ESG Policy

Viga RE A/S

Adopted by the Board of Directors 9th of June 2026

1. Policy Purpose & Scope

The purpose of this ESG policy (the “Policy”) is to define the principles for integrating environmental, social and governance aspects in the organization of Viga RE A/S (Viga RE).

The Policy applies to all entities managed by Viga RE (“the Entities").

2. Governance

The Board of Directors of Viga RE is responsible for review of the Policy when necessary.

3. ESG Integration

It is the ambition of Viga RE to minimize negative impacts that its investment activities may have on environmental, social and governance factors. This is ensured by applying an integration approach whereby ESG issues are considered throughout the investment lifecycle of property acquisitions of Viga RE.

Viga RE participates in the GRESB real estate assessment, which serves as the main foundation for the approach of the organization to integrate ESG into its operations.

3.1. ESG Objectives

Viga RE has identified specific ESG issues as key priorities for the ongoing management of the organization and the Entities. These objectives are fully integrated in the overall business strategy as they act as primary reference for ESG integration efforts and internal processes of Viga RE. The ESG key priorities are reviewed annually in connection with the ESG report.

Environmental objectives concern reducing energy consumption, increasing the share of renewable energy used and limiting greenhouse gas emissions related to assets of the Entities. Further priorities include the reduction of risk from contaminated land, waste management, natural catastrophes/disasters, and use of water resources in asset operations.

Social objectives concern whether Viga RE and its partner organizations have sound stakeholder relations and uphold basic human rights including freedom of association, adequate labour standards/working conditions, as well as the abolition of child labour and compulsory labour.

Governance objectives concern that material risks are reduced among Viga RE and its partner organizations regarding bribery and corruption including risks of fraud and failure to fulfil the fiduciary duty. This also includes cybersecurity, data protection/privacy and ensuring disclosure of political contributions.

The ESG objectives of the Entities are defined as long-term objectives as these are continually reviewed during the asset holding period i.e., which is typically more than three years.

For further information on specific ESG policies of Viga RE, please refer to *Appendix A – ESG Focus Areas*.

3.2. Target-Setting

Viga RE supports the general ambition of the Paris Agreement to achieve net zero emissions in 2050.

To this end, the company has defined 2030 targets on greenhouse gas emissions, renewable energy share, energy consumption and data coverage on these indicators for the portfolio assets of Viga RE. In terms of reducing GHG emissions, Viga RE has an interim target for 2030 with a reduction of 50% of GHG emissions compared to a 2022 base year, and a net zero target for 2050.

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3.3. Asset Due Diligence

An ESG due diligence is performed prior to all potential acquisitions.

Each assessment follows a similar due diligence format, which integrates the ESG objectives and target-setting of Viga RE. In addition, the format considers sustainability risks and adverse impacts defined by the Regulation (EU) 2019/2088 ("SFDR"). This includes the Principal Adverse Sustainability Indicators applicable to investments in real estate assets as presented in Annex I to the Commission Delegated Regulation (EU) 2022/1288.

During the review of sustainability aspects, it is assessed whether risks related to each aspect could cause material negative impact to the value of the investment. It is also assessed whether the asset may itself cause adverse impacts on sustainability factors during the holding period.

Where material negative impacts are identified, these must either be mitigated and/or addressed in a subsequent plan for management and monitoring of the investment.

3.4. Partner Due Diligence

A partner due diligence is performed for all transaction counterparties and asset operators.

This includes an assessment of environmental, social and governance performance of such parties based on the criteria of the asset due diligence framework. As an additional step, the partner due diligence entails an assessment of good governance practices of partner entities. This includes the consideration of sound management structures, employee relations, remuneration of staff and tax compliance.

Based on the results of the partner due diligence, contractual protection may be sought to limit any ESG risks to the extent possible during the negotiation process.

Further, it is the ambition of Viga RE that all material risks identified as part of the partner due diligence process are resolved within an appropriate timeframe as may be agreed in collaboration with the partner entity.

3.5. Asset Management

A sustainability action plan is developed for all acquisitions to ensure active ownership.

The purpose of sustainability action plans is to integrate findings of the performed asset due diligence. This is done by defining specific tasks that reduce potentially identified negative impacts. Examples of such tasks may typically relate to the improvement of the asset's energy efficiency, access to renewable energy sources and the reduction of greenhouse gas emissions. Each task is linked to a distinct KPI to measure progress on the relevant issue.

During the holding period, asset performance related to the ESG action plan is monitored by the asset management team. These action plans are reviewed annually and may be subject to updates, where relevant.

Viga RE on an ongoing basis monitors controversies, misconduct, penalties, or accidents. As relevant, such cases will be externally communicated to relevant parties.

3.6. ESG Reporting

ESG performance of the portfolio is reported to the Board of Directors and investors of the Entities at least annually.

The intention of the annual ESG reporting is to monitor sustainability indicators used to measure any environmental and/or social characteristics promoted by the Entities as defined by the SFDR. Further, this reporting includes relevant Principal Adverse Impact Indicators of that Regulation to continually monitor sustainability performance.

The annual report of Viga RE shall include a dedicated ESG section, where the periodic sustainability performance of the entity is reviewed. The ESG report is based on the voluntary SME standard (VSME) and covers the disclosures required under the European Voluntary Sustainability Reporting Standard for non-listed SMEs. The VSME standard follows the overall structure of the European Sustainability Reporting Standards (ESRS), which are used in mandatory CSRD reporting, but in a more accessible and simplified format.

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Furthermore, following its commitments to annual GRESB reporting, Viga RE shall further publish annual sustainability disclosures subject to the reporting requirements of the GRESB guidelines.

For information on ESG actions and performance, please refer to the corporate website of Viga RE.

4. Fossil Fuel Exclusion

Viga RE will not undertake any investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels. Any properties that have dedicated infrastructure for the purpose of generating revenue from such activities will not be deemed to be investable.

5. Engagement

As investments are only made within real estate assets, Viga RE does not implement engagement policies in accordance with Article 3g of Directive 2007/36/EC. However, where it is found relevant, general engagement is made with tenants and third-party contractors to ensure implementation of the ESG Policy.

6. Allocation of Responsibility

6.1. Individuals Responsible for ESG

A Director of the Board of Viga RE is appointed as senior decision-maker accountable for ESG issues. This individual is involved in the process of defining the ESG objectives and approves strategic ESG decisions. The Director of the Board is thereby responsible for, among others, the following sustainability topics:

- Human rights
- Labour rights / decent work
- Environment including climate-related risks and opportunities
- Anti-corruption
- Health and well-being
- Diversity, equity and inclusion

With direct influence at the highest organizational level, the Director of the Board has access to relevant information in this regard. For further information on the objectives, please refer to *Appendix A – ESG Focus Areas*.

The Technical Director of Viga RE is appointed as the individual responsible for the implementation of objectives related to ESG, including the sustainability topics listed above.

6.2. ESG Committee

The ESG committee of Viga RE meets four times per year and has been established to discuss and monitor the implementation of the entity's ESG objectives.

The committee consists of the Director of the Board, Chief Financial Officer and Technical Director of Viga RE. The members of the ESG Committee may give one of the other members power of attorney to represent them at committee meetings.

6.3. Role of Management

In general, the management of Viga RE is collectively responsible for the implementation of procedures related to ESG, including issues on climate, environment, human rights and governance. This may be implemented by:

- Identifying ESG-related risks/opportunities and reporting material issues to the Board of Directors.
- Implementing the agreed-upon management measures
- Monitoring and reporting on ESG-related risks and opportunities
- Ensuring adequate resources, including staff, training and budget, are available to assess, implement and monitor ESG-related risks/opportunities and measures.

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7. Supporting Documentation

As supporting documentation to this ESG Policy, please find:

- ESG Integration Framework
- Environmental Management System

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Appendix A – ESG Focus Areas

As a responsible investor, it is engrained in the values of Viga RE to work to reduce the negative impacts of the company's operations with respect to the surrounding society. Based on the defined environmental, social and governance objectives of Viga RE, the company is dedicated to managing its efforts within its focus areas as defined through the following policies applied across the organization.

Environmental Polices

Energy Consumption: The consumption of energy is periodically monitored for the Entities and portfolio assets. Data on energy consumption are reported to investors, and development is reviewed against the target for energy consumption being defined by Viga RE. Where relevant, actions are taken to support this target.

Renewable Energy: Viga RE is committed to purchasing green energy from certified providers. Hence, renewable energy is used to supply the company office and common spaces of assets. Data on total energy consumption from renewable sources are reported to investors, and development is reviewed against the target for renewable energy consumption being defined by Viga RE. Where relevant, actions are taken to support this target.

Greenhouse Gas Emissions: Emissions of greenhouse gases ("GHG") are periodically monitored for the Entities and portfolio assets. Data on GHG emissions are reported to investors, and development is reviewed against the being target for GHG emissions defined by Viga RE. Where relevant, actions are taken to support this target.

Water Consumption: The consumption of water is periodically monitored for the Entities and portfolio assets. Data on water consumption are reported to investors, and development is reviewed against historical performance. Where materially negative trends on water consumption are identified, mitigating actions may be taken.

Contaminated Land: Upon acquisition of new portfolio assets, an assessment is made with respect to risk of land contamination. Where material risks are identified in this regard, financial dispositions and/or mitigating actions will be undertaken to adequately cater to these considerations.

Climate risks: Upon acquisition of new portfolio assets, an assessment is made with respect to risk of flooding, sea water rise, and groundwater. Further, these risk assessments are updated on an ongoing basis for standing investments at least every three years. Where material risks are identified in this regard, financial dispositions and/or mitigating actions will be undertaken to adequately cater to these considerations.

Social Polices

Stakeholder Relations: Upon acquisition of new portfolio assets, or when engaging in material procurements, an assessment is performed for transaction counterparties with respect to their general stakeholder relations. Further, such assessments are performed on an ongoing basis for asset operators at least every three years. Where material risks are identified in this regard, contractual protection may be sought to limit such risks.

Human Rights: Upon acquisition of new portfolio assets, or when engaging in material procurements, an assessment is performed for transaction counterparties with respect to their efforts to uphold human rights. Further, such assessments are performed on an ongoing basis for asset operators at least every three years. Where material risks are identified in this regard, contractual protection may be sought to limit such risks.

Freedom of Association: Upon acquisition of new portfolio assets, or when engaging in material procurements, an assessment is performed for transaction counterparties with respect to their efforts to uphold freedom of association. Further, such assessments are performed on an ongoing basis for asset operators at least every three years. Where material risks are identified in this regard, contractual protection may be sought to limit such risks.

Labour Standards and Working Conditions: Upon acquisition of new portfolio assets, or when engaging in material procurements, an assessment is performed for transaction counterparties with respect to their efforts to uphold adequate labour standards and working conditions. Further, such assessments are performed on an ongoing basis for asset operators at least every three years. Where material risks are identified in this regard, contractual protection may be sought to limit such risks.

Child Labour: Upon acquisition of new portfolio assets, or when engaging in material procurements, an assessment is performed for transaction counterparties with respect to the risk of exposure to child labour. Further, such assessments are performed on an ongoing basis for asset operators at least every three years. Where material risks are identified in this regard, contractual protection may be sought to limit such risks.

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Compulsory Labour: Upon acquisition of new portfolio assets, or when engaging in material procurements, an assessment is performed for transaction counterparties with respect to the risk of exposure to compulsory labour. Further, such assessments are performed on an ongoing basis for asset operators at least every three years. Where material risks are identified in this regard, contractual protection may be sought to limit such risks.

Health and Well-Being: Viga RE aims to promote health and well-being of individuals employed within the organization. In this regard, the company has established a health and well-being program, which includes an annual assessment of the mental, physical and social health and well-being of employees. Where relevant, Viga RE will set goals and define action plans to implement measures that address potential issues raised.

Diversity, Equity and Inclusion: Viga RE aims to work with human capital through promoting diversity, equity and inclusion of individuals employed within the organization. This is done by acknowledging the value of a diverse workplace and having a non-tolerance policy against discrimination e.g., based on gender, age, race, religion, disability and/or sexual orientation. Furthermore, Viga RE employees are continually trained in, among other ESG issues, how to enhance diversity, equity, and inclusion.

Customer satisfaction: Viga RE carries out annual customer satisfaction surveys for the tenants in the assets in order to ensure a high degree of satisfaction with the physical assets as well as the service provided. Health and safety issues and priorities for the tenants are part of the customer satisfaction survey.

Governance Policies

Bribery and corruption: Upon acquisition of new portfolio assets, or when engaging in material procurements, an assessment is performed for transaction counterparties with respect to the risk of exposure to bribery and corruption. Further, such assessments are performed on an ongoing basis for asset operators at least every three years. Where material risks are identified in this regard, contractual protection may be sought to limit such risks.

Fraud: Upon acquisition of new portfolio assets, or when engaging in material procurements, an assessment is performed for transaction counterparties with respect to the risk of exposure to fraud. Further, such assessments are performed on an ongoing basis for asset operators at least every three years. Where material risks are identified in this regard, contractual protection may be sought to limit such risks.

Fiduciary Duty: Upon acquisition of new portfolio assets, or when engaging in material procurements, an assessment is performed for transaction counterparties with respect to the risk of exposure to past behaviour related to potential fiduciary duties of the party. Further, such assessments are performed on an ongoing basis for asset operators at least every three years. Where material risks are identified in this regard, contractual protection may be sought to limit such risks.

Cybersecurity: Upon acquisition of new portfolio assets, or when engaging in material procurements, an assessment is performed for transaction counterparties with respect to their efforts to ensure cybersecurity. Further, such assessments are performed on an ongoing basis for asset operators at least every three years. Where material risks are identified in this regard, contractual protection may be sought to limit such risks.

Data Protection and Privacy: Upon acquisition of new portfolio assets, or when engaging in material procurements, an assessment is performed for transaction counterparties with respect to their efforts to ensure data protection and privacy. Further, such assessments are performed on an ongoing basis for asset operators at least every three years. Where material risks are identified in this regard, contractual protection may be sought to limit such risks.

Political Contributions: Upon acquisition of new portfolio assets, or when engaging in material procurements, an assessment is performed for transaction counterparties with respect to risks linked to political contributions. Further, such assessments are performed on an ongoing basis for asset operators at least every three years. Where material risks are identified in this regard, contractual protection may be sought to limit such risks.

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