



DL
INVEST
GROUP

*Every investment is
a new challenge...*

ESG REPORT

DL INVEST GROUP
for 2022

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Dear Sirs,

We are pleased to present our second ESG report, in which we would like to show our approach and actions in the field of environmental, social and corporate governance factors that affect our business, stakeholders and the environment.

As a leader in the commercial real estate market, we are aware of our responsibility to contribute to sustainable economic, social and environmental development. Therefore, in our strategy for 2021-2025, we included ESG as one of the key pillars of our mission, vision and values. Our goal is not only to provide high-quality services and products in the field of real estate development and management in the warehouse, mixed-use and commercial segments, but also to build trust and loyalty of our clients, employees, shareholders and business partners, as well as to care for the natural environment and society in which we operate.

In this report, we present our business model and how we create value for our stakeholders, as well as our ESG governance framework and structures. We also describe our main ESG policies and principles, as well as our activities and initiatives related to specific ESG factors. We also present our ESG results and goals, which are consistent with international standards and initiatives such as the 2030 Agenda, the Paris Agreement and the TCFD Framework.

The scope of this report covers our activities in Poland in 2022. The data and information contained in the report come from our systems and internal reports, as well as from research and surveys conducted among our stakeholders. The report was prepared in accordance with sustainable development standards.

We invite you to read our ESG report and share your opinions and suggestions with us. We are open to dialogue and cooperation with our stakeholders to continuously improve our ESG activities and reporting.

Kind regards, Chairman
of the Supervisory Board
Dominik Leszczyński



ESG report

ESG values in the DL Invest Group business model

02

DL Invest Group is one of the fastest growing developers and investors in Poland. We have been operating on the commercial real estate market for over 17 years. The Group's business model assumes full implementation of the investment process based on the internal structure of the group, followed by active project management as a long-term owner. We offer our clients high-quality surfaces, not only at the time of commissioning, but also throughout the entire period of use. Our approach is based on the ability to respond flexibly to the needs of tenants.

Many years of experience and competence are confirmed by a diversified real estate portfolio that maintains almost full rental levels. This is possible by maintaining

the property in the highest quality, flexible response to tenants' needs and providing the highest quality services based on a unique management model.

The key aspects of our business model are:

- **Top quality facilities**

It is in our interest that the facility is constructed to the highest quality, as it will be used by us as owners, under lease, for a period of over 20 years. Among other things, in order to eliminate additional costs during the use of the facility and problems that may arise on the part of the Tenant due to snags and interruptions in business, we pay special attention to the quality of implementation and management of the facility.



- **A flexible approach to tenant expectations**

Thanks to this, we strive to extend and renew the contract, which is the primary goal and thus a guarantee for the Tenant regarding the quality of service. The above is confirmed by completed facilities with a total value of over PLN 3 billion with a 97% occupancy rate.

As the owner, we bear **full responsibility** for the impact of the project, including, for example, social conflicts or communication problems, bringing this type of problem to the tenant.

It is the DL Invest Group business model that guarantees quality based on a long-term relationship with the tenant, due to several decades of project amortization, which requires us to constantly increase the value of the project and maintain long-term relationships, meeting the tenant's expectations in terms of changing requirements for change, e.g. arrangement or enlarging or reducing the area. Only this business model guarantees the quality of use of the space throughout the entire lease period.

The impact of the environmental and social situation

ESG in a broad sense is a concept that primarily focuses on environmental, social and management issues, therefore for DL Invest Group it is a key point of reference in contemporary functioning on the Polish market, and in the era of growing social awareness, it is not only a trend, but also a necessity in the business strategy that we want to gradually implement and develop in the coming years.

Investors and financial institutions use these criteria to assess not only our company's liability, but also future operational risk. Due to the fact that ESG is an extension of the concept of CSR (corporate social responsibility), it provides us with a set of factors that allow us to monitor the effects of our activities, especially in terms of non-financial aspects.

It is worth emphasizing that ESG has, year by year, an increasingly real and measurable impact on the development of our business.



DL TOWER - Katowice

Referring in turn to climate change as a process affecting our planet, including long-term transformations of climate elements lasting for many years. At DL Invest Group, we realize that these changes may result from both natural processes and extreme weather phenomena, such as:

Global warming: we are observing an increase in the average temperature of the earth's surface and oceans, which is an indisputable phenomenon resulting from human activity and natural processes.

Melting ice: Melting glaciers and ice sheets have a significant impact on sea and ocean levels, and therefore also on polar ecosystems.

Changes in rainfall: in some regions, changes in rainfall are observed, which causes areas to diversify into drier and rainier areas.

Extreme weather events: Rising surface temperatures affect the frequency of hurricanes, droughts and floods.

Rising sea levels: Melting glaciers and expanding ocean waters are causing sea levels to rise. This in turn threatens coastlines and islands.

At DL Invest Group, we believe that climate change has a real impact on our lives and the environment. Therefore, one of the key elements of everyday work is taking actions to protect the climate and sustainable development.

In 2022, there were also important social and programmatic changes in Poland that affected various social groups. Here are some of these changes:

- **Family Care Capital (RKO):** A new family support mechanism has been introduced, which aims to help Polish families with small children.
- **Subsidy for childcare:** From April 1, 2022, funds were launched to co-finance fees for a nursery, children's club and day care provider.
- **Zero PIT for families 4+:** Families with at least four children, with income up to PLN 85,528, do not pay income tax (PIT). In the case of both parents, this amount is PLN 171,056.
- **Tax-free pension:** Pensioners receiving benefits of up to PLN 2,500 per month do not pay income tax. People with higher benefits will pay tax only on the amount exceeding PLN 2.5 thousand. This is a change that affects approximately 2/3 of retirees in Poland.



The changes had a significant impact on the lives of our employees and their families, elderly and disabled people in Poland in 2022.

Vision of changes

The modern commercial real estate market is dynamic and requires adaptation to changing conditions. Below we present several visions of changes that, in our opinion, may contribute to the success of DL Invest Group:

- 1. Sustainable development:** this is the first and key point on the list of changes we plan for the coming years. This means nothing other than increasing the scope of care for the natural environment, local community and long-term benefits. Investing in environmentally friendly real estate, promoting energy-saving solutions and supporting local initiatives are steps we plan to expand in the coming years.
- 2. New technologies:** We want to automate many processes in our company, such as virtual visualizations, property management tools and platforms for cooperation with clients and subcontractors. This is a scope that will significantly affect the quality of work within the DL Invest Group.

3. Personalization of services: Customers expect personalized solutions. Our company wants to invest in better communication with customers, adapting the offer to their needs and providing additional services, such as interior design consultancy to improve the well-being of employees or optimize media consumption in everyday use.

4. Online development: This is an area that we are constantly improving and working on as a tool for even better communication with third parties. DL Invest Group strives to develop its online presence by modernizing its website, social media, advertising campaigns and advertising platforms. This will allow us to reach a larger audience.

5. Employee education: Investing in employee development is a key element of success for DL Invest Group. Training, courses, internships and motivational programs help develop and shape talented specialists and improve the quality of services.

Visions of changes for the coming years will be verified by us and adjusted every year to the current situation and current needs.





Stakeholders

Stakeholders in the activities of DL Invest Group

In today's complex world, our business activities are not limited to buying, selling and renting buildings. This dynamic field covers a wide spectrum of stakeholders who influence the functioning and development of the real estate sector. We are in constant contact with these entities, while maintaining transparency of communication in accordance with our policies implemented in the company.

For DL Invest Group, the main stakeholder groups with whom we create the future together are:

1. Tenants: people or companies from many industries such as financial, legal, logistics, production or others providing services to third parties who rent the

property for a specified period of time. Their needs, expectations and lease conditions have a direct impact on our business and the quality and profitability of real estate. The DL Welcome platform was implemented especially for this group, improving the quality of contact and streamlining the flow of information.

2. Investors/Financing banks: Investors as individuals, funds, corporations or financial institutions that invest in real estate. Banks and lending institutions provide financing for the purchase or construction of commercial facilities. Their lending policies, interest rates and loan terms impact the availability of capital for both us and our tenants. Contact with these entities has a significant impact on the further development of the ESG strategy in terms of allocating funds to sustainable projects.



ESG Strategy

ESG strategies implemented every year are a key tool for us that helps us achieve our social responsibility and environmental protection goals. Our strategy for the coming years is primarily:

- 3. DL Invest Group employees:** specialists dealing with real estate management, including administration, maintenance, marketing and customer service. Their competences and commitment influence the quality of services and customer satisfaction. With them in mind, we have created the dl news platform, which gives the opportunity to influence the direction of our company's development and provides current information on the current situation.
- 4. External advisors:** experts in law, finance, architecture or engineering who support stakeholders in making decisions regarding real estate. Their knowledge and recommendations are valuable for the success of projects. The daily flow of information with external advisors allows you to obtain an objective view of a given project and influences further decision-making.

- 5. Business partners:** Companies cooperating with DL Invest Group as contractors, subcontractors, suppliers of materials and services, the quality and professionalism of which affect the image of our company, which is why we pay special attention to open and transparent communication with this group and provide standards and policies applicable in our structures.
- 6. Society:** The general public, including the local community, neighboring residents and non-governmental organizations. Their opinions, needs and expectations influence the acceptance and direction of development of our projects. We try to provide this group with comprehensive information about the advantages and risks of a given project and carefully analyze the feedback.



7. Social Media: In the digital age, social media is playing an increasingly important role in communicating and promoting business activities. Their influence on public opinion and image is invaluable. Therefore, we have established a special unit in the form of the Communication Department dedicated to servicing these entities.



03

ESG report

Assumptions of environmental changes for the next 5 years

5-year plan – assumptions and status of implemented changes

In 2022, we introduced a 5-year plan for changes in the impact on the environment and surroundings at DL Invest Group, which is updated every year. The key assumptions of this plan are presented below.

Reducing utility consumption

Replacing lighting with modern, energy-saving LEDs is becoming an important element of utility consumption in modern construction.

In order to reduce water consumption in tenants' premises where possible (e.g. in gyms), we have introduced a so-called grey water cycle. This concept makes a significant contribution to reducing consumption, especially in areas where the amount of water used is significant.

Reducing material consumption

Because we attach great importance to ecological solutions, we have implemented an electronic invoice circulation system in our office spaces. This solution will significantly reduce the consumption of this valuable material, which is paper.



Due to the multitude of DL Invest Group investments, changing the lighting in all facilities will significantly contribute to reducing energy consumption.

Keep in mind that:

- tradycyjna żarówka zużywa dziennie 2 400W,
- żarówka energooszczędna o mocy 440W,
- podczas gdy żarówka LED zużywa jedynie 320W.

Taking the above into account, we believe that by the end of 2023, all our facilities will be equipped exclusively with LED lighting.

The full circulation of electronic invoices will be implemented in 2022.

Additionally, our employees, being highly ecologically aware, do not produce large amounts of plastic bottles during their work. For the sake of both employee health and ecology, we use filtered water from a distributor. This contributes significantly to reducing the amount of plastic produced.

We certify our buildings in the BREEAM system

Our buildings are BREEAM certified, which allows us to show our tenants, clients and business partners that our buildings meet the highest standards.

Today, having the BREEAM certificate is a confirmation that our buildings are characterized by lower maintenance costs, we have significantly reduced their impact on the environment, and we care about environmental aspects in every detail. DL PIANO posiada obecnie certyfikat BREEAM In-Use na poziomie Excellent.

By the end of 2022, DL TOWER, DL PRIME, DL Invest Park Czechowice-Dziedzice and DL Invest Park Psary have also obtained the BREEAM certificate at the Excellent and Very Good levels.

Photovoltaic installations on our commercial, logistics, office buildings and green areas.

We have started implementing photovoltaic installations on our facilities.

We are able to build photovoltaic installations on

The DL Invest Group plans to implement waste segregation in front of its retail parks, encountering difficulties in its implementation, but prioritizing care for the environment. Waste segregation will be implemented in 2022.

Chargers for electric cars

The DL Invest Group, bearing in mind the extremely important problem of air pollution caused by motor vehicles, wants to contribute to reducing emissions. It planned to install electric chargers in shopping malls to support the development of electromobility in Poland and thus reduce emissions of pollutants into the atmosphere.

This is intended both for the convenience of customers using our facilities and to send a signal to customers that the environment is extremely important to DL Invest Group.

Replacing part of the fleet with electric cars

For the sake of the environment, some company cars will be replaced with electric cars. It is planned to replace several cars in 2022-2025.



approximately 30 of our facilities.

The first photovoltaic installations will generate energy from the sun in 2022/2023.

Introduction of full waste segregation

Waste segregation in offices is not a problem these days. The challenge is to introduce waste segregation in front of commercial facilities due to the high customer traffic and the varying level of ecological awareness of people visiting these facilities.

Each replacement of a car with an electric one will also contribute to reducing CO2 emissions into the atmosphere. Every move of DL Invest Group is proof of our pro-ecological attitude.

Introducing additional environmental measures

Over the next two years, we plan to introduce additional ecological solutions in our facilities, such as:

- rainwater tanks for irrigating the vegetation around the facility,

- composters for the management of BIO waste generated around our facilities, mainly cut grass, branches and leaves
- houses for hedgehogs
- ird houses

ISO 14001:2015

DL Invest Group received a positive assessment after an environmental audit conducted by an external entity specializing in ISO 14001:2015 environmental certification.

The ISO 14001:2015 certificate was obtained by April 2022.

Assumptions for 2023

In accordance with the 5-year plan described above, the key implementations in 2023 will include primarily the continuation of certification of current and ongoing investments, we have prepared a schedule assuming the certification of the following facilities:

By the end of 2023, DL Invest Park Teresin, DL Invest Park Legnica, DL Invest Park Kluczbork, DL Invest Park Elbląg, DL Invest Park Płock will receive the BREEAM In-Use certificate.

In total, by the end of 2023, we plan to obtain BREEAM certification for 10 of our facilities.

Another key element for us is the implementation of photovoltaic panels on existing facilities. The first photovoltaic installations will generate energy from the sun already in 2022/2023 in accordance with the adopted assumptions.

- The implementation of all photovoltaic installations could generate a maximum of over 45 MW
- We have power of up to over 35 MW on the roofs of buildings.
- It will be possible to install photovoltaic panels with a capacity of approximately 9.8 MW in green areas. This is a huge bank of green energy that will flow directly to our facilities, which will also effectively reduce the carbon footprint.



- The process of implementing photovoltaic installations will take place gradually over the next 5 years.
- After installing photovoltaic installations, the carbon footprint will be neutralized to over 17,000,000 kg/year.

Installation of chargers for electric cars - this process has already started in office buildings and by the end of 2024 it is also expected to cover warehouse and commercial facilities. This scope is carried out in cooperation with tenants who, like DL Invest Group, limit gas emissions into the atmosphere.

We also plan to introduce additional environmental protection measures. Over the next two years, we also plan to introduce additional ecological solutions in our facilities, such as:

- rainwater tanks for irrigating the vegetation around the facility,
- composters for the management of BIO waste generated around our facilities, mainly cut grass, branches and leaves

- houses for hedgehogs
- bird houses

Improving the currently implemented policies with additional scope regarding occupational health and safety, which will increase the comfort of our employees. The last but equally important element for our company is preparation for the implementation of ISO in the scope, the implementation plan covers the years 2023-2024:

- 9001
- 50001
- 45001

We believe that these policies will have a positive impact on the corporate governance of DL Invest Group.



ESG report

DL Enviromental

04

Due to the changing environmental, political, social and technological conditions, the market standard when implementing new investments in the commercial real estate market is to balance economic and natural aspects important for the context of the place where such investments are made.

As part of **DL Invest Group**, we have implemented the DL Green policy, which responds to the current needs and expectations of all stakeholder groups important for the implementation of logistics projects: regulators, tenants, local communities and, very importantly, it assumes the implementation of the Group's projects with the highest possible respect for the natural environment. As part of it, we implement, among others, ecological initiatives that involve the creation of habitats for plants and animals and the organization of initiatives promoting ecological attitudes among local communities.

Climate change mitigation and adaptation

Mitigating climate change and adapting to its effects are key challenges for **DL Invest Group** in the coming years, which is why we have adopted directions of action related to this, divided into scopes as below.

Mitigating climate change:

- **Energy efficiency:** we have undertaken a preparatory process to design facilities with low energy consumption, and the implementation itself uses energy-saving technologies, such as solar panels, thermal insulation and efficient heating systems, thanks to which we will contribute to reducing greenhouse gas emissions.
- **Green roofs and facades:** we prepare commer-

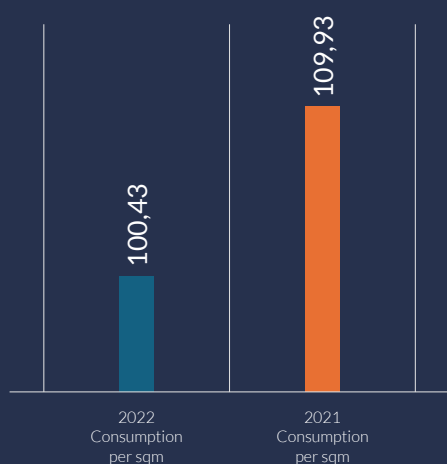
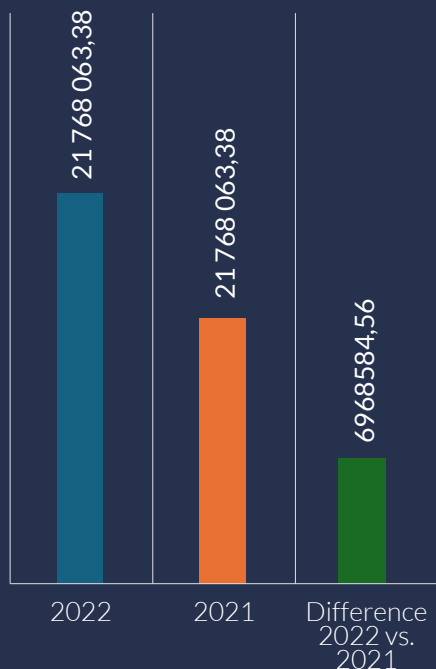
cial real estate projects with green roofs and facades as options for clients, which will contribute to the absorption of carbon dioxide and improve air quality.

- **Sustainable materials:** Choosing materials with a low environmental impact, such as FSC-certified wood or recycled materials, is important to reduce your carbon footprint.
- **Transport:** the locations of our commercial facilities, regardless of the segment, take into account the proximity of public transport and infrastructure for cyclists and pedestrians, which is often additionally implemented by DL Invest Group within the scope of impact on the immediate surroundings. In logistics facilities, we make every effort to create public transport transfer points next to them, as was the case at DL Invest Park Psary.

Adaptation to climate change:

- **Flood risk management:** all facilities implemented by DL Invest Group are also designed in such a way as to minimize the risk of flooding. Land that is selected for specific projects also undergoes a geological survey to determine the real risk and prepare a plan to reduce it to a minimum.
- **Resistance to heat:** DL Invest Group facilities are designed to a standard that ensures appropriate air conditioning systems in office and commercial spaces as well as thermal insulation that helps limit the heating of rooms as a result of climate change causing increased temperatures in summer.
- **Sustainable infrastructure:** in accordance with the adopted DL Green policy, our facilities are equipped with points dedicated to the local community, such as an outdoor gym and a basketball court - implemented at DL Piano, a barbecue area - DL Invest Park Psary,

Electricity consumption (kWh)



As indicated in the table above the electricity consumption per square meter in year 2022 is lower than in 2021, this is mainly due to the fact that we have implemented new solutions as mentioned earlier in the newest developments and we have improved installations in the existing buildings. Year 2021 was calculated for the 24 facilities while in 2022 the number of projects implemented was increased to 31.

Investing in green and blue infrastructure, such as parks, squares or rainwater treatment plants, can help adapt cities to climate change.

Social awareness: our goal is primarily to educate our stakeholders about climate change and the benefits of sustainable practices, for this purpose we publish on our website www.dlinvest.pl in the DL Green tab all the necessary information about our policy-related activities DL Green.

DL Energy

In this chapter, we will look at how our company manages energy consumption, what actions it takes to reduce greenhouse gas emissions, and how it benefits our business.

DL Invest Group by way of creating the Facility Management Department, monitors energy consumption in facilities implemented by our company. Energy consumption over the years will be subject to energy audits planned for the following years and will also be diversified in terms of the type of energy consumed. We strive to ensure that suppliers now partially provide energy from renewable sources, as shown in the table below. Monitoring energy consumption is aimed primarily at preparing a reduction plan for existing facilities and an optimization plan for facilities under construction.

Energy consumption is a key aspect that affects the environment, operating costs and company image. Through appropriate energy management, we want to contribute to reducing CO2 emissions, financial savings and increasing competitiveness compared to other entities.

Year of analysis:	2021	2022
Number of objects		
Total energy consumption	14191303,82	15994768
Share of renewable energy of total consumption	40,22%	40,22%

Pollution and waste

In March 2022, DL Invest Group obtained the ISO 14001:2015 certificate (Environmental Management System) and based on it, we have prepared the Waste Management Policy. In accordance with the above-men-

tioned policy, a waste management scheme was created, the key elements of which are described below. It is worth mentioning here that due to the different locations of our investments, procedures adapted to a given commune apply.

When organizing waste collection in a given commune, you should first analyze the provisions of the regulations on maintaining cleanliness and order in the commune in which DL Invest Group owns a property.

If, as part of its resolution, the Commune took over the obligation to collect waste from uninhabited properties (enterprises), then it selected a collection company as part of the tender procedure and the task of DL Invest Group is to submit a declaration on waste collection to the given City Hall.

After submitting the declaration, we pay fees for waste collection from a given commune.

If the Commune has not taken over the obligation to manage waste in the Commune, which is the case in most cases, each uninhabited property must conclude an individual commercial contract with a waste collection company.

In order to select a waste collection company, companies

operating in a given area should be analyzed in terms of appropriate decisions on waste transport, entries in the BDO and the necessary entry into regulated activities in a given commune.

Each commune publishes on its website a list of entities that may legally collect waste in their area. These companies have been verified and have the appropriate decisions enabling them to properly service the property in terms of waste collection.

From the above list, we select the company with which we conclude the contract.

We conclude contracts for waste collection and management for the following 5 waste fractions:

15 01 01 - Paper and cardboard packaging

15 01 02 - Plastic packaging

15 01 07 - Glass packaging

20 02 01 - Biodegradable waste

20 03 01 - Unsegregated (mixed) municipal waste

The collection of all 5 waste fractions guarantees waste treatment in accordance with the Waste Act, the Act on maintaining cleanliness and order in municipalities, regulations adopted by the given municipalities and the



adopted high ecological standards followed by DL Invest Group.

Water resources

Similarly to energy consumption, DL Invest Group monitors the annual water consumption at our facilities in units of m³/sq m/year. Verification of the consumption of this parameter allows us to precisely prepare subsequent projects, taking into account solutions that reduce consumption to the actual demand, divided into running water and recycled water. The solutions are also implemented in existing facilities as part of the work carried out by the Revitalization Department.

We are currently implementing solutions such as gray water recycling, where necessary, we have implemented separators/filters to minimize the risk of impact on the aquatic environment, further steps include replacing bathroom fittings in toilets, water-saving washbasin taps with reduced flow and temporary closure, cisterns with reduced flow - water savings of approximately 50%, implementation of a water leak detection system (based on load measurement), use of rainwater from roofs accumulating in retention tanks to irrigate green areas,

use of appropriate, diversified irrigation systems adapted to the type of vegetation.

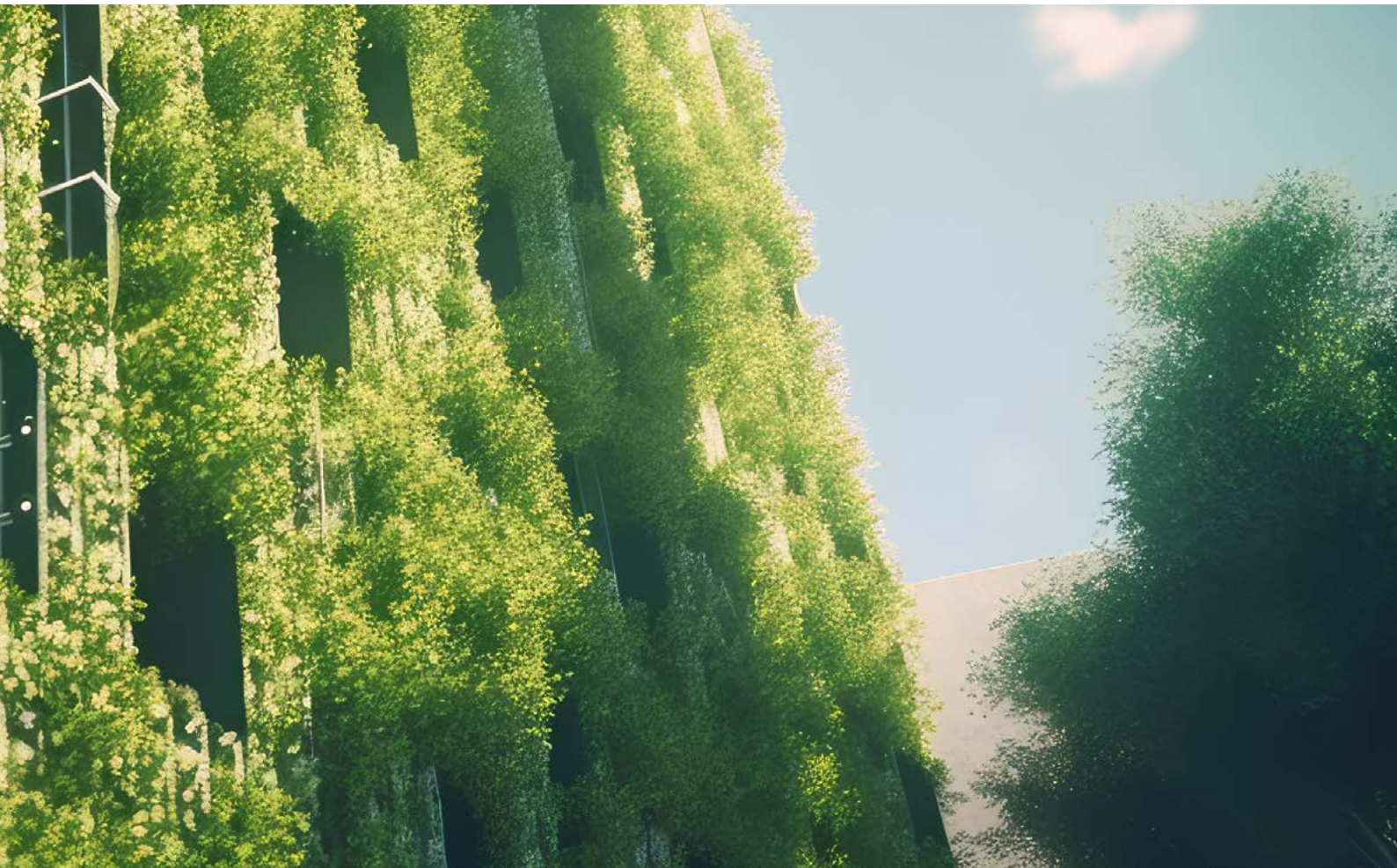
By applying the above improvements, we aim to reduce water consumption compared to a third-party benchmark. Detailed data in this regard will be published in the report for 2023 after the implementation of the design solutions.

Biodiversity and ecosystems

DL Invest Group has implemented a transformation plan for biodiversity and ecosystems, which covers the following areas.

Protecting biodiversity is important to us in terms of sustainable development. Our company monitors its activities in the context of its impact on biodiversity, both positive and negative. Ecosystem management is key to protecting biodiversity, providing ecosystem services (e.g. pollination, air purification, climate regulation) and minimizing negative impacts on the environment.

In order to protect animal species occurring in the locations of our investments, we build safe passages for animals (such as the tunnel under the expressway in DL



Invest Park Psary), houses for insects, houses for birds, we also provide meadows in our projects for the location of hives for bees.

We have implemented a waste management policy to minimize the risk of hazardous materials and pollutants entering the environment and minimize the impact of our projects on biodiversity. This policy also includes the use of recycled materials, and since we implement projects based on the ISO 14001 standard, our tenants also operate based on this standard.

Before starting the project, detailed analyzes of the area are carried out to verify the species present there, how they are protected and to assess the risk of the project's impact during construction and after its completion on the ecosystem and its diversity. In many locations, we fertilize with humus and plant trees and shrubs. In locations where protected species occur, our transformation plan provides for the creation of protective areas.

Below is a diagram of the project preparation process.

LAND CHECK

Before starting each new investment, DL Invest Group, based on external entities and the internal structure, assesses whether the area intended for development is

inhabited by protected animals or plants, whether in the case of the presence of such protected species, the land will not be used for further development and in accordance with the conditional preliminary agreement, the Company may withdraw from the transaction.

QUALITY ASSESSMENT

The second step is to check the land for possible contamination and the possibility of recultivation. If it is not possible to restore the land to its proper condition, **DL INVEST GROUP** withdraws from the takeover.

IMPACT

The next step is based on social due diligence and includes checking the neighboring housing estates and the impact of the investment on them, as well as any possibilities to reduce this impact.



VALUE ADD

The next step is to assess how **DL Invest Group** can improve the location to make it more environmentally and socially friendly. All costs are estimated at each stage of development and included in the budget and investment schedule.

RISKS

After preparing the location analysis, the potential risks associated with implementing or not implementing potential solutions are also verified. Neglecting the protection of biodiversity and ecosystems can lead to financial losses, e.g. due to conflicts with local communities or sanctions from regulatory authorities. Negative actions towards the environment can also damage the company's reputation and affect its relationships with stakeholders.

Resource use and circular economy

The circular economy (circular economy) is an operating model for DL Invest Group that focuses on sustainable development and environmental protection. It is moving from a traditional economy that generates masses of waste and destroys natural resources, to a model that promotes efficiency, recycling and minimizing waste.

In practice, this means reducing waste to a minimum, which is something we strive for more and more every year. We also believe that by implementing circular economy, our actions are beneficial both for the environment and economic development, creating new jobs and stimulating innovation.

In our company, both in the everyday use of office space by our employees and co-workers, as well as in the locations used by our tenants and subcontractors, we promote a closed-loop economy. For this purpose, we have implemented, in accordance with our policy, to reduce waste to a minimum by:

- use of water dispensers, which reduces the use of plastic bottles
- waste battery bins for proper disposal and recycling
- recycling bins for plastic, paper and glass
- electronic documentation circulation
- e-waste is recycled
- use of recycled building materials such as wood, concrete, glass and plastics.



ESG report

DL Social

05

According to the values of DL Invest Group, our company is created primarily by people and they are behind every success we achieve, which is why we focus on the quality of relations and cooperation with employees, customers and the local community. As part of our activities, we also promote charity campaigns such as Szlachetna Paczka or other such initiatives in which all employees of our company are involved.

All our policies are available on our website.

Working conditions

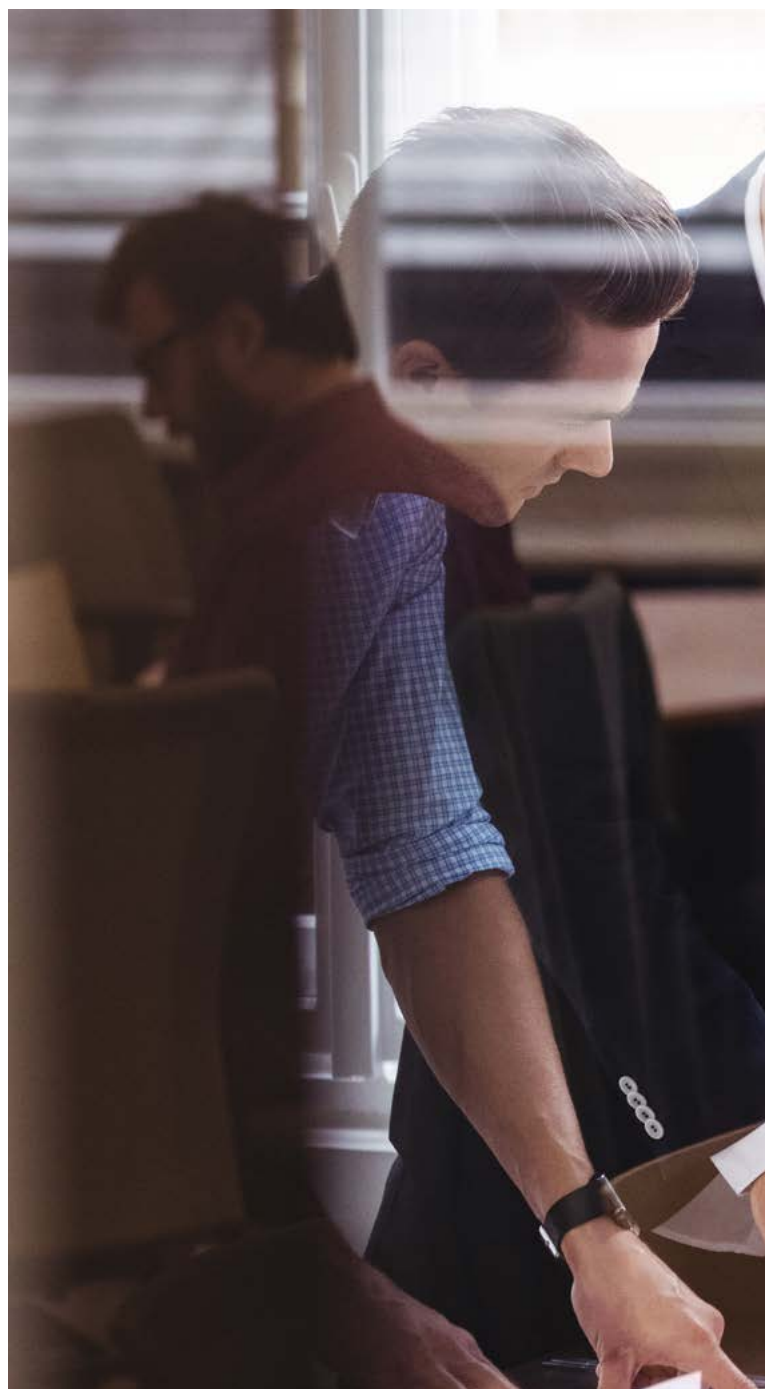
DL Invest Group has implemented a human rights and labor standards policy, which is an important and key part of our commitment to these values, as it focuses on ensuring that our employees and non-employees are treated with dignity, fairness and respect.

This policy covers the following issues:

- Our Code of Conduct and Ethics
- Our Workplace Practices
- Employees' Rights
- Equality of Opportunity, Diversity and Inclusion
- Employee Health and Safety
- Human Rights in Our Supply Chain
- Supplier Involvement and Contract Performance
- Procurement and Delivery

At DL Invest Group, we strive to attract, engage and retain employees who can help deliver our business strategy in a way which aligns with our core commitment to our core values, ethical conduct and integrity in all we do. We recruit highly competent individuals on the basis of appropriate education, training, skills, and experience. Our commitment to our employees is to respect and uphold their rights in all aspects of their employment and engagement with DL Invest Group. Our approach to creating an ethical working

environment stems from a basic appreciation and respect for core internationally accepted labor standards. These employee rights are encompassed in the globally ratified International Labor Organization's Declaration of Fundamental Principles and Rights at Work which we support,



and are enhanced by advanced human resources practices. We strive to maintain an inclusive work culture in which each employee feels respected and valued and has the opportunity to develop and grow in line with business needs and personal aspirations. We offer all individuals equal opportunity to join the Company, and to progress within the Company according to performance and potential. We embrace employees from all possible backgrounds representing different dimensions of diversity which include gender, race, color, religion, nationality, age, sexual orientation, disability, marital status, and other aspects of diversity. We aim to ensure that our workplace is free of all forms of discrimination, harassment, violence and other behaviors which might negatively impact the workplace experience, such as alcohol

or substance-abuse. Company's employees receive periodic trainings on relevant issues relating to anti-harassment and discrimination.

Occupational Health and Safety

DL Invest Group is committed to providing all employees with a healthy and safe workplace, free from all known health and safety risks. We comply with all laws and regulations relating to employee safety to ensure that safe working practices are followed. We comply with Occupational Health and Safety standards. DL Invest Group has implemented an Environmental Management System based on the standards of ISO 14001:2015.



Employee diversity and inclusion

We have implemented an anti-discrimination policy in our company. DL Invest Group cares for a work environment in which all people are treated with respect and dignity. Every person has the right to work in a professional atmosphere that promotes equal employment opportunity and prohibits unlawful discriminatory practices, including harassment. Therefore, DL Invest Group expects that all relations between persons employed in the Company will be of a business nature and will be free from explicit bias, prejudice and harassment.

This policy is designed to provide equal employment opportunity without discrimination or harassment based on race, color, religion, sex, sexual orientation, gender identity or diversity, age, disability, marital status, citi-

zenship, national origin, genetic or other characteristics protected by law. DL Invest Group prohibits all such discrimination and harassment. DL Invest Group encourages to report any noticed cases of discrimination or harassment. It is our policy to promptly and thoroughly investigate such reports. DL Invest Group prohibits retaliation against persons reporting cases of discrimination or harassment or participating in the investigation of such reports.

This document covers the following areas:

- Objectives
- Equal employment opportunity
- Retaliation prevention
- Sexual harassment prevention



- Harassment prevention
- Individuals and Conduct Covered by the rules
- Reporting an Incident of Harassment, Discrimination or Retaliation
- Complaint Procedure
- Whistleblowing

Development and training

In accordance with the policy of human rights and labor standards in our company, we successively implement training every year in thematic areas relevant to the position held. In addition, before starting work, each employee undergoes mandatory occupational health and safety training, and in the first week of work, new employee goes through an implementation cycle lasting

about 3 days, the aim of which is to familiarize the employee with the functioning of each department. DL Invest Group has also taken steps to implement an internal training platform in thematic areas to further improve the competences of employees and associates..

Human rights

We believe that employees should know their rights in respect of their employment with our Company. Employees join DL Invest Group out of their own free will and in full agreement to the proposed terms and conditions. We do not require any employee to remain in employment for any period of time against his or her will, or use practices which restrict employees' ability to terminate employment. We do not engage in forced labor in any



EMPLOYEE MANAGEMENT:

- Employment policy, working conditions, competence development, equal opportunities, employee safety and health.
- Team relations, employee involvement, support in professional development.

RELATIONS WITH CUSTOMERS:

- Quality of customer service, transparency, responsibility for products and services.
- Customer satisfaction activities, problem solving, ethics in customer relations.

COOPERATION WITH SUPPLIERS:

- Cooperation with suppliers, ethical standards, sustainable supply chains.
- Monitoring and minimizing negative impact on suppliers.

LOCAL COMMUNITY INVOLVEMENT:

- Cooperation with local communities, social initiatives, support for local projects.
- Dialogue with residents, activities for local development.

CHARITABLE AND SOCIAL ACTIVITIES:

- Support for charitable organizations, social initiatives, activities for the public good.
- Social responsibility as part of our business strategy.
- Impact on consumers and end users.w

way, and we do not employ children in any part of our business operations. As a minimum, DL Invest Group employees are rewarded in accordance with laws and regulations governing salaries and benefits in Poland, where we operate.

Further, we respect the right of employees to open communication and human and equitable treatment. We maintain open and direct communication with our employees through our Human Resources Department and encourage their full participation in our business. We provide updates to employees about business activities and results, and all other matters which affect them, or may help them perform their roles more effectively. During the course of employment, management and members of our Human Resources team are committed to responding to all questions or grievances raised by employees relating to terms and conditions, rights and any other matters of concern.

Human rights issues are detailed in the Human Rights and Labor Standards Policy.

Social relations

Our social relations refer to the relations and interactions between the company and various stakeholder groups. This includes both internal relations within the organization and external relations with employees, customers, suppliers, the local community and other entities. In order to maintain transparency of communication and relations with our stakeholders, we have implemented internal regulations regarding employee management, as well as a code of ethics, human rights policy and anti-discrimination policy.

Impact on consumers and end users

Our clients are obliged to comply with the Code of Ethics and accompanying policies, such as anti-discrimination, anti-corruption and human rights policies.

Our vision is, above all, to consolidate and strengthen our position in the market through a unique business model that combines the common interests of the tenant and DL Invest Group, which as a landlord, developer and ultimate long-term owner of the property, based on internal structures, actively manages the project to generate additional value for the tenant, thereby acting in its own interest by meeting all the needs of the

tenant and striving to maximise the long-term use of the building to the highest standard. As a reliable business partner, DL Invest Group's priorities are to meet the requirements of its customers and the quality of its investments.

Whistleblowing

A whistleblowing system is a type of „ethical whistleblowing,” reporting irregularities in the workplace for the sake of the greater good. Whistleblowing involves exposing irregularities, illegal, dishonest or prohibited activities that occur in the workplace. A necessary criterion for the system to work effectively is that the whistleblower act in good faith, that is, based on facts and other objective motivations, as opposed to personal considerations (e.g., a sense of injustice, desire for retaliation, or vested interests of the individual).

Reports can be made openly, confidentially and anonymously. The whistleblower, by opting for an open reporting, agrees to fully disclose his or her identity - both to those involved in explaining the notification and to outsiders.

Confidential reporting is a situation in which the whistleblower can be identified, but his or her personal information is kept secret and not shared with unauthorized parties.

Anonymous reporting not only does not reveal the whistleblower's personal information, but also does not allow the whistleblower to be identified in any way (e.g., due to the use of communication channels that prevent identification).

ESG report

DL Governance

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Corporate governance

DL Invest Group transparently presents the company structure, which includes:

- Management Board
- Supervisory Board

The Management Board, as a body that makes decisions and manages operations within the company's operations, has full competences and experience in this area, and at the same time supplements its activities with cooperation with directors of individual departments, who support the company's operation in appropriate areas with their knowledge and experience.

The Supervisory Board supervises and ensures that the Management Board performs its duties correctly.

Our company applies the principles of transparency in paying taxes, avoiding tax havens and preventing tax fraud. We are audited annually by an independent third party.

DL Invest Group annually estimates the risks related to the company's activities, both financial and operational, and each time these risks are included in the annual financial statements.

Our company makes every effort to improve the policies regulating our ethics in business activities, counteracting corruption, conflicts of interest and other issues related to ethics every year. As a result, a full set of documents in this area has been implemented and is operational among our employees, collaborators and third parties.

Corporate culture and responsible business conduct

Both the Management Board and Employees of **DL INVEST GROUP** are aware that among the factors having a significant impact on the company's image, ethical values occupy an important place. At DL INVEST GROUP, we do not use unethical and illegal business practices. We are aware and deeply believe that compliance with ethics in business ensures a high competitive position and strengthens the reputation of DL INVEST GROUP.

We try to ensure that the relationships we have with contractors, clients, and also with our competitors are based on honesty and healthy principles of competition. We also appeal to our business partners to support fair competition and condemn all forms of unfair and illegal practices used to obtain undue benefits.

Bribery and corruption

DL Invest Group adheres to a zero-tolerance policy towards all forms of corruption.

Corruption is contrary to our Company's principles of functionality and responsibility. We act fairly and honestly. We strive to act in a modern, dynamic and friendly manner and we are committed to openness and transparency in our operations. We want to be trusted by our customers and colleagues and seen as a responsible corporate citizen.

The zero-tolerance policy on corruption applies to everyone, from Company employees through colleagues to business partners acting on our behalf. It is the responsibility of all management to take a key role in creating an organizational culture in which corruption is unlikely to occur and is unacceptable in any form. The Anti-Cor-

MANAGEMENT



Dominik Leszczyński
CEO, Founder

Founder of DL Invest Group responsible for the strategy, management and supervision of the Group's individual processes. He has been conducting development activity since 2004, in 2006 he founded a real estate fund under the name DL Invest Group. A graduate of the Faculty of Law and Administration of the University of Silesia.



Wirginia Leszczyńska
COO, Co-Founder

As the sister of Dominik Leszczyński, she has been holding managerial positions within the DL Invest Group for over 10 years. As a Licensed Property Manager (license number 26401), she specializes in the commercialization of logistics real estate. A graduate of the University of Economics in Katowice.



Tomasz Brodzki
CPO, Vice President of the Management Board for Investment Projects

Associated with DL Invest Gro-up for many years, holding managerial positions. Responsible for the proper course of construction processes. M.Sc. In construction and economics, he has over 20 years of experience in the construction industry, e.g. in Lidl and Metro Group projects.



Aneta Kulik
Management Board Proxy

A graduate of the University of Silesia in Katowice, she also studied at ESDES Business School in Lyon-France. She has many years of experience in performing management functions in the financial sector. For more than 5 years associated with DL Invest Group, she focuses primarily on the commercialization of its facilities.

FINANCE STAFF



Jakub Machul
Consolidation and Finance Manager

A graduate of UE University in Katowice. Over 13 years in Audit (BIG 4 as Manager) experience in: GPW companies, consolidation, MSSF. Expert in finance and accounting, responsible for financing and consolidation. Supervision of finance and accounting department. Is finalizing the process of the license of a statutory auditor.



Marek Podchul
Finance Manager

Certified auditor with over 15-year experience in finance and audit gained in Deloitte. Experienced with companies from various industries both Polish and from multinational group and listed entities. A graduate of University of Economics in Katowice. In DL Invest Group responsible for supervision of finance and accounting department, optimization processes, consolidation and financing.



Dorota Tokar
Deputy Financial Director - Treasury

A graduate of the Silesian University of Management, with over 17 years of experience, which she gained i.a. at the Hungarian investor TriGranit Development Corporation. Associated with DL Invest Group for 7 years, currently holds the position of Deputy Financial Director responsible for the Treasury area.



Dariusz Bartecki
Director of Corporate Supervision

Supervision of the company's property and all assets. Responsibility and coordination for the preparation of real estate operating budgets. Analysis and preparation of procedures regarding the management structure of DL Invest Group. Supervision of staff recruitment and implementation. Tasks assigned by the company's management board.

CORPORATE GOVERNANCE

ruption Policy should be widely communicated and implemented among our Company's employees. This Anti-Corruption Policy should be interpreted in conjunction with the applicable Polish and international legal regulations regarding the phenomenon of corruption, which together set out a model pattern of conduct when encountering the phenomenon of corruption in professional life.

This document covers the following scopes:

- Aim
- Definitions of bribery and corruption
- Principles of the Anti-Corruption Policy
 - Transparency of Corporate Governance
 - Compliance with laws and international conventions
 - Areas of corruption risk
 - Responsibilities of Employees and Associates
 - Obligations of contractors, suppliers and cooperating companies
 - Procedure for reporting abuse
 - Record keeping, transparency and control procedures.
 - Final provisions

Political influence and lobbying activities

Our Anti-Corruption Policy stipulates that DL Invest Group will comply with both national and international anti-corruption laws in its business activities, taking into account the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the United Nations Convention Against Corruption of the Council of Europe and the United Nations Criminal Law Convention Against Corruption, United Nations Convention against Corruption, the Council of Europe Criminal Law Convention on

Corruption. DL Invest Group, in countries with local anti-corruption regulations such as the US Foreign Corrupt Practices Act (FCPA) or the UK Bribery Act, ensures compliance and application of such local laws.

Relations with suppliers

DL Invest Group tries to maintain and develop good relationships with its contractors, suppliers and business partners, the rules of this procedure are regulated in this respect by both the Code of Ethics and the Anti-Corruption Policy, and the company has also implemented a procedure for selecting subcontractors and suppliers. When choosing goods or services, employees are guided primarily by price and quality criteria and strive for the widest possible range of offers from competing companies.

Employees base their mutual relations on trust and respect reliability in settling their obligations.

Data privacy and security

DL Invest Group places particular emphasis on maintaining the principles of confidentiality of information in the organization. All information regarding cooperation with our Business Partners is stored and used with complete confidentiality of the full scope

of information. Our company has also implemented a confidentiality clause and IT department security procedures.



The purpose of this Policy is to establish an obligation for us and our colleagues and business partners to have zero tolerance for bribery and corruption as well as to ensure that measures are in place to operate in compliance with applicable laws. The policy provides guidance to identify and avoid risks of fraud. The policy is aimed at employees, coemployees, contractors, all business partners and the management of DL Invest Group.

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ESG report

Additives

- **reporting methodology,**

When reporting ESG for 2022, both financial significance and the impact of activities on the environment were taken into account, for this purpose an analysis of the above factors was carried out within the organization.

- **data sources**

Information on the market and environmental situation was taken from the following sources:

[Zmiany klimatu – Europejska Agencja Środowiska \(europa.eu\)](https://europa.eu)

[Jak zmienia się nasz klimat? - Edukacja Ekologiczna - Portal Gov.pl \(www.gov.pl\)](https://www.gov.pl)

[Zmiany w ubezpieczeniach społecznych 2022 - Infor.pl Główny Urząd Statystyczny / Obszary tematyczne / Inne opracowania / Informacje o sytuacji społeczno-gospodarczej / Biuletyn Statystyczny Nr 12/2023](https://www.infor.pl)

[Rozliczenie CIT spółek nieruchomościowych w 2021 roku - Infor.pl](https://www.infor.pl)

[Łagodzenie zmian klimatu i adaptacja do ich skutków. Realizacja inwestycji w zakresie zielono-niebieskiej infrastruktury miast - Narodowy Fundusz Ochrony Środowiska i Gospodarki Wodnej - Portal Gov.pl \(www.gov.pl\)](https://www.gov.pl)

[THE 17 GOALS | Sustainable Development \(un.org\)](https://un.org)

Best practice 2021 <https://www.gpw.pl/best-practice2021>

Information on utility consumption was taken from source documents of utility suppliers for individual locations.

Information regarding the principles of operation of DL Invest Group was taken from the following sources:

- Assumptions for changes in environmental protection over 5 years
- DL Invest Group Code of Ethics
- Anti-Corruption Policy
- Anti-discrimination policy
- Human rights and labor standards policy
- Green Framework
- DL Green Policy
- Waste management policy



british polish 
chamber of commerce



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