Environmental, Social & Governance (ESG) Policy

Policy year 2026-27 · Effective 1 April 2026 to 31 March 2027 · Version 1.0 · Approved by the Management Board

Contents

1. 1. Purpose

InterAtlas Estate believes long-term value in real estate is created responsibly. This policy sets out our environmental, social and governance commitments.

2. 2. Environmental

- We prioritise listing developments with credible sustainability characteristics - energy-efficient design, certified construction standards and responsible resource use - and present developers' environmental credentials accurately.
- We operate digital-first to minimise our own footprint: paperless onboarding, electronic documents and remote processes by default.

3. 3. Social

- Fair treatment of clients: honest marketing, clearly labelled projections, and accessible complaint routes.

- Our services are offered in six languages so investors can decide in a language they fully understand.
- We respect labour rights across our supply chain (see our Modern Slavery & Human Trafficking Policy).
- Equal opportunity: we do not tolerate discrimination or harassment on any protected ground.

4. 4. Governance

Our governance framework - anti-bribery, anti-fraud, AML/CTF, data protection, sanctions compliance, tax principles and whistleblowing protection - is published openly on our Governance page and reviewed annually.

5. Developer and listing screening

- Environmental: we record available energy-performance and construction-standard certifications for each development and present them without exaggeration - claims we cannot verify are not published (no greenwashing).
- Social: developer labour-standards commitments are considered before listing (see Modern Slavery Policy).
- Governance: developers with unresolved integrity findings are not listed.

6. Our own footprint

- Digital-first operations: paperless onboarding and e-documents as default - printing is the exception.
- Remote-first client processes reduce travel; viewings are bundled where physical presence is needed.
- Suppliers with credible sustainability practices are preferred at equal cost and quality.

7. Measurement and reporting

ESG commitments are reviewed annually alongside this policy. We report progress honestly, including where we fall short, and set the following year's actions accordingly.

8. Governance and oversight

We operate three lines of defence. The first line is the business itself: every employee and manager owns the risks of their own activity and applies this policy in daily decisions. The second line is the compliance function, which designs the controls, advises the business, monitors adherence and reports independently. The third line is independent review - periodic internal audit work and, where engaged, external examination - which tests that the first two lines actually work. The Management Board sits above all three: it approves this policy, receives quarterly reporting on incidents, exceptions and control performance, and is escalated to within 24 hours for material events.

9. Risk assessment

Risk in this domain is assessed formally at least annually, and whenever our products, markets or the external environment change materially. Each identified risk is scored for likelihood and impact, assigned an owner and a mitigation with a deadline, and entered in the risk register reviewed quarterly by the Management Board. The factors below weigh most heavily in this policy's domain:

- Greenwashing claims by developers could flow into our listings if unverified.
- Construction supply chains carry environmental and labour exposures beyond our direct control.
- Energy intensity of marketing operations is modest but reputationally visible.
- ESG data quality from partners varies widely by market.

10. Procedures and controls

The operating procedures below are mandatory. Deviation requires prior written approval from the compliance function, recorded in the exceptions log with rationale and expiry.

- Listing intake records available energy and construction certifications; claims we cannot evidence are not published.
- Developer screening considers environmental sanctions, labour findings and stated commitments before first listing.
- Our operations default to paperless workflows; travel is bundled and remote-first.
- Supplier selection weighs credible sustainability practice at equal cost and quality.
- An annual ESG review sets measurable commitments, reports outcomes against last year honestly, and is published on the Governance page.

11. Application across our markets

Application across our markets: certification schemes differ by country; we name the scheme a developer actually holds rather than translating claims into unverifiable equivalents.

12. Applying this policy: worked examples

The examples below illustrate how the requirements of this policy operate in practice. They are illustrative, not exhaustive; where a real situation is not covered, the escalation duty applies.

- Situation: a developer describes a project as zero-carbon without certification. Response: the claim is not published; we request evidence and publish only what the certificate actually says.
- Situation: a shoot is proposed with international flights for content producible locally. Response: local sourcing preferred; travel is approved only where the output genuinely requires it.
- Situation: a partner's site receives an environmental fine. Response: screening review reopened, remediation discussed with deadlines; listings pause if the finding is unresolved.

13. Definitions

- ESG — environmental, social and governance factors used to evaluate responsible business conduct.
- Sustainability characteristics — verifiable features of a development such as energy performance certification or certified construction standards.
- Greenwashing — conveying a false or exaggerated impression of environmental benefit;

prohibited in all our communications.

14. Roles and responsibilities

- Management Board — owns this policy, approves it annually, sets the risk appetite and receives escalation of material issues within 24 hours of identification.
- Compliance function — maintains this policy, delivers training, performs monitoring, investigates concerns and reports quarterly to the Board on incidents, exceptions and control performance.
- Line managers — embed the policy in day-to-day operations, ensure their teams have completed training, and act as the first escalation point.
- All employees and associated persons — read and follow this policy, complete required training on joining and annually thereafter, and escalate concerns promptly rather than act on doubt.

15. Training and communication

Everyone in scope receives training on this policy at induction and at least annually, with targeted refreshers whenever the policy or the law changes materially. Completion is recorded. The current version of this policy is available to all staff and is published on the Governance page of atlasestate.estate; material changes are communicated directly.

- Induction: policy walkthrough within the first 10 working days, before unsupervised client contact.
- Annual refresher: scenario-based session covering the red flags and escalation routes in this document.
- Role-specific modules: deeper training for the functions most exposed to this policy's risks.
- Attestation: annual written confirmation of having read and understood the current version.

16. Records and retention

Records evidencing compliance with this policy - approvals, screenings, registers, training logs, investigation files - are kept accurately, stored securely with access restricted to those who need them, and retained for at least six years (or longer where law requires), after which they are securely destroyed.

17. Monitoring, audit and review

Compliance monitors adherence to this policy through periodic sample testing, exception reporting and review of escalations. Findings, together with any breaches and remediation actions, are reported to the Management Board quarterly. This policy is reviewed at least annually, and additionally whenever our operations, the law or regulatory guidance change materially.

- Quarterly: sample testing of controls and registers; exception-log review; Board reporting pack.
- Annually: full policy review against legal developments and incident learnings; training completion audit.
- Ad hoc: thematic reviews triggered by incidents, near misses or external findings.

18. Breaches and consequences

A breach of this policy is a serious matter. Confirmed breaches by employees are handled under our disciplinary process and may result in sanctions up to dismissal; breaches by suppliers, introducers or other associated persons may result in contract termination. Where conduct may amount to a criminal offence, we will cooperate fully with the competent authorities. Honest mistakes that are self-reported promptly are treated as learning opportunities, not misconduct - concealment, not error, is the aggravating factor.

19. Regulatory context and related documents

We design our controls by reference to internationally recognised frameworks and the local law of each market in which we operate. The frameworks most relevant to this policy include:

- UN Guiding Principles on Business and Human Rights
- EU consumer rules against misleading environmental claims
- Recognised building-certification schemes referenced by our developers

This policy forms part of the InterAtlas Estate governance framework and should be read together with the other policies published at atlasestate.estate/en/governance, including the Code of Conduct, the Whistleblowing Policy and the Data Protection Policy.

20. Version control

- Version 1.0 - 1 April 2026 - Initial adoption for policy year 2026-27 - Approved by the Management Board.
- Next scheduled review: March 2027 (or earlier upon material change in law or operations).
- Policy owner: Compliance function, compliance@atlasestate.estate.

Annex A - Contacts and escalation routes

- Compliance function: compliance@atlasestate.estate - policy questions, approvals, escalations and suspicion reports; acknowledgement within 1 business day.
- Whistleblowing routes: any route in the Whistleblowing Policy, including anonymous reporting; acknowledgement within 3 business days.
- Urgent matters (suspected live fraud, sanctions hit, data breach): escalate immediately by the fastest available channel, then confirm in writing the same day.
- External: nothing in this policy prevents any person from reporting directly to a competent authority at any time.