

# Sustainability Reporting of the Echo Investment Group

2024





Contents

Message from the CEO3Appendix no 1210



General disclosures5For the Planet81For People119For Stakeholders171EU Taxonomy189

ESRS 1 i 2  
General discosuress

ESRS E1  
Climate change

ESRS E3  
Water and marine resources

ESRS E4  
Biodiversity and ecosystems

ESRS E5  
Resource use and circular economy

ESRS S1  
Own employees

ESRS S2  
Value chain employees

ESRS S3  
Affected communities

ESRS S4  
Clients and end-users

ESRS G1  
Culture of ethical  
business conduct

## Message from the CEO



### Dear Stakeholders,

I am pleased to present to you the Echo Investment Group's 2024 sustainability report. In this report, we outline the actions we have taken to mitigate our environmental impact, ensure the safety and stability of our employees, clients, and building users, as well as to strengthen our corporate governance standards. We also share our goals and demonstrate the progress we have made in achieving them.

Over the past year, we have put a lot of effort into our ESG Strategy Echo-Archicom 2030. We conducted regular progress reviews, supported managers responsible for implementing various elements of the strategy, and enhanced our tools and processes for data collection. The vast majority of our strategic goals are on track or have already been achieved. In 2025, we will focus on areas that require further attention. Overall, we are satisfied with the progress we have made and remain committed to our most important objective — delivering net-zero buildings from 2030 onward.

Planet Earth is becoming an increasingly important stakeholder for many companies and organizations, including ours. Last year, we successfully reduced our Scope 1 and Scope 2 carbon footprint by 35 percent. Additionally, we calculated and disclosed our full Scope 3 carbon footprint, covering all significant CO<sub>2</sub> emission sources across our value chain. With this data in mind, we will develop and present a decarbonization strategy in 2025. This is our responsibility, as we operate in an industry that plays a crucial role in global greenhouse gas emissions.

At Echo Investment Group, sustainability also means designing and constructing buildings that are both comfortable for users and aligned with the trends of modern and resilient urban development. We focus on large-scale, mixed-use projects that provide essential infrastructure and cater to the needs of metropolitan areas. This approach is at the core of our "destination" concept — by creating places that attract people. In addition to enhancing user experience, these investments increase the resilience of cities to climate challenges, promote the use of public transportation, reduce the need for long daily commutes, create accessible green spaces, and help prevent urban sprawl. I am proud that such projects make up a significant portion of our development pipeline.

In light of ongoing global discussions about the necessity of responsible business practices, I want to assure you that Echo Investment Group remains fully committed to sustainability and the goals outlined in the ESG Strategy Echo-Archicom 2030. We will continue to care for the well-being of our Planet, the people who work for us, and the highest standards of business conduct.

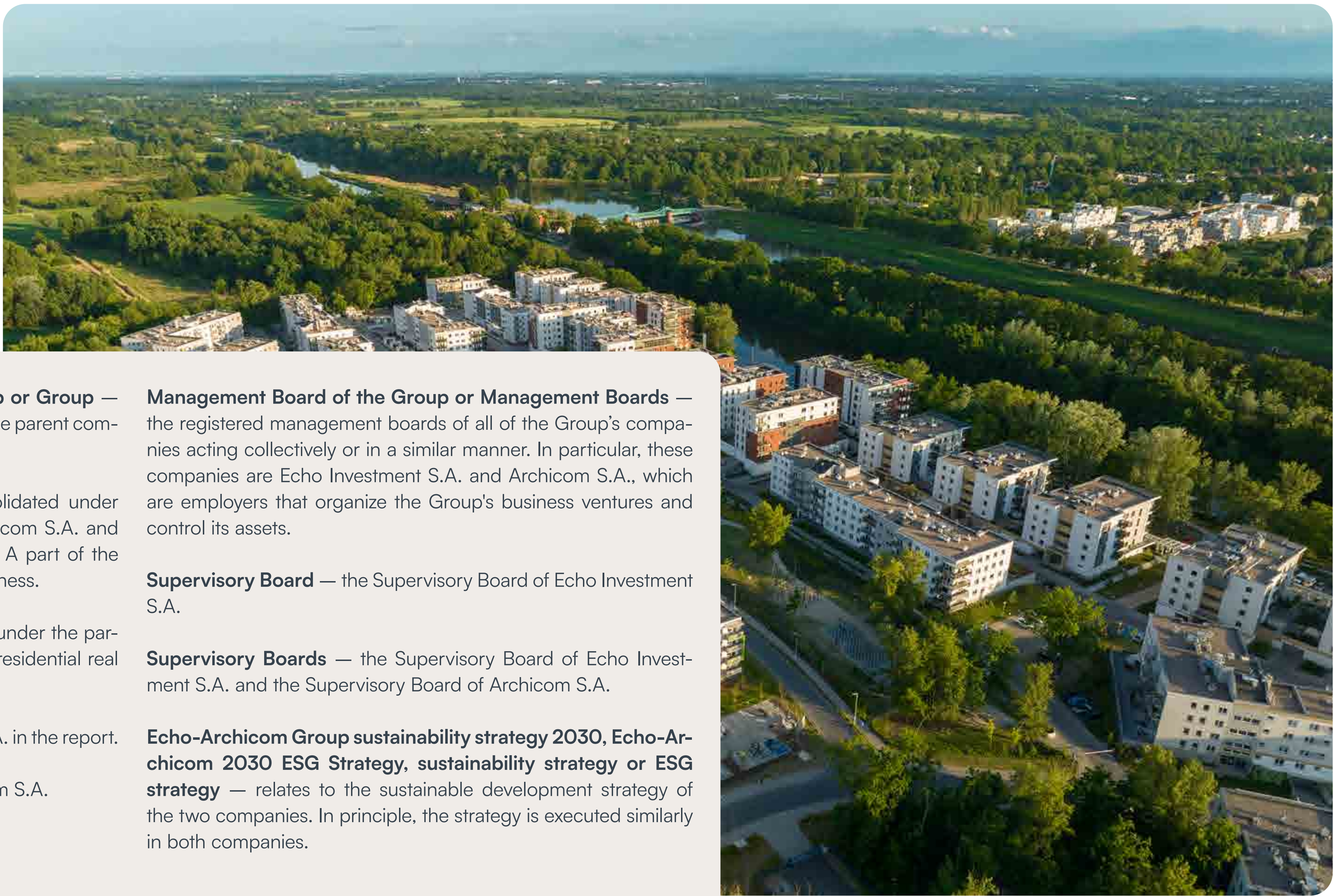
I invite you to explore our 2024 sustainability report in detail.

Sincerely,

**Nicklas Lindberg**  
**Prezes Echo Investment**



# Terms and definitions used



**Echo Investment Group, Echo-Archicom Group or Group** — all companies directly and indirectly controlled by the parent company, Echo Investment S.A.

**Echo Investment** — a part of the Group consolidated under Echo Investment S.A., with the exception of Archicom S.A. and the companies consolidated under it at all levels. A part of the Group engaged in the commercial real estate business.

**Archicom** — a group of companies consolidated under the parent company, Archicom S.A. It is engaged in the residential real estate business within the Echo Investment Group.

**Company** — the term refers to Echo Investment S.A. in the report.

**Companies** — Echo Investment S.A. and Archicom S.A.

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

**Supervisory Board** — the Supervisory Board of Echo Investment S.A.

**Supervisory Boards** — the Supervisory Board of Echo Investment S.A. and the Supervisory Board of Archicom S.A.

**Echo-Archicom Group sustainability strategy 2030, Echo-Archicom 2030 ESG Strategy, sustainability strategy or ESG strategy** — relates to the sustainable development strategy of the two companies. In principle, the strategy is executed similarly in both companies.



# 1

# General disclosures



# General disclosures

BP-1

## Basis of the report preparation

This consolidated sustainability report (a sustainability statement in the context of ESRS) applies to the Echo Investment Group, which consists of the parent company Echo Investment S.A. and its subsidiaries (directly or indirectly controlled), including Archicom S.A. along with its subsidiaries (directly or indirectly controlled). The basis for the preparation of this statement is the Accounting Act of September 29, 1994, which implements the guidelines of European Parliament and Council Directives (EU) 2022/2464, 2004/109/EC, 2006/43/EC, and 2013/34/EU concerning corporate sustainability reporting (Corporate Sustainability Reporting Directive — CSRD). This directive was transposed into national law through the Act amending the Accounting Act, the Act on Statutory Auditors, Audit Firms and Public Oversight, and certain other acts of December 6, 2024.

The preparation of this statement has been carried out in accordance with the European Sustainability Reporting Standards (ESRS). The statement forms an integral part of the Management Board's Activity Report.

The report covers the period from 1 January 2024 to 31 December 2024, which is the same period as the Group's financial year.

In certain areas, the report applies to the Group's value chain. Specifically:

- **disclosures regarding workers in the value chain (E2)** pertain to employees of construction companies who perform their work on construction sites controlled by the Group (lower tier of the value chain); and
- **selected disclosures regarding the impacts of construction projects** or activities undertaken within them are related to the operations of contractors on construction sites controlled by the Group (lower tier of the value chain). These are:
  - a) **in the area of S3** — inconveniences to affected communities related to construction activities, social communication processes for projects implemented under the special housing act (the so-called lex developer), and the management of complaints and feedback;
  - b) **in the area of E3** — water intake and wastewater discharge on construction sites and environmental safety principles;
  - c) **in the area of E4** — actual impact of construction activities on the biodiversity, environmental safety principles, and the application of guidelines for tree protection; and
  - d) **in the area of E5** — waste management on construction sites, including compliance with requirements concerning hazardous waste.

These operations are controlled, to varying degrees, by the Group; however, contractors are responsible for the execution thereof.

The report is subject to limited assurance attestation by an authorized entity selected by the Audit Committee in accordance with the Group's policy. Comparative data for 2023 and earlier years (if applicable) are not subject to assurance.

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

The Group has not made use of the opportunity to omit specific information relating to intellectual property, know-how, or innovation results, nor from the exemption from the obligation to disclose information regarding anticipated events or matters that are the subject of ongoing negotiations.





## Reporting boundaries

This report includes information regarding the entities and operations of the entire Echo Investment Group. The scope of consolidation is consistent with that of the financial statements.

The full list of consolidated entities is available in the Standalone Financial Statements of Echo Investment S.A. for 2024, published on the same date as this report.

The operational boundaries of this report have been defined based on the scope of control over the Group’s entities and operations, following the principles listed below.

### Boundaries of impact and the scope of data presented in this report

Scope	Description	Qualification
Companies fully consolidated (directly or indirectly) under Echo Investment S.A.	The vast majority of companies within the Group.	Full data presentation.
Companies jointly controlled (directly or indirectly) by Echo Investment S.A. through equity rights.	Joint-venture companies owning the Resi4Rent, Student House, Projekt Browarna Sp. z o.o., Towarowa 22, and Galeria Młociny projects.	Outside the reporting boundaries. Lack of operational control is based on the following premises; <ul style="list-style-type: none"><li>• limited ownership rights (equity participation);</li><li>• the lack of decisive representational rights (majority in management boards);</li><li>• the inability to direct operational activities; and</li><li>• the absence of contractual agreements granting the Group control over operational activities.</li></ul>
Service activities conducted by the Group for related entities.	Group companies provide services to joint-venture companies (owners of the Resi4Rent, Towarowa 22, and Galeria Młociny projects, as well as Projekt Browarna Sp. z o.o.), primarily involving investment management as a substitute investor, based on separate agreements distinct from joint-venture agreements.	The Group's impact within the value chain is accounted for at a lower tier, reflecting its responsibilities arising from these agreements (e.g., investment management).
Construction sites of projects owned by the Group, jointly controlled by the Group, or projects for which the Group acts as a substitute investor.	The Group does not exercise operational control over construction sites — this is managed by the contractors engaged by the Group under construction contracts. However, based on these contracts, the Group has influence over certain aspects, particularly in the areas of health and safety (H&S), and environmental protection.	The Group's impact within the value chain is accounted for at a lower tier, as indicated by the double materiality assessment.



## Fully Controlled Entities

These are fully included in the report. However, the Group excludes construction sites of ongoing projects from its operational boundaries, as operational control over these sites lies with the construction service providers contracted to execute the development projects. The impact of controlled construction sites is accounted for at a lower level of the value chain, in accordance with the results of the double materiality assessment.

## Jointly Controlled Investments

The Group has conducted an analysis of its jointly controlled investments, which is presented in the financial statements using the equity method. To maintain consistency in reporting, these entities have been excluded from the operational boundaries of the report. However, the impact of jointly controlled construction sites is included at a lower level of the value chain, as indicated by the double materiality assessment.

### BP-2

The Group has applied the definitions of short-term, medium-term, and long-term time horizons, as specified in ESRS 1, in this report. Estimates regarding future events are subject to uncertainty and may change.

The metrics presented in this report do not include any data related to the value chain that are based on estimates.

In this report, the Group does not present quantitative metrics or monetary values that it considers to be subject to a high degree of measurement uncertainty.

This report does not introduce significant changes in the preparation and presentation of information compared to the 2023 sustainability report. The Group strives to regularly expand the scope of analyzed and disclosed data to better align with the expectations of stakeholders and regulatory requirements.

This sustainability report is the Group's first report fully developed based on the methodology outlined by the ESRS. The Group has decided to correct errors related to the taxonomy disclosures presented in the 2023 report. The description and correction of these errors can be found in the section of this report dedicated to the EU Taxonomy (Chapter 5).

## Information disclosed based on other regulations

In this report, the Group has included information based on other regulations or generally accepted interpretations and frameworks related to sustainability reporting. A list of these topics can be found on page 215.





# About Echo Investment Group

SBM-1

Echo Investment Group is the only Polish real estate developer and investor with the most extensive experience on the major CEE market. It operates on the main segments of the real estate market: residential (through Archicom Group), office, retail and service, apartments for rent, as well as private student dormitories. It is responsible for the entire investment process related to the execution of development projects, starting from land purchase, preparing projects, and obtaining appropriate permits through the coordination of construction, marketing, leasing, management of finished buildings, and sales. Echo Investment Group also provides the above-mentioned services to related companies (e.g. Resi4Rent, StudentSpace, Towarowa 22, Galeria Młociny), and in some cases, also to unrelated investors.

The Group operates exclusively in Poland and focuses on seven major agglomerations. In 2024, there were no significant changes in this regard.

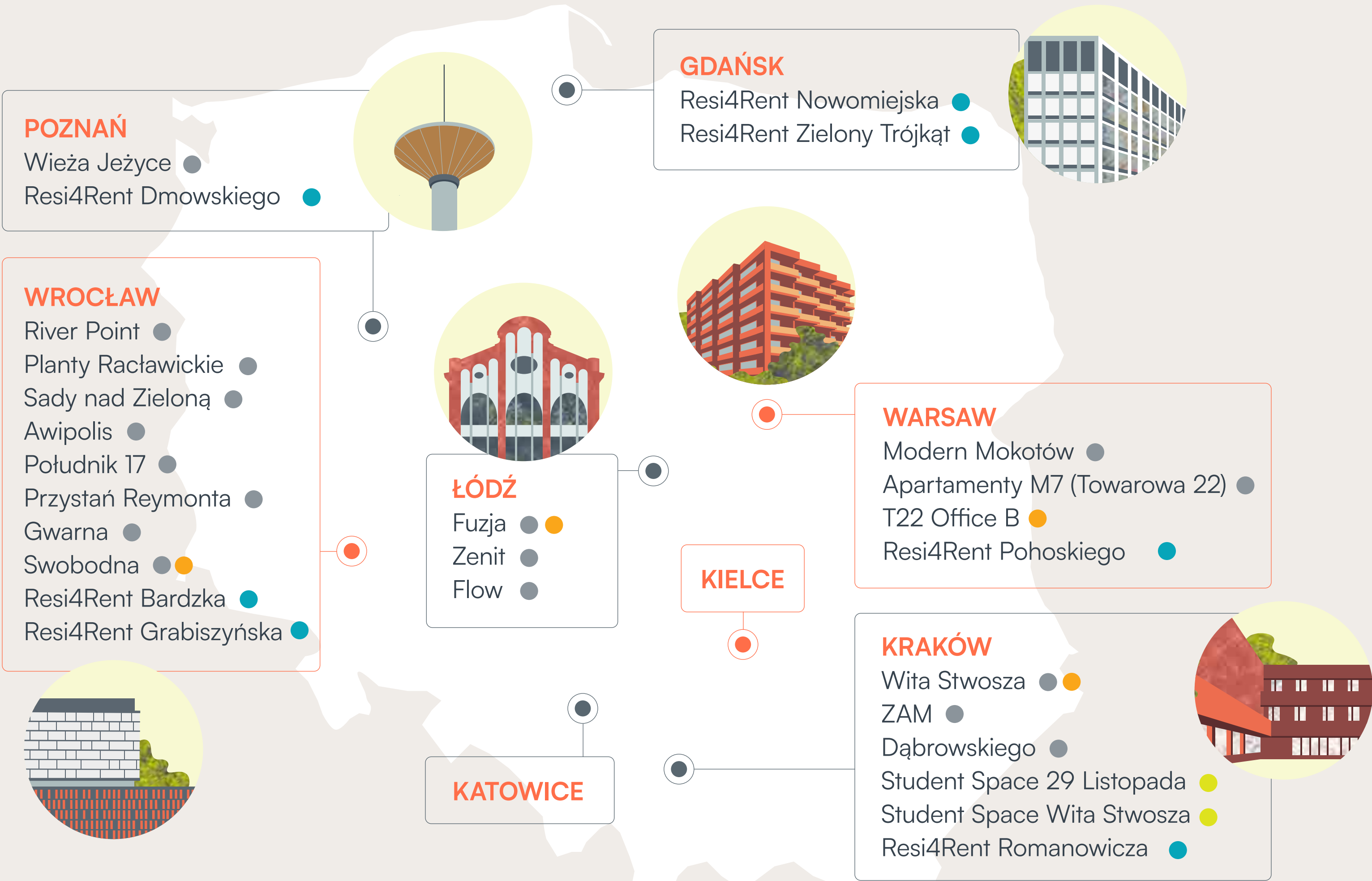
At the end of 2024, the Group employed **660 employees**.

## Projects under construction:

- Residential
- Office
- Apartments for rent
- Student housing

## Headquarters

## Agglomerations in which the Group conducts development activities:





# Business strategy

The business strategy of Echo Investment Group was developed and adopted by its Management Board and Supervisory Board in 2016. The strategic directions were confirmed in 2020, while the Group places particular emphasis on growth in the residential sector and the importance of its mixed-use, large-scale, "destination" projects.

The Management Board of the Group has not identified any future challenges, critical solutions, or sustainability projects to be implemented that would be pivotal for the execution of its business strategy.

## Pillars of business strategy

### 1. Leadership position



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 the optimal utilization of resources.

#### Impact on sustainability matters:

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

### 2. Large-scale, mixed-use “destination” projects



The Group's long-standing experience in the above-mentioned 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 purchase larger areas with lower unit prices and the competition among buyers is much lower. Combining functions allows for the faster completion of projects and comprehensive urban design.

#### Impact on sustainability matters:

Large-scale projects that combine functions have a positive impact on the shaping of urban space and on matters such as the 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.



### 3. Property development activities



The Group focuses on property development activities: purchasing plots of land, obtaining administrative permits, project preparation, obtaining financing, construction, and the rental and sale of finished projects. The Group's main source of profits comes from the sale 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 on sustainability matters:

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).

### 4. Poland



It is the most economically strong country and the largest 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 Poland'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 on sustainability matters:

No significant impact identified.

### 5. Cooperation with proven partners



The Group appreciates its 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 establishes 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 of Echo Investment S.A.

#### Impact on sustainability matters:

- The Group conducts 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 regard. Therefore, cooperation with such business partners and significant transactions are the subject of careful analyses by the Supervisory Board of Echo Investment S.A.





# Sustainable development strategy Echo-Archicom 2030



In 2023, the Echo Investment Group announced the 2030 Echo-Archicom ESG Strategy on actions in the areas of minimizing environmental impact, social responsibility, and corporate governance. It is a phased roadmap 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 Group's strategy also focuses on ensuring employees have equal development opportunities, safety, and work comfort on construction sites, as well as continuously strengthening corporate governance.

The strategy is divided into three blocks corresponding to the environment (E), society (S), and corporate governance (G) issues. All of 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 related goals, in 2025 the Group will revise its ESG strategy to adapt it to a new structure and revised tasks.

Main sustainability goals of the Group in relation to products, clients, and stakeholder relations:

Category: <b>Related to the stakeholders relations</b> / Area: <b>S — Social</b>		
2023-2030	zero fatal accidents on construction sites	Objective achieved in 2024
2023	development and implementation of a system for dealing with complaints from construction site neighbors	The system was developed in 2023 and currently is being implemented
2025	introduction of a system for measuring employee satisfaction on construction sites and setting related goals	In progress
2027	45-55% of key management roles will be filled by women and men	In progress
2026	the average number of unused holiday days at the end of the year will not exceed ten	In progress
2026	implementation of welfare facilities standards on construction sites	Objective achieved
2029	achieving a balance in pay between employees of different genders in similar positions (in terms of scope and responsibility)	In progress
2023-2030	50% of investments realized within large, multi-stage “destination” projects	Objective achieved in 2024



Category: **Related to product and clients** /  
Area: **E — Environmental**

2026	all of the Group's own offices, CitySpace offices, buildings managed by the Group and construction sites will use green energy	In progress
2030	all buildings constructed by the Group will be zero-emission	In progress
2023/2024	analysis of pilot projects (office building, rental housing building, and for-sale housing building) in terms of emission reduction and maximizing energy efficiency	Objective achieved in 2024

Category: **Related to the stakeholders relations** / Area: **G — Governance**

2023	putting ESG issues on the agenda of the Management and Supervisory Boards	Objective achieved in 2024
2023	introduction of the obligation to use four materials for internal communication regarding ethics	Objective achieved in 2024
2023-2030	100% of employees trained in regard to ethical principles	Objective achieved in 2024 94%

The goals of the Echo-Archicom Group stem from its sustainable development strategy. The Group continuously monitors the implementation of its designated objectives. In its assessment, the key strategic assumptions related to sustainability — concerning products, major markets, and customer groups — are achievable within the adopted timeframes and organizational framework. However, the achievement of certain goals may be postponed within the overall timeline set for the execution of the strategy.

**Assessment of the Group's products, services, and operating markets in the context of sustainable developme**

The Group regularly analyzes how the goals set in its 2030 sustainable development strategy impact key products, services, market activities, and business relationships. The strategy was designed to continuously improve products, service quality, and business conduct principles in areas identified as significant by stakeholders.

**Significant products and services**

The main objective of the strategy in this area is to reduce the energy intensity of constructed buildings until they achieve zero-emission operation by utilizing more efficient processes and materials, as well as continuously reducing CO<sub>2</sub> emissions through the use of renewable energy. Additionally, the Group has committed to goals related to supporting biodiversity and preventing urban

sprawl, which indirectly impacts its buildings, but primarily contributes to the sustainable development of cities. The assumptions of the sustainable development strategy are aligned with market trends and the expectations of customers and other stakeholders.

**Operational activities of the Group and business relationships**

The Group has focused on ensuring safety, stability, equal opportunities, and fair wages for its employees and collaborators, as well as utilizing green energy for its own needs. Additionally, it has set goals related to the safety and well-being of construction site workers. The assumptions of the sustainable development strategy in this area align with the policies of national governments and supranational organizations and address the needs of employees, collaborators, potential employees, and workers within the value chain.

**Operating markets**

The Group assesses that its activities related to construction and the development of large urban areas have a positive impact on their growth.

To ensure an accurate assessment of these issues, the Group has adopted specific and measurable goals, as well as interim targets (a so-called roadmap), in its sustainability strategy.



By implementing our sustainable development strategy, we contribute to the following UN Sustainable Development Goals:



**5.5** Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic, and public life.



**6.3** By 2030, improve water quality by reducing pollution, eliminate dumping, minimize the release of hazardous chemicals and materials, halve the proportion of untreated wastewater, and substantially increase recycling and safe reuse globally.

**6.4** By 2030, substantially increase water-use efficiency across all sectors and ensure the sustainable withdrawal and supply of freshwater to address water scarcity and substantially reduce the number of people suffering from water scarcity.



**7.3** By 2030, double the global rate of improvement in energy efficiency.



**8.8** Protect labor rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious situations of employment.



**11.3** By 2030, enhance inclusive and sustainable urbanization and capacity for participatory, integrated, and sustainable human settlement planning and management in all countries.

**11.7** By 2030, provide universal access to safe, inclusive, and accessible green and public spaces, in particular for women and children, older persons, and persons with disabilities.



**12.5** By 2030, substantially reduce waste generation through prevention, reduction, recycling, and reuse.

**12.6** Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle.





## Value chain

The value chain model of the Echo Investment Group was developed based on an analysis of material and financial flows. Its core component consists of operational processes (both business and support) within the Group, covering all activities from the acquisition of land plot, through procurement of construction services to the delivery of completed buildings to their new owners and users.

**The Group's own operations primarily include the following activities:**

- acquisition of investment land;
- the preparation of architectural and construction projects, or the supervision of their development;
- obtaining necessary permits and administrative decisions;
- conducting tenders and contracting construction services (in exceptional cases, also purchasing goods);
- the supervision of investment project execution, including the implementation and maintenance of health and safety standards on construction sites;
- leasing retail and office spaces;
- the management of completed commercial buildings;
- the sale of residential units; and
- the sale of completed commercial buildings.

The higher level of the value chain, known as upstream, includes all operations preceding the Group’s own operations. This encompasses the sourcing of raw materials, the production of goods, as well as the delivery thereof to the Group’s construction sites.

Additionally, it includes activities such as the procurement of water and energy by entities performing operations at the upstream level of the value chain.

The downstream level — the lower segment of the value chain — comprises everything that happens to the completed buildings constructed by the Group. This includes the use thereof by new owners and tenants, property management services, and maintenance. The final stage of the value chain is the demolition of buildings that have reached the end of their lifespan.

This structured value chain model is utilized by the Group for business model analysis, carbon footprint calculations, and assessing the resilience of the business model in the context of climate change.

**The summary of activities and business relationships presented in the table below has been developed taking into account:**

- significant activities, resources, and relationships within the Group’s own operations, such as human resources;
- significant activities, resources, and relationships within supply, marketing, and distribution networks, such as the procurement of materials and services, as well as the sale and delivery of products and services; and
- the financial, geographical, geopolitical, and regulatory environment in which the Group operates.

In 2024, no significant changes occurred in the Group’s value chain.

**Main characteristics of the value chain**

he Group's own operations require a sufficiently long and complex upstream value chain. When offering a product (apartment, building, rental space), the Group primarily depends on suitable land plots (sellers — tier 1) and the availability of contractors (construction companies providing construction and related services, including securing necessary materials and products — tier 1). At a higher level (tier 2), key entities include manufacturers of construction materials and equipment necessary for the development of buildings. In exceptional cases, these entities may also act as direct contractors for the Group (tier 1). At the highest level of the value chain (tier 3), the key entities are aggregate mines, cement plants, manufacturers of construction ceramics, and steel producers.

The entities listed above at the upstream level of the value chain have been identified due to their essential role in the Group's business operations, the scale of demand necessary to execute the Group's strategy and business model, and the limited possibility of substituting their services and products with alternatives.



Echo Investment value chain





Echo Investment value chain



HIGHER LEVEL (UPSTREAM) — Entities providing products or services

Raw material producers (tier 3)

- cement plants and building ceramics manufacturers
- aggregate mines
- steel producers
- manufacturers of construction equipment (e.g., elevators, doors, specialized building management systems, etc.)
- wood producers
- energy producers (extractive industry and energy manufacturers)
- raw material producers for construction chemicals.

Suppliers of materials and subcontractors of services (tier 2)

- suppliers of construction materials for contractors (concrete, aggregates, building ceramics, steel structural elements, thermal insulation materials, and others)
- suppliers of building equipment and components (windows, doors, elevators, specialized systems, prefabricated structural elements)
- suppliers of machinery and equipment (construction machinery, formwork, scaffolding)
- utility suppliers for contractors (including water, energy)
- manufacturers of construction chemicals

Logistics of construction equipment and materials to construction sites, waste removal from construction sites

Companies providing construction, design, and other direct services (tier 1)

- land sellers (companies and individuals)
- providers of design and planning services (architectural studios, experts)
- capital providers (banks)
- construction service providers (large and small general construction and specialized companies)
- utility suppliers for the Group (including water, energy)
- intermediaries, brokers, and providers of specialized services supporting investment projects
- suppliers of construction materials or equipment for the Group (concrete, aggregates, building ceramics, steel structural elements, thermal insulation materials, and others)





ECHO INVESTMENT GROUP

Activities directly controlled by the Group — management of the Group

Primary (business) operations

- land acquisition (1)
- planning process management (2)
- procurement and coordination of design services (3)
- contracting construction services (4)
- procurement of equipment and construction materials (4)
- financing organization (5)
- coordination and management of construction sites (6)
- apartment sales (7)
- leasing of commercial space (office, service and retail) (7)
- property management (8)
- sale of ready commercial buildings (9).

Secondary (supporting) operations

- securing financing
- accounting
- controlling
- internal audit
- legal services
- occupational health and safety (OHS)
- human resources management
- administration and management of own offices
- communication and marketing
- IT and cybersecurity



LOWER LEVEL (DOWNSTREAM)

Entities receiving products or services from the Group

Future owners and users of completed properties

- individual customers purchasing apartments
- office tenants (large and medium-sized companies, BPO and SSC sector)
- retail space tenants (retail chains, restaurants, specialty stores, and others)
- CitySpace users (small businesses, often sole proprietors, as well as medium and large companies awaiting their target office space)
- funds and other entities specializing in commercial real estate management — buyers of completed buildings (office buildings, shopping centers, rental apartments, student housing)
- users of Resi4Rent rental apartments and StudentSpace dormitories
- intermediaries and brokers acting on behalf of potential tenants or buyers
- property management companies and other service providers for buildings (operating on behalf of subsequent building owners)

End of the building's lifecycle

- specialized companies handling demolitions, segregation of demolition waste, and its disposal



The main entities in the lower level of the value chain are the Group’s customers, such as:

- individual customers purchasing apartments from Archicom;
- funds purchasing completed commercial buildings from Echo Investment (mainly international real estate funds); and
- tenants of commercial spaces (leasing a commercial building is a prerequisite for its sale).

In developing the value chain, the Group identified geographical areas and resource dependencies at a high level of generalization. It focused on Poland, where its operations are conducted and where its closest, key business relationships are concentrated. The Group considered dependencies on resources and ecosystem services, including raw materials for construction material production, access to water, and land availability.

Geographical scope of value chain elements

Upstream level	
Raw material producers (tier 3)	The main raw materials (aggregates) come from Poland, while other components originate from international markets.
Suppliers of materials, subcontractors of services (tier 2)	The vast majority are Polish companies, which are (to varying degrees) dependent on international markets.
Construction companies (tier 1)	Poland

Downstream level	
Customers purchasing apartments	The vast majority are Polish citizens or residents
Buyers of completed commercial buildings	International funds from around the world
Tenants of commercial buildings	Companies of various sizes (from small to large), origins (Polish and foreign), and industries (all)

Dependency on resources

**Natural resources:** aggregates, iron ore (essential for the production of basic construction materials), water (necessary for construction processes), and land plots. Resources at the upstream level of the value chain (tier 3).

**Human resources:** adequately qualified engineering staff and construction site workers. Resources at the upstream level of the value chain (tier 1) and within the Group’s own operations.

**Technological resources:** technology necessary for the production of materials and the construction of buildings. Resources in the upstream value chain (tiers 2 and 1).

**Capital resources:** financial resources necessary for purchasing and financing the construction process. Upstream level of the value chain — banks (tier 1), own operations, downstream level of the value chain — customers and funds purchasing completed commercial buildings.

In sustainability reporting, the Group primarily considers its own operations, followed by processes and operations within the value creation chain that have the greatest impact on the Group's material topics and those over which the Group has the most significant and direct influence. Each year, the scope of analyzed and reported topics is expanded. Additional topics for analysis and reporting are selected based on the criterion of the highest estimated impact of these topics on the Group's business and the greatest ability of the Group to influence them.



# Business model

The Group's business model is based on the 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 to maximize operations in the most promising ones.

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 designs, and manage construction. While construction is still underway, we conduct marketing activities, sell apartments, and lease commercial properties. After the completion of construction, office buildings and shopping centers are actively managed by the Group to achieve maximum value, and then to be sold. A growing part of the Group's operations is the execution of projects for joint venture partners, which serves as an additional source of revenue (development fees). We use the profits earned in this way for regular dividend payments and further developments.

## Key inputs of the Group identified in the business model

### → Knowledge, skills, and experience of employees

The Group considers these as its key assets, enabling it to conduct business operations with a high level of professionalism. The Group invests in employee development, including training programs, aligned with current business priorities. A detailed description of the approach to employees and other individuals working for the Group is provided in the S1 disclosures.

### → Financial capital

The Group maintains a high level of financial liquidity, allowing it to meet all of its obligations, acquire land for new projects (including responding to market opportunities), explore and enter new business segments, and pay dividends. The Management Boards and Supervisory Boards of Echo Investment

and Archicom regularly monitor liquidity through scenario analyses. Both companies maintain strong relationships with the capital market, ensuring access to financing for ongoing projects and, if necessary, for its daily operations.

### → Assets — primarily land designated for development

The Group continuously maintains a land bank, ensuring the ability to conduct development activities for the next 4-5 years. It also collaborates with other entities, allowing it to maximize its expertise while mitigating risks.

### → Social capital

The Group upholds its reputation by adhering to all legal, social, and ethical standards, and providing professional communication channels for its stakeholders.

## Key components of the Group’s outputs and outcomes identified in the Group’s business model

Outputs, as the short-term results of the Group's operations, serve as a key performance indicator primarily for shareholders, as their main measure is generated profit and dividend distribution.

The Group's outcomes reflect its potential for long-term value creation, particularly its ability to sustain operations and achieve long-term growth. In this category, the most critical elements

include financial capital (physical and financial assets that serve as a foundation for growth), intellectual capital (the knowledge, experience, and skills of employees, developed according to the Group’s needs), and organizational and production capital (primarily the land bank maintained at a level ensuring operations for the next 4-5 years without the immediate need for replenishment). Social capital also plays a crucial role, encompassing the trust of customers, banks, employees, and other stakeholders.



# Value creation model

## Input

### FINANCIAL CAPITAL

- **PLN 2 billion of equity**
- **PLN 814 million of cash**
- acquired external financing (loans and bonds)

### HUMAN AND INTELLECTUAL CAPITAL

- own employees
- individuals providing services to the Group
- work of external experts
- internal management, control, IT systems, and others

### ORGANIZATIONAL AND PRODUCTION CAPITAL

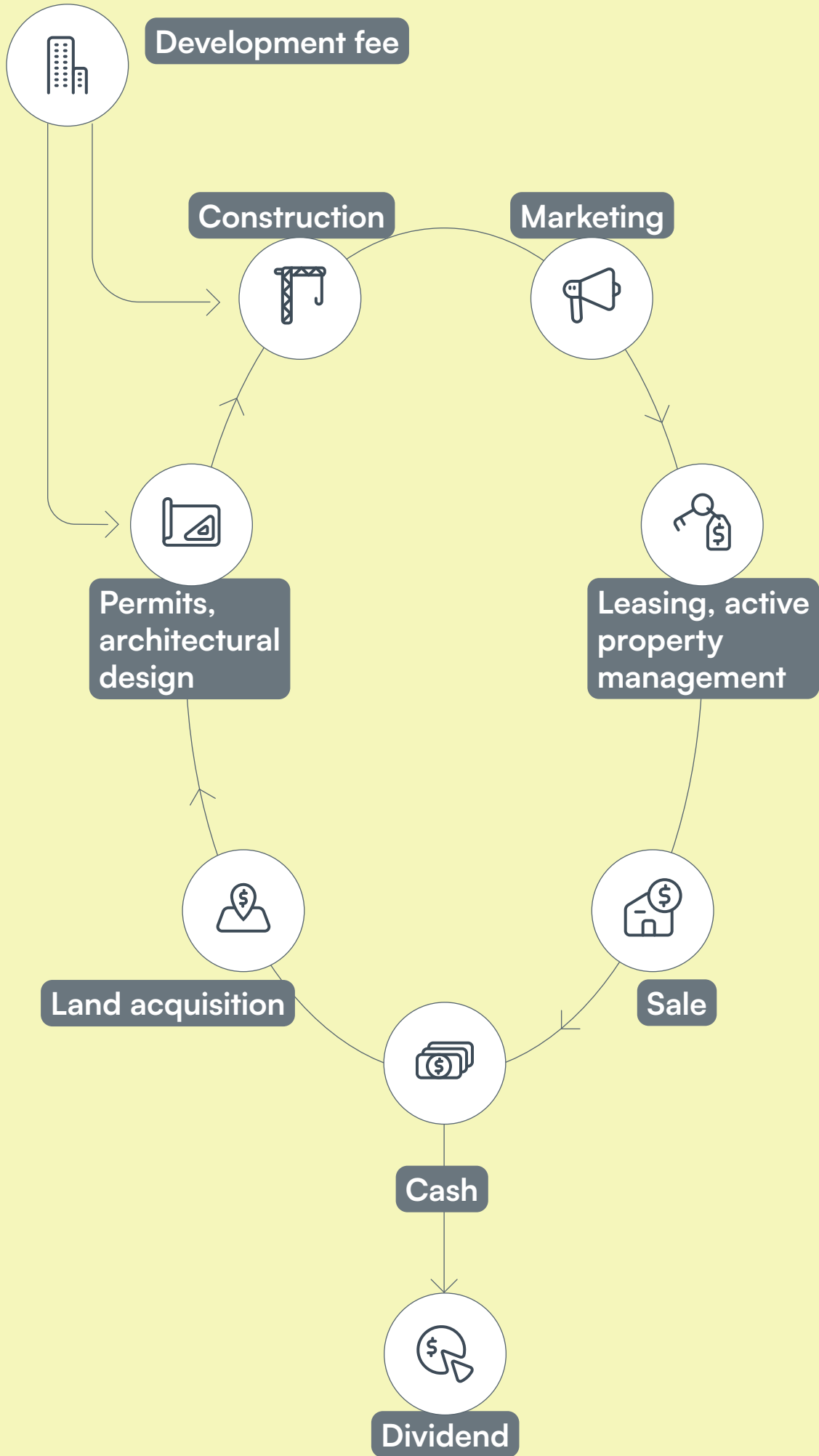
- **PLN 6 billion of assets**
- purchased services (design, construction)
- acquired investment land
- processes and procedures

### SOCIAL CAPITAL

- customer and contractor trust
- cooperation with shareholders and banks
- employee loyalty
- compliance with legal requirements

Input refers to the resources the Group has utilized to create value (including the state of assets and liabilities as of the end of 2023).

## Business model



## Output

### FINANCIAL RESULTS

- **PLN 15.6 million** — net profit
- **PLN 366.2 million** — cash
- **PLN 6.7 billion** — Group's asset value

### OPERATING RESULTS

- **2,196 sold apartments**
- **1,076 apartments** handed over to clients
- **6 buildings** with **1,691** residential units for rent handed over to Resi4Rent
- **EUR 32.5 million** — achieved sales value of the React office building in Łódź
- **1,600 mkw.** — increase in office space managed by CitySpace
- increase in the value of the Group's individual commercial properties

Output represents the direct results of the Group's activities in 2024.

## Impact

### UZYSK

- increase in the Group's value on the Stock Exchange

### HUMAN AND INTELLECTUAL CAPITAL

- increase in employees' qualifications and knowledge
- improvement in employee loyalty and satisfaction
- enhancement of the efficiency and quality of internal management systems

### ORGANIZATIONAL AND PRODUCTION CAPITAL

- acquired and secured in 2024 properties for **4,954** apartments
- acquired contractors
- increase in the Group's potential to create value in the future

### SOCIAL CAPITAL

- acquired clients
- increase in trust and understanding from customers and contractors
- no significant financial penalties

Impact is the long-term value or change resulting from the Group's actions and business model.



# Group's business segments

The Echo Investment Group is a property development group with extensive experience in the main sectors of the real estate market: residential, office, and retail/ service. The Group has unique skills and the ability to develop large, mixed-use and city-forming "destination" projects — places that are good for living, working, and leisure. We create projects that fit into the urban fabric and complement it.



## Apartments for sale

### CLIENTS

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

### 2024 SUMMARY

**1,076**  
apartments handed  
over to clients

**2,196**  
apartments sold

**4,836**  
apartments under  
construction

**8,970**  
apartments in preparation



## Office buildings



### CLIENTS

This offer is for two types of clients:

1. Companies looking for a place for their offices, usually large and medium-sized companies, both Polish and with foreign capital. A large section of them are companies from the BPO/SSC sector.
2. Large investment funds that purchase finished and leased office buildings in order to earn from the lease thereof as well as the increase in their value.

### 2024 SUMMARY

**98,900 sqm**

space of ready office  
buildings under management

**32.5 mln EUR**

value of the sale transaction of  
the React office building in Łódź



## Flex, serviced offices



### CLIENTS

Serviced offices are used by the following types of clients:

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

### 2024 SUMMARY

**4,324**

total number of workstations  
in CitySpace offices

**12**

number of CitySpace  
locations

**30,500 sqm**

total space

**1**

new location

**599**

number of workstations prepared in 2024





## Shopping centers and retail spaces

### CLIENTS

This offer is for two types of 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 the lease thereof and increase in value — a profile similar to the buyers of office buildings.

### 2024 SUMMARY

**+1%**

Katowice’s Libero shopping center turnover increase compared to 2023

**-7%**

footfall decrease



## Services

### CLIENTS

The Group provides its clients with services such as investor substitution, construction management, consulting, accounting, marketing, etc.

Primarily related parties (Towarowa 22, Galeria Młociny, Resi4Rent, StudentSpace), and in rare cases, third-party entities.

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

In 2024, there were no significant changes in the Group's products, services or client categories.





# The Group's sales revenue broken down by sectors

The Group's sales revenue broken down by significant sectors ESRS in 2024 [PLN thousand]	
Total amount of revenue	1,083,405
Revenue amount — 68.10.Z PKD (M.68.11 according to NACE) — buying and selling of own real estate (sale of flats)	746,820
Revenue amount — 41.10.Z PKD (M.68.12 according to NACE) — activities related to the implementation of construction projects (project management services, finishing of offices, commercial, and service spaces)	125,980
Revenue amount — 68.20.Z PKD (M.68.20 according to NACE) — rental and management of own or leased real estate (rental of residential, office, commercial, and other space)	197,360
Amount of other (unclassified) income	13,244

In the Group’s business analysis and financial reporting, the Group does not use classifications based on PKD (NACE) codes, but rather follows the division into business segments.

Revenue from sales and costs of the Group by business segments in 2024 [PLN thousand]	Revenue	Costs*
Total	1,083,405	718,167
Residential	747,006	489,732
Resi4Rent	39,096	16,908
Student Space	39,094	26,414
Commercial properties	258,236	185,113

\*Cost of sales, profit (loss) from investment properties, administrative costs related to project execution, sales costs, general and administrative costs, other net operating costs.

The Group does not conduct any activities related to the fossil fuel sector, chemical production, weapons, or the cultivation or production of tobacco.

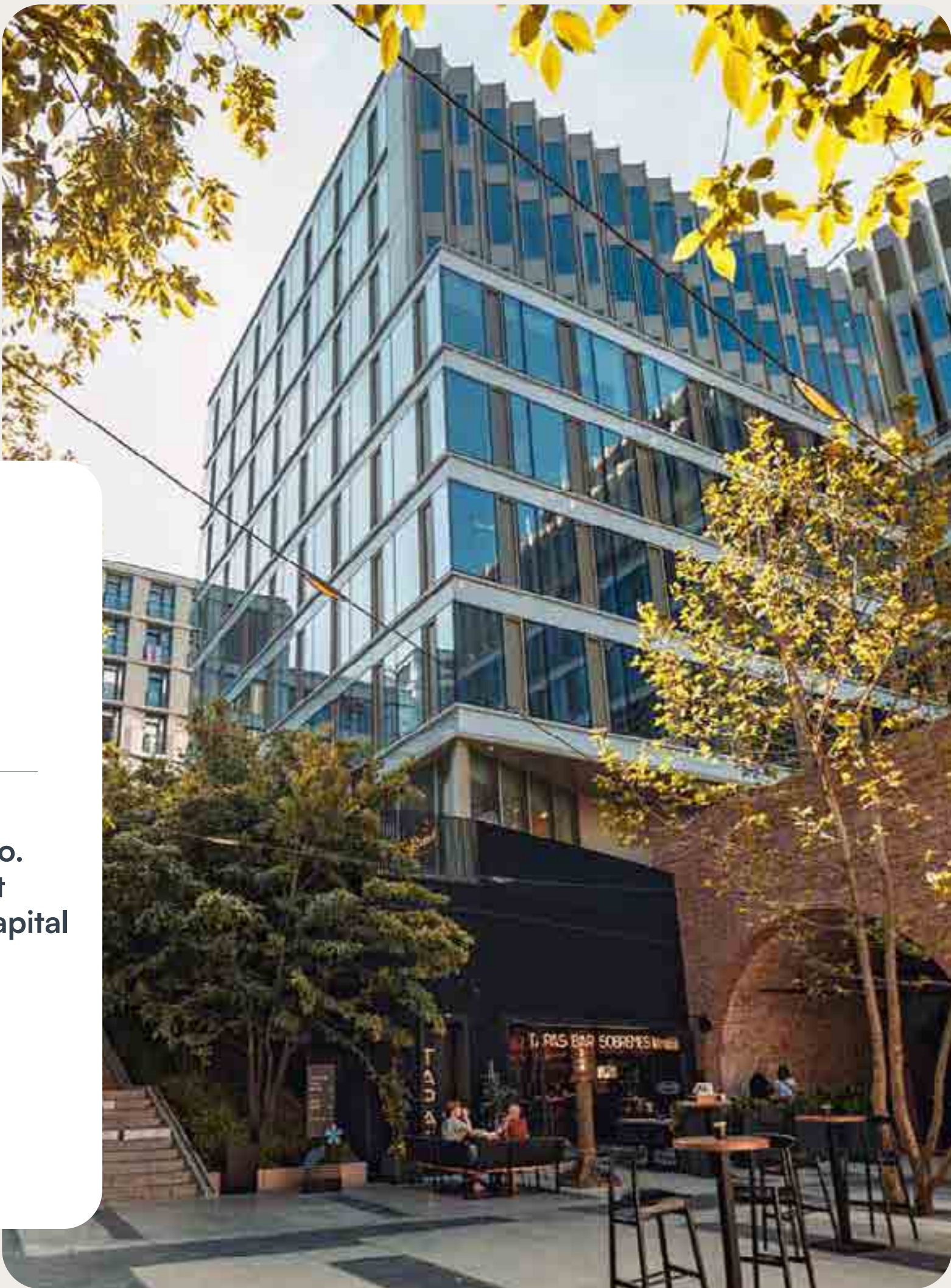


# Management of the Group and sustainability matters

GOV-1

## Ownership, supervisory, and management bodies of Echo Investment S.A.

Echo Investment S.A. is the parent company, consolidating the entire Group. The main shareholder of the Company is Lisala Sp. z o.o., an entity controlled by the Hungarian company Wing IHC Zrt. The ultimate beneficial owner of the Company is Tibor Veres.



### Echo Investment S.A. shareholders structure as at 31 December 2024

11.5%

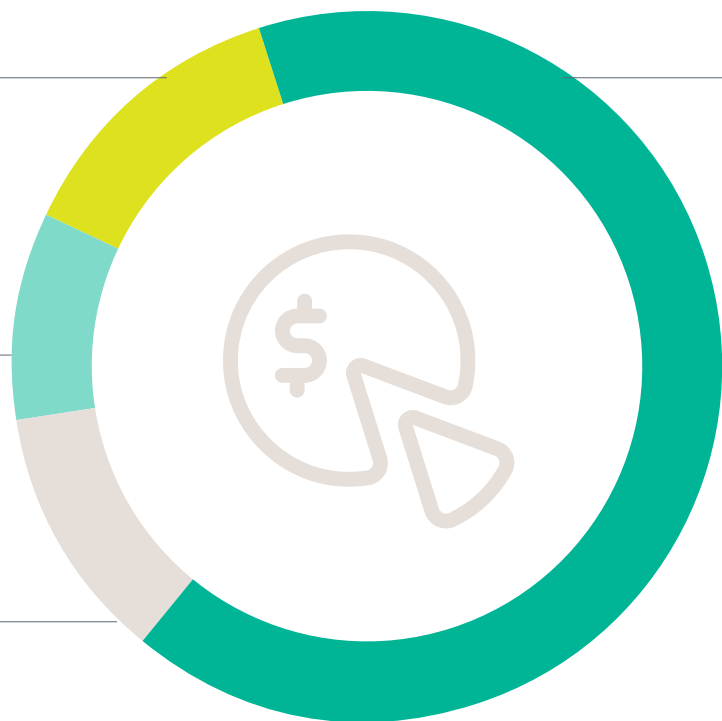
Nationale-Nederlanden  
OFE

9.6%

PTE Allianz  
Poland

12.9%

Others



66.0%

Lisala Sp. z o.o.  
(Wing IHC Zrt  
and Griffin Capital  
Partners)

## General Meeting of Shareholders

The highest governing body of the parent company Echo Investment S.A. is the General Meeting of Shareholders. It enables all shareholders to exercise their rights to direct its activities.

The General Meeting of Shareholders holds key powers, particularly including:

- the approval of annual reports,
- the granting of discharge to Management Board members for the performance of their duties,
- taking decisions on dividend,
- other rights granted directly by the Commercial Companies Code or the Company's Articles of Association.

Shareholders and the Company may propose resolutions for adoption by the General Meeting of Shareholders during its proceedings. Shareholders may also request the Company to provide information on a specific topic, even outside the General Meeting. Such a request may include topics related to corporate governance processes, control, and procedures used to monitor impacts, risks, and opportunities, as well as their management and oversight.

In 2024, one Ordinary General Meeting of Shareholders was held. It did not make any decisions or review any matters related to the Group's sustainability issues.



## Supervisory Board

The Supervisory Board serves as the non-executive body.

### The Supervisory Board's Powers

- determination of the Supervisory Board bylaws and approval of the Management Board bylaws,
- assessment as to whether individual members of the Supervisory Board meet the independence criteria,
- preparation of reports on remuneration received by members of the Management Board and members of the Supervisory Board,
- examine the Company's financial statements for the last financial year,
- examine the Company's Management Report and suggestions of the Management Board regarding the distribution of profit and the coverage of loss,
- express opinions on motions submitted by the Management Board directed to the General Meeting, and express opinion and pass resolutions on other issues submitted by the Company's Management Board,
- appoint, dismiss and suspend the Company's Management Board or its individual members,
- appoint or change of an auditor Company,
- request from the Management Board information specified in the Commercial Companies Code

In addition to the issues reserved by the Commercial Companies Code, the prior consent of the Supervisory Board is required for:

- giving its consent to incurring liabilities and disposing of rights as regards issues included in the Company's current operations, if their value exceeds 20 percent of the Company's equity,
- approve the contracting of liabilities and disposing of the rights to the extent within the current business of the Company, if their value exceeds 10 percent of the Company's equity,
- payment to shareholders of an advance on the expected dividends proposed in the resolution of the Management Board,
- adoption of the annual budget and business plan for the Company and its subsidiaries prepared by the Board.





The composition of the Supervisory Board, professional biographies of its members, along with their expertise, experience, and skills in managing sustainability issues



Noah M. Steinberg  
Chairman of the Supervisory Board

Noah M. Steinberg is the Chairman and Chief Executive Officer of the Wing Group, as well as the Chairman of the Supervisory Board at Echo Investment in Poland and Bauwert in Germany. Since the founding of the Wing Group in 1999, Noah Steinberg has led the company as Chairman and CEO, and he is responsible for the management of the entire group across all of its asset classes and geographies.

He graduated from Princeton University (the Woodrow Wilson School of Public and International Affairs, Princeton University) with a BA, and from the Diplomatic Academy of Vienna with an MA. He speaks English, Hungarian, French, German, and Spanish.

Knowledge, experience, and skills related to managing sustainable development issues:

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

Scope of training to obtain a certificate of “ESG training for Supervisory Boards and Teams”:

- the role of ESG as a business standard;
- the business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector; and
- the role of Boards and Supervisory Boards in managing ESG transformation.



Tibor Veres  
Vice-Chairman of the Supervisory Board

Tibor Veres has graduated from Moscow State University as an economist in 1986. He established the Wallis Group in 1989, where he continues to be the Principal Owner and Chairman. Over the course of the past 35 years, the Wallis Group has developed a prominent regional position in a number of commercial and industrial areas thanks to its domestic and international activities.

In his career as an entrepreneur, executive, and investor, Tibor Veres has participated in the foundation as well as the success of a number of renowned companies. Such successful companies include, among others, the Wing Group, Praktiker, Graboplast, Pannon GSM, Milton

Bank, Market Zrt., Index, Danubius Rádió, as well as AutoWallis and Alteo, both of which are listed in the Prime Category on the Budapest Stock Exchange. He is currently a Member of the Board of Directors at the Wing Group and Graboplast, and of the Board of Trustees of the Hungarian UNICEF.

Knowledge, experience, and skills related to managing sustainable development issues:

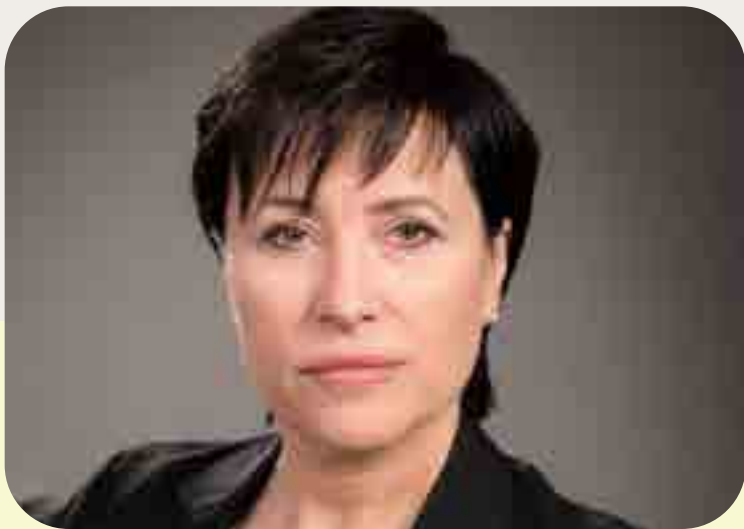
- corporate governance;
- corporate impact management;
- risk management;
- supply chain management (value chain creation);
- environmental protection.

Scope of training to obtain a certificate of “ESG training for Supervisory Boards and Teams”:

- the role of ESG as a business standard;
- the business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector;
- the role of Boards and Supervisory Boards in managing ESG transformation



**The composition of the Supervisory Board, professional biographies of its members, along with their expertise, experience, and skills in managing sustainability issues**



**Margaret Dezse**  
Independent Member of the  
Supervisory Board

Margaret Dezse is a former partner of Ernst & Young (EY) and PwC, having spent a total of 35 years at these firms of which she was a partner for 21 years in transactions advisory and corporate finance. After graduating from the University of Alberta with a Bachelor of Commerce and earning her Canadian CPA designation, Margaret started out as an auditor in her home country of Canada. After moving to Hungary in 1989, her career quickly evolved from audits into privatization and corporate finance. For more than 30 years, she has advised on hundreds of transactions and has assisted clients from a variety of industries on strategic and investment decision making.

In addition to leading the corporate finance and transactions advisory teams in Hungary, Margaret has held different regional leadership roles in the CEE region. She is presently serving as an Independent Member of the Board of Directors and Chair of the Audit Committee of Masterplast Nyrt, an Independent Board Member of Kometa Zrt, an Independent Member of the Supervisory Board and Chair of the Audit Committee of CIB Bank (Intesa San Paolo Group), as well as a Member of the Independent Oversight Advisory Committee (IOAC) for the UN World Food Programme (WFP). Margaret was also a Supervisory Board Member of the social-impact oriented venture capital fund Impact Ventures and for United Way Hungary.

**Knowledge, experience, and skills related to managing sustainable development issues:**

- corporate governance: involved in assessing competence and filling key directorships and partner candidates; establishing remuneration policies, promoting and supporting corporate values, codes of conduct, as well as processes for anti-corruption, independence assessment, and

- conflict of interest assessment;
- risk management: risk assessment and mitigation, support in preparing and implementing policies, and promoting corporate culture. She has also been engaged in this area as a member of the management boards of various companies;
- human resource management: participated in personnel decisions, and built organizational structures, taking into account, among other things, aspects of diversity, equal working conditions, and remuneration structures. She is a certified coach at EY, as well as a mentor for the CPA Career Development Mentorship program in Alberta, Canada; and
- supply chain management: in 2024, she participated in a presentation for members of CPA Canada called Connecting ESG Reporting Standards with the Reality of Supply Chains".

**Scope of training to obtain a certificate of “ESG training for Supervisory Boards and Teams”:**

- the role of ESG as business standard;
- the business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector;
- the role of Boards and Supervisory Boards in managing ESG transformation.



The composition of the Supervisory Board, professional biographies of its members, along with their expertise, experience, and skills in managing sustainability issues



**Maciej Dyjas**  
Member of the Supervisory Board

Maciej Dyjas is a Co-owner and Managing Partner of Griffin Capital Partners.

His career began in consulting companies affiliated with Hewlett Packard in Germany and the US. He then became a co-investor and Partner, and subsequently Managing Partner and CEO at Eastbridge Group, an evergreen investment vehicle, founded and owned by the Bruckner family. Together with his roles at Eastbridge, he held several executive and non-executive board positions in companies controlled by the Group, including posts such as CEO of EMF, listed on the WSE, and CEO of DTH Capital in New York. By the time he departed from Eastbridge Group in 2014, the company held assets of over USD 3

billion in the retail and e-commerce, consumer goods, and real estate sectors in CEE, the EU, and the US.

He obtained a Master’s degree in Mathematics and Computer Science from the University of Warsaw, and subsequently pursued studies in business and psychology of management and communication in Stuttgart and Frankfurt.

**Knowledge, experience, and skills related to managing sustainable development issues:**

- corporate governance: comprehensive knowledge of corporate governance principles, which are also necessary in the context of ESG management. Expertise related to the roles and responsibilities of management boards, committees, and top management;

- risk management: experience in transactions, he has detailed knowledge of risk management, with a particular focus on identifying and advising on risks;
- human resource management: he has played a key role in hiring and building teams.

**Scope of training to obtain a certificate of “ESG training for Supervisory Boards and Teams”:**

- the role of ESG as a business standard;
- the business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector;
- the role of Boards and Supervisory Boards in managing ESG transformation.



**Sławomir Jędrzejczyk**  
Independent Member of the Supervisory Board

Sławomir Jędrzejczyk has more than 25 years of experience working for Warsaw Stock Exchange-listed companies.

From 2008-2017, he was the Vice Chairman and CFO of PKN Orlen S.A., as well as the Vice Chairman of the Supervisory Board of Unipetrol a.s., a Member of the Management Board of Orlen Lietuva, and a Member of the Board of Directors of Orlen Upstream Canada. His main responsibilities included the implementation of strategies related to increasing value, building capital market relations, providing financing, and increasing cash flows through operating excellence, divestments, and projects aimed at improving working



**The composition of the Supervisory Board, professional biographies of its members, along with their expertise, experience, and skills in managing sustainability issues**

capital levels. He has also been responsible for planning and reporting, business controlling, accounting, supply chain management, investor relations, M&A, and IT. Sławomir has previously held the position of CEO of Emitel. He has also been employed by Telekomunikacja Polska, ORFE, Impexmetal, and PwC.

He graduated from the London Business School (Senior Executive Programme) and the Łódź University of Technology’s Faculty of Electronics, and is also a Member of the Association of Chartered Certified Accountants (ACCA).

**Knowledge, experience, and skills related to managing sustainable development issues:**

- corporate governance: the 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, as well as analyst and shareholder relations, organizing project standards and quality, and improving the efficiency of business operations;
- supply chain management (value chain management).

**Scope of training to obtain a certificate of “ESG training for Supervisory Boards and Teams”:**

- the role of ESG as a business standard;
- the business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector;
- the role of Boards and Supervisory Boards in managing ESG transformation.



**Péter Kocsis**  
Member of the Supervisory Board

Péter Kocsis is the Wing Group’s Deputy Chief Executive Officer. He is also the Head of Corporate Finance at Bauwert Aktiengesellschaft, and a Board Member of Hungary-based NEO Property Services.

He is an experienced real estate professional with a demonstrated history of working in the real estate industry. Skilled in business planning, asset management, negotiation and talent management and in digitalization as well as in ESG transition. Prior to his current positions, Péter was the Managing Director at UniCredit Bank Hungary (ex-HVB) from 1997-2006.

Péter graduated from Corvinus University Budapest with an MA and subsequently completed postgraduate degrees at the University of Birmingham (MIS) and Georgetown University (MSFS).

**Knowledge, experience, and skills related to managing sustainable development issues:**

- corporate governance;
- risk management;
- Human resource management (including: diversity and inclusion);
- environmental protection.

**Scope of training to obtain a certificate of “ESG training for Supervisory Boards and Teams”:**

- the role of ESG as a business standard;
- the business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector;
- the role of Boards and Supervisory Boards in managing ESG transformation.



**The composition of the Supervisory Board, professional biographies of its members, along with their expertise, experience, and skills in managing sustainability issues**



**Bence Sass**  
Member of the Supervisory Board

Bence Sass is a senior real estate professional with more than 20 years of experience in commercial real estate.

As a Vice CEO at Wing Group, he manages the team responsible for international business development and investment transactions. He is also a member of the Supervisory Board of Bauwert Aktiengesellschaft and Wing International. To date, he has been involved in transactions with an aggregate volume well exceeding EUR 1 billion. Prior to his current employment, he was a member of the UniCredit Bank’s leading real estate finance team.

Bence graduated with a BA from the Budapest Business School and an MBA from the Budapest University of Technology and Economics. He is a member of the Royal Institution of Chartered Surveyors (RICS).

**Knowledge, experience, and skills related to managing sustainable development issues:**

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

**Scope of training to obtain a certificate of “ESG training for Supervisory Boards and Teams”:**

- the role of ESG as a business standard;
- the business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector;
- the role of Boards and Supervisory Boards in managing ESG transformation



**Nebil Şenman**  
Member of the Supervisory Board

Nebil Senman is a Co-Owner and Managing Partner of Griffin Capital Partners. Before joining Griffin in 2014, he held senior roles at Oaktree’s private equity and real estate funds, in which he initiated and oversaw investments and operations worth several billion Euros in Europe with a focus on Germany and Poland. Prior to Oaktree, he spent eight years at Ernst & Young Real Estate (formerly Arthur Andersen) and held various managerial positions in real estate and corporate finance advisory services.

Nebil is a graduate of universities in Berlin (TU Berlin, EBS), Paris (ESCP Europe), and London (LSE), and holds an MBA and Master’s Degree in Civil Engineering. He also holds a post-graduate

diploma in real estate management (EBS) and is a Chartered Member of the Royal Institution of Chartered Surveyors, MRICS.

**Knowledge, experience, and skills related to managing sustainable development issues:**

- corporate governance: having an in-depth understanding of regulations and industry best practices helps him to make strategic decisions to create long-term value;
- sustainable finance: his experience allows him to play a key role in ensuring that the operations of companies are in line with the highest ethical standards and sustainable development;
- corporate impact management: he has specialized in building strong relationships with various stakeholders, from shareholders to regulators, promoting the transparency and accountability of companies;
- human resource management: as a member of various supervisory boards, he evaluates key managers and directors. He has played a key role in hiring a significant number of highly qualified professionals.



Scope of training to obtain a certificate of “ESG training for Supervisory Boards and Teams”:

- the role of ESG as a business standard;
- the business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector;
- the role of Boards and Supervisory Boards in managing ESG transformation.

There are no committees nor designated individuals within the Supervisory Board responsible for overseeing impacts, risks, and opportunities related to sustainability. Selected tasks from the scope described above, however, are carried out by the Audit Committee, which consists of the following members:

- **Margaret Dezse — Chair,**
- **Sławomir Jędrzejczyk,**
- **Nebil Şenman.**

The responsibilities of the Audit Committee include, among others, evaluating the risk management system, the effectiveness of the internal control system, and compliance management. The Audit Committee fulfills its duties with the support and cooperation of the Company - primarily working with the Management Board, Director of Internal Audit, Finance Director, business controlling, other employees, and Group experts.

Oversight of the Audit Committee's activities in the area of sustainability is exercised by the Supervisory Board (through the ability to make changes to the composition of the Audit Committee) and by the General Meeting of Shareholders (through the ability to appoint or dismiss members of the Supervisory Board and to grant or withhold discharge for the performance of their duties).

Audit Committee meetings are typically convened four times a year but may also be called on an ad hoc basis to address specific matters.

Echo Investment S.A. Supervisory Board diversity by dependency - as of 31 December 2024 [in percents]

	Number	Share
Dependent	6	75%
Independent*	2	25%
Other (e.g., employee representative)	-	-
Total	8	100%

\* independence from the Group and the Group's related parties was established in accordance with Article 129(3) of the Act on Statutory Auditors and the adopted independence criteria set out in the Audit Committee Regulations.

Echo Investment S.A. Supervisory Board gender diversity as of 31 December 2024 [in percents]

	Number	Share
Women	1	12.5%
Men	7	87.5%
Total	8	100%

The Group did not reveal any cases of gender non-reporting or people identifying with a gender other than male or female. .

Echo Investment S.A. Supervisory Board diversity of nationality as of 31 December 2024 [in percents]

	Number	Share
Hungarian	3	37.5%
Polish	2	25%
American	1	12.5%
Canadian	1	12.5%
German	1	12.5%
Total	8	100%



## Group's Management Board

The Group is managed by the Management Board of the parent company, Echo Investment S.A., which consolidates the entire Group in its financial reporting. Nevertheless, since the capital groups of the two main companies, Echo Investment S.A. and Archicom S.A., carry out development activities in different sectors of the real estate market, have distinct clients, and a different way of developing projects and financing them, the Management Boards of Echo Investment S.A. and Archicom S.A., in most cases, act as the management boards for sister companies, or the equivalent thereof, and cooperate with each other in specific business situations.

The business functions of the two groups (land purchasing, contracting and optimization, managing architectural departments, managing business, conducting sales and leasing, and providing building management and after-sales services), operate independently in each group and the results of their work or activities are not considered consolidated in any analysis of the business of the groups.

The operational consistency of the entire Group is ensured by the fact that three members of the Management Board of Echo Investment S.A. and two representatives of the Supervisory Board of Echo Investment S.A. sit on the seven-member Supervisory

Board of Archicom S.A. (this is not a rule, but the result of a decision of the GMS). Nicklas Lindberg, the President of Echo Investment S.A. and the Chairman of the Supervisory Board of Archicom S.A., plays the largest part when it comes to coordinating the work of both of the Management Boards.

To properly understand the functioning of the Group and to faithfully present the responsibilities in connection with key issues, this report presents information on the Management Boards of the two main companies in the Group and, where relevant, presents information separately for the two groups.

The Management Boards of both main Companies serve as the executive bodies. They oversee all affairs of their Company, subject to the limitations set forth by the provisions of the Commercial Companies Code and the Company's Articles of Association. This encompasses responsibility for managing impacts, risks, and opportunities. These powers and duties are executed through the implementation of relevant policies applicable within the Group, the management of subordinate employee resources, the clearly defined responsibilities of each Management Board member, and the objectives established for both Management Boards and its individual members by the Supervisory Boards.





## The composition of the Echo Investment S.A. Management Board, professional biographies of its members, along with their expertise, experience, and skills in managing sustainability issues



**Nicklas Lindberg**

President of the Management Board, CEO

Nicklas Lindberg has been the CEO of Echo Investment since 2016. He is responsible for the strategy and development of the company. In 2021, Echo Investment acquired Archicom S.A., a Wrocław-based development company, and Nicklas Lindberg became the Chairman of its Supervisory Board.

Since 2016, Echo Investment has significantly grown its scale of operations and pipeline. The Strategy of Profitable Growth that he helped transformation of Echo Investment into a pure developer, which now operates in seven major Polish cities, as well as a market leader in the residential, office, and retail real estate sectors. The Group began to design and build urban

‘destination’ projects, which combine all of the above-mentioned functions and are well-designed parts of the relevant cities, in which people can live, work, and spend their free time. Echo Investment has also begun operating in flex office spaces (CitySpace) as well as the rental apartment (Resi4Rent) sectors. With a goal of increasing its presence in the residential market, in 2021, Echo Investment acquired Archicom S.A., a Wrocław-based development company.

Until 2015, Nicklas Lindberg was employed by Skanska Group, in which he held several top positions, such as the President of Skanska Commercial Development Europe (CDE), Head of Skanska Property Poland, CFO and CEO of Skanska, Russia, and was a manager of residential development units in the Nordic regions. He graduated from the University of Lund in 2001.

### Knowledge, experience, and skills related to managing sustainable development issues:

- 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.

### Scope of training to obtain a certificate of “ESG training for Management Boards and Teams”:

- the role of ESG as a business standard;
- the business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector; and
- the role of Management Boards and Supervisory Boards in managing ESG transformation.



**Maciej Drozd**

Vice-President, CFO

Maciej Drozd has been on the Management Board since 2015 and his responsibilities include financing and back office operations.

While he was introducing the Profitable Growth Strategy, he restructured the Echo Investment Group. His tasks included changing the model regarding the operations and financing of the Group — from the long-term owner of a portfolio of commercial real estate generating fixed income from rent to a pure developer focused on fast capital turnover and generating high returns. The Company is also one of the largest bond issuers in the real estate sector.



The composition of the Echo Investment S.A. Management Board, professional biographies of its members, along with their expertise, experience, and skills in managing sustainability issues

He joined Eastbridge Group in 1995, initially as the Financial Director of the Group’s operational companies. Between July 2009 and June 2015, he was also the CFO and Managing Partner of the Group.

He studied philosophy, mathematics, and management at the University of Warsaw and holds a master’s degree in philosophy, as well as a master’s degree in management. Maciej also holds an MBA degree from the University of Illinois.

Knowledge, experience, and skills related to managing sustainable development issues:

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

Scope of training to obtain a certificate of “ESG training for Management Boards and Teams”:

- the role of ESG as a business standard;
- the business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector; and
- the role of Management Boards and Supervisory Boards in managing ESG transformation.



**Artur Langner**  
Vice-President of the  
Management Board

Artur Langner joined the Management Board in June 2005 and was designated as the Vice President in 2008. Artur is responsible for contracting and valuations in the construction sector of the Group.

Artur began working for Echo Investment in 1998 as a Project Manager. In 2000 he was appointed Director of Project Preparation and later on he was promoted to Director of the Technical Division.

He is a graduate of the Faculty of Civil Engineering at the Kielce University of Technology. After finishing his studies, he started working in the

construction sector, where he gained experience in every stage of project construction.

Knowledge, experience, and skills related to managing sustainable development issues:

- corporate governance;
- supply chain management;
- environmental protection;
- construction site safety;
- human resource management.

Scope of training to obtain a certificate of “ESG training for Management Boards and Teams”:

- the role of ESG as a business standard;
- the business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector;
- the role of Management Boards and Supervisory Boards in managing ESG transformation.



## The composition of the Echo Investment S.A. Management Board, professional biographies of its members, along with their expertise, experience, and skills in managing sustainability issues



### Rafał Mazurczak

Member of the Management Board, COO

Rafał Mazurczak has been a member of the Management Board since 2016. He is responsible for the Echo Commercial Properties Department: design, implementation, lease and management of space, and fit-outs.

He began his career at Echo Investment in 2000 as an Office Leasing Manager. From 2007-2013, he was the Leasing Director of Echo Investment's Office Department. In 2013, he was appointed as the Director of the Office Department. He co-created the development strategy of this part of Echo Investment's business and was responsible for the implementation thereof. He was also responsible for the construction, leasing, and marketing of one of the company's

flagship projects, the Q22 skyscraper in Warsaw, along with Park Rozwoju, and the O3 Business Park in Kraków, the A4 Business Park in Katowice, the Tryton office building in Gdańsk, as well as West Gate and Nobilis in Wrocław. In 2021, Echo Investment merged the departments responsible for office and retail properties and Rafał Mazurczak assumed the responsibility for the newly created Commercial Properties Department.

#### Knowledge, experience, and skills related to managing sustainable development issues:

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

#### Scope of training to obtain a certificate of “ESG training for Management Boards and Teams”:

- the role of ESG as a business standard;
- the business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector; and
- the role of Management Boards and Supervisory Boards in managing ESG transformation.



### Małgorzata Turek

Member of the Management Board

Małgorzata Turek was appointed to the Management Board in 2019 and is responsible for investment, divestment, obtaining permits, and the preparation of projects. In 2021, following Echo Investment's acquisition of the Wrocław-based development company Archicom S.A., she became a Member of its Supervisory Board.

She has over twenty years of experience in the real estate sector, working for both investment and development companies as well as international law firms. She specializes in asset management as well as real estate transactions.

In 2017, she became the President of Globalworth Poland Real Estate, where she was responsible



for, among other things, the organization and development of a sustainable, revenue-generating property portfolio. She also gained valuable experience at Skanska Property Poland. During the period of 2012-2017, as a Board Member (COO), she was responsible for the company's transactions and operations. Previously, she worked for leading law firm Linklaters, where she specialized in transactions on the commercial real estate market.

She is a graduate of the faculty of law and administration of the Jagiellonian University in Kraków and a member of the Polish Bar Association.

#### Knowledge, experience, and skills related to managing sustainable development issues:

- corporate governance;
- enterprise impact management;
- construction site safety;
- human resource management.

#### Scope of training to obtain a certificate of “ESG training for Management Boards and Teams”:

- the role of ESG as a business standard;
- the business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector; and
- the role of Management Boards and Supervisory Boards in managing ESG transformation.

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

### The composition of the Archicom S.A. Management Board, professional biographies of its members, along with their expertise, experience, and skills in managing sustainability issues



#### Waldemar Olbryk

President of the Management Board, CEO

Waldemar Olbryk has been the President of Archicom S.A. since 2021 and is responsible for the strategic management of the Company, with particular emphasis on the implementation of innovations, digitalization processes, and the implementation of investments consistent with the concepts of smart cities and 15-minute cities. Since 2023, he has been responsible for issues related to ESG in the Echo-Archicom Group.

He has over twenty years of experience in managing business projects in Poland. He specializes in areas related to land purchase and the implementation of development projects. In his earlier career, he participated in such projects as the development of the BP petrol station network

and the implementation of the Manufaktura project in Łódź. He also cooperated with Philips Lighting. In 2008 he joined Skanska, where from 2011-2014 he held the position of the President of Skanska Property Poland. Since 2017, he has been associated with the Echo Investment Group, where as a Member of the Management Board he headed the Housing Department.

He graduated from the Faculty of Economy at the University of Łódź and completed MBA studies jointly run by the University of Łódź and the College of Maryland. He obtained the title of Professional Project Manager according to the standards of the Project Management Institute. In 2018, he became a member of the Royal Society for the Arts, Manufactures and Commerce (RSA). As the initiator and co-creator of the PlayFair event, organized during the Soundedit festival in Łódź, he connects the worlds of business, art, and science, while promoting dialogue between these fields.



## The composition of the Archicom S.A. Management Board, professional biographies of its members, along with their expertise, experience, and skills in managing sustainability issues

### Knowledge, experience, and skills related to managing sustainable development issues:

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

### Scope of training to obtain a certificate of “ESG training for Management Boards and Teams”:

- the role of ESG as a business standard;
- the business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector;
- the role of Management Boards and Supervisory Boards in managing ESG transformation.



**Agata Skowrońska-Domańska**  
Vice-President of the Management Board, CFO

Agata Skowrońska-Domańska is responsible for overseeing the company's financial strategy, ensuring its financial liquidity, and implementing corporate governance principles. She is also involved in creating innovative solutions supporting the company's digital transformation, taking into account operations, data processing, and organizational culture.

She has been associated with the real estate industry for over 20 years. She gained experience in such real estate companies as Skanska, Bouygues Immobilier, Yareal, and Simon & Ivanhoe. From 2017-2023, she was the Director of Strategic Planning at Echo Investment.

She specializes in asset management, investment properties, business management, mergers & acquisitions, contract negotiations, digital transformation, business process management, PropTech, and information technology. She is a business development expert holding a Canadian Executive MBA in Strategic Management from Université de Montréal.

She is a laureate of prestigious industry awards, including Top Woman in Real Estate 2019 in the Innovation and Technology category and Strong Women in IT 2021. Her achievements have been recognized for her contributions to the development of modern solutions in the real estate industry and promoting values related to corporate management.

### Knowledge, experience, and skills related to managing sustainable development issues:

- corporate governance;
- enterprise impact management;
- risk management;
- human rights.

### Scope of training to obtain a certificate of “ESG training for Management Boards and Teams”:

- the role of ESG as a business standard;
- the business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector;
- the role of Management Boards and Supervisory Boards in managing ESG transformation.



## The composition of the Archicom S.A. Management Board, professional biographies of its members, along with their expertise, experience, and skills in managing sustainability issues



### Dawid Wrona

Member of the Management Board

Dawid Wrona has been associated with the Company since 2022. As a member of the Management Board, he is responsible for implementing the company's sales and marketing strategy, including the development of innovative solutions supporting customer service as well as implementing modern methods of managing customer experience. As the Chief Operating Officer for the entire Archicom Group, he is also responsible for investment execution.

He has 20 years of experience in the development industry, which he gained in leading companies in Poland and abroad. During his career, he has held key positions in various companies, including Dom Development, Marvipol, and Impact

Developer & Contractor — one of the largest developers in Romania. For six years, he had been associated with Echo Investment, where he managed residential projects and contributed to the development of sales and marketing.

He is a graduate of prestigious development programs, including Foundations For Business at IMD (Switzerland) and the ICAN Institute. Thanks to his education and professional experience, he is considered one of the leading experts in the area of sales and marketing management in the real estate development sector.

#### Knowledge, experience, and skills related to managing sustainable development issues:

- corporate governance;
- enterprise impact management.

#### Scope of training to obtain a certificate of “ESG training for Management Boards and Teams”:

- the role of ESG as a business standard;
- the business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector;
- the role of Management Boards and Supervisory Boards in managing ESG transformation.



### Rafał Zboch

Member of the Management Board

Since 2021 Rafał Zboch has been responsible for areas related to compliance, legal services, as well as obtaining administrative permits and new investment opportunities, as a Member of the Management Board.

He has approximately 25 years of experience in the residential and commercial real estate industry. For 17 years, he was employed in the Warsaw branches of renowned international law firms, where he specialized in legal services for large investment projects related to real estate development. As a legal advisor, he participated, in particular, in the project of building the National Stadium in Warsaw. From 2017-2023, he was



the Director of the Echo Investment Legal Office and supervised key legal aspects of development projects.

He is a graduate of the Faculty of Law and Administration of the University of Warsaw and a legal advisor. He also completed post-graduate studies in European law and art history.

He is the President of the Foundation for the Reconstruction of Dwór Sarny, which is implementing a multi-year renovation program of this historic building located near Kłodzko. This venue has hosted many significant cultural events, including, above all, the literary festival "Mountains of Literature" by Olga Tokarczuk.

Knowledge, experience, and skills related to managing sustainable development issues:

- corporate governance;
- enterprise impact management;
- human rights.

Scope of training to obtain a certificate of “ESG training for Management Boards and Teams”:

- the role of ESG as a business standard;
- Business benefits of ESG;
- the impact of the financial sector on ESG management;
- an overview of ESG strategies in the construction sector;
- the role of Management Boards and Supervisory Boards in managing ESG transformation.

Echo Investment S.A. Management Board gender diversity as of 31 December 2024 [in percents]

	Number	Share
Women	1	20%
Men	4	80%
Total	5	100%

The Group did not reveal any cases of gender non-reporting or people identifying with a gender other than male or female.

Echo Investment S.A. Management Board diversity of nationality as of 31 December 2024 [in percents]

	Number	Share
Polish	4	80%
Swedish	1	20%
Total	5	100%

Archicom S.A. Management Board gender diversity as of 31 December 2024 [in percents]

	Number	Share
Women	1	25%
Men	3	75%
Total	4	100%

The Group did not reveal any cases of gender non-reporting or people identifying with a gender other than male or female.

All members of the Management Board of Archicom S.A. are Polish citizens.





## Oversight of sustainability matters within the Management Board and the Supervisory Board

There are no committees or designated individuals within the Group's Management Board responsible for overseeing impacts, risks, and opportunities related to sustainability.

The person responsible for these matters at Echo Investment (the part of the Group responsible for commercial projects) is Maciej Drozd, Vice President of Echo Investment S.A., while in the Archicom Group (the part of the Group responsible for residential projects), it is Waldemar Olbryk, President of Archicom S.A. These responsibilities are assigned to specific individuals (rather than positions) based on their expertise, experience, and related responsibilities.

Oversight of the activities of the mentioned Management Board members is carried out by Nicklas Lindberg, the CEO of Echo Investment and the Chairman of the Supervisory Board of Archicom S.A. His responsibilities include setting priorities and assigning tasks in the area of sustainability, as well as overseeing and evaluating the completion of those tasks.

The 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 to the Management Board and Supervisory Board

Risks and sustainability priorities are communicated to the Management Board (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.

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. Those 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, or during visits at construction sites.

### Reporting to the Management Board

Reporting matters to the Management Board regarding corporate governance processes, controls, and procedures used to monitor, manage, and oversee impacts, risks, and opportunities is done through the heads and managers of the relevant units, and cross-sectionally through the Director of Internal Auditing and Business Controlling Team. Such reporting of matters is one of the responsibilities of the heads of the relevant units, and the form, frequency, and scope of such reporting depends on the agreed principles of collaboration and current needs of the Management Board and the Group.

In regard to managing impacts, risks, and opportunities related to sustainable development, the Group does not apply specific controls or procedures and utilises the same tools that are available in connection with the Group's other internal functions - in particular, business control.

### Reporting to the Supervisory Board

Reporting matters to the Supervisory Board regarding corporate governance processes, controls, and procedures used to monitor, manage, and oversee impacts, risks, and opportunities is done through the Management Board and the Director of Internal Auditing, who has the formal authority to work directly with the Supervisory Board. In practice, the Supervisory Board delegates this part of its authority to the Audit Committee.



## Group's impact management structure

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

- tracking the implementation of the Sustainability strategy,
- approval of sustainability, impact management and reporting 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.

### 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 sustainability strategies and policies and impact management, if arising from the Group's day-to-day management,
- ensuring that the Group's operations comply with legal requirements,
- determining the Group's sustainability and impact management 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

The responsibility and authority of each body in regard to impacts, risks, and opportunities derives from the general powers of each body as described above. The responsibilities of the individuals sitting on a particular body result from an established distribution of tasks and competences. This applies in particular to the members of the Management Boards designated as responsible for issues related to sustainable development.

### Process for setting sustainable development goals and overseeing their achievement

The goals of the Group's Sustainability Strategy were developed as a result of analyzing the expectations of stakeholders, the impact of the Group, as well as its technical, financial and operational capabilities. The Group's Sustainability Strategy and the goals thereof were created by selected members of the Management Boards of Echo Investment and Archicom as well as representatives of senior management.

The Management Board is responsible for setting the annual sustainable development goals, and these goals will subsequently cascade down to lower-level employees, in accordance with the relevant hierarchy and scope of responsibilities for a given area. It is the task of the directors and managers responsible for a relevant goal (or goals) to track the achievement of such goal (or goals) as part of a regular review of the achievement of all other business goals. The method applicable to monitoring and tracking the above-mentioned achievements, and the frequency of

such, will be determined by the approach of the individual director or manager, as well as the related routines and applicable business needs.

The overall monitoring of the progress of the sustainable development goals by the Management Board takes place on an ongoing basis and, through the use of internal information and management systems (ESG flow, PowerBI), and by those responsible for the relevant areas or ad hoc meetings (e.g. on construction sites) conducting regular meetings and presentations.

The Supervisory Board oversees the achievement of the current business and sustainable development goals by way of holding regular meetings with the Management Board. In line with the approach presented above, the goals of the Management Board are aligned with those of the Group and its employees.

### ESG Steering Committee

The steering committee is an advisory body to the Management Boards of Echo Investment and Archicom. It is composed of members of the Management Boards of Echo Investment and Archicom responsible for sustainability issues, the Director of Internal Auditing, Echo Investment's Finance Director as well as staff from the ESG Manager. The committee's task is to monitor the progress of the 2030 Sustainability Strategy and its goals.



In 2024, the committee divided the Sustainability Strategy into single and measurable tasks. The ESG team identified and recommended 57 tasks that would contribute to the strategy's goals.

### **This process was carried out in several stages:**

#### **Consultation and assignment of responsibility**

The tasks were discussed with six representatives of the Group's senior management responsible for key business areas. During individual meetings (one with each member of the Management Boards or directors), responsibilities for carrying out specific tasks were assigned. These involved the departments responsible for contracting, HR and legal issues at both Companies, as well as land purchases, commercial projects, finance and law at Echo Investment.

#### **Task cascading**

The tasks assigned to the senior management representatives were delegated by them to specific persons responsible for completing them in the relevant teams.

#### **Progress monitoring**

In the third quarter of 2024, meetings were held in order to carry out an overview of the related progress. They were attended by the same board members or directors responsible for specific

functions within the Group, managers responsible for the implementation of specific tasks, and the Director of Internal Auditing.

In 2025, the Group intends to continue its review of the progress in relation to its sustainability strategy goals and to extend such review to other teams and functions.

The consultation and monitoring meetings were organized by the ESG Manager and were not attended by members of the Supervisory Board.

The steering committee oversees and coordinates the Group's activities in terms of introducing and updating sustainability-related policies, implementing strategies, and reporting readiness. A meeting in regard to the above-mentioned actions took place with Deloitte experts, among others, on 9 February 2024.

In addition, a meeting of the steering committee was held on 7 October 2024 to discuss current reporting issues (e.g. defining reporting boundaries and the consistency of reporting in accordance with the needs of Echo Investment's main shareholder), as well as issues related to a scheduled training workshop for the Management Boards and the Supervisory Board.

### **Building the Group's competence in the area of sustainable development**

The steering committee also looks at the Group's needs in terms of skills and expertise regarding sustainable development issues. The Group addresses identified issues by way of the following:





- developing the knowledge of its own employees through training, courses, postgraduate studies, etc.;
- sharing internal knowledge and know-how among employees of the Group;
- purchasing consultancy services from professional bodies specialized in specific issues; and
- introducing new systems and procedures to improve the management of sustainable development issues, as well as monitoring the progress of the Group's goals.

The Group aims to develop internal competencies and skills in order to reduce the Group's dependence on external expertise. The Group seeks to independently monitor regulatory requirements, maintain and develop its internal systems related to the management of sustainable development issues, and work effectively with external service providers.

The Management Board and Supervisory Board are able to effectively manage and oversee sustainable development issues in the Group due to the members of such boards having the necessary experience, past training and education programs, as well as access to experts and further training courses. The skills and expertise held by the members of the Management Board and Supervisory Board correspond to the relevant issues identified during the double materiality assessment process, in particular:

- impact management;
- safety on construction sites;
- corporate governance;
- risk management;

- human rights;
- environmental protection;
- human resources management.

GOV-3

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

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 Group, which also includes an element related to sustainability matters.

The remuneration of the Management Board consists of a fixed component and a variable component. 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, as well as individual goals. Among the goals may be matters related to sustainability. The Management Board's goals are set and reviewed by the Supervisory Board.

In 2024, the goals for each member of the Management Boards of Echo Investment and Archicom included completing eight Executive Site Safety Visits (ESSV) at construction sites. Additionally, the members of the Management Board of Echo Investment had, as part of their objectives for 2024, the supervision of the implementation of the sustainable development strategy goals set

for 2024 within their respective areas of responsibility. The members of the Management Board of Archicom were not assigned any additional objectives related to sustainable development for 2024. Both Supervisory Boards confirmed that the Management Board members fulfilled these tasks.

Failure to fulfill the aforementioned tasks could result in a reduction of the variable portion of the maximum annual remuneration by 10 percent for Archicom Management Board members and by 20 percent for Echo Investment Management Board members.

At the end of the year, the Management Boards are evaluated and held accountable for the achievement of these objectives by the Supervisory Boards. The Supervisory Boards are authorized to establish, update, and approve the objectives of their Management Board.

The Group's Management Board's objectives are cascaded down to lower employee levels, whose annual goals are aligned with those of the Management Board and support their accomplishment.

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 General Meeting of Shareholders. Currently, it is structured as a fixed remuneration, determined by the roles held within the Supervisory Board and its committees, and is not dependent on the Group's achievement of sustainability objectives



Reporting to the Management Board on significant impacts, risks, and opportunities, the implementation of due diligence, and on the outcomes and effectiveness of policies, actions, indicators, and goals

GOV-1, GOV-2

Scope of impacts, risks, and opportunities	Responsibility for reporting in the scope	Frequency and form of reporting
Implementation of the Sustainability Strategy	Maciej Drozd (Vice-President) in Echo Investment and Waldemar Olbryk (CEO) in Archicom	Meetings of the Management Board, Supervisory Board, Audit Committee, current meetings
Issues related to Group employees	HR Department	On an ongoing basis, if necessary
Workers on construction sites	Site managers, HSE teams	Monthly reports, quarterly summaries, annual meeting, during ESSV visits to construction sites, as needed on an ongoing basis
Environmental issues directly related to the projects under construction	Architects Department, Realisation Department, Health, Safety and Environmental Team	Weekly meetings, site meetings, working meetings related to projects under preparation
Environmental management standards for construction sites	Health, safety and environmental teams, site managers	Monthly reports, quarterly summaries, annual meeting, during ESSV visits to construction sites, as needed on an ongoing basis
Relations with construction neighbours	Construction Management, Marketing Department, Communications Department	On an ongoing basis, if necessary
Establishing and consulting on legal solutions concerning the Group's activities	Staff delegated to liaise with the industry organisations concerned, Legal Department, ESG Team	In the event of ongoing needs related, inter alia, to new responsibilities for the Group
Human rights	Legal Department, HR Department	On an ongoing basis, if necessary



GOV-2

## Communicating sustainability issues to the Group's bodies and the issues being addressed

The Management Board considers impacts, risks and opportunities in relation to sustainable development when overseeing the implementation of the Group's strategy, as well as when entering into significant transactions.

Sustainable development impacts, risks, and opportunities are reviewed regularly as part of the Group's overall risk analysis. When analysing potential transactions, the Management Board considers entering into transactions in which it would control, or could control, sustainable development risks, i.e. if the Group has the tools to manage the identified risks before, during, and after the transaction.

The Group's risk management processes take into account a range of impacts, risks, and opportunities in connection with sustainable development, including all those identified as material in the double materiality study. Sustainability risks are managed as part of the Group's overall risk management and by using the tools available to it.

**The following are material sustainability issues dealt with by the Audit Committee of Echo Investment's Supervisory Board in 2024:**

- the approval of the internal audit plan for 2024 and its scope in relation to the Sustainability Strategy and the Company's preparation for reporting in accordance with the ESRS;
- the summary of internal audit activities in 2023 and the first quarter of 2024, including compliance and risk management issues;
- the presentation of the Towarowa 22 project audit results with regard to the subject of sustainable development and the compliance of the project with the Group's strategic goals;
- the presentation of the Group's sustainable development practices to the members of the supervisory board of the Wing group — as part of the preparation for the alignment of the methodology for reporting sustainable development issues;
- the summary of the internal audit of the implementation of the Group's Sustainability Strategy.

**The following are material sustainability issues dealt with by the Audit Committee of Echo Investment's and Archicom's Supervisory Boards in 2024:**

- the approval of the internal audit plan for 2024 and its scope in relation to the Sustainability Strategy;
- the discussion on the implementation of the internal audit plan for 2024 taking into account sustainable development issues;
- the discussion regarding the sound implementation of the Company's Sustainability Strategy.

In 2024, the Supervisory Boards of Echo Investment and Archicom did not address relevant sustainable development issues in their full composition.

**The following are material sustainability issues addressed by the Management Boards of Echo Investment and Archicom in 2024:**

- The following are material sustainability issues addressed by the Management Boards of Echo Investment and Archicom in 2024:
- the discussion on the Group's sustainability reporting obligations, the status of its decarbonisation strategy, the scheduled update of the Group's sustainability strategy, sustainability training for the members of the Management and Supervisory Boards, as well as the expansion of the ESG flow data collection system;
- the review of EHS management on construction sites — annual meetings of the Management Boards of both companies that summarize the past year on construction sites, discussing the main indicators monitored, as well as the plans for the coming year;
- the EHS Annual Briefing — ISO 45001 and ISO 14001 — annual training sessions for Management Boards related to the ISO management system;
- the participation of selected members of the Management Boards in the certification process of the ISO 45001 and ISO 14001 management systems.





## Workshops for the Management Boards and Supervisory Boards

In 2024, workshops were held for the Management Boards (in addition to Echo Investment and Archicom, they also included the Management Boards of subsidiaries and affiliated companies: CitySpace, Resi4Rent and StudentSpace) and the Supervisory Boards of Echo Investment S.A. and Archicom S.A.

The training sessions lasted approximately two hours and focused on the following topics:

- managing sustainable business development as a new standard in business, which constitutes a key element of the Group's long-term business strategy;
- advantages in connection with the proper management of sustainable business development;
- understanding the impact of the financial sector on the sustainability of companies (EU taxonomy, Green Deal);
- best practices for managing sustainable business development in companies, integrating ESG factors into operational processes, and company strategies;
- the role of management and supervisory boards in regard to managing the sustainable transformation of companies and the integration of sustainability factors into business processes, as well as the regulatory responsibilities of these bodies.

The training sessions were conducted in such a way as to embed sustainable development issues in the context of achieving business goals and the real estate industry.

The training sessions, organized and funded by the Group, were conducted by external experts from the consulting firm KPMG.

GOV-4

## Due diligence statement

The due diligence process covers the identification and management of human rights and the environment in the Group's value chain. The table below indicates the risks and the location of the due diligence information in this report, including how the due diligence process is applied within the Group. The competences of the Management Board and Supervisory Board in relation to sustainability are described in disclosure GOV-1.





Basic elements of the due diligence process	Area	Data and issuespoints
Integrating due diligence into corporate governance, strategy and business model	E, S, G	<div>GOV-1</div> <ul style="list-style-type: none"><li>Management of the Group and sustainability matters</li><li>Oversight of sustainability matters within the Management Board and the Supervisory Board</li><li>Group impact management structure</li><li>Reporting to the Management Board on significant impacts, risks, and opportunities, the implementation of due diligence, and on the outcomes and effectiveness of policies, actions, indicators, and goals</li></ul>
		<div>GOV-2</div> Communicating sustainability issues to the Group's bodies and the issues being addressed
		<div>IRO-1</div> Double materiality
	G	<div>G1-1</div> Business policies and corporate culture
	S	<div>S1-1</div> Compliance with human rights
		<div>S4-1</div> <ul style="list-style-type: none"><li>Data protection</li><li>Honest marketing practices</li></ul>

Basic elements of the due diligence process	Area	Data and issuespoints
Engagement with affected stakeholders at all key stages of the due diligence process	E, S, G	<div>SBM-2</div> Key stakeholders of the Group
		<div>IRO-1</div> Double materiality
		<div>SBM-3</div> Relevant themes resulting from the double materiality assessment
	S	<div>S2-2</div> Collaboration with the workforce of the value chain in terms of impacts
		<div>S3-2</div> Cooperation processes regarding interactions with affected communities
Identification and assessment of adverse impacts	E, S, G	<div>IRO-1</div> Double materiality
		<div>SBM-2</div> Key stakeholders of the Group
		<div>G1-1</div> Whistleblowing system
	S	<div>S1-2</div> Procedures for working with own employee resources and employee representatives
		<div>S1-3</div> Processes for remedying adverse impacts and channels for reporting concerns by own workforce resources
		<div>S1-10</div> Incidents, complaints and serious impacts on human rights
		<div>S2-1</div> Human rights related to construction contractors



Basic elements of the due diligence process	Area	Data and issuespoints
Take action to reduce identified adverse impacts	E, S, G	<div>SBM-1</div> Echo-Archicom 2030 Sustainable Development Strategy
		<div>SBM-2</div> Key stakeholders of the Group
	E	<div>E1-3</div> Actions and resources in relation to climate policy
		<div>E3-2</div> Water management activities and resources of the Group
	S	<div>S1-1</div> Remedies for human rights violations
		<div>S1-2</div> Topics consulted with employee representatives in 2024
		<div>S1-3</div> Processes for remedying adverse impacts and channels for reporting concerns by own workforce resources
		<div>S2-1</div> Management of worker safety on construction sites
		<div>S2-3</div> Processes for addressing the consequences of negative impacts and reporting channels for individuals working within the value chain
		<div>S3-2</div> Management of complaints and comments
		<div>S4-3</div> Processes to remediate negative impacts and channels for consumers and end-users to raise concerns
	G	<div>G1-3</div> Prevention and detection of corruption and bribery

Basic elements of the due diligence process	Area	Data and issuespoints
Monitoring the effectiveness of these efforts and providing relevant information in this regard	E, S, G	<div>GOV-1</div> Reporting to the Management Board on significant impacts, risks, and opportunities, the implementation of due diligence, and on the outcomes and effectiveness of policies, actions, indicators, and goals
	E	<div>E1-6</div> Greenhouse gas emissions
		<div>E3-4</div> Water consumption
		<div>E4-5</div> Ensuring the adequate replacement of removed trees
		<div>E5-5</div> Resource outflows
	S	<div>S2-4</div> Taking action on material impacts in connection with the workforce in the value chain (in particular: Process of investigating work-related accidents)
	G	<div>G1-4</div> Incidents of corruption or bribery



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

GOV-5

Among the sustainability risks identified, the Group has recognized risks related to reporting. These include risks related to the completeness and integrity of data, the accuracy of estimates, the availability of upstream or downstream value chain data, and the timelines for releasing information. An additional risk point is the rapidly increasing number and scope of sustainable development reporting requirements, which may cause the Group to overlook new key requirements or fail to prepare in time for new reporting obligations.

These risks are managed through the operation of a team of ESG reporting specialists, support from reputable external experts, regular reviews and monitoring with the involvement of the Management Board and senior management, as well as the continuous expansion of the internal ESG Flow IT system.

### 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 and non-financial statements by an independent auditor.

The Group internally controls sustainability reporting through data verification conducted by a dedicated ESG expert team, a steering committee, oversight by Management Board members, support from external advisors, supervision by the Audit Committee of the Supervisory Board, internal audit, and assurance services.

The Group's sustainability reporting is the responsibility of the ESG team led by ESG Manager.

At the Echo Investment Group, the responsibility for managing sustainability 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 of the Group and taking into account past experiences, makes it possible to respond quickly and flexibly to needs. Individual responsibilities related to 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.



#### Prioritizing of sustainability risks is carried out by means of the following:

- The Group's sustainability strategy;
- The double materiality assessment;
- The analysis of current information and events from the company (whistleblowing reports, identified system gaps, new legal requirements).



# Key stakeholders of the Group

SBM-2

Stakeholder	Method of engagement	Frequency of contact	Purpose of cooperation	Taking into account the results of cooperation
INTERNAL STAKEHOLDERS				
<b>Group employees and associates</b> <ul style="list-style-type: none"><li>• working in offices,</li><li>• working on construction sites,</li><li>• provided by employment agencies,</li><li>• supporting companies (benefits, medical, training, etc.).</li></ul>	<b>Ongoing cooperation</b> <ul style="list-style-type: none"><li>• cooperation with employee representatives (elected by the entire workforce),</li><li>• procedure for reporting and dealing with irregularities,</li><li>• intranet,</li><li>• newsletters,</li><li>• thematic mailings,</li><li>• posters,</li><li>• contacts with managers and HR representatives,</li><li>• employee opinion surveys,</li><li>• team-building events,</li><li>• workshops and training courses.</li></ul> <b>Method of direct engagement in the double materiality assessment</b> <ul style="list-style-type: none"><li>- survey via the intranet, internal newsletter and social media.</li></ul>	<ul style="list-style-type: none"><li>• on an ongoing basis,</li><li>• in accordance with the timetable of significant Group events for employees,</li><li>• when introducing an employee to the Group (onboarding),</li><li>• on an ad hoc basis, as and when required.</li></ul>	<ul style="list-style-type: none"><li>• maintaining competent and committed staff within the Group,</li><li>• developing the Group's perspectives through the development of staff competence</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 the voices of employee representatives in strategic and operational processes requiring their participation,</li><li>• adapting the subject matter of training to the reported demand,</li><li>• responding to current issues raised.</li></ul>
<b>Companies belonging to the Echo Investment Group (business segments)</b> <ul style="list-style-type: none"><li>• Archicom S.A. - apartments for sale,</li><li>• Resi4Rent - apartments for rent,</li><li>• CitySpace - lease of flexible office space.</li></ul>	<b>Ongoing cooperation</b> <ul style="list-style-type: none"><li>• day-to-day cooperation with company representatives at various levels (Management Boards, directors of sister departments, thematic and project teams),</li><li>• cooperation resulting from the ownership structure: continuous reporting, regular strategy meetings, meetings of the bodies of the various entities, provision of financial data for reporting.</li></ul> <b>Method of direct engagement in the double materiality assessment</b> <ul style="list-style-type: none"><li>• participation of representatives in a panel discussion.</li></ul>	<ul style="list-style-type: none"><li>• on an ongoing basis,</li><li>• according to the schedule of ongoing projects,</li><li>• according to the schedules resulting from financial reporting,</li><li>• ad hoc, as and when required.</li></ul>	<ul style="list-style-type: none"><li>• maintaining consistency in the Group's implemented business and ESG strategies,</li><li>• conducting joint business projects,</li><li>• meeting legal requirements.</li></ul>	<ul style="list-style-type: none"><li>• taking into account the opinion of the representatives of the entities in strategic decision-making - in particular concerning joint projects,</li><li>• cross-sectoral use of the knowledge and experience of the representatives of the various Group entities.</li></ul>



Stakeholder	Method of engagement	Frequency of contact	Purpose of cooperation	Taking into account the results of cooperation
EXTERNAL STAKEHOLDERS				
<b>Owners, shareholders, investment funds</b> <ul style="list-style-type: none"><li>Wing - Griffin Capital Partners - major shareholders,</li><li>- Institutional investors, including potential shareholders,</li><li>- banks and financing institutions,</li><li>- stock exchange,</li><li>- brokerage houses and analysts - including from Poland and abroad,</li><li>- AFI Europe, EPP, Signal Capital Partners - co-investors in development projects.</li></ul>	<b>Ongoing cooperation</b> <ul style="list-style-type: none"><li>interim and current reports</li><li>press releases,</li><li>regular meetings with analysts and shareholder representatives,</li><li>presentations,</li><li>General Meeting of Shareholders.</li></ul> <b>Method of direct engagement in the double materiality assessment</b> <ul style="list-style-type: none"><li>participation of representatives in a panel discussion,</li><li>survey via email invitation and social media.</li></ul>	<ul style="list-style-type: none"><li>in accordance with the financial reporting schedule,</li><li>according to the schedule of announced AGMs,</li><li>as and when required on an ongoing basis.</li></ul>	<ul style="list-style-type: none"><li>building confidence in the Group and its bodies,</li><li>stimulating the valuation of Archicom on the WSE,</li><li>obtaining acceptance and confirmation of the strategic directions chosen,</li><li>fulfilling legal obligations.</li></ul>	<ul style="list-style-type: none"><li>implementation of the strategic decisions of the AGM by the Group,</li><li>guided by the indications of shareholders and their representatives in creating Group policy,</li><li>adapting reporting and data presentation to shareholder needs.</li></ul>
<b>Social environment</b> <ul style="list-style-type: none"><li>local communities within the investment area (affected communities),</li><li>local government administration,</li><li>representatives of universities.</li></ul>	<b>Ongoing cooperation</b> <ul style="list-style-type: none"><li>project websites and its social media channels</li><li>information and marketing materials,</li><li>events organised by the Group,</li><li>press releases,</li><li>public consultations,</li><li>employee volunteering.</li></ul> <b>Method of direct engagement in the double materiality assessment</b> <ul style="list-style-type: none"><li>survey via email invitation and social media.</li></ul>	<ul style="list-style-type: none"><li>in the course of preparatory and administrative work (at the design and consultation stage),</li><li>in accordance with the established marketing schedule for the property,</li><li>on an ongoing basis during the construction and operation of the building (investment).</li></ul>	<ul style="list-style-type: none"><li>obtaining the required permits and administrative decisions,</li><li>promoting the Group's investments,</li><li>stimulating the visitation and turnover of restaurants and service outlets operating in the Group's investments,</li><li>managing the needs and expectations of the local community.</li></ul>	<ul style="list-style-type: none"><li>taking into account the expectations and requirements of local authorities - especially in terms of design and administrative procedures,</li><li>commercial and non-commercial offerings taking into account feedback from visitors,</li><li>modification of plans and management to avoid local conflicts.</li></ul>



Stakeholder	Method of engagement	Frequency of contact	Purpose of cooperation	Taking into account the results of cooperation
EXTERNAL STAKEHOLDERS				
<b>Clients</b> <ul style="list-style-type: none"><li>individual (apartments buyers and tenants),</li><li>commercial (tenants of office and retail spaces, service premises, particularly in "destination" projects).</li></ul>	<b>Ongoing cooperation</b> <ul style="list-style-type: none"><li>face-to-face meetings at sales offices and occasionally at construction sites,</li><li>telephone calls, video-conferences,</li><li>communication via contract management system CRM,</li><li>participation at housing fairs,</li><li>customer satisfaction surveys,</li><li>website and other social-media channels,</li><li>marketing materials, brochures, and investment prospectuses,</li><li>conferences, marketing events, training.</li></ul> <b>Method of direct engagement in the double materiality assessment</b> <ul style="list-style-type: none"><li>participation of representatives in a discussion panel,</li><li>survey via email invitation and social media.</li></ul>	<ul style="list-style-type: none"><li>in accordance with the timetable of significant events related to the purchase of the flat (booking, contracts, acceptances, formal and legal actions),</li><li>in accordance with the schedule of significant events related to the building sale transaction or the lease agreement,</li><li>occasionally (invitations to events, surveys, etc.),</li><li>occasionally — during industry events, meetings with brokers, and property marketing,</li><li>on an ongoing basis, over building operation and the warranty service period.</li></ul>	<ul style="list-style-type: none"><li>selling flats,</li><li>selling of the building or leasing of its premises,</li><li>enhancing relations that might result in another transaction in the future,</li><li>establishing clear rules and communication channels for after-sales service,</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 customers' needs throughout the housing sales process (in terms of contractual provisions, tenant changes, pricing policy, etc.),</li><li>adapting to customer needs throughout the entire building sales or lease process (in terms of contractual and legal provisions, management, etc.),</li><li>developing the Group's future offerings by considering customer feedback,</li><li>ensuring transparent procedures for after-sales service or resolving emerging disputes,</li><li>building the Group's future housing offer taking into account customer demand.</li></ul>



Stakeholder	Method of engagement	Frequency of contact	Purpose of cooperation	Taking into account the results of cooperation
EXTERNAL STAKEHOLDERS				
<b>Contractors, suppliers and other contractors</b> <ul style="list-style-type: none"><li>• construction companies (contractors and subcontractors),</li><li>• suppliers of materials and raw materials,</li><li>• architects, design offices,</li><li>• suppliers of furnishings and fittings, suppliers of building solutions.</li></ul>	<b>Ongoing cooperation</b> <ul style="list-style-type: none"><li>• information on cooperation standards and applicable rules (made available, e.g. via extranet),</li><li>• ongoing communication within the scope of cooperation,</li><li>• contractual provisions,</li><li>• Code of Conduct and Code of Conduct for Contractors and Suppliers,</li><li>• whistleblowing procedure and handling of irregularities,</li><li>• meetings, conferences and industry events.</li></ul> <b>Method of direct engagement in the double materiality assessment</b> <ul style="list-style-type: none"><li>• participation of representatives in a panel discussion,</li><li>• survey via email invitation and social media.</li></ul>	<ul style="list-style-type: none"><li>• during contract negotiations,</li><li>• weekly (or other agreed cycle) during 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 for cooperation and a clear indication of expectations,</li><li>• promoting the highest health, safety and environmental standards in order to avoid accidents and environmental damage that generate costs for the project,</li><li>• monitoring the correct functioning 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,</li><li>• training programmes for site staff,</li><li>• setting the Group's required project standards.</li></ul>



Stakeholder	Method of engagement	Frequency of contact	Purpose of cooperation	Taking into account the results of cooperation
EXTERNAL STAKEHOLDERS				
<b>Media</b> <ul style="list-style-type: none"><li>• journalists,</li><li>• public opinion,</li><li>• experts,</li><li>• influencers.</li></ul>	<b>Ongoing cooperation</b> <ul style="list-style-type: none"><li>• press officer</li><li>• company website (dedicated page),</li><li>• social media channels</li><li>• interviews, press releases,</li><li>• ongoing relations with journalists,</li><li>• press conferences,</li><li>• interviews.</li></ul> <b>Method of direct engagement in the double materiality assessment</b> <ul style="list-style-type: none"><li>• participation of representatives in a panel discussion.</li></ul>	<ul style="list-style-type: none"><li>• on an ongoing basis,</li><li>• in the significant events within the Group,</li><li>• in the case of industry events or events of importance to the industry, the sector or the economy as a whole.</li></ul>	<ul style="list-style-type: none"><li>• promoting a good reputation for the Group,</li><li>• avoiding reputational crises, reducing their impact or offsetting their effects.</li></ul>	<ul style="list-style-type: none"><li>• responding to reported problems arising (directly or indirectly) from the Group's activities,</li><li>• to modify the message, content or quality.</li></ul>
<b>Industry organisations*</b> <ul style="list-style-type: none"><li>• economic, real estate and environmental organisations,</li><li>• non-governmental organisations.</li></ul>  *for a list of organisations of which the Group is a member, see disclosure G1-5.	<b>Ongoing cooperation</b> <ul style="list-style-type: none"><li>• cooperation within industry or business organisations,</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> <b>Method of direct engagement in the double materiality assessment</b> <ul style="list-style-type: none"><li>• survey via email invitation.</li></ul>	<ul style="list-style-type: none"><li>• on an ongoing basis,</li><li>• for industry events or events of significance to the industry, sector or the economy.</li></ul>	<ul style="list-style-type: none"><li>• influencing decision-makers, legislation and industry regulation,</li><li>• sharing knowledge and experiences.</li></ul>	<ul style="list-style-type: none"><li>• aligning the Group's operations with established industry standards,</li><li>• applying the knowledge and experience gained to the Group's management.</li></ul>



# Topics material to the Echo Investment Group arising from the double materiality assessment

SBM-3

The double materiality assessment indicates that the key sustainability issues for the Echo Investment Group are concentrated in its own operations (employee-related and business conduct issues) and at the higher levels of the value chain (construction management, preparation, design, and the use of materials and resources).

The Group has not assessed the resilience of its strategy and business model in terms of their capacity to address significant impacts and risks or to capitalize on material opportunities.

The double materiality assessment was conducted within the Group for the first time for the purposes of this report. According to the Group's assessment, all material impacts, risks, and opportunities are covered by the disclosure requirements under ESRS.





Theme and sub-theme	Location of significant impact, risk or opportunity	Relevance	Impact, risk or opportunity and time horizon	Relationship with people or the environment	Current and anticipated impacts	Response	Financial impact
ESRS E1 Climate Change. Adap-tation to climate change - imple-menting adapta-tion solutions	The entire value chain. In particular, design (in-house operations) and the activities of hired architects (higher up the value chain).	Impact: <b>high</b> Financial: <b>high</b>	<b>Impact: positive, potential</b> (medium and long-term outlook) Refers to the introduction of materials, technical and blue and green infrastruc-ture-based solutions into development pro-jects that support the adaptation of buildings to climate change. <b>Risk:</b> <ul style="list-style-type: none"><li>regulatory risk due to the lack of procedures for monitoring climate risk in the Group,</li><li>additional costs associated with the use of more resistant materials - using sustainable products for building construction.</li></ul> <b>Opportunity:</b> <ul style="list-style-type: none"><li>increasing the Group's competitiveness and achieving more points in building certification schemes such as BREEAM, thanks to the introduction of innovative solutions,</li><li>use of sustainable banking products to finance climate change measures.</li></ul>	The introduction of adaptive solutions in projects depends solely on the actions taken by the Group.	May result in an increase in the time needed for the design phase. Will result in modifications to internal standards, contracting system and qualification criteria for subcontractors and suppliers. Does not affect the strategy and business model, may affect the value chain: increases the scale of cooperation with suppliers of services and products related to adaptation solutions.	Such changes are intro-duced systematically due to increased interest from potential customers or clients, as well as increased regulatory requirements. The pace and scope of the changes being introduced is increasing, but the Group does not anticipate any major problems in adjust-ing. Changes in contracting are planned - primarily in the Group's requirements.	No significant financial outlay. Changes are implemented systematically, spreading the increase in expenditure over time. The Group has not estimated the financial impact of the issue in the future.



Theme and sub-theme	Location of significant impact, risk or opportunity	Relevance	Impact, risk or opportunity and time horizon	Relationship with people or the environment	Current and anticipated impacts	Response	Financial impact
ESRS E1 Climate Change. Climate change mitigation - Scope 1 and 2 GHG emissions	Design (higher up the value chain).	Impact: <b>high</b>	<b>Impact: negative, existing</b> (perspektywa short-term, medium-term, long-term). <ul style="list-style-type: none"><li>diesel-powered vehicle fleet,</li><li>operations in many offices, the generation of electricity and heat supplied to them is based on fossil fuels.</li></ul>	The Group has a large fleet of company cars, including diesel-powered ones, and in addition, operations are carried out in a number of offices, comprising the head office, local offices and sales and construction offices. The electricity they use comes from the grid. Given Polish conditions, this is high-carbon energy, derived mainly from fossil fuels.	The Group monitors the origin of the electricity used for its own needs and has assumed in its ESG strategy a complete shift away from fossil energy, through the purchase of RES-certified energy.	The Group monitors Scope 1 and 2 CO <sub>2</sub> emissions from 2023 onwards.	As the vast majority of electricity consumption for own consumption already comes from RES, the Group does not observe or expect higher costs for this energy in the future.
ESRS E1 Climate Change. Mitigation of climate change - taking action to reduce Scope 1 and 2 GHG emissions.	The Group's own operations - energy consumption for its own offices, as well as upstream in the value chain (extraction and processing, construction and design).	Impact: <b>very high</b> Financial: <b>high</b>	<b>Impact: negative, existing</b> (outlook: short-term, medium-term, long-term). Switching to RES electricity in own offices. <b>Risk:</b> <ul style="list-style-type: none"><li>additional costs associated with decarbonisation - including the need to invest in modern technologies that will minimise the environmental footprint and increase the efficiency of the construction process.</li></ul> <b>Opportunity:</b> <ul style="list-style-type: none"><li>strengthening its reputation as a responsible investor and easier access to capital.</li></ul>	The Group began counting and reporting emissions in 2023 and will adopt emissions reduction targets in 2025 - a decarbonization strategy. The Group is improving its Scope 1 and 2 emissions counting (and expanding Scope 3 counting), and is taking measures to reduce energy consumption in its own operations, in line with its sustainability strategy. Group's sole responsibility.	Taking action results in a reduction in the counterparties from which the Group buys electricity or certificates of origin, or a change in the distribution of energy purchased. In the future, it may result in receiving a better rating in the internal ratings of significant customers and counterparties. It does not affect the strategy, business model, value chain or decision-making process.	The Group contracts electricity mainly with source assurance from RES or with a certificate of origin. From 2024 onwards, the purchase of electricity for own use (own offices) is restricted to renewable energy only.	An analysis of the cost of purchasing electricity carried out in 2023 showed that purchasing green energy is less than 10 per cent more expensive than purchasing standard energy.



Theme and sub-theme	Location of significant impact, risk or opportunity	Relevance	Impact, risk or opportunity and time horizon	Relationship with people or the environment	Current and anticipated impacts	Response	Financial impact
ESRS E1 Climate Change. Climate change mitigation - GHG emissions from investments (scope 3)	Mining and processing of raw materials, construction and design (upstream of the value chain), in-house operations and use of finished buildings (downstream).	Impact: <b>high</b> Financial: <b>high</b>	<b>Impact: negative, existing</b> (outlook: short-term, medium-term, long-term). Scope 3 GHG emissions in the construction industry are by far the most important source of emissions. This is due to the high emissivity of sourcing and processing raw materials and the many years of use of buildings. <b>Risk:</b> <ul style="list-style-type: none"><li>increased costs due to the introduction of RES energy on construction sites.</li></ul>	The Group has analyzed selected buildings in 2024 with regard to greenhouse gas emissions and developed guidelines for their reduction for designers, construction and managers, which should translate into a reduction in the Group's environmental impact. Requiring changes is the Group's responsibility, the actual actions must be taken by subcontractors as a result of the Group's requirements.	Has the effect of restricting the use of certain products or suppliers that do not meet certain standards. Additionally increases internal data collection obligations. Does not affect the strategy, business model and value chain.	After measuring the reference buildings and developing guidelines for designers, builders and managers of finished buildings, the Group has made them available to stakeholders in the form of recommendations, and will transfer them to its standards and requirements in 2025, reinforcing the obligation to comply with them.	No significant expenditure. The Group has not estimated the financial impact of the issue in the future.
ESRS E1 Climate Change. Climate change mitigation - transition risks associated with regulations and policies	Higher up the value chain (construction, design) and in-house operations.	Financial: <b>high</b>	<b>Risk:</b> <ul style="list-style-type: none"><li>Increased costs associated with energy efficiency requirements: the need to bring buildings up to standards such as 'near-zero energy buildings' (NZEB), rising operating costs (e.g. building energy) and the production of building materials (e.g. cement, which has a high carbon footprint).</li></ul>	Any increased costs should result in positive environmental effects in the form of reduced energy demand (greenhouse gas savings)	Gradually increasing items in project budgets for energy efficiency solutions. Does not affect strategy, business model and value chain.	The Group's projects incorporate more and more solutions to improve their energy efficiency. However, this is primarily dictated by market standards and customer expectations.	The Group is unable to estimate the financial impact.



Theme and sub-theme	Location of significant impact, risk or opportunity	Relevance	Impact, risk or opportunity and time horizon	Relationship with people or the environment	Current and anticipated impacts	Response	Financial impact
ESRS E1 Climate Change. Energy - energy consumption in ready buildings	Design (upstream of the value chain), in-house operations and operation of finished buildings (downstream).	Impact: <b>very high</b> Financial: <b>high</b>	<b>Impact: negative, existing</b> (outlook: short-term, medium-term, long-term). From 2030 onwards, new buildings will have to have a low (zero) energy demand due to the materials and solutions used. The energy demand in the operation phase will have to be provided from renewable sources. <b>Risk:</b> <ul style="list-style-type: none"><li>excessive energy consumption may hinder access to capital and reduce competitiveness due to high building operating costs,</li><li>potential risk - provision of zero-carbon thermal energy for buildings will represent an increase in building maintenance costs.</li></ul> <b>Opportunity:</b> <ul style="list-style-type: none"><li>increase the share of RES energy in consumption and stabilize energy prices by investing in PPAs,</li><li>lower financing costs through the use of sustainable banking products.</li></ul>	The negative assessment is due to the fact that the energy loss problem cannot be completely avoided at this stage. The Group carried out an analysis of reference buildings for greenhouse gas emissions in 2024, on the basis of which guidelines for reducing emissions were created - to be implemented in the Group's processes. Group's sole responsibility.	Making buildings zero-carbon will not affect the strategy, it may affect the supply chain (increased purchasing of solutions and products that reduce energy consumption in buildings). The issue has not yet been thoroughly analyzed.	After measuring the reference buildings and developing guidelines for designers, builders and managers of finished buildings, the Group has made them available to stakeholders in the form of recommendations, and will transfer them to its standards and requirements in 2025, reinforcing the obligation to comply with them.	No significant expenditure. The Group has not estimated the financial impact of the issue in the future.



Theme and sub-theme	Location of significant impact, risk or opportunity	Relevance	Impact, risk or opportunity and time horizon	Relationship with people or the environment	Current and anticipated impacts	Response	Financial impact
ESRS E1 Climate Change. Energy - energy consumption in own operations and on construction sites	In-house operations, construction sites (higher up the value chain).	Financial: <b>high</b>	<b>Opportunity:</b> <ul style="list-style-type: none"><li>reduce operating costs by reducing electricity and fuel consumption on construction sites through the use of energy-efficient machinery and technology (short to medium term).</li></ul>	The Group carries out continuous monitoring of consumption. In its sustainability strategy, it has set out a timetable for the transition to renewable energy. The ability to act depends entirely on the Group and, to some extent, on the contractors on the construction sites (higher up the value chain).	Does not affect strategy, business model or value chain. The issue has little impact on purchasing decisions regarding energy or preferred technology solutions, but this is not expected to change the value chain.	The Group contracts electricity mainly with a RES source assurance or certificate of origin. From 2024 onwards, the Group purchases exclusively renewable electricity for its own needs and has also started to procure such energy at its own construction sites. When renovating or finishing offices for its own use, it introduces energy-efficient solutions.	Introducing energy-efficient solutions into one's own offices does not involve significantly higher costs, and these are primarily borne by the building owners. An analysis of the cost of purchasing electricity carried out in 2023 showed that purchasing green energy is less than 10 per cent more expensive than purchasing standard energy.
ESRS E1 Climate Change. Energy - the energy intensity of buildings throughout the investment process and use (LCA)	Mining and processing of raw materials, construction and design (upstream of the value chain), in-house operations and use of finished buildings (downstream).	Impact: <b>high</b>	<b>Impact: negative, existing</b> (outlook: medium-term, long-term). Energy intensity in the life cycle of buildings is crucial for a property developer because of the environmental impact. It results from the production of building materials, their processing and the long-term use of buildings. Legislation and industry practice require life cycle analyses (LCA) to be included in projects.	Energy intensity in the life cycle of buildings is crucial for a development company because of the environmental impact: the production of building materials and the use of buildings generate significant CO <sub>2</sub> emissions and energy consumption.	Making buildings zero-carbon will not affect the strategy, it may affect the supply chain (preferring service and product suppliers with a smaller carbon footprint). The issue has not yet been analyzed in detail.	The Group measured its own buildings (residential, office, rental flats) in terms of LCA in 2024. From the measurements, it obtained reference indicators and guidelines for building designers, construction and managers, compliance with which will strengthen energy efficiency ratios and reduce the carbon footprint (embedded and operational).	No significant expenditure. The Group has not estimated the financial impact of the issue in the future.



Theme and sub-theme	Location of significant impact, risk or opportunity	Relevance	Impact, risk or opportunity and time horizon	Relationship with people or the environment	Current and anticipated impacts	Response	Financial impact
ESRS E1 Climate Change. Energy - application of energy efficient solutions and product alternatives for commercial buildings	The entire value chain.	Impact: <b>very high</b> Financial: <b>high</b>	<b>Impact: positive, existing</b> (outlook: medium-term, long-term). Solutions that reduce the primary energy demand of buildings are taken into account at the design stage. All commercial buildings are certified to include such solutions. <b>Risk:</b> <ul style="list-style-type: none"><li>potentially unsuccessful tenders due to the selection of more energy-efficient solutions that require higher financial resources (short-term, medium-term and long-term perspective).</li></ul> <b>Opportunity:</b> <ul style="list-style-type: none"><li>optimisation of the Group's operating costs and the subsequent costs of building operation, through the use of energy-efficient solutions,</li><li>increase the Group's competitiveness among tenants by building to high energy efficiency standards.</li></ul>	The ability to act is entirely up to the Group, but is limited by technological possibilities.	Does not affect the strategy and business model, can affect the value chain: increases the scale of collaboration with service and product providers offering energy-efficient solutions and product alternatives for commercial buildings - influencing design and purchasing decisions.	Following the measurement of the reference buildings and the development of guidelines for designers, the Group has made them available to stakeholders in the form of recommendations and will transfer them to its standards and requirements in 2025, reinforcing the obligation to comply with them. The sustainability strategy specifies that all buildings constructed by the Group will be zero carbon (low carbon) by 2030.	No significant expenditure. The Group has not estimated the financial impact of the issue in the future.
ESRS E1 Climate Change. Energy - application of energy efficient solutions and product alternatives for residential buildings	The entire value chain.	Impact: <b>high</b> Financial: <b>high</b>	<b>Impact: negative, existing</b> (outlook: short-term, medium-term, long-term). Despite the implementation of solutions to reduce primary energy demand in buildings, the actual number of residential developments where these have been implemented is less than half. <b>Opportunity:</b> <ul style="list-style-type: none"><li>lower operating costs for housing.</li></ul>	Despite the implementation of solutions to reduce primary energy demand in residential buildings, the actual number of developments where these have been implemented is less than half. Therefore, the impact has been assessed as negative.	Does not affect the strategy and business model, can affect the value chain: increases the scale of collaboration with service and product providers offering energy-efficient solutions and product alternatives for housing - influence on design and purchasing decisions.	The Group carried out an LCA analysis of its own buildings (including residential) in 2024, from which it obtained guidelines for building designers, construction and managers, compliance with which improves energy efficiency.	No significant expenditure. The Group has not estimated the financial impact of the issue in the future.



Theme and sub-theme	Location of significant impact, risk or opportunity	Relevance	Impact, risk or opportunity and time horizon	Relationship with people or the environment	Current and anticipated impacts	Response	Financial impact
ESRS E3 Water and marine resources. Water - reducing consumption at the use stage of commercial premises	Design (in-house operations and upstream of the value chain), building operations (downstream).	Impact: <b>high</b>	<b>Impact: positive, existing</b> (outlook: medium-term, long-term). Echo Investment introduces water-reducing solutions in designed commercial buildings that contribute to reducing water consumption at the use stage, although the Group has no direct impact on end users.	Reducing water abstraction and consumption has an environmental impact.	Does not affect strategy, business model, value chain. May have a minor impact on purchasing decisions (preference for appliances and solutions that reduce water consumption).	The Group is introducing water-saving solutions (appropriate infrastructure), even though there is no direct impact on the operation of end-users. This is an opportunity to achieve savings for end-users of buildings.	No significant financial impact identified.
ESRS E4 Bio-diversity and ecosystems. Direct drivers of biodiversity loss - removal of trees from development sites	Design (in-house operations and upstream of the value chain), construction - site preparation by contractors (upstream) and use of finished buildings (downstream).	Impact: <b>high</b>	<b>Impact: negative, existing</b> (outlook: medium-term, long-term). The implementation of a significant proportion of development projects involves the removal of trees, resulting in reduced availability of plant and animal habitats and migration of species from neighbouring areas.	Most development projects involve the removal of trees, leading to a change in land use as green space is taken away for development. This results in reduced availability of plant and animal habitats and migration of species from neighbouring areas. It is therefore naturally disadvantageous. The Group's actions result in the felling of large and mature trees, sometimes of great importance to local ecosystems.	It does not affect the strategy, business model, value chain and decision-making process.	Voluntary compensation planting rates introduced from 2023. In addition, each year the Group expands the scope of the study of its impact on the condition of trees, in order to ensure the best possible compensation measures - planting. The Group has also introduced a guide for construction sites, which indicates the treatment of tree protection during the design and construction phases.	No significant financial impact identified.
ESRS E4 Bio-diversity and ecosystems. Direct drivers of biodiversity loss - planting and protection of existing woodlots	Green design (in-house operations and upstream of the value chain), construction - site preparation by contractors (upstream), in-house operations and use of finished buildings (downstream).	Impact: <b>very high</b>	<b>Impact: positive, existing</b> (outlook: medium-term, long-term). The Group has adopted in the ESG 2030 Strategy the objective of ensuring adequate replacement of removed trees. The Group is monitoring and working towards this target and taking a number of other steps to protect trees.	The growing awareness and increasing use of tools to protect trees is a result of the Group gradually tightening its requirements for planners and subcontractors, who are also partly responsible. The compensation measures assumed are the result of the sustainability strategy and are well above the minimum required.	It does not affect the strategy, business model, value chain and decision-making process.	Voluntary compensation planting rates introduced from 2023. In addition, each year the Group expands the scope of the study of its impact on the condition of trees, in order to ensure the best possible compensation measures - planting. The Group has also introduced a guide for construction sites, which indicates the treatment of tree protection during the design and construction phases.	No significant financial impact identified.



Theme and sub-theme	Location of significant impact, risk or opportunity	Relevance	Impact, risk or opportunity and time horizon	Relationship with people or the environment	Current and anticipated impacts	Response	Financial impact
ESRS E4 Bio-diversity and ecosystems. Direct drivers of biodiversity loss - planting of native species	Green space design and implementation of green space projects (higher up the value chain), in-house operations.	Impact: <b>very high</b>	<b>Impact: positive, existing</b> (outlook: medium-term, long-term). The Group carries out landscaping projects (greenery) within its own developments or on public land. It subcontracts greenery projects to professional entities.	The positive impact is due to the careful selection of planted plant and tree species by experts and the large number of plantings (in an urban environment).	It does not affect the strategy, business model, value chain and decision-making process.	When implementing plantings within the project area, the Group complies with current legislation and carries out a species assessment of the plantings so as not to introduce invasive alien species into the ecosystem. Each planting is analyzed by experts and an external dendrological valorisation takes place annually.	No significant financial impact identified.
ESRS E5 Circular economy. Waste - generation of waste	Upstream of the value chain (extraction and production of materials, construction process, design), in-house operations and the use stage (downstream).	Impact: <b>high</b>	<b>Impact: negative, existing</b> (outlook: short-term, medium-term, long-term). Construction activities are associated with the generation of a significant amount of waste, which occurs at the stage of site preparation as well as during project implementation.	The Group's construction activities are associated with the generation of a significant amount of waste. Waste arises at the stage of demolition of buildings during site preparation and during project implementation.	It does not affect the strategy, business model, value chain and decision-making process.	The Group has implemented a waste segregation system on construction sites that is ahead of legislative requirements.	No significant financial impact identified.
ESRS E5 Circular economy. Waste - segregation of waste on site	Contractors on construction sites (higher up the value chain).	Impact: <b>high</b>	<b>Impact: positive, existing</b> (outlook: medium-term, long-term). The Group introduced compulsory waste segregation on construction sites well before the legal requirements were introduced. However, the information held is general, making it necessary to refine the data collection process.	The main source of waste (analyzed by the Group) is the operations carried out by contractors on construction sites. Improvements in segregation results from the Group's tightening requirements and the provision of support to contractors - including know-how.	Tightening criteria and expectations of contractors may result in the abandonment of cooperation with those who are not able to meet the requirements. It does not affect the strategy, business model and value chain.	Action implemented at Echo Investment from 2021, at Archicom from 2023. The group is gradually increasing requirements.	No significant financial impact identified.



Theme and sub-theme	Location of significant impact, risk or opportunity	Relevance	Impact, risk or opportunity and time horizon	Relationship with people or the environment	Current and anticipated impacts	Response	Financial impact
ESRS E5 Circular economy. Input resources, including resource use	In-house operations, Extraction and processing of raw materials and on-site contractors (upstream in the value chain).	Impact: <b>high</b>	<b>Impact: negative, existing</b> (outlook: short-term, medium-term, long-term). The construction of buildings consumes large quantities of materials and natural resources, including steel, concrete, other materials and raw materials of natural and synthetic origin. The materials and raw materials used come mainly from Europe, but some also come from Asia.	The construction of buildings and major infrastructure projects consumes large quantities of materials and natural resources, including steel, concrete and other materials and raw materials of natural and synthetic origin. The materials and raw materials used in the construction process are largely sourced from Europe, but some also come from Asia.	The need for reliable, accurate systems for monitoring.	Work to improve the functioning of the system for monitoring waste consumption.	No significant financial impact identified.
ESRS S1 Own staff. Working conditions - long term job stability	Own operations.	Impact: <b>very high</b>	<b>Impact: positive, existing</b> (outlook: short-term, medium-term). The Group offers stable employment mainly on permanent contracts and has a long average length of service compared to the industry.	It results from a deliberate action by the Group and concerns its own employees. The Group offers stable employment mainly on permanent employment contracts.	The stability of the workforce provides the Group with the resources to run its business, retaining core competencies within the Group. The availability of suitably qualified staff determines the ability to implement the strategy and consequently affects the business model. It does not affect the value chain.	No changes planned.	No significant financial impact identified.
ESRS S1 Own employees. Working conditions - engaging in dialogue with employees	Own operations.	Impact: <b>high</b>	<b>Impact: positive, existing</b> (outlook: short-term, medium-term). There are employee representatives in the Group, ongoing communication by the Management Board with employees and employee opinion surveys.	Resulting from a deliberate action by the Group, it concerns the Group's own employees.	Does not affect strategy, business model, value chain. May affect decision-making on employee issues.	Resulting from the Group's values and long-standing approach to employee management. No planned changes.	No significant financial impact identified.



Theme and sub-theme	Location of significant impact, risk or opportunity	Relevance	Impact, risk or opportunity and time horizon	Relationship with people or the environment	Current and anticipated impacts	Response	Financial impact
ESRS S1 Own employees. Working conditions - work-life balance	Own operations.	Impact: <b>high</b>	<b>Impact: positive, existing</b> (outlook: short-term, medium-term). The Group has adopted the goal of strengthening employee wellbeing in the ESG 2030 Strategy and is working to improve the balance between personal life and work. However, the way work is organised, the distribution of responsibilities and the number of employees in relation to the organisation's tasks are of key importance.	The Group analyzes employee feedback on an ongoing basis. In this way, it reduces, among other things, the risk of illnesses (including - those with a psychological basis) in employees.	It does not affect the strategy, business model, value chain and decision-making process.	Resulting from the Group's values and long-standing approach to employee management. No planned changes. The Group seeks to respond on an ongoing basis (where possible) to signals from employees regarding their wellbeing.	No significant financial impact identified.
ESRS S1 Own employees. Equal treatment and equal opportunities - low diversity in management and supervisory positions	Own operations (and ownership activities).	Impact: <b>very high</b>	<b>Impact: negative, existing</b> (outlook: short-term, medium-term). The bodies of Echo Investment S.A. and Archicom S.A. are characterised by underrepresented women. The Group has declared to improve the gender balance by mid-2026.	The ability to act (change the composition of the bodies) is partly outside the Group and belongs to the shareholders. The Group supports and encourages them to increase diversity - among other things through the tenets of its sustainability strategy.	It does not affect the strategy, business model, value chain and decision-making process.	In line with the Group's sustainability strategy, by mid-2026, women will make up a minimum of 40 percent of the boards of each Company or a minimum of 33 percent of the combined board and management of each of the Group's main companies.	No significant financial impact identified.
ESRS S1 Own workers. Equal treatment and equal opportunities - training and skills development	Own operations.	Impact: <b>high</b>	<b>Impact: positive, existing</b> (outlook: medium-term). The Group offers training and annual development talks to employees and those in its own ranks.	The Group invests in the development of its own employees and pays particular attention to safety and building a culture of cooperation.	The training policy directly affects the quality of staff, which is one of the key resources for implementing the Group's strategy in a specific business model. It does not affect the value chain.	It stems from the Group's values and long-standing approach to employee management. Any changes in approach will be driven by the Group's current business needs.	No significant financial impact identified.



Theme and sub-theme	Location of significant impact, risk or opportunity	Relevance	Impact, risk or opportunity and time horizon	Relationship with people or the environment	Current and anticipated impacts	Response	Financial impact
ESRS S1 Own employees. Equal treatment and equal opportunities - measures to prevent violence and harassment at work	Own operations.	Impact: <b>very high</b>	<b>Impact: positive, existing</b> (outlook: short-term, medium-term). The Group has a functioning whistleblowing system, including the ability to report violence and harassment in the workplace.	Refers to the employees' own resources.	It does not affect the strategy, business model, value chain and decision-making process.	It stems from the Group's values and long-standing approach to employee management. The whistleblowing procedure was updated in 2024, making it easier for employees and other stakeholders to report undesirable behaviour. In 2024, the Code of Conduct on strengthening labour and human rights was updated, taking into account international standards and guidelines. No significant changes planned.	No significant financial impact identified.
ESRS S2 Workers in the value chain. Occupational health and safety - health and life risks for workers on site	Extraction and processing of raw materials and contractors on construction sites (higher level of the value chain).	Impact: <b>high</b> Financial: <b>high</b>	<b>Impact: negative, potential</b> (outlook: short-term, medium-term). The construction industry is characterised by a high accident rate because it is not possible to eliminate health and safety risks. The consequences of accidents are impossible or very difficult to reverse. <b>Risk:</b> <ul style="list-style-type: none"><li>loss of reputation and lawsuits related to non-compliance with human and labour rights.</li></ul>	It mainly concerns employees of subcontractors on construction sites, as well as a certain group of own employees who work on construction sites.	Does not affect the strategy and business model. Influences the value chain and decision-making process. To ensure adequately high health and safety standards on construction sites, the Group invests in its own health and safety supervisory teams and training of contractors' employees. The level of health and safety culture is also an element in the qualification of contractors for the Group's tenders. A level that is too low may result in the exclusion of the contractor concerned.	Resulting from the Group's values and long-standing approach to managing employees on site. No major changes planned, except for regular process improvements and updates.	The significant financial impact when an accident occurs depends on its scale and circumstances. According to the 2022 report by Ayming Polska and the Business Centre Club, a severe accident at work costs a company an average of PLN 1.2 million (compensation, production downtime, replacements, administrative penalties).



Theme and sub-theme	Location of significant impact, risk or opportunity	Relevance	Impact, risk or opportunity and time horizon	Relationship with people or the environment	Current and anticipated impacts	Response	Financial impact
ESRS S2 Workers in the value chain. Occupational health and safety - a well-functioning health and safety system	Extraction and processing of raw materials and contractors on construction sites (higher level of the value chain).	Impact: <b>very high</b>	<b>Impact: positive, existing</b> (outlook: short-term, medium-term). The Group's construction health and safety management system is ISO 45001 compliant and includes the ability to report hazards, verify notifications and make improvements, exchange information, training, etc. <b>Opportunity:</b> <ul style="list-style-type: none"><li>obtaining safety certifications may contribute to winning more tenders and easier access to capital.</li></ul>	It mainly concerns employees of subcontractors on construction sites, as well as a certain group of own employees who work on construction sites.	It does not affect the strategy, the business model, it is taken into account in the value chain and decision-making process - primarily in terms of qualifications to work with specific subcontractors.	Resulting from a long-standing approach to managing worker safety on site. ISO 45001-compliant health and safety management system introduced at Archicom in 2024. Systematic development of the health and safety management system planned.	No significant financial impact identified.
ESRS S3 Affected Communities. Economic, social and cultural rights of communities - urbanism	Design (upstream of the value chain), management of the finished buildings and their use (downstream).	Impact: <b>high</b>	<b>Impact: positive, existing</b> (outlook: medium-term, long-term). The Group bases its strategy on building large, mixed-use projects that provide access to key urban services and infrastructure. This is also an important element of the ESG strategy.	The construction of large-scale, urban, mixed-use projects has a positive impact on the shaping of cities and the living conditions of their inhabitants.	The issue is part of the business strategy. It affects the business model, the value chain and the decision-making process. It requires the availability of suitable plots of land (large, located in the city, with adequate infrastructure or the possibility to build it), and it requires more experienced design and construction companies with greater financial, personal and intellectual potential.	In line with the Group's sustainability strategy, city-building projects (so-called "destination" projects) will make up around 50 per cent of the project portfolio from 2023 onwards.	No significant financial impact identified.
ESRS S4 Consumers and end-users. Personal security of consumers or end-users - creating secure spaces	In-house operations and use of finished buildings (lower end of the value chain).	Impact: <b>very high</b>	<b>Impact: positive, existing</b> (outlook: medium-term, long-term). The Group creates safe spaces (buildings and their surroundings) by, among other things, ensuring adequate ventilation, air quality, thermal, visual and acoustic comfort (inside buildings) or proper lighting or the absence of disturbance on traffic routes (outside).	Influences the safety of human use of the space.	It does not affect the strategy, business model, value chain and decision-making process.	It stems from the Group's values and long-standing approach to managing it.	No significant financial impact identified.



Theme and sub-theme	Location of significant impact, risk or opportunity	Relevance	Impact, risk or opportunity and time horizon	Relationship with people or the environment	Current and anticipated impacts	Response	Financial impact
ESRS S4 Consumers and end-users. Inclusion of consumers or end-users - creating inclusive spaces	In-house operations and the management and use of finished buildings (lower end of the value chain).	Impact: <b>high</b>	<b>Impact: positive, existing</b> (outlook: medium-term, long-term). The Group is incorporating more and more solutions in the projects to make the space easier to use for people with special needs (people with disabilities, prams, children, bicycles, etc.).	Influences the safety of human use of the space.	The issue is part of the business strategy. It does not affect the business model, value chain or decision-making process.	It stems from the Group's values and long-standing approach to managing it.	No significant financial impact identified.
ESRS S4 Consumers and end-users. Social inclusion of consumers or end-users - use of unfair selling practices	Intermediary sales and use of finished buildings (lower end of the value chain).	Impact: <b>high</b>	<b>Impact: negative, potential</b> (outlook: short-term, medium-term, long-term). Residential sales are at risk of unfair sales practices due to the inequality (information, access to expertise) between seller and buyer.	It arises solely from the Group's own operations and is highly regulated in the property industry, limiting the potential for negative impact.	It does not affect the strategy, business model, value chain or decision-making process. The Group complies with all regulations and good practices in this regard.	It stems from the Group's values and long-standing approach to managing it.	No significant financial impact identified, thanks to the expertise of its own employees and years of experience to avoid fraudulent marketing activities.
ESRS G1 Conduct of Business. Protecting whistleblowers - a transparent whistleblowing system	Design and construction (upstream of the value chain), in-house operations and brokerage, leasing, and building management (downstream).	Impact: <b>high</b>	<b>Impact: positive, existing</b> (outlook: short-term, medium-term, long-term). The Group has a functioning whistleblowing system, including the possibility to report undesirable situations - also anonymously.	The Group ensures that reporting channels that are accessible to people from its own staff resources, as well as to other stakeholders, are in operation. The Group provides an external reporting channel that allows for anonymity.	It does not affect the strategy, business model, value chain and decision-making process.	It stems from the Group's values and long-standing approach to employee management. The whistleblowing procedure was updated in 2024, making it easier for employees and other stakeholders to report undesirable behaviour. In 2024, the Code of Conduct on strengthening labour and human rights was updated, taking into account international standards and guidelines. No significant changes planned.	No significant financial impact identified.



Theme and sub-theme	Location of significant impact, risk or opportunity	Relevance	Impact, risk or opportunity and time horizon	Relationship with people or the environment	Current and anticipated impacts	Response	Financial impact
ESRS G1 Conduct of Business. Corruption and bribes - implementing an anti-corruption policy	In-house operations (the organisation's operations) and the operations of the external entity supporting the Group in these matters (higher up the value chain).	Impact: <b>very high</b>	<b>Impact: positive, existing</b> (outlook: short-term, medium-term, long-term). The Group has anti-corruption and business partner policies and procedures in place. It requires employees to be aware of them, promotes them and enforces them. In 2024, no cases of corruption or suspected corruption were identified in the Group.	The provision of procedures and a system against corruption and bribery protects employees from the negative consequences of breaking the rules in this area.	Transparent business conduct is an essential condition for property development companies, which by the nature of their business must work closely with public authorities, which requires mutual respect and trust. Corruption incidents can shatter this trust, causing great difficulties in the preparation of projects at the administrative stage.	It stems from the Group's values and long-standing approach to managing it. No planned changes.	No significant financial impact identified.
ESRS G1 Doing Business. Managing supplier relationships, including payment practices	In-house operations, Extraction and processing of raw materials and on-site contractors (upstream in the value chain).	Impact: <b>high</b>	<b>Impact: negative, potential</b> (outlook: short-term, medium-term, long-term). The Group does not have procedures for payment practices and the system in place is based on the knowledge and experience of the staff responsible for this area. The Group regularly checks the status of outstanding invoices.	In the Group, there is no official procedure related to payment practices, they are based on the knowledge and practice of individual teams, in addition to the cyclical report of the statement of outstanding invoices. This state of affairs affects relationships with partners and the associated risks.	The need to work to ensure that procedures and systems related to payment practices are in place, safeguarding employees from the negative consequences of breaking the rules in this area.	Reporting and monitoring of related disclosures, response when irregularities are detected.	No significant financial impact identified.
ESRS G1 Conduct of Business. Other - Cyber security	Own operations	Financial: <b>high</b>	<b>Risk:</b> <ul style="list-style-type: none"><li>Risk of unauthorised access to data from inside and outside the organisation potentially leaking confidential company data</li></ul>	Risks related to unauthorised access to data from inside and outside the organisation that may cause leakage of confidential company data	It does not affect the strategy, business model, value chain or decision-making process. The Group complies with all regulations and good practices in this regard.	Reporting and monitoring of related disclosures, response when irregularities are detected.	No significant financial impact identified.



# Double materiality

IRO-1, IRO-1 related to E1, E2, E3, E4, E5 i G1

The group conducted a double materiality assessment (DMA) for the first time for the 2023 sustainability report. The process took place between September and December 2023, in accordance with the European Sustainability Reporting Standards (ESRS), and aimed to identify, assess, and prioritize key impacts, risks, and opportunities (IRO): environmental, social, and corporate governance-related. It was conducted simultaneously for the Echo Investment Group and for the Archicom Group, as a separate entity. The Group's advisor, Deloitte, participated in the process. The scores awarded during the process were used both to identify important topics and to set priorities.

## The analysis focused on assessing the impacts, risks, and opportunities from two perspectives:

- **materiality of impact** — the impact of activities on society and the environment; and
- **financial materiality** — the impact of sustainability factors on the Group's financial performance.

The analysis was structured, in particular, based on the identification of impacts, risks, and opportunities in the Group's own operations, and along the Group's value chain (in relation to operations, where there is an increased risk of adverse effects), taking into account:

- activities in the value chain at a higher level (so-called upstream), e.g. the extraction of raw materials, processing of raw materials, and the production of building materials;



- own operations;
- activities in the value chain at a lower level (so-called downstream activities), e.g. the use of residential premises (Archicom), use of office and service buildings (Echo Investment), and the demolition phase.

## The Group's relevant activities, resources, and relationships in the following areas have been analyzed in detail:

### Own operations

- own employee resources, described in detail in the S1 disclosures in chapter 3 of the report,

### Higher level of the value chain

- construction companies that carry out work on behalf of the Group, including securing key materials and equipment needed for construction;

- capital providers: banks and bondholders;
- entities from which the Group acquires plots of land for projects.

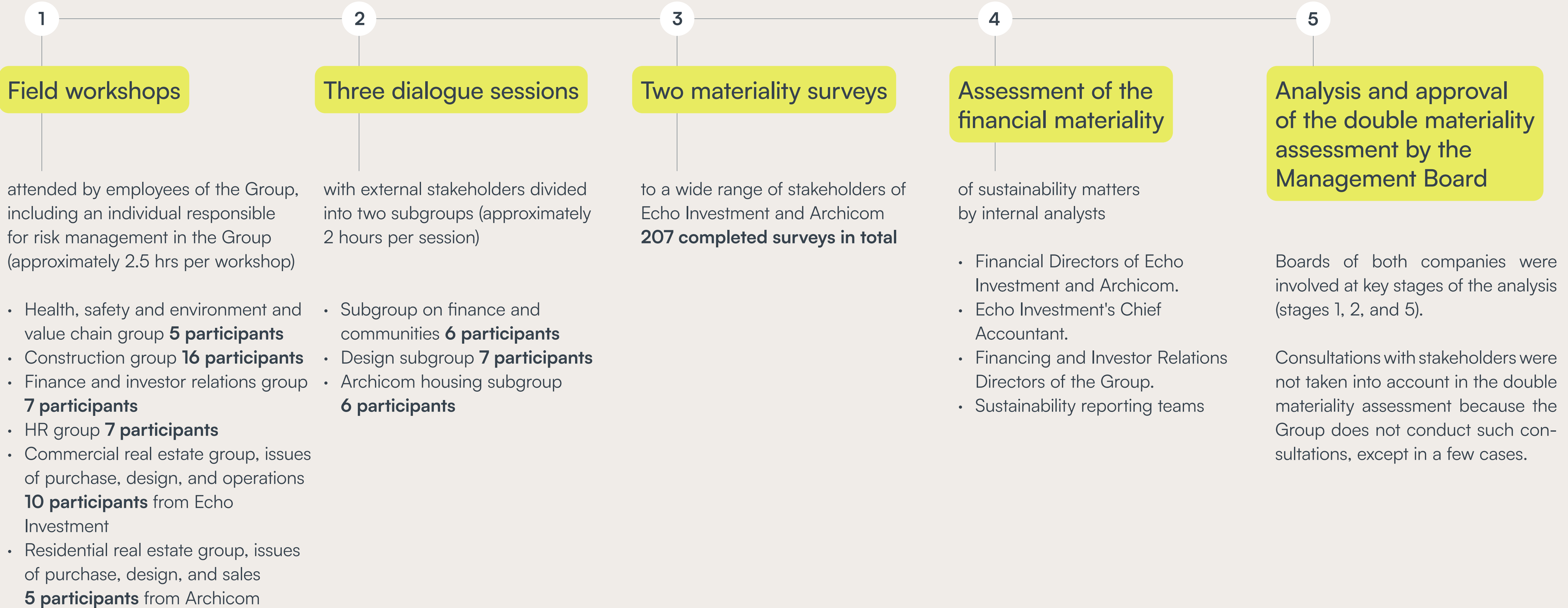
### Lower level of the value chain

- tenants of office space and buyers of flats;
- buyers of completed commercial buildings constructed by the Group.

The above-mentioned resources and relationships have been considered significant due to their direct impact on the Group's value chain, the high degree of difficulty in replacing them, and the scale of the necessary cooperation. The above-mentioned significant resources and relationships mainly concern Poland.



# Survey tools and ways of engaging stakeholders





# Stages of the double materiality assessment



## 1. Understanding the context

The first phase of assessing double materiality involved understanding the external and internal context in which the Group operates. This stage involved members of the Echo Investment and Archicom working group, advisors from Deloitte, and members of the relevant subject matter teams.

The work began with a comprehensive analysis of industry trends and the regulatory framework affecting sustainability issues in the construction and development industry (review of reports and analyses published by industry associations, regulations, and good practices). This provided insight into the current expectations of regulators and other stakeholders, as well as the potential risks and opportunities identified in the sector. This helped to focus the assessment on issues most relevant to the industry, which were assigned to specific ESRS topics and subtopics.

In the next step, the reporting boundaries were defined in such a way that the scope of the double materiality assessment included all key aspects of the business, focusing in particular on activities in the property development sector, which plays a significant role in environmental and social impact.

In the third step, a value chain diagram was developed that takes into account the entities that supply products or services in the field of raw material extraction, up to the end users. The starting point for the analysis was the strategy, business model, geographical location of suppliers, and relationships with the Group's customers and partners. The scope of the Group's responsibility, opportunities for influence, and a comparison of the scope of sustainability reporting with the scope and structure of financial reporting were taken into account. The scope of reporting for the value chain was defined, focusing primarily on contractors on construction sites. This step ensured that the analysis covered all key aspects of the development business and key aspects related to impact.

The final step in this phase was to develop a strategy for engaging stakeholders, starting with the identification thereof by the project team, agreeing on the approach to their engagement (meetings, surveys, social media) and ways of obtaining input from them (assessments) in connection with a long list of impacts, risks and opportunities.

The criteria for selecting stakeholders were qualitative: the focus was on relationships that were considered long-term, the availability of stakeholders, and their knowledge of the Group's business. Once the initial list of influences, risks, and opportunities was known, specific stakeholder groups were selected that would be able to contribute to the initial identification of significant influences, risks, and opportunities.



## 2. Identification of impacts, risks and opportunities (IRO)

The Group identified the impacts, risks and opportunities related to environmental, social, and governance issues based on the following sources:

- regulations, industry trends, and internal policies;
- the expertise of the project team;
- value chain analysis;
- information from dialogue with internal stakeholders.

The process began with the creation of a long list of influences, risks, and opportunities (see stage 1 above). Then, internal experts were invited to conduct a more in-depth analysis. These experts have close relationships with specific stakeholder groups related to the value chain (customers, contractors, and their employees and suppliers) as part of their job responsibilities or the nature of their tasks, and have insight into their opinions, expectations, and demands (see the section "Survey tools and ways of engaging stakeholders" above). In this phase, reports of irregularities were also analyzed and internal staff resources were involved (especially in the context of human and labor rights).

The involvement of external stakeholders in the assessment of the long list of influences, risks, and opportunities consisted of a survey addressed to a wide range of stakeholders and dialogue sessions. The assessment also took into account dendrological

analyses of the Group's tree felling and planting activities. Information on the individual stakeholder groups with which the Group consulted, how they were involved, and how their opinions were taken into account in the double materiality assessment can be found in the table "Key Stakeholders of the Group" in the SBM-2 disclosure above.

In this phase, the environment was considered a key stakeholder.

The collected opinions of internal and external stakeholders set the direction for building a long list of IROs and were taken into account in the assessment of impacts, risks and opportunities (scoring). Considering the final results of the significance survey, there is a high degree of convergence between the topics indicated as significant by stakeholders and the indications of organizations and expert working groups

## 3. Materiality assesment

A team of internal experts assessed the financial materiality and impact materiality of the previously identified sustainability issues as well as the Group's impact on people and the environment based on the due diligence process. This step helped to determine the relationship between impacts, risks, and opportunities, which allowed for the proper direction of further strategic actions in the area of sustainable development, and was the basis for selecting ESRS topics and subtopics considered relevant to the Group.

### The assessment of the significance of the impact

was carried out using qualitative and quantitative criteria. The previously developed long list of impacts, risks, and opportunities was the subject of the assessment.

The assessment included the following parameters and measures:

- scale of impact (significance);
- scope of impact (dispersion);
- irreversibility;
- probability of occurrence;
- time horizon;
- type of impact (actual, potential) and the nature thereof (positive and negative).

Setting time horizons for the assessment allowed for both short-term and long-term impacts, risks, and opportunities to be considered. The defined time frame included the following perspectives:

- short-term (up to 1 year);
- medium-term (1-5 years);
- long-term (over 5 years).

Significance in more than one time horizon was determined only for selected impacts, risks, and opportunities.

In the case of human rights, the approach recommended by the ESRS guidelines was used to assess the significance of the impact, giving priority to severity over probability in the case of possible negative impacts.



### The assessment of financial significance

a qualitative approach to risk and opportunity assessment was used, based on available internal historical data where possible. An assessment was made of how sustainability risks and opportunities could affect the Group's financial performance over time, taking into account both negative and positive impacts.

#### The criteria assessed included:

- impact on the Group's growth (expansion);
- impact on the financial situation;
- impact on cash flow;
- impact on access to and cost of capital;
- likelihood of materialization.

Both the impact assessment and the financial assessment used a scale from 1 to 5 (where 5 means the highest significance). As a result, each sustainability topic could be assigned one of the following impact categories: very high, high, medium, low, and none. Sustainability topics were considered relevant for the Group if they scored above 3.5 for impact and 3 for financial evaluation. The materiality threshold was defined by the sustainability team and approved by the Management Boards of both companies. As a result of this process, the Group developed a materiality matrix and defined relevant topics. The result of this process is presented in the SBM-3 disclosure.

The result of this stage of work was a shortlist of impacts, risks, and opportunities considered significant as a result of the double materiality assessment. The list of non-material topics is presented in "Appendix 1. Index of data points resulting from EU regulations." The topics were categorized as non-essential as a result of the double materiality assessment described in detail in this section.

### Level of disaggregation

Inflows, risks, and opportunities of a different nature were not aggregated: aggregation concerned the same topic/subtopic and the issue specific to the Echo Investment Group or Archicom. Since both companies operate exclusively in Poland and in the same industry, and the individual locations of their operations (offices or construction sites) do not differ significantly, no need for further disaggregation was identified. The level of aggregation adopted did not obscure the specifics and context necessary for the interpretation of the information.

The risks and opportunities were assessed in close connection with the identified impacts. Each impact was analyzed for the risks and opportunities associated with it.





## 4. Summary

The significant impacts, risks, and opportunities evaluated in the previous step were consolidated into a final document. Each sustainability impact, risk, and opportunity were assigned the obtained rating and the relevant ESRS topic (subtopic).

The document prepared in this way was discussed at a workshop with the Group's Management Board, then approved by the Management Boards of Echo Investment and Archicom and presented to the Supervisory Boards.

Detailed information on, among other things, the identified groups of relevant stakeholders, the manner of their engagement, the methods of cooperation, and the consideration of the results of cooperation, the Group presented in disclosure SBM-2 "Key Stakeholders of the Group". Detailed information on the identified material topics resulting from the double materiality assessment, as well as their effects (including financial effects) and impact on the strategy, business model, and value chain, are presented in disclosure SBM-3 "Material Topics for the Group."

### Review and update of the double materiality assessment

In September and October 2024, the Group conducted a review and update of the assessment, which focused on:

- clarifying the reporting boundaries;
- clarifying the time horizons at the level of individual IROs;
- clarifying the presence of individual impacts, risks and

opportunities within the Group's own operations or individual elements of the value chain;

- confirmation with representatives of the Management Boards that there are no new internal and external factors that could affect the list of influences, risks, and opportunities, as well as and the scale of their assessment;
- other issues based on the recommendations of the external consulting firm KPMG, e.g. updating the description of the value chain, clarifying the location of influences, risks, and opportunities in the value chain.

The 2023 and 2024 analyses provided key insights into the sustainability risks and opportunities facing the Group. The findings of these analysis are gradually being integrated into the Group's sustainability strategy and reporting framework, ensuring that both the social, and financial implications of environmental, social and governance activities are properly considered.

In the process, the Group primarily relied on its own historical data and industry data.

The double materiality assessment process outlined above was carried out at the Group for the first time. The Group plans to review the double materiality assessment in 2025.

### Compliance with the Group's internal risk management system

The Group has carried out a detailed risk identification and assessment and impact analysis using a risk management process and a double materiality assessment. This process is not formally integrated into the internal risk, management system; however, the key person responsible for the risk management system actively participated in selected stages of the impact, risk and opportunity assessment, which allowed for consistency between this process and the general risk management procedures. This supervision also ensured the complementarity of the processes.

The process of identifying, assessing, and managing impacts and risks is gradually being integrated into the Group's overall risk management process. The Group has reviewed the register of general risks. The sustainability risk assessment process was carried out using a similar methodology and tools to the analysis of the Group's overall risk profile and its risk management processes.

The Group identified the need to link the sustainability impact, risk, and opportunity assessment methodologies to the comprehensive corporate risk assessment.



**IRO-1 related to E1**

The process for identifying and assessing climate-related impacts, risks, and opportunities is described in disclosure IRO-1 above. The conducted analysis was based on the knowledge and experience of individuals involved in the process, mainly those from the Group's own workforce.

The process took into account the issues of impact on climate change, in particular greenhouse gas emissions within the Group's own operations and in the value chain.



In identifying and assessing impacts, risks, and opportunities related to climate in own operations and in its value chain, the Group did not consider high-emission climate scenarios or perform a comprehensive assessment of the degree to which its assets and business activities may be exposed and are sensitive to those climate-related hazards posing a severe physical risk for the Group. When assessing the physical climate-related risks and opportunities in its own operations and throughout its value chain, the Group did not consider any climate scenarios and did not assess the extent to which its assets and economic activities may be exposed to climate transition events. Nevertheless, the list of identified impacts, risks and opportunities in the double materiality assessment includes physical and transition risks. The Group intends to subject this issue to a comprehensive assessment during the double materiality assessment planned for 2025.

The analysis equally covered all of the Group's locations (sites of development projects), as their characteristics and impact on climate change issues are similar across all locations. A detailed review of the Group's own resources and activities in this regard was not justified.

**IRO-1 related to E2**

The topic of pollution was deemed immaterial as a result of the double materiality assessment. However, the Group has presented selected information on this subject in disclosure E5 — Resource use and circular economy.

The process of identifying material impacts, risks, and opportunities in relation to disclosure E2 — Pollution, has been described in disclosure IRO-1 above: "Double materiality." The Group has not conducted a review of its own locations in this regard.

The Group has not identified any affected communities in this area and, therefore, has not conducted consultations with them.

**IRO-1 related to E3**

The process for identifying and assessing water and marine resources-related impacts, risks, and opportunities is described in disclosure IRO-1 above. The conducted analysis was primarily based on the knowledge and experience of individuals involved in the process, mainly those from the Group's own workforce. As a result of the analysis, the Group identified water as a material subtopic, including the consumption of surface and groundwater. The subtopic of marine resources was deemed immaterial due to the limited scale of marine-derived construction material sourcing in Poland, the lack of identified use within the Group's value chain, the economic infeasibility of such activities, strict environmental regulations, the Group's limited operations near the coastline, and the absence of other identified potential impacts on marine resources.



The materiality assessment of the water topic equally covered all of the Group's locations (primarily construction sites and own offices), as water is an equally significant issue for the Group's own operations and its value chain at both higher and lower levels.

The Group did not consult with affected communities on water and marine resources.

#### IRO-1 related to E4

The description of the process for identifying and assessing impacts, risks, and opportunities related to biodiversity and ecosystems is provided in disclosure IRO-1 above. The analysis equally covered all of the Group's locations (sites of development projects), as their characteristics and impact on biodiversity and ecosystem issues are similar across all locations. A detailed review of the Group's own resources and activities was conducted only in relation to development projects carried out in sensitive areas or in direct vicinity. In other areas it was not justified. The analysis was primarily based on the knowledge and experience of individuals involved in the process, mainly those from the Group's own workforce.

In the scope of E4, the Group has identified actual impacts: a negative impact (tree removal from investment areas) and positive impacts (tree planting, protection of existing greenery, and planting of native species). The potential impacts were not identified.

The Group did not identify dependencies on biodiversity and ecosystems and related ecosystem services at its own locations and in the upstream and downstream value chain, using the assessment criteria described above in the information on the conducted double materiality assessment.

The Group did not conduct an in-depth analysis of the risks and opportunities of the transition, and the physical risks and opportunities related to biodiversity and ecosystems, however it identified and assessed them. The analysis also considered systemic risks, but no such material risks were identified.

The Group did not consult with affected communities on the sustainability assessment of shared biological resources and ecosystems because it did not identify such resources.

The Group did not use a scenario analysis for biodiversity and ecosystems to identify and assess relevant risks and opportunities in the short, medium, and long term.

In the portfolio of investments realized in 2024, the Group identified one that was being developed in areas sensitive in terms of biodiversity — Sady nad Zieloną na Księżu Wielkim in Wrocław. The investment borders the Oława causeway, which separates it from the Natura 2000 area, a special area of conservation of the Grądy in the Odra Valley (PLH020017) with the Zielona (Szalona) River. The investment area is approximately 3 ha. Its realization by Archicom is associated with additional obligations to minimize

negative impacts on the environment, including biodiversity. Thanks to this, Archicom's activities did not negatively affect the neighboring Natura 2000 area, did not deteriorate the condition of natural habitats or species habitats, and did not disturb species for which the protected area was designated.

#### IRO-1 related to E5

The description of the process for identifying and assessing impacts, risks, and opportunities related to resource use and circular economy is provided in disclosure IRO-1 above. The analysis equally covered all of the Group's locations (sites of development projects), as their characteristics and impact on those issues are similar across all locations. It was primarily based on the knowledge and experience of individuals involved in the process, mainly those from the Group's own workforce.

Waste generation and waste segregation on construction sites were identified as relevant issues in this area. The issue is relevant to all of the Group's construction sites (i.e. in the Group's supply chain), regardless of their location. They all have a similar level of significance and are all subject to the same requirements by the Group, including reporting obligations with regard to the use of resources. For this reason, a detailed review of the Group's own resources and activities is not justified.

The Group has not conducted consultations regarding circular economy, in particular, with the affected communities.



The Group also recognized the topic of input resources as an important issue in the area of resource use, but is using a deferral in this regard (the topic primarily concerns the upper value chain – tier 2).

**IRO-1 related to GI**

With regard to business conduct issues, the Group has identified the following transactions and processes as particularly relevant:

- the sale of apartments to individual customers;
- obtaining administrative decisions (cooperation with local authorities);
- the sale of commercial properties and other significant assets (high-value transactions, in which the counterparties are usually international funds and investment companies from all over the world);
- the rental of office and commercial space (to retail chains, Polish and foreign companies, restaurants, etc.);
- the purchase of construction services.

Due to the specific nature of the Group's business, all the transactions and activities mentioned are carried out in Poland and in accordance with Polish law (concerning real estate located in Poland).

With regard to issues related to business conduct, the Group has identified cybersecurity as an important issue, which primarily covers the security of customer data as well as company data.

This topic is reported in disclosures S4: S4-1 (policies), S4-3 (processes to address adverse impacts) and S4-4 (actions). The Group has not set any targets in this regard.

**IRO-2****Disclosure requirements**

This 2024 Sustainability Report of Echo Investment Group complies with disclosure requirements for the sustainability statement, specified in the ESRS.

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

The Group has determined the material information to be disclosed based on an analysis of the issues identified by stakeholders as material, as well as on the knowledge and experience of its own employees, who identified key areas of information during area-specific workshops (see the table in the IRO-1 disclosure above). After determining the key areas of interest to stakeholders, the Group selected a set of information (metrics) that best describe the areas of interest to stakeholders and are available within the Group.





2

For the Planet



## For the Planet

We believe in the idea of sustainable urban development. We strive to ensure that our projects are built in already urbanized areas that have adequate infrastructure and provide for the comfort of functioning in the city. We strive to ensure that our investments do not degrade the environment, including biodiversity in the surrounding areas.

We have started the process of reducing CO<sub>2</sub> emissions in our work offices, as well as in projects we build, so in 2030 they will be carbon-neutral in operation. We promote renewable energy, using it both for our own needs and in buildings used by others. In pursuing our energy and climate goals, we follow a phased roadmap guiding the Group towards decarbonization, zero-emission buildings, further increasing the role of greenery in our projects, and supporting the sustainable development of cities.



### Our ambitions by 2030



**100%**  
of new buildings will  
be zero-emission at  
the operational stage



**100%**  
of electric energy supplied to our own  
offices, retail and office buildings, as  
well as all CitySpace locations, and our  
construction sites will come from RES



**2+**  
a minimum of two  
new plantings will  
replace any tree  
removed



**100%**  
of our projects will  
be developed within  
municipal boundaries



**90%**  
of purchased land  
for projects will be  
previously urbanized  
areas



**50%**  
of developments  
under construction  
and in the pipeline  
will be built as  
"destination" projects



# Climate change

E1

GOV-3 related to E1

Information on the remuneration of members of Supervisory Boards and Management Boards can be found in disclosure GOV-3 in the General disclosures chapter.

SBM-3 related to E1

## Material impacts, risks, and opportunities, as well as their interconnection with the strategy and business model

In the double materiality assessment, the Group identified the following significant climate-related risks:

### Physical climate-related risks (chronic risks)

- risk of additional costs associated with decarbonization — including the need to invest in modern technologies that minimize the environmental footprint and increase the efficiency of the construction process;
- risk of additional costs associated with the use of more resilient materials — the use of sustainable products for the construction of buildings may result in increased financial outlays for projects;
- risk of increased costs associated with energy efficiency requirements: the need to bring buildings up to standards such as 'Nearly Zero Energy Buildings' (NZEB), increased

- operational costs (e.g. energy) and the production of building materials (e.g. cement, which has a high carbon footprint);
- cost risks associated with the increased use of RES energy;
- risk of impaired access to capital and reduced competitiveness due to high building operating costs resulting from excessive energy consumption;
- the risk of potentially unsuccessful tenders due to the selection of more energy-efficient solutions that require higher financial investments.

### Climate-related transition risks

- regulatory risks due to the lack of climate risk monitoring procedures in the Group;
- - market risks due to impeded access to capital and reduced competitiveness due to high building operating costs caused by excessive energy consumption; and
- - market risks related to potentially unsuccessful tenders due to the selection of more energy-efficient solutions that require higher financial investments.

The Group has not analyzed in detail the resilience of its strategy and business model in terms of climate-related risks, as well as the potential impacts (including risks) on its business or assets arising from climate change or its mitigation and adaptation efforts.

Details of the assessment of the materiality of each theme and sub-theme, the impacts thereof on the strategy, business model, value chain and way of working, human and environmental impacts,

financial implications, time horizons, and the Group's response are described in ESRS2 disclosure SBM-3 in the general disclosures section.

E1-1

### Climate transition plan

The Group has not developed a transition plan for climate change mitigation aimed at achieving a sustainable economy, limiting global warming to 1.5°C, and attaining climate neutrality by 2050. The Group intends to develop and disclose such a plan in 2026 and 2027.

E1-2

### Policies related to climate change mitigation and adaptation

The Group's climate policy is implemented through the following documents:

- the sustainability strategy of the Group; and
- the internal Environmental Policy.



# Echo-Archicom ESG Strategy 2030

The Echo Investment-Archicom Group has adopted and is implementing a sustainable development strategy through 2030, which outlines its environmental goals related to energy efficiency and the use of renewable energy. In the area related to climate change adaptation and mitigation, the ESG Strategy includes the following commitments.



## 1. Re-measurement of Scope 1 and 2 greenhouse gas emissions



and the establishment of the decarbonization strategy in 2024 (the goal of implementing the strategy has been postponed to 2025).

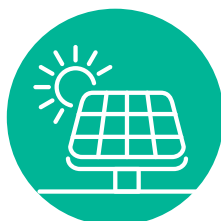
## 2. Conducting an analysis in 2024 regarding emission reduction and maximization of energy efficiency of pilot buildings:



- office (the goal postponed from 2023);
- residential;
- 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 a building's life, as well as to maximize energy efficiency. The pilot building experience is to be used to implement systemic solutions in the building standards required by the Group.

## 3. 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.

The sustainability strategy has been described in detail under the SBM-1 disclosure in the section on general disclosures. Furthermore, the Group is preparing a transition plan, as noted in disclosure E1-1 above.

The sustainability strategy addresses issues related to climate change mitigation, energy efficiency, and the use of renewable energy. Its assumptions directly address all relevant impacts, risks, and opportunities arising from the double materiality assessment of climate change, e.g.:

- **climate change adaptation** — implementing adaptation solutions;
- **climate change mitigation** — taking action to reduce Scope 1 and 2 GHG emissions;
- **climate change mitigation** — GHG emissions from investments (Scope 3);
- **energy** — energy consumption of buildings being delivered;
- **energy** — energy consumption in connection with own operations and construction sites;
- **energy** — use of energy efficient solutions and product alternatives for commercial buildings; and
- **energy** — application of energy efficient solutions and product alternatives for residential buildings.



## Environmental Policy

The individual provisions of the strategy relate to the Group's own operations, management of finished commercial buildings (lower level of the value chain), and design (higher level). They cover all of the Group's locations (not geographically restricted) and all relevant stakeholder groups.

The strategy was consulted with representatives of the Supervisory Board and the Group's staff responsible for the implementation of the various relevant strategy measures.

The Group monitors the implementation of the various strategy objectives through regular working meetings of the steering committee with those responsible for the various relevant tasks (with the participation of an internal audit representative) and regular reviews of strategy implementation at the Management Board meetings.

Responsibility for the implementation of ESG Strategy: CEO and Vice President for Finance, who is also responsible for sustainability at Echo Investment, and the CEO at Archicom S.A.

The Group has an Environmental Policy that partially addresses climate change mitigation and adaptation.

### Group's Environmental Policy goals:

- **Efficient use of energy.**
- **Reduction of greenhouse gas emissions** responsible for climate change. When it is not possible to reduce generated emissions, we strive to offset them.
- **Reduction of pollutants** emitted into the atmosphere by projects, motor vehicles, mobile and stationary equipment, and relevant processes.

The environmental policy relates to climate change mitigation and energy efficiency.

The environmental policy addresses the following significant impacts, risks and opportunities arising from the double materiality assessment of climate and energy:

- **climate change mitigation** - taking action to reduce GHG emissions from scope 1 and 2,
- **climate change mitigation** - GHG emissions from investments (scope 3),
- **energy** - energy consumption in own operations and construction sites.

The provisions of the Environmental Policy primarily concern construction sites (higher up the value chain). They cover all the Group's locations (not geographically restricted) and all relevant stakeholder groups. Although the Group has not set targets in the scopes indicated, it monitors GHG emissions (through an annual GHG emissions survey) and energy consumption (monthly reporting from construction sites).

Responsibility for implementation of Environmental Policy: EHS Manager (Echo Investment S.A.) and Head of the EHS (Archicom S.A.)





E1-3

## Actions and resources in relation to climate policy

### Climate change mitigation and adaptation actions taken in 2024 and planned for the future

#### Actions taken in 2024

- **measurement of the Group's carbon footprint** to track progress against the previous year and to set decarbonization priorities for future periods (described in detail in disclosure E1-6). The expected outcome of this exercise was to gain information regarding emissions generated from the Group's activities in its own operations and in specific areas in the value chain. All data refers to Poland.
- **commencement of work on climate risk analyses**, including scenario analyses, the results of which are expected to be ready in 2025. The expected outcome of this activity is the acquisition of information to undertake the systemic management of these risks. This applies to the Group's own operations and selected elements of the value chain;
- **analysis in 2024 regarding emission reduction and maximization of energy efficiency** of residential, office and residential for rent buildings with the goal of implementing economically justified materials and technological solutions that reduce GHG emissions at each stage of a building's life,

as well as to maximize energy efficiency. The experience is to be used to implement systemic solutions in the building standards required by the Group. Applicable to own operations and selected elements of the value chain;

- **the development of guidelines for reducing the carbon footprint** during the design, construction, and operation phases. The expected outcome of this activity was to obtain information on practices that will reduce the carbon footprints of the buildings built by the Group and are feasible to implement in the short term. The guidelines will be implemented in 2025 building standards and will contribute to reducing emissions and mitigating climate change. They address the Group's upstream (design and construction) and downstream (management and operation) value chain;
- **to ensure 100% RES contribution to the Group's own electricity consumption** (operation of its offices, excluding sales offices) in 2024. The expected outcome of this measure is to meet one of the targets of the sustainability strategy and to reduce the Group's carbon footprint. Refers to the Group's own operations;
- **updating contracts with the managers of finished buildings** to improve the quality of the data on utility consumption and office waste on which the Scope 3 carbon footprint is calculated. The expected result of this action is access to a greater range of data that will enable the Group to take action to optimize utility consumption and reduce waste generated. Applies downstream of the Group's value chain. The Group assumes that it will update all contracts in 2025;

- **the development and implementation of a pilot process for gaining Scope 3 carbon footprint information** from contractors on site. The expected outcome of this exercise is to receive more of the data needed to take decarbonization measures upstream in the Group's value chain (on construction sites); and
- **the introduction of individual technological or material solutions in individual projects**, e.g. infrastructure for rainwater retention and greenery on roofs and walls of buildings, limiting their heating, which reduces the costs of cooling the building in summer (higher level of the Group's value chain). This is linked to, among other things, BREEAM certifications (described in detail below).

#### Planned activities

- **to develop and implement a decarbonization strategy and transition plan in 2025 and 2026**. These actions relate to the Group's own operations and value chain;
- **to increase the share of renewable energy** within the value chain, in line with the ESG strategy and the timetable set out therein. The expected outcome of this action will be a partial decarbonization of the Group's value chain. This is a permanent measure, i.e. implemented annually by amending contracts with energy suppliers in connection with buildings and construction sites.



- **to gradually introduce new technological and material solutions** to projects, depending on the development of technologies and the economic viability of their implementation. The expected result is a partial decarbonization associated with the higher level of the Group's value chain. This is a permanent measure with no defined time horizon; and
- **to regularly update the requirements, standards, and policies** for contractors and suppliers aimed at reducing the negative climate impact of their operations (in relation to cooperation with the Group).

The Group's activities listed above are carried out in accordance with the following decarbonization levers:

1. the energy efficiency of designed and completed investments (projects);
2. increase of renewable energy use in the relevant processes (construction, use for own consumption — in own offices); and
3. optimization of the materials and products transport to construction sites (efficient ways of organizing and measuring carbon footprints).

In taking action to mitigate climate change, the Group has not assumed specific levels of greenhouse gas emission reductions and has not monitored this issue.

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.

The achievement of the Group's plans and objectives, especially in the long-term perspective, is highly dependent on all the above-mentioned resources.

The Group is not in a position to indicate or estimate the amount of capital expenditures and operational expenditures required to meet the listed climate change mitigation (including emission reduction) and adaptation targets.

The capital expenditures incurred for the activities related to counting and analyzing the carbon footprint reduction for the Group and for the projects in 2024 amounted to nearly PLN 233,000. The Group is not able to detail the capital expenditures for implementing solutions and undertaking mitigation activities in connection with investment projects.

## Measures taken at the level of project development

### Measuring the embedded carbon footprint of a building's life cycle

In 2024, the Group introduced pilot measurements in connection with the life cycle embedded carbon footprint (LCA) of a residential building (Archicom) and a building with rental flats (Resi4Rent), as well as a comparative analysis of office developments (Echo Investment) based on the available results of analyses of the life cycle of buildings. The knowledge gained will be used in the next stages of the sustainability strategy, including, in particular, the development of the transition plan and the decarbonization strategy.

Five office buildings (Brain Park complex in Kraków, Fuzja and React in Łódź) and the Resi4Rent Puskarska rental building in Kraków were analyzed, and Archicom commissioned the preparation of such an assessment for the ZAM residential building in Kraków. The aim of the analysis was to establish reference values for the embedded carbon footprint.

Based on the results of the analysis of the five office buildings, it was determined that the average embedded carbon footprint value for Echo Investment's office buildings is 408 kg CO<sub>2</sub>/sq.m./year and is below the average values determined for the non-residential sector (approximately 600 kg CO<sub>2</sub>/sq.m./year) according to the Ramboll report 'Towards embodied carbon benchmarks for buildings in Europe. #2 Setting the baseline: A bottom-up approach'.



The established embedded carbon footprint value for the Resi-4Rent Puskarska building in Kraków was 623 kg CO<sub>2</sub>/sqm./year and is close to the average values for multi-family residential buildings (600-800 kg CO<sub>2</sub>/sqm./year). The total embedded carbon footprint of the residential building was 596 kg CO<sub>2</sub>/sqm./year, according to the analysis carried out for the Archicom Group. This value is below average.

The analysis and recommendations were compiled by the Climate&Strategy Foundation. Its experts point out that the reference to international databases is only an informative background for the values obtained. A real reference for the results could be a Polish database, reflecting the specifics of the local market, which, unfortunately, has not yet been created.

As a result of the analyses carried out, recommendations for sustainable design and green building management and guidelines for building managers have been developed to complement existing procedures, standards, and practices. These have been communicated to the directors and managers of the design, contracting, implementation, and property management teams. In the next step, detailed provisions for implementation in contracts with partners and detailed briefs for designers will be developed on the basis of these guidelines. This activity is scheduled for implementation in 2025 and 2026. The full implementation of the guidelines for use will contribute to reducing the carbon footprint of the Group’s development projects throughout their life cycle.



Life Cycle Assessment (LCA) of Buildings

The Life Cycle Assessment (LCA) analysis is the assessment of the environmental effects of a building throughout its life cycle, from construction, to use, to demolition. The methodology for the calculation of the LCA is based on EN 15978:2012 “Sustainable construction — Assessment of the environmental performance of buildings — Calculation method.” This European standard focuses on a calculation method to assess the environmental performance of a building and its components.

The building data sheet was taken into account for the calculations without taking into account the energy consumed by the tenants. The LCA is a technique aimed at reducing negative environmental impacts by analyzing and assessing the potential risks of a given product or process. The main objective of the analysis is to provide reliable information on the environmental impact, which is the carbon footprint (CO<sub>2</sub> equivalent emissions) of a building over its entire life cycle. The analysis was developed on the basis of the detailed design and only this phase of the project was analysed in the assessment.

The assessment was carried out using OneClick LCA software. The software has 11 independent certifications and standards for life cycle assessment and life cycle costing, including BREEAM guidelines.

Basis of development

The analysis was based on the following documents:

1. a description of the architectural design;
2. a land-use drawing;
3. unit price tables including manufacturer's material data for:
  - piling;
  - foundation slab;
  - ground floor construction;
  - structures above the ground floor;
  - finishing work;
4. the energy performance of the building; and
5. a summary of the building's utility consumption in 2023



### Energy and climate action in relation to BREEAM certification

An element of Echo Investment's strategy for commercial projects (primarily office buildings) is their certification in the international BREEAM system. This is a system for assessing the sustainability of buildings and one of the most popular environmental certificates in Europe. During the BREEAM certification process, buildings are assessed according to objective criteria, including clearly defined technical parameters in the following eight areas: management, health and well-being, energy, transport, water, materials, land use and ecology, and pollution. These issues also include additional requirements in the area of climate and energy.

BREEAM certification requirements refer to the issues of mitigating climate change and energy efficiency.

#### BREEAM certifications obtained in 2024

Building	Type of certificate	Evaluation result	Points obtained (out of a possible 100 percent)
React in Łódź	As-built certificate (final)	Excellent	70.5%
Brain Park C in Kraków	As-built certificate (final)	Excellent	78.9%

The shell & core was certified.

### Implemented solutions relating to energy and climate issues



#### React in Łódź

The creation of a theoretical energy model of the building (i.e. based on the materials and solutions envisaged in the project) and a comparison of its parameters to the values for buildings meeting the minimum requirements of the applicable technical conditions. Main conclusions from the comparison:

- 54%** the energy demand of the designed building is 54 percent lower than that of a building complying with the minimum requirements
- 57%** the primary energy demand value is 57 percent lower than that of a building complying with the minimum requirements;
- 54%** the CO<sub>2</sub> emissions are 54 percent lower than in a building complying with minimum requirements.



#### Brain Park C in Kraków

The creation of a theoretical energy model of the building (i.e. based on the materials and solutions envisaged in the project) and a comparison of its parameters to the values for buildings meeting the minimum requirements of the applicable technical conditions. Main conclusions from the comparison:

- 22%** the energy demand of the building is 22 percent lower than that of a building complying with the minimum requirements;
- 23%** 23 percent lower primary energy demand value than a building complying with minimum requirements;
- 23%** 23 percent less CO<sub>2</sub> emissions than a building complying with the minimum requirements.



E1-4

### Climate change mitigation and adaptation goals

The Group has not developed a decarbonization strategy and has not defined greenhouse gas reduction targets. Currently, it is in the process of developing a scenario analysis of the impact of climate change on its operations, which will be presented in the 2025 report.

However, the Group has established other goals for managing significant impacts, risks, and opportunities related to climate change mitigation and adaptation.

The objectives set are a direct result of the Echo-Archicom 2030 Strategy. The objectives have a specific timeline that does not require the indication of a base year (the objectives are not implemented with reference to a base year). The objectives were defined internally by the Group, taking into account the Group's analysis of impacts and opportunities and stakeholder feedback. Stakeholders were not directly involved in setting the targets.

The targets are not based on indisputable scientific evidence.

The Group monitors the extent to which individual targets are achieved through the following activities:

- regular working reviews of progress against the objectives set out by the Steering Committee and those responsible for implementing individual objectives or carrying out activities;
- regular reports on the implementation of the strategy to the Management Board.

### The Group’s goals for managing significant impacts, risks, and opportunities related to climate change mitigation and adaptation

Goal	Implementation time*	Implementation status
Adoption of the decarbonization strategy for Scope 1 and 2	2024	The Group plans to adopt a decarbonization strategy in 2025.
Adoption of the decarbonization strategy for Scope 3	2025	The Group plans to adopt a decarbonization strategy in 2025.
100% green electricity in buildings used for the Group's own needs (headquarters)	2023	100% of the energy used by the company's own offices comes from renewable sources (excluding Archicom’s sales offices).
100% of green electricity in finished buildings managed by the Group (office buildings and shopping centers)	2025	In progress.
100% of green electricity in CitySpace offices	2026	In progress.
100% of green electricity at construction sites managed by the Group	2026	In progress.
Ensuring zero emissions for all new Group buildings during the operational phase	2030	In progress; the goal is achievable.

\* Due to organisational changes within the Group, the achievement of some goals will be slightly postponed.



Due to the expected impact on climate change mitigation, the most important planned action is the development of a decarbonization strategy for Scope 3, as it relates primarily to developed projects, materials and technologies used. At the same time, it also contributes to increasing the energy efficiency of buildings.

**EI-5****Energy consumption and energy mix**

The energy consumption in the Echo Investment Group's own operations is primarily due to the operation of its own offices, as well as the functioning of finished but unoccupied buildings (most often built office buildings). In this case, consumption relates to electricity and heat (network). Another category is the Group's own vehicle fleet, which overwhelmingly uses diesel fuel.

The vast majority of the energy consumed is purchased. The direct consumption of fuels (with the exception of vehicle fuel) is negligible.

The Group's activities are related to the real estate and the construction sector. These are sectors with a significant impact on the climate. Accordingly, the amount of net revenue from activities in sectors with a significant impact on the climate corresponds to the "revenue from sales" item in the consolidated financial statements of the Echo Investment Group.





Energy consumption and energy mix for the Group's own operations in MWh  
(scope identical to Scope 1 and 2 of the carbon footprint) in 2024

Fossil fuel		MWh
1	Fuel consumption from coal and coal products	0
2	Fuel consumption from crude oil and coal products	3,136.58
3	Fuel consumption from natural gas	349.96
4	Consumption of fuel from other fossil sources	0
5	Consumption of purchased or procured electricity, heat, steam and cooling from fossil sources	3,298.99
(1-5)	Total energy consumption	6,785.53
	Share of fossil sources in total energy consumption	78.10%
Nuclear fuel		
6	Energy consumption from nuclear sources	0
6	Share of energy consumption from nuclear sources in total energy consumption (%)	0
Renewable resources		
7	Consumption of fuel from renewable sources, including biomass (which also includes industrial and municipal bio-waste, biogas, renewable hydrogen, etc.)	0
8	Consumption of purchased or procured electricity, heat, steam and cooling from renewable sources	1,903.28
9	Consumption of self-generated, renewable energy, without fuel consumption	0
(7-9)	Total renewable and energy consumption	1,903.28
	Share of renewable sources in total energy consumption (%)	21.90%
Total energy consumption		8,688.82

Group's energy intensity (MWh per 1,000 PLN of revenue)

Total energy consumption	8,688.82
Consolidated revenue (in thousands of PLN)	1,083,405
Energy intensity (total energy consumption / revenue)*	0.00802 MWh/1,000 PLN

\* All of the emissions and all of the 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.



Principles used to calculate the level of the above measure

The energy consumption and energy mix data presented below are based on the following information and assumptions:

- actual energy consumption derived from invoices,
- inclusion of the energy mix of each producer or energy supplier from 2024 (or, if these data are not yet available, from 2023).

The measurements of the indicators have not been verified by an external body.



# Greenhouse gas emissions

EI-6

Scope 1 uses the GHG standard Protocol to calculate the Group's carbon footprint from “A Corporate and Reporting Standard, revised edition, March 2004” and the “World Resources Institute and World Business Council for Sustainable Development (revisions and amendments: Required gases GWP values, February 2013).”

In Scope 2, the GHG Protocol standard was used to calculate the Group's carbon footprint from the “Scope 2 Calculation Guidance” and “An amendment to the GHG Protocol Corporate Standard, 2015. world Resources Institute.”

In Scope 3, the GHG Protocol standard was used to calculate the Group's carbon footprint from the “Corporate Value Chain (Scope 3) Accounting and Reporting Standard,” the “Supplement to the GHG Protocol Corporate Accounting and Reporting Standard, 2011,” the “World Resources Institute and World Business Council for Sustainable Development and GHG Protocol,” the “Technical Guidance for Calculating Scope 3 Emissions (version 1.0),” the “Supplement to the Corporate Value Chain (Scope 3),” the “Accounting & Reporting Standard, 2013,” and the “World Resources Institute and World Business Council for Sustainable Development.”

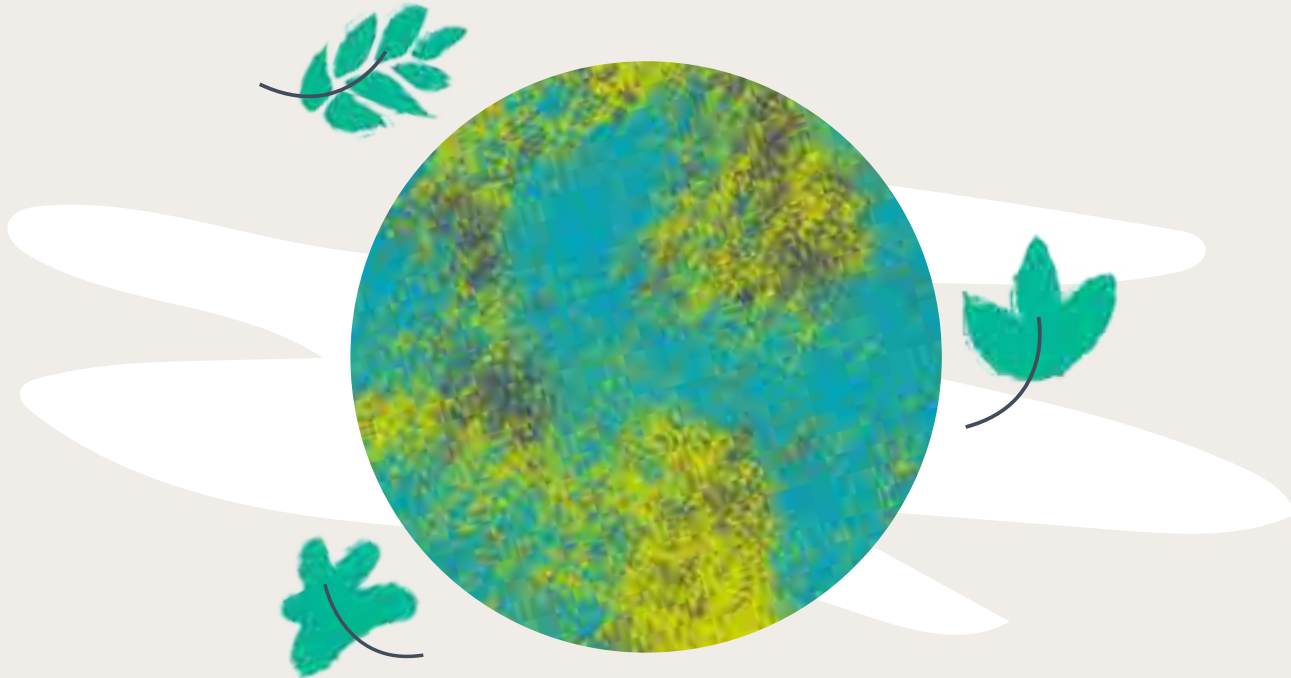
The organizational boundaries of the emissions calculations performed were established on the basis of operational control.

## Greenhouse gases included

All greenhouse gases listed in the GHG standard were included in the footprint calculations protocol: 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>). The relative greenhouse effect values expressed as Global Warming Potential (GWP) per 100 years used for individual greenhouse gases were taken from the Sixth Report of the Assessment Intergovernmental Panel for Climate Change (IPCC), as recommended by the GHG Protocol.

## Exeptions:

- For Scope 3, emission factors were derived from the DEFRA 2024 baseline, which used the Fifth Report of the Intergovernmental Panel for Climate Change (IPCC). In accordance with the GHG standard protocol, which indicates that carbon footprint calculations should use the latest published GWP values of the GHGs concerned, the emission factors should be recalculated according to the values given in the Sixth Report of the Intergovernmental Panel for Climate Change (IPCC). For categories 4, 6, 7 and 9 of Scope 3, this is not possible when assuming the calculation of GHG emissions from the entire life cycle of fuels, as the values of the emission factors from direct combustion are



- given by value for the GHGs concerned, while the values of the WTT emission factors are only given in the unit CO<sub>2</sub>e.
- Exiobase 2022, which uses the average GWP value for methane, i.e. 27.9, due to the difficulty of assigning values. This indicator database regarding fossil and non-fossil fuels was chosen due to the fact that it uses the average value (given in Table 7.SM.7 of the Sixth Report of the Intergovernmental Panel for Climate Change).

The Group is not excluded from the EU benchmarks aligned with the Paris Agreement in accordance with the exclusion criteria set out in delegated regulation to Commission (EU) 2020/1818 on standards for climate benchmarks. The Group has not developed a method to align its business with the provisions of Commission Delegated Regulation (EU) 2021/2139.



### Echo Investment Group's carbon footprint in 2024

Scope and category in Scope 3	Value [t CO <sub>2</sub> e/year]
Scope 1 greenhouse gas emissions	
Scope 1 gross greenhouse gas emissions	858
Percentage of Scope 1 greenhouse gas emissions from regulated emission trading schemes (%)	0%
Scope 2 greenhouse gas emissions	
Gross Scope 2 greenhouse gas emissions by location-based method	2,404
Gross Scope 2 greenhouse gas emissions under a market-based approach	1,155
Scope 3 greenhouse gas emissions	
Total gross indirect greenhouse gas emissions (Scope 3)	634,129
Category 1 - purchased goods and services	115,618
Category 2 - capital goods	1,873
Category 3 - fuel and energy related activities (not covered under Scope 1 or 2)	771
Category 4 - upstream transport and distribution	33
Category 5 - waste generated by the operation	33
Category 6 - business trips	286
Category 7 - employee commuting	274
Category 8 - operational leasing (upstream)	-
Category 9 - transport and distribution (downstream)	-
Category 10 - processing of products sold	-
Category 11 - use of products sold	498,979
Category 12 - processing of sold products at the end of life	2,567
Category 13 - operating leasing (downstream)	10,190
Category 14 - franchising	-
Category 15 - investments	3,505

Total greenhouse gas emissions	Value [t CO <sub>2</sub> e/year]
Total greenhouse gas emissions (location-based method)	637,390
Total greenhouse gas emissions (market-based method)	636,141

#### Relevant assumptions made in the carbon footprint calculations



**Scope 1:** The calculation has been based on source data. Data sources include internal company records, information from suppliers, IPCC AR6, National Refrigerants and DEFRA.

**Scope 2:** The calculation was based on source data. The data sources for the location-based method are KOBiZE and URE. The data sources for the market-based method are indicators from suppliers. For the market-based method, guarantees of energy origin were taken into account.

**Scope 3:** The calculation of the carbon footprint was performed on the basis of source data, with the exception of categories 5 and 7, which, however, are not significant for the overall calculation (both account for 0.05 percent of the total Scope 3 emissions). The estimates used did not significantly affect the quality of the calculations. The percentage of emissions calculated using primary data obtained from suppliers or other value chain partners in Scope 3 is 40.76 percent.



Relevant categories in scope 3 that have a high or very high impact on the Group's operations

Category	Source of emissions	The chosen method of calculation	Data sources
Category 1: Purchased goods and services	Resulting from purchased materials, products and services and water consumption in 2024 The scope of this category is due to the accounting policies adopted by the Group.	<ul style="list-style-type: none"><li>Average-data method</li><li>Spend-based method</li></ul>	Expenditure statements of cost accounts from accounting settlements, internal company records, DEFRA, CSO, Exiobase, KOBiZE and URE
Category 2: Capital goods	Those resulting from the purchase of capital goods include electronic devices such as tablets, televisions, speakers, audio/video systems and cameras included in this category among others. Also are issues related to interior decoration and furnishings (including the purchase of furniture and artwork), as well as the security of construction sites (e.g. barriers and fences). In addition, emissions related to the purchase of apps are included.	<ul style="list-style-type: none"><li>Supplier-specific method</li><li>Average-product method</li><li>Average spend-based method</li></ul>	Fixed asset statements, EPD, cards, ADEME and Exiobase
Category 3: Energy and fuel-related emissions not included in Scope 1 and 2	Upstream emissions of purchased fuels (extraction, production and transport of fuels) consumed at stationary and mobile owned sources or controlled by the company Upstream emissions of purchased energy (extraction, production and transport of fuels used to generate electricity and heat - district heating). Direct and emissions upstream upstream (extraction, production, transport of fuels used to generate electricity and heat - network heat) resulting from losses associated with the transmission and distribution (activities and combustion) of electricity and heat - network heat.	<ul style="list-style-type: none"><li>Average-data method</li><li>Location-based method</li></ul>	DEFRA, IEA, GEMIS, KOBiZE and URE
Category 4: Upstream transport and distribution	Resulting from postal and courier services.	<ul style="list-style-type: none"><li>Spend-based method</li></ul>	Accounting statements, information carbon footprint from courier companies, Exiobase
Category 5: Waste generated from operations	Resulting from the production of wastewater, municipal waste generated at facilities used by the Group.	<ul style="list-style-type: none"><li>Average-data method</li></ul>	Company internal records, DEFRA, The Scottish Environment Protection Agency and CSO



Category	Source of emissions	The chosen method of calculation	Data sources
Category 6: Business trips	Related to business travel, accommodation and the lump sum paid by the Group to its employees for the purpose of employees travelling to clients and construction sites.	<ul style="list-style-type: none"><li>Distance-based method</li><li>Spend-based method</li></ul>	Data from meters, accounting statements, DEFRA and Exiobase
Category 7: Staff commuting	Those related to employee commuting include the use of various modes of transport, such as cars, trams, city buses, rail, bicycles and scooters.	<ul style="list-style-type: none"><li>Distance-based method</li></ul>	Employee survey on employee commuting from home to work, DEFRA, KOBiZE and Energy efficiency trade-offs in small to large electric vehicles
Category 11: Use of products sold	Related to the Group's use of sold buildings and flats.	<ul style="list-style-type: none"><li>Greenhouse gases and products that contain or form greenhouse gases that are emitted during use</li></ul>	LCA analysis for Group buildings, business data
Category 12: End-of-life treatment of sold products	Associated with the demolition of residential and commercial buildings sold by the Group in the reporting year, at the end of their life.	<ul style="list-style-type: none"><li>Average-data method</li></ul>	LCA analysis for Group buildings, business data
Category 13: Downstream - leased assets	Resulting from leakage of refrigerants, combustion of fuels for heating, combustion of fuels in emergency power units and purchased electricity and heat (district heating) in the Group's leased investments.	<ul style="list-style-type: none"><li>Asset-specific method</li><li>Average-data method</li></ul>	Data from managers property, NIR Poland, IPCC AR 6, National Refrigerants, data from suppliers, KOBiZE and URE
Category 15: Investments	Related to shares in companies or buildings on a joint venture basis, namely Resi4Rent and Galeria Młociny.	<ul style="list-style-type: none"><li>Investment-specific method</li></ul>	LCA analysis for Group buildings, data from suppliers, KOBiZE and DEFRA

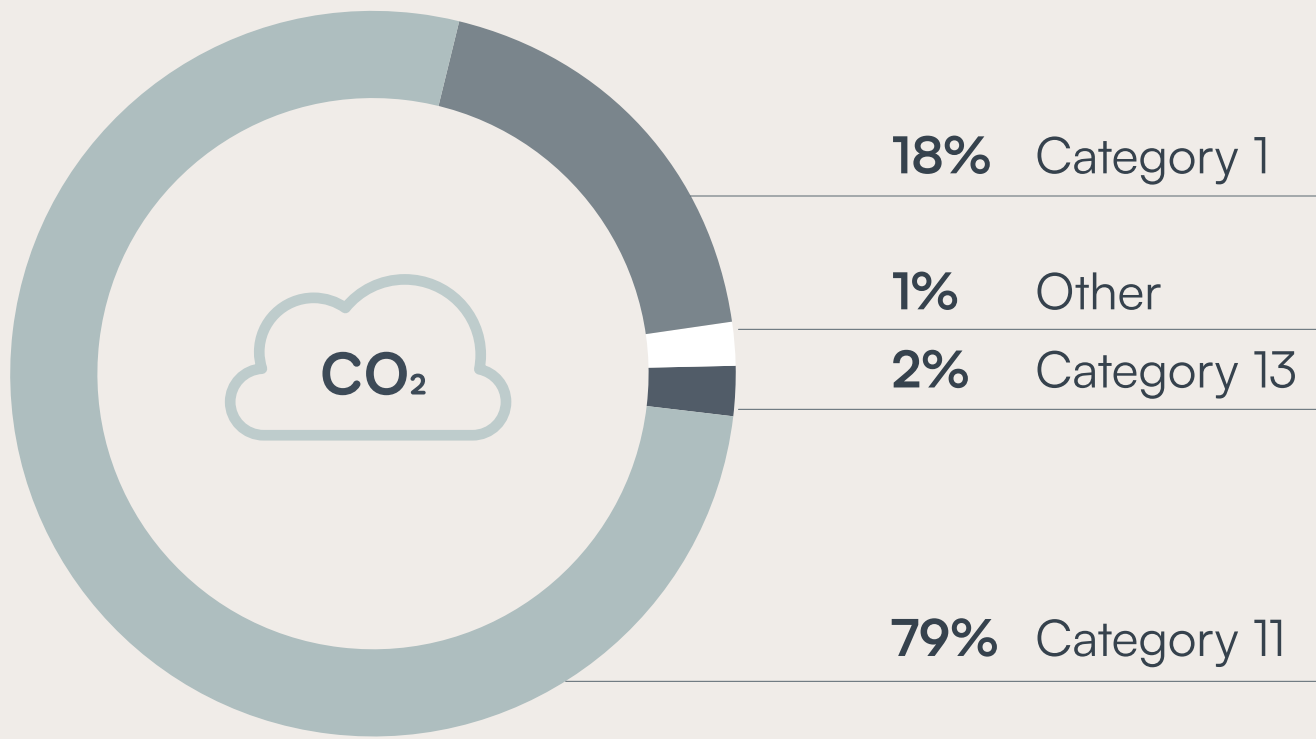


The selection of Scope 3 categories was based on a double materiality assessment, the ENCORD construction industry standard (Construction CO<sub>2</sub>e Measurement Protocol. A Guide to reporting against the Green House Gas Protocol for construction companies, 2012), the CDP analyses presented in the CDP report for the development industry (Technical Note: Relevance of Scope 3 Categories by Sector 1), the document SBTi (Buildings sector science-based target-setting criteria 2) for the construction industry, benchmarking of companies in the industry, internal analysis of the company's operations, business model, financial materiality, reputational risks and interviews and consultations with Group staff.

The methods chosen to calculate each Scope 3 category were selected from those permitted by the GHG Protocol, and the choice of method used for each category was based on the availability of appropriate indicator data to make the calculations as accurate and relevant as possible.



Percentage individual share of Scope 3 issue categories for Echo Investment Group



Issues arising from construction projects where the Group manages the construction as part of a joint venture in which a Group company has an interest (e.g. Towarowa 22, Browarna Project) are included in Category 1 of Scope 3.

Emissions from construction sites that are outsourced by Echo Investment to an company Archicom group have been included in 's carbon footprint emissions Archicom.

For the data calculated on a cost basis, due to the lack of an available EXIOBASE emission factor for 2024, the most recent emission factor from the EXIOBASE database for 2022 was used. Therefore, it was decided to include the level of inflation in the conversion between 2024 and 2022 for the individual countries where the costs were incurred.



Biogenic emissions

Scope 1

These are emissions in addition to those from the combustion of biocomponent added to fuels commonly available at service stations and used in vehicles owned or controlled by the company. In 2024, the value of the Group's Scope 1 biogenic emissions was 49,815 kg CO<sub>2</sub> equivalent.

Scope 2 i 3

In scope 2, biogenic emissions occur due to the combustion of biomass during energy production. As national institutions do not provide information on the fuel mix, in particular the percentage of biomass burned in total energy production, it is not possible to calculate biogenic emissions in scope 2.

In scope 3, biogenic emissions may occur in transport (potentially relevant for categories 4, 6, 7 and 9). As the exact value of fuel consumption and its biocomponent content is not known, it is not possible to separate these emissions. Additionally, Scope 3 biogenic emissions may appear in categories 1 and 2 for individual purchased products, services and capital goods. The Group has no information from suppliers on these emissions.

Emission intensity

The emissions intensity was calculated based on the total emissions disclosed above and the sales revenue reported in the consolidated financial statements.

Greenhouse gas emissions intensity for Echo Investment Group according to the method location-based in 2024

Position	Indicator
Total greenhouse gas emissions (a)	637,391 t CO <sub>2</sub> e
Sales revenue (b)	1,083,405 thousand PLN
Emission intensity (a/b)	0.588 t CO <sub>2</sub> e/1 thousand PLN

The measurement of the measure used in this disclosure has not been validated by an external body other than the assurance provider.

GHG intensity for Echo Investment Group according to the method market-based in 2024

Position	Indicator
Total greenhouse gas emissions (a)	636,141 t CO <sub>2</sub> e
Sales revenue (b)	1,083,405 thousand PLN
Emission intensity (a/b)	0.587 t CO <sub>2</sub> e/1 thousand PLN



# Water and marine resources

E3

E3-1

## Water-related policies

The group does not have a policy regarding the subject of water.

E3-2

## Water management activities and resources of the Group

The Group's development investments are designed and built in accordance with specific technical standards, including those concerning specific environmental protection issues. In commercial buildings, the Group uses water-saving devices such as aerators in taps, low-flow fittings, water meters, and a BMS system to quickly locate leaks in areas where significant impacts have been identified. Educating managers on how to optimize the use of installed systems and devices is also an important activity.

The following solutions for water recovery and reuse also contribute to reducing water intake and consumption:

- 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.

The Group's resources in relation to water management are primarily the expertise and know-how of its employees and associates, as well as specialists whose work the Group uses. These are primarily environmentalists, plumbing engineers, and designers. They develop approaches to specific issues related to the reduction of water abstraction and consumption individually for each development project. The solutions used depend on legal requirements, the type, size and standard of the project, soil and spatial conditions, and market expectations.

## The issue regarding water in BREEAM-certified buildings

Echo Investment's approach to the identified significant impact (reducing water intake and consumption in commercial buildings) is expressed, among other things, by the long-standing practice of building commercial developments in accordance with the BREEAM system, in which all of the Group's office buildings and shopping centers are certified. For more information on the BREEAM system, see disclosure E1-3.

BREEAM refers to the design of commercial buildings with a view to reducing water consumption and usage. It concerns the upper level of the value chain (design), in-house operations (setting standards), and the lower level of the value chain (operation of finished buildings).



In 2024, two office buildings by Echo Investment received BREEAM certification: React in Łódź and Brain Park C in Kraków.



## Implemented solutions relating to the issue of water



### React in Łódź

- **The installation of low-water consumption fittings and flow restrictors.** The installed fittings allow for a 66.14% reduction in water consumption compared to standard solutions for this type of building (i.e. a building that meets the minimum requirements set out in the technical conditions). The installed fittings also meet the requirements of the regulation establishing the technical criteria for qualification for the EU Taxonomy.
- **The installation of a main water meter** enabling remote reading, continuous measurement and data collection by the BMS system, which enables proper water management.
- **The installation of a leak detection system** connected to the BMS system to enable a rapid response.
- **The installation of electromagnetic valves** to shut off the water in toilets when the light is switched off (connected to a motion sensor).

### Brain Park C in Kraków

- **The installation of low-flow fittings and flow restrictors.** The installed fittings allow for a 54% reduction in water consumption compared to standard solutions for this type of building (i.e. a building that meets the minimum requirements of technical conditions). The installed fittings also meet the requirements of the regulation establishing technical criteria for qualification for the EU Taxonomy.
- **The installation of water meters** enabling remote reading, continuous measurement and data collection by the BMS system, which enables proper water management.
- **The installation of a leak detection system** that is connected to the BMS system and enables immediate response.
- **The installation of electromagnetic valves** that shut off the water in toilets when the light is switched off (connected to a motion sensor).

The direct expected result in relation to the implementation of the above-mentioned solutions was to obtain the BREEAM certificate at the assumed level, while the indirect result was to reduce water consumption in completed buildings. The results of this action — reduction of water consumption — have been visible since the beginning of the building's operation.

### Design and operation of buildings with a view to reducing water consumption and usage

In 2024, the Group carried out pilot measurements of the embodied carbon footprint for selected buildings (details of this process are described in disclosure E1-3). Subsequently, environmental guidelines were developed for specific areas and types of properties, which were communicated to stakeholders and will be implemented in the Group's project standards by 2025.

#### Key measures recommended for designers regarding water management: :

- slowing down the discharge of rainwater into the sewer system by increasing the volume of retention tanks beyond the legal requirements;
- additional retention of rainwater for watering green spaces;
- micro-retention through the use of green walls and roofs, absorption basins, retention basins and others; and
- the use of permeable surfaces.

#### Key water-related measures recommended for property managers:

- to maintain the number and quality of water meters provided by the developer, including garden water meters; and
- the regular analysis of water consumption.



The recommendations listed above apply to rental apartment buildings and student halls, which the Group realizes as a substitute investor. Both property categories are classified as commercial (non-residential) investments.

The recommendations will be incorporated into Echo Investment's standards in 2025. The expected result of these measures will be a reduction in water use (especially for irrigation) by increasing on-site retention capacity. The effects of this measure will be noticeable after the commissioning of the first project to implement the recommendations (most likely in 3-4 years).

In addition to the measures described above, the Group's approach to water management is based on researching new technical solutions, equipment and technologies that can help reduce water consumption or increase water efficiency. This is an ongoing process with no specific timeline or assumptions about the number of solutions implemented or analyzed, or the expected reduction in water consumption. The Group intends to continue this process in 2025.

All of the above-mentioned measures are aimed at reducing water extraction and consumption, as well as water recovery and reuse.

The Group does not undertake special measures or earmark resources for areas exposed to water-related risks, including areas with significant water shortages. The policy and measures taken are the same for all of the Group's locations (projects).

E3-3

**Water-related goals**

The Group has adopted a general goal of reducing water intake and consumption while striving for the reuse thereof. The Group has not set measurable, time-bound, result-oriented and water-related goals and does not plan to set them for now.

The Group constantly monitors water consumption in its own operations as part of its investment processes. Due to the lack of a defined target for water consumption and use, the effectiveness of the implemented policies is not measured.





E3-4

### Water consumption

Consumption, water intake, and wastewater discharge in commercial buildings managed by the Echo Investment Group

	Value
Water intake	65,479m³
— including in areas with significant water stress*	11,574 m³
Water discharge	64,427 m³
— including in areas with significant water stress*	11,574 m³
Water consumption	1,052 m³
— including in areas with significant water stress*	0

\* According to the Aqueduct Water Risk Atlas

In its own operations, as well as at a lower level of the value chain (managed completed commercial buildings), the Group does not conduct technological processes reliant on water. Water consumption and wastewater discharge are primarily associated with the social needs of employees and the maintenance of its premises (cleaning and watering greenery belonging to the respective buildings).

The Group does not recycle, reuse or store water in its commercial buildings. In some projects, the Group designs and installs water retention systems and solutions, but does not monitor the use thereof.



#### Principles applied to calculate the level of the above measurements

The above information regarding water consumption and wastewater discharge (water discharges) has been compiled based on meter readings provided by the managers of office buildings owned by the Group in its portfolio. The readings were recorded by professional, certified meters and conducted for billing purposes (related to water consumption payments), which is why the Group assesses their reliability as high. These are aggregate values for office and commercial buildings constructed and owned by the Group, as well as buildings acquired for demolition that continue to operate (leasing spaces and generating consumption). For buildings that were under the Group’s control for only part of the reporting period (e.g., sold or acquired during the year), the above data reflects actual consumption only for the period when the Group controlled the building. For buildings that were put into operation during the year, the above metric includes consumption only during the operational phase—after obtaining an occupancy permit and completing finishing works—consistent with the tenant billing approach.

The information presented above pertains to the following buildings included in the portfolio of completed commercial buildings by Echo Investment during 2024:

- shopping centers: Libero in Katowice, Pasaż Opieńskiego in Poznań, and Pasaż Kapelanka in Kraków;
- office buildings: Brain Park I and II in Kraków (with the second building added in Q1 2024); React I in Łódź (sold in Q4 2024); City Forum — City 2 in Wrocław; and MyHive Mokotów in Warsaw (added in Q2 2024),
- other buildings (parking facilities, small used office and service buildings designated for demolition).

Data has not been externally verified.

According to the World Resources Institute's tool, the Aqueduct Water Risk Atlas, among the Group's locations (cities where the Group has its office buildings or shopping centers in operation), Łódź is situated in an area of extremely high water stress, while Poznań is in an area of high water stress.



# Biodiversity and ecosystems

E4

E4-1

## Transition plan for biodiversity and the inclusion of biodiversity and ecosystems in the strategy and business model

The Group has not conducted an analysis of the resilience of its business model and strategy concerning biodiversity and ecosystems.

The Group has not developed a transition plan to improve and align its business model and strategy with the assumptions and goals of the Kunming/Montreal Global Biodiversity Framework, the EU Biodiversity Strategy for 2030, or planetary boundaries related to biosphere integrity and land-system change.

SBM-3 related to E4

The Group's activities (development projects) result in the felling of trees, sometimes large and beautiful ones, which are very important for local ecosystems. Damage repair consists of compensatory measures - both mandatory and voluntary (well above the required minimum).

As a result of growing awareness within the Group and among its stakeholders, the Group is increasingly utilising tools to protect trees and is gradually tightening its requirements for the protection of trees in its connection with its designers and subcontractors.

Issues relevant to the Group in the field of biodiversity and ecosystems, resulting from the double materiality assessment process:

- direct drivers of biodiversity loss — the removal of trees from construction sites;
- direct drivers of biodiversity — the planting and protection of existing trees.

In its analysis of opportunities, risks and impacts, the Group analyzed all of its construction sites and identified one as significant. This is one of Archicom's housing developments - Sady nad Zieloną on Księża Wielki in Wrocław, which is being built in an area that is sensitive in terms of biodiversity. The project borders the Oławska causeway, which separates it from the Natura 2000 area, a special area of conservation for Grądy in the Odra Valley (PLH020017) with the Zielona (Szalona) river.

The project is described in detail in the IRO-1 notification in connection with E4 in the chapter with general notifications.

The identified impacts, risks and opportunities do not relate to land degradation, desertification, or soil sealing. They also have no impact on endangered species.



Detailed information regarding the assessment of the materiality of individual topics and subtopics, their impact on the strategy, business model, value chain, and operations, as well as their effects on people and the environment, financial consequences, time perspectives, and the Group's response, is provided in the ERS2 SBM-3 disclosure in the chapter on general disclosures.



E4-2

Policies related to biodiversity and ecosystems

Echo-Archicom 2030 ESG Strategy

The Group's approach to biodiversity and ecosystems is based on a sustainability strategy that directly addresses the identified material impacts, risks, and opportunities.

The Group's sustainability strategy aims to ensure that the trees felled in connection with its construction projects are adequately replaced, both in terms of quantity and quality. This is a direct response to the identified significant impact: direct drivers of biodiversity loss.

The Group monitors the implementation of its individual strategy goals through regular working meetings of the steering committee with those responsible for the individual tasks (with the participation of an internal audit representative) and regular reviews of the strategy implementation at meetings of the Management Board meetings. In addition, the goal related to tree replaceability is monitored by means of an annual report prepared by a dendrologist.

The biodiversity and ecosystem strategy applies to the Group's own operations, design and construction (higher level of the value chain). It covers all of the locations of the Group (not geographically limited) and all relevant stakeholder groups. The strategy is outlined in the form of a public document, available to all interested parties on the websites of Echo Investment and Archicom.

The Group's Sustainable Development Strategy, aligned with the business strategy for land acquisition, includes two objectives related to land purchase, is designed to minimize the Group's impact on biodiversity. The Group focuses on sourcing plots located within city administrative boundaries that have already been previously developed. This approach helps reduce the use of land where flora and fauna are present, as well as reduce needs related to the removal of trees.

Responsibility for the implementation of ESG Strategy: CEO and Vice President for Finance, who is also responsible for sustainability at Echo Investment, and the CEO of Archicom S.A.

The Group's sustainability strategy and its provisions related to biodiversity in particular address significant dependencies and material physical risks (preventing excessive heating in investment areas and water retention by trees) but do not refer to transition risks. The limitation on purchasing land with high ecological value (focusing on acquiring plots within city boundaries and previously urbanized areas), as well as guidelines for tree protection, directly contribute to reducing the need for tree cutting.

The strategy does not support the traceability of products, components or raw materials with significant actual or potential impacts on biodiversity and ecosystems along the value chain.

The Group has not identified material dependencies related to biodiversity and ecosystems.

The Group's documents on biodiversity and ecosystems management:

- do not apply to production in connection with ecosystems managed to maintain or improve biodiversity conditions;
- do not apply to sourcing in connection with ecosystems managed to maintain or improve biodiversity conditions;
- do not apply to consumption in connection with ecosystems managed to maintain or improve biodiversity conditions;
- do not address the social consequences of biodiversity and ecosystem impacts.

The Group's policy and approach to issues related to biodiversity and ecosystems address the issue at stated in the ESRS E4 AR 4 d. requirement: involvement in direct impact factors related to biodiversity loss, land-use change, and invasive alien species, in particular.

Tree protection guidelines

The Tree Protection Guidelines, which were adopted by the Group in 2023 and apply to designers and construction (higher level of the value chain), are a supporting document for the Group's policy on identified significant impacts, risks and opportunities.

We have compiled all of the rules regarding measures to protect trees and shrubs during construction work on the Group's projects in the "Tree protection guidelines" handbook, which is available to contractors and subcontractors and applies to all of the Group's construction sites.



The development and implementation of such rules was one of the goals of the Group's sustainable development strategy.

**Basic rules for dealing with trees on 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 project sites, secure and observe them;
- 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 that remain on construction sites are not damaged during construction work and retain their vitality.

Responsibility for the implementation of tree-related guidelines: **Project Managers**

**E4-3****Actions and resources related to biodiversity and ecosystems**

The Group's activities in connection with biodiversity and ecosystems are based on the specialized internal and external knowledge of ecologists, dendrologists, and landscape designers. The Group has not identified other nature-based solutions in this context.

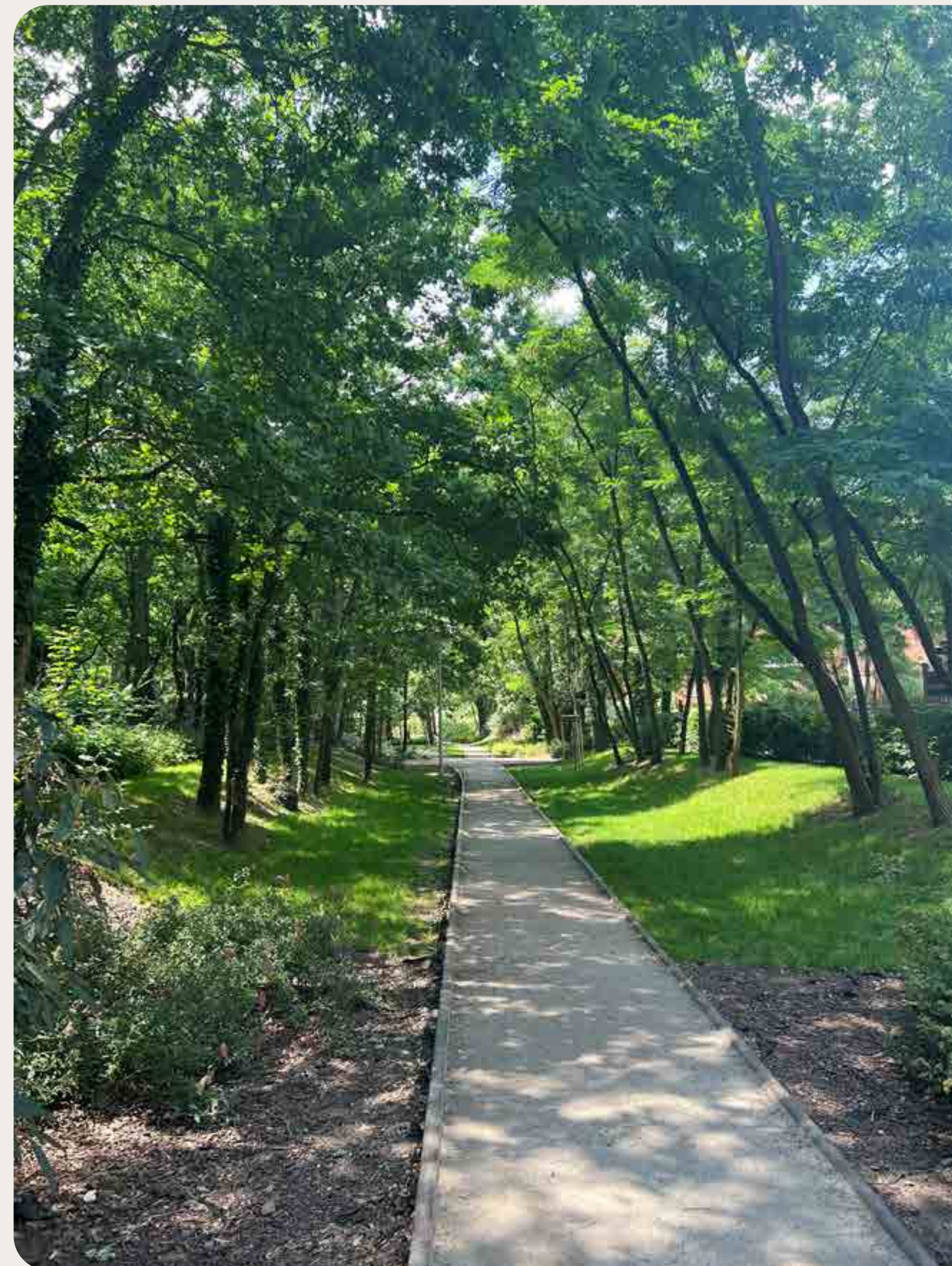
The Group did not analyze the financial consequences of the replacement of removed trees. These are measures that have

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 to promote sustainable business.

**Tree removal and planting**

The Group analyzes the issue and assesses the level of achievement of the ESG Strategy goal concerning tree replacement, as well as improving its practices regarding tree management.

The Group's development activities often necessitate interference with existing trees on project sites. To minimize this interference, the Group adheres to internal tree protection guidelines (described in disclosure E4-2). Nonetheless, in a significant number of cases, tree removal is unavoidable prior to the commencement of construction work. The Group conducts such removal in full compliance with legal regulations, obtaining the necessary permits, adhering to conditions such as permissible timeframes for tree removal, and performing required compensatory replanting or paying the appropriate fees. The Group is aware that compensatory replanting does not fully offset the environmental losses caused by tree removal, and as such, conducts an annual detailed quantitative and qualitative comparative analysis of the trees removed and those planted. This analysis is performed by an external expert, Edyta Rośton-Szeryńska, PhD, DSc. Eng.







**Her methodology involves evaluating trees based on seven criteria:**

- estimated age;
- size of felled trees or potential size of planted trees;
- species value;
- conservation status;
- location and function within the city's ecological system;
- durability and type of plant community;
- provided ecosystem services.

The expert analyzed and assessed each tree that was cut down and planted, assigning a score from 1 to 5 for each criterion. The analysis was conducted using the following tools and documents:

- documentation on felled trees (tree removal permits);
- technical documentation, dendrological inventories, reports, and decisions related to trees affected by the relevant investment;
- records from planning documents (local spatial development plans, study of spatial conditions and directions of development);
- publications by recognized experts (e.g., Longin Majdecki's age tables, Plant Catalog: Trees, Shrubs, Perennials compiled by the Polish Nurserymen Association);
- tools used by dendrologists and scientists (e.g., i-Tree Eco program, Dr. Zbigniew Szkop's Tree Ecosystem Services Calculator);
- Google Street View, photographic documentation, aerial photos, orthophotos, geoportal;
- personal expertise and original methodology.

Each tree that was cut down and each tree that was planted received a specific number of points, indicating its ecological value. Each tree could receive a maximum of 35 points. According to the analysis, the average ecological value of a planted tree was 18.7 points, while the average value of a tree that was cut down was 20.6 points.

The quantitative tree replacement ratio for Echo Investment Group in 2024 (1.15) represents the ratio of the number of trees planted to those removed. The qualitative tree replacement ratio (1.04) was calculated as the ratio of the cumulative ecological value of all planted trees to that of the removed trees (i.e., the sum of points assigned to all planted trees compared to the sum of points for all removed trees).

The expected outcome of implementing the tree removal and replanting policy is achieving the intended level of tree replacement across all of the projects undertaken by the Group, as well as obtaining external assessments (particularly qualitative) and recommendations from a dendrologist regarding the practices applied by the Group.

The tree replacement analysis is also designed to cultivate knowledge on how to strengthen biodiversity in connection with construction projects. The Group expects that the implemented measures will result in strengthening biodiversity awareness among its employees and mitigating the impact of its business activities on the environment.



While implementing its tree replacement policy, the Group does not contribute to the introduction of any of invasive species. The species of planted plants (including trees) are usually consulted with arborists.

### The design, construction and operation of buildings to support biodiversity

In 2024, the Group conducted pilot measurements of the embedded carbon footprint of selected buildings (the details of this process are described in disclosure E1-3). As a result, environmental guidelines were developed for specific areas and types of properties, which were shared with stakeholders and will be implemented in the future into standards enforced by the Group.

#### Key actions recommended for designers (residential, rental housing, and student housing):

- conducting natural environment reports for new projects and implementing its recommendations;
- designing greenery with the strict consideration of biodiversity principles (non-invasive species, tall and climbing greenery, honey plants, tree plantings, birdhouses, flowering meadows);
- choosing drought-resistant plants.

#### Key actions recommended for construction sites:

- using only native tree species for compensatory planting (unless administrative decisions state otherwise);
- including flora and fauna considerations in construction site regulations;
- continuous monitoring of construction sites by environmental specialists;
- where possible, locating construction sites on already developed land, away from areas of high ecological value.

#### Key actions recommended for property managers (residential, rental housing, and student housing):

- maintaining biodiversity — supporting infrastructure provided by the developer;
- using salt substitutes for de-icing pathways in winter.

The expected outcome of conducting analyses and developing guidelines is the improvement of adopted biodiversity protection standards at the key stages of a project's lifecycle: design, construction, and operation. In 2025, the Group plans to incorporate these guidelines into its own building standards, which will strengthen their enforceability, making them mandatory across the Group.

### Biodiversity and ecosystem actions related to BREEAM certification

An element of Echo Investment's strategy for commercial projects (primarily office buildings) is the certification of these projects under the international BREEAM system. More information about the BREEAM system can be found in disclosure E1-3.

In 2024, two office buildings by Echo Investment received BREEAM certification: React in Łódź and Brain Park C in Kraków.





## Implemented solutions addressing biodiversity and issues related to ecosystems



### React in Łódź

- **Before construction began, a qualified ecologist prepared a report** on the condition of the site, which included information on the assessed ecological value of the area, valuable species of flora and fauna, and recommendations for implementation after the construction was completed.
- **All of the recommendations** from the ecologist regarding the protection of valuable species of flora and fauna during construction **were implemented**. This included appointing a biodiversity master to oversee the process and training construction workers on biodiversity protection during the works.
- **67% of the ecologist's recommendations for increasing biodiversity on the site after construction were implemented**. These included preparing reports during the construction phase on the protection of identified biodiversity and obtaining confirmation from the ecologist that all of the recommendations were implemented according to their guidelines.

### Brain Park C in Kraków

- **Before construction began, a qualified ecologist prepared a report** on the condition of the site, which included information on the assessed ecological value of the area and recommendations for implementation after the construction was completed.
- **Remediation of the investment site** was carried out before construction began.
- **75% of the ecologist's recommendations for increasing biodiversity on the site after construction were implemented**. These included planting native species of trees and shrubs and creating a green recreational area.
- **Construction workers were trained** in the protection of ecological values within the construction site and its buffer zone.
- **An individual was designated** to be responsible for implementing BREEAM recommendations and tree protection on the site.



E4-4

## Goals related to biodiversity

In its sustainability strategy, the Group currently has three biodiversity-related objectives aimed at enhancing the positive impact of its business on urban greenery.

### Target 1

#### Ensuring the adequate replacement of removed trees.

The annual replacement ratio must be maintained at a minimum level of 2 (in terms of the quality and number of trees, as per an external analysis conducted by a dendrology specialist). This objective was not achieved in 2024. The details regarding the achieved result are described in disclosure E4-3 above.

The introduction of a tree replacement policy taking the form of a pledge to replace removed pieces with trees having of least twice the number and assessed natural value will reduce the Group's negative impact on the environment to the extent that it is extremely important and sensitive in connection with urban communities. To ensure a professional and impartial assessment, the tree inventory analysis was performed by Edyta Roston-Sze-ryńska PhD, 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 target pertains to the Group's own operations (establishing standards for building and greenery design) and directly impacts

the practices of landscaping contractors on projects (higher tier of the value chain). The objective is based on actions aimed at offsetting the loss of biodiversity.

### Target 2

#### Developing residential projects, including rental housing, exclusively within city administrative boundaries — permanent target.

In 2024, all of the construction sites and plots purchased for the Group's investments were located within city administrative boundaries.

### Target 3

#### Purchasing plots that were previously used and developed (90% of acquired land during the entire period from 2023-2030) — limiting the development of new, undeveloped areas.

All plots of land purchased (through final agreements) by the Group in 2024 had been previously used, just like all of the plots acquired in 2023. This signifies the achievement of the target.

The Group limits its development activities to urban boundaries and previously-used industrial or real estate areas to prevent urban sprawl, support the revitalization of degraded land, and reduce

construction on areas with higher biological value. Although this restriction adds material complexity to the Group's operations, the Group has made this choice deliberately and with purpose.

The objectives pertain exclusively to the Group's own operations (land acquisition)

The established objectives fall under the following levels of the mitigation hierarchy:

- **Target 1** — Compensatory measures,
- **Target 2 and 3** — Avoidance and minimization.

These objectives were determined by the Group without the involvement of stakeholders.

The adopted biodiversity targets have not been analyzed for alignment with the Kunming/Montreal Global Biodiversity Framework, the EU Biodiversity Strategy for 2030, or other international and national policies on biodiversity and ecosystems.

All objectives directly derive from the Group's sustainable development strategy, and their implementation is supported by other policies and approaches related to biodiversity.

The Group did not apply ecological thresholds when setting its objectives. It assesses that the risk of crossing critical thresholds, where its activities could result in significant changes to the ecosystem, is low. The Group reached this conclusion after analyzing



its strategy and business model, relationships with contractors, and other connections that could negatively impact biodiversity and ecosystems.

The established objectives apply to all locations on which the Group operates (all development projects undertaken).

E4-5

Impact measures related to biodiversity and ecosystem change

Target 1

Ensuring the adequate replacement of removed trees.

The applied impact metric is based on calculating the number and quality (estimated ecosystem value) of both felled and newly planted trees. Detailed information on the methods and objectives of the analysis is presented in disclosure E4-3 above.

The measurement of this indicator is not verified by an external authority; however, it is conducted by an external expert commissioned by the Group.

Substitutability rates of felled trees

Target description	Target	2024		
		Archicom	Echo Investment	Total
Quantitative: replacement of felled trees by planting (in units)	2	1.14	1.17	1.15
Qualitative: replacement of felled trees with new plantings (in estimated natural value)	2	1.03	1.07	1.04

Principles applied to calculate the level of the above measurements

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

The measure of the Group's impact on biodiversity relates to the replacement of felled and planted trees, calculated in units and in accordance with the estimated ecosystem value. Detailed information on the methods and objectives of analyzing the value and number of trees felled and planted is presented in disclosure E4-3 above.

The indicators are not verified by an external body, although they are carried out on behalf of the Group by an external and independent expert.

Out of the portfolio of projects under construction in 2024, the Group has identified one that was being built in biodiversity-sensitive areas - Sady nad Zielona in Księżę Wielkie, Wrocław. The investment has been detailed in disclosure IRO-1 in connection with E4 in the chapter with general disclosures.



# Resource use and circular economy

E5



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 Environmental Policy. An identified key issue in this area is waste segregation on construction sites.

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

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

### In practice, the Environmental Policy leads to the application of the following guidelines on construction sites:

- accurately determining the need for materials and services and the logistics involved in providing them (prevention),
- setting and enforcing annual waste segregation goals on the construction sites level and across the entire Group (preparation for reuse),
- compliance with all of the rules for handling waste, especially hazardous waste (disposal).

The Group's policies are aimed at reducing the use of primary resources (reducing demand) and increasing the use of secondary

resources (mostly outside of its own construction sites). The separated waste is transported to specialized facilities and can be directly prepared for recycling or reuse. Non-sorted waste is first sorted outside the Group's construction sites, then sorted in plants, where it is further recycled and prepared for reuse, and waste that cannot be sorted is sent to landfills or disposed of in another way. Sorting on construction sites therefore reduces the time it takes from removal to reuse.

The Group's policies do not refer to the sustainable extraction and use of renewable resources.

The Group's policy on resource use and circular economy applies to construction sites (higher level of the value chain) overseen by the Group. It applies to all of the Group's locations (construction sites).

### Responsibility for the management of material issues: Project Managers

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



E5-2

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

#### Waste segregation

On the Group's construction sites, waste segregation systems are in place. Our first choice is to segregate construction waste by fractions already on construction sites. Waste containers are labeled in detail and include information on the relevant waste types and their codes. We also provide containers for hazardous waste and the possibility of segregating social waste.

The Group has set the goal of segregating and limiting mixed waste disposal on its construction sites 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 related mass: waste such as steal, copper, and rubble are valuable secondary raw materials. During demolitions, the Group's on-site subcontractors pre-segregate demolition materials into steel elements, reinforced concrete, brick rubble, and waste paper. Construction companies are required to segregate waste from their construction sites and provide Waste Cards with confirmations of the amount of waste produced.

If there is insufficient space for waste segregation on construction sites, the Group relies on a secondary segregation mechanism — sending mixed waste to a specialized company that performs segregation services at its facilities and provides the Group with a certificate of segregation. This approach is also applied when the

secondary segregation of mixed fractions (after initial segregation on-site) is economically justified.

Waste segregation is an activity that impacts construction sites (at a higher level of the value chain) and applies to all of the locations within the Group. It is a constant, ongoing activity, i.e., required and carried out every year.

#### Designing, building, and operating buildings for circular economy

In 2024, the Group conducted pilot measurements of the embodied carbon footprints of selected buildings. (the details of this process are described in disclosure E1-3). Subsequently, environmental guidelines were developed for specific areas and types of properties, which were communicated to stakeholders and will be implemented in the standards enforced by the Group in 2025. Below is information about the guidelines that relate to the use of raw materials and circular economy.

##### Key recommended actions for designers (higher value chain) (housing, rental housing, and student accommodations):

- to maximise the use of existing building fabric to reduce the need for new building materials;
- to utilize design solutions that promote a closed loop: applying circular building solutions, using recycled and recovered materials, and choosing local suppliers;
- to provide adequate space and infrastructure in buildings for

- the separation and storage of municipal waste;
- to design a waste management system (e.g. whether discharges or removal via goods lifts) and infrastructure for weighing and crushing waste.

##### The most important recommended measures for contractors on construction sites (higher level of the value chain):

- the reuse of waste on the same construction site or elsewhere;
- to conduct regular checks on employees to ensure the correct separation of waste;
- the introduction of waste separation procedures from construction site facilities.

##### The most important recommended actions for office building managers (lower level of the value chain):

- the introduction of mandatory waste separation into contracts with tenants; and
- the introduction of educational activities in the field of waste reduction and separation — providing additional training for employees, the introduction of campaigns encouraging selective waste collection and campaigns to exchange used electronic equipment for plant seedlings.

##### The expected results of implementing the recommendations described above into the Group's design standards:

- the reduction of the consumption of materials and primary raw materials in the construction process;



- to provide for better quality and efficiency of waste segregation;
- to introduce the possibility to monitor the weight of waste generated in connection with finished commercial buildings.

The measure mainly concerns the upper level of the value chain (design and construction sites) as well as the management of finished buildings (lower level). The stakeholder groups mainly concerned are construction site workers and users of finished buildings. The measure is not limited to a specific geographical area (it concerns all of the Group's locations).

### Changes to the waste data collection system

In 2024, the Group developed a system that will enable the collection of information from construction sites about the weight of construction waste broken down into the fractions listed in the amendment to the Waste Act, which came into force on 1 January 2025, from the beginning of 2025. The Group is prepared to collect and aggregate the relevant data. In addition, from the beginning of 2025, the Group will include appropriate clauses in new contracts with contractors that will give it access to standardized information regarding the weight of waste and the further processing thereof.

The Group will receive information on waste fractions in group 17 in accordance with the Regulation of the Minister of Climate in the waste catalogue. These are fractions with the following codes:

- **17 01** Waste concrete, brick debris, waste ceramic materials and equipment,
- **17 02** Wood, glass and plastics,
- **17 03** Roofing felt,
- **17 04** Metals and their alloys,
- **17 05** Soil (including excavated soil), stones and soil from contaminated areas,
- **17 06** Insulation materials and construction materials containing asbestos,
- **17 08** Gypsum-based building materials,
- **17 09** Other construction and demolition waste.

Hazardous waste is also listed under the subcategories of each code.

The segregation system used to date provided for the separation of waste into rubble, metal, wood, and mixed waste, the reuse of which depends on further processing in specialized plants. The expected result of this measure is to ensure the availability of better quality data, enabling the Group to make better decisions regarding impact management for contractors and waste management.

This action mainly concerns the upper level of the value chain (construction sites) and employees on construction sites as well as users of finished buildings. This action is not limited to a specific geographical area (it concerns all of the locations of the Group).







## Recycled materials in the construction of the Towarowa 22 project



The Towarowa 22 project in Warsaw is being built on the site of a former printing works. Until recently, there were industrial halls built in the post-war years, which have now been almost completely demolished. Echo Investment, which co-manages and is responsible for these projects, decided to use some of the construction waste on site. Demolition clinker was used on the construction site of the Office House project. In the arcades around this building and in the lobby, almost 300 square meters of flooring and facade will be covered with the main recycled material. On the construction site, demolition rubble was used to pave the roads for construction work, and soil from the excavations was used for levelling the site.

Architects from JEMS also planned to use the structure of one of the halls to create a unique Polish Word Park, which will bear witness to the industrial heritage of the Wola district.

Towarowa 22 is a 6.5-hectare project that will consist of more than a dozen buildings with various functions. As of the date of publication of this statement, two of them are under construction: the Office House office building and the M7 apartment building.



BREEAM certification of the Group's commercial buildings and its impact on the issue of resource use and circular economy

An element of Echo Investment's strategy for commercial projects (primarily office buildings) is the certification of such projects under the international BREEAM system. More information about the BREEAM system can be found in disclosure E1-1.

In 2024, two office buildings by Echo Investment received BREEAM certification: React in Łódź and Brain Park C in Kraków.



Implemented solutions related to the issue of resource utilization and circular economy



React in Łódź

- **the monitoring of waste from the construction period:** the preparation of a waste generation plan with a description of the types and quantities of waste, as well as detailed reporting on the collection, recycling, and disposal of waste;
- **the improvement of the amount of waste sent for recycling and reuse by at least 35%** in relation to the national indicator. As much as 96% of the waste generated during construction was recycled and reused.

The above issues affect contractors on construction sites (higher level of the value chain).

Expected results of implementing the above-described activities:

- the reduction of the consumption of materials and primary raw materials in construction process;
- the provision of better quality and efficiency in connection with waste segregation.

Brain Park C in Kraków

- **the monitoring of construction waste:** the preparation of a waste generation plan with a description of the types and quantities of waste, as well as detailed reporting on the collection, recycling, and disposal of waste; and
- **92% of waste generated during construction was recycled.**

The above-mentioned activities concern two indicated office projects located in Łódź and Kraków. They influenced the design and construction processes (higher level of the value chain) and will have an impact on management and end users (lower level).



Waste management in managed buildings and own offices

The Group's own operations do not constitute a significant source of waste. However, monitoring and managing municipal waste is increasingly important for tenants of office buildings constructed by Echo Investment. In current market practice, managers do not weigh municipal waste from managed properties, but rely solely on aggregate information provided by the recipients of such waste.

In response to tenants' needs, Echo Investment will implement a waste weighing system in the Brain Park office complex in Kraków in 2025. This will be a pilot project which, after successful testing, will be implemented in other Echo Investment office buildings, as well as in buildings leased by the Group for its own needs. The initiative will involve end users and building managers (lower level of the value chain) and, after a successful pilot program, will be implemented in all of the locations of the Group (own offices and managed office buildings) from 2025.

Measuring the amount of waste produced will enable the Group to develop strategies for effectively reducing waste production in the future.

Waste management on construction sites — new obligations for contractors

The Group will prepare for the introduction of new reporting obligations for contractors regarding, among other things, the waste segregation threshold on construction sites. This is due, among other things, to the amendment of the Waste Management Act and concerns the segregation of waste into the following fractions: wood, metals, glass, plastics, gypsum, and mineral waste. In 2025, the Group will introduce relevant provisions in contracts with demolition contractors, shell contractors, and general contractors, which will require them to provide information on the tonnage of waste transferred, broken down into fractions, and on selected processes for the management thereof. The aim of this measure is to obtain as much real data as possible regarding the weight and fraction of waste generated, resulting in better quality data.

The Group's resources with regard to the use of resources and circular economy

The Group's resources are primarily the expertise and know-how of its employees and associates, as well as specialists whose work the Group uses. These are primarily engineers and designers. Their approach to specific issues related to the use of resources and the circular economy is developed individually for each development project.

E5-3

Goals related to resource use and circular economy

The Group's policy goals with regard to resource use relate to waste management, including preparing waste for appropriate treatment. In this regard, Echo Investment Group's goal for 2024 was to achieve a 70 percent rate of on-site segregation of construction waste directly on construction sites (calculated by the weight of the waste). The goal pertained to the outflow of resources (waste) and was related to the second and third levels of waste management (preparation for reuse and recycling). The Group's goal contributes to minimizing the use of primary raw materials, although the Group is not typically the entity directly benefiting from the reduction of primary raw material consumption. Such goal also indirectly contributes to increasing the rate of material use in a circular economy. The Group's goal does not relate to the sustainable sourcing and use of renewable resources or other issues related to resource utilization or circular economy.

The goal of waste segregation on construction sites is set annually by the Management Boards of Echo Investment S.A. and Archicom S.A. (for their respective groups) based on the ongoing analysis of contractors' capabilities, legal and regulatory requirements, the achievement of the relevant goals in the previous year, and the conclusions and insights drawn in relation thereto.

Segregated waste is sent to specialized companies that prepare it for further use by other entities.



The level of segregation on the Group’s construction sites in 2024 was 91 percent. The goal for 2025 is also to segregate 70 percent of waste on construction sites across the Group’s companies. This is an indicator based on the ratio of segregated waste to the total mass of waste produced, counted by weight.

The waste segregation target in relation to construction sites is voluntary and has been internally adopted within the Group, and was not set as the result of any consultations with any external stakeholders. Such target does not directly relate to increasing the design of buildings in a circular economy.

The Group monitors the effectiveness of its policies and actions taken to address material impacts, risks and opportunities related to resource use through its ongoing reporting of waste volumes created on construction sites, and the degree of waste segregation.

**91%** this is the percentage of waste generated on the Group’s construction sites that has been segregated on-site

**70%** this is the target for 2025



E5-5

Resource outflows

The Group's key products are buildings with various functions: residential, office, commercial, and collective accommodation (rental apartments, student dormitories). The Group does not have a policy in regard to designing and constructing buildings in accordance with the principles of circular economy, but it does apply adequate solutions, primarily due to their economic rationality, as well as growing public awareness of sustainability issues. In particular, this concerns the durability of buildings, the possibility of repairing them, dismantling their components and reusing them in construction or renovation processes.

The design and construction of the Group's buildings (products) use technologies and solutions that support circular economy:

- the use of durable, high-quality local materials that can be reused after the relevant building has been demolished;
- the use of durable, repairable equipment with a long expected service life;
- the minimization of waste generation; and
- the separation of waste on construction sites.

The construction of buildings generates significant amounts of waste, which, in accordance with the Group's policy, is separated directly on construction sites. The separation system and the operation thereof are described in disclosure E5-2.

The Group does not have information on the extent to which materials from the demolition of buildings constructed by the Group can be recycled or reused.

The standard service life of buildings is 60 years. This assumption is used in the Life Cycle Analysis (LCA) in the European Level(s) methodology, as well as in Polish design regulations (concerning building structures).

The structure is the most durable part of a building and determines how long it can safely fulfill its function for its users. Other parts of a building are designed for shorter periods (e.g. installations for 30 years). Individual parts or installations of a building can be replaced, maintained, or repaired. However, the Group is unable to estimate which parts of a specific building will require maintenance, repair or replacement during its life cycle, as wear and tear is influenced by many factors beyond the Group's control, such as the way in which the building is used.



### Hazardous waste

The hazardous waste collected from the construction sites of the Group mainly consists of foam, adhesive and sealant packaging, and small amounts of asbestos. The first category of waste is handed over to specialized companies that deal with its disposal or neutralization. Asbestos only arises in demolition processes (it is not used in construction) and is collected and disposed of by specialized companies.

Another type of hazardous waste is roofing felt, which is usually collected by roofing suppliers for reuse in the case of waste from new material. Demolition roofing felt is usually handed over to specialized companies that recycle or dispose of it.

The Group carries out soil contamination tests on its construction sites. If contamination is found, the soil is remediated: the contaminated soil is removed and handed over to specialized companies that deal with its neutralization. Such soil is classified as waste.

### Construction site waste in 2024

Category	Quantity (in tonnes)
Total amount of waste produced on construction sites	42,662.3
Total amount of waste that has been diverted from disposal (i.e. prepared for reuse)	31,919.2
Total amount of construction waste that has not been prepared for reuse (not separated at construction sites)	3,094.2
Total amount of hazardous waste	7,649.0
• including mainly chemical and other types of packaging	11.8
• including land for remediation	7,637.2

The total amount of waste generated on construction sites includes construction waste (sorted and unsorted), hazardous waste (usually chemical packaging), and soil to be remediated.

Waste that has been sorted on construction sites, with the exception of mixed waste, is considered to be waste that has been avoided.

Hazardous waste that is sent for disposal is chemical packaging and soil that is to be remediated.

Waste data is based on information from contractors and sub-contractors on construction sites. This data is regularly forwarded to the persons responsible for health and safety and environmental reporting on construction sites (usually Group employees) and then entered by them into the internal IT system, which aggregates such data. The Group requires its construction sites to segregate waste into wood, metal, rubble, and unsorted waste, as well as hazardous waste and soil for remediation.

The Group is unable to specify the amount of waste that has been diverted from disposal, broken down by the type of recovery process, sent for disposal, or broken down by the type of disposal method. The Group does not generate radioactive waste.

The data has not been externally verified.



3

For People



## For People

We aspire to be a just, fair, and stable employer. We value our employees' competencies and want to utilize their potential, give them opportunities for development, and provide them with space to better themselves outside of the workplace. We take responsibility for all of the people who work in our offices, as well as on our construction sites, in particular, their safety, health, and well-being.

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 guarantees that the places we design for living, working, and leisure fully provide for them.



### Our ambitions by 2030:



#### Equal opportunities and stable working conditions for employees of Echo Investment and Archicom:

- equal access to promotions: women and men will each hold 45-55 percent of senior management
- the average number of unused leave days per person at the end of the year will drop to 10
- 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
- achieving gender pay balance for similar positions, with comparable scopes of responsibility.

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

- zero fatal accidents
- the implementation of social facility standards on all construction sites
- the measuring and increasing satisfaction of construction workers
- the preparation and implementation of rules for handling complaints from neighbors.



## Group's own employees

S1



SBM-2 related to S1

The manner of considering the interests, views, and rights (including respect for human rights) of individuals belonging to the Group's own workforce in its strategy and business model has been detailed in the ESRS 2 SBM-2 disclosure.

SBM-3 related to S1

In accordance with the analysis conducted by the Management Boards, the actual and potential material impacts of the Group on employees, as defined in the ESRS 2 IRO-1 disclosure, which arise from the Group's strategy and business model and are connected to them, relate to providing fair and equitable working conditions, opportunities for professional development, safety, equal opportunities, and stability, including work-life balance.

The Group's strategy and business model provide for the implementation of development projects using specialized technical, legal, financial, managerial, and other expertise. The Group operates in a competitive market that undergoes regular economic cycles. To maintain the ability to execute its strategy within the adopted business model, as well as its large scale of operations, the Group requires a strong, competent, and motivated team. The ability to sustain such a workforce depends solely on the Group's policies and actions.

The main categories of employees influenced by the Group include those employed under employment contracts (described in the S1-6 disclosure) and individuals performing work under other agreements (described in the S1-7 disclosure). The Group has not identified any category of employee (individuals with specific characteristics, working in particular contexts, or performing specific activities) that may be more vulnerable to harm.

In the double materiality assessment, low diversity in managerial and supervisory positions was disclosed as a significant negative impact on the Group's own workforce. This impact is not widespread or systemic in the context of the Group's activities.

In the opinion of the Group's Management Board, actual and potential impacts on its own workforce do not stem from its strategy or business model, but are taken into account therein. All disclosed impacts on the Group's own workforce pertain exclusively to Poland — the Group does not operate in other markets.

The Group has not developed a transition plan aimed at reducing negative environmental impacts or increasing the ecological and climate-neutral nature of its operations; therefore, it has not assessed the impact of such a plan on its own workforce.

The Group assess that the child labor and forced labor within the Group's own workforce do not exist. The scope of disclosed information covers all individuals belonging to the Group's own workforce, as defined in ESRS 2.

Detailed information regarding the assessment of the materiality of individual topics and subtopics, their impact on the strategy, business model, value chain, and operations, as well as their effects on people and the environment, financial consequences, time perspectives, and the Group's response, is provided in the ESRS2 SBM-3 disclosure in the chapter on general disclosures.



## Policies related to own workforce

SI-1

The rights and obligations of the Group's employees are defined in the following documents and policies:

- the Code of Conduct;
- the whistleblowing procedure;
- labor regulations and their appendices ("Equal treatment in employment" - in Echo Investment's companies, and the "Anti-mobbing and discrimination policy" - in Archicom's companies);
- remuneration and bonus regulations;
- remote work policies;
- other.

These documents, particularly the labor regulations, mandate equal treatment and the protection of the Group's employees, regardless of gender, age, level of functional capacity, race, religion, nationality, political beliefs, union affiliation, ethnic origin, creed, sexual orientation, or type of employment. They also prohibit bullying and sexual harassment.

The Group is in the process of adapting its policies to meet ESRS requirements, and therefore not all MDR-P points have been addressed.

■ Responsibility for material issue management: HR Director

## Anti-discrimination policies

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

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

In its Code of Conduct, the Group states that it does not tolerate any instances of discrimination and ensures equal rights and opportunities for all, regardless of race, skin color, gender, nationality, religion, ethnic affiliation, or other aspects of diversity. Although characteristics such as ethnic origin, sexual orientation, gender identity, disability, age, political views, social background, and other traits susceptible to discrimination under EU regulations and national laws are not explicitly listed, according to the Group's policy, all of these are afforded the same level of protection.





## Safety policy

The vast majority of the Group's own employees work in offices and are not exposed to significant life and health risks. They are all covered by a safety assurance system defined by OSH and the internal safety policy. The system is certified according to the ISO 45001 standard and is audited by an external entity.

**In 2024, no workplace accidents were reported among the Group's own employees.**

The Group does not have separate policies exclusively aimed at preventing cases of direct or indirect discrimination (including harassment), promoting equal opportunities, or other ways of enhancing diversity and social inclusion. These matters are managed based on the corporate governance documents mentioned above.

The above-mentioned documents also address issues such as promoting equal opportunities and actions to enhance diversity and social inclusion.

The Group does not have specific commitments related to the social inclusion of particularly vulnerable groups among its own employees.

The policy based on the above-mentioned documents and principles ensures compliance with all legal and ethical requirements related to the Group's employees and their impact on the organization, as well as maintaining an appropriately staffed and qualified workforce to carry out its business activities.



The primary objectives of the Group in managing its own workforce, including both full-time employees and persons who provide services to the Group but not being its employees:

- aligning employment levels with business needs in the context of the Group's business objectives for a given year and in the longer term;
- maintaining employment stability within the Group.

In 2024, there were no significant changes in the Group's policies aimed at managing significant impacts, risks, or opportunities related to its own workforce. Echo Investment and Archicom updated their Codes of Conduct. This action did not introduce changes in regard to the rights and obligations of employees or other stakeholders, as it was of an organizational nature. The Codes refer to International Labour Organization conventions but do not address the UN Guiding Principles on Business and Human Rights or the OECD Guidelines for Multinational Enterprises.



## Compliance with human rights

The Group ensures respect for human rights, including labor rights, for its own workforce.

A key document relating to ethics and ensuring that human rights are respected among the Echo Investment Group's own staff is the Code of Conduct. It emphasizes the Group's commitments to human rights that are particularly relevant to its own workforce: the requirements of respect and fair working conditions, compliance with conventions of the International Labor Organization, ensuring the right to whistleblowing or training, and prohibits forced or compulsory labor, child labor, illegal employment, violence and discrimination. The Code of Conduct does not address the issue of human trafficking, as it has not been identified as a significant risk in the Group's operations. The Code also does not refer to the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, or the OECD Guidelines for Multinational Enterprises.

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 individuals providing services for the Group — primarily construction, supervision, security, cleaning services, etc. The main purpose of this document is to prevent accidents at work.

The Group's policies related to the observance of labor rights apply to all of the Group's own employees (covered by the S1-6 disclosure), as well as those providing their services for the Group (S1-7).

According to the Group's general approach, ensuring respect for human rights applies to both its own employees, hired under employment contracts, and individuals providing its services for the Group under other types of agreements.

### Diversity Charter



In 2024, Echo Investment and Archicom submitted applications to join the Diversity Charter initiative. This is an international initiative promoting diversity, equality, and inclusion in the workplace, and joining it signifies a voluntary commitment to implementing principles related to respecting diversity and combating discrimination. Both companies will become signatories of the Diversity Charter in 2025, gaining support in promoting a culture of diversity and committing to actions that strengthen it.

## Remedies for human rights violations

The Group has a whistleblowing and whistleblower protection system, which was updated in 2024 in connection with the enactment of the Whistleblower Protection Act of June 14, 2024. This system allows its own employees to report — including anonymously — violations of human rights, for example, labor rights. Each reported case is analyzed and explained, in accordance with internal procedures, by a commission appointed for this purpose on an ad hoc basis. Once a violation of law or internal rules is identified, the 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 violated 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, and the degree of the employee's guilt, these sanctions range from admonishment, reprimands, and fines to disciplinary dismissal. If a crime is suspected, the Group reports the case to law enforcement agencies.



## Procedures for working with own employee resources and employee representatives

SI-2

The Group does not have specific policies or procedures regarding cooperation with individuals within its own workforce but conducts such cooperation based on the principles outlined in the following documents:

- the Labor Code;
- the Code of Conduct;
- work regulations and remuneration regulations.



## Employee representatives

As part of the due diligence process, the Group collaborates with employees on significant, actual, and potential positive or negative impacts that affect or may affect them, through employee representatives elected by them in free and secret ballots. The opinions and recommendations of employee representatives are taken into account by the Management Boards in decision-making processes.

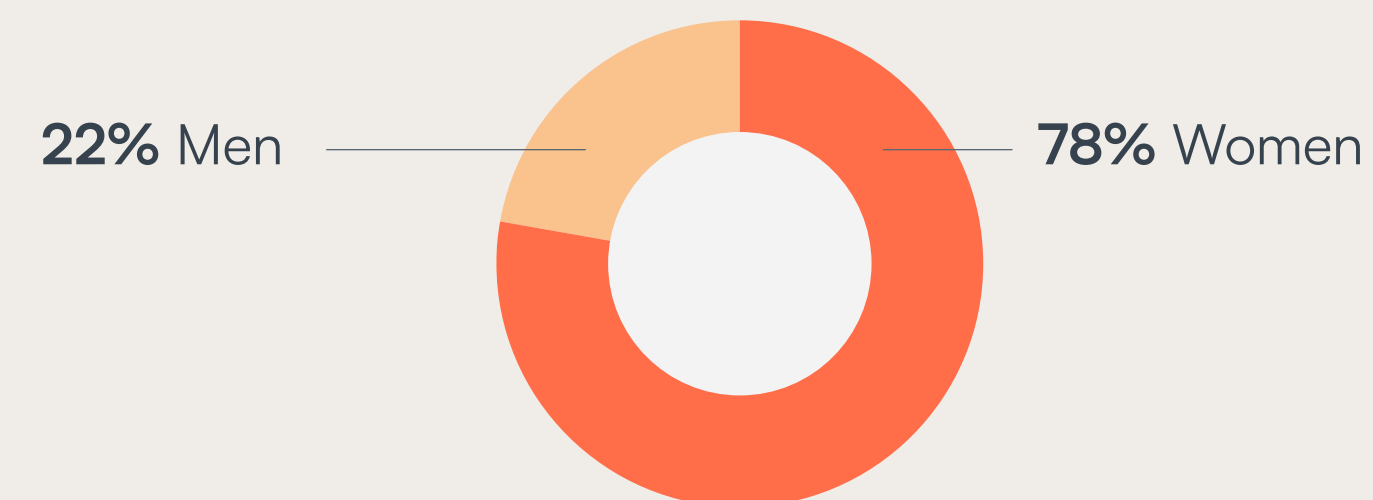
As at 31 December 2024, there were six companies in the Group that, due to the size and nature of their employment and legal requirements (Labor Code, Act on the Company Social Benefits Fund, Act on Informing and Consulting Employees, Act on Employee Capital Plans, and Act on the Protection of Persons Reporting Violations of Law), had employee representatives:

- Echo Investment S.A.;
- Service Hub Commercial — Grupa Echo Sp. z o.o. Sp.k.;
- Service Hub Sp. z o.o.;
- Archicom S.A.;
- Service Hub Resi Sp. z o.o.;
- CitySpace Management Sp. z o.o.

As at 31 December 2024, the Group companies with employee representatives employed 659 people under employment contracts in total, meaning that 100 percent of the Group's employees under employment contracts and 90 percent of all of the Group's own workforce are represented. Representatives, as a rule, represent employees employed by a given company under

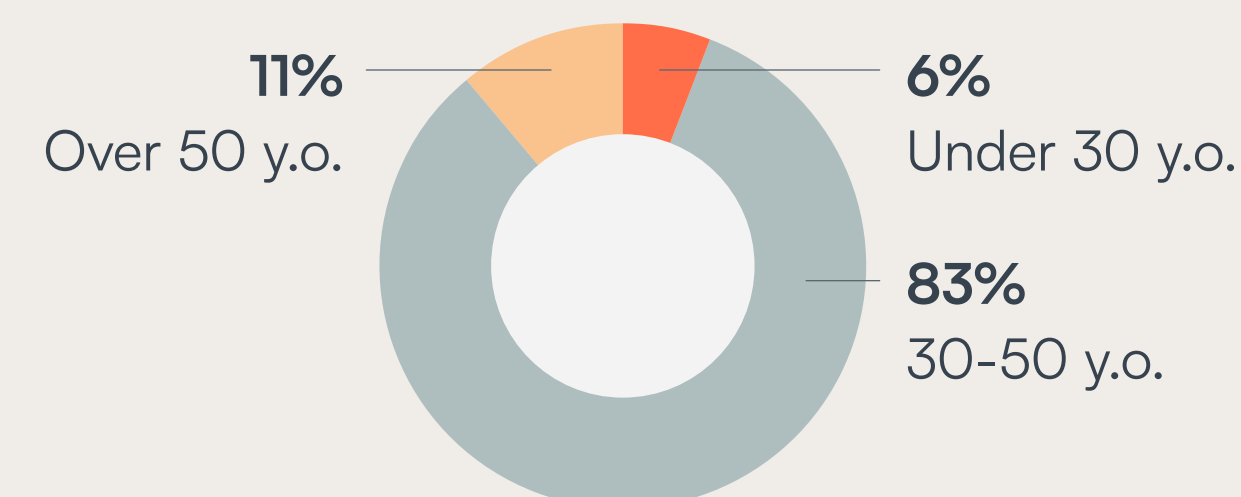
an employment contract; however, in their decisions they also take into account the interests of those providing work under other contracts — in particular — civil law contracts.

### Diversity of employee representatives in the Group by gender [in %] - as at 31 December 2024



The Group has not recorded any cases of unreported gender or individuals identifying with a gender other than male or female.

### Diversity of employee representatives in the Group by age [in %] - as at 31 December 2024





Employee representatives of individual companies were elected in free elections for four-year terms in 2024.

The Group 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). Dialogue with employee representatives is initiated in response to legal requirements and stakeholder requests. The Group does not conduct regular dialogues with employee representatives. The topic of consulting with employees regarding the impact on the strategy and business model is detailed in the report, in the general disclosure SBM-2. Despite the lack of a formalized cooperation procedure, the Group's Management Boards strive to cooperate with employee representatives and take into account comments and issues raised by them.

### Responsibility for material issue management: HR Director

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 such cooperation by way of:

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

The Group does not take steps to gain insight into the opinions of its own employee resources 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 the HR Director's duties, as part of the broader scope of responsibility. The HR Director participates in all strategic processes in the Group and their voice is included in strategic decisions. One of the most important duties of the HR Director 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 Group's strategy and business model and have a direct, significant impact on labor issues, including if they pose a risk to respect for human rights.

There are no trade unions operating within the Group, and employees of the Group's companies are not covered by any collective labor agreements.





## Topics consulted with employee representatives in 2024

Topic	Scope	Consultation results
Changes in the regulations of the Company Social Benefits Fund (ZFSS)	All companies except CitySpace	Approval obtained for the proposed changes.
Introduction of the ZFSS	CitySpace Management and Service Hub	Approval of the ZFSS operating principles.
Establishing income thresholds for the ZFSS	All companies	Positive opinion received on the prepared proposal. Review of communication tools for employees (calculator). The proposed changes were incorporated.
Joint management of ZFSS funds: inclusion of a new company in the current agreement effective since 2021 between two companies.	Echo Investment S.A., Service Hub Commercial — Echo Group (parties to the current agreement), and Service Hub	Consultations concluded with a signed agreement.
Updating the procedure for reporting irregularities and whistleblower protection.	All companies except Service Hub	Incorporation of proposed modifications to the planned changes in the procedure and the communication thereof.
Changes in work regulations — modification of the working time system (flexible start time)	Service Hub Commercial — Echo Group	Consultations on the prepared solutions and the signing of an agreement.
Introduction of work regulations with an agreement on flexible working hours	Service Hub	Positive opinion on the prepared proposals.
Changes in remuneration regulations concerning the ZFSS contribution	All companies	Approval of the proposed solutions.
Introduction of a benefits cafeteria	CitySpace	Opinion obtained on the presented offer.
Discussion of health and safety data at construction sites and the communication of these issues — meeting with the head of the OHS and Environmental Protection Department	Archicom	Information presented.



## Processes for remedying adverse impacts and channels for reporting concerns by own workforce resources

S1-3

### Reporting irregularities and handling reports

The Group has implemented efficiently operating channels for reporting irregularities, handling reports, and protecting whistle-blowers, which are detailed in Chapter 4 of this report, in disclosure G1-1.

Responsibility for the management of material issues: The Director of the Legal Department (Echo Investment S.A.) and the Member of the Management Board responsible for compliance (Archicom S.A.)

### Promoting whistleblowing channels

The Group promotes its 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). Familiarization with the methods for reporting irregularities is also an integral part of the onboarding process for every new employee.

The Management Board of the Group assesses that the awareness among its own employee resources regarding the ability to report irregularities is high and sufficient. This is due to the high percentage of both direct employees and individuals providing services under agreements other than employment contracts who have completed ethical training and passed the relevant exam (see disclosure G1-3), as well as the fact that inquiries and reports are received by the Group through designated channels.

The whistleblowing policy was updated in 2024 and was communicated to employees and associates through the intranet. The update expanded the scope of individuals eligible to use the whistleblowing system by, inter alia, construction site workers and contractors. As a result, Echo Investment and Archicom have made a dedicated form available on their websites.

S1-4

### Actions concerning material impacts on the Group's own workforce

Actions regarding impacts, risks, and opportunities related to the Group's own workforce encompass both the Group's employees and individuals within its workforce who provide their services under other types of agreements. Work within the Group, in terms of exposure to various risk factors, is similar for all of the Group's employees. The Group and its operations are concentrated in Poland, where the culture of employment and work, as well as legal requirements and their enforcement, are uniform.

In the double materiality assessment, the Group identified one employee group within its workforce that is more vulnerable to harm than others — women (in the context of equal pay and representation in governing and supervisory bodies).

The Group is working on aligning its actions and goals to meet the disclosure requirements set by ESRS MDR-A and MDR-T.





## Key significant impacts, risks, and opportunities related to the Group’s own workforce and associated actions

Issue	Actions Taken, Planned, and Ongoing
Employment stability over the long term	<ul style="list-style-type: none"><li>• Continuous monitoring of employee turnover.</li><li>• Regular comparisons of salaries to market standards.</li></ul>
Employee Dialogue	<ul style="list-style-type: none"><li>• Conducting elections in 2024 for employee representatives in all of the Group’s companies in accordance with regulatory obligations.</li><li>• Consulting employee representatives on all matters required by labor law and other regulations.</li></ul>
Work-Life Balance	<ul style="list-style-type: none"><li>• Introducing an additional benefit — financial support for employee vacations.</li><li>• Offering employees a benefit platform with various options for leisure activities or the development of personal interests.</li></ul>
Low Diversity in Managerial and Supervisory Positions	<ul style="list-style-type: none"><li>• Training programs to strengthen employee competencies.</li><li>• A planned managerial competence enhancement program for 2025.</li><li>• Training for the boards and supervisory councils of Echo Investment, Archicom, CitySpace, and Resi4Rent regarding managing ESG issues, including promoting diversity.</li></ul>
Training and Skills Development	<ul style="list-style-type: none"><li>• Implementing training programs.</li><li>• Internal educational program 'Echo-School,' with project continuation planned for 2025.</li><li>• Launching the second edition of the internal mentoring program, with continuation planned for 2025.</li></ul>
Measures to Prevent Workplace Violence and Harassment	<ul style="list-style-type: none"><li>• Updating the whistleblowing and whistleblower protection policy in 2024.</li><li>• Expanding the pool of potential whistleblowers.</li><li>• Responding to reported irregularities in employee matters in accordance with the adopted policy.</li></ul>
Ensuring Pay Equality Between Women and Men	<ul style="list-style-type: none"><li>• Establishing a methodology for analyzing the pay gap — adjustment of assumptions made in 2023.</li><li>• Determining the baseline level in line with the new methodology.</li></ul>

\*An issue considered material by the Group that was not considered material by stakeholders in a double materiality assessment.





5.7 years 

— this is the average length of service of  
an employee at Echo Investment Group

Principles used to calculate the level of the above metric



In this disclosure, the following was taken into account:

- arithmetic average of seniorities;
- individuals who were employees of the Company on 31 December of the reporting year (according to the S1-6 disclosure);
- employees with long-term absences (maternity leave, parental leave, extended parental leave, sick leave of more than 30 days, pregnancy-related sick leave);
- employees holding employment contracts, irrespective of their duration (temporary or permanent) or working hours (full-time or part-time);
- employees holding employment contracts and at the same time another contract — according to the duration of the employment contract;
- those employed under multiple contracts — according to the date of the conclusion of the oldest contract.

The principle that the seniority of people who combine full-time positions at Echo Investment and Archicom is taken into account according to the date on which the oldest contract was adopted.

S1-5

The Group's key objectives in managing its own workforce are derived from the Echo-Archicom 2030 ESG Strategy and are outlined in the introduction to this chapter ("Our Ambitions by 2030"). Achieving these objectives requires long-term effort. Details about the implementation stage of individual goals are presented in the S1-5 disclosure.

The Group manages impacts related to its own workforce through a professional HR team responsible for the following areas:

- recruitment priorities and strategy;
- employee compensation and benefits;
- employee training and development;
- administrative handling of employee matters (leave, sick days, payroll, taxes, and others).

The HR department operates with an annually allocated budget for each of these areas and is responsible for the efficient and purposeful expenditure thereof.

The responsibility for preventing workplace violence and harassment, including handling reports and protecting whistleblowers, lies with the Director of the Legal Department.

The effectiveness of the Group's initiatives aimed at ensuring positive impacts on its own employees is monitored and evaluated through key management indicators across HR areas, such as employment levels, training programs, recruitment efficiency, and the adequacy of compensation relative to roles and employee

performance. Identifying appropriate actions to address specific actual or potential negative impacts on its workforce is the responsibility of the HR Director, based on professional expertise and experience. The HR Director is also responsible for analyzing whether the Group's practices do not cause or contribute to significant negative impacts.

The HR Director regularly informs the Management Board about the following workforce-related issues:

- salary analysis and competitiveness (1—2 times per year);
- ongoing updates on employee dialogue, issues raised by employees or their representatives, and OHS topics,
- monitoring of leave utilization;
- analysis of gender pay gap levels and access to managerial positions;
- monitoring and reporting on the implementation of the employee development program.

The Group has not yet developed a plan for transitioning to a greener, climate-neutral economy and, therefore, has not assessed a detailed impact of implementing such a plan on its workforce. However, based on the current state of knowledge, the Group's Management Board does not anticipate any significant impacts from implementing the transition plan in relation to its workforce.



## Objectives related to managing material adverse impacts, enhancing positive impacts, and managing material risks and opportunities

Objective	Planned timeline	Implementation in 2024
Maintaining workforce stability in the Group	Annual	Considering the turnover indicators, the Group's Management Board assesses that employment stability within the Group was successfully maintained in 2024.
Eliminating pay gaps between women and men in similarly valued positions	2029	In progress, with a slight delay in implementation that does not jeopardize the achievement of the goal.
Achieving gender parity in higher managerial positions	2025	In progress
Enhancing work-life balance by encouraging employees to take vacation leave (maximum of 10 days of unused leave per employee)	2026	In progress
Achieving gender parity in the governing bodies of Echo Investment S.A. and Archicom S.A.: women will constitute at least 40 percent of the Supervisory Boards of each of the mentioned companies, or at least 33 percent of the Supervisory Boards and the Management Boards of each company combined.	June 2026	The Management Boards regularly raise this issue in the Supervisory Board meetings, as it is their responsibility to determine the composition of the Management Boards. In 2024, no changes made.
Ensuring compliance with the Labor Code and other legal regulations regarding employee matters	Annual	No confirmed cases of non-compliance.

The above goals are directly related to the identified significant impacts, risks, and opportunities concerning the Group’s own employees. They pertain to long-term employment stability, equal opportunities, and work-life balance.

The Group regularly monitors the effectiveness of undertaken actions and progress in achieving set goals through periodic reviews and reports issued to the Management Board (depending on the goal and necessity — from one to four times a year) as well as working meetings of the Steering Committee with individuals responsible for implementing specific objectives.

The presented goals apply exclusively to the company's own workforce and do not include any restrictions in this regard.

The Group did not cooperate with its own employees or employee representatives in setting objectives related to managing material impacts, risks, and opportunities concerning employee resources. The Group also did not engage in collaboration for tracking performance, achieving the established objectives, or identifying conclusions and improvements in this area.

The Group is working on aligning its goals to meet the disclosure requirements set by ESRS MDR-T.



S1-6

S1-7

Methodological assumptions regarding disclosures related to own workforce resources S1-6 and S1-7	Employees combining employment contracts in different companies of the Group	Employees combining employment contracts and other contracts within the Group
<p>The data regarding the Group’s own workforce has been prepared and presented in such a way as to reflect the state and conditions of employment to the highest degree possible and to enable users of the sustainability statement to understand the key aspects of the issue as fully as possible. To this end, the Group has adopted a general principle of only presenting individuals once in regard to its reporting, even if they simultaneously belong to both its own employees and those individuals providing their services for the Group under contracts other than employment contracts, or if they provide work under several civil law contracts. This principle has also been adopted for the sake of consistency between the Group's and Archicom S.A.'s reporting. This approach is also used in in connection with financial reporting.</p> <p>Within the Group's own workforce disclosures, the number of employees is presented rather than the number of full-time equivalents.</p> <p>All information, unless otherwise indicated, is presented as at 31 December 2024.</p>	<p>Persons who are employed as part-time in different companies of the Group are presented as being employed only in the company where his/her amount of working time is the most significant. In the case of similar working hours in different entities of the Group, the employee will be assigned to the company with which he/she is more closely associated (seniority or responsibility). If such an assignment is not possible, the employee will be considered an employee of Echo Investment.</p> <p>If the total amount of working time in the different entities of the Group is full-time, the employee will be considered as full-time. If, after adding up the employment contracts in the Group, the working hours are less than full-time, the employee will be classified as part-time.</p> <p>Cases of individuals who combine part-time positions in different companies of the Group are few, and insignificant for sustainability reporting.</p>	<p>Persons employed in different companies of the Group on the basis of employment contracts and providing services on the basis of any other contracts are presented only as full-time employees (not shown in the number of people providing services the basis of other contracts).</p> <p>If the total amount of work time provided by such person to the Group is similar to that of a full-time employee, such person is presented as a full-time employee.</p>
		Employees on temporary contracts
		<p>The Group's approach is to hire new employees for a probationary period of three months, followed by a fixed-term period of 12 months. Such people are presented as employees on temporary contracts. After this time, employees are usually hired for an indefinite period.</p> <p>The S1-6 disclosure also covers employees who have had long-term absences (maternity leave, parental leave, extended parental leave, sick leave of more than 30 days, pregnancy-related sick leave) on 31 December of the reporting year.</p>



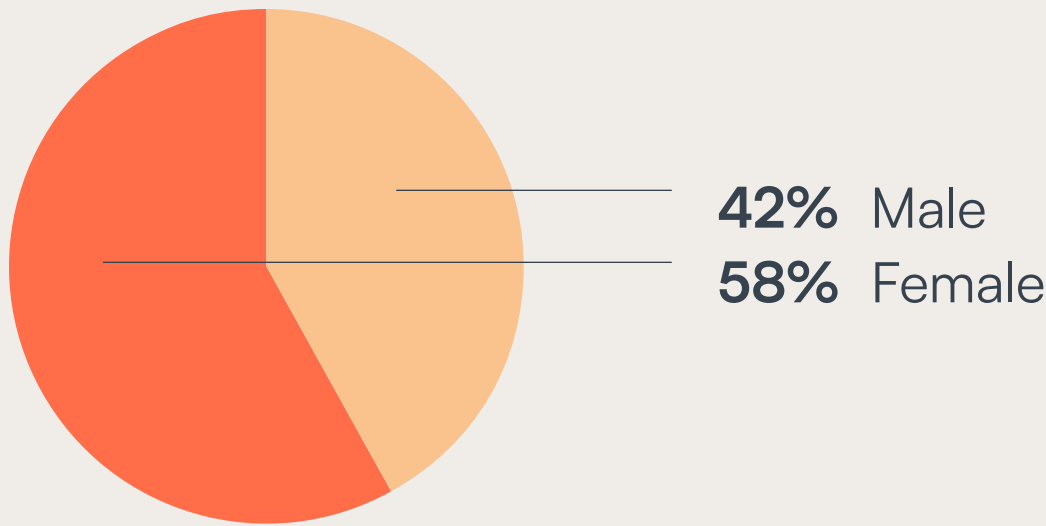


## Own employees

S1-6

Responsibility for the management of material issues: HR Director

### Total number of Group employees and by gender - as at 31 December 2024



Male	277
Female	383
Total	660

Ratio of the number of employees to the value of the Group's assets expressed in million PLN (x 100)	9.7
Ratio of the number of employees to the Group's net profit expressed in million PLN	42.3

### Employees of the Group by employment contract type and gender - as at 31 December 2024

	Male	Female	Total
Number of employees			
	277	383	660
Number of employees on permanent contracts			
	210	268	478
Number of employees on temporary contracts			
	115	67	182
Number of full-time employees			
	261	363	624
Number of part-time employees			
	16	20	36

### Own employees by age — as at 31 December 2024



Under 30 y.o.	124
30-50 y.o.	452
Over 50 y.o.	84
Total	660

### Employee turnover in 2024

Number of employees who left the Group	73
Turnover ratio	11%

The Group has not recorded any cases of unreported gender or individuals identifying with a gender other than male or female.





Principles used to calculate the level of the above metric

The employee turnover rate is calculated using the formula: (number of employees who left the Group voluntarily, due to dismissal, retirement, or death / total number of Group employees at the end of the reporting period) x 100%. In regard to the work rotation metric, the numerator is the number of employees who left the Company during the year and the denominator is the headcount as at 31 December of the reporting year.

In this disclosure, the following was taken into account:

- departures of employees throughout the reporting year;
- departures of all people who, at the time of termination of employment, held employment contracts, irrespective of their duration (temporary or permanent) or working hours (full-time or part-time);
- departures of employees who were simultaneously working on the basis of employment contracts and another contracts; and
- departures for all reasons (self-resignation, dismissal — including disciplinary dismissal, retirement, death of employees).

Furthermore:

- the departures employees who were employed in several part-time positions were counted as the departure of one person. This is particularly important in the case of people employed simultaneously at companies of the Echo Investment Group and companies of the Archicom Group; and
- those who changed their basis of employment from a contract of employment to another type of contract during the reporting year were included in the departures.

Individuals providing services to the Group under agreements other than employment contracts

S1-7

The Echo Investment Group engages individuals with whom it collaborates on an ongoing basis under agreements other than employment contracts. These are mainly skilled professionals and experts providing consulting services (e.g., lawyers).

All individuals performing work for the Group under agreements other than employment contracts provide their services in Poland.

People working for the Group on the basis of contracts other than employment contracts by contract type — as at 31 December 2024

Type of contract	Number of people
Self empolyed*	66
Performing permanent work on the basis of a contract of mandate	21
Provided by the employment agency	2
Total	89

\*primarily civil law contracts with sole proprietorships - consulting services.





## Diversity of senior management

S1-9

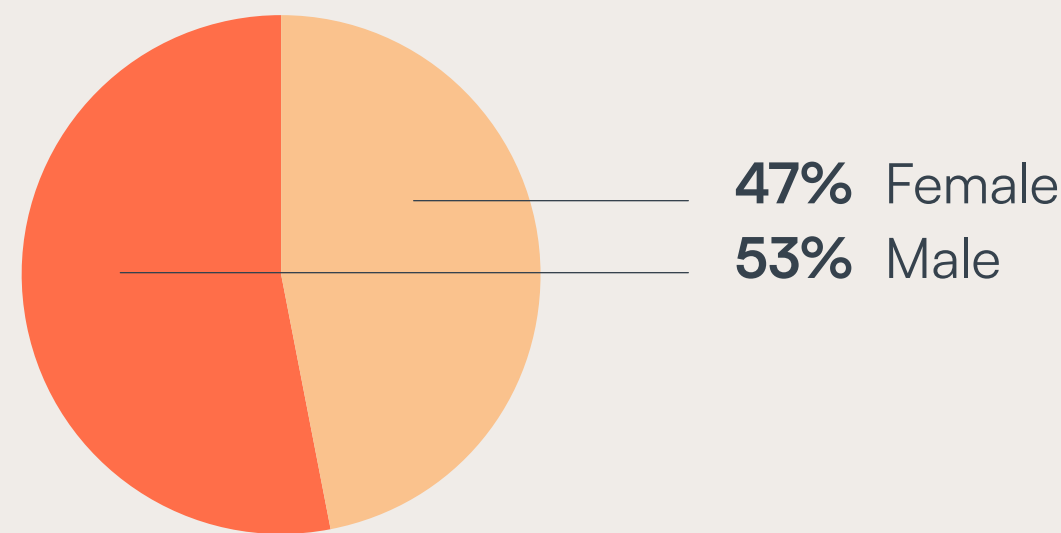
The top management in the Echo Investment Group consists of 32 individuals (19 from Echo Investment and 13 from Archicom). These are directors (managers) responsible for key functions in both organizations who have been classified in the 19th and 20th levels of job classification according to the Korn Ferry method.

This disclosure, in accordance with the S1-9 disclosure requirements, presents only those persons who are hired under employment contracts and are included in the S1-6 metric.

The top management did not include any individuals who provide services to the Group on the basis of contracts other than employment contracts (included in S1-7 disclosure).

The age structure of all employees is presented in disclosure S1-6.

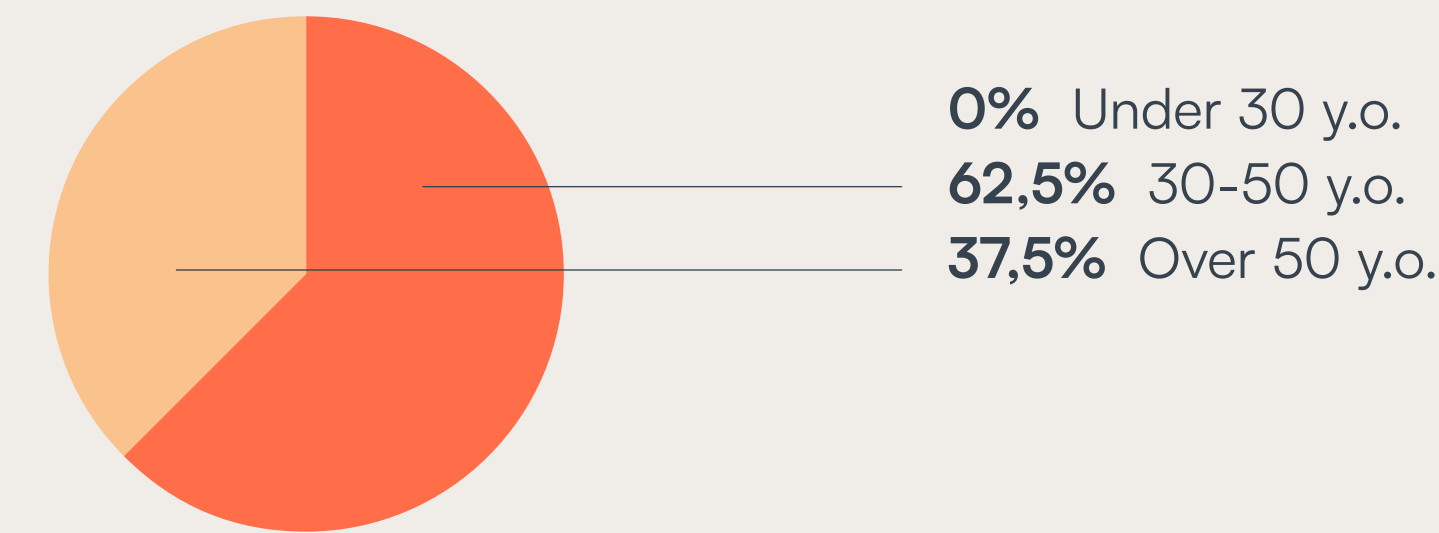
Diversity of top management by gender  
— as at 31 December 2024



Female	15
Male	17
Total	32

The Group has not recorded any cases of unreported gender or individuals identifying with a gender other than male or female.

Diversity of top management by age  
— as at 31 December 2024



Under 30 y.o.	0
30-50 y.o.	20
Over 50 y.o.	12
Total	32



## Training and skills development

S1-13

Responsibility for the management of material issues: **HR Director**

The Group does not have a written policy regarding employee training or the development of skills. A development plan is prepared annually to support the Group's business activities, its annual objectives, and its long-term needs.

### Training and education within the Group

We are dedicated to raising the competencies of our employees by using various methods 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 in a way that allows our acquired knowledge and skills to be applied in daily work.

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.

The HR priorities for 2024 included implementing the ESG strategy to support diversity, aligning salaries with market standards, and developing a methodology to measure the pay gap to achieve pay equity.

In 2024, the Group conducted 122 training sessions, which totalled 7,328 training hours.

The most important training sessions conducted in 2024 focused on diversity and teamwork, customer service and sales effectiveness, negotiation skills, and adaptability. The Group also carried out a series of training programs aimed at supporting managers in team management and performance optimization.

### Information on training hours for employees in the Group in 2024

Total number of training sessions conducted	122
Total number of training hours	6,461
Total number of training hours for men	2,665
Total number of training hours for women	3,796
Average number of training hours per employee	9.8
Average number of training hours per men	9.7
Average number of training hours per women	9.9

### Information on training hours for individuals providing services for the Group under agreements other than employment contracts in 2024

Total number of training sessions conducted	122
Total number of training hours	867
Average number of training hours per person	9.7



#### Principles used to calculate the level of the above metric

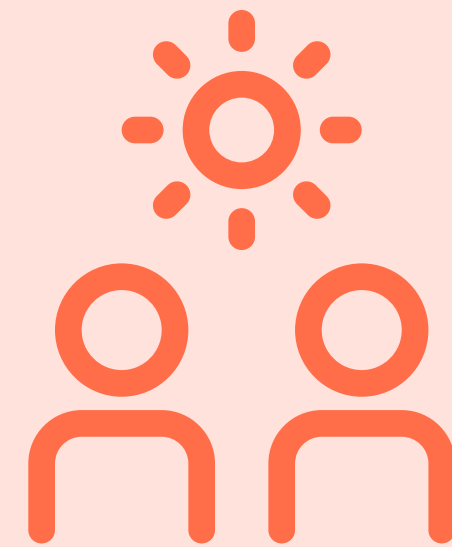
In 2024, the Group did not maintain a register of individuals participating in training sessions categorized into employees (S1-6 disclosure) and individuals performing work for the Group under other contracts (S1-7 disclosure). Instead, it only recorded aggregated data for both categories of own workers also by gender. For this reason, it presented data on training hours by allocating the appropriate proportion of hours to each employee group and then applying the same proportion to the training hours data by gender within the employee group. The Group's approach to training is similar for both categories of own workers, ensuring that this estimation does not significantly distort the overall picture.

The training data presented in the tables above do not include mandatory ethics training, onboarding training, OHS training, or training provided through the internal training platform "Echo School."



## Group mentoring program

One of the long-term goals of employee development within the Group is to support employee versatility, flexibility, and readiness to address various professional challenges. To this end, the Group runs an internal mentoring program that facilitates the exchange of knowledge and experiences across generations, functions, and companies within the Group. The program was initiated in 2023 at Archicom and was expanded in 2024 to include Echo Investment and CitySpace. The program was initiated in 2023 at Archicom and was expanded in 2024 to include Echo Investment and CitySpace. The program is overseen by Agata Rybarska, an internationally accredited mentor, business coach, and certified trainer.



## Supporting the growth of managers and their skills

We are committed to fostering the development of our managers and enhancing their skills. In 2024, we conducted a series of training sessions under the Manager Academy and, in collaboration with a new partner, developed the Become Manager program. This new course builds on the experience of the previously conducted Manager Essentials cycle and features a richer, more comprehensive curriculum. The program will launch in 2025.

### Become Manager

Following the 5-month Manager Essentials training series in 2023, Archicom decided in 2024 to expand and enrich the program both in terms of content and scope. The new, enhanced version, Become Manager, has commenced in January 2025.

The HR team, in collaboration with the ICAN Institute, has developed a 7-module training program for managers.

The programme goals are:

- establishing unified people management standards across the Group.
- managing low-performance employees.
- providing feedback and motivating employees.
- leading diverse teams.

### Manager Academy

In 2024, managers from the Echo Investment Group (including Archicom) participated in training sessions and webinars held under the Manager Academy. The diverse training topics addressed the needs of leaders and aimed to strengthen their competencies in key areas, including:

- setting and cascading goals.
- recruitment processes.
- labor law and handling mobbing issues.



## Let colors show who you are

The training based on so-called “color tests” completed by participants, which generates individual color profiles that reflect dominant personality traits and preferred communication styles. The results, presented as charts and descriptions, are discussed during the relevant workshops. Diagnosing color profiles supports the effective management of the organization and teams, as well as individual talents and employee predispositions. The pilot training, initially organized for the IT and Finance departments, proved so beneficial that Archicom decided to extend it to teams from other departments.



## "Echo School" educational platform

In 2024, further lessons were held as part of the internal educational platform entitled "Echo School". The employees and experts of the Group — specialists in various fields — as well as invited guests acted as teachers.

### Subjects of the lessons:

- ESG: the role of trees in the city;
- the recipe for a "destination" success: a guide to the architecture of the Towarowa 22 Project;
- the private student housing market;
- prefabrication in construction.





Personal development reviews

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.

According to the Group's internal processes, development discussions are planned for all Group employees and, in certain cases, also for individuals performing work for the Group under agreements other than employment contracts.

Work-life balance

S1-15

The Group's work-life balance policy is not a dedicated document, but it is driven by the law, internal regulations, and the ESG Strategy. It assumes raising the work-life balance level by using employees' accrued leave in a timely manner, and promoting longer leaves of absence. In addition, it aims to comply with legal requirements.

The key tools supporting work-life balance employed by the Group include:

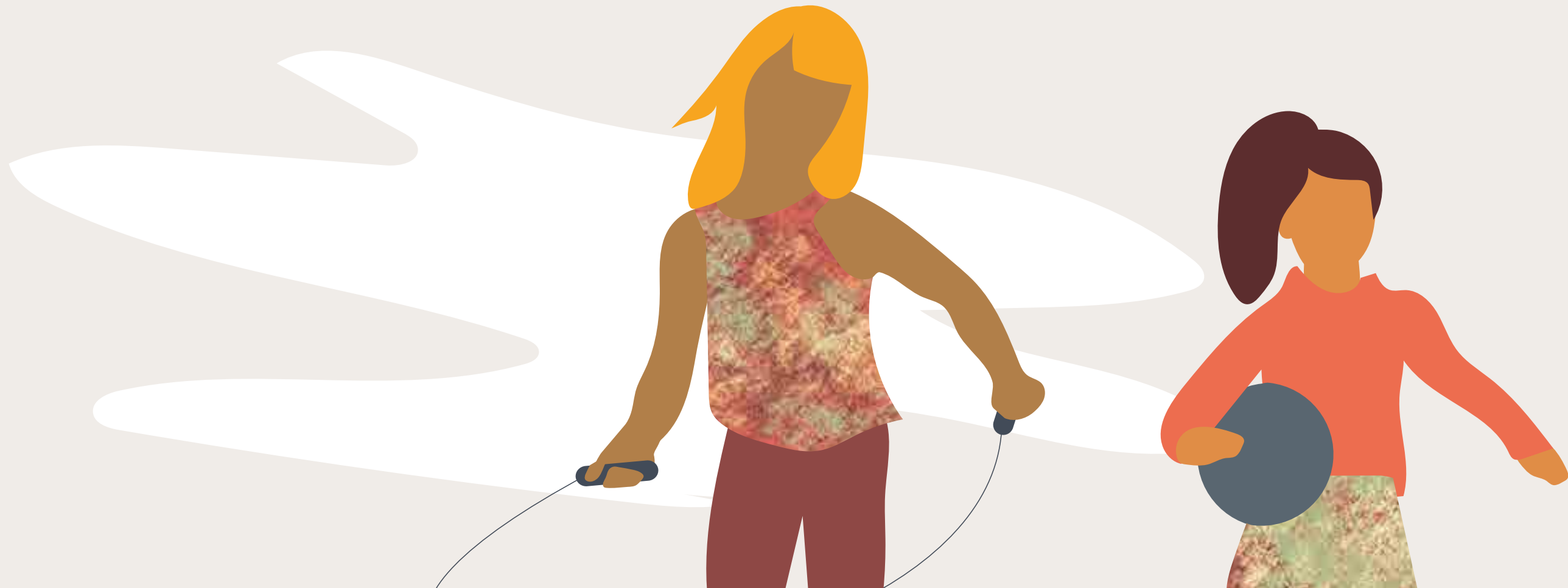
- annual leave;
- family leave (maternity, paternity, parental, caregiver);
- benefits and other initiatives.

Principles used to calculate the level of the above metric

Principles used to calculate the level of the above metric  
The denominator for the calculation is the total number of people employed on the basis of employment contracts as at 31 December of the reporting year (according to the S1-6 disclosure).

- In this disclosure, the following was taken into account:
- individuals working for the Company on 31 December of the reporting year;
  - individuals employed on the basis of employment contracts, irrespective of their duration (temporary or permanent) or their working time (full-time or part-time);
  - individuals employed on the basis of employment contracts and, at the same time, on the basis of another contract;
  - individuals employed on the basis of multiple contracts (each such person is counted as one employee with the full-time equivalent of the sum of all contracts); and
  - the principles provide that the length of leave for part-time employees is counted in working days in conjunction with the number of working hours (i.e. four hours' leave days are counted for one second full-time employee).

The statistics do not include employees who were absent for long periods of time on 31 December of the reporting year (maternity leave, parental leave, extended parental leave, sick leave of more than 30 days, pregnancy-related sick leave).





### Rest leave

One of the objectives of the Group's ESG Strategy is to increase the usage of rest leave by employees to benefit their well-being, recovery, and work efficiency. 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. According to the ESG strategy roadmap, as at 30 September 2024, there should be no employees in the Group with outstanding unused leave from 2023 or earlier. In reality, as at 30 September 2024, the average outstanding leave was 1.9 days.

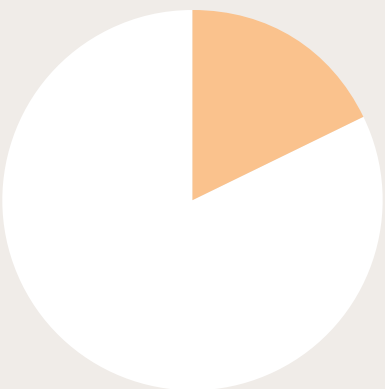
At the end of 2023, the average number of unused leave days per employee was 12 (excluding leave accrued by employees on long-term leave).



### Leave for family reasons

Based on the social policy in force in Poland and the Labor Code, all of the employees of the Group are entitled to family leave.

#### Employees who took family-related leave in 2024



18% Female



9% Male



14% of all employees

Female	70
Male	25
Total	95

#### Principles used to calculate the level of the above metric

The denominator for the calculation is the total number of people employed on the basis of employment contracts as at 31 December of the reporting year.

In this disclosure, the following was taken into account:

- family-related leave, i.e. maternity, parental, paternity (two weeks), leave to care for a family member (from a pool of 60 days provided by labor law); and
- employees who took leave during the reporting year,
- the continuation of parental leave after maternity leave is treated as a single period of absence.

Special leave related to family situations (funerals, weddings, birth of a child) are not included in the calculation.



## Adequate salaries and remuneration ratios

S1-16

### Employee salary determination proces

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 receive remuneration 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 receive higher remuneration. 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 relevant 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 an opportunity to receive. Bonuses directly related to sales are generally paid on a monthly or quarterly basis, while other departments (the vast majority of employees) received their annual bonus depending on the achievement of individual goals and the overall annual result of the organization.

### 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 certain 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 for the reduction of the pay differences between men and women who occupy similarly valued positions.

The HR Director, in consultation with the Management Board, is responsible for establishing compensation policies and reviewing salaries. The process is supported by external consultants, whose involvement ensures objectivity in job mapping and evaluation. Other stakeholders are not involved in the process.

### Pay gap in the Group — as at 31 December 2024

Average level of gross hourly pay of male employees (in PLN)	96.7
Average level of gross hourly pay of female employees (in PLN)	72.9
Pay gap (M/F) in percentage	25%



#### Principles used to calculate the level of the above metric

When calculating the pay gap, the following principles were applied collectively:

- full gross remuneration (basic salary, overtime pay, bonuses, benefits) was analyzed; only remuneration paid to employees in a given year was aggregated;
- only the remuneration of individuals who were employees on 31 December of the reporting year were taken into account;
- only the remuneration paid on the basis of employment contracts to all people included in the S1-6 disclosure (i.e. all those counted as employees, regardless of their amount of working time) were included; and
- the statistics do not include the remuneration of employees who were absent for a long period of time on 31 December of the reporting year (maternity leave, parental leave, extended parental leave, sick leave of more than 30 days, pregnancy-related sick leave).



The differences between the average salaries of men and women overall in the Group are due to the structure of employment and the local labor markets. A significant part of the workforce is composed of engineers, who are highly paid in the market. Taking into account the specifics of the labor market and the level of technical education in Poland, the overwhelming proportion of engineers are men. For this reason, the issue of equal remuneration within the Group should be analyzed on the basis of position valuation. It 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.

Principles used to calculate the level of the above metric

The same principles have been applied in this disclosure as in the calculation of the metric relating to average hourly remuneration (above).

The pay gap presented on the right is the percentage difference between the salaries of women and men (the ratio of the difference between men's and women's salaries to men's salaries).

The gender pay gap between the salaries of women and men holding similarly valued positions in the Echo Investment Group in 2024 (in %)

Role description	Job classification according to Korn Ferry	Gender pay gap (F/M)
Directors responsible for key functions	20	6%
Directors responsible for key functions	19	18%
Individuals who hold managerial roles, even if they do not manage a team, as well as directors responsible for key areas	18	3%
Individuals who hold managerial roles, even if they do not manage a team	17	13%
Individuals who hold managerial roles, even if they do not manage a team	16	-4%
Individuals serving in an expert role or as a team leader	15	-4%
Senior specialists, specialists, and junior specialists	14	2%
Senior specialists, specialists, and junior specialists	13	6%
Specialists and junior specialists	12	-1%
Specialists and junior specialists	11	-7%
Junior specialists	10	2%

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 Korn Ferry 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 target set for 2024 was achieved in eight out of ten examined employee groups.







Ratio of the total annual compensation of the highest-paid individual in the Group to the median total annual compensation for all employees (excluding the highest-paid individual) in 2024

Total annual compensation of the highest-paid individual in the Group in PLN (a)	5,117,605
Median total annual compensation of employees (excluding the highest-paid individual) in PLN (b)	134,467
Ratio of total annual compensation (a/b)	38.1

Principles used to calculate the level of the above metric

The remuneration of the highest paid individual — the sum of all components (base salary, bonuses, long-term incentive scheme remuneration, benefits, other monetary and non-monetary additional benefits — e.g. private medical care, cars, living expenses, and others) paid in a given year to the highest paid individual in the organization (who is not necessarily an employee).  
The median remuneration of employees — the median of the total annual remuneration of all employees.

When calculating the median annual salary of employees, the following rules were applied collectively:

- full gross remuneration was analyzed (basic salary, bonuses, benefits (e.g. private medical care), cars);
- only remuneration; paid to employees in a given year were aggregated;
- only the remuneration of people who were employees on 31 December of the reporting year were taken into account; and
- only remuneration paid on the basis of employment contracts to all people included in the S1-6 disclosure (i.e. all those counted as employees, regardless of the amount of working time) were included.

The statistics include the remuneration of people who combine employment based on employment contracts with employment based on civil law contracts, but for the part of the remuneration paid resulting from the employment contract. The statistics do not include the remuneration of employees who were absent for a long period of time on 31 December of the reporting year (maternity leave, parental leave, extended parental leave, sick leave of more than 30 days, pregnancy-related sick leave). The employee remuneration statistics do not include the remuneration of individuals who are members of the Management Boards or Supervisory Boards.



Adequate salary

S1-10

All of the employees of the Group receive appropriate remuneration in accordance with the benchmark indicator applicable in Poland, which is the minimum wage. This indicator is determined annually by a Regulation of the Council of Ministers and constitutes binding law in Poland.



Principles used to calculate the level of the above metric

In determining this metric, all individuals who are employees on 31 December of the reporting year (according to the S1-6 disclosure) and the amount of the minimum wage for the period in question, which is determined annually by the Decree of the Council of Ministers, were taken into account.

The statistics do not include the remuneration of employees who were absent for a long period of time on 31 December of the reporting year (maternity leave, parental leave, extended parental leave, sick leave of more than 30 days, pregnancy-related sick leave).

Incidents, complaints and serious impacts on human rights

S1-17

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 2024, five incidents or complaints related to work were reported within the Group. One of them was deemed justified, leading to the implementation of appropriate training and structural changes. Another report was considered partially justified, resulting in relevant training being conducted. The next report was found to be entirely unfounded; however, during ethical training, special attention was given to a thorough explanation of the issue it concerned. The last two reports were not confirmed. All issues were addressed in accordance with the procedure adopted within the Group. No such issue was identified that concerned a case of discrimination, including harassment, or had a significant impact on the observance of human rights among the Group's own employees. The Group was not subject to any significant fines or sanctions, and it was not required to pay compensation for such incidents. No complaints have been recorded as submitted to the National Contact Point for the OECD Guidelines for Multinational Enterprises.

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 related 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).





## Workers in the value-chain

**S2****SBM-2 related to S2**

The manner of considering the interests, views, and rights (including respect for human rights) of individuals performing work within the Group's value chain in its strategy and business model has been detailed in the ESRS 2 SBM-2 disclosure.

**SBM-3 related to S2**

According to the Management Boards' analysis, the actual and potential significant impacts of the Group on employees working within its value chain, as defined in the ESRS 2 IRO-1 disclosure, relate to ensuring safety on the Group's construction sites (at a higher level of the value chain). These impacts do not arise from the Group's strategy and business model but are linked to them through their influence on the value chain and decision-making process. The strategy and business model anticipate the execution of development projects by specialized construction companies, and construction activities are inherently associated with a high risk of accidents, the consequences of which can be severe or irreversible.

According to the double materiality assessment, this disclosure considers the employees of contracting companies who perform their work on construction sites managed by the Group. A similar approach to ensuring occupational health and safety (OHS) on construction sites applies to a certain number of the Group's own employees (covered by disclosures under ESRS S1), who perform their duties on construction sites and are exposed to similar risks.

These include construction supervision staff (e.g., site directors, construction coordinators, EHS specialists, and others).

One identified positive impact of the Group on employees of contractors on construction sites is the provision of an efficiently functioning OHS management system. The Group's influence on construction site workers is twofold in this regard: ensuring safe working conditions and providing OHS training and education, which can be utilized by workers on other construction sites and projects (not necessarily controlled by the Group). Such impacts occur on all of the Group's construction sites. The material impacts are located in Poland, where the Group carries out its development projects. The identified negative impacts are systemic and result from the nature of construction activities and the associated risks.

Detailed information regarding the assessment of the materiality of individual topics and subtopics, their impact on the strategy, business model, value chain, and operations, as well as their effects on people and the environment, financial consequences, time perspectives, and the Group's response, is provided in the ESRS2 SBM-3 disclosure in the chapter on general disclosures.

The Group has assessed that within the scope of its significant impacts in the supply chain, the risk of child labor, forced labor or compulsory labor, is low.



Employees in the Group's value chain, particularly those working on construction sites (higher levels of the value chain), are essential for implementing the Group's business strategy within the planned business model. In this context, the Group influences, or may influence, their interests, views, and rights, including human rights. To manage these issues, the Group exercises strict oversight of health and safety (OHS) matters on construction sites. This includes monitoring compliance with OHS laws, implementing standards developed and enforced by the Group, and conducting ongoing inspections of relevant work practices.

The manner in which the Group analyzed risks for different types of individuals performing work on its behalf (employees with specific characteristics, working in specific contexts, or undertaking specific activities) is described in the double materiality assessment disclosure, IRO-1, in chapter 1 on general disclosures.



## Policies related to employees in the Group's value chain

S2-1

According to the approach developed during the process of conducting the double materiality assessment process, the category of workers in the Echo Investment Group's value chain on which it has a significant and direct impact on includes those working on construction sites managed by the Group. Their employers are companies specializing in construction and in carrying out specific tasks for development projects. The Group's stakeholders have identified these workers as particularly vulnerable to risks to health and safety, considering the specific nature of the construction industry and its inherent hazards.

The Group is in the process of adapting its policies to meet ESRS requirements, and therefore, not all MDR-P points have been addressed.

### Human rights related to construction contractors

The issue of human rights concerning employees of contracting companies up to and including 2024 was regulated by the Code of Conduct, which was a mandatory aspect of significant construction contracts. Significant contracts include all agreements prepared by the contracting departments at Echo Investment and Archicom. The remaining contracts (orders) related to construction involve low-value, routine purchases made directly by employees on-site. By default, individuals authorized to enter into such agreements have limited power of attorney (a maximum of PLN 100,000 per contract or in total per contractor per year in Echo Investment, and PLN 500,000 in Archicom).

The Code of Conduct includes provisions regarding the obligation to comply with legal regulations and international standards on human rights, labor rights, the prohibition of forced labor and child labor in the value chain, the assurance of decent working conditions, appropriate remuneration and working hours, the guarantee of freedom of association and collective bargaining, and the prevention of bullying, discrimination, and harassment. The Code is described in detail in disclosure G1-1.

### Code of Conduct for Contractors and Suppliers

At the end of 2024, the Group introduced a separate Code of Conduct for Contractors and Suppliers, which will be gradually incorporated into contracts with contractors starting in 2025. This Code comprehensively regulates issues related to the treatment of workers within the Group's supply chain and includes the following provisions regarding the rights of employees of contractors:

- At the end of 2024, the Group introduced a separate Code of Conduct for Contractors and Suppliers, which will be gradually incorporated into contracts with contractors starting in 2025. This Code comprehensively regulates issues related to the treatment of workers within the Group's supply chain and includes the following provisions regarding the rights of employees of contractors:
- the commitment to respect human rights as defined in the International Bill of Human Rights;
- the prohibition of child labor;

- the prohibition of slave labor, forced labor, debt bondage, or any other form of coerced labor;
- the prohibition of psychological or physical coercion, slavery, and human trafficking;
- the ccommitment to provide employees with clear and understandable employment documents;
- the ccommitment to ensure employees receive appropriate compensation in accordance with minimum wage regulations and social security provisions;
- the ccommitment to provide employees with work hours in compliance with appropriate labor standards;
- the ccommitment to respect the right to freedom of association, the formation of trade unions, collective bargaining, and the right to express opinions on company plans and policies;
- the ccommitment to provide safe working conditions, personal protective equipment, adequately equipped workstations, and both on-the-job and periodic training;
- the ccommitment to allow employees to report unsafe situations and inform them of such possibilities;
- the ccommitment to counteract all forms of discrimination;
- the prohibition of bullying, harassment, or any other violations of dignity and integrity;
- the ccommitment to ensure equal access to development, promotion, and remuneration based on competence and the quality of work performed.



The Group's policy towards workers in the value chain is also supplemented by the provisions of the following documents:

- the EHS Policy;
- the 2030 sustainable strategy of Echo-Archicom Group;
- the Environmental and OHS Management System Book;
- the ISO 14001 and ISO 45001 standards

#### Verification of declarations and cases of non-compliance with workers' rights in the value chain

The Group has not implemented a systematic mechanism for verifying statements of contractors and subcontractors regarding compliance with the Code of Conduct and Code of Conduct for Contractors and Suppliers. If a case of a breach of human rights is uncovered, the Group has the right to demand that the situation be corrected and to utilize common tools by reporting such case to the State Labor Inspectorate, the Construction Supervision Inspectorate or to law enforcement agencies, etc. The Group may also exclude any entity involved in suspected breaches of human rights from future tenders.

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 and Rights at Work, or the OECD Guidelines for Multinational Enterprises. It should be noted, however, that the Group does not monitor these issues with respect to employees in the value chain but

only responds to credible information about such violations when obtained.

In 2024, the Group did not record any cases of human rights or labor rights violations among employees of contractors on construction sites. Additionally, the Group did not exclude any entity from its contracting system as a result of such irregularities being disclosed.

In the fourth quarter of 2024, the Group provided external entities, including employees in its value chain, with a channel for reporting irregularities (a form available on the websites of Echo Investment and Archicom), which is described in more detail in the G1-1 disclosure. Due to the short time since this decision was implemented, no reliable information has yet been collected regarding the functionality of the channel, reported irregularities, the channel's effectiveness, or the trust placed in it.

Responsibility for managing issues related to contractor agreements: Director of the Legal Department and Director of the Procurement Department

#### Management of the safety of employees on construction sites

Managing the safety of employees 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's side - Łukasz Bartnicki - was awarded a prestigious NEBOSH certificate in 2021, which confirms his competence in implementing work safety work standards at the highest international level. The work of these teams is directly supervised by the CEOs of both companies, which emphasizes the priority the Group places on managing these matters in the Group. The costs related to OHS on construction sites (personnel costs, security costs, personal protective equipment costs, training, etc.) amounted to approximately PLN 2.7 million in 2024.

#### ISO 14001 and ISO 45001 Certificates

Construction sites managed by the Echo Investment Group implemented the necessary safety standards, which are confirmed by international certificates.

The Group holds ISO 14001 and ISO 45001 certifications, which confirm the Group's high management standards in the areas of safety and environmental protection. Both systems apply to all of the Group's Group employees as well as contractors performing any work on the construction sites of Archicom and Echo Investment construction sites.

In 2024, an independent external audit by the firm Dekra Certification confirmed the compliance of the Group's EHS (Environment, Health and Safety) management systems with ISO 14001 and ISO 45001 standards, including Archicom for the first time. Such an audit is conducted annually.





The Management Board, directors, and construction site workers have OHS -related tasks incorporated into their annual objectives.

Responsibility for OHS policy management on construction sites: Head of the EHS Department in Archicom and EHS manager in Echo Investment

S2-2

### Collaboration with the workforce of the value chain in terms of impacts

The method of collaboration regarding impacts with individuals performing work within the value chain has been described in the SBM-2 disclosure.

The goal of the policy towards workers on construction sites workers is to limit risks to their health and life, in particular, the prevention of fatal accidents and the minimization of other workplace accidents, as well as avoiding the associated costs (permanent damage to health, emotional costs for employees and their families, lost work hours, downtime, and compensation payments). To ensure the safety of workers on construction sites, the Group - through its representatives - works closely with subcontractors. This includes cooperation in setting general rules and requirements, maintaining standards, checking authorizations, etc., as well as day-to-day ongoing cooperation on construction sites (issues of implementation of standards, deficiencies, the need

for protective equipment or safe execution of work). Construction site directors are responsible for cooperation with contractors' employees.

### Collaboration with construction site workers is carried out through the following actions:

- establishing rules governing work on the Group's construction sites with representatives of contractors (primarily site supervisors) (at the beginning of the cooperation - handover of the construction site);
- consulting the scope and schedule of training for workers with contractor representatives of contractors (annually or on an ongoing basis);
- receiving and addressing complaints and suggestions from construction workers, primarily via a publicly accessible board where any construction worker can post their proposal or complaint ("You Reported - We Acted" board) (on an ongoing basis);
- maintaining a system for reporting observations and potentially hazardous situations, which encourages everyone on construction sites (especially construction workers) to contribute to maintaining high safety standards and proper work execution. Reports are collected and documented daily and are used to implement improvements, particularly in the areas of safety and best practices;
- introducing a pilot satisfaction survey for construction workers in 2024 (the Group received too few responses to consider the survey representative).



The Group requires that there be at least one supervisor for every ten construction workers. Every person working on our construction sites — including subcontractor employees — is required to report all accidents, incidents, and near misses. Such information is forwarded to the OHS departments of the Group and subsequently used for prevention and education purposes on all of the Group’s other construction sites.

Accidents at Group’s construction sites in 2024

Fatal accidents due to work-related injuries	0
Other work-related injuries	9
Total number of workplace accidents	9

All of the employees working on the Group's construction sites fall under the rules described above.

The Group is not a party to global framework agreements or agreements with global trade union federations concerning the respect for human rights of individuals working in its value chain, including the right to collective bargaining.

BEST PRACTICES

We understand  
each other



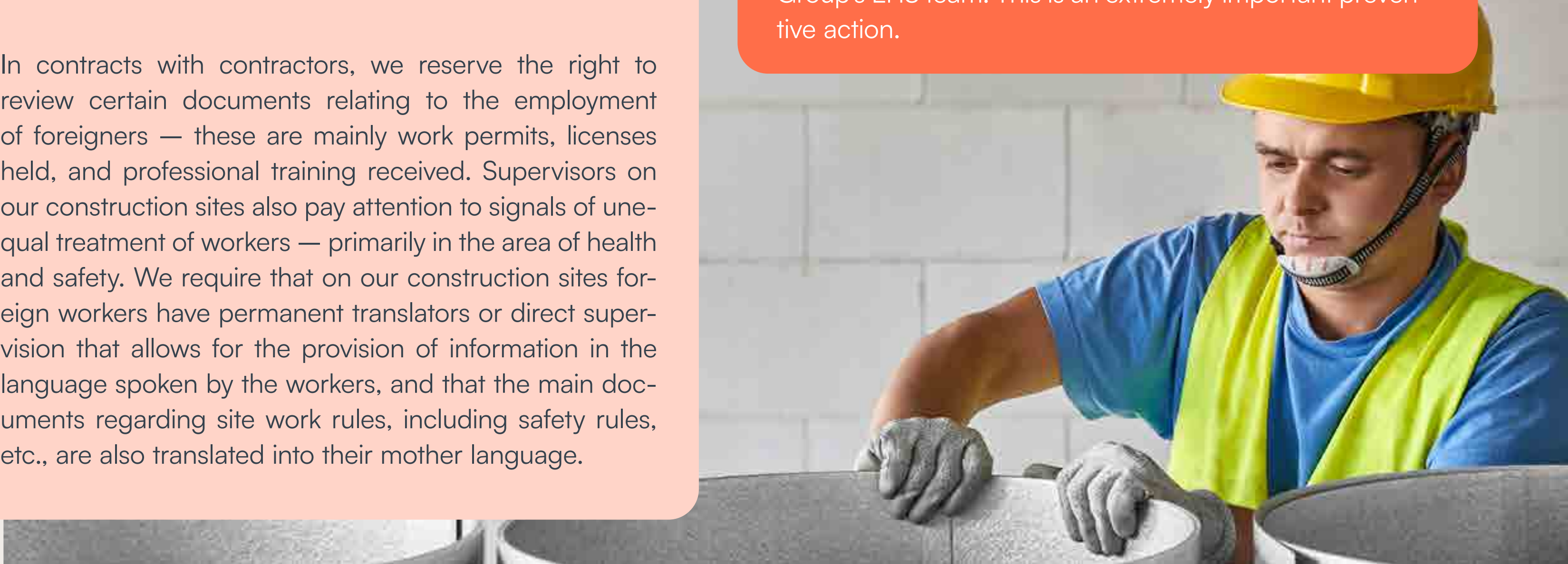
Among individuals working within the value chain, foreign workers, typically from the East (mainly Belarus and Ukraine) may be particularly vulnerable to negative impacts or marginalization. Our contractors and subcontractors value their reliability and work culture, so, together with them, we make every effort to ensure that these individuals 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 contracts with contractors, we reserve the right to review certain documents relating to the employment of foreigners — these are mainly work permits, licenses held, and professional training received. Supervisors on 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 that allows for the provision of information in the language spoken by the workers, and that the main documents regarding site work rules, including safety rules, etc., are also translated into their mother language.

9,098



— the number of observations related to occupational safety or environmental protection issues that were recorded at all of the construction sites of Echo Investment and Archicom in 2024. Each of the situations observed could conceivably contribute to an accident, which is why each observation was subsequently followed up with specific actions: rectifying the relevant deficiency, conducting a systemic analysis, and/or further monitoring by the Group’s EHS team. This is an extremely important preventive action.





Processes for addressing the consequences of negative impacts and reporting channels for individuals working within the value chain

S2-3

The policy regarding employees of construction companies on the Group's sites primarily aims to enhance the physical safety of workers by improving the environmental, health and safety protection (EHS) system.

Reporting irregularities at work related to EHS

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 sub-contractors. Chapter 13 of the Environmental and Health and Safety Management System Book regulates the handling of safety and environmental non-compliance issues (relating to deviations from the Environmental and Health and Safety Management System rules and the Group's Health and Safety Requirements). In accordance with such requirements, the Group investigates all relevant causes and any possible legal consequences of reported irregularities.

Each instance of non-compliance is analyzed by the person responsible for EHS on a given site (usually an employee of the Group), who then decides on corrective and preventive actions, delegates tasks related to the implementation of such actions and notifies the Head of EHS at Echo Investment or Archicom about such situations.

Strategic goal



Responding to numerous requests from workers on construction sites, in 2023 we introduced to the standard of contracts with contractors the requirement to provide adequate construction site facilities and guidelines governing requirements in connection with construction sites. On new construction sites, welfare facilities must be functional for workers, provide quality bathrooms and toilets, as well as provide a comfortable place to rest and eat. These requirements are much higher than the law stipulates, as we are concerned with ensuring proper working conditions in the Group's value chain.

The effectiveness and impact of corrective and preventive actions are monitored by the Heads of EHS (Environment, Health and Safety) departments of the respective companies. If necessary, the Group implements changes to its general procedures for all construction sites based on analyzed situations and subsequently informs all of the relevant employees of the Group (particularly construction site supervisors and members of the Management Boards) as well as employees of contractors (either supervisors or all workers, depending on the implications of the relevant changes). Each non-compliance report is documented by the construction site staff in a subsequent report and forwarded to the Head of

EHS. Significant non-compliance cases are reported by the Head of EHS to the Management Board (via an ad hoc report or a periodic summary report).

The Group actively encourages the reporting of irregularities during inspections and surveys of construction sites, at briefings, meetings, through a "You report — we act" board, numerous informational materials, as well as through a reward system for construction workers for their proactive attitude related to, among other things, safety and environmental protection. In 2024, construction sites managed by the Group distributed 293 such awards.

Another preventive and incentive-based measure is a system of yellow and red cards for those who fail to comply with health and safety rules on construction sites. An employee receiving a red card for a serious breach, or ignoring previous comments, will result in consequences being taken, including the possibility of removal from the construction site. Each worker has the right to refuse to perform tasks that he or she believes may result in an accident, injury, or impair health. In 2024, construction supervisors handed out 1,115 yellow cards, and 184 red cards.

Reporting of human rights and labor rights violations by employees within the value chain

Since the end of 2024, the Group has provided employees of contractors with a channel for reporting irregularities related to other issues, such as human rights, labor rights, ethical concerns,



and more. These can be reported via a form available on the websites of Echo Investment and Archicom.

The Group does not promote the existence of this channel among employees of contractors on construction sites, nor does it actively encourage its use or monitor levels of trust in it.

This system is separate from the above-mentioned reporting mechanism for environment, health, and safety protection issues.

The process for reporting and handling irregularities related to human rights and labor rights, as well as the protection of whistleblowers, is detailed in disclosure G1-1.

As the Group introduced this reporting channel in Q4 2024, at the time of preparing this statement, it does not yet have reliable data on reported irregularities, the effectiveness of this mechanism, or levels of trust in it.

S2-4

**Taking action on material impacts in connection with the workforce in the value chain**

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

- the Group's representatives supervising and providing oversight regarding working conditions in terms of OHS — through its own health and safety services;
- cooperating with contractors who meet the criteria related to health and safety;
- coordinating with contractors on site work;
- encouraging construction workers to share their concerns, observations, and ideas for improvements;
- providing training and education for employees of contractors.

The Group is working on aligning its actions to meet the disclosure requirements set by ESRS MDR-A.

Construction supervisors, both on the investor's side and on the contractor's side, are provided with training courses to meet ongoing safety needs. Training sessions are organized by representatives of EHS (Environment, Health and Safety) Team in cooperation with project EHS specialists, and funded by the Group. The scope of such training sessions is agreed upon with the contractors' site supervisors and is intended to complement the training programs provided to employees by the contractors.

To effectively manage the Group's significant impacts related to employees within the value chain, both companies operate central EHS (Environment, Health and Safety) teams. These teams are responsible for establishing, monitoring, and enforcing standards for safety during the provision of construction work and

environmental protection, establishing training priorities for construction workers, and analyzing accidents, incidents, and related observations reported on construction sites. Both central teams consist of five members (two from Echo Investment and three from Archicom). These central teams work closely with individuals (or teams) responsible for EHS on each construction site. Depending on the scale, complexity, and initial risk assessment of the project, local EHS teams may include Group employees or associates, representatives of larger contractor firms, or a combination of Group employees and contractors.

**Safety training for workers on construction sites**

An element of ensuring safety on construction sites is OHS training conducted by the Group for employees in the value chain. In 2024, the Group conducted an annual OHS&E briefing for its own construction supervision employees, training for construction supervision on the contractor's side, as well as specialized training on working at heights, vertical transport, and fire-hazardous work for contractor specialists.

The Group continuously undertakes actions to manage significant impacts, risks, and opportunities related to construction site workers and their safety. These actions involve enforcing the existing safety system, improving it, and providing employee education and supervision.



### Process of investigating work-related accidents

The Group's accident prevention system on construction sites is, to a large extent, based on recording and continuously analyzing all incidents, drawing conclusions from them, and promptly implementing improvements.

In 2024, the Group was carrying out 41 construction projects at various stages of progress. The EHS teams took care to ensure the flow of knowledge and good practices between EHS coordinators on each construction site. When an incident or accident occurs on any construction site, following an investigation into the causes of the incident, a report is prepared with conclusions and recommendations for all of the Group's construction sites. The task of the managers of each construction site is then to check the issue, implement the solutions, and inform the relevant EHS team of the actions taken.

Accidents and near-miss incidents are always documented, and their descriptions are shared with all relevant parties as well as all other construction sites within the Group. Each time such a report is made, it triggers an obligation to analyze the risk of a similar incident occurring on any other construction site and to take measures to reduce such risks. After receiving such information, the employees on each construction site have seven days to report to the relevant EHS team what measures have been taken in regard to reducing related risks. The analysis of past accidents and incidents is the basis for determining the topics of the training program for the following year, and, sometimes, the organization

of ad hoc training. The training programs are prepared by the Heads of EHS of each company by consulting with the contractors' site supervisors, and such programs are ultimately approved by the CEOs of both companies.

### We all care about the safety

The Group's construction sites are regularly inspected by various stakeholders, who give us insight into their opinions regarding the measures we take in connection with health and safety matters. Last year, the following inspections took place on the Group's 41 active construction sites:

- **900 Peer Review Visits**, which focused on health and safety matters. These visits were attended by the site managers and the supervision of contractor companies;
- **383 Executive Site Safety Visits (ESSV)**, conducted by representatives of the Management Board and senior management staff;
- **663 visits of the management** of the Project Management Department and representatives of the HSE Department;
- **325 introductory meetings** with contractors to discuss health and safety requirements, among other things;
- **9 inspections by the State Labor Inspectorate**, none of which found any significant irregularities.

The Group evaluates the effectiveness of its actions to ensure the safety of workers on construction sites based on the accident

### BEST PRACTICES

## Safety Week

Employee safety on construction sites is a top priority for the Echo Investment-Archicom Group, which is why we eagerly participate in every initiative that promotes it. The most important industry event in this area is the annual educational event Safety Week, which is organized by the Alliance for Safety in Construction. In 2024, the event was held with the theme "Everything in Order. #Sorted" and focused on organization and order on construction sites and workstations, in maintaining proper documentation, and in conducting business relationships with colleagues.

As part of Safety Week, the Group organized several training sessions, demonstrations, and activities related to workplace safety and comfort on construction sites. The following topics were covered:

- the practical use of portable fire-fighting equipment and fire extinguishers
- evacuation procedures and pre-medical first aid;
- construction safety practices applicable to various suppliers;
- vertical transport;
- the work of signalers and slingers.

Safety Week also engaged the families of employees of contractors through the children's art competition "My Parent Works Safely."



frequency rate 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 on construction sites through the expertise of experienced employees from its OHS teams, cooperation with contractor supervisors, and based on the type of accident or near-accident event observed.

Processes for managing material risks associated with individuals performing work in the value chain are part of the Group's approach to risk management.

Group’s targets related to workers in the value chain (on construction site) resulting from the sustainability strategy

Objective	Time to achieve	Implementation
No fatal accidents	Annual fixed	In 2024, no fatalities occurred on the Company's construction sites.
Introduction of a uniform standard of welfare facilities at all Company construction sites	to 2026	In 2023, the standard was introduced in the model contracts with subcontractors, in 2024 all new construction sites had the expected standard of welfare facilities.
Introduction of a system to measure employee satisfaction on construction sites	2023	Introduced in 2024, but with low responsiveness for now.

In 2024, no major issues, incidents, or violations related to human rights or labor rights were reported within the Group’s value chain at either the higher or the lower levels. However, it should be noted that the Group does not actively monitor these matters concerning employees in its value chain, but rather responds to information about such issues, incidents, or violations as it becomes available.

Our construction sites are regularly recognized by the State Labor Inspectorate. In 2024, the District Labor Inspectorates honored two construction sites operated by Echo Investment in the "Build Safely" competition. The Resi4Rent rental apartment buildings were completed in an exemplary manner: Gdańsk Stocznia R4R — 1st prize and Kraków Romanowicza R4R — 2nd prize.

S2-5

Targets related to managing negative material negative impacts, advancing positive impacts, and managing material risks and opportunities related to workers in the value-chain

These strategic and operational goals are directly related to the identified significant impacts, risks, and opportunities concerning construction site workers at a higher level of the value chain. They focus on ensuring safety and work comfort and contribute to the implemented occupational health and safety (OHS) system on construction sites.

The Group regularly monitors the effectiveness of undertaken actions and progress in achieving the set goals through regular monthly, quarterly, and annual reports from the EHS Department, independent reviews and site visits by Management Board members and senior executives, as well as working meetings.

The presented goals concern workers performing their duties on construction sites, primarily employees of contractor companies and, to some extent, the Group’s own employees who carry out part of their work on construction sites.

The Group has not cooperated with construction site workers or their representatives in defining these goals. However, the Group’s representatives consult with contractor representatives who employ workers on sites controlled by the Group regarding



Operational targets of the Group for 2024 related to value-chain employees (construction workers)

Target	Scope of application	Implementation
Lowest possible number of serious accidents and incidents resulting in lost working days - fixed annual target	Archicom and Echo Investment	In 2024, accidents occurred, resulting in a loss of 99 workdays
HSE training of all new Group employees working on construction sites	Archicom and Echo Investment	100% Completed
Obtaining certifications for ISO 14001 and ISO 45001 systems for the next year	Echo Investment	Completed
Resolution of reported non-conformities identified during occupational health and safety audits related to ISO certification	Echo Investment	No non-conformities identified
Adaptation of environmental and OHS management system to the requirements of ISO 14001 and 45001 and obtaining the relevant certificates	Archicom	Completed
HSE annual briefing for implementation teams (joint workshops and sharing of experiences, discussion of problems and ideas for improving the HSE system)	Archicom and Echo Investment	Completed
Conduct Supervisor Orientation Training (SOT) for site supervisors (both on the Group and contractor side) on every construction site that is started	Archicom and Echo Investment	Executed for all construction started in 2024
Implement and conduct status meetings with HSE coordinators - quarterly briefings on current issues on site	Archicom and Echo Investment	Executed on all sites
Ensure an adequate number of ESSV (Executive Site Safety Visits) and partner site reviews	Archicom and Echo Investment	Completed
Implementation and maintenance of systemic edge protection (steel) for work at height when concreting reinforced concrete columns and walls (edging and installation of a steel working platform or provision of a high health and safety standard of other access equipment, e.g. scaffolding)	Archicom and Echo Investment	Archicom — 97% completion, Echo Investment — 88% completion



ongoing activities, particularly in the areas of training programs and the introduction of additional OHS solutions.

The Group is working on aligning its goals to meet the disclosure requirements set by ESRS MDR-T.

The operational goals of the Group above derived from the Environmental and Health and Safety Management System Book for Echo Investment. In 2024 Archicom, they were modeled on the Book because this company already in 2024 has implemented ISO 14001 and ISO 45001. The goals reflect the current priorities of the Group.

Goals related to significant impacts on construction workers (primarily regarding occupational health, safety) are determined by the CEOs of both companies, who directly oversee the EHS teams. These goals are based on an analysis of statistics concerning accidents, incidents, and near misses recorded on all of the construction sites of each company.

When determining these goals, the Group did not directly collaborate with individuals performing work within its value chain, their legitimate representatives, or credible representatives. Instead, the EHS teams coordinated the implementation of goals with supervisory teams of contractors at individual construction sites. The EHS teams regularly discuss EHS performance with them (including goal progress) and continuously adjust actions in response to

presented results and observed needs, such as modifying training plans, introducing additional protective measures, and/or increasing the number of workers.

The Group's construction site safety system is based on an ongoing analysis of incidents, accidents, and key indicators (e.g., accident types, causes, nature of injuries, and accident rate per 1 million work hours). The Group continuously draws conclusions and implements improvements based on accident analyses for specific construction sites, contractor employees, and work phases, depending on the identified issue. This may include implementing additional or alternative protective measures, extra training, or replacing ineffective solutions.

Apart from the ultimate goal of preventing fatal accidents, the Group does not set any quantitative targets for reducing the number of specific accident types or overall accident numbers. Such an approach could discourage construction site supervisors from reporting incidents, especially minor ones, which would distort the overall picture and hinder the implementation of effective preventive measures.

#### BEST PRACTICES

### We learn from each other and hold each other accountable

The most crucial aspect of the development business is construction. We believe that every Group employee involved in a project must have a thorough understanding of environment, health and safety protection (EHS) regulations on construction sites, actively promote them, and continuously enhance their competencies in this area. Therefore, we require Group employees to regularly visit construction sites, observe how safety rules are implemented in practice, learn from these observations, and identify areas that need improvement. As a result, representatives of the Management Boards of Echo Investment and Archicom, senior management, EHS department employees, division directors, project managers, senior project managers, and construction directors are required to complete a specified number of EHS-related construction site visits. ESSV reviews involving Group management, as well as partner reviews, are an integrated part of the annual objectives of specific individuals, and their completion is considered when determining annual bonuses.





# Affected communities

S3



ESRS 2 SBM-2 related to S3

The approach to incorporating the interests, views, and rights (including respect for human rights) of communities affected by the Group's activities into its strategy and business model is detailed in the ESRS 2 SBM-2 disclosure.

ESRS 2 SBM-3 related to S3

According to the Management Boards' analysis, the actual and potential impacts of the Group on affected communities, as outlined in the ESRS 2 IRO-1 disclosure, stem from the Group's strategy and business model and are linked to interventions in city functionality through the purchase of land, changes in its use, construction processes, and the provision (or lack thereof) of access to such areas after construction is completed (in specific ways). This is explicitly expressed in one of the pillars of the business strategy (destinations). The double materiality assessment highlighted the significance of the Group's positive impact on local communities through urban development projects that enhance the functionality of the area as well as the comfort and safety of its use.

Affected communities primarily include neighbors of the projects under development, who are most exposed to the inconveniences of construction work but can also benefit from the transformation of these areas (e.g., through the ability to use them, improved safety and quality of the neighborhood, or increased property values for neighbors). The impact on affected communities arises from the Group's own operations (property acquisition, decisions on planned land use, and design) as well as the operations of contractors on construction sites, which belong to the higher tier of the value chain (construction execution).

The method by which the Group analyzed risks to affected communities (those with specific characteristics, living in particular

contexts, or engaged in specific activities) is described in the double materiality assessment disclosure — IRO-1, in the section on general disclosures.

S3-1

## Policies related to affected communities

The double materiality assessment 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.

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 Group's Management Board recognizes that the strategy and business model are 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 to use its offer, increase of surroundings value, increased value of properties around), while its negative effects (inconveniences during the construction process) are mitigated by the Group through ongoing project management.



The Group does not have an independent policy related to affected communities. The Group recognizes that the set of mechanisms and procedures it employs to manage impacts on affected communities is sufficient and fulfills its purpose. Moreover, the double materiality assessment did not reveal any significant negative impact of the Group on affected communities.

In the double materiality study process, the Group did not identify material negative impacts on affected communities, and it also does not identify material risks to itself related to impacts on communities. Although it does not have a separate policy for managing such impacts, to ensure that its processes of 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 side walks, 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.

Activities related to affected communities are defined in the Group by general regulations such as the Code of Conduct.

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). 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 it relies on laws and decisions of state institutions.

CODE OF CONDUCT:

"All Echo Group companies (and accordingly - Archicom companies) are responsible for developing and conducting economically justified and socially responsible business operations. Echo (Archicom) assumes this responsibility in the areas over which it has actual control. This primarily pertains to relations with employees, business partners, local communities, and the environment in which we operate."

"We listen to the expectations and needs of local communities and take them into account to the widest possible extent."

The Code does not refer to the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, or 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.

The Group is in the process of adapting its policies to meet ESRS requirements, and therefore not all MDR-P points have been addressed.

S3-2

Cooperation processes regarding interactions with affected communities

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 plans. We also cooperate with city institutions and non-governmental organizations. 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 special cases, when required by legal procedures, we organize public consultations regarding our investments. In 2024, this happened in the case of two Archicom's projects: the Kabaty at KEN avenue and Postępu 2 in Warsaw. Then, the dialogue was initiated at the design stage in accordance with the Instruction of the Mayor of the Capital City of Warsaw on the rules for conducting dialogue on investments or based on analogous guidelines in other cities. The architectural team, usually consisting of representatives of the Group and an external architectural studio, is then responsible for conducting the dialog. The team's actions are coordinated by the Group's director of strategic planning 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.

### 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. In 2022 we implemented an obligatory reporting on notifications related to construction sites. Project managers or construction directors report information about complaints related to the operation of their construction sites to the Health, Safety, and Environment Department (HSE). These were typically

## Dialogue on Kabaty and Postępu 2 projects in Warsaw

In 2024, Archicom conducted two dialogues regarding investments proposed under the so-called Special Housing Act. This procedure requires the publication of the assumptions of the planned investment and conducting a dialogue with stakeholders about it. Dialogues on investments under this procedure represent the most structured social consultations conducted with local communities.

The two processes conducted in 2024 concerned residential investments in Warsaw: at al. KEN in Kabaty on the plot of the former hypermarket, and at the intersection of Postępu and Bokserska streets, on a plot occupied by old office buildings.

### Actions included in the investment dialogues:

- preliminary project consultations with offices (particularly the Department of Architecture and Spatial Planning of Warsaw, other units of the City of Warsaw, the Ursynów District Office, and utility providers),

- presentation of the project and process on dedicated websites, allowing stakeholders to ask questions and receive answers,
- open presentation of the project and discussion,
- open remote information meeting.

As a result of these dialogues, Archicom analyzed all suggestions and decided to introduce several changes to the proposed projects. For the Kabaty investment, the most significant change involves the relocation of the planned school building. In the updated proposal, the school will be situated within the planned housing estate rather than adjacent to the existing school. For the Postępu project, the designers are focusing on addressing the primary concern raised by the community: transportation solutions.

Archicom is currently continuing project and administrative work on both projects, and once these are completed, the projects will be submitted for a vote by the City Council of Warsaw.







proactive complaints from neighbors concerning the nuisances caused by the construction work (noise, lack of order and cleanliness). The report should include information about the complainant, the reported issue, the method of resolution, and the response time. The Group did not promote channels for reporting such issues among local communities. Collecting this information from all construction sites aimed to enable the analysis of reported issues, the methods of addressing them, and improving work organization.

In 2024, six such complaints were registered at the Groups' construction sites.

In the fourth quarter of 2024, the Group provided external entities, including affected communities, with a channel for reporting irregularities (a form available on the Echo Investment and Archicom websites), which is described in more detail in the G1-I disclosure. Due to the short time since this decision was implemented, no reliable information has yet been collected regarding the functionality of the solution, reported irregularities, the mechanism's effectiveness, or the trust placed in it.

None of the Group's companies has designated a specific person or function responsible for ensuring that cooperation with affected communities takes place and that its outcomes influence the Group's approach to significant issues. Such cooperation occurs in specific contexts, which is why it is managed by individuals responsible for particular matters. For example, these may include individuals overseeing construction (in the context of responding to reports of street pollution or noise), those managing the administrative process of obtaining approval for investments under the so-called Special Housing Act (social dialogue), or marketing or communication managers (in matters related to participation in local social or charitable initiatives).

The Group has not identified any group among the affected communities that is particularly vulnerable or marginalized.





## 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 sustainable design, sharing economy, promotion of public transportation, pedestrian and bicycle connections. Their integral element is also greenery.

Share of multifunctional urban investments ("destinations") in the total portfolio under construction and preparation by the Group [sqm of usable area]

Portfolio size	1,262,400
„Destination” projects	737,300
Indicator	58%

The Group includes the following projects under the "destinations" investments: Wita Stwosza and Kapelanka in Kraków; Fuzja, Zenit, and Flow in Łódź; Wieża Jeżyce in Poznań; Modern Mokotów, Towarowa 22, Rytm, Postępu, and Kabaty in Warsaw; Planty Racławickie, Olimpia Park, Browary Wrocławskie, , Mikato in Katowice and the district comprising the Powstańców 7D, MidPoint 71, and Swobodna Spot projects in Wrocław.

S3-3

### Remediation processes for negative impacts and channels for affected communities to report problems

The Group's negative impact on neighbors and local communities, is due to the very nature of the property development business and the specifics of construction activities. This primarily concerns inconveniences related to the construction process: noise, street pollution, heavy equipment traffic, etc. The Group minimizes 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. However, according to the double materiality

assessment, the negative impact of construction projects on local communities is not considered a material topic. The topic of urban development, on which the Group has a positive impact, has been identified as material and in which no impacts requiring corrective actions have been identified.

The Group does not offer the local communities a special channel for reporting irregularities, violations or concerns, but reporting is possible by contacting (in person, by email, by phone) the construction site or sales office (in the case of Archicom's residential projects) or Group companies through publicly available channels on websites or through social media profiles.

The Group does not promote contact channels among affected communities and does not assess whether they are aware of the possibility to submit feedback or complaints, or whether they trust these channels. Furthermore, it has not implemented a policy to protect complainants from retaliatory actions.

In the event of a significant negative impact, where possible, the Group's employees managing construction sites strive to mitigate it by taking appropriate actions, such as commissioning additional cleaning work, reorganizing the construction site, or limiting the hours for performing disruptive tasks. During the reported period (as well as the comparative period), no significant issues related to the negative impact of the Group's construction projects on affected communities occurred that would have required a stronger response than those outlined above. The effectiveness



of corrective actions is assessed based on whether the reported issue has been resolved and whether it is reported again. Effectiveness is monitored at the level of each construction site but is not analyzed at the Group level.

The method of managing complaints and feedback on the Group's construction sites is described in disclosure S3-2 above. 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 2024, the Group registered six such reports.

The Group does not promote such a channel for submitting complaints and feedback among affected communities, nor does it analyze whether the affected communities are aware of such possibilities.

**S3-4**  
**Taking action on material impacts on affected communities**

Since the significant impact of the Group's activities on affected communities, as identified by the double materiality assessment, is positive (urban development), the Group does not undertake actions aimed at providing remedial measures. The Group has not made any commitments or set objectives toward affected communities.

The Group engages with the local community to inform them about its plans, manage the risk of project blockages by local communities or infringements on their significant interests, and gain support for its investment activities.

The Group is working on aligning its actions to meet the disclosure requirements set by ESRS MDR-A.

An integral part of the Group's collaboration with local communities, related to its projects, involves charitable and social initiatives. Their purpose is to build trust and a positive reputation for the Group within the community, as well as to compensate for inconveniences caused by the Group's activities (e.g., disruptive construction projects).

**The Group's charity and social actions in relation to local communities**



**Echo Investment:**

- support for the First Gate Theatre Foundation, particularly for the production of the next performance in the "Shakespeare in the Park" series,
- support for the Invest Handball Kielce Handball Association,
- support for the Ronald McDonald Foundation,
- sponsorship of the top Polish handball team Industria Kielce.

**Archicom:**

- support for the Wrocław-based "Życ Inaczej" Association, which organizes activities for children and seniors, through the donation of interior furnishings,
- donation of furniture to the Ekostraż Animal Protection Association,
- donation of interior furnishings to the "Zobacz Mnie" Foundation, which helps sick and disabled children,
- support for organizing the "Maltese Wafer" charitable event for the elderly, lonely, and marginalized,
- support for local communities during the floods in September 2024: delivery of food for emergency services and volunteers, provision of two excavators from Archicom construction sites to the city of Wrocław, supply of 30 dehumidifiers and sandbags for the regions most affected by the floods, financial support of 50,000 PLN in cooperation with the Polish Association of Real Estate Developers (PZFD).



In 2024, 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.

The resources that may be allocated to manage the significant impacts of the Group on affected communities include:

- the Group's business strategy, which is built around creating friendly and open "destination" projects that enhance the quality of public spaces and allow local communities to benefit from them,
- employees assigned to specific actions concerning affected communities, including:
  - a. architects and designers (internal and external) who define the direction of designed investments as well as their accessibility, usability, and openness to the local community,
  - b. construction managers — in cases of reports regarding construction nuisances,
  - c. marketing managers — for activities that can support local communities while also contributing to the marketing efforts of the Group or its projects,
  - d. the Ethics Committee, which analyzes and recommends specific actions related to donations or sponsorships for local communities,

- an annually approved budget for sponsorships and donations, as well as the possibility of utilizing marketing budgets of individual projects for marketing activities that simultaneously support local communities.

### EcoExperimentarium — fun with ecology at home



The Echo Investment Group — Archicom was a partner of the ecological exhibition EcoExperimentarium, which took place in December 2024 at the European Fairytale Center in Pacanów.

EcoExperimentarium is a free, traveling, interactive exhibition featuring installations with tasks for children to solve, aimed at school-aged children. It showcases simple, proven ways to engage in climate-positive actions that can be implemented daily at home: saving water, conserving energy, and sorting waste. The exhibition is complemented by online games and lectures for young audiences. This initiative is part of a broader project, EcoExperimentarium, created by the Mamy Projekt Foundation.

In 2025, the exhibition will also be presented in Warsaw and Wrocław





Goals for managing material negative impacts, improving positive impacts and managing material risks and opportunities

S3-5

In the area of urban development, which was identified as a material influence, the Group's goals have an indirect connection to affected communities and are not environmental goals. However, in the Group's view, the implementation of such goals mitigates the negative environmental impact of the Group's activities by reducing the consumption of resources such as land.

In terms of the direct impact on affected communities, the Group's goal was to implement a complaint management system for individuals near construction site, monitor such complaints, and establish objectives for subsequent years. This goal is not related to significant impacts, risks, and opportunities. The Group is working on aligning its goals to meet the disclosure requirements set by ESRS MDR-T.

The Group's goals pertain to its own operations, as well as operations conducted on construction sites (at a higher level of the value chain). The Group has not established its goals either directly or indirectly with affected communities and does not track outcomes with them regarding the achievement of these goals. From the analysis conducted so far on goal achievement, the Group has drawn no significant conclusions and has not implemented any improvements.

The Group regularly monitors the effectiveness of undertaken actions and progress in achieving set objectives through regular

reviews and reports for the Management Board, as well as working meetings of the Steering Committee with individuals responsible for the implementation of specific goals.

The Group's urban development goals, stemming from its sustainable development strategy



Goal description	Achievement of the goal
Building urban, multifunctional "destination" projects (multi-phase, with a public space component, access to urban amenities such as public transport, daily shopping, schools/kindergartens) to constitute at least 50 percent of the Group's projects under construction and preparation	Goal achieved, reached level of 58 percent.
Developing real estate projects exclusively within city boundaries	Goal achieved in 2024
Purchasing previously developed properties (brownfield) for future projects — 90 percent throughout the period 2023-2030	The goal is in progress, in accordance with the assumptions.
Development and implementation of guidelines for handling neighbors' complaints, setting measurable targets	According to the ESG Strategy Roadmap, the system was introduced in 2023 and monitored in 2024 to gather insights and suggestions for improvements. In 2025, the Group will focus on increasing the number of registered complaints.





## Clients and end-users

S4

SBM-2 related to S4

The approach to incorporating the rights (including human rights), interests, and views of consumers and end-users into the strategy and business model is detailed in the ESRS 2 SBM-2 disclosure.

SBM-3 related to S4

According to the Management Boards' analysis, the actual impact of the Group on customers and end users, as defined in the ESRS 2 IRO-1 disclosure, which arises from and is linked to the Group's strategy and business model, is the creation of inclusive spaces. This is a key element of the Group's business strategy, which focuses on developing multifunctional urban projects that incorporate significant public space components.

Additionally, the Group has identified significant impacts related to the creation of safe spaces (affecting users of completed developments, such as residents and visitors) and ensuring fair marketing practices (particularly concerning customers purchasing apartments). Both of these groups belong to the lower levels of the value chain. However, these issues do not impact the Group's strategy or business model.

The identified impacts arise directly from the Group's own operations.

The development projects undertaken by the Group meet all of the required legal and technical standards, often exceeding such requirements. The Group implements modern solutions for accessibility and safety in the spaces it constructs, which helps to facilitate the use of such spaces by individuals with special needs and enhances overall safety. These efforts include ensuring appropriate lighting, reducing architectural barriers, and incorporating suitable devices and equipment. It is also worth noting that the Group frequently develops projects in areas that were previously degraded and inaccessible to users, thereby integrating them into the urban landscape. In relation to S4 disclosures, the Group has identified one material negative impact — unfair sales practices. This impact is potential and incidental in nature.

The way that the Group analyzes risks to clients and end-users (with specific characteristics or that use certain products and services) is described in the double materiality assessment disclosure, IRO-1, located in the chapter on general disclosures.

Detailed information regarding the assessment of the materiality of individual topics and subtopics, their impact on the strategy, business model, value chain, and operations, as well as their effects on people and the environment, financial consequences, time perspectives, and the Group's response, is provided in the ESRS2 SBM-3 disclosure in the chapter on general disclosures.



S4-1

Policies related to consumers and end-users

Clients and end-users, that belong to the Group's significant stakeholders, are, in particular:

- users of the projects built by the Group (people working in offices and shopping centres built by the Group: customers of shops, service centres, restaurants in the Group's buildings, and/or visitors to public spaces around the Group's projects); and
- clients purchasing apartments from Archicom (in particular, individuals).

Regarding disclosures related to clients and end-users, the double materiality assessment identified the following material topics:

- the personal safety of clients or end-users (subtopics: "Creating safe spaces" and "Creating inclusive spaces"); and
- the social inclusion of clients or end-users (subtopic: "Avoidance of unfair sales practices").

The Group has not undertaken any commitments regarding human rights that it identifies as material to clients and end-users beyond those obligations directly arising from legal regulations.

The Group is in the process of adapting its policies to meet ESRS requirements, and therefore not all MDR-P points have been addressed.

Policies related to clients and end users

Good spaces

The Group has not developed a separate policy on creating safe and inclusive spaces. In managing these aspects, it follows applicable legal regulations, market trends, the needs of its clients and users, and additionally strives to introduce new solutions that set good practices for the industry.

Responsibility for the management of material issues: **The Director of the Architects Department (Echo Investment S.A.) and the Head of the Design Department (Archicom S.A.)**

Customer safety

The Group has not implemented a separate policy for preventing unfair sales practices. However, this issue is managed primarily through the application of applicable legal regulations and adherence to the adopted Code of Conduct, which explicitly includes the principle of fair communication and cooperation with clients. This issue mainly concerns the sale of residential properties by Archicom, where clients are private individuals for whom purchasing a home is a life decision of great financial significance.

Responsibility for the management of material issues: **The Member of the Management Board of Archicom S.A. responsible for Sales and Marketing**

Protection of personal data

Due to the nature of apartment sales, the protection of personal client data may be considered an important area of risk. The purchase of a flat involves sharing a significant amount of personal data with the Group. The Group manages data through a secure CRM system, which organises the flow of correspondence and information transfers with clients and restricts access to data to unauthorised parties. The Group does not process sensitive data as defined by the General Data Protection Regulation (GDPR).

Archicom does not have a separate policy on personal data protection, but a security policy is implemented by way of the following integrated sets of activities and procedures:

- mandatory training regarding the principles of personal data processing at Archicom, conducted during introductory training for employees (onboarding);
- regular 'Cyberhero' training with a test that takes place at least once a quarter and reminds all employees and collaborators of the basic rules for managing personal data and business-sensitive information, activity in social media, the Internet or principles related to cyber security. The training sessions are provided by and communicated to employees by the Infrastructure and Security Department; and
- compliance with privacy policy standards and their communication on all websites managed by the Group.



The Group has the Data Protection Officer that is responsible for maintaining the functions related to data protection. The management of and access to client and company data are governed by the written data security policy of Echo Investment. Due to the nature of our operations and access to a limited amount of personal data, this policy is not considered significant for our activities.

### Fair marketing

Pursuant to the Code of Conduct, the Group's Public Relations, Investor Relations and Marketing communications are based on honesty and communicating truthfully. 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 conducting business 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 binding prospectus applies to every apartment sold.

In 2024, the Group did not record any reports of non-compliance with the regulations regarding information provided in marketing materials, prospectuses, or provided during face-to-face meetings with account managers.

### Industry Code of Developers

As a member of the Polish Association of Developers (PZFD), Archicom is a signatory of the Code of Good Practices regarding customer relations. In accordance with the Code, the company fulfills its obligations at each of the following three stages of its relationship with the customer: before the investment begins, during its implementation, and after its completion.

The Code also includes a section outlining the obligations of customers at each stage of the process. It provides advice to customers regarding basic actions, such as verifying the developer and the legal status of the property where the investment is planned. It also offers customers the option to report any irregularities in their relations with developers, providing an additional mechanism for addressing misconduct by companies that do not adhere to the Code.

The content of the Code has been approved by the Office of Competition and Consumer Protection (UOKiK).

The Group has not identified any material risks related to the human rights of consumers and end-users in its own operations or its value chain. The Group's policies in this area are based on the universal human rights and other policies described in detail in the SI-1 disclosure of this chapter.

The Group has not undertaken any commitments regarding policies toward clients and end-users based on third-party standards or initiatives (e.g., those of international organizations). The Group's policy principles in this area have not been analyzed for compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises.





S4-2

Processes for engaging with consumers and end-users about impacts

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 regarding 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 not designated any person or function responsible for dialogue with clients. If such cooperation exists, responsibility is ad hoc, depending on the scope, purpose and circumstances of such cooperation.

The Group does not assess the effectiveness of its collaboration with consumers or end-users, nor does it enter into agreements or commit to actions in this regard.

Archicom's cooperation with clients

The Archicom team conducts client satisfaction surveys, which provide information regarding the quality of service, purchase preferences, and project expectations. The results of these surveys are analysed, and they are a starting point for the improvement of Archicom's processes, offers and services. During the sales process, the company has identified twelve key moments where it studies clients' satisfaction by emailing them electronic surveys. Such surveys are not just limited to measuring the Client Satisfaction Score (CSAT) and Net Promoter Score (NPS), but also include additional, stage-specific, questions and, therefore, provide detailed information about the experience of our clients.

S4-3

Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

According to the double materiality assessment, negative impacts on the Group's clients may include unfair marketing practices or data breaches. The Group assesses both risks as incidental.

Methods of reporting and remediation

→ Unfair marketing

Reporting method:

- Client advisors (Group employees),
- Third-party mechanisms: courts and the Office of Competition and Consumer Protection (UOKiK),

Remediation method:

- cessation of the violation,
- compensation,
- apology.

→ Personal data protection

Reporting method:

- Data Protection Officer (or a person fulfilling this role) within the Group,
- Third-party mechanisms: Personal Data Protection Office (UODO) and the courts,

Remediation method:

- apology,
- compensation,
- reimbursement of incurred costs (e.g., document replacement),
- reporting to the Personal Data Protection Office (UODO).



In promoting channels for reporting violations of customer and end-user rights, the Group relies on meeting all of the relevant legal requirements and does not implement additional measures to enhance accessibility to or awareness of these channels.

The Group does not monitor the effectiveness of reporting channels or awareness in regard to their existence. In the Group's opinion, due to the low risk, the infrequent occurrence of such violations, and the implemented regulations that comprehensively address key risks, monitoring the system's effectiveness and further promoting reporting channels would be unjustified.

### Violations of fair marketing principles

The Group does not have a dedicated policy for addressing violations of fair marketing principles. Its approach in this area focuses on ensuring compliance with legal regulations and ethical or customary standards. Remediation mechanisms for violations rely on commonly applied measures, such as the amicable resolution of potential disputes and handling cases through state institutions, primarily the courts.

### Procedure in the event of a data breach

The Group informs all potential stakeholders (individuals whose personal data may be collected) about channels for reporting personal data security breaches, options for data deletion, and ways to manage their data — via appropriate clauses on the website, in statements attached to documents, and by way of other means.

### Data breach management process

#### 1. Identification of the breach:

Detecting and identifying whether a personal data breach has occurred, including determining what data was breached and how.

#### 2. Risk assessment:

Analyzing the breach in terms of its potential impact on the individuals affected. This involves identifying potential damages resulting from the breach (e.g., identity theft, loss of privacy).

#### 3. Notification to affected individuals:

Informing the individuals whose data was breached, specifying what data was compromised and advising on actions they can take to protect themselves from potential consequences.

#### 4. Notification to the supervisory authority:

If the breach meets regulatory thresholds (e.g., large scale, high risk to the rights and freedoms of individuals), the Group will notify the supervisory authority (the Personal Data Protection Office).

#### 5. Corrective actions:

Implementing appropriate remedial and preventive measures to stop further breaches or to prevent the recurrence thereof. This may include strengthening IT security, revising internal procedures, or conducting training sessions for employees.

#### 6. Event documentation:

Recording all of the details related to the breach, including its circumstances, consequences, and actions taken to mitigate the impact thereof.

The Group has not implemented specific policies or procedures aimed at protecting consumers from retaliatory actions, as it considers such measures to be ineffective. The Group does not take actions to assess customers' awareness and trust in reporting structures or their confidence in these mechanisms.





## S4-4

**Taking actions regarding significant impacts on customers and end-users**

In 2024, the Group experienced five data breach incidents. One of them was serious and required notifying the Personal Data Protection Office. The case was closed by the office. In 2024, the Personal Data Protection Office did not impose any fines on the Group. All incidents concerned Archicom.

In each situation, the Group implemented the preventive and corrective actions provided for by the procedure.

In 2024, there were no confirmed breaches of the law in connection with the Group's sales and marketing practices. No serious issues or incidents related to human rights involving customers or end-users have been reported to the Group.

In order to monitor the effectiveness of its policies, the Group uses information regarding policy breaches, their sources, and the relevant actions taken. In the opinion of the Management Board, the policies regarding data protection and fair marketing are fulfilling their purpose.

In 2024, the Group did not undertake any significant actions aimed at preventing material negative impacts on consumers or end-users, mitigating such impacts, or providing remediation — other than the strict adherence to the policies and regulations established in previous years. In the Group's assessment, the currently operating system functions effectively and fulfills its purpose by preventing significant negative impacts and ensuring the provision of efficient and adequate remedial measures.

The Group is working on aligning its actions to meet the disclosure requirements set by ESRS MDR-A.

**Personal data breaches**

Information on the necessary and appropriate actions in response to a specific, actual or potential, negative impact on customers related to personal data breaches is determined on a case-by-case basis by the Group's Data Protection Officer (DPO) based on legal regulations and market guidelines for reporting such incidents. According to the Group's assessment, such risks do not exist for end-users.

The Group evaluates its personal data protection practices for customers as sufficient. These practices include a due diligence process, which involves regular system assessments as well as responding to current needs to improve its mechanisms.

The management of personal data protection is the responsibility of the Group's DPO, who possesses the relevant knowledge and experience. Preventive actions include training employees and collaborators on personal data protection and procedures to follow in the case of a breach. This training is particularly targeted at individuals with access to personal data, but basic information is also provided to all of the Group's employees as part of its ethics training, detailed in disclosure G1-3, in chapter 5.

The personal data security functions within the Group are overseen by the DPO, who ensures compliance with the relevant regulations. Since the highest risks related to personal data have been identified within Archicom (due to its large database of current, former, and potential customers), the company utilises a secure IT system for client communication. This system stores customer data and information regarding the history of relationships with each client, ensuring compliance with all legal requirements, easy identification of potential irregularities, and access for authorized personnel only.

**Unfair marketing practices**

Information regarding the necessary and appropriate actions in response to a specific, actual or potential, negative impact on customers or end-users related to unfair marketing practices at Archicom is determined on a case-by-case basis upon the disclosure of such impact by the Marketing Director or the Member of the Management Board responsible for marketing and sales. This issue is not considered significant at Echo Investment.

The actions taken depend on the nature and scope of the disclosed violation. They may be managed internally, but if the issue is systemic and concerns widespread market practices, Archicom strives to cooperate with the industry through forums like the Polish Association of Developers (PZFD) to develop appropriate practices and systemic tools or remedies.



The Archicom Group aims to address disclosed violations and unfair marketing practices as quickly as possible, as this is essential to its economic interests. The Group operates in a demanding and competitive market where transactions involve sensitive issues such as providing housing and often long-term financial commitments. In such conditions, maintaining a strong reputation and ensuring full compliance with legal, ethical, and best market practices is in the Group's interest.

The Group evaluates its fair marketing practices as sufficient. These practices include a due diligence process, which involves regular system assessments and responding to current needs to improve mechanisms.

The management of fair marketing practices at Archicom is overseen by a team of experienced marketing experts.

BEST PRACTICES

## Data security and protection — CyberHero training program

In times of increasing cyber threats, the Group is exposed to attacks targeting our IT infrastructure as well as social engineering attacks, which primarily affect employees.

In 2023 and 2024, the Group conducted CyberHero training programs for our employees focused on data security and protection. The programs covered topics such as phishing, internet security, smishing, the use of strong passwords, and social media security. Throughout the CyberHero programs, regular phishing attack simulations were conducted to assess employee vulnerability to this form of cyberattack. The participation rate in the six training programs conducted was 63 percent. The programs concluded in February of 2024.



S4-5

### Targets related to managing material negative impacts

For the implementation of its policies regarding impacts on clients and end-users, the Group's objective is to ensure the effective protection of its clients' personal data, fair marketing practices, and the compliance of its activities with the law. The Group has not adopted any additional objectives in this regard. It pertains to a lower level of the Group's value chain.

In setting objectives, monitoring results, and drawing conclusions from the implementation of the policy related to clients and end-users, the Group did not engage in collaboration with stakeholders.

The Group monitors the effectiveness of actions related to the goal through the analysis of reported irregularities in personal data handling and unfair marketing practices.

The Group is working on aligning its goals to meet the disclosure requirements set by ESRS MDR-T.



4

For Stakeholders



## Culture of ethical business conduct

Adherence to ethical principles, 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 in line with ethical principles, and we require such action from all of our employees and business partners.

### GOV-1 related to G-1

The role of the Group's management and supervisory bodies in relation to business conduct, as well as the expertise of the members of these bodies in relation to business conduct, is described in ESRS 2 GOV-1 disclosure.

### Our ambitions by 2030:



- Promoting an **ethical culture** among our employees by conducting regular information sessions, training and examinations
- Compliance with the **Best Practice of WSE Listed Companies** - with an annual analysis of possibilities to reduce the number of deviations from such Best Practice
- **Shaping sustainability awareness** in the Management Boards and Supervisory Boards of Echo Investment S.A. and Archicom S.A.
- **Increasing the representation of women** on the Management Boards and Supervisory Boards of Echo Investment and Archicom





G1-1

Business policies and corporate culture

Echo Investment’s vision and values

VISION

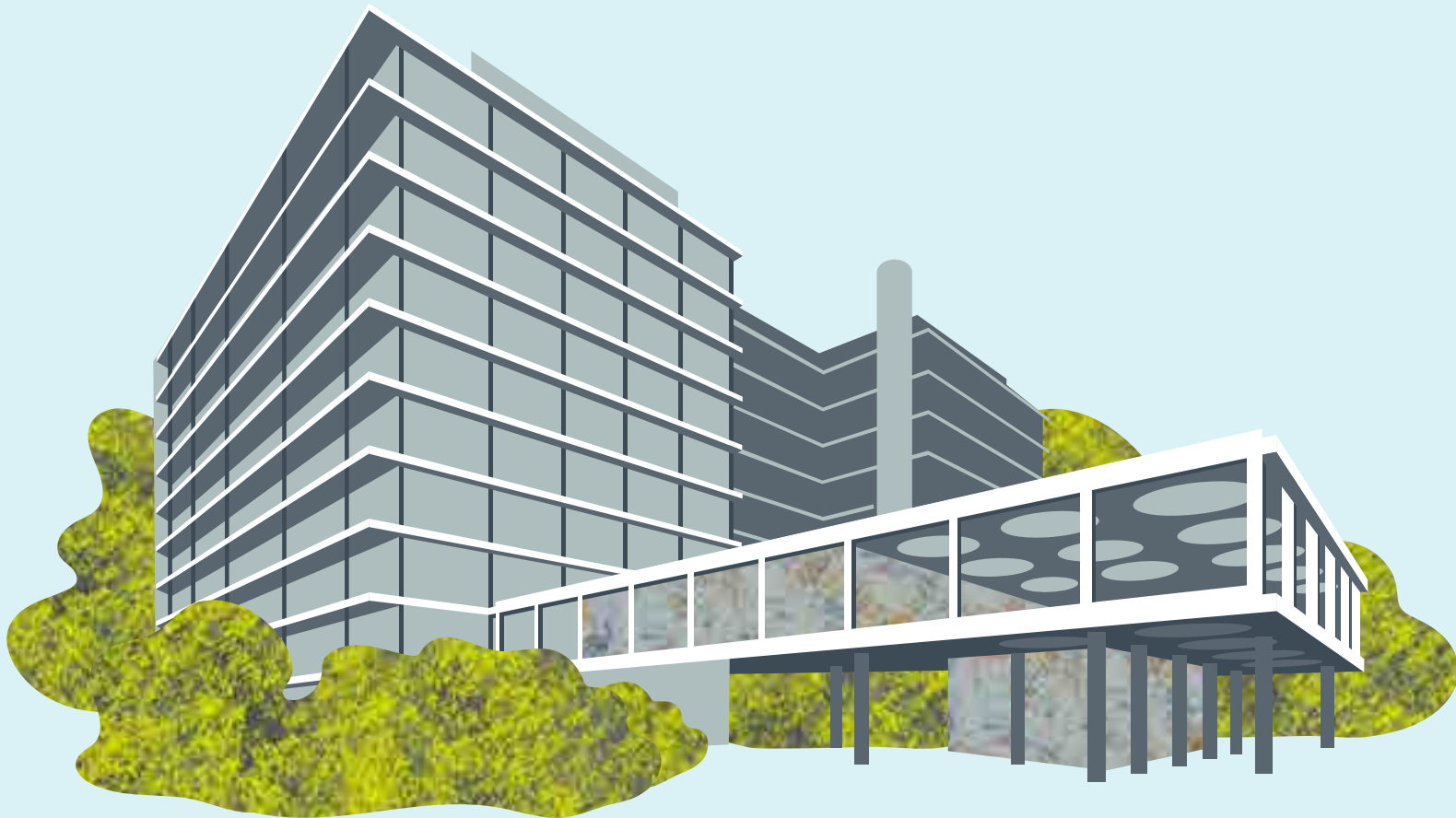
Echo Investment's vision is "creating destinations." It means creating places that attract residents, visitors, passersby, etc.

VALUES

Echo Investment's values set forth in its Code of Conduct:

- EFFICIENCY,
- COMPETENCIES,
- INTEGRITY,
- TRUST,
- RESPECT,
- RESPONSIBILITY.

Echo Investment has not defined its mission.



Archicom’s mission, vision, values and goals

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.

VALUES

- TEAM — We play together, focused on our joint success
- TRUST — We trust each other because we have good intentions
- RESPONSIBILITY — I start with myself, because a lot depends on me
- DEVELOPMENT — We strive to be better every day

GOALS

- Sales of 4,000 apartments per year
- Gratification and satisfaction of clients

Establishing, developing, promoting, and evaluating the corporate culture within the Group

The cornerstones of the Group’s corporate culture are the established values, mission, vision and goals, as well as the Code of Conduct and other internal regulations. The Code of Conduct was introduced at Echo Investment in 2016 and at Archicom in 2023. The Code of Conduct is regularly updated. Changes are driven by changing business conditions, increasing environmental and regulatory requirements, and the Group's growing awareness of its impact on the environment. Each change is communicated to the Group's own employee resources — through the intranet, annual ethics training courses, and exams. The Group's corporate culture is measured by the number and nature of irregularities notified, the number of complaints, lawsuits, and penalties awarded.

Promoting the corporate culture at Echo Investment in 2024:

- annual mandatory ethics training for employees and associates, followed by an exam;
- an article circulated on the intranet regarding the updated whistleblower protection policy, which also provides a reminder of the basic principles thereof; and
- an article promoting whistleblowing channels;
- an article promoting the corporate culture, Code of Conduct, and other procedures in the Group;
- information on the new structure of the Group — a division into a commercial segment (offices) and a residential segment (apartments for rent and student houses);
- a reminder of the Group's fleet policy and safe driving rules.



Promoting the corporate culture at Archicom in 2024:

- annual mandatory ethics training for employees and associates, followed by an exam;
- learning materials circulated on the company’s intranet regarding basic business ethics, donation and sponsorship procedures, and conflicts of interest;
- competitions for employees and associates that promote the Group's mission, vision, and goals, as well as familiarity with Archicom's 2023 Sustainability Report.

Policies and corporate culture development

The Group anchors its corporate culture to a set of policies, procedures, and mechanisms, the most important of which are:

- the Code of Conduct;
- work regulations;
- the Anti-Corruption Code;
- the health and safety policy;
- the environmental policy;
- the sponsorship and donation policy;
- the whistleblowing and handling whistleblowing reports procedure; and
- the recruitment and hiring procedure

The fundamental and superior document of the Group is the Code of Conduct.

In addition to the documents listed above, the Group has introduced and applied a number of other internal regulations that supplement corporate governance in specific areas. The Group does not have a cybersecurity policy.

The Group is in the process of adapting its policies to meet ESRS requirements, and therefore not all MDR-P points have been addressed.

The most important of the above-mentioned policies and documents are available on the websites of Echo Investment and Archicom (in Polish).

The Group's policies related to ethics and responsible business practices apply to all of its employees, but also to contractors. We pay special attention to cooperation with construction companies and architectural firms (regarding safety on construction sites, environmental protection issues, and human rights), as well as architects and other professionals who represent the Group before state and local government institutions (anti-corruption issues, transparent business practices). The Group requires compliance with the principles established in the Code of Conduct from all of the suppliers, subcontractors, brokers, and business partners with whom it has major contracts. Each contractor must

acknowledge the Code of Conduct and sign a statement of compliance with the provisions of the Code, and such acknowledgement and compliance constitute mandatory elements of major construction contracts, which are additionally used for other contracts.

Responsibility for the management of material issues: The Director of the Legal Department (Echo Investment S.A.) and the Management Board Member responsible for compliance (Archicom S.A.).



What does the Code of Conduct cover?

- principles of doing business, including communications with stakeholders,
- due diligence and caution regarding the selection of business partners,
- how to conduct communications with the market (Investor Relations, Marketing, Public Relations),
- selecting and managing cooperation with subcontractors,
- countering human rights violations,
- diversity management 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); and
- data security.



The Group continuously reviews whether the actions of employees, associates, and other internal stakeholders comply with the law, the Code of Conduct, and internal regulations. The main tools for monitoring this issue are the collaborative internal systems for accounting, projects, and management, as well as other relevant procedures. These systems and procedures are designed to detect and identify any deviations or non-standard situations within the Group’s business processes.

Whistleblowing system

The Group maintains a fully implemented and properly functioning system for reporting irregularities, handling reports, and protecting whistleblowers. This system provides for the prompt, independent, and objective investigation of incidents related to business conduct, including such incidents involving corruption and bribery, as well as the investigation of irregularities related to employee issues (including those related to human rights and labor rights).

Whistleblowing channels have been made available to employees and associates (those who provide services to the Group under contracts other than employment agreements), and, from 2024 onwards, they are also available to external entities, including counterparties, contractors' employees on construction sites, clients, and other stakeholders — by way of forms available on the websites of Echo Investment and Archicom.

Whistleblowing channels

The Group allows its stakeholders (employees, persons providing services under agreements other than employment contracts, contractors, employees of subcontracting companies, clients, and other stakeholders), to report any irregularities and concerns in order to monitor risks on an ongoing basis, improve the effectiveness of the compliance system, and enforce the obligations stemming from the Code of Conduct and other internal ethical regulations. This whistleblowing procedure is available to external parties: employees in the Group’s value chain, clients, affected communities, and other stakeholders since the introduction of changes in 2024.

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

The Group provides the following channels for reporting irregularities:

- contacting the designated person responsible for receiving reports in the respective Group company;
- filling out an anonymous electronic form managed by an external entity;
- utilising an anonymous hotline managed by an external entity (Linia Etyki);

- writing a letter and sending it to the external entity (Linia Etyki);
- contacting a direct supervisor; and
- contacting the HR department director.

Reportable matters

Reports can and should include any situations that, in the whistleblower's opinion, are irregular or may have a negative impact on the Group, its workforce, or the external environment, such as:

- breaches of common law,
- breaches of the provisions of the Code of Conduct,
- breaches of any other internal regulations, including, but not limited to, work regulations, safety procedures, financial and accounting procedures, or other procedures, policies, instructions, and orders; and
- all other situations that are inconsistent with the Group's policies, including discrimination, bullying, harassment, and other breaches of labor relations, which are prohibited by common law, corporate documents, as well as by universal ethical standards.

Whistleblowers should also report situations they find concerning that may be irregularities or may violate any laws or protected interests of the Group and/or its employees.





Persons belonging to the Group's own workforce have the opportunity to seek such advice or opinions on ethical issues from the Ethics Committee of their company as well. Detailed information about the Ethics Committees can be found under disclosure G1-3.

### Whistleblowers

According to the Group's policy, whistleblowers may include:

- current employees;
- former employees;
- job applicants;
- collaborators (individuals providing services based on contracts other than employment contracts);
- contractors' employees; and
- external consultants.

The policy limits the scope of potential whistleblowers to the above list; however, the Group has decided to provide a reporting form on the Echo Investment and Archicom websites, allowing anyone interested to submit a report. The Group has not promoted this option.

### Handling whistleblowing reports

In the case of a report in which a potential negative impact is identified in connection with an employee or employees of the Group, the person responsible for receiving reports within a given company is tasked with verifying the provided information and gathering as much evidence as possible. The person must not disclose the identity of the whistleblower or, if the report was anonymous,

attempt to determine their identity. Throughout the process, he or she is obligated to protect the whistleblower's identity and manage the materials in a way that prevents the identification of such person during or after the investigation.

As a next step, the person receiving the report may assemble an ad hoc team. The team's role will be to analyze the information provided and, if breaches are confirmed, recommend corrective actions within the company and determine sanctions for those who have breached ethical standards.

When selecting members of the above-mentioned team, the competencies, specializations, possibilities of conflicts of interest, and the level of trust of a potential team member will be taken into account. Under certain conditions, 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.

The Management Board of an appropriate company (or the Supervisory Board, if a reported issue concerns members of the Management Board) will be informed of all critical problems that occur, including any reported breaches and the consequences thereof.

Every six months the person responsible for receiving whistleblowers' reports in each company will report to the Audit Committee of the Supervisory Board of a given company the functioning of the whistleblowing channels. This report will include the number of reports, their nature, and any actions taken in response.



Breaches concerning employee issues will be handled in the same manner as other whistleblowing reports.

Based on the Investigation Report, further actions may be taken, including:

- implementing additional processes and procedures;
- modifying existing processes and procedures;
- conducting training sessions;
- initiating disciplinary proceedings against an employee;
- reporting to law enforcement authorities;
- other follow-up actions.

**Sanctions**

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:

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

**Report monitoring process**

A whistleblower may receive information on the status of their report, as long as they provided information on how to contact them or provided such contact information to the Linia Etyki

(external entity) when making their report. Feedback may be limited to the extent necessary to ensure the protection of sensitive data, including company secrets, clients, and business partners.

**Protection of whistleblowers**

The Group ensures that whistleblowers will be protected from retaliation. This principle is explicitly expressed in the Code of Conduct, the whistleblower procedure and the procedure for handling reports:

- the Group guarantees that the report will not be the cause of adverse personnel decisions against the whistleblower;
- the Group prohibits any retaliation against the whistleblower;
- the Group ensures that the identity of an anonymous whistleblower will not be the subject of findings during an 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; and
- the Group assures that if it asks the whistleblower to reveal his or her identity during the course of the investigation, then it will protect his or her identity, but will leave the final decision on such disclosure to the whistleblower.

The Group's existing mechanism for protecting whistleblowers from retaliation was designed based on Directive (EU) 2019/1937 of the European Parliament and the Council on the protection of whistleblowers, which was transposed into Polish law in 2024.

**Ethics training**

The most important method of promoting corporate culture and ethical business conduct within 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 and exam are mandatory for all individuals within the Group's own workforce, including new employees (as part of the onboarding process).

The training and the test are conducted using a computer, last approximately one hour, and include descriptions of policies, procedures for specific cases, and control questions. It addresses topics such as the Group's values, ethics in collaboration, human rights and labor rights, corruption and bribery, donations and sponsorships, receiving gifts and expressions of hospitality, conflict of interests, whistleblowing, occupational health and safety, personal data management, and fair marketing.

Upon completing the training, the Group's employees and collaborators are required to pass an exam. This exam consists of 13 multiple-choice questions focused on practical examples of applying the acquired knowledge in daily work.

The results of the training and examination have been presented in the disclosure G1-3.



## Functions most vulnerable to corruption and bribery

The Group assesses that the employees most exposed to the risk of corruption and bribery are those 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); and
2. Contracting construction services, purchasing goods and services.

**G1-2**

### Supplier relationship management

The most important category of suppliers for the Echo Investment-Archicom Group are contractors working on construction sites (construction service providers), which was confirmed during the double materiality assessment. The most important risk identified related to the supply chain is the risk of loss of health or life for the employees of suppliers. The procedures related to managing this issue are detailed in the disclosures from standard S2.

The Group's business activities take place on a large scale, considering the value of contracted work, the number of collaborating companies, and the size of the property development market in Poland. For some construction companies, the Group may be a significant or, periodically, their only client, which generates certain risks for them. Echo Investment and Archicom are aware

of these correlations and therefore make efforts to ensure that collaboration with such companies is mutually beneficial.

**Fair payment practices.** The Group pays its obligations to its contractors, especially small and medium-sized companies, on an ongoing basis. The standard payment term applicable in contracts is 30 days.

**Solidary liability.** If a contractor has issues settling its financial obligations to its subcontractors, the Group will take on this responsibility. The aim is to complete the work on schedule and to relieve smaller companies of the financial issues related to their clients.

**Know-how.** The Group promotes EHE culture among employees on construction sites by way of maintaining high expectations and providing comprehensive support in implementing a safe work environment.

### Preventing late payments to counterparties

The Group does not have a written policy aimed at preventing late payment, with particular reference to small and medium-sized companies. Archicom and Echo Investment have their own payment execution procedures, in which one of the main principles is to pay counterparties on time. The largest companies in the Group are required to report payment terms to the Ministry of Development and Technology.





The Archicom Group maintains a procedure for making transfers, which sets out in detail what conditions must be met in order to make a transfer. The purpose of such procedure is to ensure that the documents necessary to authorise payments are complete, that the related actions comply with all legal requirements, and that the interests of the company are protected. The Echo Investment Group does not have such a written policy or procedure.

**Criteria for selecting contractors and suppliers at Echo Investment**

- price;
- deadlines;
- contractual conditions;
- a scope and length of the warranty offered;
- the credibility of the company, including: projects completed, references and opinions, financial documents, as well as the number of people employed, and any relevant litigation.

**Selection criteria for contractors in the Archicom Group**

- price;
- references (experience in the execution of similar projects);
- length of warranty;
- completion deadlines;
- due date.

**BEST PRACTICES**

**Social and environmental criteria when selecting suppliers of construction services**

Echo Investment Group and Archicom Group have their own procedures, which are similar to each other, for selecting contractors and suppliers. The selection of specific entities and the consideration of social and environmental issues in cooperation with them are based on the following:

- transparent procedures;
- guidelines for the subject matter of the contract (relating to, inter alia, EHS );
- model contracts used, including specific provisions on social (in particular OHS) and environmental issues;
- regular reviews of compliance with EHS requirements;
- statements of contractors.



**Tendering stage**

The procedures of both companies require a background check: at Echo Investment, this occurs at the stage of selecting its recommended contractor, and at Archicom, this takes place at the stage of preparing a list of companies to be invited to tender, but only if the estimated value of the contract exceeds PLN 10 million, or if its scope requires the contractor to have contact with public administration representatives. The background check consists of checking publicly available sources of registration data and information on the reputation and affiliations of potential contractors, as well as their representatives and owners, with persons holding public office.

The Group also assesses potential contractors by utilising its own knowledge base, which takes the form of data stored on the Business Partner 360 IT system.

At Echo Investment, the background check procedure is only required for new counterparties. At Archicom, it additionally covers counterparties with whom the Group has already worked — they are checked once every two years (as long as they enter new tenders).

A required element for each tender is an EHS questionnaire, in which the potential contractor reports on its safety management systems and their compliance with international standards, staff competencies, resources, and general awareness of EHS issues. The information provided in the questionnaire is an additional criterion considered in the selection process of service providers.



It is usually used to assess the amount of the Group's resources, as well as the commitment of its employees, that will be required while the work is being carried out to ensure that such work is being conducted safely and meets the Group's expected standards. At the same time, each contract includes a number of provisions relating to EHS, including annexes setting out guidelines in this area.

The tender procedure also checks the veracity of the information declared by a potential contractor regarding, among other things, certificates held, financial stability, and compliance with tax obligations.

**Contractual provisions**

Contracts with every contractor include provisions for becoming aware of the Group's Code of Conduct and a statement of compliance with the provisions thereof. For information on the content of the Code of Conduct, see disclosure G1-1 above. The mechanism for monitoring contractors in this regard is the whistleblowing system, which was made available to, among others, the employees of contractors on construction sites at the end of 2024. As such, the Group does not yet have adequate data to assess the effectiveness of this system or the scale of any related irregularities.

The contractual provisions allow the Group to enforce certain provisions regarding health, safety, environmental protection, anti-corruption, human rights, labor rights, and standards related to maintaining rest and refreshment facilities. The extent of these provisions, i.e., the contractor's obligations and the principal's rights, depends on the value of the contract. In practice, during the span of the contract, the Group carefully verifies compliance with EHS guidelines, as well as the standards related to facilities, while issues of compliance with human rights, labor rights, and anti-corruption have not been investigated by the Group other than as part of the background check procedure (at the tendering stage) and on rare occasions when irregularities are revealed (e.g. by the media).

The Group does not track the fulfilment of criteria related to social and environmental issues for low-value construction contracts or contracts for activities other than construction (e.g. consultancy, brokerage, marketing). The Group considers all contracts concluded without the involvement of contracting departments as low-value contracts. These are therefore contracts (mandates) for ongoing work on projects that are concluded by senior project managers, project managers, and site managers (construction site directors). By default, they have limited authority to conclude contracts (maximum of PLN 100,000 per contract or in total per contractor per year in Echo Investment and PLN 500,000 in Archicom).

**Prevention and detection of corruption and bribery**

G1-3

Development activity by its nature involves close collaboration with public authorities, as well as negotiating and signing high-value contracts. Consequently, the Anti-Corruption Code and actions supporting transparency are high on the priority list for the Management Boards of the Group.

To prevent, detect, and respond to allegations or incidents related to corruption and bribery, the Group implements the following tools:

- the implementation and regular updating of key ethics policies (Code of Conduct, Anti-Corruption Code);
- the application of anti-corruption mechanisms in the most vulnerable areas (administrative processes, tenders);
- mandatory ethics training concluded with an exam; and
- the operations of the Ethics Committees, which monitor the implementation of policies and provide guidance on ethics-related matters and compliance with regulations.

In addition, the Group has an efficient system for reporting irregularities, handling reports and protecting whistleblowers, which is described in detail in disclosure G1-1.

All ethics-related policies, including those aimed at preventing allegations or incidents of corruption and bribery, are accessible via the intranet to all of the employees and associates of the Group.



The Group promotes these policies and ensures the understanding of their implications by way of a range of activities, detailed in disclosure G1-1.

**Anti-Corruption Code**

The Group has implemented the Anti-Corruption Code, which regulates, in detail, issues associated with cooperating with public officials, as well as issues related to having connections with public figures or public functions.

The Anti-Corruption Code is communicated to all of the employees and associates of the Group during onboarding, through annual ethics training and exams, the intranet, and internal communication channels (meetings, mailings). The Group’s business partners can access the Anti-Corruption Code and other ethics-related documents through the websites of Echo Investment and Archicom. A declaration confirming familiarity with these policies, along with a commitment to act in accordance with them, is included in the current template for agreements with contractors in the form of an annex.

All new contractors who will represent the Group in its dealings with administrative authorities (such as architects) should be verified in accordance with the Group’s background check procedure. This is an executive procedure for examining and verifying specific entities from the perspective of potential compliance or reputational risks.

The Group's Anti-Corruption Code is compliant with the United Nations Convention against Corruption.

In the event of obtaining information about a breach of the Anti-Corruption Code, each employee and associate of the Group is required to notify the Group through one of the designated whistleblowing channels. Reported suspicions of irregularities are handled in accordance with the procedure detailed in disclosure G1-1. According to such procedure, the individuals conducting the investigation, or the relevant investigative committee, will be independent of the management structures involved in the matter. The results of the investigations will be presented to the Management Board of the relevant Company on an ongoing basis, and every six months the person responsible for receiving reports will provide a summary to the Supervisory Board of the relevant Company regarding the reported irregularities as well as the functioning of the system.

In 2024, the Group reviewed its Anti-Corruption Code, updated it, and adapted it to the current conditions and needs of the Group.

**Anti-corruption in administrative processes**

Features and mechanisms related to the process of cooperating with public administrations and public figures that reduce the Group’s risk in connection with issues of corruption:

- employing qualified experts, with the necessary work qualifications, who are trusted, experienced, and whose competencies are well suited to represent the Group and address the relevant risks;
- having detailed procedures in place for handling situations that may involve increased risks (invitations, cooperation with public figures, circumstances of conflicts of interest, gifts);
- participation in meetings with public officials will always take place with at least two representatives of the Group (customary rule);
- having a transparent and multi-staged donation and sponsorship policy in place, which requires a detailed background check of each potential beneficiary, as well as the justification of each operation (each time conducted by the relevant Ethics Committee and approved by the relevant Management Board).

**Anti-corruption in the tendering process**

Features and mechanisms of the contractor selection process that reduce the Group’s risk in connection with corruption-related issues:

- the process involves a large group of experienced experts;
- the process is multi-staged;





- the relevant team verifies offers for correctness and comparability;
- specifically, offers that deviate significantly from the market average or other offers are analyzed in detail. It is not uncommon for such offers to be rejected as a consequence of such detailed analysis;
- procurement, contracting and optimization teams collaborate with construction teams in regard to the selection of subcontractors and suppliers;
- all of the Group's subcontractors and suppliers agree (declaratively) to abide by the Code of Conduct; and
- contracts are signed by two members of the Management Board.

### Communicating anti-corruption policies to stakeholders

The main means of communicating and publicizing the Group's approach to ethical business conduct, including its anti-corruption policies, to its employees (and associates) is through conducting annual ethics training sessions. All approaches to ethical business conduct and anti-corruption policies are communicated to the Group's employees through the intranet, management meetings, onboarding training, occasional posters, etc.

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.

All other stakeholders can access the anti-corruption policies on the websites of Archicom and Echo Investment.

## Ethics training

The most important method of promoting corporate culture and ethical business practices in the Group is through conducting annual training sessions followed by an exam. The training sessions and exam primarily cover the matters described in the Code of Conduct, the Anti-Corruption Code, and the Whistleblowing Procedure. The training sessions and exam are mandatory for all individuals within the Group's own workforce, including new employees (as a part of the onboarding process). The nature, scope, and level of detail of the ethics training sessions have been presented in disclosure G1-1.

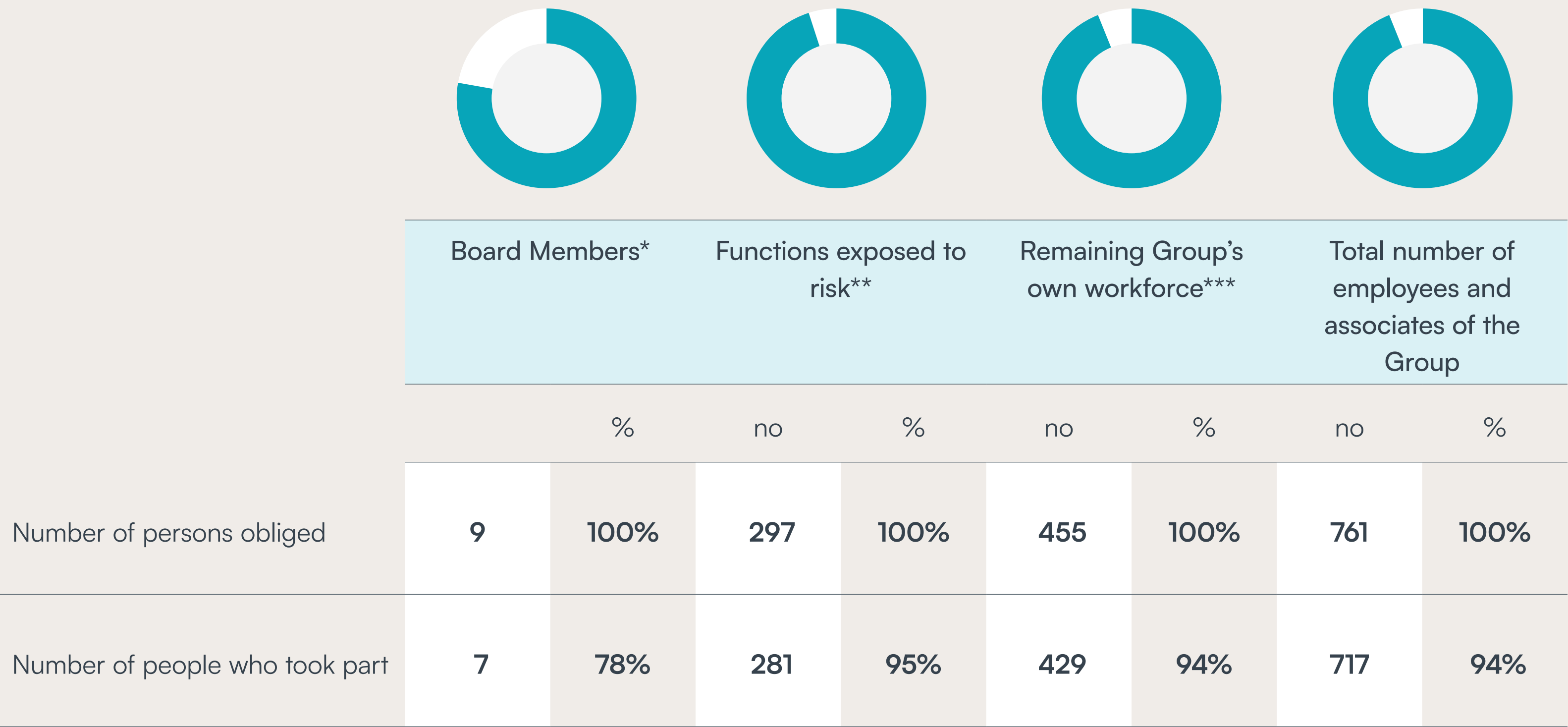
Participation in the training sessions is also mandatory for individuals categorized as being the most exposed to the risk of corruption and bribery. As at 31 December 2024, 297 employees and associates of the Group were included in such categories.

The Group recognizes that all of its employees are exposed to corruption or bribery risks, so the Group requires all employees to undergo annual ethics training sessions and pass a related exam. The Group does not require any additional training sessions or preventive measures for any category or group of employees.

The obligation to undergo the above-mentioned training sessions and complete the related exam also applies to members of the Management Boards. If necessary, or upon explicit request, the Group can provide additional anti-corruption and anti-bribery training sessions for members of the Management Boards and Supervisory Boards. In 2024, there was no such need.



Attend ethics training and pass the 2024 exam



\* Members of the Management Boards of Echo Investment S.A. and Archicom S.A. are taken into account.

\*\* Employees of teams responsible for contracting, procurement of services, and administrative procedures related to projects.

\*\*\* Individuals employed under an employment contract, as well as those regularly performing work for the organization under civil law agreements (e.g., service contracts), excluding individuals provided through employment agencies.

\*\*\*\* The number is current as of the time of sending the training invitation, i.e., mid-November 2024. For this reason, the data may slightly differ from those presented in disclosures S1-6 and S1-7.

Ethics Committees

As stipulated in the Anti-Corruption Code, the implementation, updating and enforcement of its provisions, as well as 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 of both Companies.

As of 31 December 2024, the Ethics Committee of Echo Investment consisted of:

- **Maciej Drozd** — Vice-President, CFO,
- **Bartosz Guziński** — Director of the Legal Department; and
- **Weronika Ukleja-Sałak** — Director of Corporate Communications.

As of 31 December 2024, the Ethics Committee of Archicom consisted of:

- **Agata Skowrońska-Domańska** — Vice-President, CFO,
- **Agnieszka Mickoś-Banasik** — Director of the Legal Department; and
- **Izabela Traczyk** — Director of the Accountancy Department.

The Ethics 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 content and check the proper implementation of procedures (primarily regarding donations and sponsorships). They may also advise employees on matters related to ethics and compliance with internal regulations.



GI-4

Incidents of corruption or bribery

The Management Boards of the Group acknowledge that the implemented management system addressing corruption, bribery, and conflicts of interest, which includes transparent procedural guidelines, is effective. The Code of Conduct and the Anti-Corruption Code clearly indicate what values make up the foundation of the Group's operations and what conduct is required of it, its partners and other stakeholders.

The group does not allow or tolerate any form of corruption within its structure. Each project implemented by the Group involves the necessity to obtain numerous approvals and permits from local authorities and other offices. The Group strictly adheres 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 in conjunction with public authorities on behalf of companies from the Group (such as architects, designers or consultants), designated employees carefully review the reputations of potential representatives, as well as their business operations and associations. The Group does not engage in any political or policy-related activities, and its contacts with local and state government authorities and officials are strictly and exclusively business-related. The Group also does not, whether directly or indirectly, provide any financial or in-kind support to political causes or political organizations.

In 2024, the Group undertook educational initiatives to address violations in connection with the procedures and standards related to anti-corruption and anti-bribery policies. These efforts included publishing articles on the intranet promoting the above-mentioned policies and encouraging the reporting of irregularities or suspicions thereof. The Group also conducted its annual mandatory ethics training sessions, which concluded with an exam. The details of these activities are described in disclosure GI-3 above.

Information on incidents involving breaches of anti-corruption and anti-bribery legislation

In 2024, there were no convictions involving the Group or its employees in connection with their work and no fines were ordered against them for breaches of anti-corruption and anti-bribery legislation.

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).

GI-5

Political influence and lobbying activity

The Group does not engage in any political activity. It does not support, sympathize with or enter into any agreements with political parties, movements, or politicians (financially, in kind, directly, or indirectly).

In both 2023 and 2024, the value of financial and in-kind support for political causes and organizations provided by the Echo-Archicom Group amounted to PLN 0.

As a prominent entity in the real estate development and construction industry in Poland, as well as an active participant in economic and social life, the Group engages in the activities of social and economic organizations that take part in public discussions on issues relevant to its operations. A list of these organizations is provided below.

The Group's representatives do not and have not participated in law-making processes.



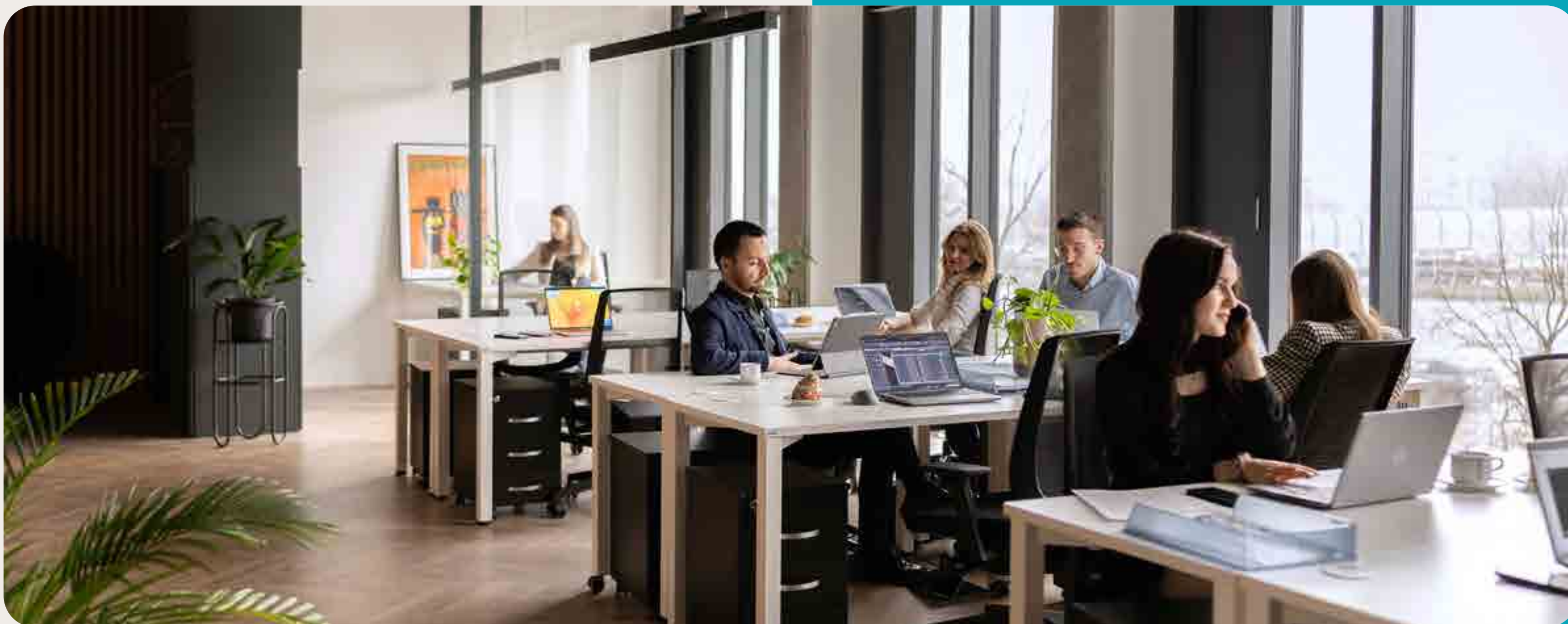
The Group's key Public Affairs issues in 2024 and its position

Topic	The Group's position	Connections with significant impacts, risks, and opportunities
Establishment of a legal framework for REIT/SRWN-type entities in Poland.	The Group supports this solution, as its implementation should contribute to strengthening demand for real estate, primarily by mobilizing local capital. The introduction of this solution may bring market benefits to the Group, the industry, and, in the long term, to the state as well.	Not identified.
Amendments to the so-called Special Housing Act.	The Group supports the proposal by real estate industry representatives to eliminate rigid requirements for the number of parking spaces in projects developed under the Special Housing Act. Maintaining a fixed ratio leads to the construction of parking spaces that remain unsold, unjustified increases in construction costs, and contradicts policies aimed at reducing the number of cars in cities.	The proposed change will contribute to building a resilient city, reducing the number of parking spaces, and promoting public and shared transportation (a key topic: urban development).
Restrictive approach to issuing zoning conditions arising from Aviation Law (the general plan of Warsaw Chopin Airport).	The Aviation Law of 2023 establishes a very large area around Chopin Airport in Warsaw, covering 28% of the city’s surface, where construction work has been frozen, even for projects that do not affect airport operations, unless the area has an adopted local zoning plan.	Not identified.
Integrated investment plans.	The new planning tool, the Integrated Investment Plan (ZPI), allows greater flexibility in the selection of locations and implementation of investments, ensuring compliance with the general plan and enhancing community participation in the decision-making process.	Not identified.
Rules for investor participation in the costs of urban infrastructure development in Warsaw.	To streamline the process of issuing administrative decisions related to construction projects and unify the relevant rules, the city of Warsaw has developed standardized principles for developer participation in financing urban infrastructure.	The Group believes that having clear and precise rules for conducting business activities promotes stability and the development of both the city and businesses.



## 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 part of industry and social organizations that provide us with support, knowledge, inspiration, and insights into the expectations placed upon us.



## Economic organizations

- **American Chamber of Commerce in Poland (AmCham Poland)** — Echo Investment
- **Polish Confederation Lewiatan** — Echo Investment
- **British Polish Chamber of Commerce (BPCC)** — Echo Investment
- **Federation of Polish Entrepreneurs** — Archicom, Echo Investment

## Organizations associating entities from the real estate industry

- **Polish Chamber of Commercial Real Estate (PINK)** — Echo Investment
- **Polish Association of Developer Companies (PZFD)** — Archicom and Echo Investment
- **Polish Council of Shopping Centers (PRCH)**
- **Association of Home and Apartment Builders** — Archicom
- **Polish Association of Construction Employers** — Archicom
- **Urban Land Institute** — Echo Investment

## Other organizations

- **Association of Stock Exchange Issuers (SEG)** — Archicom and Echo Investment
- **Association of Individual Investors (SII)** — Echo Investment
- **Lepszy Służewiec Association** — Archicom and Echo Investment
- **Responsible Business Forum (FOB)** — Archicom and Echo Investment
- **Polish Green Building Council (PLGBC)** — Echo Investment
- **ASPIRE — Association for IT and Business Process Services** — Echo Investment.



Additionally, two representatives of the Group were members of the GRI Club — an international organization bringing together managers from the real estate industry worldwide.

The Group's activities and commitments related to political influence, including activities related to material impacts, risks, and opportunities, are overseen by the Vice President of Finance (CFO) of Echo Investment and the President of the Management Board of Archicom.

The Group is not registered in the EU Transparency Register or the equivalent register in Poland.

No persons were appointed to the Supervisory or Management Boards of Echo Investment S.A. or Archicom S.A. in 2024.

To the Group's best knowledge, neither in 2024, nor in the previous two years, did any of the members of the Management Boards of the Group's companies, or the members of the Supervisory Boards, hold any position in public administration, including regulatory bodies.

GI-6

Payment practices

Echo Investment and Archicom have similar standards regarding contractual terms and conditions for payment, as well as the execution of payments themselves. Echo Investment does not have a separate payment policy, while Archicom has adopted procedures for VAT due diligence and the processing of transfers.

Both companies utilise a similar mechanism to verify counterparties and transactions for potential VAT fraud and abuse. Transfers of more than PLN 15,000 are required to be made using the split payment mechanism and only to an account indicated on the list of registered VAT taxpayers (the so-called white list). Both companies also require the verification of counterparties — creating the so-called counterparty metrics, an analysis that includes information on registration data, licences, and permits held, as well as the empowerment of persons acting on behalf of potential counterparties, and the related organizational and technical backgrounds. This data is archived in the internal Business Partner 360 system. Furthermore, verification also concerns counterparties with whom the Group is bound by contracts (potential payments) with a one-off value or with a total value in a given year exceeding PLN 15 thousand. In addition, in accordance with the procedure, the verification is performed periodically for a random

sample of counterparties that were previously verified as positive, which meet the criteria required by the procedure.

The procedure for the processing of transfers at Archicom sets out internal requirements in this respect, including the process of preparing the necessary documentation, transaction deadlines and the required level of acceptance. Echo Investment applies analogous rules, although such rules are not written down in the form of an official procedure.

None of the companies have raised the issue of payments to small and medium-sized enterprises in connection with the procedures used. The Group has not implemented a special payment procedure for this group of counterparties.

Payment terms are determined by the Group and its counterparties on a case-by-case basis at the stage of contract negotiation and take into account the history of cooperation with the counterparty, industry standards, the scope of the transaction, and the counterparty itself. The standard payment terms are 30 days from the date of the issuance of a correct invoice (for suppliers of services and construction materials) and 7 or 14 days (for smaller suppliers of services and other materials). This approach is applied by the Group to all categories of counterparties.



Information on payment practices within the Group in 2024

Topic	Result
The average time it takes the Group to settle an invoice from the start of the contractual or statutory payment term (number of days)	23.57
The percentage of the Group's payments made in 2024 according to standard terms	84%
The number of ongoing court proceedings related to payment delays involving the Group as a party at the end of 2024	0

Data presentation methodology

The data presented in the relevant procedure relates only to payments to counterparties in commercial transactions and excludes intragroup and related party payments, as well as loans, credits, and bonds. They also exclude the CitySpace entities, which are small in scale and operate in accordance with a different accounting system, so that their consolidation would involve too much work in relation to the improved representativeness of the disclosure obtained and would be subject to high uncertainty. In addition, the data presented does not include four Archicom Group companies whose accounts are kept outside the Group, and these companies do not carry out any significant business activities.

In accordance with the Act on Prevention of Excessive Delays in Commercial Transactions, one company in the Group (Echo Investment S.A.) is obliged to submit the report regarding payment practices in 2024 to the Ministry of Development and Technology. Entities with taxable revenues in excess of EUR 50 million in a given year are required to submit reports in this respect.





5

# EU Taxonomy



## Introduction

The EU Taxonomy is a unified tool developed by the European Union that classifies economic activities according to their environmental sustainability. Its main objective is to support the transformation of the economy towards a greener and climate-neutral model of development, in line with the European Green Deal. The EU Taxonomy is a key element of regulation to support sustainability financing and transparency in business operations.

The EU Taxonomy was established by Regulation (EU) 2020/852, which came into force on 1 July 2020. It includes six environmental objectives:

- a. climate change mitigation;
- b. climate change adaptation;
- c. sustainable use and protection of water and marine resources;
- d. the transition to a circular economy;
- e. pollution prevention and control; and
- f. protecting and restoring biodiversity and ecosystems.

According to the systematization, an environmentally sustainable business activity is one that simultaneously fulfills the requirements indicated below:

- a. makes a significant contribution to one or more of the above-mentioned environmental objectives;
- b. meets the technical eligibility criteria (TKK) for the environmental objective in question;

- c. does not cause serious harm to any environmental objective; and
- d. is carried out in accordance with minimum safeguards

Any company subject to the obligations under Regulation (EU) 2020/852 is required to disclose three key indicators:

- the percentage of turnover;
- the percentage of capital expenditures (CapEx); and
- the percentage of operational expenditures (OpEx) corresponding to assets or processes related to business activities that can be considered environmentally sustainable.

The activities carried out by a company can be classified in one of three categories:

- a. **Activities eligible for systematization - environmentally sustainable**
  - described in the delegated acts;
  - meeting the criteria set out in Article 3 of Regulation (EU) 2020/852 of the European Parliament and of the Council.
- b. **Activities eligible for systematization - environmentally unsustainable**
  - described in the delegated acts;
  - not meeting some or all of the requirements set out in Article 3 of Regulation (EU) 2020/852 of the European Parliament and of the Council.

### Glossary of abbreviations and terms used



**CapEx** - capital expenditures;

**BHRRC** - Business & Human Rights Resource Centre: an international NGO that works to promote human rights in business;

**CCM** - climate change mitigation;

**DNSH** - Do No Significant Harm;

**KPIs** - Key Performance Indicators;

**NACE** — (fr.) Nomenclature statistique des Activités économiques dans la Communauté Européenne, statistical classification of economic activities in the European Union;

**OECD** - Organisation for Economic Cooperation and Development;

**OpEx** - operational expenditures;

**PKD** - Polish Classification of Activities;

**SPV** - Special Purpose Vehicle, a special purpose vehicle that is created for a specific purpose, usually to implement a specific project or to achieve a specific financial, operational or legal objective; and

**TKK** - technical qualification criteria, the detailed requirements set out in the EU Taxonomy that an economic activity must meet in order to be considered eligible for the sustainability systematics.



c. **Non-systematic activities**

- not described in the delegated acts; and
- for which no technical qualification criteria have been established.

Compliance with the technical qualification criteria for all six environmental objectives of the EU Taxonomy must be assessed in accordance with Commission Delegated Regulation (EU) 2022/1214, which was adopted on 9 March 2022 and published in the Official Journal of the EU on 15 July 2022. According to these regulations, a company being covered by the obligations of the EU Taxonomy must include all objectives in the disclosure.

**Disclosures of the EU taxonomy**

The calculation of Echo Investment Group's environmentally sustainable activities was carried out on the basis of the applicable regulations, in particular:

- **Regulation (EU) 2020/852 of the European Parliament and of the Council** of 18 June 2020 - establishing a framework to support sustainable investments and amending Regulation (EU) 2019/2088;
- **Commission Delegated Regulation (EU) 2021/2139** of 4 June 2021 - setting out technical criteria for the qualification of an economic activity as making a significant contribution to climate change mitigation or adaptation, and

that the activity does not cause significant harm to other environmental objectives;

- **Commission Delegated Regulation (EU) 2021/2178** of 6 July 2021 - supplementing the provisions on the disclosure of information on sustainable business activities by companies covered by Articles 19a and 29a of Directive 2013/34/EU, together with specifying how to comply with this obligation;
- **Commission Delegated Regulation (EU) 2022/1214** of 9 March 2022 - amending Regulation (EU) 2021/2139 as regards activities in selected energy sectors and Regulation (EU) 2021/2178 regarding the disclosure of detailed information on those activities;
- **Commission Delegated Regulation (EU) 2023/2485** of 27 June 2023 - introducing additional technical eligibility criteria for selected activities, specifying conditions for their contribution to climate change mitigation or adaptation and compliance with the “do no significant harm” principle for other environmental objectives; and
- **Commission Delegated Regulation (EU) 2023/2486** of 27 June 2023 - which establishes technical eligibility criteria for activities that support environmental objectives such as the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and the protection of biodiversity. This regulation also amends the provisions on the disclosure of detailed information about these activities.

**Description of the process for verifying the eligibility of activities for the EU Taxonomy**

For the purpose of preparing the disclosures for 2024, Echo Investment Group, in accordance with the provisions of the activities indicated in the annexes of Commission Delegated Regulation (EU) 2021/2139, reviewed its own activities and those of the individual companies in the Group in order to separate the activities that qualify for systematization. The scope of the review included subsidiaries included in the consolidated financial statements of the Echo Investment Group. The identification of eligible activities was carried out on the basis of descriptions of activities in the systematics and evaluation of activities carried out at the Group level, as well as at the level of individual projects carried out in SPVs and, as a subsidiary, on the basis of PKD/NACE classification. Where the project description matched the activity description in the systematics, the activity was identified as eligible. Environmental objectives were then assigned to individual activities, against which an assessment of meeting the criteria for significant contribution was carried out, and an assessment of compliance with the "do no significant harm" (DNSH) principle was carried out for the remaining environmental objectives in the next step. All of Echo Investment Group's identified activities in 2024 only make a significant contribution to the **climate change mitigation (CCM) objective**.

The verification of the assignment of activities to the EU Taxonomy was carried out by the ESG Team, while the process of overseeing



the appropriate assignment of PKD codes for special purpose vehicles (SPVs) was carried out by the Head of Legal Affairs.

The work carried out and identified the following activities eligible for systematization:

**Activity 6.5 Transport of motorbikes, passenger cars and light commercial vehicles**

Purchase, financing, renting, leasing, and operating of vehicles belonging to categories M1 and N1, which are covered by Regulation (EC) No 715/2007 of the European Parliament and of the Council, or to category L (two- and three-wheel vehicles and quadricycles). The economic activities belonging to this category can be linked to a number of NACE codes, in particular H49.32, H49.39 and N77.11 according to the statistical classification of economic activities established by Regulation (EC) No. 1893/2006.

The Group's business activity under Activity 6.5 Transport by motorbikes, passenger cars and light commercial vehicles involves the use of passenger vehicles for business purposes.

**Activity 7.1 Construction of new buildings**

The execution of construction projects for the construction of residential and non-residential buildings through the accumulation of financial, technical and physical resources for the completion of building projects intended for subsequent sale, as well as construction work for the erection of complete residential and non-residential buildings, either on their own account for sale or

on a fee or contract basis. The economic activities falling under this category can be linked to a number of NACE codes, in particular F41.1 and F41.2, including activities falling under code F43 according to statistical classification of economic activities established by Regulation (EC) No. 1893/2006.

The business activity carried out by the Group under Activity 7.1 New building construction concerned the implementation of all investment projects carried out by the Group during the 2024 reporting period, which included:

- the construction and sale of commercial (office and retail), collective residence and residential buildings; and
- the management of development projects for other parties.

**Activity 7.7. Acquisition and ownership of buildings**

The purchase of immovable property and the exercising of ownership rights over that property. The economic activities falling under this category may be linked to the NACE code L68 according to the statistical classification of economic activities established by Regulation (EC) No. 1893/2006.

The Group's business activities under Activity 7.7. Acquisition and ownership of buildings, include the rental of office, retail, and residential space.

The Echo Group's eligibility process during the reporting period under review did not identify any eligible activities other than those listed above.

**Assessment of compliance of the activity with the criteria of significant contribution and "do no significant harm" (DNSH)**

The assessment of compliance of the above-mentioned activities with the technical qualification criteria set out in the annexes of Commission Delegated Regulation (EU) 2021/2139 was carried out in two stages:

1. **Stage one: assessing the fulfillment of the criteria of significant contribution for the activities classified in the EU Taxonomy.**

Within the individual activities that qualified for the EU Taxonomy in the Echo Group, the significant contribution criteria indicated below were assessed:

- **For CCM Activity 6.5 Transport by motorbikes, passenger cars and light commercial vehicles:** an assessment was made of the vehicle fleet owned by Echo Group companies in terms of the emissions performance of individual vehicles. As these vehicles all have internal combustion engines, it was not possible to demonstrate compliance with the criterion of making a significant contribution to the climate change mitigation target.
- **For CCM Activity 7.1: Construction of new buildings:** the Group's selected investment projects were assessed in terms



of how they met the following criteria for the **climate change mitigation** objective:

- the primary energy demand (PED) is at least 10 per cent below the required threshold;
  - the carrying out of air leakage and thermal integrity tests after construction; and
  - the Global Warming Potential (GWP) calculated for each life cycle stage, which is disclosed to investors and clients upon request.
- **For CCM Activity 7.7 Acquisition and ownership of buildings:** the Group's selected investment projects were assessed in terms of how they met the following criteria for the **climate change mitigation** objective:
    - For buildings constructed before 31 December 2020: belonging to the 15 percent of the most efficient buildings in the country/region in terms of primary energy demand (PED) indices determined on the basis of a communication on the website of the Ministry of Development and Technology, confirmed by relevant evidence.
    - For buildings constructed after 31 December 2020: the fulfillment of the criteria set out in Section 7.1 of the Annex in force at the time of acquisition.
    - For large non-residential buildings (>290 kW output of heating, ventilation or air-conditioning systems): efficient energy management through performance monitoring and evaluation.

The Group did not demonstrate compliance with the technical eligibility criteria for some of the completed projects in activities 7.1 and 7.7 generating low rates, mainly due to the lack of adequate documentation confirming compliance, the high cost of carrying out full compliance verification or the high cost of introducing additional technological solutions.

The Echo Investment Group, as the general contractor for the Office House project, which is being built as part of a larger development called Towarowa 22, also assessed the building's compliance with the criteria for significant contribution, as it derives income from Activity 7.1 "Construction of new buildings" through this service.

## 2. **Stage two: the assessment of the fulfillment of the criteria of not causing serious harm to the remaining environmental objectives for the activities classified in the EU Taxonomy.**

The next step in assessing the compliance of the activities with the EU Taxonomy was to assess whether the qualified activities met the criteria of not causing serious harm. The specific DNSH criteria vary depending on the taxonomic activity.

Echo Investment Group assessed the DNSH criteria for all activities eligible for the EU Taxonomy. This assessment primarily included the following:

- **Under climate change adaptation:** the carrying out of an analysis of climate change risks and the implementation of adaptation solutions as part of the investment.
- **Within the framework of sustainable use and conservation of water and marine resources:** the confirmation of water consumption parameters for sanitation.
- **As part of the transition to a circular economy:** verification of the criterion of 70 percent of construction waste prepared for reuse, recycling, or recovery and the evaluation of construction techniques that support circularity.
- **As part of pollution prevention and control:** assessing the use and presence of chemicals, formaldehyde, and CVOC emissions, as well as the potential for land contamination and emissions of noise, dust, and other air pollutants.
- **In the framework of the protection and restoration of biodiversity and ecosystems:** the identification of the land on which the building is erected in terms of its importance for biodiversity (for Activity 7.1).

An assessment of the DNSH criteria was not carried out for Activity 6.5, due to this activity not meeting the criteria for a significant contribution.



## Assessment of compliance with minimum safeguards

The assessment of compliance with the minimum safeguards was carried out in accordance with Article 18 of Regulation (EU) 2020/852 of the European Parliament and of the Council. According to this provision, the minimum safeguards cover the procedures implemented by a business enterprise to ensure compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. They also include the principles and rights set out in the eight fundamental conventions identified in the ILO Declaration on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

The purpose of the Minimum Safeguards is to set standards in terms of social and ethical standards by which a company should operate in order for its actions to be defined as sustainable. This means that the company must not cause any harm or violate any laws or regulations related to four themes: taxation, fair competition, corruption, and human rights.

Based on the guidelines set out in the October 2022 Final Report on Minimum Assurances from the European Commission's advisory body, the Platform on Sustainable Finance, Echo Investment Group in 2024, reviewed policies and processes and verified breaches related to the aforementioned aspects using relevant databases.

The verification of compliance with the minimum safeguards was carried out at the level of the entire organization in an aggregated manner, taking into account the entire supply chain. This approach allowed for a comprehensive assessment of the company's processes and activities within and beyond its boundaries, eliminating the need to analyze each project or activity individually.

The Sustainable Finance Platform has identified the following grounds for failure to meet the minimum safeguards:

- a. Inadequate or non-existent human rights due diligence processes, including employee rights.
- b. The entity does not have anti-corruption processes in place and the company does not treat tax governance and compliance as an important part of its oversight and does not have adequate tax risk management strategies and processes in place. In addition, the entity does not promote awareness among employees of the importance of complying with all applicable competition laws and regulations.
- c. The entity has been finally held accountable or found to have violated labor or human rights law in certain types of labor or human rights court cases. The entity or its senior executives, including senior executives of its subsidiaries, have been finally convicted by a court of corruption or anti-competitive practices.

- d. The entity refused to dialogue with the OECD National Contact Point (hereafter OECD NCP) regarding the notification accepted by the OECD NCP.
- e. The Business and Human Rights Resource Centre (BHRRC) has made an allegation against an individual and the individual has not responded within 3 months.

### → Premise 1

The Echo Investment Group has a due diligence process in place for human rights, including labor practices. In this regard, in 2024, the Group established a procedure for compliance with the minimum safeguards, comprising five stages of the due diligence process in line with OECD guidelines. The key activities for each of the stages are outlined below.

### 1. Integrating the principles of responsible business conduct into policies and systems

Echo Investment Group has permanently incorporated provisions on human rights into the Group's Code of Conduct. In terms of employee rights, the following are in place in the Group: work regulations, remuneration regulations, bonus regulations, company social benefits fund regulations, internal notification procedure, regulations for the election of employee representatives, documentation of professional risk assessment, and the Group's data security policy.



## 2. Identification and assessment of negative impacts related to company operations, in the supply chain or in relationships

The identification and assessment of negative impacts is conducted as part of a double materiality assessment (DMA) in line with the ESRS Standards, which aims to identify and assess the materiality of impacts, opportunities, and risks in relation to human and employee rights, among others. The issue of human and employee rights is also raised as part of the business risk analysis and internal audit process, which examines selected areas of business activity identifying risks and areas for improvement that may impinge on responsible business issues. Contracting, health and safety, HR and other teams are also involved in the business risk analysis process. The company also surveys employees and contractors in the value chain to determine their compliance with minimum safeguards.

## 3. Halting, preventing or mitigating negative impacts

Taking action to stop, prevent, mitigate, and remedy adverse impacts is carried out through an implemented whistleblowing system. The whistleblowing system includes detailed actions when reports occur including the documentation of actions and the preparation of a report on actions taken and lessons learned for senior management.

## 4. Monitoring the effectiveness of the measures taken

Monitoring of the implementation and effectiveness of the company's due diligence activities takes place at the level of each of the previous business process steps and is carried out by the teams responsible for the various policies and processes implemented in the Group. Monitoring is carried out on a continuous basis and is an integral part of business practice.

## 5. Informing about the course of action in case of negative impacts

Communicating how to deal with violations involves several channels of communication targeting stakeholders directly affected by human rights and employee rights. In this regard, the HR team conducts continuous communication with employees. With regard to suppliers and value chain partners, human and worker's rights issues are addressed through ongoing communication by the contracting and investment implementation team, as well as through the health and safety team and supervision.

## 6. Taking remedial actions

In the event of adverse effects, Echo Investment Group shall take adequate remedial action in relation to the damage done, including cooperation with the relevant authorities and the use of lawful remedies

## → Premise 2

The Echo Investment Group has an Anti-Corruption Code in place, according to which the risk of the possibility of corruption cases is identified and monitored both in its own operations and in its cooperation with business partners in the value chain. The process of identifying and analyzing corruption risks is supervised by the Directors of the Legal Departments of Echo Investment and Archicom. In order to counteract the possibility of corruption cases, anti-corruption clauses are also included in contracts with partners, which require them to comply with the relevant regulations.

In terms of tax integrity, the Group has a tax strategy in place, which is implemented by the Finance and Tax and Transfer Pricing Teams. The aim of the strategy is to comply with the due tax legal requirements, to analyze the tax consequences arising from organizational changes, and to follow the relevant processes related to tax risk management.

In the area of ensuring fair competition, the Group implements internal communication for employees related to this issue in order to counter anti-competitive behavior.



**→ Premise 3**

Echo Investment Group carried out verification that there were no final convictions against the Group during the reporting period in the area of human rights, including labor rights, corruption, taxation and fair competition. As a result of such verification, no information was identified that would cause it to fail to comply with the minimum safeguards.

**→ Premise 4**

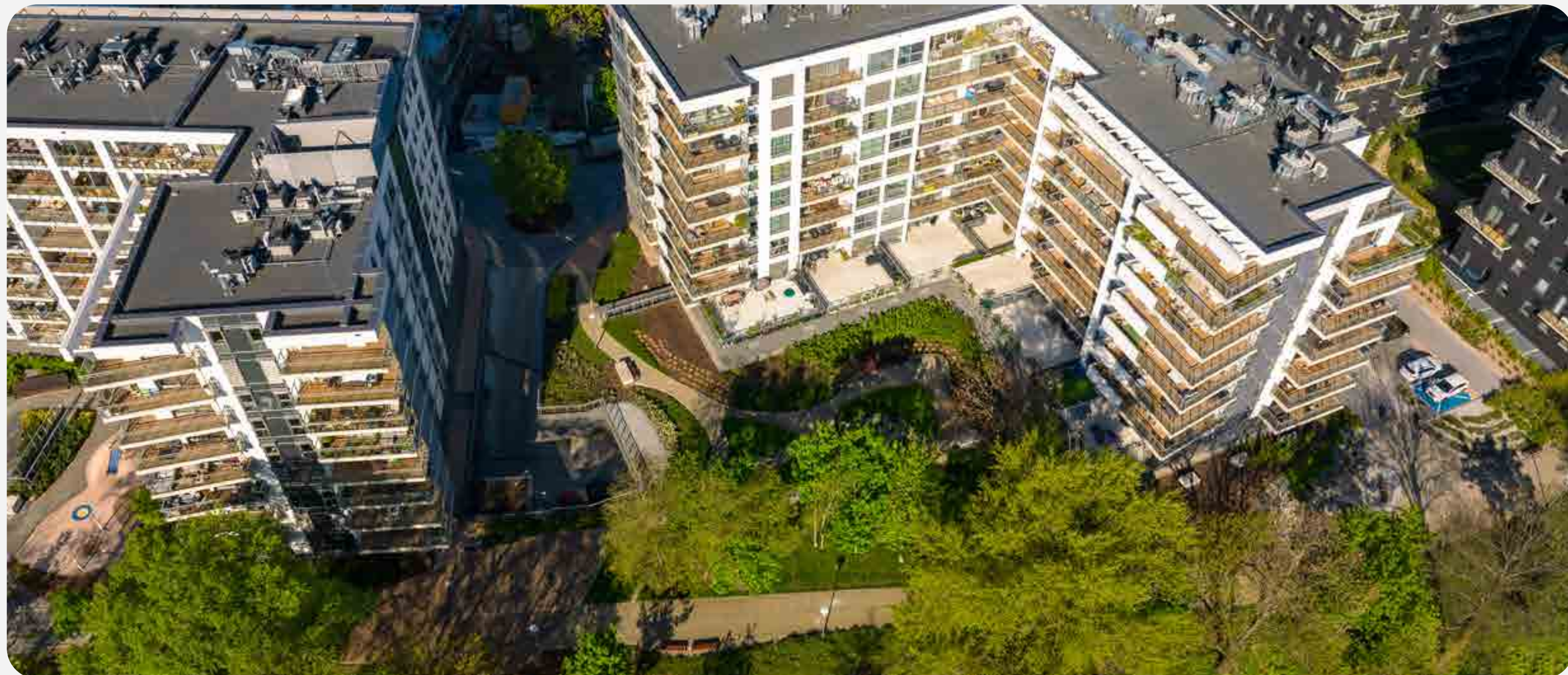
Echo Investment Group carried out a verification of the OECD NCP notification database, which showed that no notifications occurred in relation to Group companies during the period covered by the verification. Thus, there was no dialogue with the OECD NCP during the period indicated [<http://mneguidelines.oecd.org/database/>].

**→ Premise 5**

Echo Investment Group has verified the Business and Human Rights Resource Centre's (BHRRC) reporting database, which showed that no reports occurred in relation to Group companies during the period under review [<https://www.business-human-rights.org/en/companies>].

## Presentation of activities aligned with the EU Taxonomy during the reporting period

The following is a summary of the Group's projects that have been classified as environmentally sustainable following an assessment of compliance with the material contribution criteria, the DNSH criteria and an assessment of the fulfillment of the minimum safeguards.





Name of the investment	City	Stage	Type of activity	Environmental objective
Swobodna I — Office	Wrocław	Under construction	7.1	Mitigating climate change
Wita Stwosza — Office	Kraków	Under construction	7.1	Mitigating climate change
Brain Park AiB — Office	Kraków	In operation	7.7	Mitigating climate change
Brain Park C — Office*	Kraków	In operation	7.7	Mitigating climate change
React — Office*	Łódź	In operation	7.7	Mitigating climate change
Galeria Libero — Retail*	Katowice	In operation	7.7	Mitigating climate change
Office House Towarowa 22 project management for JV	Warsaw	Under construction	7.1	Mitigating climate change
MidPoint 71 Office Space	Wrocław	In operation	7.7	Mitigating climate change
City Forum City 2 — Office Office space	Wrocław	In operation	7.7	Mitigating climate change
React* Office space	Łódź	In operation	7.7	Mitigating climate change
City Forum — Office	Wrocław	In operation	7.7	Mitigating climate change
MidPoint 71 Office space leased by Archicom for its own offices	Wrocław	In operation	7.7	Mitigating climate change

\*16 December 2024 saw an update to the Ministry of Development and Technology's guidelines on the level of primary energy requirements for the 15 percent and 30 percent most energy-efficient buildings built before 31 December 2020 for which an energy performance certificate has been drawn up. The said update raised the requirements to meet the technical verification criteria of the EU Taxonomy, affecting the assessment of compliance for the Galeria Libero, React, and Brain Park C investments.

The data in this report has been reported in line with the Ministry of Development and Technology's recommendation of 14 February 2025, which indicates that the update published on 16 December 2024 should be used from 1 January 2025 in sustainability reporting (including the EU Taxonomy). [<https://www.gov.pl/web/rozwoj-technologia/Taksonomia-zrownowazonego-finansowania-inwestycji-budynki>].

Consequently, the Galeria Libero, React, and Brain Park C projects have been deemed compliant throughout the period for which these disclosures have been prepared.



## Accounting policy and contextual information

Corresponding revenue (Turnover), operating expenditures (OpEx) and capital expenditures (CapEx) were assigned to each identified activity that was determined to be eligible and compliant with the EU Taxonomy. The same accounting policies as those used in the consolidated financial statements of the Echo Investment Group, prepared in accordance with the International Reporting Standards, were applied to calculate the ratios. The Group did not make any changes to its accounting policies in 2024. The data for the calculations came from the Group's accounting and financial system. No estimates or allocations of turnover, capital expenditures and operating expenditures were required for the data presented. The Group ensured the elimination of double counting in the allocation of turnover, capital expenditures (CapEx) and operating expenditures (OpEx) by analyzing the source data for each Group company, and by applying appropriate consolidation exclusions that allowed the KPIs to be accurately allocated and avoided double-counting.

### Key indicators related to turnover

The key performance indicator (KPI) related to turnover has been calculated in accordance with the requirements of Delegated Regulation (EU) 2021/2178. This indicator represents the ratio of revenue from activities respectively qualified or compliant with the EU Taxonomy (numerator) to the total revenue disclosed in Echo

Investment Group's consolidated financial statements for 2024 (denominator).

The turnover KPI numerator includes all revenues from qualifying and environmentally sustainable activities, as defined in Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council, excluding accounting items that do not comply with the definition of qualifying activities within the systematic framework. The denominator of the ratio includes all revenue disclosed in the Group's consolidated income statement for 2024 (Note 1 of the Echo Investment Group Consolidated Financial Statements).

All turnover qualifying and in line with the EU Taxonomy, related to revenue from contracts with customers (IFRS 15).

During the reported period, the Group did not carry out business activities in line with the systematic conducted for own consumption of a non-financial enterprise.

### CCM Activity 6.5: Transport by motorbikes, passenger cars and light commercial vehicles

No revenue has been identified for Activity 6.5 in the 2024 reporting year.

### CCM Activity 7.1: Construction of new buildings

The portion of the Group's net revenue resulting from the sale of residential buildings, which was recognized at the time of the handover of the sold premises to the buyer, i.e. after the formal

completion of the construction and the obtainment of an occupancy permit for the building, was classified as turnover. In addition, revenue from construction management services provided by the Echo Investment Group to third parties, including the Office House project in the Towarowa 22 complex in Warsaw, was also included as turnover.

### CCM Activity 7.7: Acquisition and ownership of buildings

The revenue generated from the rental of buildings in the 2024 reporting year, which are owned by the Group, as well as the revenue generated from the rental of space to third parties, which was generated while the uncompleted construction projects were still under construction, qualified for the turnover KPI.

Turnover (PLN thousand)	
Total turnover in 2024	1,083,405
Turnover aligned with the systematics in 2024	141,458
%	13.06%



### Key indicators related to capital expenditures (CapEx)

The key performance indicator (KPI) related to capital expenditures has been calculated in accordance with the requirements of Delegated Regulation (EU) 2021/2178. This indicator represents the ratio of the sum of qualifying and taxonomy-compliant capital expenditures to denominator-compliant capital expenditures as disclosed in the Echo Investment Group's consolidated financial statements for 2024, respectively.

The capital expenditures incurred by the Group in 2024 on EU Taxonomy-compliant activities related to increases in self-generated fixed assets (100 percent).

The denominator was based on the Echo Investment Group's capital expenditures comprising additions to property, plants and equipment, investment property, and intangible assets during the financial year, before depreciation, amortization and any revaluations, including those arising from revaluations and fair value losses, and additions to property, plant, and equipment and intangible assets arising from business combinations (Notes 13, 14, 15, 16, 17 in the Echo Investment Group Consolidated Financial Statements).

### CCM Activity 6.5: Transport by motorbikes, passenger cars and light commercial vehicles

Within capital expenditures (CapEx), new leases qualified for the counter.

### CCM Activity 7.1: Construction of new buildings

Information on the size of the KPIs for individual projects under Activity 7.1 was obtained from the Echo Investment Group's accounting system. Capital expenditures (CapEx) are, in classic accounting terms, for the acquisition, modernization, construction, adaptation, or renewal of fixed assets related to system-eligible or system-compliant activities. In relation to Activity 7.1, the

decision to report compliance for capital expenditures was made on the basis of the Investment CapEx Plans, which assume that adequate capital expenditures is secured to meet the technical eligibility criteria during the development process. The following are highlights of the CapEx Plans that were in place for two of the Group's developments.

Number and name of activity	Environmental objective	Name of the project	Total capital expenditures planned for the project under the CapEx Plan (PLN thous.)	Total capital expenditures for aligned activities spent in 2024 (PLN thous.)	Planned completion date of the investment under the CapEx Plan
7.1 Construction of new buildings	Climate Change Mitigation (CCM)	Swobodna A	81,745	34,695	2025
7.1 Construction of new buildings	Climate Change Mitigation (CCM)	Wita Stwosza B, C	96,370	12,470	2025



The expenditures outlined above in relation to the plan to bring the Swobodna A office investment in Wrocław into compliance with the EU Taxonomy in terms of meeting the criteria for significant contribution and the criteria related to the DNSH principle, have been expensed in 2023-2024 and budgeted for the financial year 2025. Thus, the period over which the Swobodna investment under activity 7.1 is expected to be compliant with the EU Taxonomy is 2025, which is also the year of completion of the investment. The CapEx plan for the Swobodna investment has been approved by the Board.

In the case of the Office House project in the Towarowa 22 complex in Warsaw, the compliance reported by the Group was determined in relation to the scope for which Echo Group is responsible, acting as a joint venture (JV) replacement investor, i.e. the construction phase of the building. The compliance requirements for the entire development were assessed by the JV at its level. Residential development projects involving the construction of residential buildings carried out by the Group were not classified as compliant with the definition of the numerator, due to the fact that all capital expenditures are treated as costs related to the creation of the final product, in this case residential with flats for sale and not for own use. Consequently, residential development projects have been treated as inventory (current assets) as their purpose is to be sold and not used by the company. As a result, the capital expenditures (CapEx) associated with the construction was defined as non-existent (PLN 0.00) in these categories.

In the case of development projects involving the construction of non-residential buildings, Echo Investment Group qualifies expenditures related to building design and land acquisition, construction costs and technical infrastructure, as well as certification expenses.

CCM Activity 7.7: Acquisition and ownership of buildings

Within capital expenditures (CapEx), acquisitions of fixed assets (2.19 percent), as well as capital expenditures on investment property (90.87 percent), including the purchase of investment property (53.02 percent) that is not land and long-term leases, are classified in the numerator.

Capital expenditures (CapEx) (PLN thousand)	
Total capital expenditures (CapEx) in 2024	346,586
Capital expenditures (CapEx) aligned with the systematics in 2024	83,657
%	24.14%

Key indicators related to operational expenditures (OpEx)

The key performance indicator (KPI) related to operational expenditures, has been calculated in accordance with the requirements of Delegated Regulation (EU) 2021/2178. This indicator represents the ratio of eligible and taxonomy-compliant operational expenditures, respectively, to the portion of operational expenditures compliant with the definition of the OpEx KPI denominator indicated in the EU Taxonomy.

The denominator was based on Echo Investment Group's operating expenses for maintenance activities, repairs, and any other direct expenses incurred by the Group in connection with the day-to-day operation of property, plants, and equipment, and maintaining them in proper condition, i.e:

- costs related to research and development;
- costs of repairs and renovations to buildings that do not increase their value;
- costs associated with short-term leasing;
- maintenance and repair costs for other fixed assets such as cars, which did not increase their value;
- any other direct expenditures related to the day-to-day servicing of tangible fixed assets by a company or a third party to which activities necessary to ensure the continuous and efficient operation of those assets have been outsourced.



**CCM Activity 6.5: Transport by motorbikes, passenger cars and light commercial vehicles**

Under operating expenses (OpEx), costs related to the purchase of parts, materials and accessories, as well as costs related to the repair and maintenance of leased cars, were included in the numerator.

**CCM Activity 7.1: Construction of new buildings**

In the case of residential development projects developed by Echo Investment Group, this division is not made, as all operating expenses are treated as costs related to the creation of the final product, e.g. a residential building with flats for sale. Accordingly, residential development projects have been treated as inventories (current assets), as their purpose is to be sold and not used by the company. As a result, operating expenses (OpEx) related to construction were defined as non-existent (PLN 0.00) in these categories.

**CCM Activity 7.7: Acquisition and ownership of buildings**

Included in the operating expenditures (OpEx) to the numerator are funds earmarked for ongoing operating costs in line with the systematic targeted maintenance of owned buildings in proper working order.

When the Group leases commercial space to third parties, it incurs expenses related to the ongoing maintenance of these assets. These include adaptations, renovations, and the maintenance of premises and offices, as well as repairs to equipment,

which are also carried out as part of substitute contracting. Building renovation and maintenance activities also relate to buildings owned by the Group and used by the Group in connection with its operations.

Operating expenditures (OpEx) (PLN thousand)	
Total operating expenditures (OpEx) in 2024	1,301
Operating expenditures (OpEx) aligned with the systematics in 2024	1
%	0.08%

**Restatement of comparative data for 2023**

Echo Investment Group, as part of its taxonomy disclosures, annually reviews its revenue-generating projects, capital expenditures incurred and the operating costs of its operations in relation to the extent to which they are environmentally sustainable. In the course of preparing the 2024 disclosures, it was recognized that selected investments carried out by the Group were incorrectly reported in the previous year, inappropriately attributed to Activity 7.7 Acquisition and ownership of buildings, relating to buildings in use at the time of reporting, instead of Activity 7.1 Construction of new buildings. In addition, an amount of PLN 11,216 thousand related to re-invoicing and sales agency was incorrectly assigned to eligibility for Activity 7.1, in the context of turnover generated. As part of the revision of the approach to the EU Taxonomy made in 2024, it was also identified that several investments in the previous period were not included in the reporting.

From 2024 onwards, due changes have been implemented in the reporting of the EU Taxonomy and the comparative data has been recalculated according to the newly adopted rules.

The above changes are reflected in the tables for the 2024 KPIs, in the column for period N-1. In addition, they are summarized in the tables below.



Data reported for 2023

KPI turnover	Activities	qualified, but incompatible	compatible
	7.1 Construction of new buildings	1,293,212	0
	7.7 Acquisition and ownership of buildings	211,466	17,139
	Total	1,504,678	17,139
KPI CapEx	6.5 Transport by motorbikes, passenger cars and light commercial vehicles	1,526	0
	7.7 Acquisition and ownership of buildings	121,142	117,525
	Total	122,668	117,525
KPI OpEx	6.5 Transport by motorbikes, passenger cars and light commercial vehicles	183	0
	7.1 Construction of new buildings	0	0
	7.2 Renovation of existing buildings	863	0
	7.7 Acquisition and ownership of buildings	404	0
	Total	1 450	0

Restated data for 2023

KPI turnover	Activities	qualified, but incompatible	compatible
	7.1 Construction of new buildings	1,314,097	0
	7.7 Acquisition and ownership of buildings	179,365	17,139
	Total	1,493,461	17,139
KPI CapEx	6.5 Transport by motorbikes, passenger cars and light commercial vehicles	1,526	0
	7.1 Construction of new buildings	0	12,118
	7.7 Acquisition and ownership of buildings	114,668	106,458
	Total	116,194	118,585
KPI OpEx	6.5 Transport by motorbikes, passenger cars and light commercial vehicles	409	0
	7.1 Construction of new buildings	0	0
	7.2 Renovation of existing buildings	0	0
	7.7 Acquisition and ownership of buildings	531	134
	Total	940	134



Percentage share of turnover from products or services related to economic activities aligned with the taxonomy

[illegible]



Explanations for tables regarding the share of turnover, capital expenditures, and operational expenditures aligned with the taxonomy

The code represents an abbreviation of the corresponding objective, for which an economic activity qualifies as making a significant contribution to its achievement, as well as the section number dedicated to the respective activity in the relevant annex related to the objective, namely:

- Climate change mitigation: **CCM**
- Climate change adaptation: **CCA**
- Water and marine resources: **WTR**
- Circular economy: **CE**
- Pollution prevention and control: **PPC**
- Biodiversity and ecosystems: **BIO**

**T** — Yes, an activity qualifying under the taxonomy and aligned with the taxonomy for the relevant environmental objective.

**N** — No, an activity qualifying under the taxonomy but not aligned with the taxonomy for the relevant environmental objective.

**N/EL** — Not eligible, an activity not qualifying under the taxonomy for the relevant environmental objective.

**EL** — An activity qualifying under the taxonomy for the relevant objective.

In accordance with the guidelines of Commission Delegated Regulation (EU) 2023/2486, the table below presents the scope of eligibility and alignment of turnover by environmental objectives. It includes compliance with each environmental objective for activities that make a significant contribution to multiple objectives:

Portion of turnover / Total turnover		
	Alignment with the taxonomy by objectives (%)	Eligibility for the taxonomy by objectives (%)
CCM	13.05	79.68
CCA	0	0
WTR	0	0
CE	0	0
PPC	0	0
BIO	0	0





Percentage share of capital expenditures (CapEx) from products or services related to economic activities aligned with the taxonomy

[illegible]



In accordance with the guidelines of Commission Delegated Regulation (EU) 2023/2486, the table below presents the scope of eligibility and alignment of capital expenditures (CapEx) by environmental objectives. It includes compliance with each environmental objective for activities that make a significant contribution to multiple objectives:

Portion of capital expenditures / Total capital expenditures (CapEx)		
	Alignment with the taxonomy by objectives (%)	Eligibility for the taxonomy by objectives (%)
CCM	24.14	69.94
CCA	0	0
WTR	0	0
CE	0	0
PPC	0	0
BIO	0	0





[illegible]



In accordance with the guidelines of Commission Delegated Regulation (EU) 2023/2486, the table below presents the scope of eligibility and alignment of operating expenditures (OpEx) by environmental objectives. It includes compliance with each environmental objective for activities that make a significant contribution to multiple objectives:

Portion of operating expenditures / Total operating expenditures (OpEx)		
	Alignment with the taxonomy by objectives (%)	Eligibility for the taxonomy by objectives (%)
CCM	0.08	88.80
CCA	0	0
WTR	0	0
CE	0	0
PPC	0	0
BIO	0	0





## Key performance indicators for nuclear and gaseous fossil fuel activities

Information on the extent to which the Echo Group's activities are related to nuclear energy and gaseous fossil fuels is disclosed in the tables below, in accordance with models 1-3 of Annex XII of Commission Delegated Regulation (EU) 2023/2486.

The following information is the same for the turnover, CapEx and OpEx indicators.

Nuclear energy activities		
1	The company conducts, finances or has exposure to the research, development, demonstration and deployment of innovative power generation facilities that produce energy through nuclear processes with minimal fuel cycle waste.	NO
2	The company constructs, finances or has exposure to the construction and safe operation of new nuclear facilities for the generation of electricity or process heat, including for district heating or industrial processes such as hydrogen production, as well as their safety upgrades using the best available technology.	NO
3	The company safely operates, finances or has exposure to existing nuclear facilities generating electricity or process heat, including for district heating or industrial processes such as hydrogen production from nuclear power.	NO
Natural gas activities		
4	The company constructs or operates facilities for the generation of electricity using gaseous fossil fuels, finances this activity or has exposure to it	NO
5	The company builds, modernises and operates combined heat/cooling and electricity generation facilities using gaseous fossil fuels, finances this activity or has exposure to it	NO
6	The company constructs, modernises and operates heat/cooling generation facilities using gaseous fossil fuels, finances or has exposure to these activities	NO



# 6

# Appendix



## ESRS Index — list of disclosure requirements

Scope	Disclosure	Page number
ESRS2	General disclosures	
	ESRS2 BP-1	6
	ESRS2 BP-2	8
	ESRS2 GOV-1	26, 46
	ESRS2 GOV-2	46, 47
	ESRS2 GOV-3	45
	ESRS2 GOV-4	48
	ESRS2 GOV-5	51
	ESRS2 SBM-1	9
	ESRS2 SBM-2	52
	ESRS2 SBM-3	57
	ESRS2 IRO-1	72
	ESRS2 IRO-2	80

Scope	Disclosure	Page number
Environmental ESRS E	Climate change	
	ESRS2 IRO-1	72, 78
	ESRS2 GOV-3	83
	ESRS2 SBM-3	83
	ESRS E1-1	83
	ESRS E1-2	83
	ESRS E1-3	86
	ESRS E1-4	90
	ESRS E1-5	91
	ESRS E1-6	93
	ESRS E1-7	Non material
	ESRS E1-8	Non material
	ESRS E1-9	Deferral
	Pollution	
	ESRS2 E2	Non material
	Water and marine resources	
	ESRS2 IRO-1	72, 78
	ESRS E3-1	99
	ESRS E3-2	99



Scope	Disclosure	Page number
	ESRS E3-3	101
	ESRS E3-4	102
	ESRS E3-5	Deferral
	Biodiversity and ecosystems	
	ESRS2 SBM-3	103
	ESRS2 IRO-1	72, 79
	ESRS E4-1	103
	ESRS E4-2	104
	ESRS E4-3	105
	ESRS E4-4	109
	ESRS E4-5	110
	ESRS E4-6	Deferral
	Resource use and circular economy	
	ESRS2 IRO-1	72, 79
	ESRS E5-1	111
	ESRS E5-2	112
	ESRS E5-3	116
	ESRS E5-4	Deferral
	ESRS E5-5	117
	ESRS E5-6	Deferral

Scope	Disclosure	Page number
Social ESRS S	Own employees	
	ESRS 2 SBM-2	121
	ESRS 2 SBM-3	121
	ESRS S1-1	122
	ESRS S1-2	125
	ESRS S1-3	128
	ESRS S1-4	128
	ESRS S1-5	130
	ESRS S1-6	132, 133
	ESRS S1-7	132, 134
	ESRS S1-8	Non material
	ESRS S1-9	135
	ESRS S1-10	144
	ESRS S1-11	Non material
	ESRS S1-12	Non material
	ESRS S1-13	136
	ESRS S1-14	Non material
	ESRS S1-15	139
	ESRS S1-16	141
	ESRS S1-17	144
	Employees in the value chain	
	ESRS 2 SBM-2	145
	ESRS 2 SBM-3	145



Scope	Disclosure	Page number
	ESRS S2-1	146
	ESRS S2-2	148
	ESRS S2-3	150
	ESRS S2-4	151
	ESRS S2-5	153
	Affected communities	
	ESRS 2 SBM-2	156
	ESRS 2 SBM-3	156
	ESRS S3-1	156
	ESRS S3-2	157
	ESRS S3-3	160
	ESRS S3-4	161
	ESRS S3-5	163
	Clients and end-users	
	ESRS 2 SBM-2	164
	ESRS 2 SBM-3	164
	ESRS S4-1	165
	ESRS S4-2	167
	ESRS S4-3	167
	ESRS S4-4	169
	ESRS S4-5	170

Scope	Disclosure	Page number
Governance ESRS G	Conducting business activities	
	ESRS 2 IRO-1	72, 81
	ESRS 2 GOV-1	172
	ESRS G1-1	173
	ESRS G1-2	178
	ESRS G1-3	180
	ESRS G1-4	184
	ESRS G1-5	184
	ESRS G1-6	187



## Index of datapoints resulting 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		41
ESRS 2 GOV-1 Percentage of board members who are independent, point 21 (e)			Annex II to Delegated Regulation (EU) 2020/1816		38
ESRS 2 GOV-4 Statement on due diligence, point 30	Indicator no. 10 of Table no. 3 of Annex I				48
ESRS 2 SBM-1 Participation in activities related to fossil fuel operations, point 40(d)(i)	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		25
ESRS 2 SBM-1 Involvement in activities related to chemical production point 40 (d) ii	Indicator no. 9 of Table no. 2 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816		25
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 (l) of Delegated Regulation (EU) 2020/181829, Annex II of Delegated Regulation (EU) 2020/1816		25



Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Page no. in this report
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) 2020/181829, Annex II of Delegated Regulation (EU) 2020/1816		25
ESRS E1-1 Transition plan to reach climate neutrality by 2050, point 14				Article 2 (1) of Regulation (EU) 2021/1119	83
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		Not applicable
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		90
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors point 38	Indicator no. 5 in Table 1 and indicator no. 5 in Table 2 of Annex I				92
ESRS E1-5 Energy consumption and mix, point 37	Indicator no. 5 in Table 1 of Annex I				92



Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Page no. in this report
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, points 40—43	Indicator no. 6 in Table 1 of Annex I				92
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions, point 44	Indicators 1 and 2 in Table 1 of Annex I	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 5 (1), Article 6 and Article 8 (1) of Delegated Regulation (EU) 2020/1818		94
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		94
ESRS E1-7 Greenhouse gas removal and carbon credits, point 56				Article 2 (1) of Regulation (EU) 2021/1119	Not applicable
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		Deferral



Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Page no. in this report
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			Deferral
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			Deferral
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, point 69			Annex II to Delegated Regulation (EU) 2020/1818		Deferral
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				Not applicable
ESRS E3-1 Water and marine resources, point 9	Indicator no. 7 in Table 2 of Annex I				99



Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Page no. in this report
ESRS E3-1 Dedicated policy, point 13	Indicator no. 8 in Table 2 of Annex I				99
ESRS E3-1 Sustainable oceans and seas point 14	Indicator no. 12 in Table 2 of Annex I				Not applicable
ESRS E3-4 Total water recycled and reused point 28 ( c)	Indicator no. 6.2 in Table 2 of Annex I				102
ESRS E3-4 Total water consumption in m3 per net revenue on own operations, point 29	Indicator no. 6.1 in Table 2 of Annex I				Not applicable
ESRS 2 SBM-3 E4 point 16 (a) i	Indicator no. 7 in Table 1 of Annex I				103
ESRS 2 SBM-3 E4 point 16 (b)	Indicator no. 10 in Table 2 of Annex I				103
ESRS 2 SBM-3 E4 point 16 ( c)	Indicator no. 14 in Table 2 of Annex I				103
ESRS E4-2 Sustainable land / agriculture practices or policies, point 24 (b)	Indicator no. 11 in Table 2 of Annex I				Not applicable
ESRS E4-2 Sustainable oceans / seas practices or policies, point 24 (c)	Indicator no. 12 in Table 2 of Annex I				Not applicable
ESRS E4-2 Policies to address deforestation, point 24 (d)	Indicator no. 15 in Table 2 of Annex I				Not applicable



Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Page no. in this report
ESRS E5-5 Non-recycled waste, point 37 (d)	Indicator no. 13 in Table 2 of Annex I				117
ESRS E5-5 Hazardous waste and radioactive waste, point 39	Indicator no. 9 in Table 1 in Annex I				118
ESRS 2 SBM-3-S1 Risk of incidents of forced labour, point 14 (f)	Indicator no. 13 in Table 3 of Annex I				121
ESRS 2 SBM-3-S1 Risk of incidents of forced labour, point 14 (g)	Indicator no. 12 in Table 3 in Annex I				121
ESRS S1-1 Human rights policy commitments, point 20	Indicator no. 9 in Table 3 and indicator no. 11 in Table 1 of Annex I				124
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, point 21			Annex II to Delegated Regulation (EU) 2020/1816		124
ESRS S1-1 Processes and measures for preventing trafficking in human beings, point 22	Indicator no. 11 in Table 3 of Annex I				124
ESRS S1-1 Workplace accident prevention policy or management system point 23	Indicator no. 1 in Table 3 of Annex I				Not applicable



Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Page no. in this report
ESRS S1-3 Grievance/complaints handling mechanisms point 32 ( c)	Indicator no. 5 in Table 3 of Annex I				128
ESRS S1-14 Number of fatalities and number and indicator of work-related accidents, point 88 (b) ( c)	Indicator no. 2 in Table 3 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816		Not applicable
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness, point 88 (e)	Indicator no. 3 in Table 3 of Annex I				Not applicable
ESRS S1-16 Unadjusted gender pay gap, point 97 (a)	Indicator no. 12 in Table 1 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816		141
ESRS S1-16 Excessive CEO pay ratio point 97 (b)	Indicator no. 8 in Table 3 in Annex I				143
ESRS S1-17 Incidents of discrimination, point 103 (a)	Indicator no. 7 in Table 3 of Annex I				144
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD, point 104 (a)	Indicator no. 10 in Table 1 and indicator no. 14 in Table 3 of Annex I		Annex II of Delegated Regulation (EU) 2020/1816, Article 12 (1) of Delegated Regulation (EU) 2020/1818		144
ESRS 2 SBM-3-S2 Significant risk of child labour or forced labour in the value chain, point 11 (b)	Indicators no. 12 and no. 13 in Table 3 of Annex I				145
ESRS S2-1 Human rights policy commitments, point 17	Indicator no. 9 in Table 3 and indicator no. 11 in Table 1 of Annex I				146



Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Page no. in this report
ESRS S2-1 Policies related to value chain workers, point 18	Indicator no. 11 and no. 4 in Table 3 of Annex I				146
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines point 19	Indicator no. 10 in Table 1 of Annex I		Annex II of Delegated Regulation (EU) 2020/1816, Article 12 (1) of Delegated Regulation (EU) 2020/1818		147
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, point 19			Annex II to Delegated Regulation (EU) 2020/1816		147
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain, point 36	Indicator no. 14 in Table 3 of Annex I				151
ESRS S3-1 Human rights policy commitments, point 16	Indicator no. 9 in Table 3 of Annex I and indicator no. 11 in Table 1 of Annex I				156
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines, point 17	Indicator no. 10 in Table 1 of Annex I		Annex II of Delegated Regulation (EU) 2020/1816, Article 12 (1) of Delegated Regulation (EU) 2020/1818		157
ESRS S3-4 Human rights issues and incidents, point 36	Indicator no. 14 in Table 3 of Annex I				161



Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Page no. in this report
ESRS S4-1 Policies related to consumers and endusers point 16	Indicator no. 9 in Table 3 and indicator no. 11 in Table 1 of Annex I				165
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines,point 17	Indicator no. 10 in Table 1 of Annex I		Annex II of Delegated Regulation (EU) 2020/1816, Article 12 (1) of Delegated Regulation (EU) 2020/1818		166
ESRS S4-4 Human rights issues and incidents, point 35	Indicator no. 14 in Table 3 of Annex I				169
ESRS G1-1 United Nations Convention against Corruption, point 10 (b)	Indicator no. 15 in Table 3 of Annex I				173
ESRS G1-1 Protection of whistleblowers,point 10 (d)	Indicator no. 6 in Table 3 of Annex I				177
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws, point 24 (a)	Indicator no. 17 in Table 3 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816		184
ESRS G1-4 Standards of anti-corruption and anti-bribery, point 24 (b)	Indicator no. 16 in Table 3 of Annex I				184



**Nicklas Lindberg**  
CEO

**Maciej Drozd**  
*Vice-President, CFO*

**Artur Langner**  
*Vice-President of the  
Management Board*

**Rafał Mazurczak**  
*Member of the  
Management Board*

**Małogrzata Turek**  
*Member of the  
Management Board*

Kielce, 26.03.2025



The document was signed  
with a qualified electronic  
signature



Please send all comments, suggestions  
and feedback to:



Anna Strożek

ESG Manager, Echo-Archicom Group

e-mail: [anna.strozek@echo.com.pl](mailto:anna.strozek@echo.com.pl)