accounting, marketing, etc.

## Clients

The Group provides such services primarily to related parties (Towarowa 22, Galeria Młociny, Resi4Rent), and in rare cases also for third-party entities (e.g., Student Depot).

The Group does not sell products or services that are banned in certain markets, subject to concerns from stakeholders or public debate.

In 2023, there were no significant changes in the Group's products, services or client categories.





## Sales revenue of the Group by segment [PLN '000]

Segment	2022	2023
Apartments	1 109 627	1 293 422
Resi4Rent apartments for rent	16 873	35 409
Commercial properties (office buildings, retail spaces, shopping centers, CitySpace)	267 806	244 462
<b>Total</b>	<b>1 394 306</b>	<b>1 573 293</b>

The segment division is presented in line with the methodology of presentation in the consolidated financial statements. It is due to business characteristics, differences and similarities in accounting principles.

## Consolidated financial data of the Echo Investment Group [PLN '000]

	2022	2023
<b>Data for the period from 1 January 1 to 31 December</b>		
Sales revenue	1 394 306	1 573 293
Operating profit	275 403	180 695
Net profit attributable to shareholders of the parent company	127 150	67 428
Net cash flows from operating activities	9 184	-274 784
Net cash flow from investment activities	584 836	-106 951
Net cash flows from financing activities	-240 703	253 574
Total net cash flows	353 317	-128 161
<b>Balance as of 31 December</b>		
Total assets	6 087 012	5 961 838
Long-term liabilities	1 962 076	2 116 182
Short-term liabilities	2 318 624	1 817 567
Equity attributable to shareholders of the parent company	1 643 778	1 690 053
Number of shares	412 690 582	412 690 582
Book value per share	3.98	4.10



# Company history

1996

Echo Investment starts a residential development business in Kielce and debuts on the Warsaw Stock Exchange. The company's founder is an entrepreneur from Kielce Michał Sotowow.



1997

We start construction of new projects in the office sector and we establish a strategic partnership with Accor, for which we will build 16 hotels across the country in the next few years.

2009

We sign a loan agreement worth EUR 100 mln for the expansion of Galeria Echo in Kielce. This is the first significant financial agreement in the Polish real estate sector after the outbreak of the global crisis, which convinced other companies and banks of the stability of this branch of the economy.

2011

We received the prestigious MAPIC Awards for the best expanded shopping center in Europe - Galeria Echo in Kielce.



1999

We enter a new business segment - shopping centers. To date, the Group has built 33 shopping centers as well as retail and entertainment centers in 25 Polish cities.

2012

We celebrate putting into service the 100th project in our history. It is the Aquarius Business House office building in Wrocław.

2015

A consortium of PIMCO, Oaktree and Griffin Real Estate funds takes an ownership stake in Echo Investment.

2019

A controlling stake in Echo Investment is being acquired by a Hungarian real estate company Wing.

2018

Together with a financial partner, we start the construction of Resi4Rent - the first private company renting apartments in Poland, which is today a leader in this rapidly growing market.

2017

We enter top ten residential developers in Poland, having sold more than 1,400 apartments.

2016

Nicklas Lindberg is appointed CEO. The Echo Investment Group adopts a new strategy, according to which it will focus on real estate development activities in Poland, intends to build large, urban projects, maintain its leading position in all segments, in which it operates, and pay regular dividends.

2020

We complete the construction of the Warsaw Breweries, the first mixed-use, city-forming "destinations" project.

2022

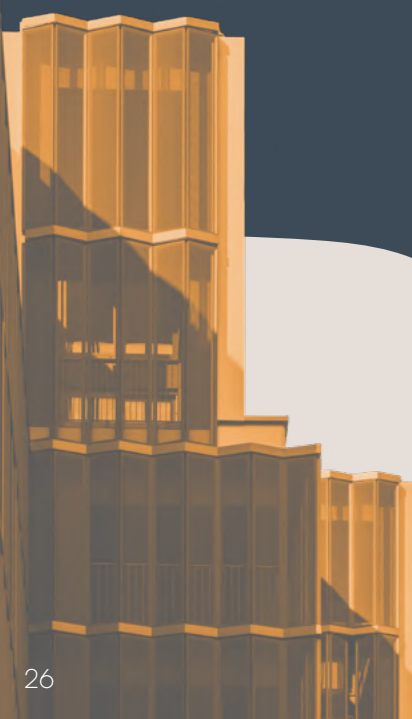
We attract a reputable partner, AFI Europe, to work on the Towarowa 22 project.

2021

Echo Investment acquires a controlling stake in Wrocław-based residential developer Archicom.

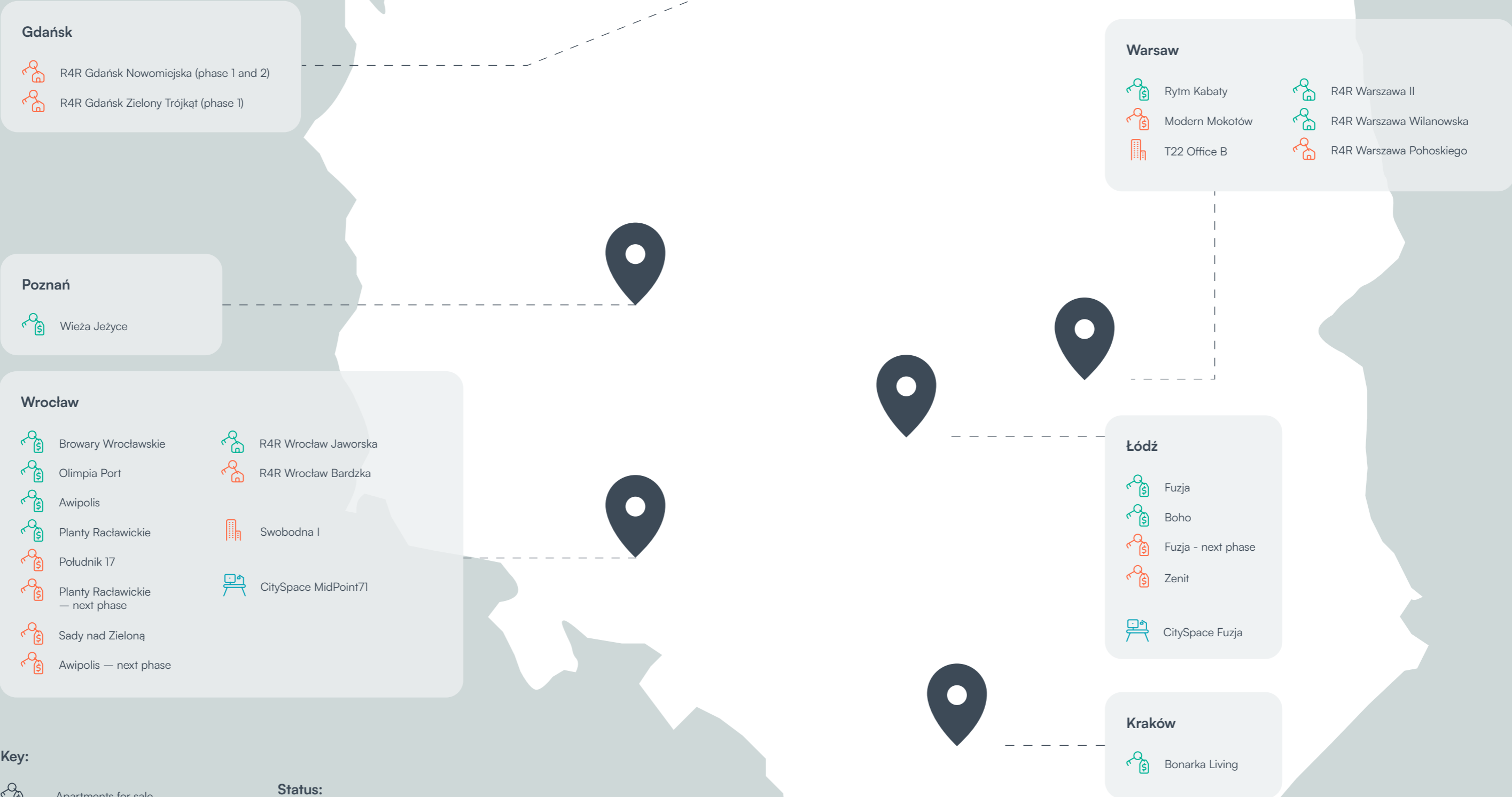
2023

We transfer the Echo Investment Group's separate residential business to Archicom, which has cleaned up the Group's structure and gave Archicom a nationwide scale with stronger growth potential, synergies and wider market recognition.



# Our property portfolio

as of 31 December 2023



**Key:**

- Apartments for sale
- Resi4Rent apartments for rent
- Offices
- CitySpace flexible offices

**Status:**

- finished in 2023
- started in 2023
- opened in 2023



# Group's business location

The Group is engaged in development activities in seven major Polish cities, which are also the most attractive and most liquid real estate markets.



In 2023, there were no significant changes in the markets covered by the Group.

## Division of employees with employment contracts by place of work

Province	Number of employees
the Świętokrzyskie province	210
the Dolnośląskie province	174
the Mazowieckie province	155
the Małopolskie province	31
the Łódzkie province	25
the Wielkopolskie province	23
Others	13
<b>Total</b>	<b>631</b>

# 2030 Echo-Archicom sustainability strategy

On 28 March 2023, the Echo Investment Group announced the 2030 Echo-Archicom ESG Strategy on actions taken at both companies in the areas of environment protection, social engagement and responsible management.

It is a phased road leading the Group to decarbonization, zero-emission of projects under construction, further increasing the role of greenery in projects, and supporting sound urban development. The two companies also intend to ensure equal development opportunities for their employees, maximize the safety at construction sites and strengthen corporate governance.

The strategy is divided into three blocks corresponding to environment (E), society (S) and corporate governance (G). All the stated goals are in line with the UN Sustainable Development Goals, and are specific and measurable.

In connection with carrying out organizational changes and meeting some of the goals, in 2024 the Group will revise its ESG Strategy to adapt it to a new structure and revised tasks.

## Sustainability goals of the Group in relation to products, clients and stakeholder relations

The Group's main goals stem from the Echo-Archicom Group's Sustainability Strategy 2030, adopted in 2023.

Category	Area	Goal
Concerning products and clients	E - environmental	2026 — all finished buildings managed by the Group, own offices, CitySpace offices and construction sites will use green energy
		2030 — all buildings developed by the Group will be zero-emission
Concerning relations with stakeholders	S - social	2023-2030 — zero fatalities at construction sites
		2023 - development and implementation of a system for handling complaints from construction sites' neighbors
		2025 — introduction of a system for measuring employee satisfaction at construction sites and setting goals
		2027 — women and men will occupy 45-55 percent of key director positions
		2026 — average number of unused leave days will be no more than 10
		2027 — implementation of high standards of social facilities at construction sites
		achieving a balance in pay between employees of different genders in similar (in scope and responsibility) positions
		50 percent of projects delivered as part of large, multi-phase "destinations" projects

Concerning relations with stakeholders

G — corporate governance

2023 — putting ESG matters on the agenda of Management and Supervisory Boards

2023 - introduction of mandatory 4 ethics internal communication materials

2023-2030 — 100 percent of employees trained in ethical principles

The Group assesses that its main sustainability goals in relation to products, significant markets and client groups, is achievable within accepted time and organizational frameworks.

## Profitable growth strategy pillars and their impact on sustainability matters

The Management Board of Echo Investment, in consultation with the Supervisory Board, prepared and implemented the "Profitable Growth Strategy" in 2016. In strategic directions confirmed in 2020, the Group places particular emphasis on growth in the residential sector and increases the importance of its mixed-use, large-scale "destinations" projects.

### Leadership position

The Echo Investment Group is the largest property development group in terms of the number and area of finished projects, operating in major Polish cities. It is active in the residential and commercial real estate segments. The profitable growth strategy assumes that the Group will be among the leading developers in both residential and commercial segments, which implies a higher growth rate in the residential segment. The large scale of operations allows for optimal utilization of resources.

### Impact

- As a large and powerful entity, the Group can impact industry standards, create trends, and promote sustainable development activities.
- Ability to utilize knowledge, experience and skills of a large number of specialists and internal experts, sharing knowledge among the Group's companies and projects.
- Ambitions to become a leader not only in the scale of business conducted, but also its quality.





## Large-scale, mixed-use projects

The Group's long-standing experience in the three real estate sectors gives it a competitive advantage derived from its ability to develop large, mixed-use and city-forming projects. This allows the Group to buy larger areas with lower unit prices and the competition of buyers is much lower. Combining functions allows for faster completion of projects and comprehensive urban design.

### Impact

Large-scale projects that combine functions have a positive impact on the shaping of urban space and on matters such as optimal use of land and other resources, coherent development, designing to reduce motor traffic, and the possibility of designing larger and more attractive green spaces.



## Property development activities

The Group focuses on property development activities: purchasing plots of land, obtaining administrative permits, project preparation, obtaining financing, construction, rental and sale of finished projects. The Group's main source of profits comes from sales of apartments and the increase in value of commercial properties being built. Most of the group's assets are residential and commercial properties under construction.

### Impact

Due to the nature of its business, the Group emphasizes ethical business conduct (the issue of dependence on administrative decisions, settlements and other decisions of public authorities) and environmental issues (in managing construction sites).

## Poland

It is the most economically strong country and the real estate market in Central and Eastern Europe. The Group is well aware of its potential, realities and operating principles. We focus on developing projects in the country's seven most important cities, which are also the most attractive and liquid real estate markets: Warsaw, Wrocław, Kraków, the Tri-City, Poznań, Katowice and Łódź.

### Impact

No significant impact identified.



## Cooperation with proven partners

The Group appreciates long-term business relationships with proven partners that create synergies for both parties. The Group's property development activities are complementary to those of these entities. Such collaboration facilitates the expansion of the scale of business, accelerates the execution of projects and reduces risks. The Group invests jointly with its partners in projects that require greater financial commitment, provides them with services (property development, planning, leasing, accounting, etc.) and provides priority in purchasing finished assets at arm's length. All significant agreements between the Group and its partners, are discussed and approved by the Supervisory Board.

### Impact

- The Group runs property development projects and has joint ventures with several entities. This makes it easier to assess the ethical performance of a given partner and is supported not only by declarations, but sometimes by long-term collaboration. This reduces the risk of cooperation with unreliable partners.
- Since there may be potential ties (personal, capital) with certain business partners, the Group is at risk of conflict of interest in this case. Therefore, the cooperation with such business partners and significant transactions are subjected to careful analysis by the Supervisory Board.

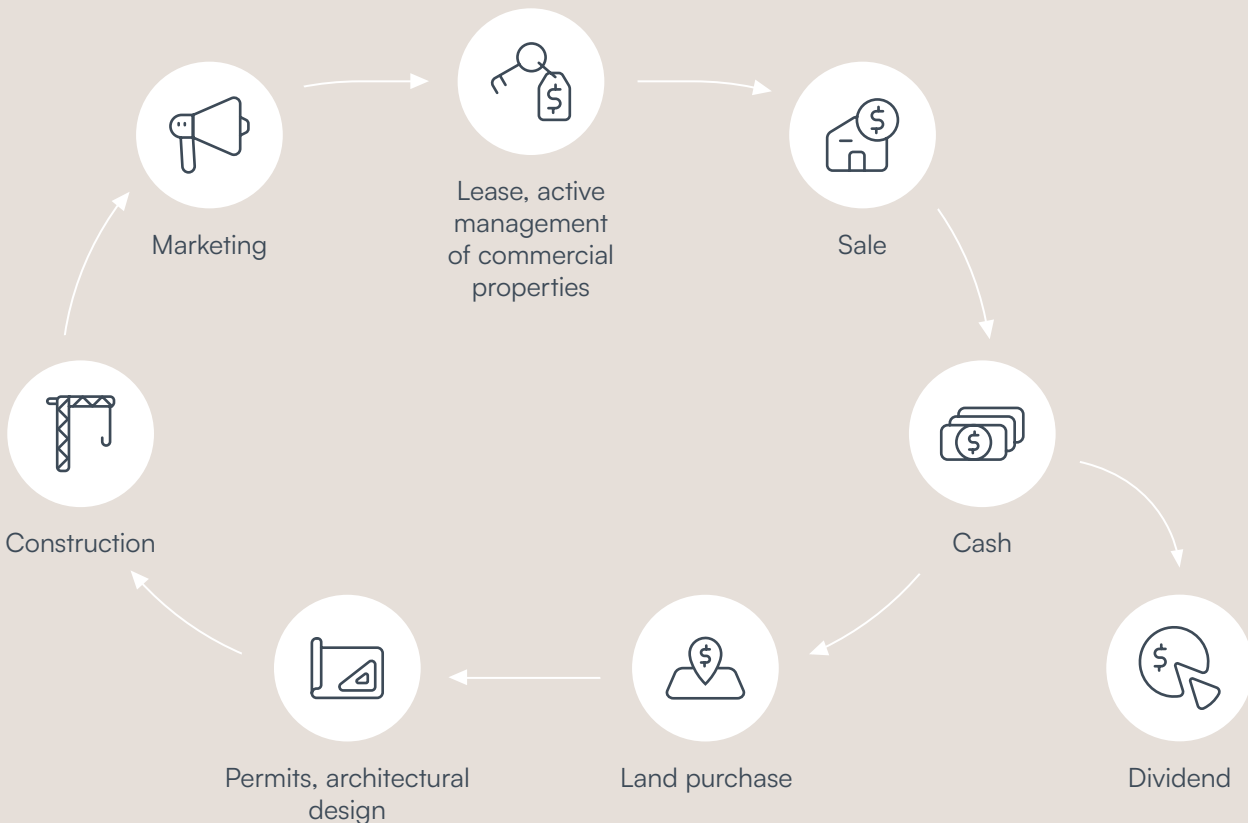
# Business model and value creation chain

The Echo Investment Group is the only entity in the Polish market that has experience and competence in building, leasing and selling in the main sectors of the real estate market.

## Business model

The Group's business model is based on a fast movement of cash - from purchasing a plot of land, to building, leasing and selling a given property at the optimal time in terms of the expected rate of return. Such a model gives the Group the flexibility to adapt to market changes. Because the business cycles of different real estate sectors run differently and are vulnerable to different risks, the Group steers its day-to-day investment policy and staffing in such a way as to limit exposure to weaker sectors and maximize operations in the most promising ones.

The Echo Investment Group organizes the entire real estate project investment process. We find and buy attractively located plots of land, obtain relevant permits, create architectural design and manage construction. While the construction is still underway, we conduct marketing activities, sell apartments or lease commercial properties. After the completion, office buildings and shopping centers are actively managed by us in order to achieve a maximum value, and then sold. We use the profits earned in this way for regular dividend payments and further developments.



# Value chain

## CONTRIBUTION

### Financial capital

- equity
- financing acquired
- external (loans and bonds)
- PLN 942 million - cash balance

### Human and intellectual capital

- own employees
- persons performing work for the Group
- external experts' work
- own IT systems

### Organizational and production capital

- PLN 6.1 billion - Group's assets
- services purchased (design, construction)
- investment areas purchased
- processes and procedures

### Social capital

- trust of clients and business partners
- cooperation with shareholders and banks
- employee loyalty
- compliance with legal requirements

### Upstream entities in the value chain

- vendors of land plots (companies and natural persons)
- providers of design and planning services (architectural firms, experts)
- providers of construction services (larger and smaller general construction and specialized companies)
- providers of capital (banks)
- providers of specialized services (marketing, analysis, building maintenance)
- suppliers of utilities (water, electricity)
- agents and brokers acting on behalf of the Group

## BUSINESS MODEL



## RESULTS

### Operational

- 1 835 apartments sold
- 2 212 apartments handed over to clients
- 3 buildings with 1109 apartments for rent transferred to Resi4Rent
- sale of the Moje Miejsce II office building in Warsaw for EUR 45 million
- 40 000 sqm of space finished, prepared and handed over to office tenants
- 3 400 sqm increase in office space offered to clients by CitySpace
- 14% and 12% increase in the turnover of the Libero shopping center in Katowice and Galeria Młociny in Warsaw, respectively, compared to 2022

### Financial

- PLN 182 million paid to shareholders by way of dividends
- increase in value of individual Group's properties
- PLN 74 million - total value of remuneration paid to employees (gross, employment contracts)
- PLN 670 thousand - total value of investments in training and upgrading employees' skills

### Downstream entities in the value chain

- individual clients purchasing apartments
- office tenants (large and medium-sized companies, BPO and SSC sectors)
- tenants of commercial spaces (retail chains, restaurants, specialty stores and others)
- users of CitySpace premises (small businesses, often sole proprietors, medium and large companies waiting for their target spaces)
- funds and other entities specializing in managing commercial properties - buyers of finished office buildings and shopping centers
- agents and brokers acting on behalf of potential tenants or buyers

## OUTCOMES

### Financial capital

- PLN 2 billion - amount of equity
- PLN 67 million - net profit
- PLN 814 million - cash balance

### Human and intellectual capital

- increase in qualifications and knowledge of employees
- improvement of efficiency and quality of own IT systems

### Organizational and production capital

- PLN 6 billion - assets of the Group
- PLN 357 million - acquired properties securing the Group's growth
- strengthening the Group's corporate governance and resilience

### Social capital

- acquisition of new clients and business partners
- increase in the level of trust and understanding of clients and business partners
- improvement in the level of loyalty and satisfaction of employees
- PLN 13 million - total value of paid property tax and tax on civil law transactions



# Value chain diagram and placement of the Group in it

## Upstream

- Suppliers of raw materials (e.g., mines, industrial forests)
- Manufacturers of construction materials (e.g., cement plants, timber companies, brick factories)
- Suppliers of components and products (e.g., concrete, steel, windows, bricks)
- Construction companies (various specializations and sizes)



## Group

Business operations of the Echo Investment Group



## Downstream

Buyers of finished properties

- Individual clients buying apartments
- Companies (funds, Resi4Rent)



## Downstream

Tenants of finished properties

- Retail chains
- Companies looking for an office
- Small and medium-sized companies looking for flexible office space



# Group's key stakeholders

Stakeholder	Method of cooperation	Frequency of contacts	Purpose of cooperation	Considering the results of cooperation
Shareholders	<ul style="list-style-type: none"> <li>periodic reports and current reports,</li> <li>press releases,</li> <li>regular meetings with analysts and representatives of shareholders,</li> <li>presentations,</li> <li>General Meeting of Shareholders.</li> </ul>	<ul style="list-style-type: none"> <li>according to financial reporting schedules,</li> <li>according to the schedule announced (GMS),</li> <li>as needed on an ongoing basis.</li> </ul>	<ul style="list-style-type: none"> <li>building trust in the Group and its bodies,</li> <li>stimulating the Group's valuation on the WSE,</li> <li>obtaining approval and confirmation of strategic directions taken,</li> <li>fulfilling legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>implementation of strategic decisions of the Group's GMS,</li> <li>taking directions from shareholders and their representatives in creating the Group's policies,</li> <li>adapting data reporting and presentation to shareholders' needs</li> </ul>
Employees	<ul style="list-style-type: none"> <li>cooperation with employee representatives (elected by the entire workforce),</li> <li>procedure for handling whistleblowing reports,</li> <li>intranet,</li> <li>newsletters,</li> <li>thematic e-mailings,</li> <li>posters,</li> <li>discussions with managers and HR representatives,</li> <li>employee opinion surveys,</li> <li>team-building meetings,</li> <li>workshops and training sessions.</li> </ul>	<ul style="list-style-type: none"> <li>on an ongoing basis,</li> <li>according to the schedule of significant events for employees in the Group,</li> <li>when onboarding an employee to work at the Group,</li> <li>as needed on an ongoing basis.</li> </ul>	<ul style="list-style-type: none"> <li>retaining competent and committed personnel within the Group,</li> <li>developing the Group's potential by building employee competencies,</li> <li>ongoing monitoring of potential irregularities and gaps in the Group's management system,</li> <li>meeting legal requirements.</li> </ul>	<ul style="list-style-type: none"> <li>including employee representatives' voices in strategic and operational processes</li> <li>requiring their participation,</li> <li>adjusting training topics to meet expressed requests,</li> <li>responding to current reported topics (when justified).</li> </ul>

<p>Employees of subcontractors at construction sites</p>	<ul style="list-style-type: none"> <li>ongoing cooperation with the Group's construction management team,</li> <li>regular construction site briefings,</li> <li>regular meetings and visits of the EHS Team,</li> <li>OSH visits of the Management Board and top management (ESSVs),</li> <li>bulletin boards,</li> <li>workshops and training.</li> </ul>	<ul style="list-style-type: none"> <li>on an ongoing basis,</li> <li>at the start of a new phase of work (onboarding),</li> <li>as needed on an ongoing basis.</li> </ul>	<ul style="list-style-type: none"> <li>establishing clear rules of cooperation,</li> <li>reducing risks - including those related to health and safety and environment protection.</li> </ul>	<ul style="list-style-type: none"> <li>training programs for employees at construction sites,</li> <li>corrective actions in justified cases.</li> </ul>
<p>Individual clients (buyers of apartments)</p>	<ul style="list-style-type: none"> <li>face-to-face meetings in sales offices and occasionally at construction sites,</li> <li>phone calls,</li> <li>communication via a contract management system (CRM),</li> <li>participating in residential trade fairs,</li> <li>client satisfaction surveys,</li> <li>website and other online channels (Facebook, LinkedIn, Instagram),</li> <li>conferences, events marketing, training.</li> </ul>	<ul style="list-style-type: none"> <li>according to the schedule of significant events related to the purchase of an apartment (reservation, contracts, handovers, formal and legal actions),</li> <li>on an ongoing basis,</li> <li>occasionally (invitations to events, surveys, etc.).</li> </ul>	<ul style="list-style-type: none"> <li>sales of apartments,</li> <li>building the Group's reputation through word-of-mouth marketing and referrals.</li> </ul>	<ul style="list-style-type: none"> <li>adapting to clients' needs throughout the residential sales process (in terms of contractual provisions, tenant changes, pricing policies, etc.),</li> <li>building the Group's future residential portfolio, taking into account clients' needs.</li> </ul>
<p>Institutional clients (tenants, buyers of finished properties)</p>	<ul style="list-style-type: none"> <li>face-to-face meetings,</li> <li>phone calls and videoconferences,</li> <li>marketing materials, brochures and prospectuses for brokers and agents,</li> <li>participation in trade fairs, conferences and industry-events.</li> </ul>	<ul style="list-style-type: none"> <li>occasionally - during industry events, meetings with agents and marketing of a particular property,</li> <li>according to the schedule of significant events related to a building sale transaction or a lease agreement,</li> <li>on an ongoing basis during operations and the duration of warranty service.</li> </ul>	<ul style="list-style-type: none"> <li>selling a building or leasing a unit,</li> <li>building a relationship that can result in further transactions in the future,</li> <li>establishing clear rules and communication channels for after-sales service.</li> </ul>	<ul style="list-style-type: none"> <li>adapting to the needs of customers throughout the process of selling a building or renting premises (in terms of contractual and legal provisions, management, etc.),</li> <li>building the Group's future offer, taking into account the comments made by customers,</li> <li>dealing transparently with after-sales service or disputes that arise.</li> </ul>



<p>End users (employees of tenants, visitors to properties or projects) and local communities within projects</p>	<ul style="list-style-type: none"> <li>• communication and marketing materials,</li> <li>• project websites and its social media channels,</li> <li>• events organized by the Group,</li> <li>• press releases,</li> <li>• public consultations,</li> <li>• web applications.</li> </ul>	<ul style="list-style-type: none"> <li>• during preparation and administrative work (at the stage of design and consultation),</li> <li>• according to the marketing schedule established for a given property,</li> <li>• on an ongoing basis during operation.</li> </ul>	<ul style="list-style-type: none"> <li>• promoting the Group's projects,</li> <li>• stimulating the footfall and turnover of restaurants and service outlets,</li> <li>• managing local community needs and expectations.</li> </ul>	<ul style="list-style-type: none"> <li>• commercial and non-commercial offer taking into account feedback from visitors,</li> <li>• modifying plans and management to avoid local conflicts.</li> </ul>
<p>Subcontractors, suppliers and other business partners</p>	<ul style="list-style-type: none"> <li>• ongoing communication as part of cooperation,</li> <li>• contractual provisions,</li> <li>• Code of Conduct,</li> <li>• procedure for handling whistleblowing reports,</li> <li>• standards and valid cooperation rules (made available via extranet),</li> <li>• meetings, conferences and industry events.</li> </ul>	<ul style="list-style-type: none"> <li>• during contract negotiations,</li> <li>• on a weekly basis during construction site briefings,</li> <li>• on an ongoing basis during construction,</li> <li>• occasionally (industry events, surveys, etc.).</li> </ul>	<ul style="list-style-type: none"> <li>• establishing transparent rules of cooperation and clearly indicating expectations,</li> <li>• promoting the highest EHS standards to avoid accidents and environmental damage that generate project costs,</li> <li>• monitoring the correctness of the cooperation system and any irregularities that increase the risk of delays or additional costs.</li> </ul>	<ul style="list-style-type: none"> <li>• modifications to the construction management system, if justified,</li> <li>• training programs for construction workers.</li> </ul>
<p>Media</p>	<ul style="list-style-type: none"> <li>• a spokesperson,</li> <li>• a company website (special subpage),</li> <li>• channels in social media,</li> <li>• interviews, press releases,</li> <li>• ongoing relations with journalists,</li> <li>• press conferences,</li> <li>• interviews.</li> </ul>	<ul style="list-style-type: none"> <li>• on an ongoing basis,</li> <li>• in case of significant events in the Group,</li> <li>• in case of industry events or events of significance to the industry, sector or the economy as a whole.</li> </ul>	<ul style="list-style-type: none"> <li>• promoting the Group's good public image,</li> <li>• avoiding reputation crises, reducing their impact or leveling their effects.</li> </ul>	<ul style="list-style-type: none"> <li>• modification of message, content or quality.</li> </ul>
<p>Industry organizations</p>	<ul style="list-style-type: none"> <li>• cooperation as part of industry or business organizations,</li> <li>• cooperation on industry initiatives,</li> <li>• exchange of information,</li> <li>• personal relations of employees,</li> <li>• cooperation on social projects.</li> </ul>	<ul style="list-style-type: none"> <li>• on an ongoing basis,</li> <li>• in case of industry events or events of significance to the industry, sector or the economy as a whole.</li> </ul>	<ul style="list-style-type: none"> <li>• influencing decision-makers, legislation and industry regulations,</li> <li>• sharing knowledge and experience.</li> </ul>	<ul style="list-style-type: none"> <li>• adjusting the Group's operations to established industry standards,</li> <li>• applying knowledge and experience gained to the Group's management.</li> </ul>

The Group's Management Board is responsible for the Group's strategy and business model, acting in close consultation with the Supervisory Board in this regard, and submitting fundamental matters to the review of the General Meeting of Shareholders. In terms of its strategy and business model, the Group considers Shareholders (through the Supervisory Board and the General Meeting of Shareholders) as key stakeholders, and takes their opinions fully into account in its operations. The Group does not study opinions of other stakeholders in terms of strategy and business model and does not take them into account.

The Group's strategy and business model were adopted in 2016 and the Group has not modified them since then. The Management Board is kept informed of opinions and interests of affected parties that refer to the Group's sustainability-related activities.

The Management Board is informed of opinions and interests of affected parties that refer to the Group's activities related to sustainable development, if this information is significant from the point of view of supervising the Group and its business.

For more information on how the Management Board and Supervisory Board are informed, see ESRS GOV2 and GOV5 indicators above.



ESRS2 SBM-2 linked to ESRS S1-8

## Employee consultation on strategy and business model impact

The Group's Management Board does not consult with employee representatives, or directly with employees, on matters of the strategy and business model. The Group recognizes that the Management Board, whose responsibilities include ensuring stable and effective personnel management, is responsible for the strategy and business model.

All strategic processes in the Group involve the HR Director and his voice - as a representative of employees - is taken into account in strategic decisions. His task is to assess the impact of planned decisions on employees and to present their perspective to the Management Board - especially if the matters are related to the strategy and business model and have a direct, significant impact on employee matters, including - they create a risk for the respect of human rights. In 2023, such a situation occurred during organizational changes in the Group - the transfer of residential projects and employees responsible for them from Echo Investment to Archicom. The HR Director was responsible for creating new, effective structures in both entities, as well as for ensuring that all employee rights were respected.

The rules of operation, method of election, number, competence and activities of employee representatives in 2023 are described in detail in Chapter 3 of this report ("For people"), in ESRS S1-2 and ESRS2 SBM-2 indicators.

The Group is not party to any global framework agreements or other agreements with employee representatives regarding the respect of human rights for its own employees. The Group's business model and strategy are based on its operations in different segments of the real estate market, which tend to have different business cycles and dynamics. In addition, the Group's employee management policy promotes the cooperation of people with different competencies, the exchange of knowledge and the flexibility of employees to take on tasks from new areas. This approach reduces the risk of sudden organizational changes and deterioration of working conditions.





# Topics relevant to the Echo Investment Group due to the double materiality analysis

ESRS2 SBM-3

Issue on impacts, risks and opportunities	Materiality assessment	Impact on people or environment	Current and anticipated effects	Response and evaluation time perspective	Current financial effects
<p><b>ESRS E1 Climate change. Adaptation to climate change - implementing adaptation solutions.</b> The material impact is concentrated at the design stage (own operations and hired architects - the upstream of the value chain).</p>	<p>Impact materiality: high Financial materiality: high</p>	<p><b>The impact is positive, potential.</b> The introduction of adaptive solutions in projects depends solely on activities undertaken by the Group.</p>	<p>It may result in an increase in the time needed for the design stage. It will result in modifications to internal standards, contracting system and qualification criteria for subcontractors and suppliers. It does not affect the strategy, business model and value chain.</p>	<p>Changes implemented systematically due to greater interest from potential clients or business partners, as well as greater legal requirements. The pace of response is steadily increasing, but the Group does not anticipate major problems in adjusting. Planned changes in contracting.</p>	<p>No significant financial outlay. Changes are being made systematically, which will result in higher expenditures in the future. The Group is not yet able to estimate the financial impact.</p>
<p><b>ESRS E1 Climate change. Climate change mitigation - taking action towards the reduction of GHG emissions from scope 1 and 2.</b> The material impact is concentrated in the Group's own operations - energy consumption for the needs of its own employees, as well as the energy consumption of unleased parts of finished commercial buildings.</p>	<p>Impact materiality: very high Financial materiality: high</p>	<p><b>The impact is positive, existing.</b> The Group began calculating and reporting emissions in 2023. In accordance with the Sustainability Strategy, it will adopt reduction targets. The responsibility of the Group only.</p>	<p>It will result in a reduction in the number of business partners from which electricity or certificates of origin can be purchased. It does not affect the strategy, business model, value chain or decision-making process.</p>	<p>The Group contracts electricity mainly with assurance of renewable energy sources or a certificate of origin. Beginning in 2024, the purchase of electricity for own consumption is limited to green energy only.</p>	<p>The 2023 analysis of the cost of purchasing electricity showed that purchasing green energy is less than 10 percent more expensive than purchasing standard energy.</p>
<p><b>ESRS E1 Climate change. Climate change mitigation - GHG emissions from projects (Scope 3).</b> The construction industry's high carbon intensity is related to the obtaining and processing of construction raw materials and the use of finished buildings (Scope 3). The Group adopted the goal of "Reduction of product CO<sub>2</sub> emissions - facilities under construction" in its ESG 2030 Strategy. It plans to measure reference buildings (office, residential and apartments for rent) and set reduction targets. The risk is focused on the construction phase - the upstream of the value chain.</p>	<p>Impact materiality: high Financial materiality: high</p>	<p><b>The impact is negative, existing.</b> The Group in 2024 will begin analysis of reference buildings for reducing GHG emissions. Requiring changes is the responsibility of the Group, actual actions - in subcontractors.</p>	<p>It results in restricting the use of certain products or suppliers that do not meet certain standards. It does not affect on the strategy, business model and value chain.</p>	<p>The Group is systematically introducing restrictions on permitted products or suppliers, but only in the future - after a thorough analysis of reference buildings - it will be able to introduce more significant restrictions. In 2026, it will introduce a decarbonization strategy for Scope 3.</p>	<p>No significant outlays identified. The estimate for the future depends on the outcome of the analysis of pilot projects. The Group is not yet in a position to estimate the financial impact.</p>

<p><b>ESRS E1 Climate change. Energy - energy consumption in buildings being put into operation.</b></p> <p>Both new and existing buildings will have to meet high standards of energy efficiency. They should be characterized by low (zero) energy demand thanks to adequate insulation of partitions, efficient ventilation, cooling and heating, and energy management. They should also be equipped with energy-generating facilities, allowing them to become energy positive. The risk is concentrated at the stage of using finished buildings - at the downstream of the value chain.</p>	<p>Impact materiality: very high Financial materiality: high</p>	<p><b>The impact is negative, existing.</b> The negative rating is due to the fact that at this stage the problem of energy loss cannot be completely avoided. In 2024, the Group will start to analyze reference buildings in terms of improving energy intensity. The responsibility of the Group only.</p>	<p>Achieving zero-carbon buildings will not affect the strategy, it may affect the supply chain. The issue has not yet been analyzed.</p>	<p>The Group begins to analyze the pilot buildings and will only be able to determine the time horizon after the pilot. According to the ESG strategy, the conclusions of the pilot will be available and implemented from 2026.</p>	<p>The Group is not yet able to estimate the financial impact.</p>
<p><b>ESRS E1 Climate change. Energy - energy consumption in own operations and at construction sites.</b></p> <p>The issue relates to energy consumption of own offices (Kielce, Warsaw, Wrocław), finished buildings and construction sites. The impact of the issue concerns both the upstream of the value chain (construction sites), own operations and building operations (the downstream of the value chain).</p>	<p>Financial materiality: high</p>	<p><b>The impact is positive, existing.</b> The Group has set a timetable for transitioning to green energy in its Sustainability Strategy. It also introduces solutions to support energy efficiency in buildings. The possibility of taking actions depends solely on the Group.</p>	<p>The issue has a small impact only on energy purchasing decisions.</p>	<p>The Group contracts electricity mainly with assurance of renewable energy sources or a certificate of origin. The Group is gradually introducing the purchase of green energy for its own use, for finished projects, for CitySpace offices and at construction sites</p>	<p>The analysis of the cost of purchasing electricity conducted in 2023 showed that it is more expensive to purchase green energy than to purchase standard energy by less than 10 percent.</p>
<p><b>ESRS E1 Climate change. Energy - the use of energy-efficient solutions and product alternatives for commercial buildings.</b></p> <p>At the design stage, solutions that reduce the demand for primary energy are taken into account, if it is necessary to replace materials/solutions at the construction stage - the replacements are agreed with designers, so that they still allow to maintain the designed PE rate. All commercial buildings are certified to include such solutions. The impact of the issue primarily concerns the design stage (own operations).</p>	<p>Impact materiality: very high Financial materiality: high</p>	<p><b>The impact is positive, existing.</b> The impact is positive, existing. The possibility of taking actions depends solely on the Group and the validity of energy solutions.</p>	<p>The issue only affects design and purchasing decisions. It does not affect on the strategy, business model and value chain.</p>	<p>The schedule has not been determined. It will be the result of analysis of pilot projects after 2026.</p>	<p>The Group is not yet able to estimate the financial impact.</p>
<p><b>ESRS E1 Climate change. Energy - use of energy-efficient solutions and product alternatives for residential buildings.</b></p> <p>The issue depends on the use of technical solutions that reduce energy consumption. Current market trends do not support their use, so only about half of the Group's projects implement them. The risk relates to own operations (design), but has practical significance in the operation of buildings (the downstream of the value chain).</p>	<p>Financial materiality: high</p>	<p><b>The impact is negative, existing.</b> Due to high purchase prices of apartments, clients pay more attention to current apartment prices than to operating costs: market requirements counteract the introduction of costly energy-saving solutions. The responsibility is solely on the Group's side.</p>	<p>The issue only affects design and purchasing decisions. It does not affect on the strategy, business model and value chain.</p>	<p>The schedule has not been determined. It will result from the analysis of pilot projects after 2026.</p>	<p>The Group is not yet able to estimate the financial impact.</p>

<p><b>ESRS E3 Water and marine resources. Water - consumption reduction at the stage of using commercial premises.</b></p> <p>The issue depends on the use of technical solutions that reduce energy consumption. Current market trends do not support their use, so only about half of the Group's projects implement them. The risk relates to own operations (design), but has practical significance in the operation of buildings (the downstream of the value chain).</p>	Impact materiality: high	<p><b>The impact is positive, existing.</b> The Group introduces solutions to save water consumption (appropriate infrastructure), even though it does not directly affect on the functioning of end users. The opportunity used in its own operations, although the beneficiaries are end users.</p>	It does not affect the strategy, business model, value chain and decision-making process.	n/a.	No significant financial impact.
<p><b>ESRS E4 Biodiversity and ecosystems. Direct drivers of biodiversity loss - removal of trees from project sites.</b></p> <p>The Group's strategy limits tree removal by focusing on projects within the limits of urbanization. However - even with appropriate design - the tree removal is usually necessary before construction begins. This is due to the design (own operations).</p>	Impact materiality: high	<p><b>The impact is negative, existing.</b> The Group has some tools to reduce tree removal (e.g., purchase of vacant land), although they are ineffective from a business perspective. Repairing the damage involves compensation activities. The Group's responsibility.</p>	It does not affect the strategy, business model, value chain and decision-making process.	Voluntary compensation activities introduced starting in 2023.	No significant financial impact.
<p><b>ESRS E4 Biodiversity and ecosystems. Direct factors affecting the loss of biodiversity - plantings and protection of existing tree plantings.</b></p> <p>The Group's ESG 2030 Strategy adopted goals of ensuring adequate replacement of removed trees and introducing a guide for maintaining existing trees during the design and construction phases. The Group conducts tree management in accordance with environmental decisions. In addition, it introduced guidelines for protecting trees at construction sites. These measures introduce responsibilities in own operations (proper design and tree management) as well as for contractors (the upstream level of the value chain).</p>	Impact materiality: very high	<p><b>The impact is positive, existing.</b> The growing awareness and increasing use of tools to protect trees comes from the Group's gradual tightening of requirements for designers and subcontractors, who are also partly responsible. The assumed compensation measures result from the ESG strategy and are well above the required minimum.</p>	It does not affect the strategy, business model, value chain and decision-making process.	Voluntary compensation activities introduced starting in 2023.	No significant financial impact.
<p><b>ESRS E5 Closed loop economy. Waste - segregation of waste at construction sites.</b></p> <p>Although the obligation to segregate construction waste will take effect from 2025, the Group has already introduced this obligation in 2021 on its own construction sites. The data disclosed is at an overall level (with no segregation of waste types). The impact on contractors (the upstream in the value chain).</p>	Impact materiality: high	<p><b>The impact is positive, existing.</b> The source of waste is subcontractor operations. Improvements in segregation results from the Group's tightening of requirements and providing support to subcontractors - including know-how.</p>	Tightening criteria and expectations of subcontractors may result in the abandonment of cooperation with those who are unable to meet requirements. It does not affect the strategy, business model and value chain.	Implemented from 2021, gradually increasing requirements every year.	No significant financial impact.



<p><b>ESRS S1 Own employees. Working conditions - long term employment stability.</b> The Group offers stable employment mainly based on employment contracts of indefinite duration. In addition, it compares favorably with a high average length of service, which for 2023 was 7 years.</p>	Impact materiality: very high	<b>The impact is positive, existing.</b> It results from a purposeful action by the Group, and concerns the Group's own employees.	The employment stability of personnel ensures that the Group continues to conduct business, retains core competencies within the Group. It does not affect the strategy, business model, value chain and decision-making process.	It results from the Group's value and a long-standing approach to managing employees. No planned changes.	No significant financial impact.
<p><b>ESRS S1 Own employees. Working conditions - conducting dialogue with employees.</b> It concerns practices of cooperation and informing own employees.</p>	Impact materiality: high	<b>The impact is positive, existing.</b> It results from a purposeful action by the Group, and concerns the Group's own employees.	It does not affect the strategy, business model, value chain and decision-making process.	It results from the Group's value and a long-standing approach to managing employees. No planned changes.	No significant financial impact.
<p><b>ESRS S1 Own employees. Working conditions - work-life balance.</b> It applies to the work practices used, as well as additional work-life balance activities - with regard to its own employees.</p>	Impact materiality: high	<b>The impact is positive, potential.</b> The Group analyzes feedback from employees on an ongoing basis.	It does not affect the strategy, business model, value chain and decision-making process.	It results from the Group's value and a long-standing approach to managing employees. No planned changes in policy. Planned activities aimed to increase the utilization of outstanding leave by employees.	No significant financial impact.
<p><b>ESRS S1 Own employees. Equal treatment and opportunities - low diversity in management and supervisory positions.</b> It applies to the Management Board and Supervisory Board.</p>	Impact materiality: very high	<b>The impact is negative, existing.</b> The ability to act (change the composition of the bodies) is partly outside the Group and belongs to its shareholders. The Group supports and encourages them to increase diversity - including through its ESG strategy assumptions.	It does not affect the strategy, business model, value chain and decision-making process.	In accordance with EU requirements, by mid-2026 women will constitute a minimum of 40 percent on the Supervisory Boards of each company, or a minimum of 33 percent on the Supervisory Board and Management Board combined.	No significant financial impact.
<p><b>ESRS S1 Own employees. Equal treatment and opportunities - training and skills development.</b> The Group conducts a wide variety of employee training and annual development interviews that also include people with contracts other than employment contracts. Employee surveys raised questions about insufficient training in areas other than health and safety.</p>	Impact materiality: high	<b>The impact is positive, existing.</b> The Group invests in the development of its own employees, and pays special attention to safety and building a culture of cooperation.	It does not affect the strategy, business model, value chain and decision-making process.	It results from the Group's value and a long-standing approach to managing employees. Any changes in the approach will result from the Group's current business needs.	No significant financial impact.

<p><b>ESRS S1 Own employees. Equal treatment and opportunity - measures to prevent violence and harassment at work.</b> A number of policies and activities in the area of preventing undesirable actions apply to own employees and result from actions of the Group.</p>	<p>Impact materiality: very high</p>	<p><b>The impact is positive, existing.</b> It applies to its own employees.</p>	<p>It does not affect the strategy, business model, value chain and decision-making process.</p>	<p>It results from the Group's value and a long-standing approach to managing employees. No planned changes.</p>	<p>No significant financial impact.</p>
<p><b>ESRS S2 Workers in the supply chain. Occupational health and safety - health and life hazards for workers at construction sites.</b> The construction industry is characterized by a high accident rate. The Group has a system of solutions in place to minimize the risk of danger to health and life of workers at construction sites, but this risk cannot be eliminated, and the possible effects are impossible to reverse. The risk exists only at construction sites (the upstream in the value chain).</p>	<p>Impact materiality: high Financial materiality: high</p>	<p><b>The impact is negative, potential.</b> It applies primarily to employees of subcontractors at construction sites, as well as a certain group of their own employees who work at construction sites.</p>	<p>It does not affect the strategy, business model, value chain and decision-making process.</p>	<p>It results from the Group's value and a long-standing approach to managing employees. No planned changes.</p>	<p>The significant financial impact in case of an accident depends on its scale and circumstances. According to the 2022 report by Ayming Poland and the Business Centre Club, a severe accident at work on average costs a company PLN 1.2 million (compensation, production downtime, replacements, administrative penalties).</p>
<p><b>ESRS S2 Workers in the supply chain. Occupational health and safety - a well-functioning health and safety system.</b> The construction industry is characterized by a high accident rate. The Group has a system of solutions in place to minimize the risk of danger to health and life of workers at construction sites, but this risk cannot be eliminated, and the possible effects are impossible to reverse. The risk exists only at construction sites (the upstream in the value chain).</p>	<p>Impact materiality: very high Financial materiality: high</p>	<p><b>The impact is positive, potential.</b> It applies primarily to employees of subcontractors at construction sites, as well as a certain group of their own employees who work at construction sites.</p>	<p>It does not affect the strategy, business model, it is included in the value chain and decision-making process - primarily in terms of qualification to work with specific subcontractors.</p>	<p>It results from a multi-year approach to managing the safety of workers at construction sites. It is planned to develop systematically in companies of the Group.</p>	<p>The Group adopted the following goals in its ESG 2030 Strategy: zero fatal accidents at construction sites and ensuring high standards of welfare facilities at construction sites. The system consists of training, reporting, verification of reports and implementation of improvements. The system is validated by international certifications. No significant financial impact.</p>
<p><b>ESRS S3 Affected communities. Economic, social and cultural rights of communities - city-forming function.</b> The creation of multi-phase, urban projects is a pillar of the Group's business strategy and is reflected in the ESG strategy. It influences own operations (land acquisition and design).</p>	<p>Impact materiality: high</p>	<p><b>The impact is positive, existing.</b> Building large urban mixed-use projects is part of the Group's business strategy. Its implementation is driven solely by the Group's own operations.</p>	<p>It does not affect the strategy, business model, value chain and decision-making process.</p>	<p>In line with the Group's ESG strategy, city-building projects (so-called "destinations") will account for a significant part of the project portfolio from 2023.</p>	<p>No significant financial impact.</p>

<p><b>ESRS S4 Clients and end users. Personal safety of clients or end users - creating safe spaces.</b> Due to the large scale of interference with cities through its projects, the Group creates safe and publicly accessible urban spaces by providing proper lighting, efficient transportation infrastructure, and diverse greenery, among other things. In addition, the Group's commercial buildings ensure proper ventilation, thermal and visual comfort, and air quality.</p>	Impact materiality: very high	<b>The impact is positive, existing.</b> It results solely from the Group's own operations - design.	It does not affect the strategy, business model, value chain and decision-making process.	It results from the Group's value and a long-standing approach to managing it.	No significant financial impact.
<p><b>ESRS S4 Clients and end users. Inclusion of clients or end-users - creating inclusive spaces.</b> The Group is gradually implementing more and more solutions to create a welcoming space for various social groups. It is implementing them as standard in accordance with, among other things, standards for people with disabilities. Both Echo Investment and Archicom comply with many requirements related to providing friendly spaces between buildings (meeting places), accessibility for children and caregivers, bicycles and strollers, ease of getting around residential estates, etc.</p>	Impact materiality: high	<b>The impact is positive, potential.</b> It results only from the Group's own operations Group - design.	It does not affect the strategy, business model, value chain and decision-making process.	It results from the Group's values and a long-standing approach to managing this issue.	No significant financial impact.
<p><b>ESRS S4 Clients and end users. Social inclusion of clients or end users - using unfair sales practices.</b> It mainly concerns selling apartments, where the Group deals with individual clients, for whom the purchase of an apartment is often a life decision, of great financial importance.</p>	Impact materiality: high	<b>The impact is negative, potential.</b> It arises solely from the Group's own operations and is quite heavily regulated in the real estate industry, which limits the possibility of a negative impact.	It does not affect the strategy, business model, value chain and decision-making process.	It results from the Group's values and a long-standing approach to managing this issue.	No significant financial impact.



<p><b>ESRS G1 Business conduct. Protection of whistleblowers - transparent whistleblowing system.</b> The Group maintains a system of whistleblowing and whistleblower protection that is available to its own employees.</p>	<p>Impact materiality: high</p>	<p><b>The impact is positive, existing.</b> The Group takes care the functioning of reporting channels that are available to its own employees.</p>	<p>It does not affect the strategy, business model, value chain and decision-making process.</p>	<p>It results from the Group's values and a long-standing approach to managing this issue. No planned changes.</p>	<p>No significant financial impact.</p>
<p><b>ESRS G1 Business conduct. Corruption and bribery-incidents.</b> The Group put in place systemic solutions for corruption, conflict of interest and other difficult situations. The system is supported by mandatory ethics training and examinations and applies to own employees.</p>	<p>Impact materiality: very high</p>	<p><b>The impact is positive, existing.</b> The Group considers this risk as crucial to its own operations, as its consequences could be to reduce the confidence of the administration, public institutions and clients.</p>	<p>It does not affect the strategy, business model, value chain and decision-making process.</p>	<p>It results from the Group's values and a long-standing approach to managing this issue. No planned changes.</p>	<p>No significant financial impact.</p>

The double materiality analysis indicates that significant ESG matters for the Echo Investment Group are concentrated at the upstream level of the value chain (construction management, preparation, design, utilization of materials and resources).

The Group has not examined the resilience of its strategy and business model in terms of its ability to address material impacts and risks and to take advantage of material

opportunities. The double materiality analysis was conducted at the Group for the first time for the purpose of this report. In the future, the Group will analyze the need for such a study.

The Group believes that all material impacts, risks and opportunities are covered by the disclosure requirements related to ESRS.

# Double materiality analysis

ESRS2 IRO-1

The double materiality analysis was conducted for the first time for the Echo Investment Group, as well as for the Archicom Group, for the purposes of this report.

The double materiality testing process was conducted in December 2023 and consisted of the following steps:

1. Defining the organization's business context, identifying the stages of the business model and value chain;
2. Identification of potential impacts, risks and opportunities - creating a long list of topics for further detailed assessment;
3. Assessment of the materiality of impacts, risks and opportunities (impact and financial materiality);
4. Prioritization and final confirmation of results.

## Survey tools and engagement of stakeholders:

1. Field workshops attended by employees of the Group (approx. 2.5 hours each workshop)
  - Health, safety and environment and value chain group (5 participants).
  - Construction group (16 participants)
  - Finance and investor relations group (7 participants).
  - HR group (7 participants).
  - Commercial real estate group, issues of purchase, design, operation (10 participants from Echo Investment).
  - Residential real estate group, issues of purchase, design, sales (5 participants from Archicom).
2. Dialogue session with external stakeholders divided into two subgroups (about 2 hours each session)
  - Subgroup on finance and communities (6 participants).
  - Design subgroup (7 participants).
3. Materiality survey to a wide range of the Group's stakeholders (107 completed surveys).
4. Assessment of financial materiality of ESG matters by internal analysts
  - financial directors of Echo Investment and Archicom.
  - Echo Investment's chief accountant
  - financing and investor relations directors of the Group.
  - ESG reporting teams.
5. Analysis and approval of the double materiality study by the Management Board.



The process has assessed all sustainability matters included in the topical ESRS from the list in Article 16 of ESRS1 Appendix A. Workshops, dialogue sessions, and survey results allowed assessing the quality of an issue's impact on the Group (positive/negative and potential/existing), its scale, scope, irreversibility, and probability (for positive impacts). Each issue was then assessed through its financial impact on the Group by internal experts in the fields of financing, investor relations and ESG reporting.

In both the impact materiality and financial materiality approaches, each type of impact was given a score from 1 to 5 (where 5 means the greatest impact). Then, based on the ratings received, each matter was assigned one of the following impact categories: very high, high, medium, low and none. The Group considered as material matters those that received at least one rating in the "very high" and "high" categories. As a result of this process, the Group has developed a materiality matrix and defined material topics. The result of this process is presented in this chapter in ESRS2 SMB3 indicator above.

The process was carried out according to the principle of "from the big picture to the detail," whereby matters of higher priority (identifiable impact, risk or opportunity) were extracted from the Group's general operating principles in stages. As a result, the focus was on the activities of the Group's subcontractors at construction sites, relations with administration and authorities, development and safety of its own employees. The financial impact analysis was performed, taking into account the estimated additional expenditures for mitigating risks and the estimated amounts of potential penalties caused by their materialization.

In addition, the Group has chosen to disclose certain matters classified as medium impact that it considered important due to its management approach, its obligations under the Sustainable Growth Strategy or its existing reporting practice.

The Group's analysis relied on experience and expertise of external stakeholders and its own employees, as well as feedback received after the publication of the 2022 Sustainability Report. Internal control procedures were not included in the process. The process of identifying, assessing and managing impacts and risks was not included in the overall risk management process and was not used to assess the Group's overall risk profile or risk management processes used. The Group will consider this issue in the future.

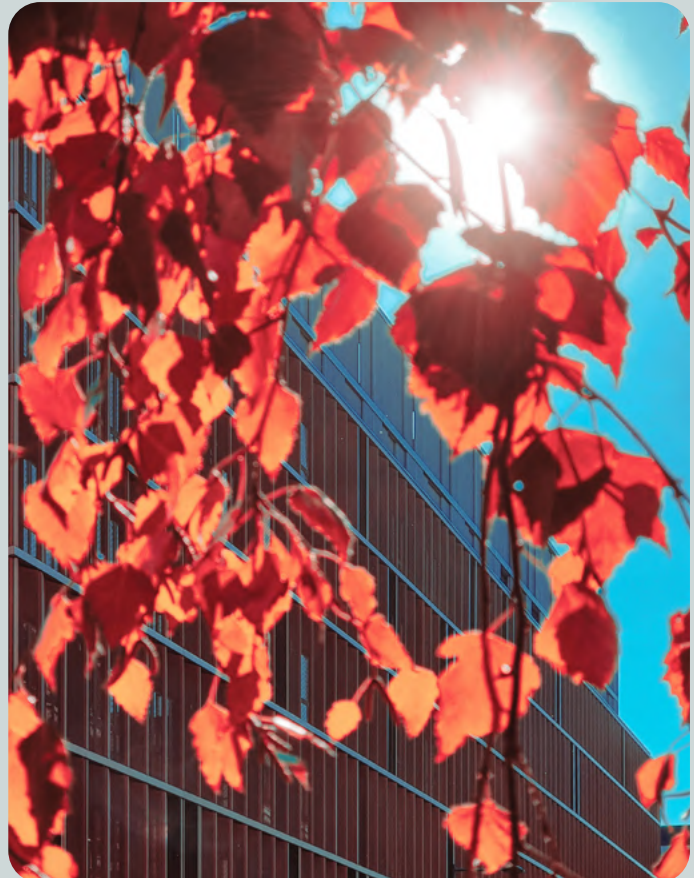
For more information on identifying climate-related risks, see Chapter 2 of this report "For the Planet" in ESRS2 IRO-1 indicator.

## Disclosure requirements

### ESRS2 IRO-2

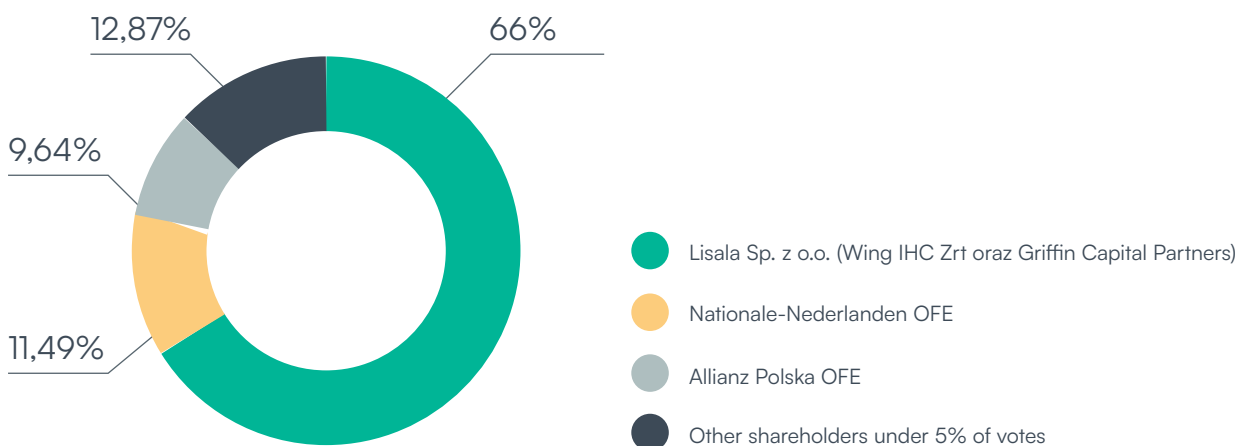
In this 2023 Sustainability Report, the Echo Investment Group has complied with disclosure requirements for the sustainability statement.

A list of fulfilled disclosure requirements for the preparation of the sustainability statement after the materiality assessment (content index) and a table including all data points that result from other EU regulations are included in Appendix 1 to this report.





## Shareholding structure of Echo Investment S.A. as of 31 December 2023



# Echo Investment Group's scale of operations in 2023:

**1 835**

apartments sold

**2 122**

apartments handed over to clients

**1**

finished office building sold - Moje Miejsce II in Warsaw (17,000 sqm)

**40 000 sqm**

of space finished, prepared and delivered to tenants

**1 109**

Resi4Rent apartments delivered

**2**

new locations in the CitySpace portfolio (Wrocław and Łódź)



**713**

business partners with whom we entered into contracts

**1734**

construction, construction-related and design contracts

**1,3 mld zł**

value of signed construction, construction-related and design contracts



02

# For the Planet

We co-create sustainable cities and spaces. We strive to ensure that our projects are built in already urbanized areas that have adequate infrastructure and provide comfort of functioning in the city. We make sure that each project improves biodiversity in the area.

We have started the process of reducing CO2 emissions in our work offices and in projects we build, so that they will be carbon-neutral in 2030. We promote renewable energy, using it both for our own needs and in buildings used by others.

We are supported in achieving our goals by a phased roadmap leading the Group to decarbonization, zero-emission of buildings, further increasing the role of greenery in projects, and supporting sound urban development.

## Our ambitions by 2030:



**100%**

of new buildings will be zero-emission at the operation stage (office and residential)



**100%**

of energy supplied to our own offices, retail and office buildings, all CitySpace locations and our construction sites will come from RES



**min. 2**

new plantings will replace any tree removed - that the level we want to maintain



**100%**

of our office and residential projects will be developed within city limits



**90%**

of purchased land for projects will be areas previously urbanized



**50%**

of developments under construction and in the pipeline will be built as "destinations" projects



# Climate change

ESRS2 GOV-3

Information on this indicator is presented in Chapter 1 of this report.

We are aware of climate change and its consequences for us and our surroundings. Therefore, we strive to minimize the environmental impact of our operations.

In 2022, we performed the first measurement of our organization's carbon footprint (scope 1 and 2), and in 2023 we performed the first measurement in scope 3 in order to set reduction targets for the following years. We have an ambition to make all new buildings of the Group zero-carbon at the operation stage by the end of 2030. We use and promote energy from renewable sources. We consume it both for our own needs and in projects.

Each of our projects is not only new places to live, work or relax. We make sure that these spaces are green, biodiverse and serve city residents and their guests. Our Group has rules for protecting trees and we consistently follow them. If we have to cut down a tree, we replace it with at least two new high-quality plantings, and we are supported in this by our annual valorization, carried out in cooperation with a dendrologist, of the trees removed and planted as part of the projects carried out by the Echo Investment Group. The dendrologist's indications are a valuable guideline for us to shape well-developed green spaces.





ESRS E1-1

# Transformation plan for climate change mitigation

**In brief**  
**Material topic due to double materiality study**

Scope	(E) environmental
ESRS	E1 Climate change
Material topic	<b>Adaptation to climate change</b>
Impact description	<b>Introduction of adaptation solutions</b>
Impact assessment	<b>Positive</b> , potential
Responsibility	Echo Investment Board Member responsible for ESG, CEO of Archicom
Scope	Designed and constructed buildings, architects

## Echo Investment Group's material topic disclosures

<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>• Health, Safety and Environmental Policy</li> <li>• 2030 Sustainability Strategy of the Group</li> <li>• ISO 14001, ISO 45001</li> </ul>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>• Ongoing analysis of solutions and applicability</li> <li>• No significant financial outlay</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>• Preparation for construction of zero-emission buildings by 2030</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	<ul style="list-style-type: none"> <li>• No defined metrics</li> </ul>

The Echo Investment Group is aware of challenges facing the construction and real estate industry as a result of the obligations of the Paris Agreement. The Group includes matters related to reducing greenhouse gases and reaching zero-carbon building construction in its ESG Strategy.



## ESG Strategy's selected goals for combating global warming

- Re-measurement of Scope 1 and 2 greenhouse gas emissions and establishment of the decarbonization strategy in 2024.
- Launch of work in 2024 on the design of pilot office (the goal postponed from 2023), residential and rental apartment buildings (the goal postponed from 2023), with the goal of implementing (economically justified) materials and technological solutions that reduce GHG emissions at each stage of the building's life, as well as maximize energy efficiency. The pilot building experience is to be used to implement systemic solutions in the building standards required by the Group.
- Use of 100 percent certified renewable energy in buildings used by the Group for its own purposes (headquarters), in finished office and retail buildings built by the Group, in CitySpace offices and at construction sites from 2026.

## Transformation plan

The Group has not adopted a detailed transformation plan for climate change mitigation, which to ensure a transition to a sustainable economy and limiting global warming to 1.5°C and achieving climate neutrality by 2050. The actions taken as described in the ESG Strategy (detailed above) are a starting step for the development of such a transformation plan. The climate transformation plan will then be incorporated into the Group's business strategy and financing.

ESRS2 SBM-3

## Material impacts, risks and opportunities and their interrelations with the strategy and business model

The Group has not analyzed in detail the resilience of its strategy and business model in terms of risks with respect to climate change. Such analysis was carried out as part of the double materiality analysis process, which is described in Chapter 1 of this report, in ESRS2 IRO-1 indicator.

ESRS2 IRO-1

## Processes for identifying and assessing climate-related material impacts, risks and opportunities

Based on sector data, scientific studies and expert knowledge, the Group has identified the following areas of climate-related risks that affect its business operations and ongoing investment projects.



Risks/opportunities arising from climate change	Impact on the Group	Method of management in the Group
REGULATORY/POLITICAL		
Compliance with legal and regulatory requirements of ESG	As a large public interest entity, the Group is required to meet a number of reporting and product standards and obligations. The requirements are increasing rapidly and are difficult to implement.  <b>Risks:</b> failure to meet requirements, administrative penalties.	<ul style="list-style-type: none"> <li>• Own legal team to analyze changes and legal requirements,</li> <li>• Own ESG team,</li> <li>• Cooperation with reputable advisors,</li> <li>• Cooperation with industry organizations, participation in conferences and topical trainings.</li> </ul>
TECHNOLOGICAL/PHYSICAL		
Greenhouse gas emissions in the construction sector	The construction process by its nature is carbon intensive, and available alternative technologies need to be popularized and do not fully meet client demand.  <b>Opportunities:</b> reduction of emissions and negative impact of the Group on the environment, ability to reduce emissions faster than competitors, which may translate into greater confidence from clients or financing institutions. <b>Risks:</b> limited ability to use alternative, low-emission materials and technologies.	<ul style="list-style-type: none"> <li>• Exploring the potential of using new materials, new ways of building (e.g., modular construction),</li> <li>• Ongoing monitoring of environmental requirements and adaptation to them,</li> <li>• Participation in industry organizations that also address these issues and monitor changes (e.g., the Polish Association of Developer Companies, technical organizations).</li> </ul>
Energy demand of buildings	Buildings account for 40 percent of the EU's final energy consumption and 36 percent of its energy-related greenhouse gas emissions.  <b>Opportunities:</b> reduction of building operating costs and environmental impact, building a competitive advantage by offering modern, energy-efficient buildings. <b>Risks:</b> too slow development of available energy demand reduction technologies in relation to the requirements under the Paris Agreement..	<ul style="list-style-type: none"> <li>• Constant improvement of primary energy demand indicators of buildings through materials used, technologies and improvement of measurement methods,</li> <li>• Constant monitoring of new legal and technical requirements and adapting the Group's activities to them,</li> <li>• Many years of experience in certifying buildings under the BREEAM system, which takes into account energy efficiency issues,</li> <li>• Reaching zero-carbon performance of buildings is the goal set in the ESG Strategy and has been written out in the Roadmap for 2023-2030.</li> </ul>



<p>Urban sprawl</p>	<p>The urban planning policy of cities is moving in the direction of densifying them, preventing sprawl to their suburbs.</p> <p><b>Opportunities:</b> consistency with the Group's business strategy, easier coordination of such projects with city policies and development directions.</p> <p><b>Risks:</b> lack of suitable plots of land to buy, difficulties in administrative procedures for large areas.</p>	<ul style="list-style-type: none"> <li>• Business strategy focusing on urban areas,</li> <li>• Experience in carrying out large-scale projects of urban scale,</li> <li>• Experience and competence of the Group in various real estate segments, ability to combine them in one project,</li> <li>• Own team responsible for land acquisition and administrative procedures,</li> <li>• Compliance of the built projects with local policies regarding the environment and urban adaptation strategies.</li> </ul>
<p>MARKETING</p>		
<p>Capital costs</p>	<p>Banks' policies are moving toward a preference for environmentally sustainable projects in providing financing. The cost of "non-green" financing is rising.</p> <p><b>Opportunities:</b> advantage related to the Group's potential when receiving financing, motivating the Group to achieve better ESG results.</p> <p><b>Risks:</b> difficulties in obtaining financing, higher cost of financing.</p>	<ul style="list-style-type: none"> <li>• Implementation of ESG-related activities, including reporting, well in advance of legal requirements,</li> <li>• Ongoing monitoring of opportunities to obtain preferential financing (ongoing contact with banks).</li> </ul>
<p>Client expectations</p>	<p>Awareness and requirements of consumers, as well as institutional clients, regarding climate impact issues are steadily growing and are increasingly on the list of criteria when choosing a property.</p> <p><b>Opportunities:</b> opportunity to stand out from the market by constructing buildings with the best energy efficiency and carbon performance.</p> <p><b>Risks:</b> getting dropped from the list of potential real estate providers due to failure to meet high energy and environmental impact standards.</p>	<ul style="list-style-type: none"> <li>• Conducted continuous surveys of individual client preferences,</li> <li>• Constant monitoring of institutional client requirements and adaptation of buildings to their needs.</li> </ul>

## REPUTATIONAL

Failure to meet stakeholder expectations about ESG

Lack of clear communication of climate impact actions taken or overly optimistic communication of these actions can build stakeholder expectations too high. The reputational risk is also possible if contradictions between communication and actual actions are revealed.

**Opportunities:** building up the confidence of stakeholders by clearly communicating activities and intentions.

**Risks:** deterioration of the Group's image if communication (or expectations) and actions diverge.

- Close cooperation of communications, investor relations and ESG functions,
- Fair communication, in accordance with the tenets of the Code of Conduct,
- Crisis management policy implemented.

The Group has not evaluated climate risks in time horizons, analyzed their impact on its assets and business operations, has not analyzed their impact on the life cycle of buildings under construction, and has not assessed its exposure to individual risks. The preparation of pioneering projects (buildings) in accordance with the ESG Strategy will be the beginning of such analysis.

### Assessment of exposure to physical risks from climate change

	Temperature-related	Wind-related	Water-related	Soil-related
Constant	Air temperature variability			Soil erosion
				Soil contamination
Acute	Heat waves	Gales and hurricane	Extreme storms	
			Heavy rains	
			Droughts and water deficit	
			Floods and waterlogging	

The Group identifies activities related to significant aspects of environmental protection and health and safety risks by assessing risks and opportunities, and in this way determines how to conduct management control. The identification of risks is mainly driven by laws and other regulations, as well as the organization's business practices. Physical risks and climate change adaptation are analyzed for each development project in order to select appropriate materials and technological solutions suitable for the project location. A description of the identification and assessment processes for material climate-related impacts, risks and opportunities can be found in Chapter 1 of this report, in ESRS2 IRO-1 indicator.

## Policies related to climate change mitigation and adaptation

The Group has adopted its environmental policy, which partly refers to climate change mitigation and adaptation.

The property development and construction business has a major impact on shaping a sustainable world, so the Group is involved at all levels in environmental management. The main document that determines business decisions and plans is the Environmental and Health and Safety Management System Book, of which the Environmental Policy and Safety Policy are included. It is a guide to favorably influence key stakeholders, especially contractors and suppliers, at the stage of land and building acquisition, procurement of materials and services (e.g., management of facilities, services of consultants, designers, contractors) and project or facility management in terms of environment as well as health and safety.

As of 2018, the Group is ISO 14001 certified, which is an international management standard that supports environment protection and pollution reduction and prevention activities. We also maintain high occupational health and safety standards, in line with ISO 45001 and ISO 14001, and we undergo Dekra audits every year to confirm that we comply with environmental best practices. We also improve our safe work standard every year. We monitor our suppliers', contractors' and partners' work and engage in dialogue with them to constantly improve the level of environmental protection. We prioritize selecting local partners to reduce our carbon footprint at the transportation stage. All orders and contracts with suppliers and contractors require counterparties to follow guidelines related to both environmental management and safety, in particular the Environmental and Health and Safety Management System Book and Health and Safety Requirements. We clearly define responsibilities regarding pollution and hazardous substances in contracts. All contractors also complete our EHS Questionnaire, in which we ask them to disclose information regarding:

- environmental management, including policies in place and certified environmental management systems, employee environmental training,
- impact of products/services on the environment,
- emission performance of materials,
- detailed safeguards in case of chemicals,
- compliance of products and services with national environmental regulations.

## Group's environmental policy goals

- Efficient use of energy.
- Reduction of gas emissions that are responsible for global climate change. If reductions are not possible, we try to balance the emissions generated by using available means.
- Demand reduction and, if possible, the reuse of materials. If this is not possible, ensuring safe treatment or disposal of waste.
- Waste segregation and using only such materials that are friendly to people and the environment.
- Reduction of adverse effects of operations on flora, fauna and their ecosystems.
- Cooperation with planners, municipal greenery boards, specialized companies, neighbors and local communities to protect trees.
- Water demand reduction, water saving and reuse.
- Reduction of pollutants emitted into the atmosphere by projects, motor vehicles, mobile and stationary equipment, and processes.
- Staff training and development.

In addition, the policy related to climate change mitigation is provided by the Group's ESG Strategy, which includes goals for reducing greenhouse gas emissions, increasing energy efficiency, using renewable energy, which should consequently contribute to climate change mitigation.



## ESRS E1-3

## Actions and resources in relation to climate policy

The Group is preparing to begin work on the design of pilot buildings for offices, apartments and apartments for rent, with the goal of implementing (economically justified) materials and technological solutions that reduce greenhouse gas emissions at each stage of the building's life, and maximize energy efficiency. Experiences from the pilot buildings are to be used to implement systemic solutions in construction standards required by the Group and can be the basis for the transformation plan. Due to organizational changes in the Group in 2023, the start of the goal has been partially postponed until 2024.

The pilot projects will allow for the application of decarbonization levers (including solutions based on natural resources), the determination of expected GHG reductions, and the estimation of capital and operating expenditures required to carry out the transformation plan. The Group is strengthening its ESG team, educating employees, and working with reputable consulting and engineering firms to support the process.

The ability to implement planned activities depends on the availability and allocation of the following resources:

- efficient and economically justified materials and technologies,
- financing at affordable costs,
- availability of qualified experts and advisors,
- investments in research and development.

## ESRS E1-4

## Climate change mitigation and adaptation goals

Climate change mitigation and adaptation goals are outlined in the Group's ESG Strategy.

Goal	Implementation time*
Adoption of the decarbonization strategy for Scope 1 and 2	2024
Adoption of the decarbonization strategy for Scope 3	2025
100 percent green electricity in buildings used for the Group's own needs (headquarters)	2023
100 percent of green electricity in finished buildings managed by the Group (office buildings and shopping centers)	2025
100 percent of green electricity in offices of CitySpace	2026
100 percent of green electricity at construction sites managed by the Group	2026
Providing an adequate level of replacement of removed trees	2023
Making all new Group buildings zero-carbon	2030

\* Due to organizational changes in the Group in 2023, the implementation of some goals will be postponed.

Due to the expected impact on climate change mitigation, the most important action will be the decarbonization strategy for Scope 3, as it relates primarily to developed projects, materials and technologies used. By contrast, it also means increasing the energy efficiency of these buildings.

## Energy consumption and energy mix

The Echo Investment Group's energy consumption is primarily due to the operation of its own offices, as well as costs incurred for the functioning of finished but unoccupied buildings. In this case, consumption relates to electricity and heat (network). Another category is the company's own vehicle fleet, which overwhelmingly uses diesel fuel. There are negligible refrigerant leaks in the buildings. The vast majority of the energy consumed is purchased, the direct consumption of fuels (with the exception of vehicle fuel) is negligible.

### Energy consumption and energy mix for the Group's own operations (Scope identical to Scope 1 and 2 of the carbon footprint) (MWh)

	2023
Fuel consumption from coal and coal products	-
Fuel consumption from oil and petroleum products	3 004.953
Fuel consumption from natural gas	374.177
Fuel consumption from other fossil sources	-
Consumption of purchased or procured electricity, heat, steam and cooling from fossil sources	5496.085
<b>Total consumption of energy from fossil sources (sum of lines 1-5)</b>	<b>8875.215</b>
<b>Share of fossil sources in total energy consumption (%)</b>	<b>83%</b>
<b>Energy consumption from nuclear sources</b>	<b>-</b>
<b>Share of nuclear energy consumption in total energy consumption (%)</b>	<b>-</b>
Fuel consumption for renewable sources, including biomass (also including industrial and municipal bio-waste, biogas, renewable hydrogen, etc.)	-
Consumption of purchased or procured electricity, heat, steam and cooling from renewable sources	1226.621
Consumption of self-generated renewable energy without the use of fuel	-
<b>Total consumption of renewable and low-carbon energy (sum of lines 8-10)</b>	<b>1226.621</b>
<b>Share of renewable sources in total energy consumption (%)</b>	<b>17%</b>
<b>Total energy consumption (sum of lines 6 and 11)</b>	<b>10 101.836</b>

### Group's energy intensity indicator (Wh/PLN 1 per revenue)

Consolidated sales revenue (in PLN)	1 573 293 000
Energy intensity* (total energy consumption / net revenue)	6.421 kWh/PLN

\* All emissions and all net revenues of the Group have been taken into account in calculating the indicator, as the Group's core business is homogeneous and qualifies as sectors with material climate impacts, and revenues from other activities are not significant.

# Greenhouse gas emissions

## In brief

### Material topic due to double materiality study

Scope	(E) environmental
ESRS	E1 Climate change
Material topic	<b>Climate change mitigation</b>
Impact description	<b>1. Taking steps to reduce GHG emissions from Scope 1 and 2. 2. GHG emissions from projects (Scope 3).</b>
Impact assessment	1. <b>Positive</b> , existing 2. <b>Negative</b> , existing
Responsibility	Echo Investment Board Member responsible for ESG, CEO of Archicom
Scope	Management of office spaces used for own purposes

## Echo Investment Group's material topic disclosures

<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>Health, Safety and Environmental Policy</li> <li>2030 Sustainability Strategy of the Group</li> </ul>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>Gradual transition to green energy used in own offices</li> <li>Re-calculation of GHG emissions from Scopes 1 and 2</li> <li>Start counting carbon footprint from Scope 3</li> <li>No significant financial outlay</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>Reduction of greenhouse gas emissions</li> <li>Use of only green energy in own offices</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	<ul style="list-style-type: none"> <li>Emission intensity indicators</li> <li>Share of green energy consumption in own offices</li> </ul>

## Greenhouse gas emissions

The Group provided the first information on Scope 1 and 2 greenhouse gas emissions in 2022. The 2023 data was based on similar assumptions, expanded to include Scope 3 emissions and with the exclusion of data from CitySpace, which was found to be inaccurate upon rechecking. The CitySpace data will be added when recalculating for 2024. For data comparability, the Group excluded CitySpace in this report also for 2022. The exclusion of the CitySpace data in 2022 reduced the emissions reported in 2022 from Scope 2 by 4 percent (market-based approach) and 5.3 percent (location-based).

The calculations for both years were conducted by the Climate Strategies Poland Foundation.

## Limits of reported emissions

Organizational limits of the GHG emission calculations performed were established on the basis of operational control and included the Group's twenty-two locations (offices used for own purposes, commercial buildings, and facilities built and managed by the Group), as well as the vehicle fleet (cars owned by the Group, leased for the Group's own employees, and employees' own cars used for the Group's purposes - a lump sum for the use of a private car for business purposes). The consolidation covers all levels of the Group.

The reported emissions were calculated in accordance with the Greenhouse Gas Protocol (GHG) standard. The calculations include emissions of carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs) and nitrogen trifluoride (NF<sub>3</sub>), converted to CO<sub>2</sub> equivalents.



## Methodology

The GHG Protocol standard was used to calculate the Group's carbon footprint. A Corporate and Reporting Standard, revised edition, March 2004, World Resources Institute and World Business Council for Sustainable Development. (Revisions and Amendments: Required gases and GWP values, February 2013).

## Scope 2 emission counting methodology

**The market-based approach** (using the emission factor of purchased electricity and heat (district heat) according to a rate from the energy supplier) and the location-based approach (using the emission factor of purchased electricity and heat [district heat] according to the national rate) according to the GHG Protocol. Scope 2 Calculation Guidance. An amendment to the GHG Protocol Corporate Standard, 2015. world Resources Institute.

## Scope 3 emission counting methodology

GHG Protocol. Corporate Value Chain (Scope 3) Accounting and Reporting Standard. Supplement to the GHG Protocol Corporate Accounting and Reporting Standard, 2011. World Resources Institute and World Business Council for Sustainable Development.

GHG Protocol. Technical Guidance for Calculating Scope 3 Emissions (version 1.0). Supplement to the Corporate Value Chain (Scope 3) Accounting & Reporting Standard, 2013. World Resources Institute and World Business Council for Sustainable Development.



## Operational limits of GHG emission calculations performed

### Scope 1

Direct emissions from refrigerant leaks and natural gas combustion in buildings used for own purposes, diesel fuel consumption in emergency power units, and fuels in vehicles (car fleet used by employees).

### Scope 2

The Group's indirect emissions resulting from the use of purchased electricity and heat, primarily for the Group's own premises, as well as those resulting from electricity and heating charges for unleased spaces in finished office buildings owned by the Group or already sold, but for which the Group has obligations to pay such charges.

### Scope 3

The Group's indirect emissions resulting from the following categories:

- Category 1: Purchased goods and services  
Emissions resulting from purchased materials, products and services and water consumption.
- Category 2: Capital goods  
Emissions resulting from purchased capital goods.
- Category 3: Energy and fuel-related activities not included in Scope 1 and 2  
Emissions from electricity and heat (district heating) transmission losses and well-to-tank emissions in the upstream stages of the production chain for natural gas, diesel, fuels in the Group's fleet, and electricity and heat (district heating).
- Category 5: Waste generated in operations  
Emissions resulting from waste water production and waste generated in the Echo Investment Group's offices.
- Category 6: Business travel  
Emissions resulting from business travel, lodging and a lump sum intended for employees' commuting to clients and construction sites.
- Category 7: Employee commuting
- Category 13: Downstream - leased assets

Emissions resulting from refrigerant leaks, natural gas combustion, diesel consumption in emergency power units, and purchased electricity and heat (district heating) in leased projects of the Echo Investment Group.

## Direct and indirect greenhouse gas emissions of the Group (t CO<sub>2</sub>e)

	2022	2023	Difference
<b>Scope 1 - total direct emissions</b>	<b>1 097.4</b>	<b>916.2</b>	<b>-16.5%</b>
fuel consumption in vehicles	893.7	809.2	-9.5%
fuel consumption in buildings in use	92.5	69.0	-25.4%
refrigerant leaks in buildings in use	111.1	37.9	-65.9%
<b>Scope 2 - total indirect emissions - (market-based)</b>	<b>3 625.1</b>	<b>2 159.8</b>	<b>-40.4%</b>
purchase of electricity (buildings + fleet)	1 641.8	828.4	-49.5%
purchase of thermal energy - district heating network	1 983.2	1 331.4	-32.9%
<b>Scope 2 - total indirect emissions - (location-based)</b>	<b>4 943.57</b>	<b>3 775.12</b>	<b>-23.6%</b>
purchase of electricity	2 989.2	2 424.1	-18.9%
purchase of thermal energy - district heating	1 954.4	1 351.0	-30.9%
<b>Total emissions Scope 1 + 2 (market-based)</b>	<b>4 722.43</b>	<b>3 075.91</b>	<b>-34.9%</b>
<b>Total emissions Scope 1 + 2 (location-based)</b>	<b>6 040.92</b>	<b>4 691.27</b>	<b>-22.3%</b>
<b>Scope 3 - total indirect emissions</b>	-	78 732.83	-
Category 1 and 2	-	64 537.62	-
Category 3	-	651.52	-
Category 5	-	60.35	-
Category 6	-	114.40	-
Category 7	-	179.91	-
Category 13	-	13 189.03	-
<b>Total emissions Scope 1 + 2 + 3 (market-based)</b>	-	<b>81 808,74</b>	-
<b>Total emissions Scope 1 + 2 + 3 (location-based)</b>	-	<b>83 424.10</b>	-

The large decrease in emissions from Scope 1 and 2 was mainly due to Archicom's relocation to the MidPoint71 office building, where 100 percent of electricity comes from renewable sources. An additional element improving the Group's carbon footprint is the provision of certified energy for the City1 building, which Archicom owns.

## Greenhouse gas emission intensity indicators in kg CO<sub>2</sub>e (market-based)

	Unit	2022	2023	Difference 2023/2022
Emissions Scope 1 + 2	Equivalent kg CO <sub>2</sub>	4 722 430	3 075 914	-34.9%
Per own employee*	Equivalent kg CO <sub>2</sub> / person	7 048.40	4 874.67	-30.8%
Per 1 sqm of property development projects under construction and in use**	Equivalent kg CO <sub>2</sub> / 1 sqm	9.53	5.40	-43.3%
Per net revenue***	Equivalent kg CO <sub>2</sub> / thous. PLN	3.39	1.96	-42.3%
Emissions Scope 1 + 2 + 3	Emissions Scope 1 + 2 + 3	-	81 808 750	-
Per own employee*	Equivalent kg CO <sub>2</sub> / person	-	129 649.36	-
Per 1 sqm of property development projects under construction and in use**	Equivalent kg CO <sub>2</sub> / 1 sqm	-	143.75	-
Per net revenue***	Equivalent kg CO <sub>2</sub> / thous. PLN	-	52.00	-

\* In 2022 - 670, in 2023 - 631.

\*\* In 2022 - 495 500 sqm, in 2023 - 569 100 sqm. Values excluding finished residential projects Resi4Rent and Galeria Młociny, which are outside the Group's operational control.

\*\*\* Sales revenues from the consolidated financial statements of the Echo Investment Group.



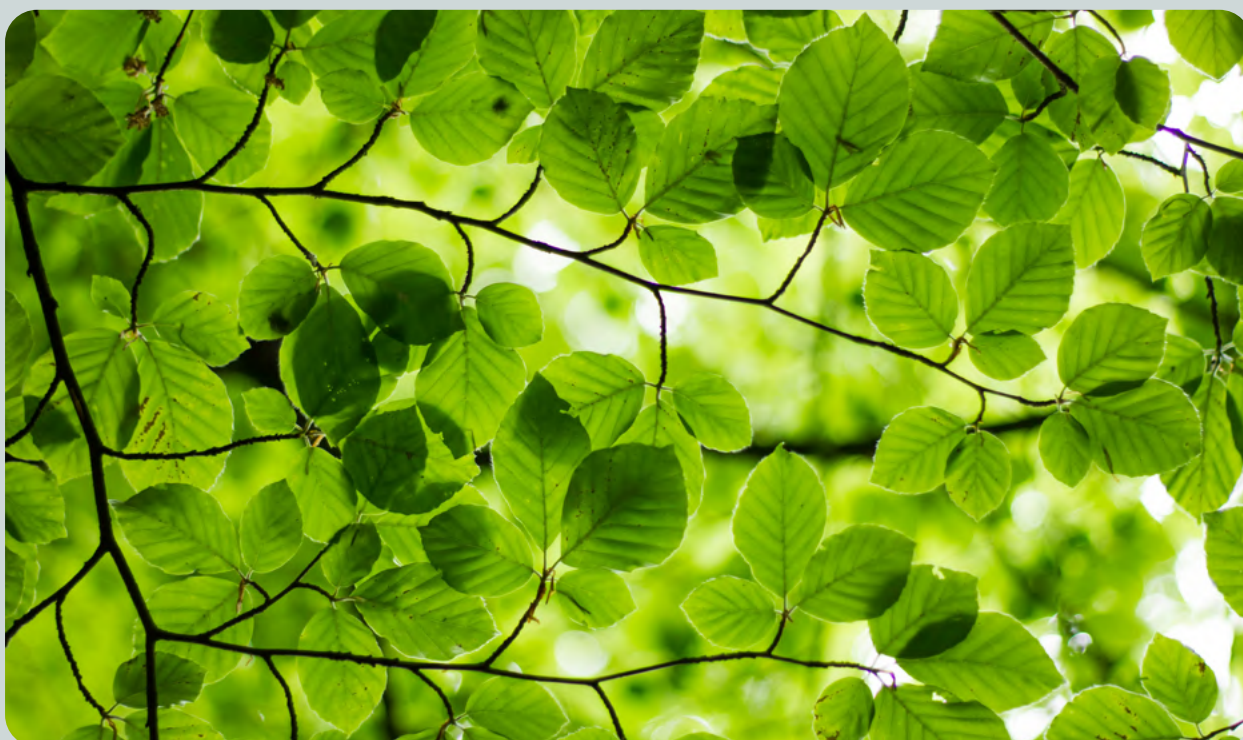
## Greenhouse gas emission intensity indicators in kg CO<sub>2</sub>e (location-based)

	Unit	2022	2023	Difference 2023/2022
Emissions Scope 1 + 2	Equivalent kg CO <sub>2</sub>	6 040 923	3 691 267	-38.9%
Per own employee*	Equivalent kg CO <sub>2</sub> / person	9 016.30	5 849.87	-35.1%
Per 1 sqm of property development projects under construction and in use**	Equivalent kg CO <sub>2</sub> / 1 sqm	12.19	6.49	-46.8%
Per net revenue***	Equivalent kg CO <sub>2</sub> / thous. PLN	4.33	2.35	-45.8%
Emissions Scope 1 + 2 +3	Emissions Scope 1 + 2 +3	-	83 424 100	-
Per own employee*	Equivalent kg CO <sub>2</sub> / person	-	132 209.35	-
Per 1 sqm of property development projects under construction and in use**	Equivalent kg CO <sub>2</sub> / 1 sqm	-	146.59	-
Per net revenue***	Equivalent kg CO <sub>2</sub> / thous. PLN	-	53.03	-

\* In 2022 - 670, in 2023 - 631.

\*\* In 2022 - 495 500 sqm, in 2023 - 569 100 sqm. Values excluding finished residential projects Resi4Rent and Galeria Mlociny, which are outside the Group's operational control.

\*\*\* Sales revenues from the consolidated financial statements of the Echo Investment Group.





## In brief

### Material topic due to double materiality study

Scope	(E) environmental
ESRS	E1 Climate change
Material topic	Energy
Impact description	<ol style="list-style-type: none"> <li>1. Energy consumption in buildings delivered</li> <li>2. Energy consumption in own operations and construction sites</li> <li>3. Application of energy-efficient solutions and product alternatives for commercial buildings</li> </ol>
Impact assessment	<ol style="list-style-type: none"> <li>1. <b>Negative</b>, existing</li> <li>2. <b>Positive</b>, existing</li> <li>3. <b>Positive</b>, existing</li> </ol>
Responsibility	Directors of architectural departments
Scope	Proper building design and application of technology

### Echo Investment Group's material topic disclosures

Policy [MDR-P]	<ul style="list-style-type: none"> <li>• Health, Safety and Environmental Policy</li> <li>• 2030 Sustainability Strategy of the Group</li> </ul>
Actions and resources [MDR-A]	<ul style="list-style-type: none"> <li>• Research and application of new efficient technologies and materials to increase energy efficiency</li> <li>• Monitoring of consumption</li> <li>• No significant financial outlay</li> </ul>
Goals [MDR-T]	<ul style="list-style-type: none"> <li>• Reduction of energy losses and increase of energy efficiency of buildings</li> <li>• No other defined goals</li> </ul>
Metrics (indicators) from ESRS [MDR-M]	<ul style="list-style-type: none"> <li>• PE indicators</li> </ul>

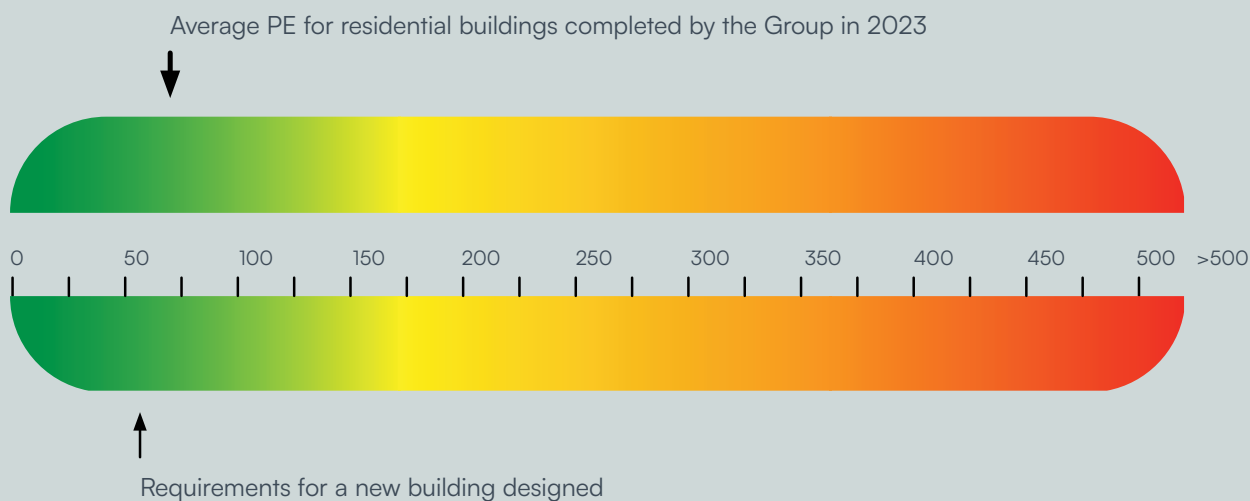
### Energy efficiency of residential buildings

The average annual demand for non-renewable primary energy (PE) indicator is calculated for each designed building and referred to the technical and building regulations. The standard, or maximum ratio, is updated every few years. The latest regulations say that for a multi-family residential building it is 65.00 kWh/(sqm \* year). This means that it is the standard that applies to all designed buildings. The average for buildings being delivered in 2023 is higher because they were designed earlier, when standards were lower.

### Average annual non-renewable primary energy demand indicator (PE) for the Group's residential buildings - arithmetic average (kWh/[sqm \* year])

	2021	2022	2023
	81.8*	78.4	73.07

## Annual non-renewable primary energy demand indicator PE of residential buildings completed by the Group in 2023 (kWh/[sqm \* year])



The average PE for Resi4Rent's buildings with apartments for rent completed in 2023 was 155.26 kWh/(sqm\* year).

The emphasis on energy efficiency in office buildings became important much earlier than in relation to residential buildings. This is due, among other things, to the fact that their buyers (usually international funds) calculate the price and future cash flow of the building, taking into account energy costs. Residential price calculations are based on completely different grounds and motivations.

Echo Investment's commercial buildings are certified in the BREEAM system, in which a significant part of the criteria is related to reducing energy consumption and carbon emissions.

In 2023, the BREEAM certification was awarded to:



### As-built:

Biura przy Warzelni (Browary GH) in Warsaw — the „excellent” level,  
 MidPoint 71 in Wrocław — the „excellent” level,  
 Brain Park A i B (phase 1) in Kraków — the „excellent” level,  
 Fuzja CD in Łódź — the „excellent” level,  
 Fuzja J in Łódź — the „excellent” level.

### At the design stage:

Brain Park C (phase 2) in Kraków — the „excellent” level.

The Group monitors energy consumption at construction sites, but has not adopted measurable goals related to reducing consumption.

## Consumption of energy and its carriers in the Group

	2022	2023	Difference 2023/2022
Motor fuel consumption by the Group's employees	336 632 l	306 987 l	-8.8%
Intensity (fuel consumption per 1 sqm under construction*)	0.92 l/sqm	0.86 l/sqm	-6.5%
Motor fuel consumption related to transport to Group construction sites	-	354 265 l	-
Intensity (fuel consumption per 1 sqm under construction*)	-	0.99 l/sqm	-
Electricity consumption by the Group's construction sites	5 970 789 kWh	5 519 790 kWh	-7.6%
Intensity (electricity consumption per 1 sqm under construction*)	16.4 kWh/sqm	15,4 kWh/sqm	-6.1%

\* According to the average portfolio under construction for a year (arithmetic average of sqm under construction of Echo Investment from the beginning and end of the period and the end of three quarters of the year).

The Group does not apply internal emission fees.





# Water and marine resources

ESRS E3





## Description of processes for identifying and assessing material impacts, risks and opportunities associated with biodiversity and ecosystems

The Group has identified and assessed actual and potential upstream and downstream impacts on biodiversity and ecosystems in the value chain through the double materiality analysis, as well as its own experience. A detailed description of the double materiality test is presented in Chapter 1 of the report in ESRS2 IRO-1 indicator. As a result of the analysis, a water subtopic, including surface water and groundwater consumption, was considered material.

The Group has analyzed the water topic:

- in its own premises - consumption for its own needs;
- in finished buildings developed by the Group - consumption for tenants' needs;
- at construction sites - consumption for construction processes by subcontractors.

The Group has not identified locations, operations or assets with particularly high impacts on environmental values and ecosystem services. All of the Group's own operations have an equal impact on water resources. The Group's operations are not dependent on key goods related to marine resources (e.g., gravels and seafood). The Group has not consulted on the issue of water and marine resources with affected communities.

The Group's impact on the water matter is related to the following operations:

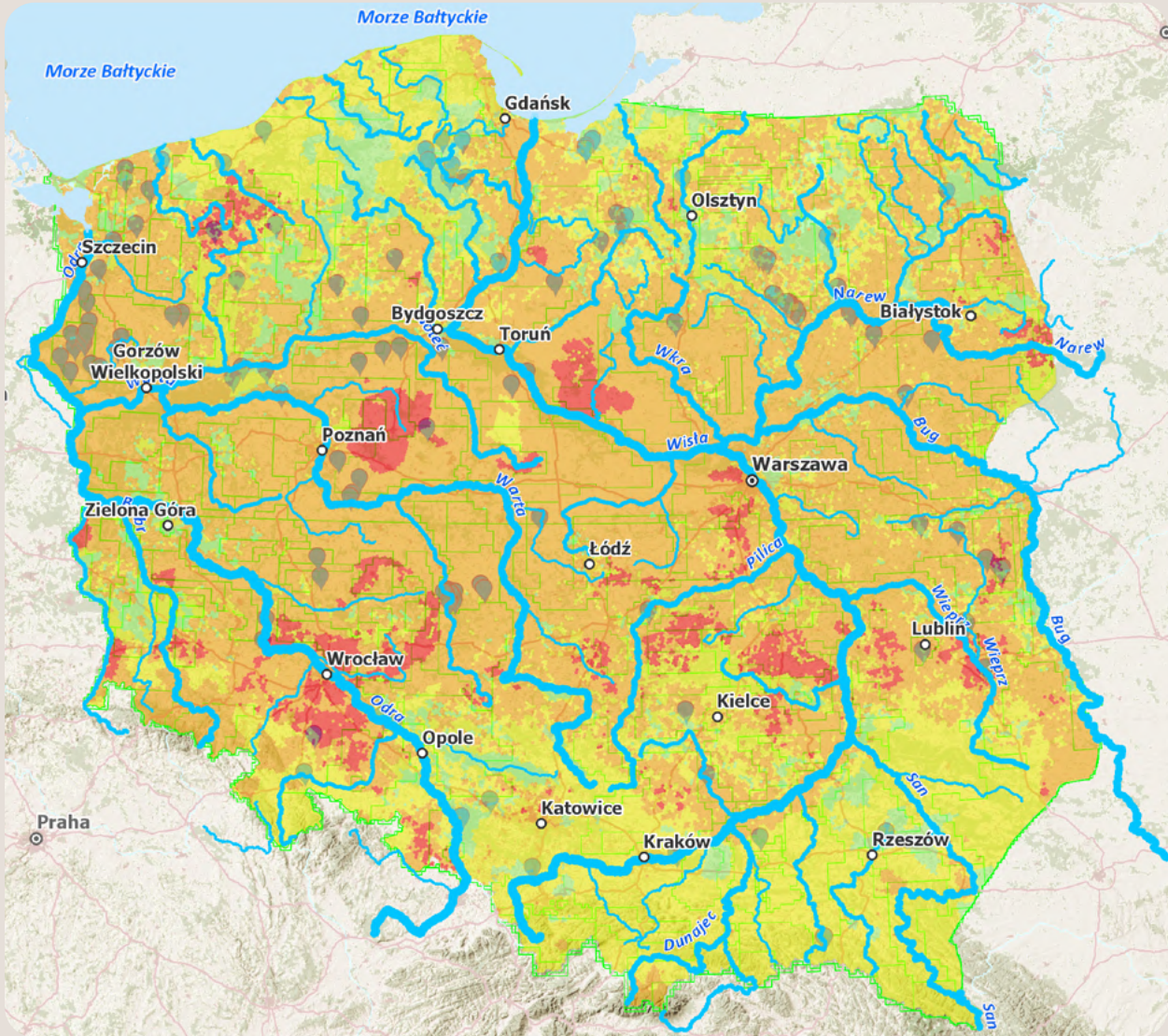
- water consumption in finished commercial buildings (office buildings). The volume of this consumption is due to its scale (e.g., a large number of people using the building at the same time) and technologies used to reduce consumption (over which the Group has full control);
- water consumption in finished buildings and residential estates. The Group has limited influence over applied water-saving technologies in individual apartments (these are at the discretion of their owners), but it does have influence over technologies for water management in the entire building (e.g., use of rainwater);
- water consumption for construction technological processes. Building technologies use large amounts of water and are difficult to replace.

For some of the Group's projects, the impact of water may be due to the proximity of water bodies (primarily rivers in Wrocław), resulting in an increased risk of flooding. However, this impact was not considered material in the double materiality analysis.

The Group's projects are developed in the zones of moderate drought risk (Gdańsk, Łódź, Kraków), strong drought risk (Poznań, Warsaw, Wrocław) and extreme drought risk (partly Wrocław), as classified by the IT System for the Protection of the Country. The Group's offices are located in zones of moderate (Kielce) and severe drought threat (Warsaw, Wrocław).



## Map of Poland showing drought risk



Key:

### Drought risk level

- Low
- Moderate
- Strong
- Extreme

### Water resources in Poland



The volume of renewable freshwater resources in Poland is less than 1,600 m<sup>3</sup> per capita, indicating a risk of water stress. This is below the level of water security, according to a report by the Central Statistical Office. Poland has much lower drinking water resources than the European average - 1,700 m<sup>3</sup> versus 51,000 m<sup>3</sup> per person per year.



## Water-related policies

The Group does not have a separate policy that deals with the matter of water, but its regulations in this regard result from the adopted Environmental Policy, which declares that the Group reduces the demand for water, saves it and reuses it. The Group's Environmental Policy does not meet the requirements set by the MDR-P. The Group will study the possibility of bringing it into compliance with the requirements of this indicator.

This policy is detailed by the BREEAM certification system, under which all of the Group's commercial buildings (office buildings) are certified.

### Areas of analysis of BREEAM certification in relation to water topic in buildings

#### Use

Reducing the demand for drinking water by providing efficient and effective sanitary fittings, rainwater collection and recycling systems.

#### Monitoring

Using water meters to help manage and monitor water consumption to reduce the effects of inefficiency and leakage.

#### Leak detection and prevention

Systems for detecting major water leaks in the network, flow control devices for sanitary facilities, and easily accessible leak stop valves to halt and repair leaks with minimal water loss.

#### Effective devices

Use of water other than drinking and sanitary water in buildings.

The water policy applied is primarily aimed at reducing water abstraction and use, and promoting sustainable water use based on long-term protection of available resources.

## Water-related activities and resources

### In brief

#### Material topic due to double materiality study

<b>Scope</b>	(E) environmental
<b>ESRS</b>	E3 Water and marine resources
<b>Material topic</b>	<b>Water</b>
<b>Impact description</b>	<b>Reduction of wear and tear at the use stage of commercial premises</b>
<b>Impact assessment</b>	<b>Positive</b> , existing
<b>Responsibility</b>	Director of the department of architects
<b>Scope</b>	Planned installations, department of architects

#### Echo Investment Group's material topic disclosures

<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>Health, Safety and Environmental Policy</li> </ul>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>Ongoing analysis of water consumption</li> <li>Analysis of technologies of solutions to reduce water consumption</li> <li>No significant financial outlay</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>Providing efficiency in water use</li> <li>No other defined goals</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	<ul style="list-style-type: none"> <li>Water consumption</li> </ul>

## Water management activities of the Group

### Reducing consumption

- monitoring water consumption at construction sites,
- use of water-saving devices (e.g. aerators in faucets), taps with limited water capacity,
- educational activities, promoting water saving.

### Recovery and reuse

- designing greenery and open, permeable areas in a way that ensures that as much rainwater as possible is retained on the site, instead of being discharged into the sewer system (so-called "blue infrastructure");
- keeping the permeable area indicator as high as possible;
- planting plants that have higher water absorption with less transpiration (e.g., flower meadows instead of lawns);
- using stored rainwater to water plants.

Water conservation issues are also part of BREEAM certification, as described in ESRS indicator E3-1 above. In 2023, the Group implemented them in the following office projects.



In 2023, the BREEAM certification was awarded to:



#### As-built:

Biura przy Warzelni (Browary GH) in Warsaw — the "excellent" level,  
MidPoint 71 in Wrocław — the "excellent" level,  
Brain Park A i B (phase 1) in Kraków — the "excellent" level,  
Fuzja CD in Łódź — the "excellent" level,  
Fuzja J in Łódź — the "very good" level.

#### At the design stage:

Brain Park C (phase 2) in Kraków — the "excellent" level.

ESRS E3-3

## Water-related goals

The Group has set a general goal of aiming to reduce water consumption and reuse, although it has not set specific goals. Since this is a material topic, the Group monitors water consumption and analyzes results. In the future, the Group may set measurable and specific goals.



## Water consumption

The Group uses for its own purposes offices located in four buildings: MidPoint 71 in Wrocław, Astra Park in Kielce, Biuro przy Willi and Willa Schielego in Warsaw. In total, the Group occupies 8,743 sqm.

### Water consumption

	2022			2023		
	Full-year consumption	Consumption per 1 sqm	Consumption per EUR 1 mil net revenue	Full-year consumption	Consumption per 1 sqm	Consumption per EUR 1 mil net revenue
For own use	2 435 m <sup>3</sup>	0.285 m <sup>3</sup> /sqm*	8.19 m <sup>3</sup> /EUR 1 mln	2 622 m <sup>3</sup>	0.300 m <sup>3</sup> /sqm*	7.2 m <sup>3</sup> /EUR 1 mln
From construction sites managed by the Group	35 669 m <sup>3</sup>	0.098 m <sup>3</sup> /sqm**	119.9 m <sup>3</sup> /EUR 1 mln	34 910 m <sup>3</sup>	0.098 m <sup>3</sup> /sqm**	96.5 m <sup>3</sup> /EUR 1 mln
Wastewater from construction sites	18 580 m <sup>3</sup>	0,051 m <sup>3</sup> /sqm**	62.5 m <sup>3</sup> /EUR 1 mln	12 680 m <sup>3</sup>	0.035 m <sup>3</sup> /sqm**	35.0 m <sup>3</sup> /EUR 1 mln

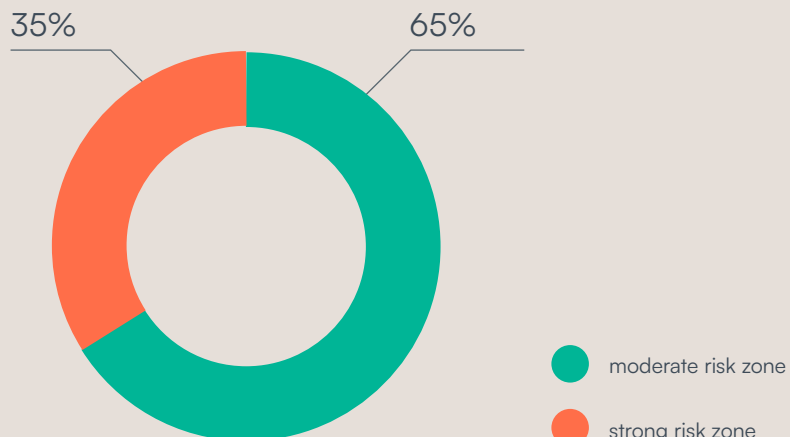
\* Area used for own purposes (as of the end of the year).

\*\* According to the average state of the portfolio under construction in the year (arithmetic average of sqm under construction from the beginning and end of the period and the end of the three quarters of the year).

The Group estimates that its greatest impact on reducing water consumption is related to the processes of construction (due to the high intensity of consumption) and installations in finished commercial buildings, primarily office buildings (due to the real impact and the long assumed impact).

The Group's offices are located in zones of moderate (Kielce) and severe drought risk (Warsaw, Wrocław), according to the classification of the IT Country Protection System.

### Water consumption in own offices, by drought zone (in percent)





# Biodiversity and ecosystems

ESRS E4





## ESRS2 SBM-3

## Material impacts, risks and opportunities and their interrelationship with strategy and business model

Topics material to the Group resulting from the double materiality analysis are presented in Chapter 1 of this report in ESRS2 SBM-3 indicator. Biodiversity matters that result from this analysis include:

- direct drivers of biodiversity loss - removal of trees from areas affected by projects,
- direct drivers of biodiversity - plantings and protection of existing trees.

## ESRS2 IRO-1

## Description of processes for identifying and assessing material impacts, risks and opportunities associated with biodiversity and ecosystems

The Group has identified and assessed actual and potential upstream and downstream impacts on biodiversity and ecosystems in the value chain through the double materiality analysis, as well as its own experience. A detailed description of the double materiality test is presented in Chapter 1 of the report in ESRS2 IRO-1 indicator.

The Group is not in a position to disclose other information regarding, among other things, risks and opportunities, consultations with affected communities, participation in individual impact drivers, etc., because it has not developed a comprehensive organization-wide biodiversity risk register in accordance with the Taskforce on Nature-related Financial Disclosures Recommendations - TNFD. The Group is developing such a list for each project.

Out of the portfolio of projects under construction in 2023, the Group has identified one that was being built in biodiversity-sensitive areas - Sady nad Zielona in Księżę Wielkie, Wrocław, which is now completed.

The project is bordered to the east by the Grobla Oławska, which separates it from the Natura 2000 protected area Grądy w Dolinie Odry PLH020017 with the Zielona (Szalona) River. The project area is approximately 3 hectares. Archicom's execution was associated with a number of additional obligations, ensuring that negative impacts on biodiversity and the environment were minimized. As a result, Archicom's activities did not negatively affect the adjacent Natura 2000 area, did not deteriorate the condition of natural habitats and habitats of species, and did not disturb species for which the protected area was designated. To this end, Archicom has taken the following actions:

- conducting an environmental impact assessment of the project,
- taking into account the proximity of the Natura 2000 area in the greenery project,
- timing of the work and tree removal were agreed with an ornithologist,
- tree removal was reduced to the necessary, compensatory plantings of tall greenery were provided,
- the area of mouse garlic, located within the project boundaries, was preserved in an undisturbed state, mowing and maintenance works of the area were adjusted to recommendations of ecologists,
- recommendations of an ecologist and an ornithologist for the greenery project were taken into account.

The lack of material environmental impact was confirmed by the Regional Director of Environmental Protection.

ESRS E4-2

## Policies related to biodiversity and ecosystems

Our projects often require interference with existing environmental conditions. The most acute and noticeable for the urban ecosystem is tree cutting. For this reason, at the Echo Investment Group, we make sure that our operations are as little disruptive as possible.

The Group's policy on biodiversity protection is based on legal requirements and its own regulation, the Environmental Policy. The Group has not implemented a separate policy for the protection of biodiversity and ecosystems. The Group's environmental policy does not meet requirements set by the MDR-P. The Group will study the possibility of bringing it into compliance with the requirements of this indicator.

The Group's existing Environmental Policy declares that both companies limit their adverse impacts on flora, fauna and their ecosystems, and that they cooperate with planners, municipal greenery boards, specialized companies, neighbors and local communities to secure and protect trees.

At Echo Investment, the Environmental Policy is developed with documents and requirements related to ISO 14001\* and ISO 45001\*\* certification, included in the Environmental and EHS Management System Book. The certification is also planned at Archicom, to confirm management standards and raise the quality of EHS matters.



We strive to use energy efficiently and reduce gas emissions that are responsible for global climate change. If the reduction is not possible, we try to balance generated emissions by using available means.



We reduce demand and, where possible, reuse materials. Where we cannot take advantage of these opportunities, we provide safe treatment or disposal of waste.



We reduce the adverse impact of our activities on flora, fauna and their ecosystems. We work with planners, municipal greenery boards, specialized companies, neighbors and local communities to protect trees.



We segregate waste and use only materials that are friendly to people and the environment.



We reduce our need for water, save it and reuse it.



We reduce the amount of pollution emitted into the atmosphere by our projects, road vehicles, mobile and stationary equipment, and processes.



We conduct staff training and development following ecological principles.



100 percent of wood embedded on our construction sites is FSC or PEFC certified.

\* ISO 14001 - this is an international management standard that has supported our activities related to environmental protection and pollution reduction and prevention for six years.

\*\* ISO 45001 - this is an international standard that supports our occupational health and safety management activities.

## ISO 14001 and ISO 45001 biodiversity certification requirements

Identification of environmental aspects at Echo Investment takes place in the various stages of project preparation and execution (processes within the organization):

1. Land purchase stage - the EHS department, together with the property management department, inspects purchased land to identify potential environmental aspects that may take place due to the erection of buildings and their subsequent operation;
2. Design stage - design documentation for the building(s) is developed by external design offices. Identification of environmental aspects at this stage is carried out as part of the preparation of the "Register of Risks and Opportunities" document. The design offices developing the documentation can indicate how the building, construction materials used and the layout of spaces around the buildings can positively and negatively affect the environment;
3. Construction phase - the EHS department, together with individual construction teams, conducts continuous monitoring of conditions on ongoing projects, among other things, in order to identify environmental aspects on an ongoing basis and assess the effectiveness of previously introduced measures - in particular, those that would reduce the negative impact of the organization on the environment. The described and identified environmental aspects are to be captured in the appendix "Register of environmental aspects". The Group's EHS managers, after compiling the document, forward it to the EHS Director for approval.

In describing identified environmental aspects, qualification should be made:

- material or non-material aspect;
- type of aspect - indicating whether it arises during normal operation (a process in the organization) or whether it is an unusual or emergency aspect;
- place of origin - indicating from which process it originates (stage of project preparation and execution).

The "Register of environmental aspects" should specify:

- ways and methods of managing aspects in question;
- ways of monitoring aspects.

A review of the elaborated "Register of environmental aspects" takes place every year. Potentially, changes in identified aspects may be related to changes in the organization's policies, among other things, and may provide a basis for setting future goals. These indicators may include, but are not limited to, data on supplies of materials and collection of waste (CO2 emissions - carbon footprint), reports on complaints and grievances submitted by third parties (relating to environmental matters), the number of trees cut down, waste water emission rates, waste generated and consumption of utilities (water, electricity). Locally, for each project carried out, starting from the design stage, the "Register of Project Risks and Opportunities" is developed. At the stage of construction work, the investor's team on the project reviews the document and updates it.

Contractors are required to submit environmental data on an ongoing basis, so-called "environmental indicators." In relation to commercial projects (office buildings), our biodiversity policy is further defined by requirements of the BREEAM certification, according to which we design and build.



# BREEAM certification biodiversity requirements

The project involves a qualified ecologist who prepares an assessment of the project site in terms of ecology and use of the land before the start of the project on the basis of study work, site visit and environmental knowledge. The report should include BREEAM issues on the following information:

## 1. Land's ecological value

Encouraging the development of land that has low value for wildlife, and protecting existing ecological elements from damage during preparation and construction work.

## 2. Impact on the land's ecological status

The ecologist defines recommendations to improve the ecology of the area.

These are measures that the ecologist reasonably expects can be implemented, given their feasibility, construction or site limitations. These measures may include, but are not limited to:

- Planting native plant species and tall trees in specified numbers;
- Adopting good horticultural practices (e.g., not using peat substrates, avoiding single-species plantings, preferring flower meadows to cut lawns, irrigation that uses rainwater, or planting plants that can survive without watering);
- Installation of bird, bat or insect boxes in appropriate locations on the site;
- Elimination of invasive species;
- Increasing the proportion of biologically active areas in relation to the requirements of the local plan.
- The ecologist's "recommendations" should be implemented in the greenery project.

## 3. Biodiversity development plan

The ecologist confirms that all relevant EU, local and national regulations for ecological protection and improvement have been met during the design and construction process. The site-specific biodiversity development and habitat management plan has been developed (considering the impact of the building both during construction and operation), covering at least the first five years after its completion. It is to be provided to the owner or users of the building and includes:

- Management of any protected elements on the site;
- Management of any new, existing or improved habitats;
- Reference to any current or future legal requirements (local, national or regional) that apply to the site with respect to the protection of species and habitats
- Confirmation that all relevant aspects of ecology have been included in the plan;
- Adoption of an additional 4 of the following 5 measures to improve the long-term biodiversity of the assessed area:
  - a. appointment of a biodiversity leader who has the authority to influence activities on the site and ensure that harmful impacts on the site's biodiversity are minimized as recommended by the ecologist,
  - b. training of site personnel on how to protect the ecology of the site during the execution of the project,
  - c. recording actions taken to protect biodiversity and monitoring their effectiveness at key stages of the construction process,
  - d. creation of a new ecologically valuable habitat suitable for the area, i.e., a habitat that supports biodiversity of national, regional or local importance,
  - e. carrying out works in a manner that minimizes disturbance to wildlife.

EHS managers of both companies are responsible for implementing the Group's Environmental Policy. Since it is up to contractors and subcontractors at construction sites to implement the measures stipulated by the policy, the content of the policy is made available and promoted to them (including by posting it on bulletin boards or EHS boards located at each construction site).

In 2023, the BREEAM certification was awarded to:



**As-built:**

- Biura przy Warzelni (Browary GH) in Warsaw — the "excellent" level,
- MidPoint 71 in Wrocław — the "excellent" level
- Brain Park A i B (phase 1) in Kraków — the "excellent" level
- Fuzja CD in Łódź — the "excellent" level
- Fuzja J in Łódź — the „very good” level.

**At the design stage:**

- Brain Park C (phase 2) in Kraków — the „excellent” level.



# Tree protection and removal compensation

We start analyzing the feasibility of using the existing stand of trees at an early stage of the project. We try to avoid the need to remove trees and require that the project documentation include a reliable assessment of the phytosanitary condition of the trees. During the construction process, we always properly protect the trees to be preserved, in such a way as to guarantee their survival and proper development. If we are forced to disturb the existing ecosystem and remove the trees, we try to compensate it to the environment.

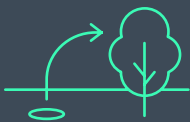
ESRS E4-3

## Actions and resources related to biodiversity and ecosystems

### Tree protection guidelines

The obligation to protect trees and shrubs falls not only on our work contractors, but also on us - the investor. We are guided by the principle of reducing the negative impact on the environment in our actions. We strive to ensure that the project documentation includes reliable dendrological information. We recommend proposing measures to increase the biological value of the site. We have compiled all the rules on measures to protect trees and shrubs during construction work on the Group's projects in the "Tree protection guidelines" handbook. The publication is available to all interested parties, contractors and subcontractors. The guidelines apply to all construction sites managed by the Group.

### Basic rules for dealing with trees at construction sites:



if possible and reasonable, we replant trees that interfere with the project instead of removing them;



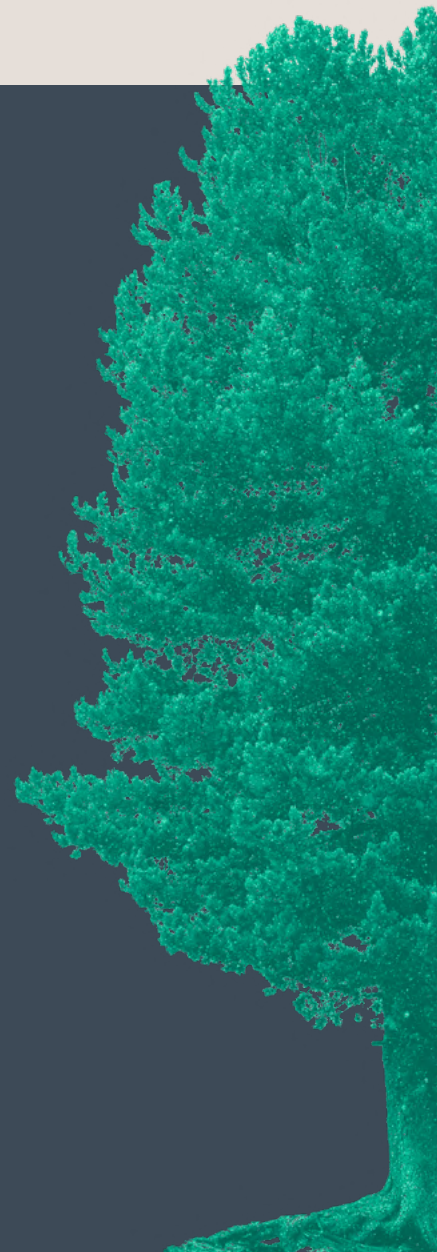
we take special care of trees and shrubs that we preserve on the project site, secure and observe them;



we work with city's greenery boards, neighbors and local communities to find new places for replanted trees - if trees need to be removed, we replace them with new plantings (compensatory plantings), in accordance with current legal regulations;



we make every effort to ensure that trees and shrubs are not damaged during construction work and retain their vitality.





**In brief**  
**Material topic due to double materiality study**

<b>Scope</b>	(E) environmental
<b>ESRS</b>	E4 Biodiversity and ecosystems
<b>Material topic</b>	<b>Direct drivers affecting biodiversity loss</b>
<b>Impact description</b>	<b>1. Removal of trees from the project area</b> <b>2. Plantings and protection of existing trees</b>
<b>Impact assessment</b>	<b>Positive</b> , potential
<b>Responsibility</b>	Director of the department of architects
<b>Scope</b>	Greenery design, administrative decisions

**Echo Investment Group's material topic disclosures**

<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>• Health, Safety and Environmental Policy</li> <li>• Sustainable Strategy 2030 of the Group</li> <li>• Tree protection guidelines</li> </ul>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>• Ongoing analysis of tree removal and planting</li> <li>• No significant financial outlay</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>• Providing adequate replacement of removed trees</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	<ul style="list-style-type: none"> <li>• Estimate of nature value and number of trees removed to planted</li> </ul>

**Tree removal and planting**

Every year we conduct a detailed comparative analysis of the trees removed and those planted. This is both a quantitative and qualitative analysis. It is performed for us by Edyta Rosłon-Szeryńska, PhD. Her methodology involves evaluating trees under eight criteria:



estimated age



tree size assessment



potential size



value of species



state of preservation



location and function in the city's natural system



community's persistence and type



ecosystem services provided

## Analysis of removed and planted trees

	2022	2023
Number of trees planted (pcs.)	312	428*
Average rating of the value of a tree planted	19.5 pts.	20.5 pts.
Cumulative natural value of trees planted	6094 pts.	8779 pts.
Number of trees removed	131	207
Average rating of the value of a tree removed	21.03 pts.	24.8 pts.
Cumulative nature value of trees removed	2756 pts.	5129 pts.
Ratio of number of trees planted to trees removed	2.38	2.07
Ratio of nature value of trees planted to removed	2.21	1.71

\* Of which 136 are compensatory plantings and 292 - voluntary.

According to the report, the value of trees removed in 2023 increased by 99 percent compared to the value of removals in 2022. The increase in the value of trees planted was lower, amounting to 44 percent. However, there is still an advantage in number and value of trees planted over those removed: 2.07 and 1.71, respectively. This means that the ESG Strategy's goal of maintaining a quantity and quality advantage of 2 in each reporting year has been met only in terms of the number of trees.

The tree replacement analysis is designed to monitor whether measures to compensate for biodiversity loss are in line with the goal, and to build and implement knowledge on how to strengthen biodiversity in the Group's project areas. The Group expects that the implemented measures will result in strengthening biodiversity awareness among employees, mitigating the impact of the Group's business activities on the environment and biodiversity, and further improving the effectiveness of the measures taken to protect biodiversity.

The Group, implementing the tree replacement policy, does not contribute to any accidental or intentional introduction of invasive species. Species of planted plants (including trees) are consulted with specialists-arborists. The dendrological analysis also indicated that nearly 10 percent of the trees removed belonged to expansive species (ash-leaf maple, red oak, black locust and Canadian poplar).

The Group did not analyze financial consequences of the measures taken regarding the replacement of removed trees. These are measures that have been monitored since 2020 and have been implemented by the Group for many years, due to legal requirements, client demands and awareness of the need for sustainable business.



# Echo-Łąka program

In 2020, in cooperation with the Łąka Foundation, we launched an ecological, multi-year program called Echo-Łąka. We establish urban floral meadows that positively influence the microclimate, biodiversity and reduce smog. Seven floral meadows with a total area of nearly 6,500 sqm have already been created under the program: in Warsaw at Towarowa Street, in Łódź in the vicinity of the sustainable Zenit residential estate and next to the React office building, in Poznań, near the planned project at Opieńskiego Street, in Kielce, next to our headquarters, in Kraków at Bystrzycka Street and in Wrocław at Pokoju Avenue and next to the West4Business Hub office building. These are perennial meadows that have been created on areas managed by municipal institutions or our Group. The care and maintenance of the meadows is handled by the Group and the Łąka Foundation. We intend to develop the project in the following years so that our contribution to improving the climate and aesthetics of cities will be noticeable.

In 2023, three new flower meadows were created, including the largest flower meadow in Wrocław next to the West4Business Hub building. It covers an area of 5,500 sqm.



ESRS E4-4

## Goals related to biodiversity and ecosystems

The Group's ESG strategy stipulated two primary goals related to biodiversity protection:

1. Introduction and promotion of tree protection guidelines at construction sites managed by the Group - the level of the mitigation hierarchy: avoidance and minimization.
2. Providing adequate replacement of removed trees with plantings - the mitigation hierarchy level: compensation measures.

The introduction of uniform guidelines, which go far beyond the construction industry's accepted practice of tree stand management, will have a positive impact on the environment and environmental awareness of employees. The Group expects that the implementation of the guidelines may reduce the number of trees that are removed and increase the quality of those that remain on the project site. As a result, it will reduce compensation requirements.

The introduction of a tree replacement policy taking the form of a pledge to replace removed pieces with trees having at least twice the number and assessed nature value will reduce the negative impact on the Group's environment to the extent that it is extremely important and sensitive for urban communities. For the avoidance of doubt, the tree stand analysis is performed by Dr. Edyta Rosłon-Szeryńska, a recognized arborist and assistant professor at the Department of Landscape Architecture at the Warsaw University of Life Sciences, who is also the author of the adopted survey methodology.

The adopted biodiversity goals were not analyzed for consistency with the post-2020 Global Biodiversity Framework, relevant aspects of the EU's 2030 Biodiversity Strategy and other national biodiversity and ecosystem policies and regulations.



ESRS E4-5

## Impact measures related to change in biodiversity and ecosystems

In 2023, tree protection guidelines were implemented throughout the Group.

The Group has also met most of its goals on replacing trees cut down with plantings.

### Tree removal replacement indicators in 2023

Goal description	Goal	Execution
Quantitative: replacement of trees removed with plantings (in units)	2	2.07
Qualitative: replacement of removed trees with plantings (in their natural value)	2	1.71

The quantitative indicator is a quotient of the number of trees planted to trees removed.

The qualitative indicator is a quotient of the cumulative natural value of trees planted to trees removed.





# Resource use and circular economy

ESRS E5



## ESRS2 IRO-1

## Description of processes for identifying and assessing material impacts, risks and opportunities associated with circular economy

The Group has identified and assessed actual and potential impacts on resource use in the value chain through the double materiality analysis, as well as its own experience. A detailed description of the double materiality study is provided in Chapter 1 of the report in ESRS2 IRO-1 indicator.

The Group has reviewed its resources and operations and identified actual and potential impacts, risks and opportunities within its own operations and upstream and downstream in the value chain during the double materiality analysis. The Group has assumed that resource use and the circular economy are material topics on all construction sites (i.e., in the Group's supply chain), regardless of their location. All have a similar level of materiality, and all are subject to the same requirements from the Group, particularly regarding reporting.

EHS managers of both companies are responsible for implementing the Group's Environmental Policy. Since it is up to contractors and subcontractors at construction sites to implement measures stipulated by the policy, the content of the policy is made available to them and promoted (including by posting it on bulletin boards or EHS boards located on each construction site).

Aside from the double materiality study, the Group did not consult with stakeholders on the use of resources.

## ESRS E5-1

## Policies related to resource use and circular economy

The Group's policy on resource use is based on legal requirements and its own regulation, the Environmental Policy. The Group has not implemented a separate policy on resource use and the circular economy. The Group's environmental policy does not meet the requirements set by the MDR-P. The Group will study the possibility of bringing it into compliance with the requirements of this indicator.

### Provisions of the Group's Environmental Policy in relation to resource use:

1. We strive for non-generation of waste by reducing demand and, where possible, reusing materials, and where we cannot take advantage of these opportunities, we provide safe treatment or disposal of waste.
2. We segregate materials and use only those that are friendly to people and the environment.

In practice, this policy translates into the application of the following guidelines at construction sites:

- accurately determining the need for materials and services and the logistics involved in providing them;
- setting and enforcing annual waste segregation goals;
- controlling chemicals used at construction sites;
- maintaining order in and around construction sites, regular inspections (ongoing and continuous - weekly);
- compliance with all rules for handling waste, especially hazardous waste.



The Group's approach to the waste hierarchy - sequence of waste prevention and waste management priorities:

1. prevention,
2. preparation for reuse,
3. recycling,
4. other recovery methods, e.g., energy recovery, disposal.

The Group does not analyze the topic of resource use and the possibility of reuse throughout the life cycle of buildings, and particularly at the demolition stage. However, the approach applied to deconstructed and demolished buildings and structures seeks to maximize the use of the resulting material, including through demolition and segregation at the demolition site and limiting the disposal of mixed waste.

ESRS E5-2

## Actions and resources related to resource use and circular economy

### In brief

#### Material topic due to double materiality study

<b>Scope</b>	(E) environmental
<b>ESRS</b>	E5 Resource use and circular economy
<b>Material topic</b>	<b>Waste</b>
<b>Impact description</b>	<b>Segregation of waste at construction sites</b>
<b>Impact assessment</b>	<b>Positive</b> , existing
<b>Responsibility</b>	Heads of EHS departments, construction site directors
<b>Scope</b>	Waste management at construction sites, affects workers in the supply chain

### Echo Investment Group's material topic disclosures

<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>• Health, Safety and Environmental Policy</li> </ul>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>• Ongoing analysis of waste and segregation levels</li> <li>• No significant financial outlay</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>• Reduction of mixed waste disposal</li> <li>• No other defined goals</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	<ul style="list-style-type: none"> <li>• Level of waste segregation at construction sites</li> </ul>

The specific nature of the Group's operations and its products (buildings) implies maximum durability of buildings, from design, use of materials, to the construction process, operations anticipated for at least several decades and periodic renovations or reconstruction. In order to extend the life cycle of buildings, at the design stage, the use of technologies and materials of better quality or that allow the building to adapt to future changes (caused, among other things, by the impact of climate change) is analyzed.

## Waste segregation

We have implemented clear goals in the Group for waste generated at construction sites. Our first choice is to segregate construction waste by fractions already on the construction sites. Waste containers are labeled in detail and include information on waste types and their code. We also provide containers for hazardous waste and the possibility of segregating social waste. The Group sets the goal of segregating at construction sites and limiting mixed waste disposal in order to have more control over the further reuse of waste. Moreover, waste segregation and reuse is economically justified for the vast majority of its mass: waste such as metal, copper and rubble is a valuable secondary raw material.

During demolitions, the Group's on-site subcontractors pre-segregate demolition materials into steel elements, reinforced concrete, brick rubble or waste paper. Companies we work with are required to segregate waste from our construction sites and provide Waste Cards with confirmations of the amount of waste received.

## Hazardous substances

We control chemicals used at construction sites. At the design stage, we use guidelines for chemical materials classified into those of low, medium and high risk (COSHH list of hazardous substances). These materials are also divided according to use recommendation: to use without additional restrictions, to analyze the use for a safer substitute, and explicitly to replace with a safer substitute.

Hazard categories we identify are toxicity, corrosivity, causticity, health hazard, compressed gas, oxidizing properties, explosiveness, flammability, environmental hazard. We always recommend designing with chemical materials that are safe for users and the environment. Whenever a project involves the use of chemicals other than those listed or high-risk substances, the choice must be confirmed by the EHS department.

All of the significant steps being taken to improve resource use and promote the circular economy involve activities in the supply chain - at architects (design stage) and contractors (during construction).

ESRS E5-3

## Goals related to resource use and circular economy

The Group's goals with regard to resource use relate to waste management, including preparing waste for appropriate treatment.

Echo Investment's resource use goal for 2023 was to achieve a level of 90 percent segregation of waste generated at construction sites. This is a voluntary goal, i.e. not enforced by legislation. Archicom has not adopted resource use goals for 2023.

The average annual level of segregation at construction sites was 76 percent at Echo Investment, which is below the goal. This is due to organizational changes in the Group, including changes in the EHS department, as well as overly ambitious assumptions about the ability to meet this goal. The goal for 2024 is to segregate 70 percent of waste at construction sites across the Group, which is a realistic target to be met.

The Group monitors the effectiveness of its policies and actions taken to address material impacts, risks and opportunities related to sustainable resource use through its ongoing reporting system on waste volumes and the degree of waste segregation. The Group regularly raises its ambition level for the proportion of waste segregated at construction sites (Echo Investment's 2022 goal was 60 percent, performance 77 percent).

# Resource impacts

## Construction waste

	2022	2023
Waste collected at construction sites (in tons)	16 788 t	14 742 t
Intensity (weight of waste per sqm under construction)*	46.1 kg/sqm	41.1 kg/sqm
Level of segregation at construction sites	77%	76%

\* According to the average state of the portfolio under construction in the year (arithmetic average of sqm under construction from the beginning and end of the period and the end of the three quarters of the year).

The Group is not organizationally prepared to collect and aggregate information on waste fractions and their further processing and use. However, experience and general insight show that the vast majority of waste from construction sites is destined for recycling and reuse (primarily due to economic viability). The level of segregation achieved relates to the separation of waste into individual fractions (such as rubble, metal, wood), as well as mixed waste, the reuse of which is dependent on further processing at specialized facilities. Non-segregated waste at construction sites is segregated by entities that collect it, as evidenced by documents they submit.

## Hazardous waste

Hazardous waste collected from the Group's construction sites was mainly tar paper and small amounts of asbestos. All of them were handed over to professional entities that took care of their disposal or neutralization.

In addition, contaminated soil from land remediation was removed from construction sites. This category of waste is not included in the total waste generated by the Group in 2023. It was also transferred to the specialized entities that handled its disposal or neutralization.

	2022	2023
Hazardous waste collected at construction sites	227 t	73 t
Intensity (weight of hazardous waste per 1 sqm under construction*)	0.62 kg/sqm	0.2 kg/sqm
Removed soil and ground containing hazardous substances	2 976 t	4 264 t

\* According to the average state of the portfolio under construction in the year (arithmetic average of sqm under construction from the beginning and end of the period and the end of the three quarters of the year).



# We report on taxonomic disclosures

In 2022, the European Union introduced a taxonomy, or systematics, by which a company shows what proportion (% share) of its business, analyzed by its turnover, capital expenditures (CapEx) and operating expenditures (OpEx), is environmentally sustainable. It is also an instrument that makes it easier for us to plan and report on our progress toward zero-carbon.

The systematics is structured around six environmental goals:

- Climate change mitigation,
- Adaptation to climate change,
- Sustainable use and protection of water and marine resources,
- Conversion to circular economy,
- Pollution prevention and control,
- Protection and restoration of biodiversity and ecosystems.

Below, in accordance with Article 8 of EU Regulation 2020/852 (Taxonomy), information is provided on how and to what extent Echo Investment Group S.A.'s activities are related to business activities that qualify as environmentally sustainable (activities in line with the systematics). The key performance indicators have been prepared in accordance with the requirements set forth in EU Delegated Regulation 2021/2178, to the best of our knowledge and with due diligence.

The assessment of the compliance of business activities with the systematics, under individual key performance indicators, was carried out based on the technical criteria set forth in EU Delegated Acts 2021/2139 and 2022/1214.

## Positive impact of taxonomy:



building trust and reducing greenwashing



greater awareness of the organization's impact on the environment



transparency of economic activities



setting reduction goals

## Minimum safeguards

Echo Investment Group S.A. meets minimum safeguards referred to in Article 18 of EU Regulation 2020/852. The assessment of meeting the minimum safeguards was carried out based on the requirements recommended for entities subject to the CSRD according to the report of the EU Platform for Sustainable Finance, published in October 2022.

# KPI turnover

	Code	Total revenue	Revenue share	Criteria for significant contribution						Criteria "Do not do serious damage"						2023			
				Climate change mitigation	Adaptation to climate change	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention and control	Protection and restoration of biodiversity and ecosystems	Climate change mitigation	Adaptation to climate change	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention and control	Protection and restoration of biodiversity and ecosystems				
Business activities (data in PLN)		PLN thous.	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	%	%
A. Taxonomy-eligible activities																			
A.1. Environmentally sustainable activities (consistent with taxonomy)																			
Acquisition and ownership of buildings	7.7	17 139	1.11	1.11	0	0	0	0	0	Y	Y	Y	Y	Y	Y	Y	1,11		
Total: Turnover from environmentally sustainable (taxonomy compliant) activities (A.1)		17 139	1.11	1.11	0	0	0	0	0	Y	Y	Y	Y	Y	Y	Y	0		
A.2 Taxonomy-eligible activities but not environmentally sustainable activities (non-taxonomy-compliant activities)																			
Construction of new buildings	7.1	1 293 212	83.61	0	0	0	0	0	0	Y	Y	N/A	N/A	N/A	N/A		83.61		
Acquisition and ownership of buildings	7.7	211 466	13.67	0	0	0	0	0	0	Y	Y	N/A	N/A	N/A	N/A	Y	13.67		
Total: Turnover from taxonomy-eligible activities, but not environmentally sustainable activities (non-taxonomy-eligible activities)		1 504 678	97.28	0	0	0	0	0	0								97.28		
Total (A.1 + A.2)		1 521 817	98.39	0	0	0	0	0	0								98.39		
B. Non-taxonomy-eligible activities																			
Turnover from non-taxonomy eligible activities		24 947	1.61																
Total (A + B)		1 546 764	100																



## Accounting principles

The basis for calculating the key performance indicator for Turnover (KPI Turnover) was the Echo Investment Group's consolidated financial statements for 2023, prepared in accordance with International Financial Reporting Standards (IFRS). Net sales revenue from the aforementioned report was used as the denominator of the indicator.

Information on the assessment of compliance with Regulation (EU) 2020/852



## Information on assessment of compliance with Regulation (EU) 2020/852

Echo Investment Group's various revenue categories were analyzed for eligibility for the systematics. This process included an analysis of the activities eligible for the systematics as defined in EU Regulation 2021/2139, EU Regulation 2022/1214 and EU Regulation 2023/2486 to confirm whether the activities carried out by the Echo Investment Group are listed in the aforementioned Regulations.

The Echo Investment Group's main sources of revenue fall under activities 7.1 "Construction of new buildings" and 7.7 "Acquisition and ownership of buildings." In the next step, an assessment of the compliance of the activities carried out with the Technical Qualification Criteria for activities 7.1 and 7.7 was carried out. As a result of the analysis, revenues related to the activities in line with the systematics were identified.

The business activities carried out by the Echo Investment Group under the activities 7.1 Construction of new buildings and 7.7 Acquisition and ownership of buildings, includes:

- Construction and sale of apartments and related revenues,
- Construction and related services,
- Lease of office, retail and residential space..



## Contribution to multiple goals and disaggregation of key performance indicators

The Echo Investment Group received PLN 1,546,764 thous. of revenue in 2023, of which more than 98.39 percent was considered eligible for the taxonomy's systematics, but not in compliance with it. Systematics-eligible and environmentally sustainable activities were considered 1.1 percent of the revenue value. The remaining 1.61 percent of the activities' revenue represents the turnover of non-systematics-eligible activities, i.e., those for which the regulator has not established Technical Eligibility Criteria.

## Context information

Under systematic and environmentally sustainable qualifying activities, costs of activities 7.7 are listed. Buildings constructed and handed over for use by the Echo Group meet the criteria specified for buildings in 7.7 Acquisition and ownership of buildings, as buildings affecting climate change mitigation.



# KPI Capex

Business activities (data in PLN)	Code	Capital expenditures in absolute terms	Percentage share of capital expenditures	Criteria for significant contribution						Criteria "Do not do serious damage"						2023		Category (support activities)	Category (transition activities)	
				Climate change mitigation	Adaptation to climate change	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention and control	Protection and restoration of biodiversity and ecosystems	Climate change mitigation	Adaptation to climate change	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention and control	Protection and restoration of biodiversity and ecosystems	Minimum safeguards	Share of taxonomy-compliant activities in capital expenditures			Share of taxonomy-compliant activities in capital expenditures
		PLN thous.	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	%	%	%
<b>A. Taxonomy-eligible activities</b>																				
<b>A.1. Environmentally sustainable activities (consistent with taxonomy)</b>																				
Acquisition and ownership of buildings	7.1	117 525	47.60	47.60	0	0	0	0	0	Y	Y	Y	Y	Y	Y	Y	47.60			
Total: Revenue from environmentally sustainable (taxonomy compliant) activities (A.1)		117 525	47.60	47.60	0	0	0	0	0								47.60			
<b>A.2 Taxonomy-eligible activities but not environmentally sustainable activities (non-taxonomy-compliant activities)</b>																				
Transportation by motorcycles, passenger cars and light commercial vehicles	6.5	1 526	0.62		0.62	0	0	0	0	Y	Y	N/A	N/A	N/A	N/A	Y	0.62			
Acquisition and ownership of buildings (here lease)	7.7	121 142	49.06		49.06	0	0	0	0	Y	Y	N/A	N/A	N/A	N/A	Y	49.06			
Total: Capital expenditures from taxonomy-eligible activities, but not environmentally sustainable activities (non-taxonomy-eligible activities).		122 668	49.68		49.68												49.68			
Total (A.1 + A.2)		240 193	97.28																	
<b>B. Non-taxonomy-eligible activities</b>																				
Capital expenditures from non-taxonomy eligible activities		6 716	2.72																	
Total (A + B)		246 909	100																	



## Accounting principles

The basis for calculating the Capex KPI was capital expenditures recognized in the financial statements in accordance with applicable International Reporting Standards (IFRS). The denominator of the Capex KPI was assigned costs accounted for based on:

- A. IAS 16 Property, Plant and Equipment, paragraphs 73(e)(i) and (iii);
- B. IAS 38 Intangible Assets, paragraph 118(e)(i);
- C. IAS 40 Investment Property, paragraphs 76(a) and (b) (for the fair value model);
- D. IAS 40 Investment Property, paragraphs 79(d)(i) and (ii) (for the cost model);
- E. IAS 41 Agriculture, paragraphs 50(b) and (e);
- F. IFRS 16 Leases, paragraph 53(h).



## Information on assessment of compliance with Regulation (EU) 2020/852

The various categories of Echo Investment Group's capital expenditures were analyzed according to the records to determine whether they meet one of the following conditions:

- a. they involve assets or processes related to business activities consistent with the taxonomy:

The Echo Investment Group has incurred expenses from activities in accordance with the systematics. Capital expenditures related to with the activity 7.7 Acquisition and ownership of buildings, as related to taxonomy-qualifying activities.

- b. they are part of a plan to expand business activities that comply with the systematics or to enable business activities that qualify for the systematics to comply with the systematics:

The Echo Investment Group does not have a plan for capital expenditures as referred to in Section 1.1.2.2 of Annex I to EU Regulation 2021/2178.

- c. they relate to purchasing products from economic activities in accordance with the systematics and individual measures that enable the targeted activity to become low-carbon or enable it to reduce greenhouse gas emissions, in particular the activities listed in paragraphs 7.3 to 7.6 of Annex I to the Climate Delegated Act, as well as other economic activities listed in delegated acts adopted pursuant to Article 10(3), Article 11(3), Article 12(2), Article 13(2), Article 14(2) or Article 15(2) of Regulation (EU) 2020/852, and provided that the measures are implemented and operational within 18 months.

The analyses identified costs related to purchasing the products and individual measures enabling the target activity to become low-carbon or enabling it to reduce greenhouse gas emissions purchased from taxonomy-eligible activities. The activities from which the products were purchased were analyzed in terms of the technical criteria set forth in EU Regulation 2021/2139. The results of the assessment were the basis for determining the connection of capital expenditures with environmentally sustainable activities in the scope of the activity 7.7 Acquisition and ownership of buildings (consistent with the systematics). The Group identified more than PLN 117 million of capital expenditures allocated to both technically compliant and environmentally sustainable activities.



## Context information

As part of systematic-eligible and environmentally sustainable activities, costs of the activity 6.5 are listed. Transportation by motorcycles, passenger cars and light commercial vehicles and 7.7 Acquisition and ownership of buildings meet the technical criteria for qualification as taxonomy-eligible activities. Under the activity 7.7, the Echo Group also conducts environmentally sustainable activities that affect climate change mitigation.

# KPI Opex

Business activities (data in PLN)	Code	Operational expenses in absolute terms	Percentage share of operational expenditures	Criteria for significant contribution						Criteria "Do not do serious damage"						2023		Category (support activities)	Category (transition activities)	
				Climate change mitigation	Adaptation to climate change	Sustainable use and protection of water and marine resources	Transitioning to circular economy	Pollution prevention and control	Protection and restoration of biodiversity and ecosystems	Climate change mitigation	Adaptation to climate change	Sustainable use and protection of water and marine resources	Transitioning to circular economy	Pollution prevention and control	Protection and restoration of biodiversity and ecosystems	Minimum safeguards	Share of taxonomy-compliant activities in operational expenses			Share of taxonomy-compliant activities in operational expenses
		PLN thous.	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	%	%	%
A. Taxonomy-eligible activities																				
A.1. Environmentally sustainable activities (consistent with taxonomy)																				
Operational expenses from environmentally sustainable activities (consistent with taxonomy) (A.1)		0	0	0	0	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0			
A.2 Taxonomy-eligible activities but not environmentally sustainable activities (non-taxonomy-compliant activities)																				
Transportation by motorcycles, passenger cars and commercial vehicles	6.5	183	12.22	0	0	0	0	0	0	Y	Y	N/A	N/A	N/A	N/A	Y	12.22			
Renovation of existing buildings	7.2	863	57.50	0	0	0	0	0	0	Y	Y	N/A	N/A	N/A	N/A	Y	57.50			
Acquisition and ownership of buildings (here lease)	7.7	404	26.88	0	0	0	0	0	0	Y	Y	N/A	N/A	N/A	N/A	Y	26.88			
Total: Operating expenses from taxonomy-eligible activities but not environmentally sustainable activities (non-taxonomy-eligible activities)		1 450	96.6	0	0	0	0	0	0								96.6			
Total (A.1 + A.2)		1 450	96,6	0	0	0	0	0	0								96..			
B. Non-taxonomy-eligible activities																				
Operating expenses from non-taxonomy eligible activities		51	3.4																	
Total (A + B)		1 501	100																	





## Accounting principles

The key performance indicator for operational expenses was based on operational expenses recognized in the financial statements in accordance with applicable International Reporting Standards (IFRS). The denominator of the Opex KPI was mainly attributed to the costs of office renovations or car repairs and maintenance.

The activities from which the products were purchased were analyzed in terms of the technical criteria set forth in EU Regulation 2021/2139. The results of the assessment carried out were the basis for determining that operational expenses were not related to environmentally sustainable activities (in accordance with the systematics).



## Information on assessment of compliance with Regulation (EU) 2020/852

The Echo Investment Group has reported operational costs related to its operations according to a systematic framework that lists the following activities: the activities 6.5 Transportation by motorcycles, passenger cars and commercial vehicles, 7.2 Renovation of existing buildings, and 7.7 Acquisition and ownership of property and buildings.

Therefore, there is a separation of operational expenses which:

- a. they are related to taxonomy-eligible activities;
- b. they are part of a plan to expand systematics-eligible business or enable systematics-eligible business..

The Echo Investment Group does not have a plan for capital expenditures, as referred to in in Section 1.1.2.2 of Annex I to EU Regulation 2021/2178.

- c. they relate to purchasing the products of economic activities in accordance with the systematics and individual measures that enable the targeted activity to become low-carbon or enable it to reduce greenhouse gas emissions, in particular the activities listed in paragraphs 7.3 to 7. 6 of Annex I to the Climate Delegated Act, as well as other economic activities listed in delegated acts adopted pursuant to Article 10(3), Article 11(3), Article 12(2), Article 13(2), Article 14(2) or Article 15(2) of Regulation (EU) 2020/852, and provided that the measures are implemented and operational within 18 months.

The analyses did not identify costs related to purchasing the products and individual measures that enable the target business to become low-carbon or enable it to reduce greenhouse gas emissions purchased from activities that qualify for the systematics or comply with the systematics.



## Context information

Not applicable. No operating expenses related to environmentally sustainable activities (in line with the systematics) have been identified.

03

For  
people

We are a good, fair and stable employer. We value our employees' competencies, want to use their potential, give them opportunities for development, and provide them with space to realize themselves outside of work. We take responsibility for all the people who work in our offices, as well as on our construction sites: their safety, health and well-being.

We are supported in achieving our goals by a step-by-step roadmap guiding the Group to provide its employees with equal development opportunities, gender pay balance and maximize safety at construction sites.

We also focus on the trust, health and comfort of our clients. The starting point to building relationships with clients is for us to concentrate on their needs, which gives us a guarantee that places for living, working and leisure that we design fully respond to them.

## Our ambitions by 2030:

### Equal opportunities and good working conditions for Echo and Archicom employees:



equal access to promotions: women and men will each hold 45-55 percent of key directorships



women will constitute a minimum of 40 percent of the Supervisory Boards of each company, or a minimum of 33 percent of the Supervisory Boards and Management Boards counted together



average number of unused leave days per person at the end of the year will drop to 10



achieving gender balance in salaries for similar positions and responsibilities

### Safety and good working conditions at construction sites:



zero fatal accidents



implementation of high standards of social facilities on all construction sites



measuring and increasing satisfaction of construction workers



preparation and implementation of rules for handling complaints from neighbors

# Group's own employees

ESRS S1

One of the main pillars of our ESG approach is the creation of stable workplaces based on the principles of diversity, equality and safety. We are committed to eliminating the gender pay gap and transparently setting compensation for employees. These are key elements of our strategy to increase trust and team loyalty.

Employee turnover is an opportunity for fresh insights and growth. In our operations, we strive to create an atmosphere where employees feel valued and their skills are developed through systematic training and development programs. We also support employees who return after a long break, enabling them to reintegrate smoothly into their team.

By introducing a long-term bonus program, we not only motivate employees to achieve long-term goals, but also shape a corporate culture based on our joint success. However, our commitment does not end with social benefits. We care about the development and well-being of our employees, also focusing on caring for their mental and physical health, as well as engaging those willing to participate in social activities that support local initiatives.





# About our employees

ESRS S1-6, ESRS S1-7, ESRS S1-9

## Characteristics of employees, non-employees who constitute their own employees and diversity indicators

As of 2021, the Echo Investment Group consists of two entities - Echo Investment and Archicom - which have more than 30 years of experience in the Polish real estate market. Over these years, our employees have collected and developed knowledge of the main segments of the real estate market through the completion of property development projects in dozens of cities in Poland. Our employees are the most important asset for the future of the Group. We take care to give them a chance to further develop and strengthen their competencies.

### In brief

#### Material topic due to double materiality study

Scope	(S) social
ESRS	Own workforce
Material topic	<b>Working conditions</b>
Impact description	<b>Long-term employment stability</b>
Impact assessment	<b>Positive</b> , existing
Responsibility	Director of the HR Department
Scope	Own employees hired under employment contracts



## Echo Investment Group's disclosures on material topic

<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>• Work regulations and their appendices</li> <li>• Remuneration and bonus regulations at the Echo Investment Group companies</li> <li>• Sustainable development strategy</li> </ul> <p>The policy based on these documents ensures compliance with all legal requirements and the maintenance of adequate resources to carry out the Group's business activities.</p>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>• Annual development talks</li> <li>• Ethics training</li> <li>• Proper communication and smooth implementation of organizational changes</li> </ul> <ul style="list-style-type: none"> <li>• No significant financial outlay</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>• Aligning employment with business needs in the context of the Group's business goals for a given year</li> <li>• Keeping the Group's workforce stable</li> <li>• Smooth implementation of organizational changes in the Group, while ensuring business continuity and adequate personnel</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	<p>ESRS S1-6 — Characteristics of employees          ESRS S1-7 — Characteristics of non-employees who are own employees</p> <ul style="list-style-type: none"> <li>• Employee turnover rate</li> <li>• Average seniority rate</li> </ul>

In 2023, a significant event for the Group was the transfer of Echo Investment's residential part - including projects and related employees - to Archicom, which thus concentrated all of the Group's residential construction and sales activities. The change affected 120 people, but did not significantly affect the overall workforce across the Group.



# Echo Investment Group's own employees

All figures below are for people employed, without conversion to full-time equivalents (FTE - 8 hours per day, 40 hours per week).

## Number of own employees

Gender	as of 31 December 2022	as of 31 December 2023
Female	362	347
Male	308	284
Gender not reported	0	0
Total employees	670	631
	<b>2022</b>	<b>2023</b>
Ratio of number of employees to the Group's assets expressed in PLN million (x 100)	11.01	10.57
Ratio of number of employees to the Group's net profit expressed in PLN million (x 100)	527.56	478.03

2023

Female	Male	Gender not reported	Total
Total number of employees			
347	284	0	631
Number of employees with contracts for an unspecified period (permanent)*			
271	246	0	517
Number of employees with contracts for a specified period (fixed-term)*			
76	38	0	114
Number of full-time employees**			
339	276	0	615
Number of part-time employees			
8	8	0	16

\* To simplify, for permanent employees (employed for an indefinite period), the Group has classified employees on permanent employment contracts and all those employed under civil law contracts. This is due to the fact that it is not possible to show the expected duration of civil-law contracts, these employees generally provide work on a long-term basis or on terms similar to an employment contract for an indefinite period, and the scale of any deviations from this assumption is, according to the Group's assessment, insignificant. They are primarily qualified professionals and experts who provide consulting services and lawyers, who have statutory restrictions on their ability to work on a full-time basis. However, the formal relationship does not change the way they are treated - all those who provide work for us, regardless of the type of contract, have similar rights, responsibilities or access to benefits.

\*\* It has been assumed that employees with civil law contracts, mandate contracts and employees provided by an employment agency perform work on a full-time basis. Employees providing work under other contracts (mandates or provided by an employment agency) were classified as temporary.

2022

Female	Male	Gender not reported	Total
Total number of employees			
362	308	0	670
Number of employees with contracts for an unspecified period (permanent)*			
290	266	0	556
Number of employees with contracts for a specified period (fixed-term)*			
72	42	0	114
Number of full-time employees**			
348	282	0	630
Number of part-time employees			
14	26	0	40

\* For simplification, the Group has classified employees with employment contracts for an indefinite period of time and all those employed under civil law contracts as permanent employees (employed for an indefinite period of time). This is due to the fact that it is not possible to show the expected duration of civil-law contracts, these employees generally provide work on a long-term basis or on terms similar to an employment contract for an indefinite period, and the scale of any deviations from this assumption is, according to the Group's assessment, insignificant. They are primarily qualified professionals and experts who provide consulting services and lawyers, who have statutory restrictions on their ability to work on a full-time basis. However, the formal relationship does not change the way they are treated - all those who provide work for us, regardless of the type of contract, have similar rights, responsibilities or access to benefits.

\*\* It is assumed that employees with civil law contracts, mandate contracts and employees provided by an employment agency perform full-time work.

## Number of employees with employment contracts who left the Group during the year

	2022	2023
Number of employees who left their jobs	163	98
Employee turnover indicator	26.9%*	17.82%

\* The employee turnover indicator presented in the 2022 report was 0.27. The change is due to a modification of the presentation (the current indicator is the same as last year's, but multiplied by 100 percent, in accordance with ESRS guidelines). The higher turnover indicator in 2022 is a result of the layoffs.

The gender category "other" does not apply because Polish regulations do not provide for it.

All employees are based in Poland and perform their duties in Poland.

In accordance with the methodology required by the ESRS, temporary employees include employees working under probationary and fixed-term contracts. The Group's practice is to hire new employees for a trial period of 3 months and then for a fixed-term period of 12 months. After this time, the employee is usually hired on a contract for an indefinite term.

The Group does not hire employees who are not guaranteed specific working hours.

The employee turnover indicator is calculated according to the formula: (number of employees who left the Group voluntarily, as a result of dismissal, retirement or death / number of all Group employees at the end of the reporting period) x 100%.



## Own employees by gender

	as of 31 December 2022	as of 31 December 2023
	Number of employees	
Female	362	347
Male	308	284
Gender not reported	0	0
<b>Total</b>	<b>670</b>	<b>631</b>

## Own employees by age

	as of 31 December 2022	as of 31 December 2023
	Number of employees	
Under 30 years	131*	108
30-50 years	425*	413
Over 50 years	114*	110
<b>Total</b>	<b>670</b>	<b>631</b>

\* Due to the lack of precise data, about 9% of own employees (those on civil law contracts) were assigned to the category in proportion to the age structure of employees with civil law contracts at the end of 2023.



## Own employees by type of contract

### Employment contract

	as of 31 December 2022	as of 31 December 2023
	<b>Number of employees</b>	
<b>Total</b>	<b>607</b>	<b>550</b>
Female	348	321
Male	259	229
Gender not reported	0	0
Under 30 years	129	92
30-50 years	392	377
Over 50 years	86	81

### Permanent employment contract

	as of 31 December 2022	as of 31 December 2023
	<b>Number of employees</b>	
<b>Total</b>	<b>494</b>	<b>459</b>
Female	277	257
Male	217	202
Gender not reported	0	0
Under 30 years	No data	66
30-50 years	No data	323
Over 50 years	No data	70

## Fixed-term employment contract

	as of 31 December 2022	as of 31 December 2023
	<b>Number of employees</b>	
<b>Total</b>	<b>113</b>	<b>91</b>
Female	71	64
Male	42	27
Gender not reported	0	0
Under 30 years	No data	26
30-50 years	No data	51
Over 50 years	No data	14

## Civil law contracts\*

	as of 31 December 2022	as of 31 December 2023
	<b>Number of employees</b>	
<b>Total</b>	<b>61</b>	<b>58</b>
Female	13	14
Male	48	44
Gender not reported	0	0
Under 30 years	No data	1
30-50 years	No data	31
Over 50 years	No data	26

\* Primarily service contracts with sole proprietorships, as well as managerial contracts and appointments.

**Other contracts\***

	as of 31 December 2022	as of 31 December 2023
	<b>Number of employees</b>	
<b>Total</b>	<b>2</b>	<b>23</b>
Female	1	12
Male	1	11
Gender not reported	0	0
Under 30 years	1	15
30-50 years	1	5
Over 50 years	0	3

\* Mandate contracts and employees provided by an employment agency. The category was not reported in 2022, the data presented for this year may be incomplete, but any differences are assessed by the Group as insignificant.







## Methodology of data presentation

The change in the reporting standard from GRI to ESRS has resulted in a different methodology for presenting own employees. The numbers for 2022 are consistent with those presented in the Group's 2022 Sustainability Report, although they are included in different categories. Below we provide an explanation of the methodology used in this report.

All figures presented are for the number of people, without conversion to full-time equivalent (FTE - 8 hours per day, 40 hours per week).

### Own employees

- all persons providing exclusive work for the Group, including under employment contracts, civil law contracts, long-term mandate contracts, as well as those provided by an employment agency.

### Permanent employees

- persons providing work on the basis of employment contracts for an indefinite period and civil law contracts.

### Temporary employees

- persons providing work on the basis of fixed-term contracts, such as contracts of employment for a specified period and mandate contracts, as well as persons provided by the employment agency. Within this group of employees, 83 percent are employed on the basis of an employment contract. The Group's policy is to hire employees under employment contracts for a specified period, which is usually transformed into a contract for an unspecified period after the expiration of the period specified in the labor law.

### Employees combining employment contracts

A person employed part-time in different Group companies is shown as employed only in the company where he/she has the largest part-time share. If they are equal parts in different entities - they are assigned to the company with which they are more closely associated (length of employment or responsibility). If such assignment is not possible, the employee is shown in the higher-level company. If the total working dimension in different entities, but only within Echo Investment or only within Archicom, is full-time, the employee is presented as full-time. If the total working hours are full-time, but divided between entities that are part of both Echo Investment and Archicom, then the employee is presented as part-time. However, these are few cases, not relevant to this presentation.

### Employees combining employment contracts and other contracts

A person employed in various Group companies under an employment contract and another contract is presented only as a full-time employee. If his/her contracts concern only Echo Investment entities or only Archicom entities, he/she is presented as a full-time employee. If the contracts concern both Echo Investment and Archicom entities, the employee is presented as a part-time employee (even if the total scope of work performed is close to full-time).

There are no employees in the Group who do not have guaranteed working hours.

# Employee turnover

## Total number of new contracted employees

	2022		2023	
	No.	%	No.	%
<b>Employed staff, including</b>	83	100%	90	100%
Female	49	59%	66	73%
Male	34	41%	24	27%
Gender not reported	0	0	0	0
Under 30 years	34	41%	48	53%
30-50 years	42	51%	40	45%
Over 50 years	7	8%	2	2%

## Rate of new hires based on employment contracts

	2022	2023
Total	13.7%	16.4%
Female	8.1%	5.8%
Male	5.6%	2.1%
Gender not reported	0	0
Under 30 years	5.6%	8.7%
30-50 years	6.9%	7.3%
Over 50 years	1.1%	0.4%

The indicator is calculated according to the formula: (number of new employees in the group / number of all employees at the end of the year) multiplied by 100.

## Total number of contracted employees who left their jobs

	2022		2023	
	No.	%	No.	%
Employees who left their jobs, including	163	100%	98	100%
Female	112	69%	59	60.8%
Male	51	31%	39	39.7%
Gender not reported	0	0	0	0
Under 30 years	41	25%	24	24.4%
30-50 years	104	64%	62	63.2%
Over 50 years	18	11%	12	12.2%

## Rate of contracted employees who left their jobs - employee turnover indicator of contracted employees

	2022	2023
Total	26.9%	17.82%
Female	18.5%	10.7%
Male	8.4%	7.1%
Gender not reported	0	0
Under 30 years	6.8%	4.4%
30-50 years	17.1%	11.3%
Over 50 years	3.0%	2.2%

The indicator is calculated according to the formula: (number of contracted employees who left the group/number of all contracted employees at the end of the year) multiplied by 100. The indicator includes employees who left their jobs in a given year by mutual agreement, were dismissed, retired or died.

The turnover indicator of contracted employees was significantly affected by the work reorganization of the various entities in the Group. Excluding this factor, the turnover indicator is 14.4 percent.

## Average seniority of contracted employees (in years)

	2022	2023
Total	6.7	6.6
Under 30 years	6.4	5.2
30-50 years	7.1	8.5
Over 50 years	0	0

### Methodology adopted



The statistics on new hires, turnover and seniority are based on contracted employees (temporary and permanent) and are therefore not the same as the Group's own total employee count. This is due to the new methodology for counting employees, which is different in the ESRS standard than in the previously used GRI standard. The Group will completely align its reporting with the standard required by ESRS in the future. At the same time, according to the Group's assessment, the indicators based on employees with employment contracts show the correct trends, as this category of own employees describes 87 percent of the Group's total own employees as of 31 December 2023.

## Persons with disabilities

ESRS S1-12

### Proportion of own employees with disabilities

	2022		2023	
	No.	%	No.	%
<b>Total</b>	8	1.1%	10	1.6%
Female	5	0.7%	7	1.1%
Male	3	0.4%	3	0.5%
Gender not reported	0	0	0	0



# Adequate salaries and remuneration ratios

ESRS S1-10, ESRS S1-16

## Employee salary determination process

The principles for ensuring competitive salaries in relation to job offers in other companies are set forth in Echo Investment's Remuneration Policy. According to it, employees are remunerated in a way that takes into account the importance of their position and their skills and competencies. The adopted remuneration policy allows us to build a team of loyal and motivated employees.

Each employee's remuneration is based on his/her role in the organization and the assessment of his/her individual performance. The basis of fair remuneration is the valuation of positions: positions that involve greater responsibility are better paid. Employees' salaries do not depend in any way on the gender, age, nationality or seniority of persons employed.

Salaries are determined individually for each employee within salary ranges. The salary ranges are determined on the basis of market data received from specialized companies and amount to 80-120 percent of the median salary in the market. The salary consists of a fixed part and a bonus, which every employee has a chance to receive. Bonuses directly related to sales are generally paid on a monthly or quarterly basis, while other departments received their annual bonus depending on the achievement of individual goals and the overall annual result of the organization.

### Ratio of the total annual compensation of the best-paid person\* in the Group to the median annual total compensation for all employees and associates\*\* (excluding the best-paid person)

2022	2023
43	48

\* The remuneration of the top earner in the Echo Investment Group, according to the remuneration report of the Management Board and Supervisory Board, consists of the sum of all components, i.e. base salary, bonuses, fringe benefits.

\*\* The compensation of employees and associates, according to the compensation report of the Management Board and Supervisory Board, consists of the average annual compensation of employees who are not members of the Management Board or Supervisory Board on a full-time equivalent basis.



# Position valuation and salary calibration

Each position in the Group has a specific valuation and salary range. We make sure that individual salaries within a salary range are differentiated only by competence and quality of work, and not by gender, nationality or other personal criteria. We began the process of valuing positions and calibrating salaries in 2017. As a result, we were able to significantly reduce salary differences for positions of similar value to the Group. The process also allowed to reduce pay differences between men and women who occupy similarly valued positions.

The HR Director is responsible for the salary determination process. External consultants are engaged for the salary determination process. Stakeholders are not involved in the process.

## Ratio of women's basic salaries to men's salaries - for employees hired on the basis of employment contracts

	as of 31 December 2022	as of 31 December 2023
Total	PLN 9 565	PLN 10 663
Female	PLN 8 045	PLN 9 323
Male	PLN 11 410	PLN 12 541
Gender not reported	0	0
Ratio of women's salary to men's salary	70.5%	74.3%





## Methodology adopted

The indicator is calculated on the basis of the arithmetic average of the base salaries of employees with employment contracts in Group companies. For statistics, members of the Management Boards and inactive employees are not taken into account. In the case of part-time employees, the amount of salary proportionally converted to full-time is taken into account for the statistics.

The differences between the average salaries of men and women overall in the Group are due to the structure of employment and the labor market. A significant part of the workforce is composed of engineers, who - due to their high level of responsibility - are highly paid in the market. Taking into account the specifics of the labor market and technical education in Poland, the overwhelming proportion of engineers are men. For this reason, the issue of equal remuneration in the Group should be analyzed on the basis of position valuation described below. The valuation of positions significantly bridges the differences resulting from the specifics of the labor market and assesses positions through the prism of their responsibility (including financial), the scope of tasks performed, the size of the team managed and the impact on the implementation of the Group's strategy.

### Ratio of women's salaries to those of men occupying similarly valued positions in the Group - to staff with employment contracts\* as of the end of 2023 (in percent)

	Basic salary	Total remuneration
Specialists	90%	97%
Experts	82%	82%
Managers	90%	89%
Directors	75%	61%

\* Also applies to individuals who are employed by various Group companies under employment contracts and other contracts (mainly civil contracts).



## Strategic goal

The Group's goal under the ESG Strategy is to close the gender pay gap. The gender pay indicator (calculated for specific job levels according to the Kornferry Hay method) in 2029 should be no higher than 5 p.p. The goal for 2023 was to set a starting level; the goal for 2024 is to reduce the gap to no more than 10 p.p.

The Group also offers its employees a non-payroll benefit system.



life and health insurance



private medical care



internal and external specialized training



retirement benefits



fixed budget to be used for recreation and culture



subsidies for sports activities



opportunity to purchase products at a discount from our contractors



special and random allowances from the Employee Benefit Fund



teambuilding events

Most benefits are also available to our employees with contracts other than employment contracts.



# Taking actions on material impacts on its own employees

ESRS2 SBM-3, ESRS S1-4

Based on the double materiality study, its own experience and knowledge, the Group analyzes and continuously monitors potential risks and opportunities for the following groups of employees and actively manages these risks and seeks to seize opportunities.

Group	Impact	Risk/ opportunity	Method of managing risks and exploiting opportunities, approach
All own employees	Positive, existing	Employment stability	<ul style="list-style-type: none"> <li>Seizing the opportunity to build diverse teams</li> <li>Employer branding using long average seniority information</li> </ul>
All own employees	Positive, existing	Dialogue with employees	<ul style="list-style-type: none"> <li>Maintaining an ongoing dialogue with employees as part of strengthening human resources and eliminating unwanted events</li> </ul>
All own employees	Positive, existing	Work-life balance	<ul style="list-style-type: none"> <li>Providing a benefit system for its own employees</li> <li>ESG strategy goal of using rest leave</li> </ul>
Women	Negative, existing	Discrimination in promotions, development and pay opportunities	<ul style="list-style-type: none"> <li>EU goal of increasing women's representation in corporate bodies</li> <li>ESG strategy goal of equalizing the share of women in managerial positions</li> <li>Tracking the pay gap</li> <li>ESG strategy goal of closing the pay</li> </ul>
All own employees	Positive, existing	Training and skill development	<ul style="list-style-type: none"> <li>Annual training program</li> </ul>
Employees performing tasks at construction sites (workers in the supply chain)	Negative, potential	OSH, accident risks	<ul style="list-style-type: none"> <li>Consistent OSH system at construction sites</li> <li>Constant monitoring of accident rates</li> <li>Training programs</li> </ul>

In terms of exposure to various risk factors, working at the Echo Investment Group is similar for all employees. The Group and its operations are concentrated in Poland, where hiring and work culture, as well as legal requirements and their enforcement, are uniform. In the dual materiality study, the Group has identified one group among its own employees that is more vulnerable to harm than others - women (in the context of equal pay and presence in management and supervisory bodies). The Group also has not identified any material risks to its own employees that arise directly or indirectly from its strategy and business model.

The double materiality study has not indicated that the Group has had a general or systemic material negative impact on any category of its own employees, or that the material negative impact is related to any individual event. The Group has not identified operations at significant risk of incidents of forced labor, compulsory labor or child labor.

The Group has not yet developed a transformation plan, so it is not in a position to assess the possible impact of the transformation plan on its own employees or those in the supply chain.

The Group tracks and evaluates the effectiveness of activities and initiatives aimed primarily at ensuring positive impacts on its own employees by managing specific areas of HR, such as employment status, training, compensation or gender equality - as part of established HR annual plans and ongoing business needs. Determining the

appropriate and necessary actions in response to specific actual or potential negative impacts on one's own employees is the responsibility of the HR Director and is based on his expertise and experience. It is also the responsibility of the HR Director to analyze whether the Group's practices do not cause or contribute to significant negative impacts on its own employees.

The HR Director provides regular updates to the Management Board on the following issues related to the impact on employees:

- analysis of salaries and their competitiveness (1-2 times a year),
- current information on dialogue with employees, employee representatives, problems raised by employees, OSH issues,
- monitoring the use of leave,
- analysis of the gender pay gap level and access to managerial positions,
- monitoring and reporting on the development agenda for the organization.

In the future, the Group will analyze its process for managing the significant impact on employees against the requirements of the ESRS and present the results of this analysis in a subsequent report.



# Interests and opinions of stakeholders

ESRS2 SBM-2

## Employee consultation on strategy and business model impact

The Group's Management Board does not consult with employee representatives or directly with employees on issues of its strategy and business model. The Group recognizes that the strategy and business model are the responsibility of the Management Board, which includes ensuring stable and effective personnel management.

The HR Director participates in all strategic processes in the Group and his voice - as a representative of employees - is taken into account in strategic decisions. His task is to assess the impact of planned decisions on employees and to present their perspective to the Management Board - especially if the issues are related to the strategy and business model, and have a direct, material impact on employee issues, including - they pose a risk to respect for human rights. In 2023, such a situation occurred during organizational changes in the Group - the transfer of residential projects and the employees responsible for them from Echo Investment to Archicom. The Management Board, with the support of the HR Director, was responsible for creating new, effective structures in both entities, as well as ensuring that all labor rights were respected.

The Group is not party to any global framework agreements or other agreements with employee representatives regarding respect for the human rights of its own employees. The Group's business model and strategy are based on its operations in different segments of the real estate market, which tend to have different business cycles and dynamics. In addition, the Group's employee management policy promotes the cooperation of individuals with different competencies, the exchange of knowledge and flexibility for employees to take on tasks from new domains. This approach reduces the risk of sudden organizational changes and deterioration of working conditions.



# Procedures for working with own employees and employee representatives

## In brief

### Material topic due to double materiality study

<b>Scope</b>	(S) social
<b>ESRS</b>	S1 Own workforce
<b>Material topic</b>	<b>Working conditions</b>
<b>Impact description</b>	<b>Conducting dialogue with employees</b>
<b>Impact assessment</b>	<b>Positive</b> , existing
<b>Responsibility</b>	Director of the HR Department
<b>Scope</b>	Employee representatives, own employees hired under employment contracts, to a limited extent persons providing work for the Group under other contracts

### Echo Investment Group's disclosures on the material topic

<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>• Labor Code</li> <li>• Code of Conduct</li> </ul> <p>No defined policy. The policy, based on these documents, ensures compliance with legal requirements. It also supports employee retention.</p>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>• Actions of employee representatives</li> <li>• Conducted elections for employee representatives in two companies</li> <li>• Plan to regulate cooperation with employee representatives in the form of regulations or policies</li> <li>• No significant financial outlay</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>• Compliance of the Group's operations with minimal legal requirements</li> <li>• No other defined goals</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	<p>ESRS S1-8 — Scope of collective bargaining and social dialogue</p> <ul style="list-style-type: none"> <li>• List of issues consulted by employee representatives</li> </ul>



There are six companies in the Echo Investment Group that, due to the size and nature of their employment and legal as well as administrative requirements, have employee representatives:

- Echo Investment S.A.,
- Echo Investment ACC — Grupa Echo Sp. z o.o. Sp.k.,
- Archicom S.A.,
- Archicom Asset Management Sp. z o.o.,
- Archicom Sp. z o.o. Realizacja Inwestycji Sp.k.,
- CitySpace Management Sp. z o.o.

The aforementioned companies employed 549 people under contract as of December 31, 2023, which means that nearly 100 percent of the Group's employees under employment contracts and 87 percent of the Group's own employees have their representatives.

These bodies, as a rule, represent directly employed workers, however, in their decisions they also take into account interests of those providing work under other contracts - in particular, civil law contracts.

Employee representatives were elected in a free election by the employees of their companies for a three-year term. In 2023, elections were held for the works council at CitySpace Management Ltd. and midterm elections at Archicom Asset Management Ltd. As of 31 December 2023, two Group companies have incomplete representation - two members each. The Group plans to conduct midterm elections in 2024.



### Diversity of employee representatives in the Group by gender [in percent]

	as of 31 December 2022	as of 31 December 2023
Total	100%	100%
Women	73.3%	75.0%
Men	26.7%	25.08%
Gender not reported	0	0

The gender category "other" does not apply because the Polish law does not provide for it.

### Diversity of employee representatives in the Group by age [in percent]

	as of 31 December 2022	as of 31 December 2023
Total	100%	100%
Under 30 years	13.3%	6.25%
30-50 years	66.7%	81.25%
Over 50 years	20%	12.5%

The Group does not have a formalized, separate procedure for cooperation with employees and employee representatives. However, it consults with employee representatives on planned actions that significantly affect work - particularly issues required by labor law. Consultations may concern, among other things, organizational changes (consultations in connection with the strategy or business model), or current issues in the field of working conditions, OSH (consultations related to an actual, direct impact on employees). The dialogue with employee representatives is initiated in response to legal requirements and stakeholder requests. The Group does not have a regular dialogue with employee representatives. In 2024, the Group plans to develop and implement a document (bylaws or policies) governing cooperation with employee representatives.

The topic of consulting with employees regarding the impact on the strategy and business model is detailed in Chapter 1 of the report, in the ESRS S1-8 indicator.

Despite the lack of a formalized procedure, the Group's Management strives to cooperate with employee representatives and take into account comments and issues raised by them.

### Topics consulted with employee representatives in 2023

Topic	Scope	Consultation results
Introduction of Remote Work Regulations	All companies	Obtaining approval for proposed solutions.
Employee Benefit Fund and income thresholds	All companies except CitySpace Management Ltd.	Developing decisions that were fully approved by the Management Board and implemented.
Working time settlement period was changed from 3 to 12 months (as part of the standardization of the Group)	Archicom companies	The level of consultation of solutions prepared by the Management Board. Consultations concluded with the signing of an agreement.





Depending on the type of issue, employee representatives usually have several days to analyze proposals and comment on them. They are also provided with the opportunity to discuss the proposals freely among themselves, during their regular working hours.

The Group does not systematically examine the effectiveness of cooperation with employee representatives. However, it evaluates it through:

1. direct results of the dialogue with employer representatives (obtained approvals of proposed solutions, possible objections or dissenting opinions);
2. ongoing monitoring of issues raised by employees with the Management Board, direct supervisors and representatives of the HR department;
3. employee turnover indicator tracking.

The Group does not take steps to gain insight into opinions of its own employees from groups that may be particularly vulnerable or marginalized (e.g., women, migrants, people with disabilities). The Management Board believes that the general policies in place are sufficient to solicit such opinions, and that the risk of not taking into account the opinions of vulnerable people is low.

The Group's HR Director, empowered by the Management Board, is responsible for dialogue and cooperation with employee representatives, or in certain situations directly with employees. This is part of his duties, as part of his broader scope of responsibility.

The HR Director participates in all strategic processes in the Group and his voice - as a representative of employees - is included in strategic decisions. His duty is to assess the impact of planned decisions on employees and to present their perspective to the Management Board - especially if the issues are related to the strategy and business model and have a direct, significant impact on labor issues, including - they pose a risk to respect for human rights. In 2023, such a situation occurred during organizational changes in the Group - the transfer of residential projects and employees responsible for them from Echo Investment to Archicom. The Management Boards of Archicom and Echo Investment, with the support of the HR Director, were responsible for creating a new, effective structures in both entities, as well as ensuring that all labor rights were respected.

There are no labor unions in the Group, and employees of the Group or any of its companies are not subject to collective bargaining agreements.



# Policies related to own workforce

ESRS2 MDR-P, ESRS S1-1

## Compliance with human rights

A key document relating to ethics and ensuring that human rights are respected among own employees in the Echo Investment Group is the Code of Conduct. It emphasizes the Group's commitments to human rights that are particularly relevant to its own employees: the requirements of respect, fair working conditions, compliance with conventions of the International Labor Organization, the right to whistleblowing or training, and prohibits forced or compulsory labor, child labor, illegal employment, human trafficking, violence and discrimination.

The Group's Code of Conduct affirms compliance with the UN Universal Declaration of Human Rights. The Group also adheres to principles formulated in other international documents such as the "UN Guiding Principles on Business and Human Rights," the "International Labor Organization Declaration on Fundamental Principles and Rights at Work," and the "OECD Guidelines for Multinational Enterprises". This fact is not explicitly expressed in the corporate documents of Group companies. The corresponding provisions will be introduced into them at the forthcoming revision of the entire labor rights compliance system.

The Group has its Safety Policy (part of the EHS Management System Book) in place. It covers all of the Group's own employees, those who perform work for the Group, as well as employees of companies that perform contracts for the Group - primarily construction, supervision, security, cleaning services, etc. The main purpose of this document is to prevent accidents at work.

All of the Group's policies related to the observance of labor rights apply to all of the Group's own employees (covered by ESRS S1), as well as those performing work for the Group.

The last revision of the Code of Conduct and related labor rights compliance documents took place in 2021. It resulted from the changing organizational structure and working conditions, as well as from cooperation with the Group's own employees. It took into account their insights and concerns, expressed, among other things, during the annual ethics training and examination.

## Remedies for human rights violations

The Group has a system of whistleblowing and whistleblower protection. This system allows its own employees to report - including anonymously - violations of human rights, for example, including labor rights. Each reported case is analyzed and explained, in accordance with internal procedures, by a specially appointed committee. Once a violation of law or internal rules is found, systemic causes of the situation are analyzed so that corrective measures can be implemented in cases that require it. Persons suspected of breaking laws or ethical rules are given the opportunity to give explanations. Once the employee is found to have misappropriated laws or rules, his or her employer (a Group company) holds him or her accountable, in accordance with the rules stipulated in the Labor Code. Depending on the nature of the employee's violation, the degree of the employee's guilt and his/her previous attitude to work, these sanctions range from admonishment, reprimands, fines to disciplinary dismissal. If a crime is suspected, the Group reports the case to law enforcement agencies.





## Policies related to own workforce

The Group does not have separate policies aimed solely at reducing direct or indirect discrimination (including harassment), promoting equal opportunities, other ways to increase diversity and inclusion. However, these issues are managed by other documents of corporate governance, primarily:

- Code of Conduct,
- Whistleblowing procedure,
- Recruitment and hiring procedure,
- Labor Regulations and their appendices 2 ("Equal treatment in employment" - in Echo Investment companies, and "Anti-mobbing and discrimination policy" - in Archicom companies).

These documents, especially the Labor Regulations, include equal treatment and protection for their own employees, regardless of gender, age, disability, race, religion, nationality, political beliefs, union affiliation, ethnicity, religion, sexual orientation, or type of employment. They also prohibit bullying and sexual harassment.

The documents do not explicitly identify issues such as promoting equal opportunities and other ways to enhance diversity and inclusion. The Group will consider supplementing its corporate governance with specific policies on reducing discrimination, promoting equal opportunities, other ways to increase diversity and inclusion among its own employees, or updating existing documents with these issues.

The Group has no specific inclusion obligations for persons from vulnerable groups among its own employees.

### Anti-discrimination policies

The Group's anti-discrimination policy is governed primarily by the Code of Conduct and the Labor Regulations and their appendices 2. The Group seeks to ensure its implementation through the following measures:

- annual mandatory training on knowledge of the Code of Conduct and other ethical principles for all employees, which is completed by examination;
- internal communication to promote the company's ethical principles and values (in-person meetings, intranet, mailings to employees);
- building an inclusive organizational culture and empathy among employees;
- having a transparent and prompt system for responding to whistleblowing, comprising the following elements::
  - a. effective whistleblowing system that protects whistleblowers, the whistleblowing procedure,
  - b. procedure for handling reports,
  - c. possibility of applying sanctions to those guilty of violating laws or ethical principles,
  - d. if necessary, a mechanism for recommending and implementing systemic corrective actions in the Group.

### Safety policy

The vast majority of the Group's own employees work in offices and are not exposed to significant health and life risks. They are all covered by a safety system defined by OSH laws and the internal Safety Policy. In 2023, 10 workplace accidents were reported among the Group's own employees, resulting in a total of 95 days of lost work.



## Processes for leveling negative impacts and channels for reporting problems by own employees

### In brief

#### Material topic due to double materiality study

<b>Scope</b>	(S) social
<b>ESRS</b>	S1 Own workforce
<b>Material topic</b>	<b>Equal treatment and equal opportunities</b>
<b>Impact description</b>	<b>Measures to prevent violence and harassment in the workplace</b>
<b>Impact assessment</b>	<b>Positive</b> , existing
<b>Responsibility</b>	Director of the Legal Department or Vice-President for finance (Echo Investment S.A.) and Member of the Management Board for compliance or Chairman of the Supervisory Board (Archicom S.A.),
<b>Scope</b>	Own employees hired under employment contracts, employees hired under other contracts

#### Echo Investment Group's disclosures on the material topic

<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>Code of Conduct</li> <li>Whistleblowing procedure</li> <li>Policy for handling whistleblowing reports</li> <li>Work regulations and their appendices 2</li> </ul> <p>Policies aimed at developing employee awareness, avoiding actions contrary to laws, internal procedures and ethics, as well as ensuring compliance with legal requirements.</p>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>Ethics training</li> <li>Ethics-oriented onboarding for all new employees</li> <li>Investigation of reported whistleblowing cases</li> <li>No significant financial outlay</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>100% of own employees trained in ethics</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	<p>1-17 - Incidents, complaints and serious impacts on respect for human rights</p> <ul style="list-style-type: none"> <li>Share of own employees trained in ethics</li> </ul>



## Whistleblowing channels

The Group allows its own employees to report any irregularities and suspicions, in order to monitor risks on an ongoing basis, improve the effectiveness of the compliance system, and enforce obligations flowing from the Code of Conduct and other ethics regulations.

The whistleblowing procedure applies to internal parties and is not made available to external parties: employees in the value chain, clients, affected communities. The Group will study the need to expand the system to include external stakeholders.

Any person who comes into possession of information about irregularities concerning the Group's operations, including breaches of the Code of Conduct or laws, should report it, while being protected from retaliation (including the possibility of anonymous reporting). The reports may concern, among other things:

- common law breaches,
- breach of the provisions of the Code of Conduct,
- breach of any other internal regulations, including but not limited to work regulations, safety procedures, financial and accounting procedures, and other procedures, policies, instructions and orders,
- all other situations that are inconsistent with the Group's policies.

Employees may also report any other situations that they believe are wrong or may have a negative impact on the Group, its employees and the external environment. Accordingly, the reports may concern manifestations of, among other things, discrimination, bullying, harassment and other breaches of labor relations, which are completely prohibited in the Group by common law, the Code of Conduct, labor regulations, other corporate documents, as well as by universal ethical standards.

Employees should also report situations of concern to them that may be irregularities, may violate any laws or protected interests of the Group and employees. They have the opportunity to seek advice or opinions on ethical issues from the Ethics Committee as well.

As a result of the investigation, the Group may impose the following sanctions on a person who has breached the law, internal procedures or ethical rules:

- reporting the case to law enforcement agencies,
- disciplinary dismissal,
- financial penalty,
- reprimand,
- rehabilitation measures - such as a referral for training,
- admonition,
- other corrective actions.

The Group provides the following channels for reporting irregularities:

1. directly to the supervisor,
2. to the Director of the legal department or the Vice-President for finance (at Echo Investment), and to the Management Board member for compliance or the Chairman of the Supervisory Board (at Archicom),
3. through the Ethics Line, an external company that accepts reports by phone or email (including anonymously).

In practice, employee-related breaches are also reported through the HR Director or HR Business Partner of a given business.

## Mechanism for handling whistleblowing reports

In the case of a report in which a potential negative impact on an employee or employees of the Group is identified, the Director of the Legal Department (or the Management Board Member responsible for compliance at Archicom) appoints an ad hoc team to analyze the information provided, and, if the breaches are confirmed, to recommend corrective actions within the company and determine sanctions for the ethical breacher. When selecting members of the team, competencies, specialization, the possibility of conflicts of interest and the level of trust of employees in a person are taken into account. External experts or auditors may also be involved in the team. As a rule, the composition of the ad hoc team need not be independent of the Management Board. In practice, it usually includes in it a representative of the Management Board who meets the above criteria.

The Management Board is informed of all critical problems that occur, including any reported breaches, the subsequent stages of the investigation and its results. A written report on the completed investigation is adopted by the team and presented to the President, or the Management Board - if the investigation involved a member of the Management Board.

Breaches concerning employee issues reported through the HR Director or HR Business Partner of a given business are handled in the same manner as other whistleblowing reports.

The Group promotes whistleblowing channels through, among other things, annual mandatory ethics training for employees and internal communication (a special tab with policies and procedures on the intranet). Whistleblowing channels are also part of each new employee's onboarding process.





## Protection of whistleblowers

The Group ensures that whistleblowers, including employee representatives, are protected from retaliation. This principle is explicitly expressed in the Code of Conduct, Whistleblower Procedure and Procedure for Handling Whistleblowing Reports:

- The Group guarantees that the report will not be the cause of adverse personnel decisions against the employee;
- The Group prohibits any retaliation against the whistleblower;
- The Group ensures that the identity of the anonymous whistleblower will not be the subject of findings in the investigation of the case;
- The Group ensures that the investigation will be conducted in a manner that does not allow the identity of the whistleblower to be revealed;
- The Group assures that if it asks the whistleblower to reveal his or her identity in the course of the investigation, then it will protect his or her identity, but will leave the final decision on disclosure to the the whistleblower.

The Group's existing mechanism for protecting whistleblowers from retaliation was designed based on the provisions of Directive (EU) 2019/1937 of the European Parliament and the Council on the protection of whistleblowers. The directive has not yet been transposed into Polish law.

## Report monitoring process

The whistleblower may receive information on the status of his or her report, as long as he or she left information on how to contact himself or herself or contacted through the Ethics Line when making the report. Feedback may be limited to the extent necessary to ensure the protection of sensitive data, including company secrets, clients and business partners.

ESRS S1-17

## Incidents, complaints and serious impacts on human rights

The Group assesses that thanks to effective communication, its employees are aware of the whistleblowing system. Employees have confidence in it and use it when necessary. In 2023, one case of whistleblowing was reported in the Group. It was analyzed and handled by the Group, in accordance with its procedures. The time from the report to the completion of the investigation was about 1 month. The Group does not monitor the level of satisfaction with the effectiveness of whistleblowing mechanisms, confidence in them, or the level of satisfaction with the processing of reports. However, the whistleblowing channel system is in line with the criteria for the performance of non-judicial complaint mechanisms contained in the UN Guiding Principles on Business and Human Rights (Principle 31).

# Work-life balance

ESRS S1-15

## In brief

### Material topic due to double materiality study

<b>Scope</b>	(S) social
<b>ESRS</b>	S1 Own workforce
<b>Material topic</b>	<b>Working conditions</b>
<b>Impact description</b>	<b>Work-life balance</b>
<b>Impact assessment</b>	<b>Positive</b> , existing
<b>Responsibility</b>	Director of the HR Department
<b>Scope</b>	Own employees hired under employment contracts, employees hired under other contracts

## Echo Investment Group's material topic disclosures

<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>• Labor Code</li> <li>• Sustainable Strategy of the Group</li> <li>• Work regulations</li> <li>• Regulations for remote working</li> </ul> <p>The policy is not written down, but is driven by the law and the ESG Strategy. It assumes raising the work-life balance by using employees' accrued leave in a timely manner, promoting longer leaves of absence. In addition, it aims to comply with legal requirements.</p>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>• Adoption of Regulations for remote working</li> <li>• No significant financial outlay</li> <li>• Achievement of policy goals reduces provisions for future benefits for Group employees</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>• End of 2023 - no unused leave days from 2022 (and earlier)</li> <li>• 2026 - a maximum of 10 unused leave days on average per employee</li> <li>• 2023 - 80 percent of employees who used their 2-week leave</li> <li>• 2025 - 100 percent of employees who used their 2-week leave</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	<p>ESRS S1-15 - Indicators of work-life balance</p> <ul style="list-style-type: none"> <li>• Own indicators: Number of leave days outstanding Percentage of employees who used their 2-week leave</li> </ul>

## Parental leave

We help balance professional and parental duties. We try to make it easier for parents to return to work after a long break due to taking care of a child.

### Employees with employment contracts, entitled to take parental leave

	2022	2023
Total	54	57
Female	36	43
Male	18	14
Gender not reported	0	0

### Employees with employment contracts who took parental leave

	2022	2023
Total	36	44
Female	36	43
Male	0	1
Gender not reported	0	0

### Parental leave utilization indicator [in percent]

	2022	2023
Total	67%	77%
Female	100%	100%
Male	0	7%
Gender not reported	0	0

### Employees with employment contracts who returned to work after parental leave

	2022	2023
Total	17	18
Female	17	21
Male	0	1
Gender not reported	0	0

The indicator is calculated using the formula: [number of employees (in a given group) who took parental leave in a given year / total number of employees, entitled to take parental leave] x 100.





**Employees with employment contracts who returned to work after parental leave in the previous year and were still employees of the Group after 12 months**

	2022	2023
Total	10	17
Female	10	16
Male	0	1
Gender not reported	0	0

Rest leave



**Strategic goal**

We ensure that the Group's employees use their annual leave to benefit their well-being, recovery and work efficiency. The Group's updated ESG strategy entails increased attention to analyzing the use of leave to which our employees are entitled. The goal is that in 2024 we will prepare and implement an incentive program that will reduce the Group's average number of unused leave days at the end of the year. The assumed target for 2026 is a maximum of 10 days of unused leave days on average per person at the end of the year. At the end of 2023, the average number of unused leave days per employee was 13 (excluding leave accrued by employees on long-term leave).



# Diversity indicators in management and supervisory bodies

ESRS S1-9

## In brief Material topic due to double materiality study

<b>Scope</b>	(S) social
<b>ESRS</b>	S1 Own workforce
<b>Material topic</b>	<b>Equal treatment and equal opportunities</b>
<b>Impact description</b>	<b>Low diversity in management and supervisory positions</b>
<b>Impact assessment</b>	<b>Negative</b> , existing
<b>Responsibility</b>	The Supervisory Board, the General Meeting of Shareholders
<b>Scope</b>	The Management Boards and Supervisory Boards of Echo Investment S.A. and Archicom S.A.

## Echo Investment Group's material topic disclosures

<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>Articles of Association of Echo Investment S.A.</li> <li>Articles of Association of Archicom S.A.</li> <li>Remuneration policy for members of the Management Board and Supervisory Board</li> <li>Sustainable Strategy of the Group</li> <li>Best Practices of Companies Listed on the WSE</li> </ul> <p>The policy is a result of the Group's bodies' growing awareness of the importance of diversity matters, as well as legal requirements. It focuses on gender diversity - Directive of the European Parliament and of the Council on improving gender balance among directors of listed companies.</p>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>Adoption of the Sustainable Strategy, which includes a plan to increase the representation of women in the bodies of Echo Investment S.A. and Archicom S.A.</li> <li>No significant financial outlay</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>2026 - a minimum of 40 percent in the Supervisory Board or a minimum of 33 percent in the Supervisory Board and the Management Board combined</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	<p>ESRS S1-9 - Diversity indicators ESRS S1-16 - Compensation indicators</p>

## Diversity of the Management Boards

### Diversity of the Management Boards by gender

	Echo Investment S.A.				Archicom S.A.			
	as of 31 December 2022		as of 31 December 2023		as of 31 December 2022		as of 31 December 2023	
	No.	%	No.	%	No.	%	No.	%
Female	1	20%	1	20%	1	25%	1	25%
Male	4	80%	4	80%	3	75%	3	75%
Gender not reported	0	0	0	0	0	0	0	0
Total	5	100%	5	100%	4	100%	4	100%

The gender category "other" does not apply because Polish law does not provide for it.

### Diversity of the Management Boards by age

	Echo Investment S.A.				Archicom S.A.			
	as of 31 December 2022		as of 31 December 2023		as of 31 December 2022		as of 31 December 2023	
	No.	%	No.	%	No.	%	No.	%
Under 30 years	0	0	0	0	0	0	0	0
30-50 years	2	40%	2	40%	3	75%	3	75%
Over 50 years	3	60%	3	60%	1	25%	1	25%
Total	5	100%	5	100%	4	100%	4	100%



## Diversity of the Management Boards by citizenship

	Echo Investment S.A.				Archicom S.A.			
	as of 31 December 2022		as of 31 December 2023		as of 31 December 2022		as of 31 December 2023	
	No.	%	No.	%	No.	%	No.	%
Polish	4	90%	4	90%	4	100%	4	100%
Swedish	1	10%	1	10%	0	0	0	0
Total	5	100%	5	100%	4	100%	4	100%

There were no changes in the composition of the Management Boards of the two companies in 2023. The Group's ESG Strategy, aims that by 2026 women will constitute at least 40 percent on each Supervisory Board or at least 33 percent on the Supervisory Board and the Management Board of a given company combined. In 2023, the diversity indicators by gender on both Management Boards remain unchanged, but the Management Board considers it possible to achieve the ESG Strategy goal.

## Diversity of the Supervisory Boards

### Diversity of the Supervisory Boards by gender

	Echo Investment S.A.				Archicom S.A.			
	as of 31 December 2022		as of 31 December 2023		as of 31 December 2022		as of 31 December 2023	
	No.	%	No.	%	No.	%	No.	%
Female	1	12,5%	1	12,5%	1	16,7%	1	14,3%
Male	7	87,5%	7	87,5%	5	83,3%	6	85,7%
Gender not reported	0	0	0	0	0	0	0	0
Total	8	100%	8	100%	6	100%	7	100%

The gender category "other" does not apply because Polish law does not provide for it.

### Diversity of the Supervisory Boards by age

	Echo Investment S.A.				Archicom S.A.			
	as of 31 December 2022		as of 31 December 2023		as of 31 December 2022		as of 31 December 2023	
	No.	%	No.	%	No.	%	No.	%
Under 30 years	0	0	0	0	0	0	0	0
30-50 years	2	38%	2	38%	4	67%	4	57%
Over 50 years	6	62%	6	62%	2	33%	3	43%
Total	8	100%	8	100%	6	100%	7	100%

## Diversity of the Supervisory Boards by citizenship

	Echo Investment S.A.				Archicom S.A.			
	as of 31 December 2022		as of 31 December 2023		as of 31 December 2022		as of 31 December 2023	
	No.	%	No.	%	No.	%	No.	%
American		12,5%	1	12,5%	0	0	0	0
Canadian	1	12,5%	1	12,5%	0	0	0	0
German	2	25%	2	25%	0	0	0	0
Polish	1	12,5%	1	12,5%	5	83,3%	4	57,1%
Swedish	0	0	0	0	1	16,7%	1	14,3%
Hungarian	3	37,5%	3	37,5%	0	0	2	28,6%
Total	8	100%	8	100%	6	100%	7	100%

There were no changes in the composition of Echo Investment S.A.'s Supervisory Board in 2023. Rafal Mazurczak resigned from the Supervisory Board of Archicom S.A., and shareholders appointed two members: Peter Kocsis and Bence Sass. The Group's ESG strategy, calls for women to constitute at least 40 percent of each Supervisory Board or at least 33 percent of a given company's Supervisory Board and Management Board combined by 2026. In 2023, the diversity indicator by gender in Archicom S.A.'s Supervisory Board worsened.



### Strategic goal

In line with the EU's directive on diversity in company bodies, Echo Investment and Archicom have committed that by mid-2026 women will hold a minimum of 40 percent of positions in the Supervisory Boards or a minimum of 33 percent in the Supervisory and Management Boards combined.





# Relevant remuneration

ESRS S1-10

## Remuneration of the Management Board

### Average remuneration of Echo Investment S.A. Management Board members by gender (in PLN)

	2022	2023
Female	1 568 419	1 494 762
Male	2 699 200	2 643 423
Gender not reported	0	0
Remuneration indicator M/F (x 100)	58,1%	56,5%

### Average remuneration of Echo Investment S.A. Supervisory Board members by gender (in PLN)

	2022	2023
Female	180 000	180 000
Male	106 286	106 286
Gender not reported	0	0
Remuneration indicator M/F (x 100)	169,4%	169,4%

The remuneration of each individual member of the Management Board is based on the level of responsibility. After excluding from the statistics the President and Vice-President for finance, whose responsibility for the Group as a whole is the highest in the Management Board, the indicator of female to male remuneration is 103 percent in 2022 and 102 percent in 2023.



# Training and skills development

ESRS S1-13

## In brief Material topic due to double materiality study

<b>Scope</b>	(S) social
<b>ESRS</b>	S1 Own workforce
<b>Material topic</b>	<b>Equal treatment and equal opportunities</b>
<b>Impact description</b>	<b>Training and skill development</b>
<b>Impact assessment</b>	<b>Positive</b> , existing
<b>Responsibility</b>	Director of the HR Department
<b>Scope</b>	Own employees with employment contracts, to some extent persons providing work for the Group under other contracts

## Echo Investment Group's material topic disclosures

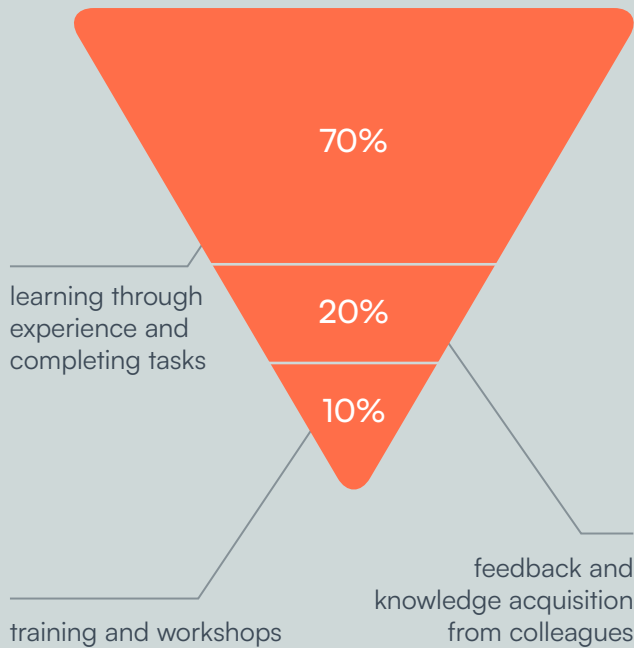
<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>Annual employee appraisal process</li> <li>Annual training plan</li> </ul> <p>No written policy. The employee development plan is developed annually to support the Group's business operations and annual goals.</p>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>Implementation of the 2023 training plan</li> <li>Adoption of the 2024 training plan with budget</li> <li>Development interviews at Echo Investment</li> <li>Implementation of development interviews at Archicom</li> <li>No significant financial outlay</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>Alignment of employee competencies with business needs in the context of the Group's business goals for the year</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	ESRS S1-13 - Indicators for training and skill development



## Group's training and education

We are dedicated to raising competencies of our employees, using various forms and development tools. We share our knowledge and skills through internal training and cooperation in interdisciplinary teams, and improve our qualifications by participating in conferences and external training. We plan training courses so that we can apply the knowledge and skills we gain in our daily work.

In developing employees' competencies and skills, we follow the 70/20/10 principle:



## Information on training in the Group in 2023

	2022	2023
Total number of training sessions conducted	121	86
Total number of training hours	9 801	6 158
Average number of training hours per 1 own employee	14,6	9,5
Average number of training hours per 1 female	13,1	10,2
Average number of training hours per 1 male	16,4	9,2

## Average number of training hours by category of hired employees

	2022	2023
<b>Top management (directors)</b>	<b>7</b>	<b>11</b>
Female	12	8
Male	6	12
<b>Mid-level executives (managers)</b>	<b>21</b>	<b>17</b>
Female	26	20
Male	18	14
<b>Other employees (specialists, experts)</b>	<b>13</b>	<b>8</b>
Female	11	8
Male	16	8

The annual training program is created on the basis of business needs defined by the Management of the Companies and Department Directors, as well as those reported by team managers annually and in terms of current ad hoc needs that arise due to changes in teams, needs to supplement competencies. Due to the organizational changes carried out in 2023, the Group's overriding goal was to harmoniously transfer the residential business along with its employees to Archicom, which became the Group's sole residential company. The entire process of transferring the residential business was strengthened by the development and training program conducted. The program supported the development of employees based on the Group's values, provided practical tools to effectively build the organizational culture, and effectively supported the management of the feedback process. The training was aimed at enhancing the ability of leaders and employees to create a positive work environment so that the new culture and organizational structure would foster synergy between teams and the efficient transfer of experience.



## New Archicom - mission, vision, values

In pursuit of the Group's strategy, in 2023, all residential operations, projects and employees responsible for them were transferred to Archicom.

This was a breakthrough year for Archicom, due to the leap in the scale of operations and the expansion of its portfolio. The changes required defining Archicom's mission, vision, values and goals. The execution of these actions was the axis of the Group's training program - particularly at Archicom.

### Mission

Building is about creating exceptional places to live. We take responsibility for designing, building and changing urban spaces. We wish to make cities conducive to living, residing and working.

### Vision

We would like to be a first-choice developer in the cities where we operate.

### Goals



Sales of 4,000 apartments per year



Gratification and satisfaction of clients

### Values



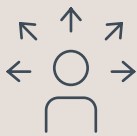
#### 1. Team

We play together, focused on our joint success



#### 2. Trust

We trust each other because we have good intentions



#### 3. Responsibility

I start with myself, because a lot depends on me



#### 4. Development

We strive to be better every day



## Key training sessions conducted in the Group in 2023

Topics	Scope	Number of participants
Manager's essentials	Managing diverse teams, feedback, empathy, goal setting. Training for persons in new managerial and leadership roles at Archicom	14
Sales division training	Workshops on how to make new sales quality, implement new standards in working with client advisors at Archicom. Three-month program.	12
Internal mentoring program	Development through exchange of employee experience at Archicom.	16
Leadership skills	Workshop for directors, part of work on Archicom's mission, vision and strategy.  Increasing the awareness of a leader's role, building leader effectiveness and realizing the impact on the organization and its team.  The evaluation tool was introduced to help evaluate representatives, define key people and roles, and plan development activities.	23
Personal development review (PDR)	Webinar for managers across the Group on conducting development interviews with employees. It focused on key aspects such as building a positive relationship, effective identification of development goals and the ability to provide constructive feedback.	80 (estimate)
Change - how to approach it and how to deal with emotions	Voluntary training and workshops for employees related to group layoffs carried out in 2022 at Echo Investment.	19

In addition, the Group's employees participated in a number of specialized training courses, including in tax, HR and others.

## Personal Development Reviews (PDR)

Managers in the Echo Investment Group conduct personal development reviews (PDRs) with their employees every year. Those who provide work for the Group under contracts other than employment contracts are also included in the process.

The PDR consists of two stages - an employee's self-assessment in a questionnaire designed for this purpose, and a direct development conversation with a supervisor. The purpose of the process is to summarize the past year's achievements and share with the supervisor a vision of one's professional future in the organization. This is a time to discuss achievements, reflect on competencies, strengths and potential, and define business goals and development goals for the next year.

In 2023, the personal development review program was also introduced and conducted for the first time at Archicom.

### Percentage of the Group's own employees who participated in personal development reviews

2022	2023
65%*	99%

\*The PDR program was introduced at Archicom in 2023.

## "School bell" educational platform

To strengthen employee competence and exchange knowledge within the organization using the knowledge and experience of our internal experts, in 2022 we inaugurated the "School bell" educational platform. The role of teachers is played by Group employees - specialists in various fields. In 2022, two one-hour lessons were held on the basics of financial reporting and the process of selling commercial real estate.

The program was continued in 2023 with the following topics:

- Why do we borrow money? (estimated number of participants - about 100 people from Echo Investment);
- What taxes do we pay in the Group? (estimated number of participants - about 100 people from Echo Investment);
- ESG - marketing gimmick or real change (estimated number of participants - about 120 people from across the Group).

The program will also continue in 2024.





# Goals for managing material negative impacts, enhancing positive impacts and managing material risks and opportunities

ESRS S1-5

## Group's goals related to employees in the value chain (employees at construction sites)

Goal	Time to achieve	Achievement level in 2023
Maintaining employment stability in the Group	Annual	The employee turnover indicator fell from 26.9 percent in 2022 to 17.82 percent. It should be taken into account that in 2022 a process of group layoffs was carried out in the Group.
Efficient implementation of organizational changes	2023	The change was made while ensuring business continuity without losing key employees.
Bridging the pay gap between men and women in similarly valued positions	2029	Establishing the starting point for total remuneration by employee value level.  Difference in average pay between women and men across the Group reduced from 70.5 percent in 2022 to 74.3 percent.
Leveling gender representation in senior director positions	2025	Determining the starting level for the Group: women - 57 percent, men - 43 percent.
Strengthening work-life balance by encouraging employees to take annual leave (maximum 10 days of accrued leave per employee)	2026	Determining the starting point - the number of outstanding leave days per employee was 13.
Compliance of the Group's operations with the Labor Code and other laws governing employee matters.	Annual	No confirmed cases of non-compliance.





# Employees in the chain value

ESRS S2

Taking care of the physical and mental health of our employees and subcontractors is an equally important element of our strategy, as creating stable job positions. We have invested in trainings and created a culture where everyone is involved in maintaining a safe working environment. Our goal is not only to meet standards, but to create a workplace where everyone feels stable.

As a company from the property development industry we prioritize technical safety of our employees and contractors. We do not cease following the formalities. We care about good relationships, we support integration, invest in health, and promote physical and social activities within the Group. Through these actions, we not only take care of the individual needs of employees, but also create a coherent corporate culture.

All of our actions are integral elements of the company's mission, and their outcome can be observed as a safe and inspiring working environment. We believe that only in a healthy physical and mental environment, our employees can achieve their full professional as well as personal potential.



# Interests and opinions of stakeholders

ESRS2 SBM-2

The Group does not have a structured strategic dialogue with employees at construction sites, but works closely with them and their representatives on matters of construction site safety and working conditions.

## Current cooperation

The Group's employees are always present on all construction sites to supervise and coordinate the work. There are construction directors, engineers as well as health and safety coordinators among them. The construction sites are regularly visited to ensure compliance with health and safety regulations as well as environment protection regulations. We conduct weekly visits called "Peer Reviews" focusing on health and safety issues. They are attended by representatives from the Group's construction supervision, individuals responsible for order and safety, construction managers of all subcontractors and individuals responsible for health and safety regulations in subcontracting companies. During the meetings, current issues regarding the construction site's operation are discussed. These are current risks, preparation of the construction site, machines and their certificates, applied safety measures, personal protective equipment, order and compliance with guidelines. After that, guidelines and recommendations for construction sites are prepared. The construction sites are also inspected by Echo Investment's EHS Team, representatives of the Management Board and top management (Executive Site Safety Visits, or ESSVs), as well as by state services - including the State Labor Inspectorate and construction supervision.

Each construction site also holds regular weekly coordination meetings with contractor supervision (a memo is taken), and communication with employees is facilitated by an information board (which includes basic OSH information and organizational announcements) and a board with reports of current needs ("you report - we do").

The Group's Management Board is regularly informed about safety issues at construction sites by regular reports on accidents, their consequences and recommended actions to avoid them in the future. The Management Board participates in ESSVs (inspections related to safety and environment protection at construction sites) which is one of the annual performance goals tied to compensation. The Supervisory Board is only informed about these actions in exceptional cases, as it is not within the scope of their responsibilities.



# Material impacts

## ESRS2 SBM-3

The Group's actual and potential impacts on persons performing work in the value chain, as determined by the double materiality study, occur and primarily affect employees of subcontractors who perform construction work at construction sites managed by the Group. The Group takes this fact into account in its strategy and business model, making every effort to ensure maximum safety for employees in the value chain.

The Group does not carry out construction work itself, but buys such services from contractors (construction companies). In formal terms, it thus shifts the burden of protecting workers to their employers. In practice, the Group requires and enforces its subcontractors to provide maximum safety for workers at construction sites, and to a large extent engages itself in providing adequate training, protective measures and proper procedures.

### Group's tools for ensuring safe work for employees at construction sites

- Own OSH team to oversee implementation of Group policies and requirements, develop the training plan, participate in regular reviews;
- Qualification form for the contracting process;
- OSH requirements of the Group;
- Own team to oversee OSH matters on most construction sites;
- Regular OHS reviews at construction sites performed by the Management and senior managers, the OHS team and employees from other construction sites (Peer Review);
- Implementing the training plan for employees at construction sites (scheduled and ad hoc);
- The motivation and discipline system on each construction site.

The scope of ESRS2 SBM-3 disclosures includes persons performing work at the Group's locations (at construction sites). The Group does not analyze the impact on employees of upstream entities in the value chain (e.g., employees of companies that produce building materials, components, concrete and equipment purchased to equip buildings), downstream entities (e.g., maintenance service providers), or employees working in joint ventures (those working in the finished Resi4Rent and Galeria Młociny buildings).

The Group does not identify employees in the value chain who are particularly vulnerable to negative impacts due to their innate characteristics or their particular situation. The Group has not identified the risk of child labor, forced or compulsory labor of those performing work in the entity's value chain, given its long-standing business relationships with many contractors, their location of doing business, information collected during purchasing processes and its own experience and knowledge.

As part of the double materiality analysis, the Group identified its OSH system as a material, positive and actual impact on workers at construction sites. This is due to the developed and advanced OSH culture that has been developed at the Group since 2018. The identified material risk to employees on the Group's construction sites is the risk of accidents, which is common and systemic for the entire construction sector.

The Group has provided more information on material impacts, risks and opportunities related to its strategy and business model in Chapter 1 of this report in ESRS2 SBM-3 and ESRS2 IRO-1 indicators.



# Policies related to value-chain workforce

ESRS S2-1

## In brief Material topic due to double materiality study

Scope	(S) social
ESRS	S2 Employees in the value chain
Material topic	<b>Working conditions: occupational health and safety</b>
Impact description	<b>Efficiently functioning health and safety system</b>
Impact assessment	<b>Positive</b> , existing
Responsibility	Echo Investment CEO, Archicom CEO
Scope	Employees of subcontracting companies working at construction sites managed by the Group, own employees working at construction sites

## Echo Investment Group's material topic disclosures

<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>• Health, Safety and Environmental Policy</li> <li>• Group's 2030 sustainable strategy</li> <li>• Environmental and Health and Safety Management System Book</li> <li>• ISO 14001 and ISO 45001 standards (for Echo Investment)</li> <li>• Annual training programs</li> </ul>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>• Implementation of the 2023 training plan</li> <li>• Preparation to implement ISO 14001 and ISO 45001 standards at Archicom</li> <li>• No significant financial outlay</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>• Zero fatalities at construction sites</li> <li>• Annual operational goals from the Environmental and Health and Safety Management System Book for 2023</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	<ul style="list-style-type: none"> <li>• Accident indicator at construction sites</li> <li>• Number of accidents, including fatalities</li> </ul>





We do not tolerate any compromise when it comes to the safety of employees. We also feel responsible for all workers on our construction sites, even though most of them are employed by our subcontractors.

Managing the safety on the Group's construction sites is the responsibility of the Safety, Occupational Health and Environmental Protection (EHS) Teams, which function at Echo Investment and Archicom and work closely together, through the exchange of experience and standards. The head of the team on the Archicom side - Łukasz Bartnicki - was awarded the prestigious NEBOSH certificate in 2021, which confirms his competence in implementing safety work standards at the highest international level. The work of these teams is directly supervised by the CEOs of both companies, which shows the priority in managing this matter in the Group. The Group estimates the amount of costs related to health and safety at construction sites (personnel costs, security costs, personal protective equipment, training, etc.) amounted to approx. PLN 3.5 million in 2023.

Construction sites managed by Echo Investment have the highest safety standards, confirmed by international certificates.

**ISO 14001**

**ISO 45001**

ISO 14001 and ISO 45001 certifications are audited annually by Dekra, an external auditing firm. The 2023 audit confirmed full compliance of our EHS management system with the standards. The Management Board, directors and employees at construction sites, have tasks included in their annual goals in the field of OSH.

All employees of the Group and subcontractors who perform any work on Archicom and Echo Investment construction sites are subject to an externally audited safety system.

## Human rights at subcontractors

The Group's major subcontractors are required to comply with the Code of Conduct, which is described in Chapter 4 of this report in ESRS G1-1 indicator and in ESRS2 S1-1 indicator of Chapter 3. The Group does not have a separate code of conduct for subcontractors.

The Code of Conduct is a mandatory appendix to major construction contracts. At Archicom, this means contracts with a value of more than PLN 500,000; at Echo Investment, it means contracts prepared by the contracting and valuation department (these are all contracts except for smaller, ongoing purchases directly by employees at construction sites).

In the double materiality analysis or day-to-day practice, the Group has not recorded any instances within its upstream or downstream value chain of non-compliance with the UN Guiding Principles on Business and Human Rights, the International Labor Organization's Declaration on Fundamental Principles of and Rights at Work or the OECD Guidelines for Multinational Enterprises.

The Group has not implemented a systematic mechanism for verifying statements by contractors and subcontractors on compliance with the Code of Conduct. If a case of breach of human rights is uncovered, the Group has the right to demand that the situation be corrected and to use common tools to rectify the situation by reporting to the State Labor Inspectorate, Construction Supervision Inspectorate, to law enforcement agencies, etc. The Group may also exclude such an entity from future tenders. We have not recorded any such cases in 2023.

# Collaboration with value chain workforce in terms of impacts

ESRS S2-1

## In brief

### Material topic due to double materiality study

<b>Scope</b>	(S) social
<b>ESRS</b>	S2 Employees in the value chain
<b>Material topic</b>	<b>Working conditions: occupational health and safety</b>
<b>Impact description</b>	<b>Risks to health and life of workers at construction sites</b>
<b>Impact assessment</b>	<b>Negative</b> , potential
<b>Responsibility</b>	Construction site directors and heads of Echo Investment's and Archicom's health and safety departments
<b>Scope</b>	Employees of subcontracting companies working at construction sites managed by the Group, own employees working at construction sites

## Echo Investment Group's material topic disclosures

<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>• Health, Safety and Environmental Policy</li> <li>• Group's 2030 sustainable strategy</li> <li>• Environmental and Health and Safety Management System Book</li> <li>• ISO 14001 and ISO 45001 standards (for Echo Investment)</li> <li>• Annual training programs</li> </ul> <p>The policy aims to minimize the risk of occupational accidents and avoid fatalities.</p>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>• Implementation of the 2023 training plan</li> <li>• Adoption of the 2024 training plan with budget</li> <li>• Preparation to implement ISO 14001 and ISO 45001 standards at Archicom</li> <li>• No significant financial outlay</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>• Zero fatalities at construction sites</li> <li>• Annual operational goals from the 2023 Environmental and Health and Safety Management System Book</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	<ul style="list-style-type: none"> <li>• Accident indicator at construction sites</li> <li>• Number of accidents, including fatalities</li> </ul>

The policy regarding the risk to health and life of workers at construction sites is the same as the policy described in ESRS S2-1 indicator above. Its goal is to minimize occupational accidents, avoid related costs (lost man-hours, downtime, compensation, emotional costs for workers and their families) and prevent fatalities.

To ensure the safety of workers at construction sites, the Group - through its representatives - works closely with subcontractors. This includes cooperation in setting rules and requirements, maintaining standards, checking authorizations, etc., as well as day-to-day ongoing cooperation at construction sites (issues of implementation of standards, deficiencies, the need for protective equipment or safe execution of work).

Construction site directors and heads of Echo Investment's and Archicom's health and safety departments are responsible for cooperation with contractors' employees.

We require that there is at least 1 supervisor for every 10 construction workers. Every person working on our construction sites - including subcontractor employees - is obliged to report every accident incident, injury incident, and near miss. The information is forwarded to our Group's health and safety departments and then used for prevention and education purposes on all other construction sites. We also require that if foreigners who do not speak Polish are hired, an interpreter (usually a supervisor) is always present at construction sites.

## We understand each other

Construction workers at construction sites are often people from other countries, including Ukraine, Belarus and Kazakhstan. Our contractors and subcontractors value their reliability and work culture, so together with them we make every effort to ensure that these specialists are treated fairly on our construction sites, regardless of their level of knowledge of the Polish language or the realities of the labor market in Poland. In our contracts with contractors, we secure the opportunity to review certain documents relating to the employment of foreigners - these are mainly work permits, licenses held and professional training received. Supervisors of our construction sites also pay attention to signals of unequal treatment of workers - primarily in the area of health and safety.

We require that on our construction sites foreign workers have permanent translators or direct supervision providing information in the language spoken by the workers, and that the main documents on site work rules, including safety rules, etc., are also translated into Ukrainian.

### Accidents at construction sites of the Group

	2022	2023
Average monthly number of workers at construction sites	1 920	1 035
Number of man-hours worked	5 768 809	4 578 915
Fatal accidents due to work-related injuries	0	1
Work-related injuries (excluding fatalities, requiring medical leave)	11	9
Minor work-related injury (first aid required)	0	0
Total work-related accidents	11	10
Accident indicator (number of accidents per 1 million man-hours worked - LTAFR)	1.90	2.17

The Group does not collect information on the identity of employees, only on their numbers. All employees staying on the Group's construction sites fall under the system.

# Processes for leveling negative impacts and channels for submitting problems by value chain employees

ESRS S2-3

## Process of investigating work-related accidents

In 2023, we ran more than 40 construction sites in the Group at the same time. We take care to ensure the flow of knowledge and good practices between them. When an incident or accident occurs on any construction site, following an investigation into causes of the incident, a report is prepared with conclusions and recommendations for all construction sites. The task of managers of each construction site is then to check the issue, implement the conclusions and inform the EOSH Team of the actions taken.

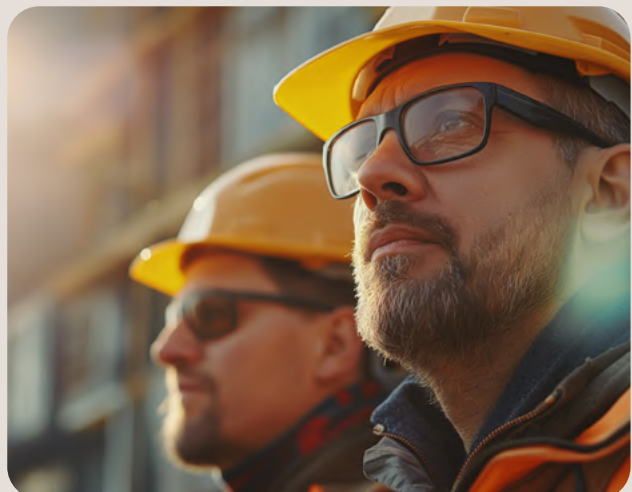
Accidents and injury incidents are always described and communicated to all concerned, as well as to our all other construction sites. Each time such a report triggers an obligation to analyze the possibility of a similar incident on any other construction site and to take measures to reduce such risks. After receiving such information, on each construction site employees have seven days to report to the EHS Team what measures have been taken in the area. The analysis of past accidents and incidents is the basis for determining the topics of the training program for the coming year, and sometimes the organization of ad hoc training.

## Reporting irregularities

The Group's construction safety policy is set forth, among other things, in the Environmental and Health and Safety Management System Book, which is an appendix to major contracts with subcontractors. Its Chapter 12 regulates the handling of safety and environmental non-compliance (relating to deviations from the Environmental and Health and Safety Management System and the Group's Health and Safety Requirements). In accordance with it, the Group investigates causes and possible legal consequences of reported nonconformities. Each nonconformity is analyzed by the Group's local EHS representative, who then decides on corrective and preventive actions, and delegates tasks related to the implementation of such actions. The effects and effectiveness of corrective and preventive actions are monitored. If necessary, the Group implements changes to procedures resulting from the corrective and preventive actions, and then communicates them to all employees. Each such report is described in the report.



Our accident prevention and monitoring system at construction sites is based on collecting as many observations as possible from workers and responding appropriately to reported information.





The Group actively encourages the reporting of irregularities during inspections and surveys of construction sites, at briefings, meetings, through a "you report - we fix" board, numerous informational materials, as well as through a reward system for construction workers for their proactive attitude related to, among other things, to safety and environmental protection. In 2023, construction sites managed by the Group distributed 180 such awards.

Another preventive and incentive measure is a system of yellow and red cards for those who fail to comply with health and safety rules at construction sites. Receiving a red card for a serious breach or ignoring previous comments, results in the removal of the employee from the construction site. Any worker has the right to refuse to perform tasks that he or she believes may result in an accident, injury or impair health. In 2023, construction supervision handed out 1010 yellow cards (2 percent more than a year ago), and the number of red cards was 215 (increased by 40 percent).



## Strategic goal

Responding to numerous requests from workers at construction sites, in 2023 we introduced to the standard of contracts with contractors the obligation to provide adequate construction site facilities and guidelines governing requirements. On all new construction sites, welfare facilities must be functional for workers, provide quality bathrooms and toilets, a comfortable place to rest and eat. These requirements are much higher than the law stipulates, as we are also concerned with ensuring good working conditions.

The Group does not provide employees of subcontractors with a special whistleblowing channel. This is done directly by talking to the Group's supervision at construction sites. Typically, the Group also does not get involved in individual reports of human rights breaches, labor rights and ethics problems, as these are issues of employee relations with their employers. However, the Group can provide support in such situations if they involve work on its construction sites. Although the Group's internal policies on whistleblower protection do not directly apply to employees of subcontractors, Group employees strive to provide whistleblowers with anonymity and protection from retaliation if it is within their range of influence.

The Group has not analyzed the effectiveness of whistleblower channels, assuming that any matter reported should be dealt with as quickly as possible, due to safety concerns.



# Taking action on material impacts on value chain workforce

ESRS S2-4

According to the double materiality study, the Group identifies that its material impact on employees in the value chain is ensuring health and safety at construction sites. The Group accomplishes this through the following preventive measures:

- Supervision of the Group's representatives over working conditions in terms of OSH - through its own health and safety services;
- Cooperation with contractors who meet the criteria related to health and safety;
- Coordination with contractors on site work;
- Encouraging construction workers to share concerns, observations and ideas for improvements;
- Training and education of employees.

All employees of the Group have received initial OSH training and periodic training to update this knowledge. In addition, construction supervision employees, both on the investor's side and on the contractor's side, are covered by training courses to meet ongoing safety needs.



## Key training sessions conducted for construction workers

Scope	Number of participants
Training for investor's construction site supervisors (Site Management Safety Training Scheme, SMSTS)	8
Training for contractor's construction site supervisors (Supervisor Orientation Training online, SOT)	93
Specialized training - working at heights	235
Specialized training - vertical transport	119
Specialized training - hot work	58
Specialized training - office fire evacuation	166
Training on the PERI formwork system	17
Training on Hilti Neuron technology	33

The Group evaluates the effectiveness of its actions to ensure the safety of workers at construction sites based on the accident indicator (ESRS S2-1 above) and the number of reported irregularities and observations. The Group determines what types of actions are needed and appropriate in response to specific actual or potential material adverse impacts on workers at construction sites through the expertise of experienced employees from the OHS team, cooperation with contractor supervision, and based on the type of accident or near-accident events observed. Processes for managing material risks associated with individuals performing work in the value chain are part of the Group's risk management processes.



## Best practice

Echo Investment and Archicom have participated for the first time in the Safety Week, an annual series of events organized by the Arrangement for Safety in Construction. The initiative involved 15 construction sites of the Group from Łódź, Warsaw, Kraków, Poznań and Wrocław. Fifty-four trainings, workshops, demonstrations and meetings were held, primarily related to health and safety, but also to ethics, green business and environment protection. In addition, 6 ESSVs of the Management Board were conducted. In addition, the Group participates in the "Developers' Alliance" initiative, which aims to promote the safety culture, raise the awareness of dangers at construction sites and minimize risks.

Our construction sites are regularly recognized by the State Labor Inspectorate. In 2023, the District Labor Inspectorates honored two construction sites operated by Echo Investment in the "Build Safely" competition. They are the Fuzja office building in Łódź in (3rd place) and Resi4Rent Wrocław Park Zachodni (honorable mention).

## We all care about the safety

The Group's construction sites are regularly inspected by various stakeholders, giving us insight into their opinion of measures we take on health and safety matters. Last year, the following inspections took place on the Group's 44 active construction sites:

- 614 Peer Review visits, which focus on health and safety matters. These visits are attended by the Group's construction supervisors, persons responsible for order and safety, construction managers on the side of all subcontractors, and persons responsible for health and safety at subcontractor companies. This is twice as many visits than in 2022;
- 154 ESSVs (Executive Site Safety Visits) - conducted by representatives of the Management Board and top management;
- 1110 OSH team visits;
- 402 introductory meetings with contractors to discuss safety matters and health and safety requirements, among others;
- 6 inspections by the State Labor Inspectorate, which found no significant deficiencies.





# Goals for managing material negative impacts, enhancing positive impacts and managing material risks and opportunities

ESRS S2-5

## Goals of the Group related to employees in the value chain (employees at construction sites)

Goal	Time to achieve	Achievement rate in 2023
Zero fatal accidents (ESG Strategy goal)	Annual, permanent	In 2023, the Group's construction sites had 1 fatal accident.
Minimal number of severe accidents and lost work days	Annual, permanent	The number of accidents that involved lost work days was 9 compared to 11 in 2022. The indicator of accidents per man-hours worked increased from 1.9 to 2.17 (fewer man-hours).
Introduction of standardized welfare facilities on all Group construction sites (ESG Strategy goal)	until 2026	In 2023, the standard was introduced into new contracts with subcontractors. Implementation of the standard in 100 percent of Echo Investment's new construction sites.
Introduction of the system to measure employee satisfaction at construction sites (ESG Strategy goal)	2023	The goal was not met due to changes in the Group.
Operational goal at construction sites: introduce the use of steel working platforms (consoles) for column and wall formworks	2023	The goal accomplished.





## Additional operational goals of the Group for 2023 (selected)

The following goals are derived from the Environmental and Health and Safety Management System Book for Echo Investment. For Archicom, they are modeled on the Book because this company does not yet have ISO 14001 and ISO 45001 implemented, and therefore does not have the Book in place either.

Goal	Scope of application	Implementation
EHS training for all new Group employees working at construction sites	Archicom and Echo Investment	52 new employees, 100 percent trained
Resolution of reported non-compliances found during internal health and safety audits related to the ISO standard	Echo Investment	5 non-compliances identified, 80 percent resolved
Implementation of safety standards for working at heights on new construction sites (edge protection)	Echo Investment	100 percent of completion throughout the year, including 2 construction sites out of 19 (11 percent) behind schedule
Maintenance of a high level of order at construction sites (storage of materials, storage of tools, completeness of fencing)	Archicom and Echo Investment	24 out of 25 construction sites (96 percent) met the goal for the end of 2023
Implementation of full EHS reporting by construction sites	Archicom	100 percent of construction sites implemented reporting



# Affected communities

ESRS S3

We have been building apartments, offices, hotels and shopping and entertainment centers for more than 20 years. What was born out of our experience is the concept of large, mixed-use urban spaces that are open and closely integrated with their surroundings. "Destinations" attract and inspire people to action, invite them both to spend time in them and to call them their home.

"Destinations" are our response to exurbanization, the process of urban sprawl. We want these projects to be built in areas that have already been urbanized and have infrastructure. Our ambition is not to use suburban, green, forest or agricultural areas for projects.

The biggest beneficiaries of "destinations" projects will be nature and our living comfort. Countering urban sprawl has an impact on noise levels, time spent commuting and air quality or public services, among other things. Therefore, we aim to implement projects only within city limits, and by 2030 half of our projects will be such developments.





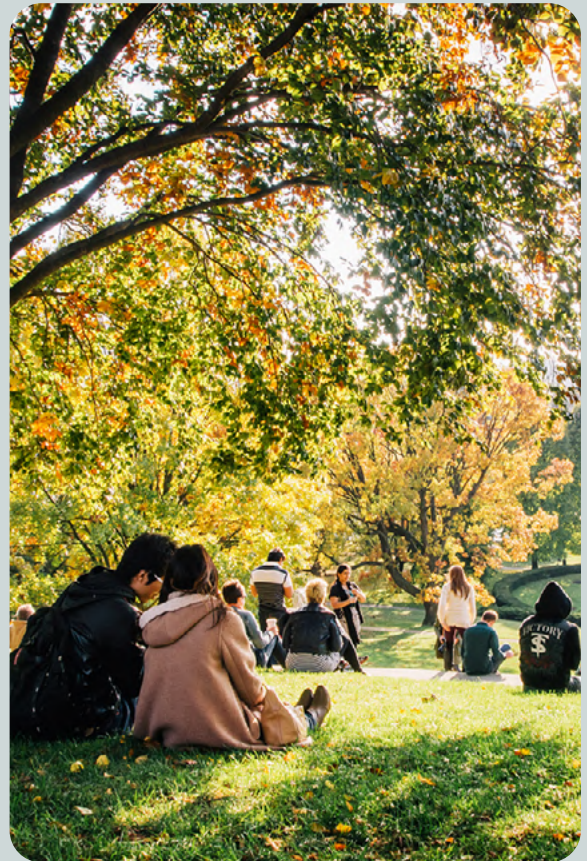
# Material impacts, risks and opportunities and their interrelationship with strategy and with business model

## ESRS2 SBM-2

The double materiality study shows that communities affected by the Group's operations include residents and users of the cities where the Group's projects are developed, particularly their immediate neighborhoods:

- Users of projects built by the Group;
- Clients - in particular individual clients buying apartments from Archicom

The Group does not consult its strategy and business model with affected communities, although at the level of implementation of individual projects it seeks to cooperate with local communities. This is particularly true for planned property development projects, urban infrastructure and social activities. The Management Board recognizes that the relationship of the Group's strategy and business model is linked to the affected communities in an irreversible way, i.e. property development activities by their very nature affect the environment. Its long-term effects on communities are for the most part positive (infrastructure development, taxes, opportunities), while its negative effects (possible inconveniences during the construction process) are mitigated through ongoing project management.



## Impact of the Group on major stakeholders

Stakeholder	Impact
Local communities, neighbors of projects	<p><b>Positive:</b></p> <ul style="list-style-type: none"> <li>• expansion and modernization of urban infrastructure (roads, sidewalks, squares, greenery, urban space, other investments such as a school);</li> <li>• taxes paid directly and induced by attracting new residents or businesses to a given location;</li> <li>• commercial offer development (stores, service outlets, restaurants, cafes);</li> <li>• cooperation with local communities through events and support for selected initiatives;</li> <li>• high quality architecture.</li> </ul> <p><b>Negative:</b></p> <ul style="list-style-type: none"> <li>• noise, dust and other inconveniences associated with construction itself;</li> <li>• use of land that was often previously easily accessible;</li> <li>• increased traffic once a project is built.</li> </ul>

## Policies related to affected communities

ESRS S3-1

The Group does not have an independent policy related to affected communities.

Activities related to affected communities are defined in the Group by general regulations such as the Code of Conduct ("We respect the United Nations Universal Declaration of Human Rights and are committed to upholding its principles - in particular towards ... local communities in which we operate"), the Safety and Environmental Policy or the Data Security Policy.

The identified impact of the Group's operations on material affected communities does not relate to human and universal rights matters, labor rights, indigenous peoples' matters (the Group operates in Poland, where there are no indigenous peoples). However, in the case of human rights or other universal rights breaches against an affected community, the Group has no procedure or schemes of its own to redress wrongs, and will rely on laws and decisions of state institutions.

The Group declares that its policies on affected communities are in accordance with international standards for communities and indigenous peoples in particular, including the UN Guiding Principles on Business and Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. The Group's own upstream and downstream operations or value chain have not recorded any cases of non-compliance with these rights.

## Cooperation processes regarding interactions with affected communities

ESRS S3-2

The implementation of major development projects affects neighborhoods' daily operations. Therefore, where appropriate, we engage in dialogue with neighbors of our plots by providing them with information about our intentions. We also naturally cooperate with city institutions and other stakeholders. This is an important part of the investment process, which improves the quality of the environment and allows us to implement projects that are in line with residents' expectations. Our dialogue with local communities is not structured, it is not a fixed part of the investment process, but an action of the company in response to public expectation. In certain situations, it is also a response to administrative requirements (e.g., for projects built under the so-called housing special act).

In the case of special, significant and interest-generating projects, we also involve local communities in discussions. This happened in the case of, among others, the Modern Mokotów project at Wołoska Street in Warsaw (the dialogue determined the size of a school the Group builds for the city) or Przasnyska in Żoliborz (the dialogue resulted in the withdrawal of the project). In such cases, the dialogue is initiated at the design stage. The architectural team, usually consisting of representatives of the Group and an external architectural studio, is responsible for it. The team's actions are coordinated by the Group's proxy with overall responsibility for administrative and permitting processes. The effectiveness of the dialogue is assessed by reaching an agreement on the shape of a future project or its approval.

In 2023, the Group completed the dialogue on the project at Przasnyska Street in Warsaw, and did not undertake any other efforts to conduct a meaningful dialogue process for other projects.



## Management of complaints and comments

Our projects are most often built in urbanized neighborhoods and therefore affect neighbors, the functioning of transportation and aesthetics. We pay attention to ensuring that construction sites do not inconvenience neighborhoods, although this is not always possible. To better monitor reported inconveniences, as well as to best manage them, in 2022 we implemented a notification reporting system. This allows us to react quickly, and later to analyze problems and improve work organization.

## Number of registered complaints and grievances at construction sites

2022	2023
54	8

Our group's activities have a positive impact on the shape of cities, which is also appreciated by local communities. Particularly well-received are mixed-use "destinations" projects that complement large areas of cities and have great potential for social contribution - meaningful investments in publicly accessible infrastructure, greenery, services, road layout, etc., so that their positive impact on neighborhoods is significant.

### In brief Material topic due to double materiality study

Scope	(S) social
ESRS	S3 Affected communities
Material topic	<b>Economic, social and cultural rights of communities</b>
Impact description	<b>City formation</b>
Impact assessment	<b>Positive</b> , existing
Responsibility	Board members responsible for commercial projects and real estate purchases
Scope	Communities around finished, ongoing and planned projects

### Echo Investment Group's material topic disclosures

<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>Echo Investment's strategy</li> <li>Sustainable strategy</li> </ul> <p>The policy and strategy set out in relation to the urban development area is designed to demonstrate the positive impact of the Group's activities on urban development and to distinguish the Group's actions in the industry.</p>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>Purchase of land plots for new projects</li> <li>Preparation of new projects</li> <li>No significant financial outlays</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>50 percent of the project portfolio eligible for "destinations" projects</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	<ul style="list-style-type: none"> <li>Indicator of the share of mixed-use, urban projects ("destinations") in the Group's total portfolio of projects under construction and in the pipeline</li> </ul>



# Destinations — mixed-use city

"Destinations" are places that attract, where people live comfortably, work well and spend their leisure time pleasantly. Creating them is one of the basic elements of the Group's business strategy. Projects such as Browary Warszawskie, Fuzja i Flow in Łódź, Towarowa 22 in Warsaw, Wita Stwosza in Kraków and Planty Racławickie in Wrocław are wisely and responsibly designed parts of cities. The most important thing is what is between the buildings. We aim for people to use city spaces not only at certain times, but all the time. This is fostered by well-designed, green public spaces and the features that most encourage people to interact - dining, entertainment and retail. Our city-creating projects open up unavailable, degraded areas of cities and complement neighborhoods with missing functions. They are created in line with the latest global trends in urban planning, such as ecology, sharing economy, promotion of public transportation, pedestrian and bicycle connections. Their integral element is also greenery.

## Share of mixed-use, urban projects ("destinations") in the Group's total portfolio under construction and in preparation

	2022	2023
Portfolio size [sqm of floor space].	1 368 300	1 436 500
"Destinations" projects [sqm of usable area]	750 900	576 100
Indicator	55%	40%

The Group includes the following projects to its "destinations" projects: Wita Stwosza and Kapelanka in Kraków; Fuzja, Zenit and Flow in Łódź; Wieża Jeżyce in Poznań; Modern Mokołów, Towarowa 22 and Rytm in Warsaw; Planty Racławickie, Olimpia Park and Browary Wrocławskie in Wrocław.

The idea of "destinations" develops the multifunctional 15-minute city concept, which provides residents with access to essential services within walking or biking distance. This helps in animating urban life and reduces people's need to travel extensively to distant districts on a daily basis, e.g. to work, school or for shopping.



# Destinations in practice

40%

such a share of the area of our projects under construction and in the pipeline is accounted for by mixed-use "destinations" projects

5 cities

Łódź, Poznań, Warsaw, Wrocław, Kraków

12

projects

## City formation

Projects based on good transport connections, common spaces and people-to-people contacts. They interact with the area outside the boundaries of the project itself. Such projects consist of at least several buildings (preferably with different functions), connect with the city, co-create its infrastructure, greenery and develop public spaces.

## Good neighborhood

The place is open to the environment, it is not fenced. It allows people to use its potential. It is - next to the buildings - full urban infrastructure, bicycle paths, pedestrian routes.

## "Destinations" projects:

Kraków: Wita Stwosza and Kapelanka  
Łódź: Fuzja, Zenit and Flow  
Poznań: Wieża Jeżyce  
Warsaw: Modern Mokotów, Towarowa 22 and Rytm  
Wrocław: Planty Raclawickie, Olimpia Park, Browary Wrocławskie

## Good place to live and work

It provides the convenience of living and saves time. It assumes access on foot to work, stores, education and other major services, in a maximum of 15 minutes. Putting it into practice means comfort and favors the environment - thus reducing the need to use cars to get around.

## Revitalization of degraded areas





# Key "destinations" projects

## Wita

start of construction:	2024
location:	Kraków
architectural firm:	Pracownia MOFO Architekci
usable area of buildings:	39 000 sqm



In 2023, the Group brought to completion preparations for the launch of a new project called Wita in Kraków. On 3 hectares at Wita Stwosza Street in Kraków's Old Town district, Echo Investment and Archicom will develop a mixed-use project. Five four-story residential, office and service buildings will be constructed on the site of the former supply warehouses of the Kraków Fortress. The concept also calls for accessible recreational areas amid lush greenery.

The project, agreed with a heritage conservator, was prepared by MOFO Architekci. The buildings will relate to the tradition and historical buildings in the area. The architecture is characterized by sparing decorations and the form subjected to the function. The spacious interiors of the common areas will be highlighted by stylish details such as wood and decorative tiles.

The project will be built in stages, with its completion scheduled for 2026.

## Flow

start of construction:	2024
location:	Łódź
architectural firm:	Pracownia PIG Architekci
usable area of buildings:	59 400 sqm



The project is in the New Center of Łódź, which was prepared by Archicom in 2023. It will occupy 2 hectares between the Łódź Fabryczna Railway Station and the EC1 scientific and cultural complex, and will offer more than 1,200 apartments in five stylish buildings. The Flow area will be open to the city, landscaped with greenery and closed to car traffic.

The project is scheduled to be completed by the end of 2028.



# Towarowa 22

start of construction:	2023
location:	Warsaw
architectural firm:	JEMS Architekci
usable area of buildings:	200 000 sqm



Towarowa 22 is a modern, friendly and comfortable quarter in the center of Warsaw. It brings new urban and functional value to a 6.5-hectare area formerly occupied by a printing plant. Offices, apartments for sale and rent, restaurants, service points, as well as public spaces and all-around greenery will be created here, between which a network of urban streets and pedestrian and bicycle routes has been laid out. The centerpiece of the project will be a park with the modernist pavilion of the Polish Word House.

The project is being developed by three experienced companies with complementary competencies. Echo Investment is the developer responsible for carrying out the commercial part - offices and apartments for rent. AFI Europe is the majority owner of the commercial part and is responsible for commercialization and management of apartments for rent under the AFI Home name. Archicom is the developer constructing apartments for sale. The entire project will be completed by 2028.

Towarowa 22 is being developed in line with a project of the Local Spatial Development Plan, more than fulfilling its assumptions and requirements. Completing this plot with compact and thoughtful development co-creates a city without heat islands, while respecting the local cultural heritage.

## 2023 in Towarowa 22

At the intersection of Pańska and Wronia Streets, the construction of the Office House building offering 31,000 sqm of offices has begun. Its first floor has been allocated for retail, services and restaurants, as well as for conservatories with elements of small architecture and resting areas. The remaining floors will feature flexible work spaces with green loggias. The original character of the building will be highlighted by a connected pavilion with an openwork structure.

Office House responds to the needs of employees, who are helped by the office to achieve full efficiency in a hybrid model or after a full-time return to stationary work. The technologies used place Office House among the most advanced buildings in Poland in terms of pro-environmental solutions, including carbon footprint reduction. Office House will

be powered by renewable energy, including some generated on-site, such as photovoltaic panels. It will have a three-layer glass facade, which will maintain an optimal indoor temperature at all times of the year, reducing energy consumption for cooling or heating. Lower electricity consumption will also be possible thanks to LED lighting controlled by the DALI system. In turn, air quality in the building will be taken care of by a special purification technology modeled on processes naturally occurring in nature.

Office House is being built in line with requirements for the BREEAM environmental certification at the highest level of "Outstanding". It will also meet WELL certification guidelines, as well as WiredScore and SmartScore certification.

## 6,5 ha

of investment land in the heart of Wola, a dynamically developing district of Warsaw

## 150 m

as much will be the highest point of the project - an office building at the intersection of Towarowa and Pańska Streets

### Certifications:

**BREEAM**  
at the highest "Outstanding" level

**WELL**

**WiredScore**

**SmartScore**

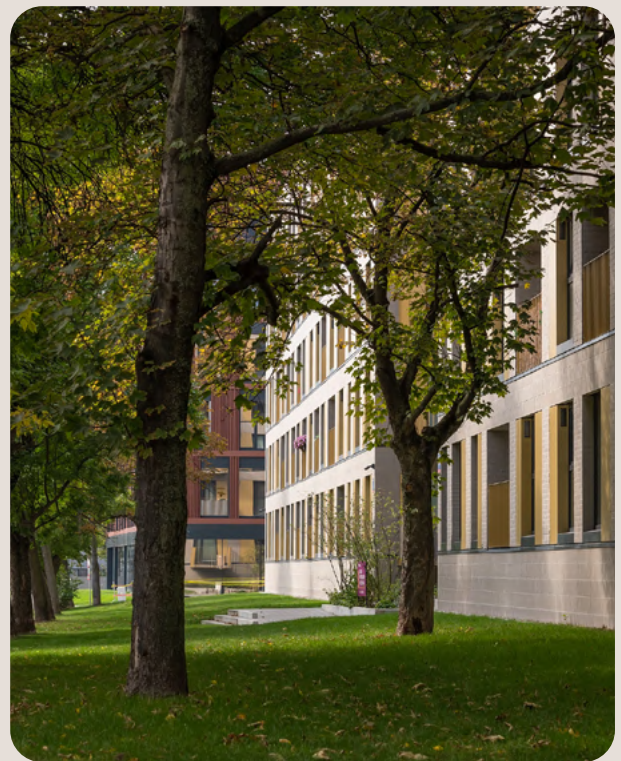
# Fuzja

start of construction:	2019
location:	Łódź
architectural firm:	Medusa Group
usable area of buildings:	35 800 sqm



The space of Fuzja is a place for meeting all daily needs: living, working, running errands, recreation. It is becoming a beating heart of Łódź. It is being built on more than 7 hectares of land imbued with rich history and gives a second life to beautiful, buildings of Karol Scheibler's former textile factory. Its undoubted

attraction is the impressive Art Nouveau power plant designed by engineer Alfred Frisch. The revitalization of Fuzja, due to the huge project area and demanding work on the historic fabric, is being carried out in stages.



## 2023 in Fuzja

At the beginning of 2023, construction work began in the northern part of the complex on the side of Tymienieckiego Street. Two historic buildings are being revitalized here, which will gain a residential function. One will be completely restored, and 171 classic lofts will be created inside. In the other, outer historic walls will be revitalized, surrounded by a new building offering 160 loft apartments.

In Fuzja, the city's first location of CitySpace flexible

office space was opened. The newly constructed, three-level building has a total of 2,000 sqm of this type of business space.

The year 2023 was also marked by attractive events for the local community. Fuzja hosted, among other things, the second edition of an artistic festival featuring local handicrafts, as well as a Christmas fair with free creative workshops, joint caroling and fantastic light illumination.

# Remediation processes for negative impacts and channels for affected communities to report problems

ESRS S3-3

The Group's impact on neighbors and local communities, as described earlier, is due to the very nature of the property development business and the specifics of construction activities. The Group seeks to minimize the negative impact by conducting work in a manner that complies with the law and the rules of social intercourse, and rigorously enforcing order from contractors on and around construction sites. In the event of a significant negative impact, the Group relies on protection mechanisms provided by the state.

The Group does not offer the community a special channel for reporting irregularities, violations or concerns, but it is possible to do so by personally reporting the problem to the construction manager, contacting (in person, by email, by phone) the sales office (in the case of Archicom's residential projects) or contacting Group companies through publicly available channels on websites or through social media profiles.

According to the Group's policy, every report on the operation of a construction site should be registered, along with a description of the problem and the steps taken to resolve it. In 2023, the Group registered 8 such reports. The Group does not promote these channels of contact among the community and has not implemented a policy to protect those who report against retaliation.

## Organizations we are part of

Over the years we have gathered unique experience and business knowledge. We share best practices, give opinions on new solutions, thus co-creating and promoting the property development industry in Poland. We are members of important organizations. In 2023 we were active in the following organizations:

### Economic organizations

- British Polish Chamber of Commerce (BPCC)
- American Chamber of Commerce in Poland (AmCham Poland)
- Polish Confederation Lewiatan

### Other organizations

- Association of Stock Exchange Issuers (SEG)
- Association of Individual Investors (SII)
- Lepszy Służewiec Association
- Responsible Business Forum

### Real estate, industry organizations

- Polish Chamber of Commercial Real Estate (PINK)
- Polish Association of Developer Companies (PZFD)
- Proptech Foundation
- Association of Home and Apartment Builders (Archicom)
- Polish Association of Construction Employers (Archicom)



## Taking action on material impacts on affected communities

ESRS S3-4

In the double materiality study process, the Group did not identify material negative impacts on affected communities, and therefore does not have a policy for managing such impacts. The Group also does not identify material risks to itself related to impacts on communities.

To ensure that the Group's land planning, land acquisition and construction practices do not negatively impact local communities, the Group has the following measures in place:

- carrying out projects in line with the law and internal procedures,
- working closely with administration,
- use of reputable architects,
- use of recognized contractors,
- high labor and management standards at construction sites,
- use of its employees' experience and knowledge.

As part of its projects, the Group invests in urban infrastructure, improving the network and quality of sidewalks, roads, bike paths, urban greenery and more. This is in compensation for the inconvenience caused by the construction processes carried out on behalf of the Group. Another way of cooperating with local communities is through social and charitable initiatives.







## Examples of the Group's social actions in relation to local communities

- funding of a bust of Józef Bem, patron of the LXV High School in Warsaw,
- supporting the Monar Foundation in Warsaw,
- establishment of two new floral meadows in cooperation with the Meadow Foundation, in Wrocław and Łódź,
- operation of free bicycle repair stations in two Archicom residential developments,
- building a bike path in the Olimpia Port estate in Wrocław by Archicom,
- supporting the "Rewir Twórczy" Association by Archicom for the purpose of developing the Community Garden at Swojczycka Street in Wrocław,
- providing a donation to the Wrocław University of Economics to support the Wrocław Academic Run,
- creation of a green patio at the XXXII High School in Łódź as part of the "Łódź Schools for Climate" program. The Group has also prepared detailed designs for five other courtyards at grammar and primary schools in the city.

In 2023, no human rights breaches were disclosed in connection with the Group's impact on communities.

Management of material risks relating to affected communities in the Group is carried out through the overall risk management processes.

## Goals for managing material negative impacts, improving positive impacts and managing material risks and opportunities

ESRS S3-5

In the issue of the impact on local communities, the Group's goal is described in the ESG Strategy: it is to ensure that 50 percent of its projects under construction and in the pipeline will be "destinations," defined as multi-stage projects with a public space component, access to urban amenities such as public transportation, daily shopping, and educational facilities. This is a goal set internally based on the Group's expected potential and the market's available land bank. As of the end of 2023, the indicator was 40 percent, due to the low supply of suitable sites and problems with administrative procedures.





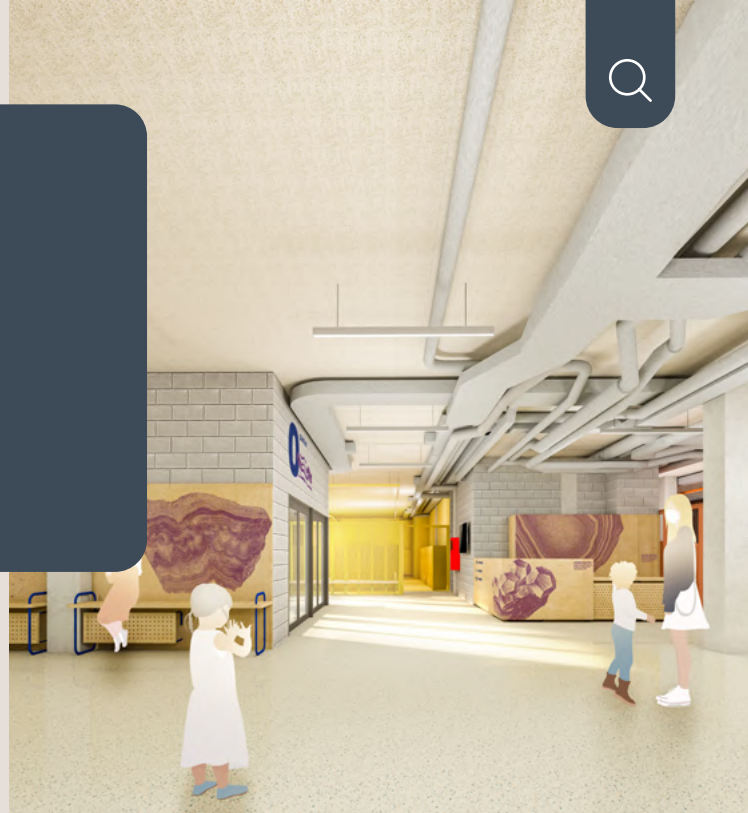
# Public school at Konstruktorska Street

start of construction:	2023
location:	Warsaw
architectural firm:	WWAA
usable area of buildings:	4 871 sqm

In 2021, we received permission from the City Council to develop a residential estate for about 1,600 residents in the industrial area of Służewiec Przemysłowy, under the procedure of the so-called housing special act. We have prepared a project to replace the oldest office buildings in the area of Woloska, Konstruktorska and Domaniewska Streets with modern residential buildings.

The construction of a school in Warsaw's industrial district of Służewiec Przemysłowy accompanies the development of the city-forming Modern Mokotów residential project by Archicom of the Echo Investment Group under the procedure of the so-called housing special act, which is in line with the 15-minute city concept.

We are transforming this part of the capital - until now known mainly as an office area - into a place comfortable for everyday living, offering easy access to public transportation, education, services and interesting leisure activities, as well as more than 3.5 hectares of green space.



This is the first public school in Poland built for the city by a private investor.

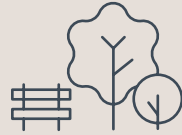
The new school was designed by the WWAA design studio, whose architects are co-authors of the so-called Warsaw educational standards for good planning of educational facilities.







two-story building with classrooms, labs, cafeteria, spaces for sports and a public library



open square - a meeting place that will benefit residents of all age groups



many environmentally friendly solutions, such as partial power supply from photovoltaic panels or the use of gray water for flushing toilets and watering plants



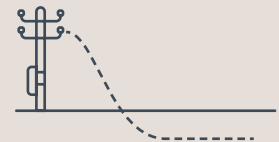
## Public investments for the Służewiec community



introducing a greater balance between building functions in the area, moving from office mono-functions



creation of a public grammar school for 450 children at the expense of a private investor



relocation underground of a high-voltage line along Woloska Street



creating in place of car parks along Woloska Street an attractive and accessible green area, serving as a pedestrian and bicycle route



investing in two green areas starting from Suwak Street and securing their status as green areas in the local plan



investments in road infrastructure in the area

# Clients and end users

ESRS S4

The purchase of an apartment is often one of life's most important decisions. Renting an office or commercial premises can determine business success. As we understand the importance of decisions in the real estate market, we take an individual approach to each client. Understanding their needs guarantees building a loyal relationship based on high ethical standards. Among our clients, there are individual customers purchasing flats for themselves or their families, as well as investors purchasing the property as a capital investment or retirement security. Our clients also include companies renting office or retail space for their business and large international funds specialising in real estate, buying entire office buildings, residential buildings or shopping centres.

We consider focusing on the client's needs and skilful communication to be the initial point of building a relationship with the client. From a sales perspective, it is important to select communication tools that allow the client to realistically assess the quality of the flat or office, understand all aspects of the potential transaction, and result in making a rational purchase decision.





Clients and end users are among the Group's significant stakeholders. They are in particular:

- Users of the projects built by the Group (people working in offices or shopping centres built by the Group, customers of shops, service centres, restaurants in the Group's buildings, visitors to public spaces around the Group's projects);
- Clients (in particular individuals purchasing apartments from Archicom)

## Group's impact on major stakeholders

Stakeholder	Impact
Users of office buildings, shopping centers, public spaces	<p><b>Positive:</b></p> <ul style="list-style-type: none"> <li>• functionality, usability, accessibility and high quality of new buildings;</li> <li>• provision of an attractive commercial offer (stores, service outlets, restaurants, cafes);</li> <li>• delivery of well-designed, safe urban space</li> </ul>
Clients buying apartments	<p><b>Positive:</b></p> <ul style="list-style-type: none"> <li>• possibility to take advantage of Archicom's residential offer;</li> <li>• ensuring complementary services to apartments (stores, restaurants, service outlets, etc.).</li> </ul> <p><b>Negative:</b></p> <ul style="list-style-type: none"> <li>• risk of being misled about what is being offered;</li> <li>• risk of entrusting the Group with your sensitive data.</li> </ul>

The Group does not cooperate directly with clients and users of the Group's projects and does not research their interests, opinions and risks of violation of their rights, as it has not identified such a relevant issue. The due diligence process did not identify any significant relationship between the Group's strategy and business model and the interests of clients and consumers. Therefore, the Management Board has not analysed whether the strategy and business model perform a role in creating, exacerbating or mitigating significant impacts on consumers or end users. These issues are also not the subject of work by the Management Boards and Supervisory Boards.

Opinions of clients and end users may influence some aspects of the Group's operations.

- Opinions of clients and end users regarding the Group have been taken into account in the development of this report as part of the double materiality testing.
- Opinions of potential clients and end users are taken into account in the process of designing buildings and spaces, as described in S3 indicator above.
- Client evaluations and opinions shape the commercial offer of both Groups and are taken into account in the design of future projects.
- Clients and end users influence significant awards and distinctions for the Group's projects such as those organised by the media, with voting opportunities for all.

## Material impacts, risks and opportunities and their interrelationship with strategy and business model

ESRS2 SBM-3

Actual and potential impacts on consumers and end users, as identified through the dual materiality process, do not arise from, shape or relate to the strategy and business model.

The negative impacts identified for this Group are incidental.

### In brief

#### Material topic due to double materiality study

Scope	(S) social
ESRS	S4 Clients and end users
Material topic	<b>Personal safety of consumers or end users</b>
Impact description	<b>Creating safe spaces</b>
Impact assessment	<b>Positive</b> , potential
Responsibility	Departments of Architects
Scope	Users of buildings developed by the Group

#### Echo Investment Group's material topic disclosures

<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>No defined policy</li> </ul> <p>Actions are justified by the demand of the Group's clients, mostly funds acquiring finished buildings and tenants of those buildings. An issue regulated by the BREEAM certification process and internal technical standards for buildings.</p>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>Designing in line with experience of Group and hired architects</li> <li>No significant financial outlay</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>Providing compliance with requirements of building regulations and other legislation</li> <li>Ensuring maximum comfort of buildings and urban spaces for users with special needs</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	<ul style="list-style-type: none"> <li>BREEAM certification for commercial buildings (office buildings)</li> </ul>

The Group's strategy is based on co-creating cities through the development of large, multistage projects with a significant component of open, public and accessible space. Public spaces in many senses also include commercial buildings: office buildings and shopping centres. The Group takes responsibility for the safety and meeting appropriate standards of all users of the created spaces.



## Creating a safe space includes

- functional architectural design
- proper lighting
- well-designed communication routes,
- no architectural barriers for users with special needs,
- use of safe, natural, certified materials,
- high-quality equipment to provide proper building ventilation, thermal comfort, and air quality.

## BREEAM certification

All the Group's commercial buildings (office buildings) are certified under the international BREEAM system. The system is one of the most popular environmental certifications in Europe, and it assesses buildings according to eight objective criteria and clearly defined technical parameters: management, health and well-being, energy, transport, water, materials, land use and ecology, pollution.



## In brief

### Material topic due to double materiality study

Scope	(S) social
ESRS	S4 Clients and end users
Material topic	<b>Social inclusion of consumers or end users</b>
Impact description	<b>Creating inclusive spaces</b>
Impact assessment	<b>Positive</b> , potential
Responsibility	Departments of Architects
Scope	Users of buildings developed by the Group

### Echo Investment Group's material topic disclosures

Policy [MDR-P]	<ul style="list-style-type: none"> <li>No defined policy</li> </ul>
Actions and resources [MDR-A]	<ul style="list-style-type: none"> <li>Limiting the design and construction of gated estates</li> <li>Developing the idea of accessible cities</li> <li>No significant financial outlay</li> </ul>
Goals [MDR-T]	<ul style="list-style-type: none"> <li>Building open and accessible city parts</li> <li>Building the image of a modern developer</li> </ul>
Metrics (indicators) from ESRS [MDR-M]	<ul style="list-style-type: none"> <li>Indicator of the share of projects under construction that are not gated and offer free access to city users</li> </ul>

### Share of open (non-fenced) projects in the Group's total portfolio under construction

	2022	2023
Portfolio size under construction [sqm of usable space]	345 200	435 300
Open projects [sqm of usable space]	307 900	405 200
Indicator	89.2%	93.1%

All commercial buildings constructed by the Group are certified to the international BREEAM standard. It is currently one of the most popular environmental certifications in Europe. It is a method that allows us to assess buildings according to 8 objective criteria and clearly defined technical parameters: management, health and well-being, energy, transport, water, materials, land use and ecology, and pollution.

One of the criteria for achieving this standard is the accessibility of the building. In this category, buildings receive additional points for safe access for pedestrians and cyclists (design of pedestrian and cycle paths of adequate width, areas for egress, facilities for limiting the speed of vehicles, access for unloading and appropriate areas for delivery vehicles). Another point can be received for design appropriate to the needs of all potential users and in such a way as to be accessible to them. In this matter, it is crucial to pay attention to the functional layout, signage, visibility, priority access for specific user groups, the inclusion of people with disabilities, as well as access for emergency services.



## Policies related to consumers and end users

ESRS S4-1

The Group has not identified any material risks related to the human rights of consumers and end users in its own operations or in the value chain. The Group's policies in this area are based on the universal human rights and other policies described in detail in ESRS2 S1-1 indicator of this chapter.

### In brief

#### Material topic due to double materiality study

Scope	(S) social
ESRS	S4 Clients and end users
Material topic	<b>Social inclusion of consumers or end users</b>
Impact description	<b>Use of unfair sales practices</b>
Impact assessment	<b>Negative</b> , potential
Responsibility	Member of the Management Board for Sales of Archicom
Scope	Marketing practices used

#### Echo Investment Group's material topic disclosures

Policy [MDR-P]	<ul style="list-style-type: none"> <li>Code of Conduct</li> <li>Data security policy</li> </ul>
Actions and resources [MDR-A]	<ul style="list-style-type: none"> <li>Acting in line with the law and industry rules</li> <li>DPO function</li> </ul> <p>No significant financial outlay</p>
Goals [MDR-T]	<ul style="list-style-type: none"> <li>Compliance with legal requirements is ensured</li> </ul>
Metrics (indicators) from ESRS [MDR-M]	<ul style="list-style-type: none"> <li>Number of incidents related to unfair sales practices and data protection</li> </ul>



## Protection of personal and sensitive data

Due to the nature of apartment sales, the protection of sensitive client data may be considered an important area of risk. The purchase of a flat involves sharing a significant amount of personal and sensitive data with the Group. The Group manages data through a secure CRM system, which organises the flow of correspondence and information transfer with clients and restricts access to data to unauthorised parties.

Access to and management of client and Group data are governed under the written Data Security Policy in Echo Investment. At Archicom, no such document exists, but the Group implements the security policy through 'Cyberhero' training- a regular training with a test that takes place at least once a quarter and reminds all employees of basic rules for managing sensitive data, activity in social media, the Internet or principles related to cyber security.

The training sessions, followed by tests, are provided to employees by the Infrastructure and Security Department. All the new employees are informed of the Privacy Statement. This year it is also included in the training for all employees. The privacy policy is also available on the website.

All group companies are provided with a function relating to data protection: in Archicom, it is the Data Protection Officer, and in Echo Investment - the lawyer appointed for personal data protection matters.

## Fair marketing

Pursuant to our Code of Conduct, the Group's Public Relations, Investor Relations and Marketing communication are based on honesty and truthful messages. We do not use misleading communication methods, and we discuss all matters relating to our business openly with our stakeholders.

Among the business activities conducted by the Echo-Archicom Group, the most essential external sales and marketing regulations concern the sale of apartments to individual clients. In relations with clients, the most significant document describing the apartment being purchased is a binding prospectus i.e. an annex to the developer agreement. The obligation to have a prospectus applies to every apartment sold. In 2023, the Group did not record any reports of non-compliance with the regulations of information provided in marketing materials or prospectuses or provided during face-to-face meetings with account managers.



## Cooperation processes for interaction with consumers and end users

ESRS S4-2

The Group has not implemented a general process for cooperating with consumers or end users in managing actual and potential impacts. Such cooperation, if it occurs, is driven by specific circumstances and needs. The Management Board considers this approach to be the most effective. Clients and end users are not invited to cooperate with the Group on its strategy and business model.

The Group may enter into cooperation with organisations or other entities authorised to represent a specific client or user group. Such cooperation may influence management decisions.

The Group has not identified any clients who may be highly influenced or marginalised within their relationships with the Group. The Group has also not designated any person or function responsible for dialogue with clients. If such cooperation exists, responsibility is ad hoc, depending on the scope and purpose of such cooperation.



### Archicom's cooperation with clients

Purchasing an apartment is a life decision for the majority of clients. We ensure that we facilitate it and support clients throughout the process and afterwards.

Each client has an individual account manager who, following the conclusion of the development agreement, undertakes the duties of a sales advisor and supports the client until they take up residence in the estate.

We are constantly developing the Client Portal, which offers access to all information about the purchased property and includes the most important documents, the payment schedule, but also special offers and updated construction photos.

We conduct client satisfaction surveys, which provide information on the quality of service, purchase preferences and project expectations. The results of these surveys are analysed within the Archicom team and are a starting point for the improvement of processes, offer and service.

During the sales process, we have identified twelve key moments where we study clients' satisfaction by emailing them surveys and inviting them to share their opinions on their level of satisfaction. The survey is not just limited to measuring the Client Satisfaction Score (CSAT) and Net Promoter Score (NPS), but also includes additional stage-specific questions and therefore provides detailed information about the experience.

In 2023, due to the integration of Echo Investment's residential part into the Archicom Group, we carried out a process of integrating the two organisations' systems and best practices for client surveys.



# Remediation processes for negative impacts and channels for consumers and end users to report problems

ESRS S4-3

According to the double materiality study, the negative impact on the Group's clients may involve unfair marketing or data protection practices. The Group assesses both risks as incidental.

## Methods of reporting and redress

Issue	Method of reporting	Method of redress
Unfair marketing	<ul style="list-style-type: none"> <li>Client account managers (Group employees)</li> <li>Third-party mechanism: courts, the Office of Competition and Consumer Protection</li> </ul>	Cessation of infringement, compensation, apology
Protection of personal data	<ul style="list-style-type: none"> <li>Data Protection Officer of the Group</li> <li>Third-party mechanism: the Personal Data Protection Office, court</li> </ul>	Apology, compensation, reimbursement of costs incurred (e.g., replacing documents), filing with the Personal Data Protection Office

In the event of a personal data breach, the Group informs all potential concerned (those whose personal data may be collected) about the channels for reporting breaches, the possibility of deleting the data and the method of data management through appropriate clauses e.g. on the website or in statements attached to documents. Any breaches in this area are monitored and resolved in accordance with applicable law and internal procedures. The Group has not implemented any specific policies and procedures to protect consumers from retaliation, as it considers not to be effective. The Group does not take measures to assess clients' awareness of and their trust in the structures for reporting concerns and needs and their confidence in these mechanisms.





## Taking action on material impacts on consumers and end users

ESRS S4-4

In 2023, the Group experienced three data breach incidents. Two of them were serious and required the notification of the Personal Data Protection Office. In each situation, the Group implemented the preventive and corrective actions provided for by the procedure.

In 2023, there was no confirmed breach of the law in the Group's sales and marketing practices.

In order to monitor the effectiveness of its policies, the Group uses information about policy breaches, their sources and the actions taken. In the opinion of the Management Board, the policies on data protection and fair marketing are fulfilling their role and will be adapted to meet the requirements of the law and its objectives.

## Goals for managing material negative impacts

ESRS S4-5

For the implementation of its policies regarding impacts on clients and end users, the Group's objective is to ensure effective protection of clients' personal data, fair marketing and compliance of its activities with the law. The Group has not adopted any additional objectives in this regard.





# We create spaces good for work

Offices foster interaction and stimulate development. They are places where it is possible to feel like a team, work creatively, share experiences and be inspired. Therefore, we create workplaces that make one want to come to.

The concept of great working spaces is intended to meet the changing needs of users. Therefore, offices should be flexible, provide more collaborative spaces, enable comfortable work in silence, and simultaneously promote well-being.

## Offices ready for action

Echo Investment's cooperation with tenants does not end with signing a contract. The team of interior designers (fit-out) supports companies choosing space from Echo Investment in the coordination of the office fit-out process. The team is responsible for coordinating the preparation of office space for tenants and cooperation with architects and contractors. We know how to create places to work that are not only functional but also inspiring. Turnkey offices are our speciality.

## Awards and prizes in 2023



Echo Investment's operations in the office real estate sector in major Polish cities were honoured with the Eurobuild Awards 2023 in the category 'Office Developer of the Year, CEE'. Its involvement in city-building destinations projects resulted in an award for the concept in the 'Best Green City/Community Initiative' category of the PLGBC Green Building Awards 2023.





# Swobodna SPOT office buildings

start of construction:	2023
location	Wrocław
architectural firm:	Kuryłowicz & Associates
lease area:	41 600 sqm



Echo Investment's latest project is a state-of-the-art approach to creating office space, comprising two premium office buildings in the heart of Wrocław. The project is located at 60 Swobodna Street, a strategic point in the city's business center. The first building will be completed in the second quarter of 2025, and the second building is planned for the third quarter of 2026.

The architectural design was focused on blending harmoniously into the urban fabric, taking into account both aesthetics and functionality. An urban

walkway, connecting both structures, is intended to provide a pleasant place for both employees and the local community. Greenery, rooftop recreational terraces and common spaces will provide a friendly environment for work and relaxation. A café, restaurant and service establishments on the ground floor will help expand the area's range of possibilities. With the construction of the office spaces, we are aiming for the BREEAM certification at the "excellent" level, which will confirm our commitment to protecting the environment through rational management of energy, water and waste monitoring.



## Energy-saving solutions:



use of grey water for watering plants



air purification



charging stations for electric vehicles

# Offices - Standards and amenities

## BREEAM certification

All Echo Investment office projects are certified under the international BREEAM environmental system - one of the most popular in Europe. It is a method that verifies many features of a building, allows it to be evaluated according to 10 objective criteria and clearly defined technical parameters: management, health and well-being, energy, transport, water, innovation, waste, materials, land use and ecology, pollution.

BREEAM is a certification of the quality and high standard of a project. An office with a "green stamp" is not only an ecological and economical choice, but also a comfort for users. It is a guarantee that they are in a place that is friendly to both people and the environment.

In 2023, the following office buildings received the BREEAM certification:

at the project (interim) level:

- Brain Park C — the „excellent” level.

at the as-built (final) level:

- Browary Warszawskie G and H — the „excellent” level,
- MidPoint71 in Wrocław — the „excellent” level,
- Brain Park A and B w Kraków — the „excellent” level
- Fuzja C and D w Łódź — the „excellent” level,
- Fuzja J in Łódź— the „very good” level.

2023



### WiredScore Platinum

for the Brain Park office building in Kraków

### WiredScore Gold

for the React office building in Łódź

The certificate confirms the best digital communication, quality of teletechnical solutions and emergency plans that ensure companies can act in case of unforeseen events.

## WELL Health and Safety certification

We are improving standards related to safety, a good environment for working and social interaction in our offices. In 2022, we introduced the WELL Health and Safety certification, which focuses on five main areas that improve the safety and quality of work of our building users: disinfection and cleaning procedures, emergency preparedness plans, healthcare availability, high water and indoor air quality, and stakeholder engagement as well as communication.

We also support tenants' well-being in a friendly way, through green solutions or the ability to flexibly adapt office space to their current needs - working individually or in groups, relaxing, focusing, or meeting with contractors. Because the WELL Health and Safety certification requires prioritizing the health and safety of tenants, visitors and staff, it is therefore awarded for only for one year, which motivates owners and managers to continually review procedures and renew the certification.

In 2023, WELL Health and Safety certified office buildings:

- Brain Park A and B w Kraków
- React in Łódź
- City 2 in Wrocław



## Echo Pure Office

Providing the healthiest and safest possible working environment in offices is one of the most important technical parameters that potential tenants and building buyers pay attention to. Taking into account lessons learned from the pandemic, we have implemented our original Echo Pure Office standard, which applies to all our office buildings. It ensures the safety, good working environment and social interaction. With hindsight, we see that tenants have confidence in the effectiveness of these measures and fully consciously choose our buildings.



energy-saving lighting



smoke detectors and hyperventilation



energy efficient air conditioning and ventilation system



optimal access to daylight



tilt windows



natural materials



RCI ActivePure technology



finishing materials easy to disinfect



"Five for Safety" program



noise protection



A-class office space



safe fixtures in toilets and, if possible, touchless opening systems

### "Five for Safety" program

We have prepared a special guide for office space managers entitled "Five for Safety." It has been in place since 2020, and contains descriptions of rules and actions centered around the five areas of disinfection, protection, keeping distance, information and communication, including recommendations for hygiene and safety maintenance standards. During the COVID-19 pandemic, the guide was given to every Echo Investment office building manager. The manual is also available to companies and organizations that want to implement similar standards in their buildings. We launch the "Five for Safety" program in a state of high necessity, for the health and safety of office users.

### RCI ActivePure

This is a solution in an office building ventilation system that eliminates microorganisms in the air. It is based on the natural phenomenon of photocatalysis. It generates strong, but safe for humans, oxidants that deactivate biological viral and bacterial contaminants both in the air and on surfaces without the use of chemicals. This technology is being used by tenants in React I in Łódź, MidPoint71 in Wrocław, West 4 Business Hub in Wrocław, and Brain Park I in Kraków.

# CitySpace

## Standards and amenities

Owned and operated by us, CitySpace - one of the largest operators of flexible offices in Poland - provides co-working spaces such as service offices, coworking, virtual address for businesses, elegant meeting rooms, and offices.

The CitySpace's offices support the tenets of ESG, adapting to the new situation facing the economic crisis. The operator chooses to locate its locations in top A-class office buildings, where sustainable construction, quality and ecology are the standard, confirmed by the BREEAM environmental certifications of "excellent" or "very good."

New CitySpace offices opened in 2023 include an expanded 230-station space in the MidPoint71 building in Wrocław and a debut location in Łódź with a 2,000-square-meter space in the Fuzja mixed-use complex. CitySpace Fuzja is the operator's first project that we develop as the building's exclusive tenant.

CitySpace offers short-term, flexible services that our clients use for years.

The satisfaction survey index regarding our service is 8.9/10 for the entire network.

### 3 411

total number of workstations currently on offer at CitySpace

### 29 100 sqm

total area of CitySpace office space at the end of 2023

### 13

number of locations in the CitySpace portfolio in 6 cities: Warsaw, Wrocław, Kraków, Katowice, Gdańsk and Łódź.



### Amenities:



Reception service



IT infrastructure - symmetrical internet connection 200/200 Mbps



Offices and rooms adapted for online meetings



Showers and locker rooms for cyclists

# CitySpace flex office in Fuzja

opening:	2023
lokalizacja:	Łódź
flexible surface:	2 000 sqm
number of workstations:	300



This is the 13th project of the operator in the country and the first in Łódź. The branch offers a total of 2,000 sqm of modern business space. CitySpace in Fuzja provides a whole spectrum of possibilities - from individual workstations and small office spaces, to an entire floor arranged according to tenant's needs.

In 2023, three modern conference rooms, 55 offices and more than 300 workstations are available to users. Creative co-working spaces and relaxation

areas are located on its ground and first floors. The CitySpace community has a fully equipped kitchen, cozy rest areas, as well as a gaming space.

Tenants have a full suite of services at their disposal, including front desk support, cleaning service and access to dedicated IT infrastructure. Through the CitySpaceApp application, it is possible to book a conference room or rent a desk without unnecessary paperwork.

# CitySpace flex office in MidPoint71

opening:	2023
location:	Wrocław
flexible surface:	4 200 sqm
number of workstations:	615



In 2023, CitySpace in the MidPoint71 building was expanded by 1,400 sqm with 230 new workstations. It now totals 4,200 sqm of space offering 615 ergonomically designed workstations. Here, clients have a choice of space in 80 private offices or at shared desks in a coworking area.

The operator-managed space also features 11 diverse, fully equipped meeting rooms and comfortable quiet work areas. Spacious kitchens and a relaxation area

are also available to the community.

There are already four CitySpace locations in Wrocław, offering a total of nearly 1,550 workstations. The brand's serviced offices are also located in Aquarius Business House at Swobodna Street right next to the Central Railway Station, in Nobilis Business House at Curie-Skłodowska Street near Pasaż Grunwaldzki, and in West 4 Business Hub at Na Ostatnim Groszu Street in the western part of the city.



In 2023, we surveyed for the second time the satisfaction level of individual clients using CitySpace flexible offices.

We carried out the survey in the following areas:

Location



9,0/10 pts

Building\*



8,8/10 pts

Cleanliness



8,8/10 pts

Communication



8,6/10 pts

Design



8,5/10 pts

IT infrastructure



8,7/10 pts

\* The building where CitySpace is (9 out of 12 buildings, were developed by the Echo Group).





# We create spaces good for living

We care about the human dimension of architecture, its coexistence with nature and the context of locations. We build places, not just apartments, to live for people with different needs and desires. That's why we have equipped our estates with:

5  
playgrounds



21  
Pakomatic machines



The postal and courier parcel pick-up point, a neighborhood storage facility where couriers can leave a package for an absent resident.

Moje Echo



The platform for client support after the purchase of an apartment or unit, which allows for quick payment and synchronization of the repayment schedule. It also provides the ability to live chat with a consultant and view the appointment calendar.

1  
Used-clothing  
collection machine



The result of cooperation between Archicom, 4F and Ubrania do oddania brand.

327



Blue Bolt applications  
(in entrance doors and elevators)

The application that replaces keys and entry cards to our estates. With a smartphone, it is possible to open a garage door, a barrier and order an elevator.



1



Echo Share mobility point

We were the first in Poland to design an estate mobility point - Echo Share. As a result of cooperation with Keratonik and Veolia, residents of the Zenit estate in Łódź have their own fleet of electric vehicles at their disposal with access via an app. The mobility point is also equipped with a full charging infrastructure. The first vehicle was rented in spring 2023.

Echo Share fleet:

- electric scooters;
- electric bicycles, including a cargo bike;
- a passenger car;
- planned: a van.



3

### Paczkomat machines

We were the first developer in Poland to sign an agreement with InPost and since 2021 we have equipped residential projects with Paczkomat machines.



33

### charging stations for electric vehicles

We launch in our estates thanks to cooperation with the Veolia Group.



### Smart Home

Smart home technology that allows to remotely adjust temperature, lighting or the level of window opening to one's needs using a smartphone. The solution helps optimize energy consumption, save money and protect the environment.

2 349

apartments were equipped with a smart home system

1

### sports ground



691

### bicycle hangers



112

### bicycle stands

2

### bicycle repair stations



2

estates with a system for draining rainwater or snowmelt from various types of surfaces.

Such obtained water is used to water estate greenery.

1

### book exchange station



Its idea is to share the joy of reading with neighbors.

# Modern Mokotów I estate

Archicom

start of construction:	2023
location:	Warsaw
architectural firm:	BBGK Architekci
area (apartment usable area):	29 900 sqm



Modern Mokotów will revolutionize the existing office landscape between Wołoska, Domaniewska and Po-  
stępu Streets in Warsaw. Fully integrated with its sur-  
roundings, the residential estate will not only change  
the face of the former office enclave, but will become  
one of the most interesting neighborhoods with a rich  
educational offer and recreational areas in the capital.

The project involves the completion of three buildings  
in the first phase, also with exclusive apartments. The  
first building will have 356 apartments and two cour-  
tyards, while the second will have 144 units and one  
courtyard. In addition, there will be a higher-standard  
cozy building, Apartamenty przy Kwitnącej Wiśni, with  
40 apartments ranging from one-bedroom studios to  
five-room spaces with floor areas of up to 142 sqm.

The project will not be limited to apartments only.  
The estate will have a retail and service zone and  
many amenities for residents, such as a do-it-yourself  
workshop and coworking spaces. Everyone will be  
able to enjoy lush green areas, playgrounds, fitness  
areas, a bicycle track and a cozy amphitheater. Plac  
Przemiany will become a central gathering place, sur-  
rounded by numerous restaurants, cafes and boutiqu-  
es. The project places a strong emphasis on ecology,  
offering nearly 1.5 hectares of urban parkland along  
Woloska Street and 2.1 hectares of carefully designed  
greenery inside the estate. A distinguishing feature will  
be a green neighborhood path that will lead strollers  
along a playground toward gardens of three colors  
and green courtyards.

The project focuses on the community's develop-  
ment through modern educational infrastruc-  
ture. The project will include building a fully equipped gram-  
mar school along with a pre-school division, with an  
emphasis on ecology and sustainable values. The  
facility at Konstruktorska Street will benefit nearly half  
a thousand students.

Modern Mokotów is not just a residential estate, but  
a comprehensive transformation of the area, which  
will contribute to shaping a new face of this part of  
Warsaw - closer to life, sustainable and friendly to  
local communities.



## Amenities:



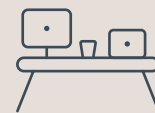
public fitness areas and  
a bicycle track



playgrounds and family  
meeting places



more than 3.5 hectares  
of green areas and six  
thematic gardens



do-it-yourself workshop  
and coworking spaces  
for residents



# Olimpia Port estate

Archicom

start of construction:	2011
location:	Wrocław
architectural firm:	SRDK STUDIO PROJEKT
usable area of buildings:	164 920 sqm



Olimpia Port is a residential estate located on the banks of the Oder River in Wrocław, which we developed between 2012 and 2023, with 2,934 apartments. It is one of the largest comprehensively developed residential projects in Poland. Olimpia Port is located in an extremely charming part of Wrocław. Its buildings and urban layout are reminiscent of nearby Sępolno and Biskupin, estates designed according to the garden-city idea. The squares in Olimpia Port are full of plants - colorful flowers, small shrubs, preserved old-growth trees and spreading trees in a total of more than 6 hectares of green space. A short distance away is Columbus Park.

While Olimpia Port's name functions as an "estate," its size is closer to that of a mixed-use district. Its residents can enjoy rich public spaces, where they will find restaurants, stores, outdoor and indoor recreation areas. There are a clinic, pharmacy, hairdresser, veterinarian, nursery and kindergarten. There is also a boulevard along the Oder's shipping channel, as well as a boat landing. A number of parks, playgrounds and plenty of greenery fill the space between the buildings. The project itself features bicycle and walking routes, and sports enthusiasts can enjoy a fitness club and sports fields. In turn, families with children can spend time at as many as twelve playgrounds.

## Amenities:



a resident's club and 2 fitness rooms



floating piers and a riverside boulevard



more than 20 service premises



2 playgrounds, outdoor ladders and pumptrack bikes



a marina with a fountain and a lounging area



the revitalized Brick Factory building



12 playgrounds



1.5 km of bicycle paths integrated into the city's bicycle network



6 hectares of greenery, accounting for 30% of the estate, which includes preserved mature poplar and birch trees



1 ha Barcelona square with greenery and a place to relax



elements referring to the history of the place - a revitalized tender and the use of historical transport rails in the architecture of the estate



# Apartments Standards and amenities

## Sustainable estates

It is a space where residents will find eco-friendly and modern solutions.



separate children's play area



car traffic-free zone



lighting of common parts of buildings with energy generated by photovoltaic panels



irrigating greenery with rainwater from retention



electric vehicle chargers



lower cost of energy bills due to solutions used to increase energy efficiency of buildings

# Self-sufficient estates

A sustainable estate means that we strive to make it self-sufficient. At the level of construction, as well as during operation, the estate should meet a number of requirements in terms of environmental impacts.

## During construction:



we segregate waste



protect plants and animal sites that are intended to be preserved



we monitor and optimize energy and water consumption during construction



we limit construction-related inconveniences related to the environment (noise, mud)



100 percent built-in wood is obtained from certified sources



we maintain safe working conditions

## During operation\*:



green areas are irrigated with rainwater stored in retention tanks



photovoltaic panels power common areas of buildings and car chargers



energy-saving LED lighting in common areas ensures better energy efficiency of the project



heat pumps allow to use renewable energy sources (RES)



green areas occupy min. 30 percent of the project site



heat islands are eliminated by, among other things, light-colored buildings and green roofs or walls

\* Solutions used in selected Archicom developments.



# We engage socially

The mission of our organization is not only to build modern places to work or live, but also to create a positive social impact. We are always guided in our actions by the conviction, that business development must go hand in hand with caring for the social world around us.

Our responsible approach to business ranges from promoting sustainability in projects to taking an active role in local communities. In 2023, we continue our mission by addressing challenges related to environment protection, social inclusion and supporting educational and charitable initiatives.

Our Group's social engagement policy is based on three pillars: sustainable development, support for local communities and education. Our social commitment includes active cooperation with local organizations, charitable initiatives and social projects that contribute to improving the quality of life of city residents.



In 2023, we received the Silver CSR Leaf, an honorable mention in the CSR Leafs competition of Polityka.

Our good practices are published in the Responsible Business Forum Report "Responsible Business in Poland", these include:

- Living green roofs or walls;
- Patchwork Łódź - architecture and urban planning competition;
- Młodzi w Łodzi - scholarship program;
- Łódź schools for climate;
- Echo-Łąka social program;
- Urban tree planting and tree protection.
- Zadrzewianie miast i ochrona drzew.





# Social engagement policy

We act responsibly and direct our commitment to communities that are close to us. We care about the transparency and effectiveness of our projects, and charitable actions are regulated by donation and sponsorship procedures, considering that actions should be related to the Group's strategy. We do not participate in or finance events or causes of a political nature related to politicians.

## Echo meadows grow in six cities

In 2020, we launched the ecological Echo-Łąka program, in cooperation with the well-respected Łąka Foundation. These efforts continued in 2023.

We create urban floral meadows that positively influence the microclimate, biodiversity and reduce smog. The program has already developed seven floral meadows with a total area of nearly 6,500 sqm: at Towarowa Street in Warsaw, in the vicinity of the sustainable Zenit estate in Łódź, in the surroundings of the planned project at Opieńskiego Street in Poznań, next to our headquarters in Kielce, at Bystrzycka Street in Kraków and at Pokoju Avenue in Wrocław. These are perennial meadows that have been created on areas managed by city institutions, but their care and maintenance is handled by Echo Investment and the Łąka Foundation. We intend to develop the project in the following years, so that our contribution to improving the climate and aesthetics of cities will be noticeable.

In 2023, three new flower meadows were created. A meadow was planted next to the West4Business Hub building, which has an area of 5.5 thousand sqm and is the largest floral meadow in Wrocław!

In Łódź, a meadow of 700 sqm was created next to the React office building.







## Youth in Łódź — scholarship program

In 2022, we joined the ranks of funders in the largest scholarship program #YouthInŁódź, carried out in cooperation with the City of Łódź. The funders, in their own chosen form, support students in the development of their talents and interests.

In 2023, the group of participants in the program expanded to a total of fifty-four male and female students from the Technical University of Lodz and the University of Lodz. From this group, we selected two new students to receive financial support for a year of their studies.

## Charity Real Estate Industry Beach Volleyball Tournament

Our team - as every year - represented Echo Investment at the Charity Real Estate Beach Volleyball Tournament, organized by JLL. As part of our engagement, we made a donation for the construction of the third Ronald McDonald House in Poland, which will be built at the Institute "Monument - Children's Health Center" in Warsaw. Thanks to the event, representatives of the real estate industry raised more than PLN 800,000 for this purpose.



## Poland Business Run

Runners-employees have represented the Group in the annual charity run organized by the Poland Business Run Foundation. Profits were donated to help individuals with musculoskeletal disabilities and those after mastectomy.

**35**



our employees from all over Poland ran in seven relay races.

04

# For stake- hold- ers

# Culture of ethical business conduct

ESRS G-1

Ethics, knowledge of legal regulations and maximum transparency are values that directly influence the perception of our Group among investors and stakeholders. Due to our respect for these core values, we have developed an excellent brand name in the market.

We intend to continue developing high standards of corporate governance and management in our daily work. We are aware that business success in the medium and long term is only possible if we act daily in line with the ethics, both of all employees and business partners.

We are supported in our goals for our stakeholders by a step-by-step roadmap leading the Group to transparent, equal and highest standards of governance.

## Our ambitions by 2030:



Promoting the ethical culture among employees through regular information, training and examinations



Compliance with the Good Practices of the WSE - annual analysis of possibilities to reduce the number of deviations



Shaping ESG awareness in the Management Boards and Supervisory Boards



Strengthen the promotion of the ethical culture among our contractors by regularly reviewing their compliance with our Code of Conduct, including with respect to issues of human and labor rights



# Business policies and corporate culture

ESRS G1-1

## Mission, vision, values of Echo Investment

Echo Investment's vision is "creating destinations." This phrase is difficult to translate into Polish, but it means creating places that attract residents, visitors, passersby, etc.

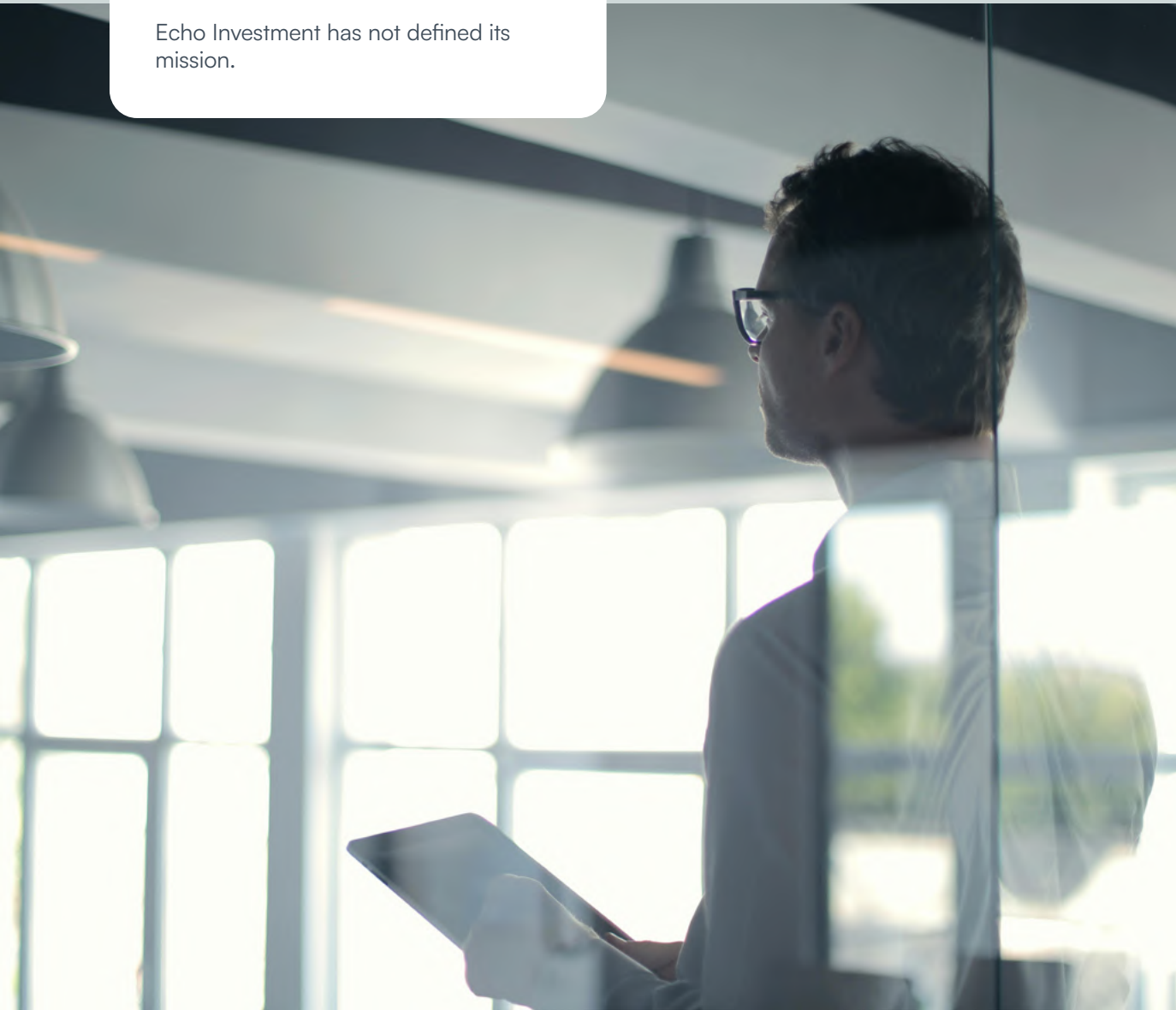
Echo Investment's values are set forth in its Code of Conduct and are applicable to the entire Group. These include:

- efficiency,
- competencies,
- integrity,
- trust,
- respect,
- responsibility.

Echo Investment has not defined its mission.

## Mission, vision, values of Archicom

In 2023, a process of reorganization of the Group was carried out, ending with the concentration of the residential business in Archicom. In connection with significant changes in business and organizational assumptions, Archicom conducted a process of analyzing its corporate culture, which culminated in the development of a new mission, vision and values. Their detailed description can be found in Chapter 3 of the report, in ESRS S1-13 indicator.



## Policies and corporate culture development

The Group anchors its corporate culture on a set of policies, procedures and mechanisms, the most important of which are:

- Code of Conduct,
- Work regulations,
- Anti-corruption code,
- Data security policy,
- Health and safety policy,
- Environmental policy,
- Sponsorship and donation procedure,
- Whistleblowing procedure,
- Procedure for handling whistleblowing reports,
- Recruitment and hiring procedure,
- Good Practices of Companies Listed on the WSE.

In addition to these, the Group has introduced and applied a number of other internal regulations that supplement corporate governance in specific areas. The fundamental and superior document in the Group is the Code of Conduct.

### What does the Code of Conduct apply to?

- principles of doing business, including a dialogue with stakeholders,
- due diligence and caution in the
- selection of business partners,
- how to conduct external communications with the market (Investor Relations, Marketing, Public Relations),
- selecting and managing cooperation with subcontractors,
- countering human rights violations,
- diversity and anti-discrimination,
- basic working conditions and employee development,
- quality of services offered,
- relations with public authorities and the market (prevention of conflicts of interest, anti-corruption),
- data security,
- confirms compliance with the UN Universal Declaration of Human Rights.



The Group's policies related to ethics and responsible business conduct apply to all employees, but also to contractors. We pay special attention to cooperation with construction companies and architectural firms (regarding construction site safety, environment protection, human rights), as well as architects and other professionals who represent the Group before state and local government institutions (anti-corruption issues, transparent business conduct).

The Group requires compliance with the principles established in the Code of Conduct by all suppliers, subcontractors, brokers, business partners with whom it has major contracts. Acknowledgment of the Code of Conduct and a contractor's statement of compliance with the provisions of the Code are mandatory elements (attachments) of major contracts.

## Promoting corporate culture and ESG matters

The corporate culture of both Group companies is promoted through training and ethics exams, as well as through internal communications (intranet, meetings with the Management Board, mailings, posters). In 2023, a great deal of attention in internal communications was paid to promoting ESG matters and educating employees on these issues. The Group's goal was to raise awareness of the importance of these matters in the Group's business operations.

### Role of administrative, management and supervisory bodies

ESRS2 GOV-1

The topic of management and supervisory bodies are described in Chapter 1 of this report.

### Description of processes to identify and assess material impacts, risks and opportunities

ESRS2 IRO-1

The topic of identifying and assessing material impacts, risks and opportunities is described in Chapter 1 of this report.

### Selected actions to promote corporate culture and ESG matters in the Group

- Training and examination on ethical issues for the entire Group,
- Two training sessions as part of the company's educational platform "Dzwonek na lekcję" on corporate climate competitiveness and business change related to increasing ESG requirements for the entire Group,
- Creation of a special section on Echo Investment's website to promote ESG matters,
- Competition for Archicom employees on ESG-related topics, after the publication of the 2022 Sustainability Report, zrównoważonego rozwoju za 2022 r.,
- Intranet articles promoting the two companies' educational, social and sponsorship activities,
- Use of upcycled and recycled materials to create folders, notebooks and business cards at Archicom,
- Promoting ESG activities in external communications (press releases, ESG sections in performance presentations, and social-media communications).





# Prevention and detection of corruption and bribery

ESRS G1-3

## In brief Material topic due to double materiality study

<b>Scope</b>	(G) Corporate governance
<b>ESRS</b>	G1 business conduct
<b>Material topic</b>	<b>Protection of whistleblowers</b>
<b>Impact description</b>	<b>Transparent whistleblowing system</b>
<b>Impact assessment</b>	<b>Positive</b> , existing
<b>Responsibility</b>	Director of the Legal Department or Vice-President, CFO (Echo Investment S.A.) and Member of the Management Board for Compliance or Chairman of the Supervisory Board (Archicom S.A.),
<b>Scope</b>	Own employees hired under employment contracts, persons providing work for the Group under other contracts

## Echo Investment Group's material topic disclosures

<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Whistleblowing procedure</li> <li>• Policy for handling whistleblowing reports</li> <li>• Work regulations and their appendices no. 2</li> <li>• Anti-corruption code</li> </ul> <p>The policy to support the monitoring and management of possible irregularities, develop employee awareness, avoid illegal activities, internal procedures and ethics, and ensure compliance with the requirements.</p>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>• Ethics training</li> <li>• Ethics onboarding for all new employees</li> <li>• No significant financial outlay</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>• 100 percent of own employees trained in ethics</li> <li>• No incidents related to protection of whistleblowers</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	<ul style="list-style-type: none"> <li>• 100 percent of own employees trained in ethics</li> </ul>

The primary tool for preventing allegations or incidents of corruption or bribery is the implementation of policies that constitute a coherent and clear system of ethical operation, as described above in the ESRS G1-1 indicator.

## Ethics training

The most important method of promoting corporate culture and ethical business conduct in the Group is through annual training followed by an exam. The training and exam primarily cover the matters described in the Code of Conduct, Anti-Corruption Policy and Whistleblowing Procedure. The training is mandatory for all of the Group's own employees and any new employee.

### Participation in ethics training and passing exams in 2023

	Management Board Members*		Exposed functions**		Other own employees***		Total	
	no.	%	no.	%	no.	%	no.	%
Total number of obligated persons, including:	9		104		518		631	
Archicom	4	100%	42	100%	261	100%	307	100%
Echo Investment	5		62		257		324	
Number of persons who participated, including:	9	100%	99	95%	501	97%	609	97%
Archicom	4	100%	42	100%	261	100%	307	100%
Echo Investment	5	100%	57	95%	240	90%	302	93%

#### Method of conduct and duration

Computer-based training	approx. 1 hour
Exam - online test	approx. 20 minutes
<b>Frequency</b>	once a year

#### Tematyka

Corruption	+
Donations and sponsorships	+
Whistleblowing	+
Values of the Group	+
Ethics in cooperation	+
IT security	-
EHS procedures	+
Human rights	+
Fair marketing	+
Personal data management	-

\*Members of the Management Boards of Echo Investment S.A. and Archicom S.A. are considered.

\*\*Employees of teams responsible for contracting, procurement of services and administrative procedures of projects.

\*\*\*Employees hired under a contract of employment, as well as those who continuously provide work for the organization on the basis of civil law contracts, mandate contracts, apprenticeships and provided by employment agencies.

## Participation in ethics training and passing exams in 2022

	Management Board Members*		Exposed functions**		Other own employees***		Total	
	no.	%	no.	%	no.	%	no.	%
Total number of obligated persons, including:	9		No data		No data		670	
Archicom	4	100%	No data	100%	No data	100%	160	100%
Echo Investment	5		No data		No data		510	
Number of persons who participated, including:	6	67%	No data	-	No data	-	536	80%
Archicom	4	100%	No data	-	No data	-	153	96%
Echo Investment	2	40%	No data	-	No data	-	383	75%

### Method of conduct and duration

Computer-based training	approx. 1 hour
Exam - online test	approx. 20 minutes
<b>Frequency</b>	Once a year





# Mechanisms for raising concerns

The Group has mechanisms in place to identify, report and investigate concerns about illegal behaviors, behaviors contrary to the Code of Conduct and other internal regulations. The basic mechanism that is used for this is whistleblowing and handling reports - through the general whistleblowing system. This topic is described in detail in Chapter 3 of this report (For people) under "Whistleblowing channels" - ESRS S1-3 indicator.

## Mechanism for handling whistleblowing reports

The mechanism for handling reports of suspected corruption is the same as the mechanism for handling reports related to negative impacts on employees. It is described in detail in Chapter 3 of this report (For people) under "Mechanism for handling whistleblowing reports" - ESRS S1-3 indicator.



## Protection of whistleblowers

The Group unequivocally protects whistleblowers and provides them with anonymity and security. It follows this in the Code of Conduct, Whistleblowing Procedure, Procedure for Handling Whistleblowing Reports, and Work Regulations. This topic is described in detail in Chapter 3 of this report ("For the People") under "Protection of whistleblowers" - ESRS S1-3 indicator.

# Anti-corruption code

The Group has implemented its Anti-Corruption Code, which regulates in detail issues of cooperation with public officials, issues of ties with public figures or public functions, how to deal with such cases, as well as key concepts in the management of anti-corruption procedures. The Group's anti-corruption code is not consistent with the United Nations Convention against Corruption. The Group will study in the future the possibility and appropriateness of reconciling the two documents.

The anti-corruption code is communicated to all employees and associates of the Group through onboarding, annual ethics training and examination, intranet, internal communication channels (meetings, mailings, intranet). Business partners are informed of the Group's Anti-Corruption Code (as well as other ethics documents) through the website. Their statement that they have familiarized themselves with these policies and declare to act in line with it is attached to an existing template of contracts signed with significant contractors.

All new contractors who will represent the Group in its dealings with administrative authorities should be verified in accordance with the "background check" procedure. This is an executive procedure for examining and verifying specific entities from the perspective of potential compliance or reputational risks.

## Functions most vulnerable to corruption and bribery

The Group assesses that the most exposed to the risk of corruption and bribery are employees with functions or responsibilities in the following areas:

1. Cooperation with public administration (responsible for negotiations, project agreements, development of executive projects, obtaining approvals and administrative permits);
2. Contracting construction services, purchasing goods and services.



## Anti-corruption in administrative processes

Features and mechanisms of the process of cooperation with public administration and public figures that reduce the risk of corruption in the Group:

- Employing qualified experts, often with long service, who are trusted, experienced, suitably competent to represent the Group and aware of risks;
- Detailed procedures for handling situations that may involve increased risks (invitations, cooperation with public figures, circumstances of conflict of interest, gifts);
- Participation in meetings with public officials always by at least two representatives of the Group (custom rule);
- Transparent donation and sponsorship policy, which requires a detailed background check of each potential beneficiary, justification of each transaction, and is multi-staged (each time conducted by the Ethics Committee and approved by the Management Board).

## Anti-corruption in the tendering process

Features and mechanisms of the contractor selection process that reduce the risk of corruption in the Group:

- The process involves a large group of experienced experts;
- The process is multi-stage;
- The team verifies offers for correctness and comparability;
- Specifically, offers that deviate significantly from the market average or other offers are analyzed. It is not uncommon for such offers to be rejected as a consequence of detailed analysis;
- Teams for procurement, contracting and optimization collaborate with construction teams in the selection of subcontractors and suppliers;
- All of the Group's significant subcontractors and suppliers agree (declaratively) to abide by the Group's Code of Conduct;
- Contracts of significant value are signed by two members of the Management Board.

The Group recognizes that there is a risk of exposure to corruption or bribery for all employees, so the Group requires all employees to undergo annual ethics training and pass the examination. For no group of employees does the Group undertake additional training and preventive measures.

## Ethics Committee

As stipulated in the Anti-Corruption Code, the implementation, updating and enforcement of its provisions and the organization of ethics training are supervised by the permanent Ethics Committees for Echo Investment and Archicom. These are advisory bodies to the Management Boards.

As of 31 December 2023, the Echo Investment Ethics Committee consisted of:

- Maciej Drozd  
— Vice-President, CFO
- Bartosz Guziński  
— Director of the legal department,
- Weronika Ukleja-Salak  
— Director of corporate communications.

As of 31 December 2023, the Archicom Ethics Committee consisted of:

- Agata Skowrońska-Domańska  
— Vice-President, CFO
- Agnieszka Mickoś-Banasik  
— Director of the legal department,
- Klementyna Sobieraj  
— Director of ESG and communications.

The committees monitor the proper implementation of adopted codes, bylaws and other internal regulations - including the Code of Conduct and the Anti-Corruption Code, as well as recommend and check the proper implementation of procedures (primarily regarding donations and sponsorships). The Ethics Committee may also advise employees on matters related to ethics and compliance with internal regulations.



## Communicating anti-corruption policies to stakeholders

The main means of communicating to employees and publicizing the Group's approach to ethical business conduct, including its anti-corruption policy, is through annual ethics training. For details on ethics training, please refer to the "Ethics training" section in this chapter above.

In addition, all ethical business conduct and anti-corruption policies are communicated to employees through the intranet, management meetings, onboarding training, occasional posters, etc. In this way, these policies are communicated to own employees. In addition, the Group communicates these policies to its subcontractors and suppliers, by requiring them to familiarize themselves with the Code of Conduct when signing major contracts.





# Corruption or bribery incidents

ESRS G1-4

## In brief Material topic due to double materiality study

<b>Zakres</b>	(G) Corporate governance
<b>ESRS</b>	G1 business conduct
<b>Material topic</b>	Corruption and bribes
<b>Impact description</b>	Incidents
<b>Impact assessment</b>	Positive, existing
<b>Responsibility</b>	Director of the Legal Department or Vice-President, CFO (Echo Investment S.A.) and Member of the Management Board for Compliance or Chairman of the Supervisory Board (Archicom S.A.)
<b>Scope</b>	Own employees hired under employment contracts, persons performing work for the Group under other contracts, subcontractors.

## Echo Investment Group's material topic disclosures

<b>Policy [MDR-P]</b>	<ul style="list-style-type: none"> <li>Code of Conduct</li> <li>Whistleblowing procedure</li> <li>Policy for handling whistleblowing reports</li> <li>Sustainable strategy</li> <li>Anti-corruption code</li> </ul> <p>The policy to support the monitoring and management of possible irregularities, develop employee awareness, avoid illegal activities, internal procedures and ethics, and ensure compliance with the requirements.</p>
<b>Actions and resources [MDR-A]</b>	<ul style="list-style-type: none"> <li>Ethics training</li> <li>Ethics onboarding for all new employees</li> <li>Examination of reported whistleblowing cases</li> <li>No significant financial outlay</li> </ul>
<b>Goals [MDR-T]</b>	<ul style="list-style-type: none"> <li>100 percent of own employees trained in ethics</li> <li>No incidents of corruption or bribery</li> </ul>
<b>Metrics (indicators) from ESRS [MDR-M]</b>	<p>ESRS G1-4: Confirmed incident involving corruption or bribery</p> <ul style="list-style-type: none"> <li>100 percent of own employees trained in ethics</li> <li>Number of corruption or bribery incidents reported and investigated</li> </ul>

## Countering corruption

The process the Group has put in place to ensure that conflicts of interest are avoided and managed, with clear procedures implemented for handling difficult situations - is bearing fruit. The anti-corruption policy clearly indicates what values are the foundation of the Group's operations and what conduct is required of it and its partners and stakeholders. These documents are public and available on Echo Investment's website.

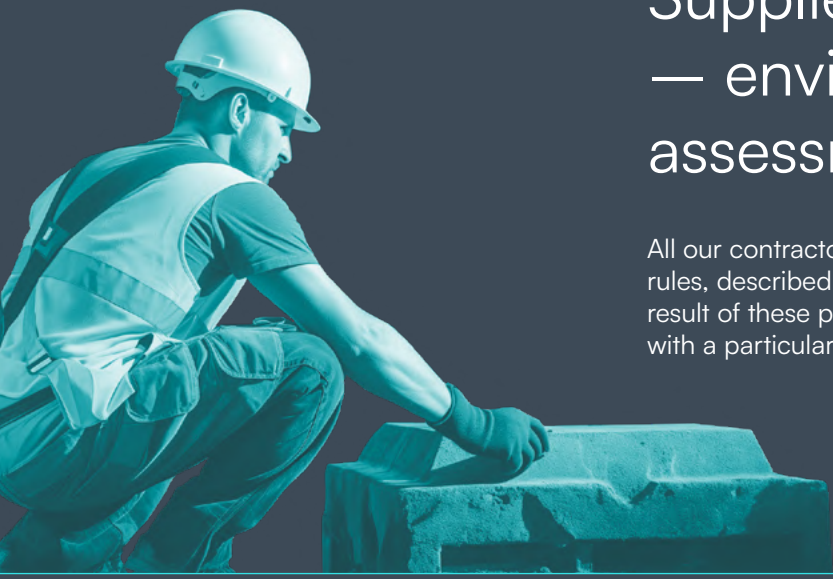
There is no acquiescence to any form of corruption in the Echo Investment Group. We implement development projects that depend on obtaining decisions from local governments and other public institutions. Each project involves the need to obtain numerous approvals and permits from local authorities and other offices. We strictly adhere to the principle that all activities should be conducted in full transparency and by duly authorized persons. Before engaging with individuals or entities that would work with public authorities on our behalf (such as architects, designers or consultants), we carefully review their reputations, business operations and affiliations.

We do not engage in any political or politician-related activities, and our contacts with local and state government authorities and officials are strictly business-related. We also do not, directly or indirectly, provide any financial or in-kind support to political causes and political organizations. In both 2022 and 2023, the value of financial or in-kind support for political causes and organizations provided by the Echo-Archicom Group amounted to PLN 0.

### Information on incidents related to violations of anti-corruption and anti-bribery laws

	2022	2023
Number of convictions involving the Group or its employees in connection with their work	0	0
Fines adjudicated (in PLN)	0	0
Number of confirmed incidents of corruption or bribery in the Group	0	1
Number of confirmed incidents that resulted in consequences against employees	0	1
Number of confirmed incidents with consequences against subcontractors, suppliers	0	0
Number of public lawsuits filed against the entity or its employees in connection with their work	0	0

The reported, investigated and confirmed case of bribery of an employee of the Group in 2023 was detected through a report under the whistleblowing system. It was analyzed and handled by the Group, in line with its procedures. It concerned our relations with subcontractors, and was not related to relations with public administration or officials. The time from reporting to closing the investigation was about 1 month. The Group does not monitor the level of satisfaction with the effectiveness of reporting mechanisms, confidence in them, or the level of satisfaction with how reports are handled. However, the whistleblowing channel system is in line with the criteria for the effectiveness of non-judicial complaint mechanisms contained in the UN Guiding Principles on Business and Human Rights (Principle 31).



# Supplier selection process — environmental and social assessment

All our contractors and suppliers are covered by uniform selection rules, described in the tendering process. Information obtained as a result of these processes has a direct impact on the decision to work with a particular supplier.

## 01

we carry out a preliminary verification on the basis of a qualification form, evaluating technical potential, organizational structure, construction experience and financial documents

## 02

we check whether a potential contractor or supplier diversifies its revenue sources and is not too dependent on bank financing

## 03

we verify certifications held for environmental protection and labor relations

## 04

we analyze contracts for compliance with health and safety and environmental regulations

## 05

we confirm compliance with principles of corporate social responsibility (CSR), check existing codes of ethics, ongoing conduct and anti-corruption programs, and analyze published reports

## 06

we examine the ethics of finances, controlling settlement of employee contributions, taxes and any possible arrears to business partners

## 07

we verify that the entity is not involved in the tax carousel procedure

## 08

we review potential reputation risks based on the Background Check procedure





05

Appendix

## Appendix no. 1

List of disclosure requirements fulfilled in the sustainability statement.

### ESRS Index - the list of disclosure requirements

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## Index of datapoints that derive from EU regulations

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Page no. in this report
ESRS 2 GOV-1 Board's gender diversity point 21 (d)	Indicator no. 13 of Table no. 1 of Annex I	Annex II to Commission Delegated Regulation (EU) 2020/181627			138
ESRS 2 GOV-1 Percentage of board members who are independent point 21 (e)			Annex II to Delegated Regulation (EU) 2020/1816		12
ESRS 2 GOV-4 Statement on due diligence point 30	Indicator no. 10 of Table no. 3 of Annex I				17
ESRS 2 SBM-1 Involvement in activities related to chemical production point 40 (d) ii	Indicator no. 4 of Table no. 1 of Annex I	Article 449a of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453 *28, Table 1: Qualitative information on environmental risks and Table 2: Qualitative information on social risks	Annex II to Delegated Regulation (EU) 2020/1816		Irrelevant
ESRS 2 SBM-1 Involvement in activities related to controversial weapons point 40 (d) iii	Indicator no. 14 of Table no. 1 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816		60
ESRS 2 SBM-1 Involvement in activities related to controversial weapons point 40 (d) iii	Indicator no. 14 of Table no. 1 of Annex I		Article 12 (1) of Delegated Regulation (EU) 2020/181829, Annex II of Delegated Regulation (EU) 2020/1816		Irrelevant
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco point 40 (d) iv			Article 12 (1) of Delegated Regulation (EU) 2020/1818, Annex II of Delegated Regulation (EU) 2020/1816		Irrelevant
ESRS E1-1 Transition plan to reach climate neutrality by 2050 point 14				Article 2 (1) of Regulation (EU) 2021/1119	56
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks point 16 (g)		Article 449a of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 1: Banking book - Climate change transition risk: credit quality of exposures by sector, issue and residual maturity	Article 12(1)(d)-(g) and 12(2) of Delegated Regulation (EU) 2020/1818		Irrelevant

ESRS E1-4 GHG emission reduction targets point 34	Indicator no. 4 of Table no. 2 of Annex I	Article 449a of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 3: Banking book - Climate change transition risk: adaptation indicators	Article 6 of Delegated Regulation (EU) 2020/1818		61
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ESRS E1-6 Gross GHG emissions intensity points 53—55	Indicator no. 3 in Table 1 of Annex I	Article 449a of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 3: Banking book - Climate change transition risk: adaptation indicators	Article 8 (1) of Delegated Regulation (EU) 2020/1818		67
ESRS E1-7 Greenhouse gas removal and carbon credits point 56				Article 2 (1) of Regulation (EU) 2021/1119	Group does not benefit from greenhouse gas removal projects (off set)
ESRS E1-9 Exposure of the portfolio to climate-related physical risks point 66			Annex II to Delegated Regulation (EU) 2020/1818, Annex II to Delegated Regulation (EU) 2020/1816		Non-mandatory
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk point 66 (a) ESRS E1-9 Location of significant assets at material physical risk point 66 (c)		Article 449a of Regulation (EU) no. 575/2013; paragraphs 46 and 47 of Commission Implementing Regulation (EU) 2022/2453; template 5: Banking book - Physical risk related to climate changes: exposures subject to physical risk			Non-mandatory

ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes point 67 (c)		Article 449a of Regulation (EU) no. 575/2013; paragraph 34 of Commission Implementing Regulation (EU) 2022/2453; template 2: Banking book - Climate change transition risk: loans secured by properties - collateral energy efficiency			Non-mandatory
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities point 69			Annex II to Delegated Regulation (EU) 2020/1818		Non-mandatory
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR (European Pollutant Release and Transfer Register Regulation emitted to air, water and soil point 28	Indicator no. 8 in Table 1 of Annex I, indicator no. 2 in Table 2 of Annex I, indicator no. 1 in Table 2 of Annex I, and indicator no. 3 in Table 2 of Annex I				Irrelevant
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ESRS E3-1 Sustainable oceans and seas point 14	Indicator no. 12 in Table 2 of Annex I				75
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The document was signed  
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