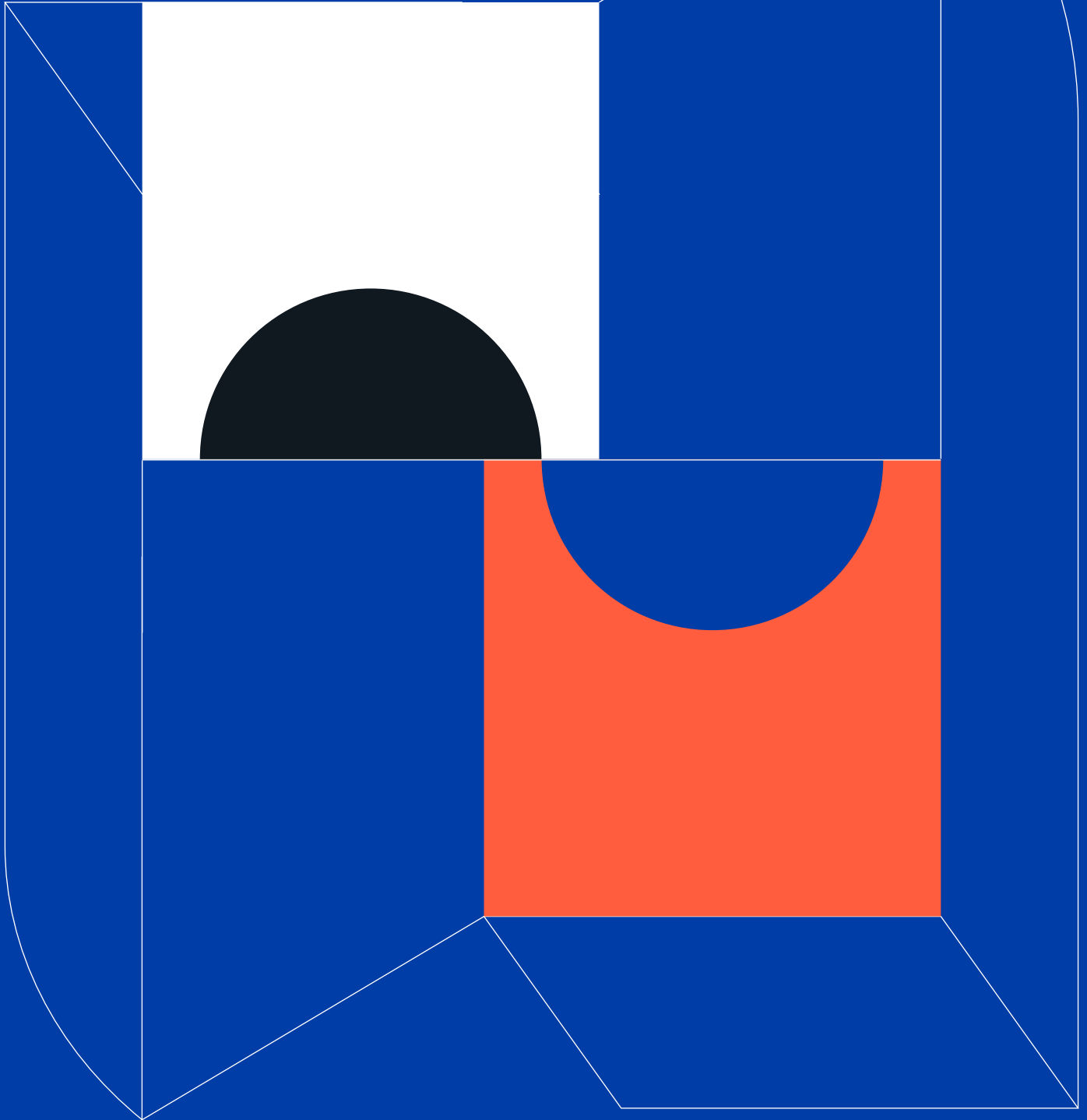


# SUSTAINABILITY REPORT

EXTRACT FROM  
THE COVIVIO HOTELS 2024  
UNIVERSAL REGISTRATION DOCUMENT



**COVIVIO**  
HOTELS

# 3

## Sustainability report

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## 3.1 General information

### 3.1.1 Editorial by the Chief Executive Officer

Droughts, heat waves, forest fires, floods, extreme weather conditions have reached new heights<sup>(1)</sup> in 2024, with their train of human tragedies. In this context, European regulations continued to gradually strengthen, in an attempt to contain global warming (which reached + 1.3°C in 2024), reduce pollution, the use of plastics, etc., or to standardise CSR reporting, with the implementation of the CSRD<sup>(2)</sup>.

Our CSR report for 2024 is the first to be drafted in compliance with the provisions of the CSRD. As Covivio Hotels' Sustainable Development strategy stems from the Group's strategy in this area, this report is an extension of the report published at Group level.

Covivio Hotels wishes to continue its development in the main tourist destinations and in particular in Southern Europe, in the mid to upscale hotel segment. Covivio Hotels is increasingly choosing to directly manage part of its portfolio, by acquiring the business assets of the properties it owns. This reflects our ambition to increasingly become a hotel operator, and not just a real estate investor (fixed or variable leases). Thus, 43 business assets, previously held by AccorInvest, were exchanged at the end of 2024, against 16 hotel properties belonging to Covivio Hotels.

A major challenge for Covivio Hotels is to meet the targets of our carbon trajectory. Extensive audits and analyses have been performed in recent years. A performance monitoring and modelling platform has been developed and deployed across the portfolio in order to refine the action plan and, in particular, the improvement work to be implemented to achieve the target of -70% between 2010 and 2030 (-53% by the end of 2024) and to comply with the CRREM trajectory<sup>(3)</sup>. This approach is the subject of frequent discussions with our partners. We are gradually phasing out fossil fuels by replacing heating equipment. The repositioning work is an opportunity to improve the efficiency of the technical installations, as at the Novotel in Bruges this year<sup>(4)</sup>.

The development of our Nature strategy is another major achievement for Covivio. It is the result of more than two years of work and a synthesis of our policies and actions in the areas of climate and biodiversity, water and the circular economy. This is a collaborative effort at the European level with operational teams and the involvement of governance at each stage of the project, both at the level of the Executive Committee as well as the Board of Directors via its CSR Committee. This Nature strategy, based on a holistic approach, addresses several of our material challenges that emerge from the analysis of the Group's impacts, risks and opportunities. Our Nature report, which is aligned as closely as possible with the TCFD and TNFD recommendations<sup>(5)</sup>, presents the 21 multi-year objectives adopted.

21 is also the number of associations which our Corporate Foundation supports, with equal opportunities as the common objective. Covivio is also continuing its commitments in the social and societal field.

2025 is beginning with a number of uncertainties over how the European Green Deal and associated regulations will be simplified. Despite the frequent regulatory changes, Covivio and its subsidiaries are maintaining their CSR objectives and continuing to transform, with the support and commitment of all levels of the company.

Agility and adaptability, our culture of partnerships and innovation are all assets that have enabled Covivio and Covivio Hotels to establish themselves amongst the leaders of their markets in Europe and to anticipate and adapt to constantly changing situations, while remaining true to our convictions and values.

**Tugdual Millet-Taunay**  
**Chief Executive Officer (CEO)**

(1) *first annual review* by the World Weather Attribution institute published this Friday, December 27, 2024, in collaboration with the Climate Central research institute

(2) CSRD : Corporate Sustainability Reporting Directive

(3) CRREM: Carbon Risk Real Estate Monitor.

(4) Covivio and Accor unveil the hotel Novotel Bruges Centrum - Covivio

(5) TCFD/TNFD: Taskforce on Climate/Nature Financial-related Disclosures.

## 3.1.2 General information (ESRS 2)

### 3.1.2.1 Sustainability reporting scope and methodology (ESRS 2 BP-1/2)

The sustainability information of Covivio Hotels, a consolidated subsidiary of Covivio, was previously included in the CSR Chapter (Chapter 3) of Covivio's Universal Registration Document. As the CSRD has removed the reporting exemption for consolidated subsidiaries, this Chapter 3 constitutes Covivio Hotels' sustainability report. However, Covivio Hotels' sustainable development strategy is implemented at Group level, with operational variations by activity. This is the reason why a large amount of the information in this chapter relates to the Covivio Group.

This information has been compiled in the context of the first-time application of the above-mentioned articles, and is characterised by uncertainties regarding the interpretation of the legal texts and the lack of a reference framework, particularly for the double materiality analysis. These uncertainties concern, in particular, the treatment of greenhouse gas emissions related to the tenants of the buildings, accounted for in Scope 3 of greenhouse gas emissions (see section "3.2.1.6 / Gross GHG emissions of Scopes 1, 2, 3 and total GHG emissions (E1-6)"). The context of the first year of application is also characterised by the estimation of part of the energy consumption data (see the "3.2.1.5 Energy consumption and mix (E1-5)" section), water (see the "3.2.3.4.1 / Total water consumption across the portfolio" section) and waste production and treatment (see the "3.2.5.5.1 / Production and treatment of waste in the operating portfolio" section), as well as by an initial reporting exercise of social data on the Covivio Hotels operating properties scope (see the "3.1.2.5 / Action plan (MDR)" section).

Covivio Hotels has prepared this sustainability report in accordance with the European Corporate Sustainability Reporting Directive (CSRD) and its 12 European Sustainability Reporting Standards (ESRS). The provisions of the CSRD were transposed into French law by the Order of 6 December 2023 and Decree No. 2023-1394 of 30 December 2023. Strengthening corporate sustainability reporting requirements is a key aspect of the Green Deal for Europe. The main objective of the CSRD is to harmonise companies' sustainability reporting and to improve the availability and quality of published ESG (environmental, social and governance) data. This information has been compiled in the context of the first-time application of the above-mentioned articles, and is characterised by uncertainties regarding the interpretation of the texts and the lack of a reference framework, particularly for the double materiality analysis. Despite the uncertainties highlighted, the sustainability report was prepared and presented in accordance with the ESRS requirements, and improvements are already expected to improve the quality of reporting:

- a better understanding of future requirements with the publication of guidance and Q&A from the European Commission (in particular guidance relating to the transition plan);
- improvement in the quality of the source data on certain indicators, thus improving future estimates;
- benchmark information, which is limited at present but which should emerge as more and more companies publish/report information in accordance with the CSRD;
- the stabilisation of reporting practices, particularly with regard to taxonomy.

#### The 12 ESRS standards

Cross-cutting standards	Environment	Social	Governance
ESRS 1 General requirements	ESRS E1 Climate change	ESRS S1 Own workforce	
	ESRS E2 Pollution	ESRS S2 Workers in the value chain	
	ESRS E3 Water and marine resources	ESRS S3 Affected communities	ESRS G1 Business conduct
ESRS 2 General information	ESRS E4 Biodiversity and ecosystems	ESRS S4 Consumers and end-users	
	ESRS E5 Resource use and circular economy		

#### Other legislation and reference frameworks

Over the past several years, Covivio has followed the recommendations of the European Public Real Estate Association (EPRA) to prepare its financial and sustainability reports. The table of compliance with EPRA recommendations is presented in section 3.5.1. Covivio also conforms with the GRI Standards, the SASB<sup>(1)</sup> standards and the TCFD AND TNFD, which the Group began applying in March 2023 and December 2024 respectively.

This Chapter 3 of the Universal Registration Document (URD) details the objectives and actions comprising Covivio Hotels' low-carbon strategy and notably presents the energy consumption and CO<sub>2</sub> emissions associated with the use of buildings, corrected for climatic conditions. Annually, Covivio presents a detailed report on greenhouse gas emissions by activity, in particular by reviewing the climate-related issues connected to the obligation introduced by the Grenelle II law of conducting a greenhouse gas assessment.

(1) Sustainability Accounting Standards Board.

This reporting has been part of the 17 Sustainable Development Goals (including SDG 13 "Climate Action") defined by the United Nations since 2017. It collects information on the company's handling of the social and environmental consequences of its activity, as well as an analysis of the consequences of this activity on climate change. The financial risks inherent in the effects of climate change appear to be limited in the short term for the Group. Nevertheless, Covivio has been carrying out a range of more specific and in-depth assessment studies since 2017. Actions are often carried out in coordination with key tenant accounts, associations and leading initiatives (Alliance HQE, BBKA, Orée, Sekoya).

Covivio's risk review takes the provisions of the law of 23 October 2018 on the fight against tax evasion into account. Chapter 4, section 4.2.6.74 describes the policies and actions taken to comply with the tax regulations of the countries in which Covivio operates. The list of consolidated companies is presented in Chapter 4, section 4.2.3.3 of this document. Furthermore, given the nature of Covivio's activities, as detailed in this document and more specifically in its business model (3.1.2.3), the implications of the sustainable food law of 30 October 2018 (combating food insecurity, respect for animal welfare and responsible, fair and sustainable food) appear to be limited for the company. In accordance with law n°. 2023-703 of 1 August 2023 amending Article L. 225-10-21 of the French Commercial Code aimed at promoting the bond between the Nation and the army and supporting engagement in the reserves, the Group will authorise leave for reservist employees who declare themselves to the Human Resources Department in this capacity. To date, given the absence of employees declared to Covivio, this has no impact on the Group's financial performance.

## Reporting scope

This sustainability report covers the scope of the consolidated activities, in line with Covivio Hotels' financial report. This reporting covers the company's upstream and downstream value chain as far as possible (3.1.2.3). It focuses both on its relations with its different upstream (suppliers, regions, consultants, etc.), and downstream stakeholders on its partnership strategy, which is one of the keys to its success, in particular with tenants, financing organisations, etc.

## Time horizons

The time horizons are defined as follows in the pages of this CSR Chapter:

Horizon	Time frame	Scope covered
Short-term	< 1 year	Preferred scope for actions that do not require an in-depth analysis or a high level of governance approval.
Medium-term	2 to 5 years	The CSR action plan is divided into 5-year sequences in order to measure the progress made on longer-term objectives.
Long-term	6 to 10 years	The horizon for larger-scale projects (including developments) requiring the use of forward-looking scenarios and a long-term vision of regulatory and market developments.
Very long-term	> 10 years	Although distant and not defined by the CSRD, very long-term work is necessary to fully understand risks, particularly those related to climate, in order to understand potential IROs and adapt the strategy.

These definitions comply with ESRS 1 and the sequencing of Covivio's CSR action plan. If a different time horizon is used in any of the sections of this chapter, it will be specifically mentioned.

Marginal differences between financial and non-financial reporting scopes are specified in the relevant sections, when they exist. This Chapter 3 also takes the provisions already published as part of the European regulation of the European "green" taxonomy into account.

The environmental reporting is based on the financial control scope. A distinction is made for environmental indicators according to the management method used by Covivio:

- **Operational control:** this is the scope covered by the EPRA recommendations. This concerns the common areas of multi-tenant buildings, which are directly managed by Covivio's or its subsidiaries' teams. This scope also includes Covivio's head offices in Europe. These are Covivio's Scopes 1 and 2 (direct emissions related to the energy consumption of the scope, managed directly and paid for by Covivio). The "operational control" scope following the acquisition of new business assets in 2024 now includes hotels whose business assets are managed by Covivio Hotels (previously included in the non-operational control scope).
- **Non-operational control:** this concerns the scope of buildings or parts of buildings which Covivio or its subsidiaries do not manage directly, but which is carried out by the tenant (value chain – assets leased downstream), from whom energy and water consumption and waste volume (if available) are collected. These are single-tenant buildings under leases. This class of assets constitutes Scope 3 for Covivio, linked to the energy consumption of the buildings it owns.

The scopes and calculation methods are detailed in two reporting protocols: one dedicated to environmental indicators and the other to social indicators. They are online on the Covivio website. Unless otherwise specified, the data presented in this report is provided on a like-for-like scope basis. The main calculation rules, estimates and data sources are specified in the ESRS concerned, in particular for ESRS E1, E3, E5 including the environmental reporting of the assets held. Covivio depends on its value chain (tenants and suppliers) for a majority of the quantitative data points for the information required to produce its reports. Some social information not available from hotel operators will be collected in 2025 following this first reporting fiscal year. To the best of the knowledge of the persons responsible for the preparation of this report, the information contained in the CSR Chapter of this document is factually correct and contains no omissions likely to affect its significance. Moreover, the CSR Chapter of Covivio Hotels' URD is not subject to the disclosure exemption this year.

## Commitment to transparency with stakeholders

Different channels are used to communicate with stakeholders:

	Universal Registration Document	Nature report	Covivio Online	The magazine	Ethical Charter	Responsible Purchasing Charter
<b>Targets/ Stakeholders</b>	Investors/Banks/SRI analysts/French Financial Markets Authority ( <i>Autorité des Marchés Financiers</i> - AMF) Individual shareholders/NGOs	Investors/Banks/SRI analysts/French Financial Markets Authority ( <i>Autorité des Marchés Financiers</i> - AMF) Individual shareholders/NGOs	Investors/SRI/ Customers and partners/Suppliers/ NGOs/Employees/ Civil society	Investors/SRI/ Customers and partners/Banks/ Suppliers/ Shareholders/ Employees/Civil society/NGOs	Employees/Civil society/ Shareholders/NGOs/ Rating agencies	Suppliers/Certifiers/ Customers and partners/Employees/ Civil society
<b>Where can I find the information?</b>	Publications - Covivio	Publications - Covivio	covivio.eu/Linkedin	Publications - Covivio	Publications - Covivio	Publications - Covivio

Covivio has also adopted and published the following policies, which apply to the activities of Covivio Hotels:

- an [Environmental policy](#) in 2022, [updated in early 2025](#);
- a [Human Rights policy](#) in 2024.

## Reliability and accuracy of the information produced

Covivio strives to produce the most reliable data possible, using several levels of analysis, consistency checks and validation. However, there is no such thing as zero uncertainty, particularly with regard to the environmental data of the buildings which are not directly managed by Covivio. Covivio therefore cannot guarantee a zero level of uncertainty, either for the results presented or for future objectives. The internal control procedures for sustainability information are described in section 3.1.2.2.5. They apply the Group's risk management practices and aim to ensure that the information produced is reliable. If changes in the preparation or presentation of sustainability information occurred, Covivio would explain the reasons for these changes in the future and, if necessary, would provide the restated figures for the previous year. Similarly, if a material error was identified in the CSR reporting for one or more previous periods, this would be reported in the Sustainability Report, together with, if possible, corrective data and the origin of the error.

In each ESRS, Covivio includes the quantitative metrics and monetary amounts measured to date. The levels of uncertainty or the reasons for the absence of data are specified in the relevant sections. The main source of uncertainty comes from value chain data, especially concerning water and energy consumption and waste production.

The Group's Sustainable Development Department collects consumption data from the Property Management services and operators (invoices for communal areas), tenants, and energy

and water producers or distributors. After consolidation, these data are restated by making climate adjustments (winter and summer) so that the results are comparable on a year-to-year basis. The data is analysed internally, involving investigations with the relevant parties and then an audit by an independent third party (3.6.1). The systematisation of automated data collection is a way forward for guaranteeing data accuracy and reducing the reporting burden associated with the current process.

## Use of estimates

The calculations for estimating missing data are explained in Covivio's environmental and social reporting protocols. When data are derived from an estimate, this is clearly indicated in the reporting tables or in the narrative section where the data is presented.

The estimates mainly concern:

- water and energy consumption: for the months when the data is not available in time (December for energy, last quarter for water);
- waste production: the data is available for assets which have a specific waste collection contract. If not, the data is systematically estimated on the basis of the frequency of collections and volumes collected.

## The resources and means implemented

This report was prepared with the assistance of the Group's functional and operational departments working at various levels of the Company. CSR intermediaries in each activity (operational and functional levels) periodically submit information which is relevant to monthly, quarterly or annual reporting to the Group's Sustainable Development Department. The resources used are detailed in each ESRS in connection with the action plans.

### 3.1.2.2 Governance of sustainability issues anchored in the Group's organisation (GOV)

Covivio Hotels is a partnership limited by shares (*société en commandite par actions* - SCA). It is distinguished by the presence of two types of partners:

- General Partners, who are indefinitely liable for corporate liabilities out of their own assets;
- Limited Partners (shareholders), whose liability is limited to their contribution and whose shares are freely negotiable. They are represented by a Supervisory Board.

The governance of the SCA is based on a separation of powers: the Management, composed of natural or legal persons, who are General Partners, who perform the executive functions, while the Supervisory Board exercises a controlling role. Collective decisions require a dual consultation: of the Limited Partners at the Shareholders' Meeting and of the General Partners. However, only the limited partners appoint the members of the Supervisory Board, thereby excluding general partners from this vote if they are also limited partners.

Unlike public limited companies, a SCA is managed by the management and not by a collegial body such as a Board of Directors. Similarly, the financial statements are closed by management, without intervention by the Supervisory Board. The company has been managed by a single manager since 30 November 2004: Covivio Hotels Gestion, chaired by Tugdual Millet-Taunay.

#### The main information related to the Supervisory Board of Covivio Hotels (EPRA Gov-Board):

- **13** members
- **46%** women and **54%** men
- **23%** independent members
- **80%** attendance rate at the 7 Board meetings in 2024
- Average terms of office of **8.3 years**
- **1** Audit Committee

For more information on:

- the Composition of management: 5.2.1.1;
- the Powers of the Manager and its limitations: 5.2.1.2;
- the diversity policy: 5.2.1.5.

Covivio Hotels' General Management is structured around various committees set up within the Covivio Group, including the Executive Committee at European level. The Executive Committee, which is the body at the heart of the corporate governance system, is a forum for reflection, consultation and decision-making on the Group's major strategies. It meets several times a month, either in person in one of the cities where the company is present or remotely, *i.e.* around thirty times in 2024. The Executive Committee, which has a European dimension, approves every important decision or operation concerning the asset rotation policy, the monitoring of subsidiaries and shareholdings, the financial policy, etc. It also addresses issues of organisation, CSR, tools, etc.

The Executive Committee, whose composition is presented in section 5.2.1.4 of the Group's Universal Registration Document (URD), consists of 12 members at the end of the 2024 financial year, including representatives from all of Covivio's "country" and "product" activities and corporate functions.

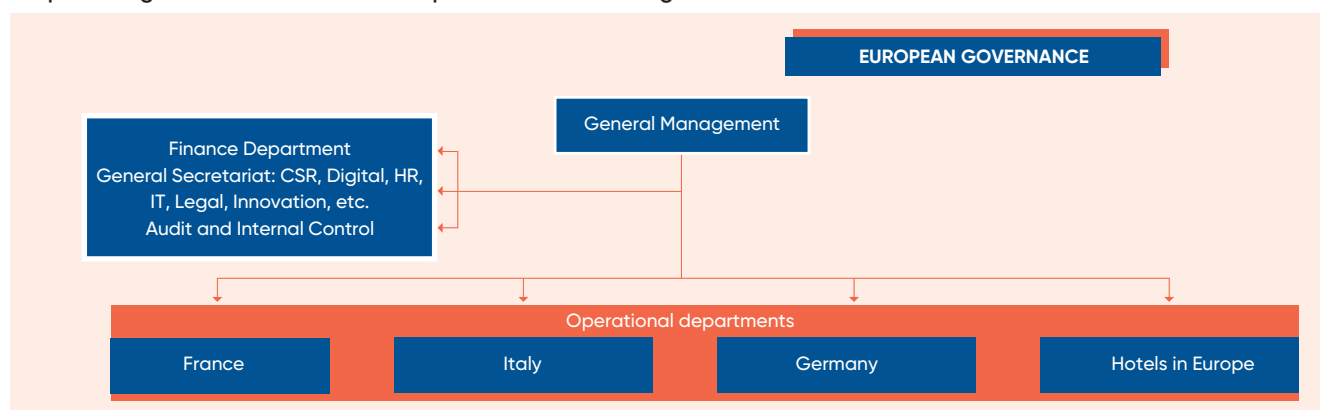
The diversity of this Committee, in terms of gender, age, experience, nationality and skills, enables it to provide the best support for the Group's strategic challenges. Covivio's Executive Committee is responsible for approving all investment and disposal projects in excess of €5 million. Its members are responsible, in their area of accountability, for implementing the Group's CSR objectives, in coordination with the Sustainable Development Department.

The Executive Committee is supported by the country and operational Management Committees, in charge of:

- monitoring operations;
- budget implementation (finance, asset management, portfolio);
- corporate issues.

Covivio Hotels is represented on the France Management Committee by its Chief Executive Officer (CEO) and its Deputy CEO, in charge of the operating properties business, thus acting as a link with the Covivio Hotels' Management Committee.

#### Simplified organisation chart of the European Executive Management





### 3.1.2.2.1 Overview of sustainability governance (GOV-1)

As CSR has a strategic dimension for Covivio's business model and development, its governing bodies are committed to promoting the creation of value by the company by taking the social, societal and environmental issues that the company's activities face into account.

Covivio confirmed the importance of social and environmental issues at the heart of its corporate and property strategy by defining its Purpose (Build sustainable relationships and well-being) at the end of 2019, and enshrining it in its articles of association in 2024. By modifying their economic model, Covivio and its subsidiaries are going beyond the simple pursuit of profit, because they believe that this goal should form part of a broader mission involving all of the stakeholders who contribute to the company's success. Thus, with its Purpose, Covivio is affirming its ambition to get even closer to its end users and to create, for them, living spaces for working, travelling and living.

Covivio's CSR policy is adapted to the regulations and specific characteristics of the markets in each country where the Group is developing. It is shared by all its businesses in Europe and at all levels of the company. This CSR policy is described in plans of action, which are rounded out and adapted by regularly analysing the risks and opportunities presented by the environment in its field of activity. This strategy is the subject of a dedicated Group-wide governance structure. The Executive Department, which has a European dimension, ensures that the various functions and operational departments of the Group take social, societal and environmental issues into account as part of the implementation of the strategy defined by the Board of Directors. In addition, specific meetings are regularly organised with the operational departments of Covivio Hotels to monitor the implementation of the action plan. In addition, all Covivio Hotels employees attended an information session on European non-financial regulations (Taxonomy and CSRD).

The four aspects of Covivio's CSR strategy apply to all its businesses: Sustainable buildings, Society, Social and Governance:

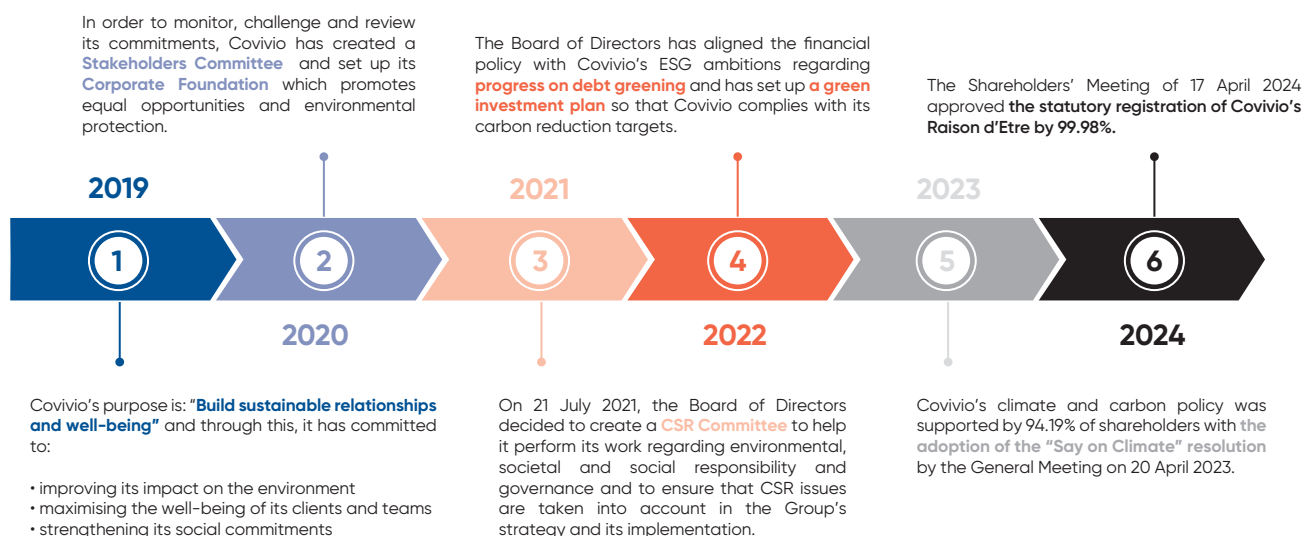
#### The four pillars of the Covivio Group's CSR strategy



Significant changes have been made with the support of the Board of Directors in recent years, enabling the CSR approach of Covivio and its subsidiaries to develop and strengthen.

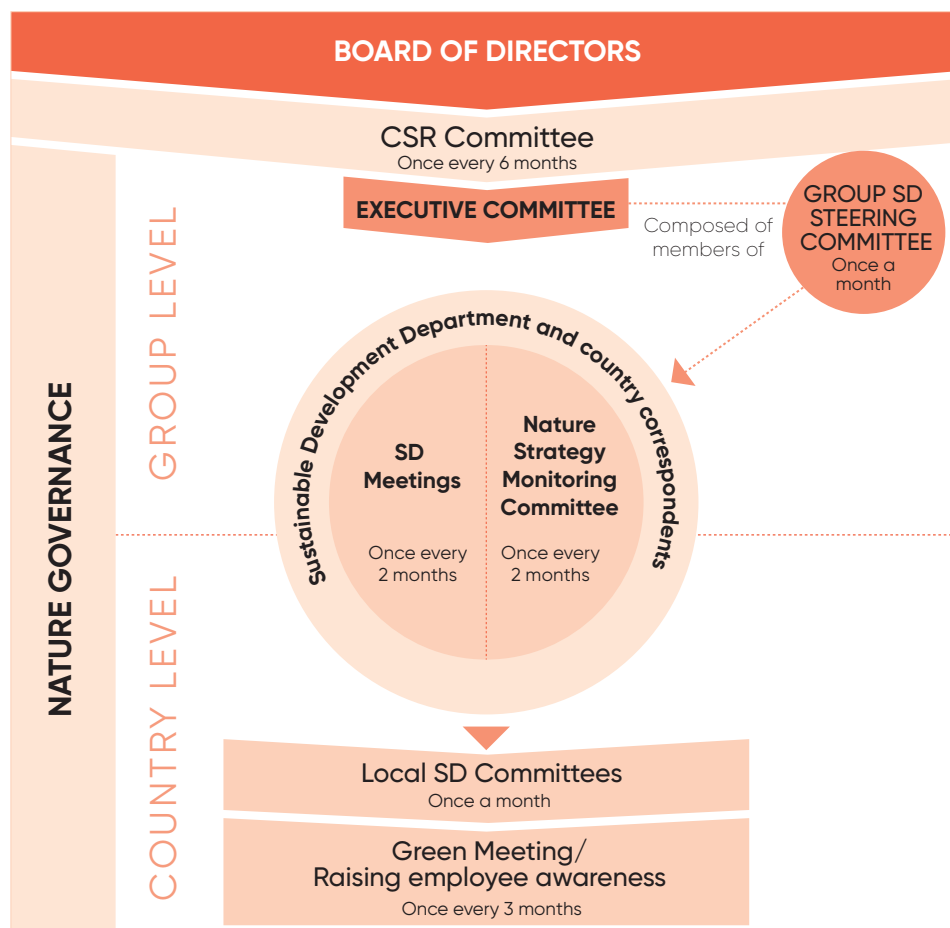


## Evolution of the Covivio Group's CSR governance



For many years, Covivio has made CSR an important component of its business model and development strategy, with a central role dedicated to the climate issue, which has now been extended to biodiversity through the definition of a holistic Nature strategy. Drawing on the CSR governance already in place, Covivio's Nature strategy is shared across the different levels of the company and covers all of the Group's activities. The diagram below shows all the bodies involved in monitoring sustainability issues and the associated ROID (risk, opportunity, impact and dependency) as well as their links to the main governance bodies, the Board of Directors and the Executive Committee.

## Governance of the Covivio Group's sustainable development strategy



The Innovation and Transformation Committee, which is not included in the diagram above, also contributes to certain cross-functional issues related to the sustainable development strategy. It comprises the Deputy CEO, the heads of Development, Asset Management, IT, Wellio (Covivio's co-working subsidiary), Innovation and Sustainable Development, as well as the Chief Transformation Officer.

### 3.1.2.2.2 A Board engaged in sustainability issues (GOV-1/2)

The Supervisory Board of Covivio Hotels approves the Group's strategic objectives, which in particular includes the multi-annual strategic objectives in terms of social and environmental responsibility, for which it is the guarantor. It oversees their implementation and places particular emphasis on monitoring CSR performance in conjunction with the Group's governance bodies. This Sustainability Report is approved by the Manager of Covivio Hotels. Furthermore, it was decided that Covivio Hotels' Audit Committee would review the audit methodology and approach, in the context of implementing the CSRD. The item was put on the Audit Committee's agenda for February 2025, when it was approved.

#### Information relating to the Board's consideration of CSR issues

<b>Percentage of Supervisory Board members with CSR expertise</b>	62%
<b>Demonstrated expertise in the field by at least one of the members of the Supervisory Board</b>	Environment: Nathalie Robin, Marielle Seegmuller, Olivier Estève, Christophe Kullmann, Céline Leonardi, Joséphine Lelong-Chaussier, Adriana Saitta, Yann Briand Social and societal aspects: Céline Leonardi, Yves Marque, Tugdual Millet-Taunay Governance: Emmanuel Chabas, Christophe Kullmann, Yves Marque
<b>Training for members of the Supervisory Board</b>	Covivio Hotels' Supervisory Board is mainly composed of representatives of the Covivio Group and its other institutional investor shareholders. All have implemented a sustainable development strategy within their structure aimed at reducing the environmental impact of their real estate portfolio. The training of the five members who hold positions within the Covivio Group is provided in the context of the Group's CSR strategy, which aims to train all its employees on these subjects. In addition, Christophe Kullmann and Olivier Estève participate in Covivio's CSR Committee meetings.
<b>Percentage of Board meetings with at least one CSR topic on the agenda</b>	100%, 4 meetings in 2024 The CSRD was included on the agenda of the meeting of 14 November 2024
<b>CSR topics on the agenda in 2024</b>	<ul style="list-style-type: none"> <li>approval of the non-discrimination and diversity policy, particularly with regard to the balanced representation of women and men on the governing bodies presented in the Supervisory Board's report on corporate governance;</li> <li>presentation of energy consumption and the certification of all assets in the portfolio;</li> <li>presentation of the new European standard for non-financial reporting resulting from the transposition of the European directive called the CSRD.</li> </ul>

The following information is intended to explain how the administrative and management bodies ensure that the objectives related to material impacts, risks and opportunities are defined, and how they monitor the progress made towards achieving them during the reference period, in relation to the IRO table presented in section 3.1.2.3.3.

#### CSR Committee

Covivio Hotels does not have a CSR Committee attached to its Board, however Covivio's CSR Committee has Group-wide scope. Its work therefore encompasses the activities of Covivio Hotels.

One session of the 2021 Board of Directors' meeting was devoted to the carbon trajectory. Following this, the Council decided to create a CSR Committee, which has since examined all CSR issues in detail. The CSR Committee, which comprises members of the Board of Directors, and is coordinated by the Executive Committee and independent experts, is responsible for validating and monitoring the implementation of the Group's CSR strategy, supporting the other bodies on these issues, guaranteeing the diversity and equality policy within the governing bodies, and reviewing, with the Audit Committee, the relevance and reliability of the sustainability information

reported. The Committee meets at least twice a year and systematically reviews the objectives and progress of the CSR strategy. The Committee's Chairwoman reports to the Board of Directors on the Committee's work after each meeting, i.e. at least twice a year. The CSR Committee, which is already mobilised on CSR and Climate issues, was involved at all stages of shaping the Nature strategy, reviewing the main results of the ROID studies on biodiversity (CSR Committee meeting of March 2023), as well as the objectives of the new Nature strategy (CSR Committee meetings of April 2024 and October 2024). Similarly to the carbon trajectory and the climate strategy, which have been on the agenda of every CSR Committee meeting since its creation (either directly, or via the taxonomy or via more specific studies such as the quantification of green Capex), the CSR Committee has systematically monitored the objectives relating to the other environmental dimensions of the Nature Strategy since the end of 2024.

The CSR Committee interacts with the Audit Committee on CSR risk factors, and with the Appointments and Remuneration Committee on determining relevant CSR criteria for executive remuneration. The members' qualifications are set out in Covivio's URD (ESRS 2, section 3.1.2.2.2).

### Shareholders' Meetings, a vehicle for sharing the CSR policy and the actions undertaken

Shareholders were informed at the General Meeting of 17 April 2024, of the objectives of Covivio's CSR policy, which has been commended several times by non-financial rating agencies, and of the progress made on these objectives in the 2023 financial year, focusing in particular on:

- the strategic priorities set up to achieve the goal of reducing the carbon trajectory by -40% between 2010 and 2030 aimed at:
  - favouring low-carbon developments;
  - reducing carbon emissions and energy consumption;
  - intensifying the use of renewable energy;
  - limiting water consumption.
- the real estate portfolio's environmental certification, which was 95% at the end of 2023;
- the complete renovation of the existing building at L'Atelier, the Company's European headquarters, which is the showcase of Covivio's ESG strategy and know-how;
- the 94% approval of the "Say on Climate" resolution by the General Meeting of 20 April 2023 and the proposal to include Covivio's Purpose in the Articles of Association submitted to the shareholders' vote;
- the strong societal commitment, through the support of the Covivio foundation in Europe as part of long-term partnerships.

#### 3.1.2.2.3 Involve managers and employees in implementing the strategy

The sustainable development strategy of Covivio Hotels is adapted from that of Covivio. It cannot be separated from the company's economic model. Its implementation is guaranteed by the support of a dedicated team, the Covivio Sustainable Development Department, in coordination with the Covivio Hotels teams.

#### Sustainable development

The Sustainable Development Department drives, deploys and coordinates initiatives within the various layers and activities of the Group, in direct contact with the General Management, Covivio's Board of Directors via the CSR Committee and the Sustainable Development Steering Committee. Cross-cutting across the entire Group, this team provides technical expertise to the different departments and divisions, playing a driving role in terms of strategic management, innovation, awareness-raising and CSR reporting. In 2024, Covivio Hotels also hired a specialised full-time consultant to set up a platform to monitor and model the greenhouse gas emissions of its assets. This task, in conjunction with the Sustainable Development Department, also aims to

create a pathway between the Group's climate strategy and its operational implementation with regard to assets and in relation to real estate operators. The Sustainable Development Department meets formally every two months in "SD Meetings" (Sustainable Development) to monitor how the CSR commitments are being implemented at Group and country level. Alternating with the SD Meetings, the Sustainable Development Department also meets once every two months within the Nature Strategy Monitoring Committee. Created in 2024, this body is dedicated to steering the new Nature strategy and supporting the deployment of its actions. According to the needs and the progress made, it convenes not only the team members but also the operational managers of the actions of the Nature strategy. This Committee is also a platform for sharing experiences and knowledge on Nature issues across the Group's various European entities.

#### Sustainable Development Steering Committee

The Sustainable Development Steering Committee is a forum for regular discussions between the Sustainable Development Department, represented by Jean-Éric Fournier (Sustainable Development Director) and the Executive Committee, represented by Christophe Kullmann (Chief Executive Officer (CEO)) and Yves Marque (Chief Operating Officer). It meets every month and provides an opportunity to report on progress made in implementing the various CSR action plans (including the Nature strategy), formalising certain decisions relating to its implementation, and sharing them with the Executive Committee and the Board of Directors. The Steering Committee is also a forum for discussion on studies and diagnostics associated with CSR issues, including Nature topics (ROID studies), as well as the associated strategic implications.

The Sustainable Development Department formally attended two meetings of the Covivio Hotels Steering Committee in 2024 to discuss the European taxonomy applied to the hotel industry, after the biodiversity objective came into force, and then for the CSRD, in order to validate the dual materiality matrix applied at the Covivio Hotels scope. A discussion channel has also been set up between the Sustainable Development Department, the Deputy Chief Executive Officer and representatives of the operating properties activity (in particular WiZiU).

#### Green Meetings

Green Meetings are bimonthly awareness and information meetings on sustainable development related to Covivio's business lines. Open to all Covivio employees, these meetings enable internal or external experts (design offices, associations, etc.) to present key or emerging topics for the Group: new labels, regulations, feedback on CSR-related projects, presentation of remarkable buildings, etc. The following topics were addressed in 2024 in connection with nature-related topics: protection of biodiversity illustrated by the example of the Atelier (Covivio's new European headquarters in Paris), circular economy and food, presentation of the 2024 Eco-challenge, progress of the Covivio for Climate (C4C) project. The Nature strategy will be the subject of a specific Green Meeting in early 2025.

### 3.1.2.2.4 Sustainability-related performance incentive schemes (GOV-3)

Specific criteria are included in the variable remuneration of executives and then implemented within the operational teams, in order to align the corporate strategy with the Group's CSR challenges. The CSR Committee determines a set of remuneration criteria for corporate officers, which are then allocated according to responsibilities. The Chief Executive Officer then applies them to the different departments and managers.

In 2022, the Board of Directors decided, on the proposal of the CSR Committee, to, in relation to the Long-Term Incentives for Covivio's Chief Executive Officer (CEO) and the Chief Operating Officer:

- increase the weighting of CSR criteria from 20% to 30%;
- apply the criterion of the feminisation of teams every other year, alternating with the criterion of the commitment of employees (based on the results of the Social Barometer), with each criterion counting for 15%;
- retain as another criterion, an environmental criterion, weighing 15%: the progress of the portfolio's environmental certification rate (as defined in the Sectoral Issues section), or, for the past two years, the progress of the carbon trajectory.

Thus, the remuneration policy for Covivio's executive corporate officers approved by the Shareholders' Meeting on 20 April 2023 now states that the weight of CSR criteria must represent 30% of long-term remuneration, with the criteria mentioned above.

Similarly, the CSR Committee proposed an increase in the weighting of the CSR criteria related to the annual bonus of corporate officers to the Remuneration Committee, which accepted this. Thus, 15% of Christophe Kullmann's 2025 bonus will be subject to the implementation of the green Capex plan, the achievement of a high level on certain non-financial ratings, the attraction and development of talent and the strengthening of the management team, and the setting of CSR objectives for the top 50 managers. Similarly, 15% of Olivier Estève's 2025 bonus will be subject to obtaining at least Gold or Excellent certification for 100% of the developments and alignment with the taxonomy, the BBCA label for 75% of operations in France and 50% in Germany/Italy, coverage of 100% of calls for tenders by the Responsible Purchasing policy and EcoVadis rating, and a circular economy approach for 100% of development projects.

CSR objectives are now systematically included in the criteria for calculating the variable portion of the remuneration of the members of the Executive Committee, starting with the Chief Executive Officer (CEO) of Covivio Hotels. The calculation of the variable compensation of the Chief Executive Officer (CEO), the Deputy CEO and the members of the Executive Committee includes targets related to the progress of Covivio's carbon objectives, the number of women in teams, the attraction and development of talents, the implementation of Green Capex programmes, the implementation of the Responsible Purchasing policy, etc. These targets are then assigned operationally to the Group's managers, according to their operational responsibilities, and are discussed during individual interviews. The ultimate goal is to give all Group managers at least one CSR objective tailored to their responsibilities.

## Variable remuneration of the Chief Executive Officer (CEO) of Covivio Hotels

### Proposal for variable remuneration to the 2025 Shareholders' Meeting (5.2.4.1.1.)

**Tugdual Millet-Taunay**  
**20% of annual fixed salary**

- (1) Achievement of the target of 100% of the portfolio certified by 31 December 2025
- (2) Achievement of the portfolio's annual operating carbon intensity objective (in kgCO<sub>2</sub>e/m<sup>2</sup>) in order to achieve the objectives of the CRREM 1.5°C scenario in 2030, i.e. 21.1 kgCO<sub>2</sub>e/m<sup>2</sup> in 2025 (or 2024 equivalent if 2025 data are not available at the reporting date)

### 3.1.2.2.5 Risk management and internal controls regarding sustainability reporting (GOV-4; GOV-5)

In 2021, Covivio updated its risk mapping at Group level, including all its subsidiaries and activities. The results were presented and shared with Covivio's Audit Committee. This was an opportunity to review the improvement in the level of control of the risks subject to specific action plans that have been defined and implemented, and to apportion the levels of control and the action plans put in place for the company's major risks. In 2018, the Sustainable Development Department, in coordination with the Risk, Compliance, Audit and Internal Control (ACI) Department, mapped out the CSR risks. This was validated by the Management Committee and enabled the inherent and residual risks associated with Covivio's activities to be identified. A risk mapping of procurement risks was then carried out in 2020/2021. The ACI carries out an annual risk review to ensure that these analyses are consistent and to report on how certain risks have changed in the overall mapping.

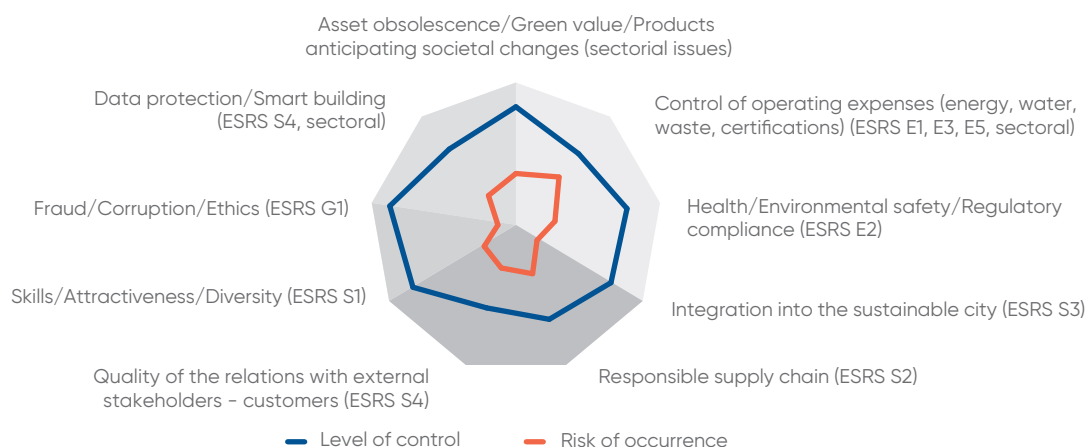
### CSR risk mapping

The CSR risk mapping was carried out as part of the process of compliance with the previous Directive on non-financial reporting and provided input for the work undertaken for the double materiality analysis. This study was conducted among a panel of French, German and Italian Covivio managers (including Covivio Hotels), in charge of operational or functional departments exposed to the identified risks. The first step involved a series of interviews conducted internally with this panel, in order to define the universe of CSR risks at the European level. The second stage involved rating the risks identified based on three criteria: reputation, frequency and level of control. The CSR mapping performed differentiates between:

- inherent risks, considered in absolute terms in view of Covivio's sector and activities;
- residual risks, assessed after taking Covivio's actions to control these risks into account.

The CSR risk mapping identified nine major risks. Subjects such as resilience and the topics of well-being and health are covered by several of these nine risks, which is why they do not appear separately.

## Summary of Covivio's CSR risks



This mapping was validated by the Executive Committee and shared by the Board of Directors.

The strategies for mitigating these risks are detailed in this report (see corresponding ESRS).

### CSRD-related developments

Covivio has made changes to its control procedures in line with the management of the implementation of the CSRD within the Group. Specific governance has therefore been applied and incorporated into the sustainability information verification process presented below. This organisation can be summarised as follows:

- **operational:** a monthly CSRD Steering Committee meeting comprising the Chief Operating Officer, the Risk and Compliance Director, the Accounting and Consolidation Director, the Hotels Director and the Sustainable Development Department, oversees the implementation of the CSRD.
- **supervision:** Covivio's CSR Committee, in consultation with the Board of Directors, establishes the Covivio Group's CSR strategy and monitors the CSRD's objectives and action plans;
- **validation:** the Supervisory Board of Covivio Hotels checks the accuracy of the CSRD information and reporting process;
- **verification:** the sustainability auditor (Ernst & Young & Autres in 2025 for 2024) checks the information and issues a limited assurance certification report.

### Control procedures

Covivio has had its non-financial reporting audited by an independent third party since 2012, and has therefore set up information reporting and internal control procedures. These procedures are reviewed and supplemented each year taking regulatory and market changes into account. They are drawn up in coordination with the departments involved (e.g. HR for procedures related to ESRS S1) and verified by the ACI before

being shared with all the interlocutors who contribute to producing indicators at Group level. The scope of action of the Audit and Internal Control Department covers all of the Group's activities. The general internal control, risk management and compliance policy and the relating organisation are detailed in Chapter 2 - Risk factors (ESRS GOV-1).

All the procedures are summarised in three documents as indicator reference sheets:

- the environmental reporting protocol;
- the social and societal reporting protocol;
- the protocol dedicated to the production of taxonomic indicators.

The social reporting protocol and the environment protocol were updated in 2024 to comply with the CSRD reporting requirements and are available on the Group's website. In addition to regulations, these protocols aim to provide a framework for the management system for sustainability issues and to ensure that practices are harmonised within the Group.

The Sustainable Development Department and its country and business CSR coordinators supervise data collection from the contributors for the activities concerned. It consolidates the data and carries out the appropriate consistency checks. Before publication, the data is validated by the various departments and verified by the sustainability auditor.

### Procedure for collecting and verifying sustainability information

The calculation of some indicators may require additional steps. This applies in particular to the energy consumption data for buildings, because of the early collection of data on 30 September (vs a single collection on 31 December for all other information).

## An example of consistency checks: the energy consumption of buildings

**The relevant Sustainable Development manager must conduct preliminary checks when they receive the consumption from a contributor.**

- Changes: variations (+/- 20%) compared to the previous year (N-1) must be justified by a comment or a new request must be sent to this effect.
- Consistency: checking the presence of fluids declared in N-1 vs N and *vice versa*, validation to be requested if new or absent fluid.
- Comprehensiveness: complete data for the period concerned or estimates made in accordance with the reporting protocol and clearly stated as such in the table (estimates are not made directly by the contributor).
- Control: the manager performs a double check for data in the operational scope using the supervision systems when they are operational.

**Once these checks have been performed, the table is sent to the Sustainable Development consolidator, who carries out a new control before sending it for external verification.**

- Comments are provided for the cases listed (variations, consistency, completeness, control).
- Control of abnormal intensity levels (+/- 20%) compared to the asset class.
- Control of parameters and formulas (climate adjustments, primary energy conversion factors and CO<sub>2</sub>).
- Assets are excluded from the scope if there is insufficient evidence (thereby impacting the coverage rate).

### External audit of sustainability information

The audit process is detailed in the sustainability auditor's report presented in section 3.6.1. It is broken down into three successive levels, according to the materiality of each data point:

- level 1: verification of the consistency of the sustainability report;
- level 2: Group level interviews, analytical review and consistency tests of quantitative indicators;
- level 3: interviews at the activity level and detailed tests on the reliability of data based on samples and consolidation.

### Due diligence

Covivio Hotels is not subject to the due diligence obligation under the French Duty of Care law of 2017. Nevertheless, the Group has adopted vigilance measures throughout the life cycle of the building: purchase, management, renovation, deconstruction or sale, etc. Those responsible for each of these steps must comply with the procedures attached to the operations to be carried out. For example, in the case of an acquisition, the Asset and Property Management Department carries out an analysis of the available documentation during the due diligence phase in coordination with the support services (Environment, Legal, Sustainable Development, etc.). Its purpose is to obtain the necessary guarantees for acquisitions. The environmental risks are therefore assessed by examining this documentation, which is supplemented where necessary by additional investigations (security, connectivity, digital, taxonomy, etc.), and their estimated short-or long-term impacts in order to assess potential remediation costs. These diagnoses and studies are then monitored. A similar process is organised during a sale of assets, in order to make the necessary data accessible to the buyer. Suppliers are also monitored during the building's operational period and are assessed using the process developed with EcoVadis (ESRS S2, section 3.3.2.5).

### 3.1.2.3 A sustainable value-creating business model (SBM)

#### 3.1.2.3.1 Assert a role as a responsible real estate operator (SBM-1)

With 283 hotels in the portfolio, located in 12 countries with a value of €6.4 billion at the end of 2024, Covivio Hotels is the partner of choice of 17 hotel operators in Europe (AccorInvest, IHG, NH Hotel Group, B&B Hotels, etc.).

Covivio Hotels is equipped to support brands in their lease, operating properties and development projects, and is a trusted partner in the most dynamic cities (London, Paris, Amsterdam, Florence, Rome, Berlin, etc.). Covivio is thus helping to renew the hotel offering in Europe by identifying the most ground-breaking concepts, initiating partnerships with new entrants or leveraging the repositioning of its hotels in its portfolio to provide a hotel offering that is increasingly tailored to their markets and travellers' expectations. All of this is geared towards improving the environmental performance of the hotels, in line with the Group's CSR strategy.

Covivio Hotels manages its hotel portfolio via two main management methods: as leases or as operating properties.

**Hotel Lease Properties** represent 62% of the portfolio and the remaining fixed term of the leases is 11 years on average. The portfolio is let mainly to AccorInvest (20%) in France and Belgium and consists of economy (Ibis) and midscale (Novotel, Mercure) hotels. In the United Kingdom, Hotel Lease Properties are let to IHG (13% of the hotel portfolio). Lastly, the other Hotel Lease Properties are let to B&B, NH Hotels, Motel One, Barcelo, Hotusa, etc. under long-term leases.

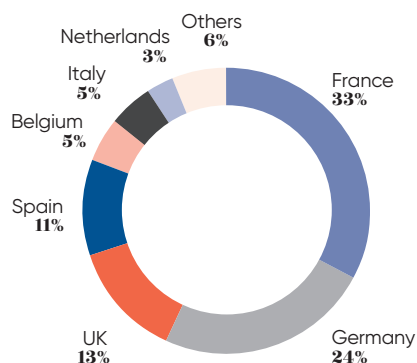
**Hotel Operating Properties** (38% of the hotel portfolio) are mainly located in Germany (particularly in Berlin), France and Belgium.



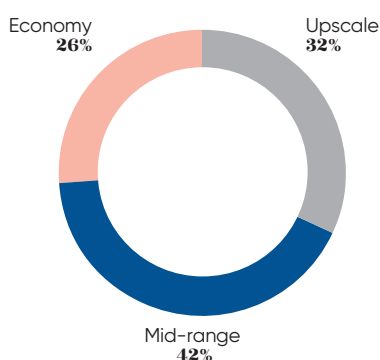
#### Covivio Hotels activity

- **283 hotels**
- **39,500 rooms**
- **€6.4 billion** hotel portfolio in Europe (€5.8 million Group share)
- **12 countries**
- **90% of hotels located in major European cities**
- **17 partner hotel operators:** AccorInvest, IHG, B&B HOTELS, NH Hotels, Motel One, Barcelo, Radisson Hotel Group, Marriott, etc.

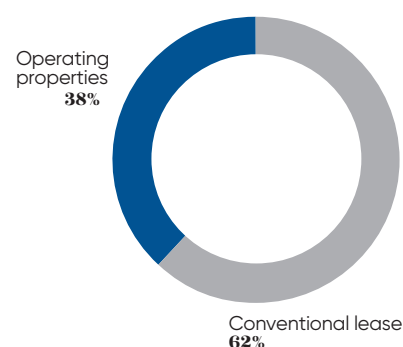
#### A presence in 12 countries in Europe:



#### A wide range of hotels:

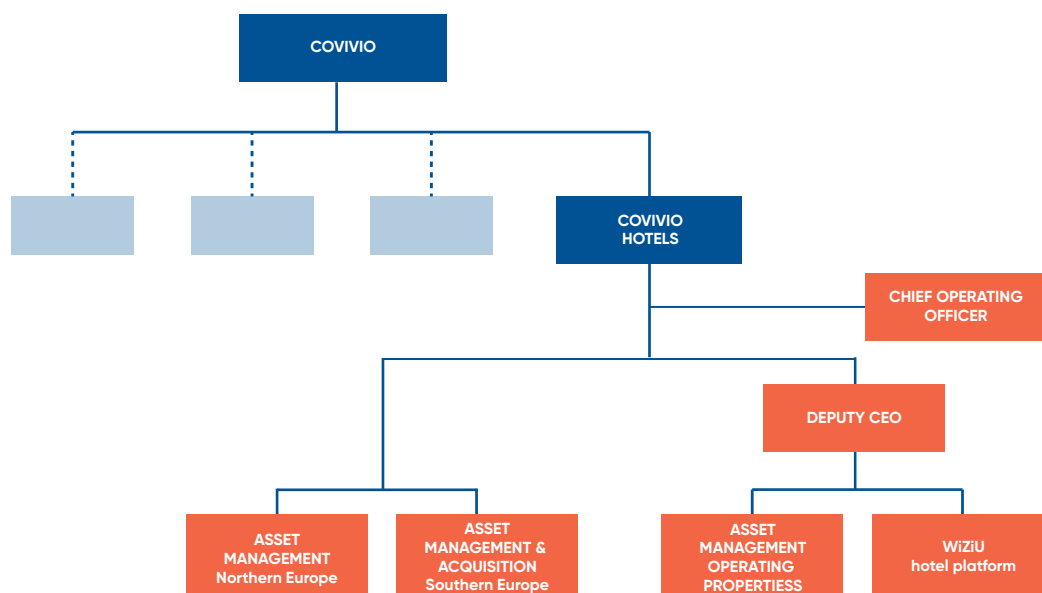


#### A diversified profile:



**90%** of the portfolio located in the main tourist destinations

#### Covivio Hotels' organisation chart and positioning within the Covivio Group





## A long-term strategic vision

Covivio's business involves investing to hold real estate assets, while developing and renovating buildings. Covivio is constantly striving to improve the technical, environmental, service and financial performance of its portfolio. Its business model is based on a long-term vision, organised around three pillars:

- **central location:** a strong presence in the centre of Europe's major capital cities and main business and leisure centres, offering good market depth and attractive economic prospects;
- **hospitality:** assets and an offer modelled on new concepts, designed to keep pace with urban transformation and the new demands from customers. The aim is to facilitate "nomadism" and teleworking in a context where the boundaries between work and personal life are blurring;
- **sustainability:** a commitment to the climate transition for a sustainable and resilient city, by placing CSR at the heart of the business model in order to accelerate the company's transformation.

From the mindset of an investor and real estate asset manager to the mindset of an asset manager and hotel operator, with a focus on creating value.

### A unique positioning for a REITs

- **A major player in hotel investment:** by favouring the best real estate investments in the hotel sector in Europe, while diversifying its modes of intervention (Hotel Lease Properties, Hotel Operating Properties) whilst continuing to support the development of tenant operators.
- **A forerunner in the renewal of the European hotel offering and experience:** by identifying the most innovative lifestyle concepts (Zoku Meininger, Anantaran Kimpton, etc.), while reworking and repositioning its existing portfolio due to an active asset & brand management policy.
- **Creator of a local and bespoke hotel experience:** the aim today is to adapt to the specific characteristics of the building, its environment and its customers. Covivio Hotels aims to offer its customers a unique experience in each city based on a personalised approach: in one city, local cooking classes will be offered, while in another, guided tours of the city's most beautiful sites will be available.

### Towards a more responsible hotel industry

Covivio Hotels has taken up the challenge of the hotel sector, i.e. maintain its quality standards and satisfy its customers' expectations while reducing its carbon footprint:

- at the end of 2024, 97.5% of the hotel portfolio was environmentally certified and the target is 100% by the end of 2025;

- a 53% reduction in carbon intensity between 2010 and 2024, consistent with the 1.5°C scenario of the CRREM/SBTi trajectory;
- Covivio Hotels gets its hotel partners involved in a joint and virtuous approach to reducing their carbon footprint: a collective objective.

The means deployed by Covivio Hotels to reduce the carbon footprint of its assets:

- a precise diagnosis is carried out on each hotel to identify the levers for improving energy performance, in order to optimise their operation and to consider, if necessary, a programme of works;
- support for tenant operators and managers, in order to train staff in the most virtuous practices possible and raise customer awareness;
- capitalise on the Group's experience in Sustainable Development deployed in offices and residential, by identifying and disseminating best practices among its hotel partners.

In 2024, the hotel operating properties activity underwent a further expansion with the reorganisation of the ownership of hotel operating properties and businesses for a total exchange value of nearly €800 million. At the end of this operation initiated at the end of 2023, Covivio Hotels and its partners now holds the freehold title to 43 hotels located in France, Belgium and Germany and have transferred 16 hotels located in the same territories to AccorInvest.

### WiZiU, Covivio's hotel management platform

WiZiU's mission is to manage hotels owned by Covivio Hotels in France and Belgium, and which are operated directly or through franchise agreements with prestigious operators - Accor, Hilton, IHG, Marriott. WiZiU is involved in all stages of a hotel's management and operation.

WiZiU's conviction: the alignment of interests between stakeholders (teams, customers, operators, partners and owners) is the best lever for value creation.

By the end of 2024, WiZiU had 24 hotels, with a total of over 3,100 rooms in Lille, Le Touquet, Nice, Rouen, Antwerp, Bruges, Brussels, Ghent and Leuven. WiZiU's ambition is to support the repositioning of these hotels through rebranding and an investment programme.

The platform believes that people are the cornerstone of the hotel sector and its professions. WiZiU flourishes from encounters, teamwork and dialogue with all those who contribute to the life of its hotels. This collective spirit, and this dynamic approach to the hospitality industry are in WiZiU's DNA.



# A sustainable value-creating business model

## A DIVERSITY OF CAPITAL



### FINANCIAL

- **€6.4 BN** portfolio of which > 90% in central locations, in the heart of major European cities
- **€84 M** of investments contributing to a climate objective of the taxonomy
- **100%** green bonds (**€4.1 BN**)
- **40.8%** debt ratio under control

Financial stability

Investments

Liquidity



### HUMAN RESOURCES

- **~1,500** employees in hotel operating properties
- **48%/52%** male/female ratio
- **93%** employees trained
- Maintaining a good quality of life at work

Talent retention

Skills

Attractiveness



### INDUSTRIAL

- Renovation measures on the existing portfolio
- Development of a complete Group-wide offer: **Work - Travel - Live**

Asset management

Infrastructure

Facilities



### RELATIONSHIP

- Long-term relationship of trust with an average lease term of 11 years and with 17 partner hotel operators
- Development of **partnerships** with local authorities and organisations

Responsible procurement

Long-term relationship

Partnerships



### NATURAL

- Strategy of **improving environmental performance** of the portfolio (energy, carbon, water)
- Deployment of the Nature strategy at Group level

Climate strategy

Biodiversity

Resilience



### INTELLECTUAL

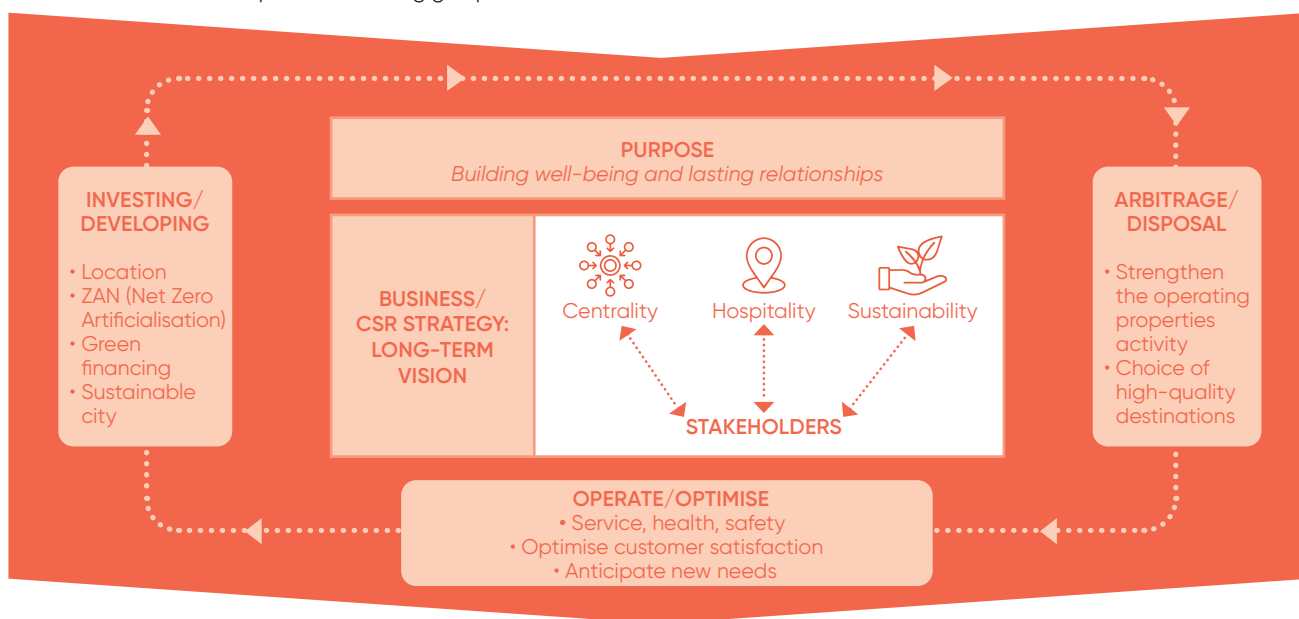
- **Expertise** in real estate, financial and technical matters
- Fight against obsolescence
- Innovation and smart building (digital strategy)
- Participation in working groups on low-carbon innovations

Innovation

Research

Expertise

## BUSINESS ACTIVITIES



### ECONOMIC VALUE

- **€263 M** rent received
- **€83 M** income from operating hotels
- Taxonomy: **32%** of revenues aligned (real estate scope)



### SOCIAL AND SOCIETAL VALUE

- **3%** of the payroll allocated to skills development (training - France ESU)
- **€1.7 M** over 5 years allocated to the Covivio foundation
- **17,000** jobs supported thanks to the Group's activities
- **22** charities supported by the Foundation to fight for equal opportunities



### ENVIRONMENTAL CONTRIBUTION

- **97.5%** of hotels certified
- **14%** decrease in energy consumption between 2019 and 2024
- **24%** reduction in water consumption over the same period

## VALUE CREATED

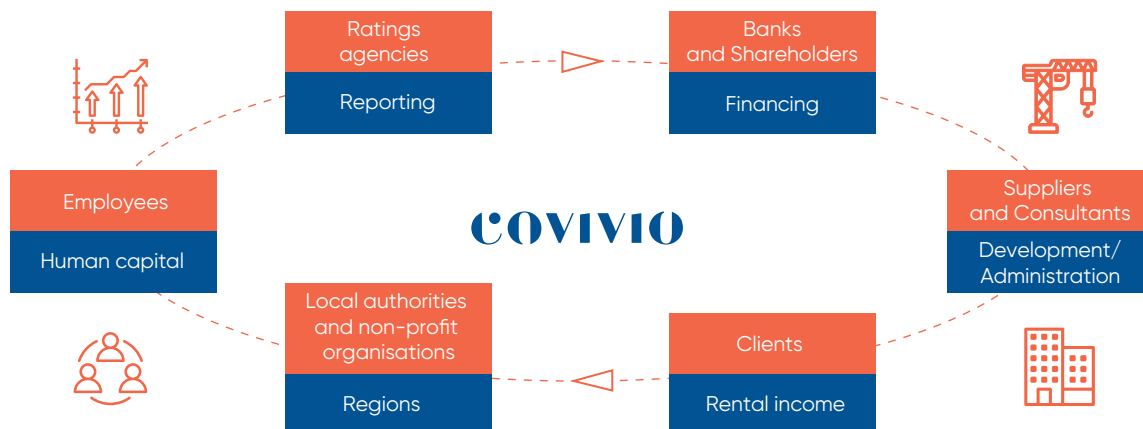
### 3.1.2.3.2 Involving stakeholders (SBM-2)

#### A driving force at the heart of the sector

The building and real estate sector covers an extremely diverse range of professions and expertise, each contributing to the activity of the others: architects, technical design offices, local authorities, surveyors, bankers, suppliers, marketers, legal professions, operator and end customers, investors, associations, the media... and of course employees.

Covivio is at the heart of this network of relationships. The Group, which is aware of its economic weight and its leading role, strives to set an example in how it manages its business activities and, especially, in its relationships with its different stakeholders. Covivio works with and listens to its different stakeholders, co-inventing real estate solutions that meet their expectations.

#### Covivio's positioning in the building/real estate sector



#### Meeting stakeholder expectations

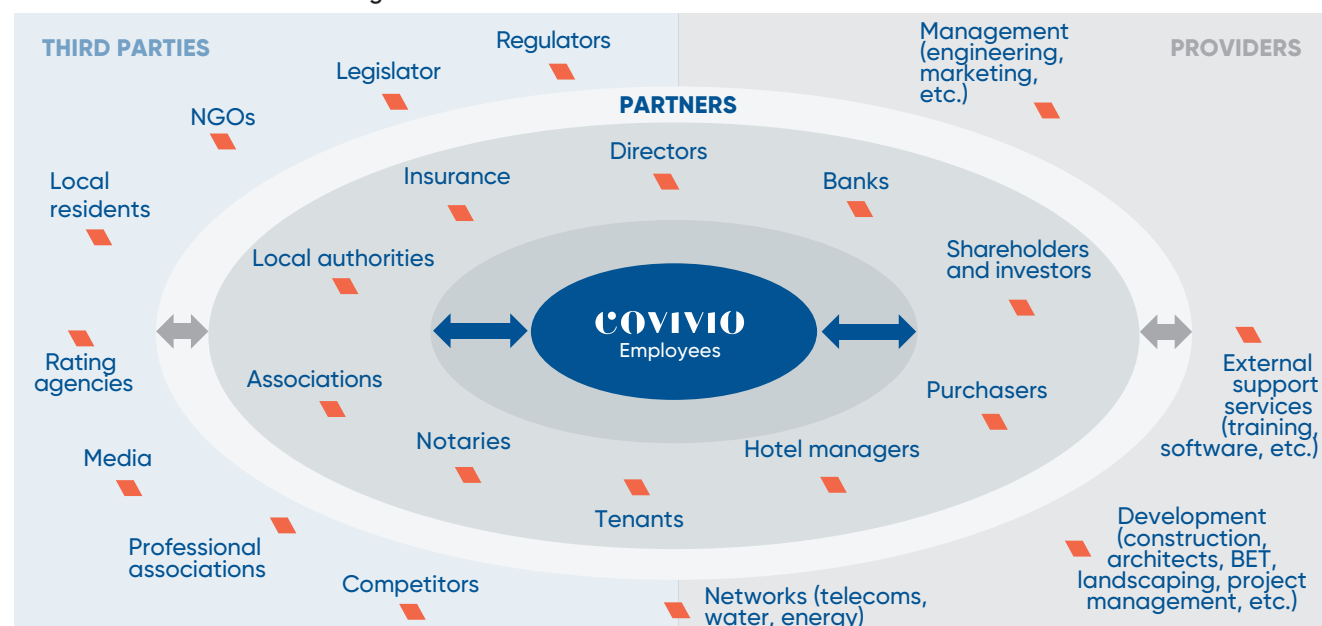
The mapping of the Group's stakeholders since 2010, has enabled their expectations to be more effectively taken into account and a materiality matrix to be produced. The main stakeholders were selected from:

- the commercial community (key account tenants, suppliers);
- the financial community (shareholders, banks);
- human capital (managers, employees);

- public authorities (local authorities);
- civil society (associations, media).

Interviews with these internal and external stakeholders enabled their expectations, constraints and challenges in terms of CSR to be better identified. These issues have been prioritised according to their importance and their impact on the company's activities, resulting in the map below and the introduction of appropriate dialogue tools. They were re-examined when the Group's Purpose was defined in 2019.

#### Covivio Hotels' stakeholders throughout the value chain



Because of the diversity of the main stakeholders identified and their expectations, Covivio has gradually set up a specific communication for each one. The Group uses a variety of internal and external communication methods to do this, in particular via social networks: tenant extranet, X, LinkedIn, Yammer, etc.

#### Adapted communication methods

Main stakeholders	Stakeholder expectations	Communication method	Chapter
<b>Hotel operators</b>	Co-construction of innovative "tailor-made" solutions to best support each individual's real estate strategy	Sustainable Development Partnership Committees	ESRS S4
<b>Shareholders</b>	Visibility and sustainability of the business model and profitability	Letter to shareholders, press releases, financial releases, road shows, investor days, website, etc.	Chapter 6
<b>Rating agencies</b>	Transparency of financial and non-financial communications	Universal Registration Document, Sustainable Performance Report, Nature Report	3.2.6
<b>Employees</b>	Professional career monitoring, training	Intranet, internal communication tools	ESRS S1
<b>Local authorities and associations</b>	Consideration of their socio-economic issues	Sustainable performance report, Nature report Participation in various collaborative projects, conferences, etc.	ESRS S3
<b>Suppliers</b>	Fair practices	Responsible Purchasing Charter Evaluation system via EcoVadis	ESRS S2

#### Stakeholders Committee

When it defined its Purpose, Covivio decided to create a Stakeholder Committee for the Group's governance bodies in order to take stakeholders' interests into account in a more regular and structured way. Its purpose is to engage in long-term reflection on Covivio's future challenges and their inclusion in the strategy. Its goals are to involve stakeholders in the design process for the products and services developed by Covivio, to keep track of major changes and long-term trends, and to compare viewpoints to ensure that these changes are incorporated into the Group's development projects and strategy. This work focused on the rupture of the social bond, giving a place in the city to the most vulnerable, practical ways of creating diversity and a sense of community, and giving city dwellers the chance to relax. A report on this Committee's work was given to Covivio's Board of Directors and a summary of its work (link) was published in 2024.

### 3.1.2.3.3 Resilience of the business model (SBM-3)

Positioning in the value chain: ⇐: upstream/□: direct transactions/⇒: downstream

Time horizon: ST: short term/MT: medium term/LT: long term

■: material

□: non-material

Topics	Positioning in the value chain			IRO	Description	Time horizons			Reference	Materiality
	⇐	□	⇒			ST	MT	LT		
E1 - Climate change adaptation	■	■	■	Impacts	Contribution to exacerbating the effects of climate change, particularly with air conditioning equipment and/or the soil artificialisation. In the event of misadaptation, the impact on people's safety and well-being can be severe. Positive impact: participation in urban resilience at the regional level, for example by countering the effects of urban heat islands.	■	■	■	3.2.1.1.11	■
				Risks	Physical risk related to the occurrence of a natural disaster. Financial risk related to the obsolescence or devaluation of certain assets and increased insurance costs.					
				Opportunities	Strengthening portfolio resilience.					
E1 - Climate change mitigation	■	■	■	Impacts	Strong sectoral impact: the building sector represents 28% of French emissions. Positive impact: contribution to the energy renovation of the portfolio.	■	■	■	3.2.1.1.11	■
				Risks	Risk to the attractiveness of the buildings, especially due to increased expenses for customers. Risk to the liquidity of the asset in a regulatory context encouraging energy-efficient buildings. Significant financial and reputational risk in the event of a class action lawsuit for inaction on climate change.	■	■	■		■
				Opportunities	Liquidity of assets. Strengthening competitiveness.					
E1 - Energy (consumption, supply, renewable energy)	□	■	■	Impacts	The building sector accounts for 43% of national energy consumption. The impact on the environment for a REITs can be significant if the building is energy-intensive and uses fossil fuels. Positive impact: contribution to the energy renovation of the portfolio.	□	■	■	3.2.1.1.11	■
				Risks	Financial risk related to the increase in energy costs and the cost of aligning and implementing new regulations if they have not been anticipated (tertiary decree, RE2020 and European equivalents).					
				Opportunities	Liquidity of assets. Strengthening competitiveness.					
E2 - Pollution of air, water and soil	□	■	■	Impacts	The impact for human well-being is high in the sector. Potential impact on the environment during construction operations. Positive impact: soil remediation in the context of development operations.	■	■	□	3.2.2.1	□
				Risks	Risk of environmental pollution (particularly water) on buildings or development projects limited in relation to the Group's activities. Financial risk (costs of precautionary measures to avoid infiltration, any clean-up and fines in the event of pollution).					
E2 - Use hazardous substances	□	■	■	Impacts	Potential impact related to phytosanitary products and asbestos. The Covivio Hotels portfolio is mainly urban. Nevertheless, when spaces require maintenance, the use of phytosanitary products is very limited.	■	■	□	3.2.2.1	□
				Risks	Reputational and legal risk combined with a health risk from using phytosanitary products.					
				Opportunities	Creation of ecological continuities in respect of nature.					

Topics	Positioning in the value chain			IRO	Description	Time horizons			Reference	Materiality
	←	□	→			ST	MT	LT		
<b>E3 - Water (consumption, supply)</b>	■	■	■	<b>Impacts</b>	Pressure on available resources. The use of water is omnipresent in the hotel business (showers, catering, swimming pools) and is increasing as hotels upscale.				3.2.3.1	■
				<b>Risks</b>	Physical risk: flooding, rising water levels. Business continuity risk in the event of restrictive measures. Risk of image: hotels, particularly with swimming pools, may be targeted by the media and associations during water restriction periods. Financial risk, an average 10% increase in the price of water in France in 2023.	□	□	■		
<b>E3 - Marine resources</b>	■	■	■	<b>Impacts</b>	The impacts are mainly related to catering for the hotel business: supply of fish, shellfish. The abstraction of groundwater is not significant for Covivio Hotels.	□	□	■	3.2.3.1	□
				<b>Risks</b>	Reputational risk and fines (fairly limited). Financial risk related to the increase in costs (hospitality) with the implementation of responsible sourcing.					
<b>E4 - Biodiversity policy and actions</b>	■	■	■	<b>Impacts</b>	The impact of Covivio Hotels is not insignificant: - land use is the pressure to which Covivio contributes the most, mainly through the purchase of construction materials, but also through its existing portfolio; - hydrological disturbances and ecotoxicity related to the supply and use of raw materials for improvements and renovations as well as the electricity consumption of tenants; - GHG emissions, for the same reasons. Positive impact: use of the portfolio's green spaces to contribute to ecological continuity or to bring biodiversity back to city centres (based on ecological diagnostics), mainly on large land sites.	■	■	■	3.2.4.1.3	■
				<b>Risks</b>	The financial risks are difficult to quantify and can be localised at project level: preventive measures, compensation up to and including the risk of refusal of planning permission. Significant reputational risk.					
<b>E5 - Waste management &amp; Circular economy and management of resources and materials</b>	■	■	■	<b>Impacts</b>	Operational component: Waste management is a major issue in the hotel sector (particularly for catering). Development component: Strong impact of the construction sector on waste production (46 million metric tons of waste generated by the construction industry (excluding public works), i.e. 1.5 times the production of household waste in France). Only 40 to 60% are recovered. The impacts are mainly related to the renovation activity of Covivio Hotels. This means that the circular economy must be taken into account throughout the project. Positive impact: participation in the development of the circular economy sector.	■	■	□	3.2.5.1	■
				<b>Risks</b>	Operational component: The financial risk is limited, although there is an increase in the cost of waste management. The risk to business continuity in the hotel industry is solely related to external factors (e.g. strikes by refuse collectors). This risk is heightened in the hotel sector, with an even greater reputational risk because of the commercial aspect. Development component: Financial risk difficult to estimate but the risk of difficulty in supplying certain resources (timber) can delay projects and increase costs. Reputational risk at project level: revaluation becomes a key element, including in the communication of companies in the sector.					

Topics	Positioning in the value chain			IRO	Description	Time horizons			Reference	Materiality
	←	□	⇒			ST	MT	LT		
S1 - Working conditions	□	■	□		<b>Impacts</b> Impact on labour relations in the event of operational organization difficulties (management of working hours, workload, absenteeism). Impact on employee health/safety related to working environments that can be demanding at times, and to stress at work. Impact on the well-being of affected employees. Limited impact at Covivio Hotels level due to its direct activities and its commitments to equal opportunities. Impact on Human Rights: limited in terms of frequency but could be significant in terms of employee well-being if it occurred (in relation to the personal data protection aspect).	■	□	□	3.3.1	■
					<b>Risks</b> Working conditions: Health/Safety risk: workplace accidents (falls, cuts, burns in the kitchen)/occupational illnesses and financial risk: cost of additional recruitment. Equal opportunities: Possible risk of loss of skills and know-how in the event of high turnover or low ability to attract, retain and develop talent and Financial and reputational risk: in France, the maximum fine for discrimination is €45,000 (and 3 years' imprisonment). Human rights: Financial and/or reputational risk: growing demand from investors and rating agencies.					
					<b>Opportunities</b> Business continuity. Employer brand.					
S2 - Working conditions and respect for Human Rights in the value chain	■	■	■		<b>Impacts</b> Maximum impact on the well-being and health/safety of people on construction sites. Impact on Human Rights, particularly with certain precarious jobs (part-time, temporary contracts, temporary work).	■	□	□	3.3.2.1.3	■
					<b>Risks</b> Limited criminal risk in the construction activity because criminal liability lies with the contractor. Significant reputational risk in the event of an accident on one of the construction sites or in an operational site. Criminal risk in the event of discrimination or human rights violations.					
					<b>Opportunities</b> Relationship of trust with suppliers; brand appeal; reputation.					
S3 - Societal involvement - integration in the sustainable city	□	□	■		<b>Impacts</b> Impact mainly related to hotel operations. Positive impact linked to contributing to boosting the local economy and regenerating districts.	□	■	■	3.3.3.1.3	■
					<b>Risks</b> Risk to business continuity: community integration and integration into the ecosystem is essential, particularly in the context of renovation projects. Risk of asset obsolescence due to poor accessibility (PRM and public transport). High reputational risk, plus the risk of the project not being completed.					
S3 - Rights of indigenous peoples	■	□	□		<b>Impacts</b> The main impact is a supplier's failing to respect the rights of indigenous peoples, particularly with regard to the extraction and production of raw materials.	□	□	■	3.3.3.1.3	□
					<b>Risks</b> Reputational risk in the event of an incident occurring on Covivio's value chain.					
S4 - Information for customers and end-users	□	■	■		<b>Impacts</b> Direct impact on customer satisfaction, who may consider Covivio Hotels responsible for the failures.	■	□	□	3.3.4.1.3	■
					<b>Risks</b> Financial risk related to data protection (GDPR sanctions up to 4% of a company's revenues in the event of a breach). Reputational risk: the principle of Name and Shame in the event of GDPR infringement.					
					<b>Opportunities</b> Long-term financial stability.					



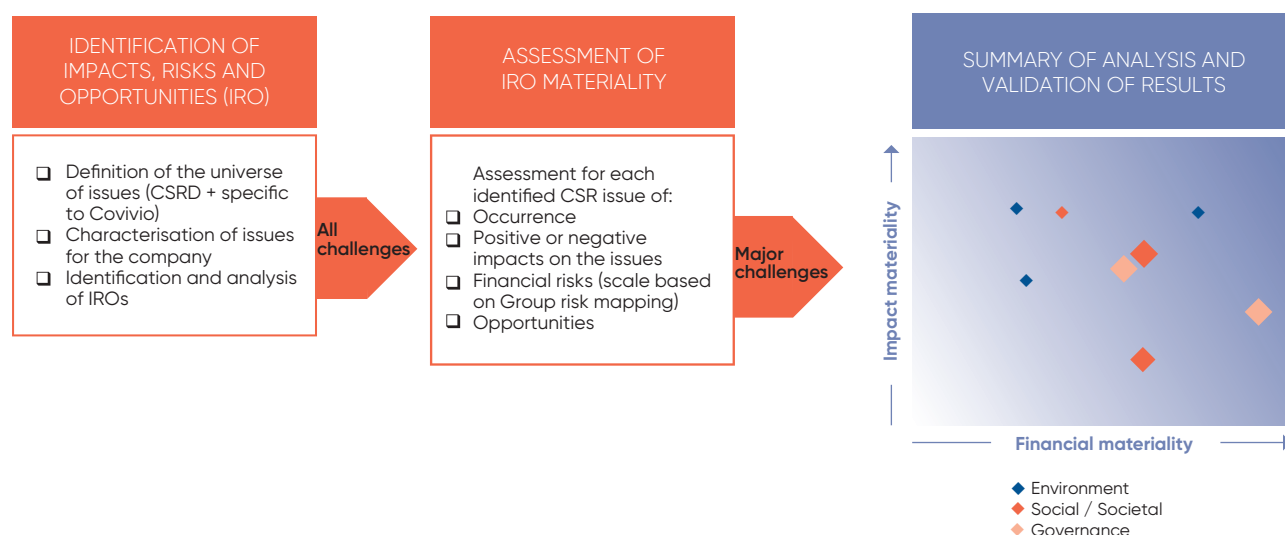
Topics	Positioning in the value chain			IRO	Description	Time horizons			Reference	Materiality
	←	□	→			ST	MT	LT		
S4 - Customer and end-user safety	□	■	■	Impacts	The impact on the health of occupants has become a major topic since the Covid pandemic in 2020. Direct impact on customer satisfaction, who may consider Covivio Hotels responsible for the failures. Positive impact: contribution of the well-being to occupants.	■	□	□	3.3.4.1.3	■
				Risks	Risk of building security or asset resilience defects, resulting in an inability to manage major crises that could cause an incident, accident or health risk, or even engage the company's liability.					
				Opportunities	Long-term financial stability.					
S4 - Social inclusion of customers and end-users	□	□	■	Impacts	Impact on the well-being of employees and/or customers with disabilities if hotel buildings and services are not optimised to cater for all users.	■	□	□	3.3.4.1.3	□
				Risks	Financial risk: Accessibility topics are well covered in Covivio's countries of operation. Nevertheless, the process of bringing certain hotels into conformity is complex.					
				Opportunities	Long-term financial stability.					
G1 - Business ethics	□	■	□	Impacts	The impact of late payments for suppliers is significant and leads to business failures: one in four bankruptcies at VSEs is caused by late payments. It also creates employment tensions with domino effects.	■	□	□	3.4.2.1	■
				Risks	Risk to the relationship of trust with stakeholders who could consider the company to be an at-risk partner in the event of confirmed corruption. Reputational and financial risk, or even a curb on the development of activities in the event of a breach of the profession's code of ethics and the Group's internal regulations.					
				Opportunities	Identification of Covivio as a reliable player.					
Sectoral challenges - Fight against building obsolescence	□	■	□	Impacts	The impacts are mainly related to the environmental performance of the real estate portfolio, which may have an effect on the environment and the well-being of customers.				3.1.3.2	■
				Risks	Financial risks: holding assets with low potential for value creation; loss of attractiveness of the portfolio or additional cost of work; competitive disadvantage due to lack of certification or unattractive locations; cost of additional certifications and labels to meet market expectations.	□	■	■		
				Opportunities	Liquidity of assets. Reputation.					

### 3.1.2.4 Identify and manage sustainability-related impacts, risks and opportunities (IRO)

#### 3.1.2.4.1 Identification and assessment of material issues (IRO-1)

Building on the work carried out to date, in particular the risk mappings (3.1.2.2.5) and the materiality matrix published in previous fiscal years, Covivio carried out a double materiality analysis using the methodology presented below. This analysis was developed at Group level and covers all activities and the value chain.

#### Double materiality analysis methodology



#### Preparatory work and defining the universe

Before the issues were rated, preliminary work was performed to define the universe of issues based on the CSRD's list of issues. This work was based on both internal and external documentary research.

- Internally, the analyses and work conducted up to 2024 helped to shape the framework for defining the issues, including:
  - the results of the materiality analysis published up to the previous financial year;
  - risk mapping: Group, CSR, purchasing/CSR, cyber, corruption. This work was particularly important for the development of Covivio's general risk profile;
  - previous reporting from both a social and environmental standpoint, with significant historical data;
  - studies commissioned by Covivio: MSCI Climate Value at Risk, WRI Baseline Water stress, mapping of protected areas, costing of carbon trajectory-related investments, Global Biodiversity Score, socio-economic impact;
  - the policies implemented: Responsible Purchasing, Diversity Charter, Ex-Aequo, Nature strategy, etc.
- Externally, Covivio has drawn on the work of the European Commission, ADEME, INSEE, the OJD (notably via the Responsible Real Estate Barometer) or international organizations such as WRI, ENCORE or CDP.

This work has resulted in the identification of a universe of 20 issues based on the 10 topical ESRS and one additional issue to cover sectoral topics not covered by the regulations. These issues are detailed in the matrix presented in 3.1.2.4.2.

#### IRO rating methodology

The rating methodology was developed in accordance with the principles of the CSRD and based on previous risk maps produced with the support of the Audit and Internal Control Department.

Rating sub-criteria have been defined to assess firstly the impact (impact materiality) and secondly the level of risk and opportunity (financial materiality). Each rating (on a scale of 1 to 4) is then weighted by the frequency of occurrence according to the probability of occurrence within a given time horizon (generally three years except for certain risks requiring a longer analysis horizon such as climate). Risks are rated as gross risks, before any risk control measures.

## Sub-criteria used

		Criteria rated from 1 (low) to 4 (critical)
Impact materiality	Extent and irremediability	Physical and/or psychological well-being
		Fauna, flora, environment
		Competitors' markets and operations
	Importance	Single event or impact on society as a whole
Financial materiality	Financial risks	Impact on revenues or asset value
	Reputation/Image	Media interest and risk of negative publicity
	Business continuity	Risk of interruption of one or more activities
	Involvement of top management	Level of management involved in risk management

## Rating of issues

In order to simplify the rating of the issues, various workshops were held with all the Group's departments, which also enabled the teams' awareness of the CSRD to be raised. These workshops mobilised nearly forty Group managers, involving governance with six members of the Executive Committee represented during the workshops and the majority of local ROCs. As the previous materiality analysis had involved external stakeholders and the different departments involved working with the Group's external stakeholders (investors, customers, suppliers) on a daily basis, it was not considered necessary to involve them in this new rating exercise. Nature was also taken into account as a silent stakeholder.

These workshops, organised between the last quarter of 2023 and the beginning of 2024, were held as follows:

- presentation of the context and purpose of the CSRD;
- presentation of the concept of dual materiality and the methodology for rating issues;
- presentation of each issue illustrated by the documentary research already carried out and invitation of participants to discuss risk levels;
- consolidation of the scores, which were sent to the participants for review before validation and consolidation at Group level.

This consolidation was performed by the Sustainable Development Department taking the weighting of each activity in the Group into account. The average scores obtained per issue multiplied by the frequency were then re-weighted taking the maximum score for each category (impact materiality and financial materiality) into account.

## Adaptation of the analysis to the activities of Covivio Hotels

The activities of Covivio Hotels were included in the Group's initial rating. However, additional interviews were conducted to adapt the weighting of the scores to the hotel business.

The main adaptations concern:

- S1 - Own workforce: the subject can be merged (vs 3 sub-issues at Covivio level: Working conditions, diversity, Human Rights) given the importance of the HR subject in the hotel industry, with important issues related to respect for Human Rights and diversity.
- E3 - Water: this subject is more material given the more significant operating risk for hotels.
- E5 - Waste management: this issue is more material, with operational issues related to plastic and food waste.
- E5 - Circular economy and E4 - Biodiversity: the level of impact is lower for Covivio Hotels, because there are fewer developments and refurbishments.

These adaptations only resulted in a few changes to the selection of material issues, with the main adjustments being made to subjects that were already material for Covivio. However, it was decided to increase the importance of Waste Management in the Group matrix.

The process presented in this document is the same as for Covivio Hotels. The dual materiality matrix was validated by Covivio Hotels' steering Committee in October 2024 and presented to the Supervisory Board in November 2024. The CSRD and the CSR and associated reporting are managed at Group level. The sustainability report for Covivio Hotels is based on the Covivio report, by taking its specific characteristics into account, and applies the same procedures for data collection and validation.

Additional information was collected to more fully integrate the assets held as operating properties, especially regarding human resources.

### 3.1.2.4.2 Results of the double materiality analysis (IRO-2)

The matrix presented below is the result of the rating exercise as detailed in the previous section. It has been shared and validated as follows:

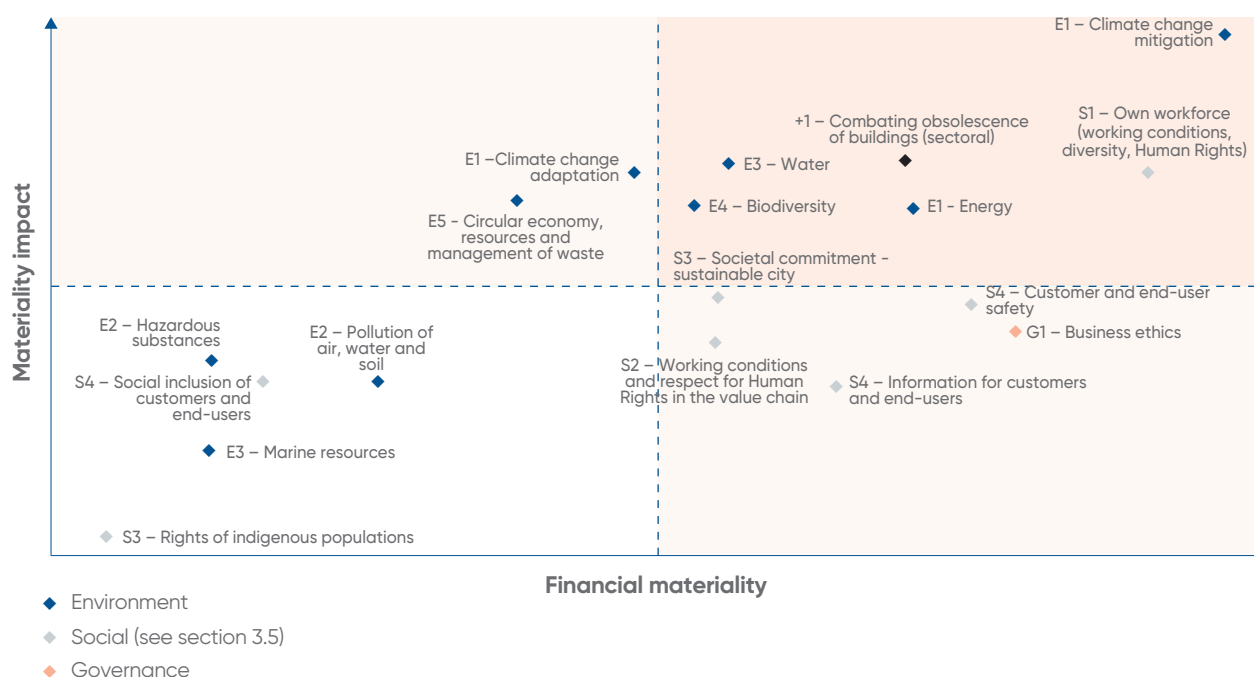
- Q1 2024: Presentation to workshop participants and the CSRD steering committee;

- April 2024: Presentation to the Executive Committee and the CSR Committee for consultation;

- September 2024: Presentation to the Audit Committee for validation.

Material issues are those for which a score greater than or equal to 2 has been obtained for either impact materiality or financial materiality.

#### Covivio Hotels dual materiality matrix



The list of data points reported is presented in section 3.5.1

#### Update of the dual materiality matrix

An assessment of the relevance of the subjects considered as material must be performed every year in order to:

- incorporate feedback following publication by peers;
- include any sectoral elements that may be identified;
- check consistency with the Group's risk mapping.

A full update will be performed every three years to reassess the relevance of the method and the IRO ratings, resulting in a new validation by the governance body.

### 3.1.2.5 Action plan (MDR)

Covivio set itself a CSR action plan in 2010. Revised every five years, this plan has been adapted to integrate the ESRS and new objectives related to the Nature strategy unveiled in 2024.

The operational breakdown of these objectives and the specificities by portfolio are specified in the sections relating to each ESRS of this report.






























**N** Objective of the Nature strategy




















**R** Objective of the Purpose

Covivio Hotels distinguishes several scopes according to its degree of control and the relevance of each action for the topics:

- corporate: concerns activities and employees related to Covivio Hotels head office;
- M&F Hotels: concerns the hotel management activity of Covivio Hotels, via its hotel platform WiZiu or mandated third-party managers.

The "Covivio Hotels" scope covers all the activities.

REFERENCE	ESRS		MAIN OBJECTIVES	SCOPE	DEADLINE	2024 COMPLETIONS	PROGRESS
 	 	Sector – Asset obsolescence	Hold 100% environmentally certified assets	Covivio Hotels	End of 2025	97.5% of the hotel real estate portfolio certified at the end of 2024	
			100% of Hotel in operation certified with Green Key	Operating properties	End of 2025	90% of hotels managed by WiZiu Hotels and 43% of all operating properties certified at the end of 2024	
 	 	E1 – Climate (Mitigation)	Reduce GHG emissions by 70% compared to 2010 (in intensity per kgCO <sub>2</sub> e/m <sup>2</sup> /year, operation)	Covivio Hotels	End of 2030	53% reduction in carbon emissions at the end of 2024	
		E1 – Climate (Adaptation)	Mapping 100% of assets with regard to climate risks	Covivio Hotels	Permanent	100% of assets included in the MSCI analysis.	
 		E1 – Climate (Energy)	Reduce energy consumption by 25% between 2010 and 2035	Covivio Hotels	End of 2035	-14% at the end of 2024 (179 kWhfe/m <sup>2</sup> )	
		E2 – Pollution	Managing environmental and health risks (including due diligence in the acquisition phase)	Covivio Hotels	Permanent	100% of sites are monitored and controlled	
 		E3 – Water	Reduce water consumption by 10% compared to 2024	Operating properties	2030	1.13 m <sup>3</sup> /m <sup>2</sup> at the end of 2024 on the operating scope	N/A
			Control water consumption by not exceeding the established threshold of 2 m <sup>3</sup> /m <sup>2</sup> /year	Covivio Hotels	Permanent	Threshold respected: 1.42 m <sup>3</sup> /m <sup>2</sup> for the portfolio	
		E4 – Biodiversity	Map 100% of the portfolio concerning the proximity of sites to natural areas	Covivio Hotels	Permanent	Completed in 2024	
			Achieve net zero artificialisation across the pipeline and 90% of operations as biodiversity positive.	Group Development	End of 2030	Measurement of impacts via the CBS tool developed by Covivio, to be deployed for Hotel operations	N/A
 		E5 – Circular economy	Set a multi-year waste production target for directly managed hotels	Covivio Hotels	2025	Not initiated at this stage, waste reporting coverage rate of 43% in 2024	
			Promote a circular economy approach in development projects	Covivio Hotels	Permanent	Not applicable for the moment due to the absence of ongoing developments	N/A
			Increase the use of bio-sourced, recycled and reused materials	Covivio Hotels	2026		N/A

REFERENCE	ESRS	MAIN OBJECTIVES	SCOPE	DEADLINE	2024 COMPLETIONS	PROGRESS	
<div><div><div></div><div></div></div><div></div></div>		S1 – Own workforce	Attract, develop and retain talent	Covivio Hotels	Permanent	Reporting on the Covivio Hotels operating properties scope Diversity of HR policies because of the number of brands – the launch of the WiZiU brand will enable a more homogeneous HR policy to be structured on this scope.	<div><div></div><div></div><div></div><div></div><div></div></div>
			Promoting diversity and equality	Corporate	Permanent	Covivio-wide ex aequo programme to raise employee awareness of gender equality	<div><div></div><div></div><div></div><div></div><div></div></div>
			Measure the well-being of teams every two years	Corporate	Permanent	Employee satisfaction survey conducted in 2023 at Covivio level	<div><div></div><div></div><div></div><div></div><div></div></div>
			Engaging employees in commitments of the Group	Corporate	Permanent	Employee involvement in various CSR actions: Covivio for Climate (C4C) project to raise employee awareness of sustainable development	<div><div></div><div></div><div></div><div></div><div></div></div>
<div><div></div><div></div></div>		S2 – Workers in the value chain	Have all our key suppliers sign the Responsible Purchasing Charter	Corporate	2025	Content of the Responsible Purchasing Charter updated in 2024 New system launched in 2022 based on the EcoVadis solution.	<div><div></div><div></div><div></div><div></div><div></div></div>
			100% of calls for tenders subject to a CSR questionnaire	Corporate and development	2026	Calls for tenders for works > €200K Corporate calls for tenders > €50K	<div><div></div><div></div><div></div><div></div><div></div></div>
<div><div></div><div></div></div>		S3 – Affected communities	Get involved in initiatives to boost the regions	Covivio Hotels	Permanent	Socio-economic impact study on all the Group's activities in Europe; 17,000 jobs supported in 2023 (study conducted in 2024).	<div><div></div><div></div><div></div><div></div><div></div></div>
			Promoting Human Rights and Equal Opportunities	Covivio Hotels	Permanent	Publication of Covivio's Human Rights Policy. Around twenty associations supported by the Covivio Corporate Foundation.	<div><div></div><div></div><div></div><div></div><div></div></div>
<div><div></div><div></div></div>		S4 – Customers and end-users	Optimising tenant and hotel guest satisfaction	Covivio Hotels	Permanent	Measurement of end-customer satisfaction via questionnaires, monitoring ratings and opinions expressed by users on the Internet (platforms, etc.)	<div><div></div><div></div><div></div><div></div><div></div></div>
<div></div>			Ensure a high level of connectivity within our buildings	Covivio Hotels	Permanent	Quality of connectivity in order to: for customers: support professional and personal activities, for hotels: hotel services, increase operational efficiency (check in/ check out, etc.)	<div><div></div><div></div><div></div><div></div><div></div></div>
<div></div>			Having 90% of assets located less than 1 km on foot from public transport	Covivio Hotels	Permanent	97% of the portfolio is less than 500 m from public transport, and 99.5% less than 1 km on foot from public transport.	<div><div></div><div></div><div></div><div></div><div></div></div>
<div></div>		G1 – Business ethics	Whistleblowing system with platform	Covivio Hotels	Permanent	System included in the scope of Covivio's Ethical Charter, given to all its partners	<div><div></div><div></div><div></div><div></div><div></div></div>
			Disseminate and share best ethics/ anti-corruption practices with all employees	Corporate	Permanent	100% of employees trained in Process Morning sessions and on the principles of the Ethical Charter	<div><div></div><div></div><div></div><div></div><div></div></div>

### 3.1.3 Combating asset obsolescence (sectoral challenges)

The dual materiality analysis conducted by Covivio in 2023/2024 and applied for Covivio Hotels, confirmed the challenges related to the risk of building obsolescence. Buildings can face this risk, with an impact on their value, if they are not regularly upgraded to respond to the challenges of ecological and digital transformation, or do not take societal changes or requirements for flexibility and services sufficiently into account. This subject interacts strongly with the other material issues presented in this report, in particular concerning the energy and carbon performance (ESRS E1) of assets and the qualities of the building in terms of well-being and safety for occupants (ESRS S4).

#### 3.1.3.1 Policy on the fight against building obsolescence (certifications, societal changes, smart building)

The battle against the obsolescence of the portfolio of Covivio and its subsidiary Covivio Hotels is being fought with a high level of ambition, in terms of the design and management of the buildings. Covivio therefore owns buildings that are very accessible and meet high standards, particularly in terms of connectivity, comfort and well-being. They are designed to offer maximum flexibility, so as to accommodate different types of users and organisations, and to provide long-term support to operators as their needs evolve. Open to the city, the gardens and terraces of the buildings are created to be real levers for biodiversity and contribute to the well-being of the occupants. Eco-designed and eco-managed, the buildings owned by Covivio aim to provide bespoke solutions tailored to each stakeholder, whilst ensuring that the building is integrated into its environment as seamlessly as possible. This strategy applies to the different assets held, given the specificities of each activity. The policy to combat building obsolescence also covers energy consumption and carbon emissions, major criteria which are examined in the ESRS E1.

Identified in the double materiality matrix (ESRS 2, section 3.1.2.4.2) as a major risk and impact, the topic of "Asset obsolescence/Green value/Products anticipating societal changes" covers a set of issues that are at the heart of the company's concerns and its asset management policy. There could be numerous negative repercussions if this is not controlled properly: holding assets with low potential for value creation, the loss of attractiveness of the property or additional costs for works due to poor maintenance, competitive disadvantage linked to the absence of certification or an unattractive location, etc. To address these potential risks and minimise their impact, Covivio strives to anticipate regulatory changes and to apply the highest international construction and service standards, with a strong partnership-based approach that draws on a thorough knowledge of each customer and their needs (ESRS S3, 3.3.4.3.2). Covivio, by controlling the entire value creation chain, ensures that the quality of its buildings meets the expectations of its customers and the market. Finally, Covivio optimises the value of its assets, while participating in the development of the circular and low-carbon economy and integrating resilience issues, in order to more effectively prevent and adapt its assets to climate change.

#### Management and implementation of the obsolescence policy

The policy to combat asset obsolescence is included in the Sustainable Development governance plan which is presented in ESRS 2, section 3.1.2.2.1, as a key element of the Group's CSR strategy. Driven and monitored by the Sustainable Development Department, its implementation involves all levels of the company (HR, Finance, Audit and Internal Control (ACI), IS, Communication, etc.) as well as the operational departments, Asset Management and Technical Department.

##### 3.1.3.1.1 Co-inventing a new real estate

The focus of several programmes developed by Covivio is on a mix of functions: offices, co-working spaces, hotels, residential, street-level shops and even co-living. These programmes are designed in a spirit of cooperation with stakeholders and help to enhance the appeal and influence of the districts where they are located. Proximity and personalised customer relations are at the heart of Covivio's culture. Covivio regularly conducts satisfaction surveys on a variety of topics to continuously meet customer expectations and develop the Group's services and processes. Action plans are deployed following these surveys, thereby guaranteeing customers that their needs are being carefully listened to and quickly taken into account. The offer of services focuses on a simple and fluid path and flexible and personalised spaces, for a constantly renewed experience.

According to a report published by Booking in 2024 <sup>(1)</sup>, 62% of respondents favour stays that respect the planet, include elements of the local culture and promote enriching exchanges with communities.

##### 3.1.3.1.2 Surpass construction standards

A large number of operators believe that energy and environmental performance has become a prerequisite, likely to influence their choice of hotel locations. In addition, criteria contributing to the well-being of their customers and employees are becoming increasingly important to their choice of location (user-friendliness, services, connectivity, accessibility, etc.). Covivio Hotels incorporates these new expectations into the buildings it develops, leases, manages and renovates, by exceeding standards with the use of certifications and labels (3.1.3.1.3), as well as innovative solutions that go beyond legal obligations and anticipate changes in regulations.

(1) The latest report from Booking.com on sustainable travel highlights the challenges faced by consumers and underlines the need for collaboration between different sectors.



As a developer, Covivio engages its stakeholders in its construction sites, through a strong partnership relationship and detailed procedures. For each certified project, four key documents qualify the technical and environmental performance: environmental notice, management system for the operation, assessment of the environmental quality of the building (HQE or BREEAM), and the low- nuisance construction site charter. They commit all those involved in the project and detail the environmental principles to be followed, as well as specific objectives adapted to each project. It draws up a list of recommendations on the following subjects (at minimum): waste, acoustics, consumption of resources, communication with local residents, materials, communication with local residents, social aspects (comfort, safety, well-being). The charter explains each person's roles and sets specific objectives: for example, aim for 85% construction site waste recovery, limit the maximum noise level on the construction site to 80 dB (A), use 80% PEFC or FSC certified wood. etc.

### 3.1.3.1.3 Building certification policy

Covivio Hotels develops proportionately few new buildings and usually acquires existing buildings to complete a portfolio of 283 buildings in operation. Covivio has chosen to classify the performance of its new buildings using comprehensive, internationally recognised certificates, such as HQE, BREEAM or LEED. Similarly, Covivio uses BREEAM In-Use or Green Key certifications to enhance the quality of its CSR management, in order to improve the performances of its operating portfolio. In addition, the tenants of its leased buildings use labels dedicated to the hotel and leisure sector: Green Key, Green Globe, GSTC, etc.

Covivio, which is a partner in developing certain labels, is also a pioneer in experimenting with new standards such as R2S, BiodiverCity and, more recently, by committing to the creation of a Europe-wide low-carbon label, LCBI, and developing the BBKA Hotel label, with the support of the BBKA association.

#### Focus on new developments

Covivio has made several commitments in terms of certifications and labels for its development projects as part of its green financing and CSR objectives. These principles apply to projects classified as new construction or major renovation. They do not apply to small renovations or building extensions, for example.

- **Goal of global environmental certification (HQE/BREEAM/LEED/DGNB) and compliance with European taxonomy:** all developments (new constructions and major refurbishments) must comply with European taxonomy and/or aim for certification at a level greater than or equal to Excellent/Gold.
- **Specific labels:**
  - carbon (BBKA Hotels): designates the building's low-carbon performance;
  - operations: Green Key, Green Globe, GSTC, etc.

This policy reinforces Covivio's commitments to taxonomy compliance for its development projects (ESRS E1).

### 100% of the hotels managed by WIZIU will be Green Key certified by the end of 2025, i.e. 24 hotels (EPRA Cert-Tot)

The Green Key label (Green Key in France) is present on all continents, in 77 countries and on more than 6,700 sites (hotels, restaurants, campsites, etc.). Green Key is the first international eco-label for tourist accommodation. This label was launched in France in 1998 under the name Clef Verte. France is the second country in the world to have developed the Green Key label, and has been the first country for the number of certified hotels since 2021.

The criteria applied by the approved hotels are as follows:

- implementation of an environmental policy and a socially responsible approach;
- smart waste management (reduction at source, collection and recycling);
- control of energy and water consumption;
- Responsible Purchasing (in particular for food and maintenance);
- active customer awareness.

The certification process involves regular audits and the collection of supporting evidence to confirm the credibility of the hotel's approach. In practice, in order to retain the label, improvements must be made each year based on the criteria specified by the label.

This label has a large audience, particularly among business customers.

### 3.1.3.1.4 Continuing to innovate to remain a pioneer

Although innovation means introducing new products, services or processes to the market, these only have meaning for Covivio if they succeed in transforming the ways in which its customers work, travel or live in a sustainable way. Covivio's innovation strategy has been consistent for several years and is based on fostering the development of new uses, improving the quality of its assets and, lastly, focusing on open innovation.

Covivio's innovation strategy is based on two pillars:

- identifying and facilitating the use of new processes and materials to make buildings more resilient;
- deploying new offers and systems that improve comfort and services to occupants.

All these innovation efforts are aimed at anticipating real estate market trends to meet the changing needs of our multiple clients.

#### Innovate to offer buildings in the virtuous and resilient buildings market

Covivio uses innovative materials and processes such as low-carbon concrete and recycled materials, to comply with its carbon trajectory in line with the new "RE 2020" regulation. Covivio carries out pilots or POCs (Proof of Concept) to test new solutions, whether designed by large manufacturers or by smaller players. For example, in 2024 Covivio tested, with the industrial company AGC Glass Europe, a solution for crushing and recycling existing glazing in order to reinstall new low-carbon glazing. This experiment, carried out at the "BEIGE" building in Paris, enabled new ways of recycling materials to be tested on a full-scale basis.



### Permanent oversight

To innovate over the long term, it is important to be constantly on the watch for emerging trends and to identify and explore new opportunities. To this end, Covivio:

- Collaborates with around fifty start-ups across Europe. In various areas such as automated space management, urban mobility, new catering offers, etc., these operational partnerships enables the testing of new solutions adapted to the needs of our customers and our buildings.
- It is part of the Sekoya collaborative platform, which is dedicated to low-carbon solutions and which was developed by Impulse Partners and Eiffage. It brings together large groups, SMEs and innovative start-ups to identify, test and deploy sustainable technologies in the construction and real estate sector. Sekoya acts as an innovation accelerator by facilitating the networking of stakeholders, the sharing of best practices and assessing the environmental impacts of the proposed solutions.
- Publishes a monthly innovation newsletter which is distributed throughout Europe and has an Innovation Committee which convenes every two months with the company's main operational departments (Technical, Asset Management, Innovation, Sustainable Development, Operations, IS).

### 3.1.3.2 Description of impacts, risks and opportunities (IRO)

SECTORIAL - FIGHT AGAINST BUILDING OBSOLESCENCE	
<b>Description and key words</b>	Environmental certifications and specific labels Smart building Building flexibility and mixed use
<b>Main impacts</b>	The impacts are mainly related to the environmental performance of the real estate portfolio, which may have an effect on the environment and the well-being of customers. Intensification of uses Reversibility of spaces and change of use Impact of the major development directions of tomorrow Pace of energy renovation
<b>Positioning in the value chain</b>	Direct operations
<b>Main risks</b>	Financial risks: Ownership of assets with low potential for value creation Loss of attractiveness of the portfolio or additional cost of work Competitive disadvantage due to lack of certification or unattractive locations. Cost of additional certifications and labels to meet market expectations Potential compliance issues
<b>Main opportunities</b>	Liquidity of assets Reputation
<b>Materiality</b>	Material

Covivio's comprehensive view of the building's life cycle aims to address all the IROs related to the battle against the obsolescence of its buildings. Policies (3.1.3.1) and actions (3.1.3.3) deployed in this area cover the various stages of this life cycle, as detailed below:

#### A GLOBAL AND SUSTAINABLE VISION OF THE BUILDING

#### CONTRIBUTIONS TO SUSTAINABLE DEVELOPMENT

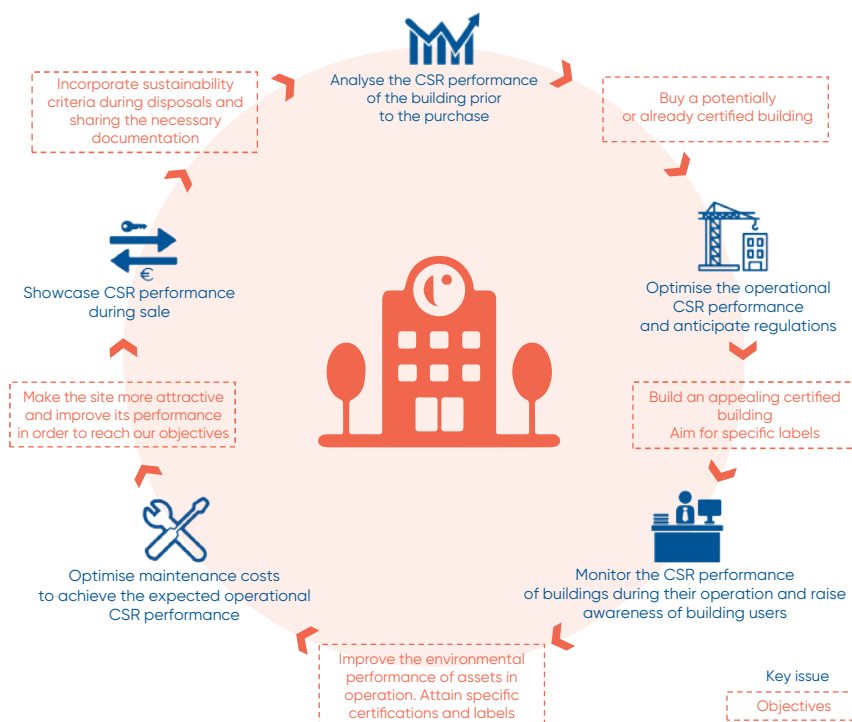
Anticipating regulations, incorporating constraints relating to the market and changes in lifestyles and work practices

Reducing the environmental footprint of the building throughout its life cycle

Maximising social and societal contributions with regards to its occupants, local residents, the housing market, etc.

Placing the criteria of comfort, health and well-being of the end-user and environmental issues at the heart of the project

Using solutions which encourage diverse uses, players, energies, etc.



### 3.1.3.3 Actions implemented

A building has a long lifespan (life cycle analyses cover a period of 50 years, Haussmann-style buildings are more than a century old, etc.) but our lifestyles and tools (computing, digital, etc.) change much faster. Buildings must therefore be easily adaptable to accommodate changes in use and technologies that are taking place in ever shorter time frames. The financial effects of this action plan are mainly related to the Capex plan provided for in the mitigation plan. The action programme put in place to achieve the carbon trajectory is a major part of this process.

#### 3.1.3.3.1 Improve the flexibility and reversibility of buildings

##### Increasing flexibility and services for bespoke projects

The study commissioned by Covivio to Opinion Way in 2020, "Flexibility First!"<sup>(1)</sup>, underlined the fact that employees and managers have common expectations and requirements regarding the changing office, towards greater flexibility, but also concerning the working atmosphere and the provision of varied spaces adapted to changing working methods. Covivio firmly believes that flexibility and services will be decisive factors in the collective performance of organisations in the future, and is therefore combining its lease and service contract offers to provide hybrid offers. The Group is also adapting its processes to involve users in project design, as early as possible, through design thinking workshops or working sessions with innovative partners, particularly in the area of services.

##### Promoting an inclusive corporate culture

As a result of a study undertaken with the support of the design agency Total Tool and Professor Giulio Ceppi of Politecnico di Milano, Covivio has developed scenarios and guidelines for designing more inclusive workspaces. This document, which is available online<sup>(2)</sup>, also details the principles to be respected in design and layout, in order to promote diversity and inclusion.

##### Give a second life to office buildings

Covivio, which has a diverse portfolio, has for several years been identifying buildings that can be converted into residential properties when residential use becomes more relevant than commercial use, from the point of view of the city and the market. Covivio is also studying the reconversion of office buildings into hotels in conjunction with the market and local authorities. This strategy enables additional land artificialisation to be combated and urban areas to be rejuvenated by developing assets that are in harmony with new lifestyles and new ways of working.

### 3.1.3.3.2 Covivio is accelerating its digital transformation

Covivio, which is a European real estate operator, has been engaged in a far-reaching digital transformation for several years now, as a result of a collaborative process of reflection. Led at the European level by the Chief Transformation Officer and the country IT teams, in collaboration with the members of the Executive Committee and the Transformation Committees, this digital transformation is a continuous improvement process designed to serve customer satisfaction, portfolio performance and operational efficiency of Covivio teams in Europe. By equipping itself with a digital roadmap, the Group's goal is to carry out a sustainable and carefully considered digital transformation, to serve Covivio's strategy, by closely involving all stakeholders at the European level.

#### Optimise development management and operation thanks to BIM (Building Information Modeling)

Computer modelling of the building enables a comprehensive and coherent 3D database to be created and maintained throughout the life of a real estate project: design, construction, operation and deconstruction. BIM also improves the operational management of the building, by facilitating the design of space arrangements and access to facilities (geolocation of equipment). The BIM is also a tool within the circular economy that enables the traceability of materials and equipment to be organised with a view to their reuse. Covivio already has buildings built using BIM and most of its recent development projects now use this technology.

#### Preparing the smart city of tomorrow

Buildings will gradually become part of the energy distribution network: alternately producers and consumers, smart buildings will form an integral part of smart grids managed at district and city level, themselves part of bigger networks. Covivio is actively participating in studies on energy flexibility, in particular FlexEner, in collaboration with the IFPEB<sup>(3)</sup>, RTE and Enedis, in order to prepare the smart city of tomorrow.

(1) [https://www.covivio.eu/wp-content/uploads/sites/6/2023/08/PRESS-KIT\\_-Survey.pdf](https://www.covivio.eu/wp-content/uploads/sites/6/2023/08/PRESS-KIT_-Survey.pdf)

(2) <https://www.calameo.com/covivio/read/005608009f2561bdf0437>

(3) Institut Français de la Performance Environnementale du Bâtiment.

### 3.1.3.4 Towards 100% of buildings certified (goals and metrics)

The certification rate is the percentage of buildings certified for their construction (HQE, BREEAM, LEED) and/or their operation (BREEAM In-Use, Green Key, etc.), calculated in Group Share value on 31 December 2024.

Covivio has set itself the target of holding 100% certified core assets (i.e. intended for long-term inclusion in the portfolio) by the end of 2025, across all its activities. Exclusions from the scope are specified in the environmental reporting protocol and represent less than 5% of the total value of the portfolio. At the end of 2024, this rate is 97.5% for the hotel portfolio. In accordance with the reporting protocol, the rate includes two assets in respect of which a file has been submitted to the BRE but for which no certificate had been received on 31 December 2024, representing 2.4% of the portfolio (or 0.5%) at Group level.

The certification indicator is monitored as part of the internal monthly CSR reporting and plays a structuring role in the policies for the development, works and arbitration in the real estate portfolio. This indicator is also used to calculate the long-term incentive and/or the variable portion of the corporate officers and managers concerned.

The purpose of monitoring by the Sustainable Development Department and the operational teams of each activity is to identify:

- certifications to be launched for non-certified assets or to be renewed for certifications in operation;
- the potential for improving the level of certification for renewal and the measures to be implemented to achieve this;
- the change of standards, particularly for hotels, in order to choose a label that is relevant to the business and the brand.

By exceeding regulatory standards, Covivio is helping to create an offer that meets new market expectations. These global certifications are recognised by the chain of players in the sector: builders, consultants, real estate companies, tenants, bankers, shareholders. The framework for defining green products is set to change under the impetus of the European Green Taxonomy (3.2.6).

#### BBCA launches a low-carbon label for hotels

In March 2024, the BBKA Hotel label was launched. It can be obtained for new construction, renovation or operation. Work on this standard was carried out in partnership with pioneering players in the hotel industry, including Covivio.

Some sixty diversified hotel projects (between 1,000 and 40,000 m<sup>2</sup>) were studied to identify the specific characteristics of a hotel's greenhouse gas emissions. The study focused in particular on the best practices to be deployed to reduce these emissions and to determine the low-carbon performance thresholds for obtaining the BBKA label.

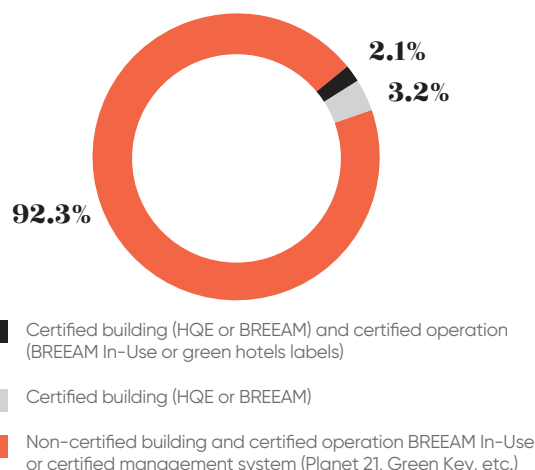
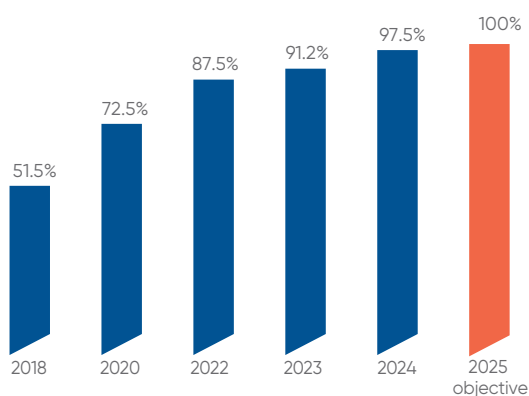
#### Change in hotel environmental certification rates in Europe

The environmental certification of the hotel portfolio benefits from the engagement of the tenants, major operators who deploy their own sustainable development strategies. Some use labels specific to the hotel industry (Green Key, GSTC<sup>(1)</sup>, Green Hotel) and leisure activities (Green Globe), or have implemented systems equivalent to the environmental certifications of the operation, such as Planet 21 for Accor and Green Engage for IHG. **88%** of the customer base had such a label at the end of 2024.

**As of 31 December 2024, 90% of the hotels operated by WiZiU (a subsidiary of Covivio Hotels that owns and operates part of its assets as operating properties) have obtained the Green Key label or are committed to this certification process.**

Furthermore, and without this being included in the calculation of Covivio's asset certification rate, it should be noted that 26% of the hotels owned have TripAdvisor's Green Leader status

#### Share of certified buildings and breakdown by type of certification (in Group Share value)



(1) Global Sustainable Tourism Council: World Council for Sustainable Tourism in French has developed an internationally recognized standard.

## 3.2 Environmental information

### 3.2.1 Climate change (ESRS E1)

The ESRS E1 standard addresses climate change. It covers both the mitigation of and adaptation to climate change. It also covers energy-related questions, insofar as they are relevant to this issue.

The purpose here is to explain how Covivio influences climate change by detailing its positive and negative, actual and potential material impacts, as well as its past, present and future mitigation efforts, in accordance with the Paris Agreement which is compatible with limiting global warming to 1.5°C.

As a preliminary remark, information concerning the integration of sustainability performance into incentive mechanisms, particularly with regard to the Chief Executive Officer (CEO) and the Deputy CEO, is explained in ESRS 2, section 3.1.2.2.4.

#### 3.2.1.1 Climate Change Mitigation Transition Plan (E1-1)

##### 3.2.1.1.1 Objectives to reduce the Group's carbon footprint

Covivio Hotels is fully integrated into the Covivio Group-wide climate change mitigation transition plan for its various activities. Covivio Hotels is included in deployment of policies concerning energy and carbon, certification, biodiversity, etc. The activities of Covivio Hotels are included in the scope of the trajectory defined by the Group. Thus, with the support of Covivio's Sustainable Development Department (cross-functional for all activities), Covivio Hotels is committed to implementing actions to achieve its CSR objectives.

Capitalising on its experience in reducing energy consumption and greenhouse gas emissions, Covivio decided to accelerate its transition in 2021 by stepping up its ambitions across its directly managed commercial portfolio, to align with a 1.5°C trajectory (Scopes 1, 2, based on the IPCC scenarios).

Covivio has raised its ambitions and once again positioned itself as a major player in the low-carbon transition of the European real estate sector, less than three years after the publication of its first carbon emission reduction trajectory, which the Science Based Target initiative (SBTi) acknowledged, in the summer of 2018, was compatible with the 2°C scenario of the Paris Agreement. Covering all of Covivio's activities in Europe, this trajectory, updated at the end of 2021, takes into account the Group's experience in low-carbon construction and additional experiments on materials, the circular economy and biodiversity. These targets were approved by the SBT initiative in early 2022. Covivio is currently studying the new SBT benchmark for the real estate sector, aiming for a 1.5°C trajectory in line with Scopes 1, 2 and 3 related to the use of buildings, as well as a net zero carbon contribution by 2050.

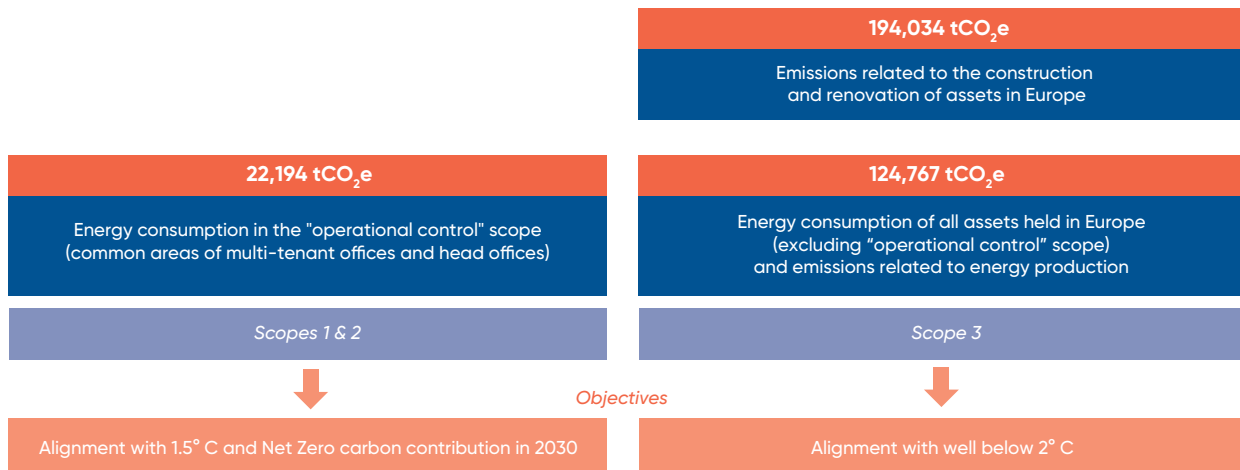
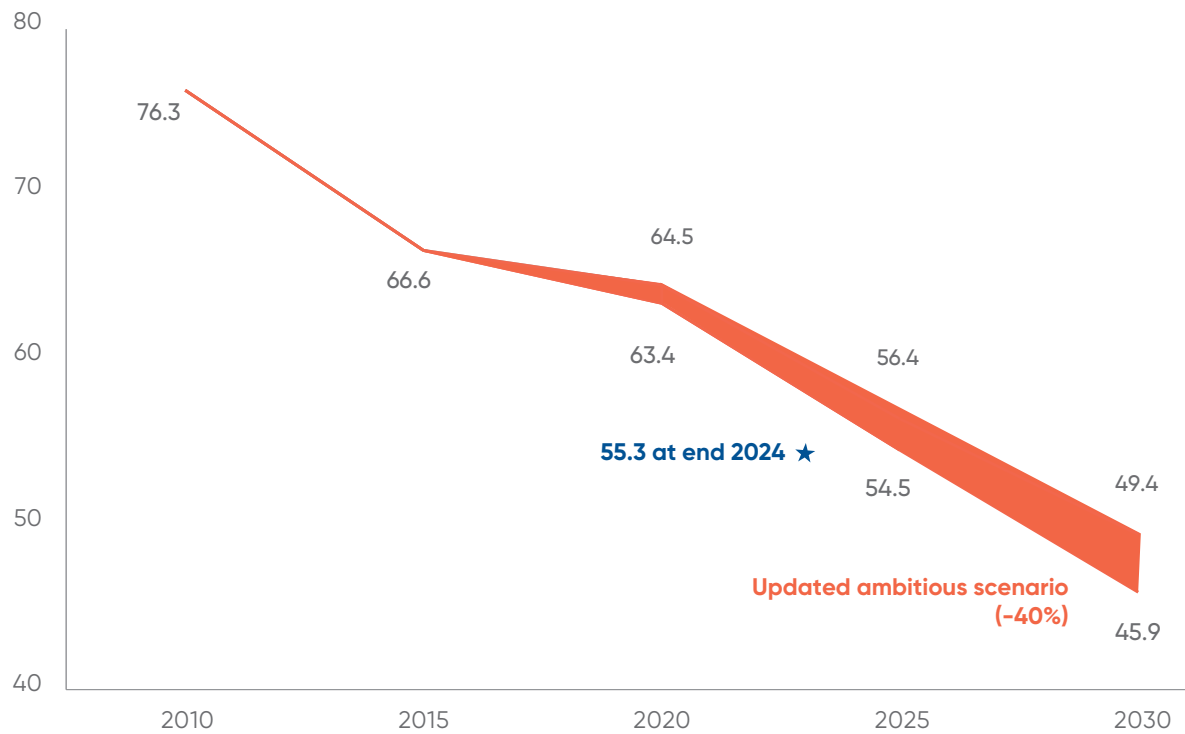
Covivio's involvement in initiatives such as the HQE-GBC Alliance, the BBKA association, Sekoya and the Low Carbon Specifiers Hub (3.2.1.1.2.b), has enabled it to acquire a great deal of expertise in the field, allowing it to consolidate its 10-year vision. The in-house carbon tools, developed with the CSTB, enable informed decisions to be taken from the design through to the operation of buildings. For example, the Express LCA, which covers construction and renovation, enables carbon performance to be estimated at the beginning of a project and sensitivity to impacts to be calculated based on the choice of materials or the shape of the building.

Updating Covivio's carbon footprint has resulted in the following objectives:

- reduce greenhouse gas emissions by 40% between 2010 and 2030 (Scopes 1, 2 and 3) in terms of carbon intensity;
- align the objectives of its directly managed activities with a 1.5°C trajectory, *i.e.* a 63% reduction in absolute emissions between 2015 and 2030, on Scopes 1 and 2 (operation of common areas of multi-tenant buildings and head offices);
- aim to align with the SBTi's "Well-Below 2°C" scenario (between 1.5 and 2°C) on Scope 3 (construction, renovation, operation of private spaces in multi-tenant buildings, single-tenant offices, residential and hotels).

In addition, Covivio is committed to making a "Net Zero Carbon" contribution from 2030. Achieving the carbon trajectory for each activity requires implementing different actions, in particular by carrying out works (Capex) on the portfolio. These works were identified and costed for each portfolio in 2022 (3.2.1.1.3).

**2030 trajectory of the average carbon footprint per m<sup>2</sup> (construction + restructuring + operation) – Covivio Group data**  
(Summary of Covivio's activities in Europe, in carbon intensity kgCO<sub>2</sub>/m<sup>2</sup>/year)

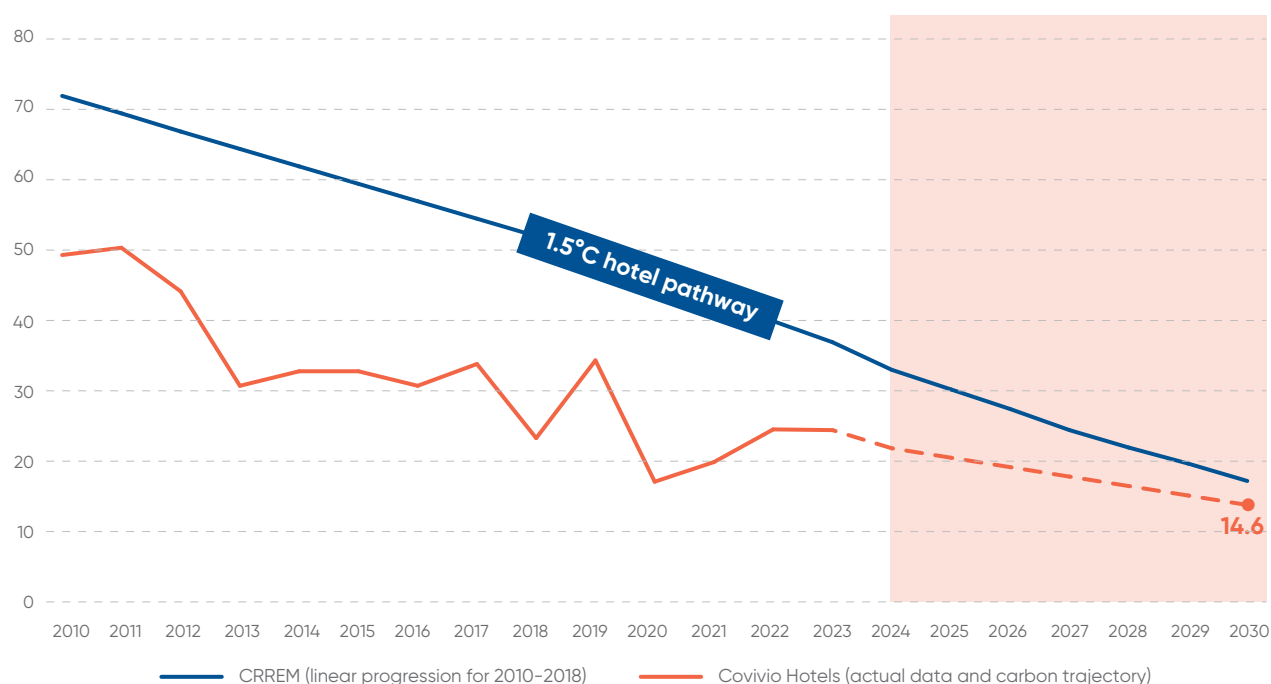


### Focus on CRREM (Carbon Risk Real Estate Monitoring) scenarios

Covivio has selected the CRREM 1.5°C trajectory as its baseline scenario in the context of its work with MSCI on climate risk value (3.2.1.1.12).

Covivio has reconciled the CRREM scenarios for each portfolio with the historical greenhouse gas emission (GHG) data already published each year and with the data calculated up to 2030 for its carbon trajectory. This enabled the consistency of the GHG reduction targets in the commercial portfolios validated, which are below the "tipping point <sup>(1)</sup>" levels identified by CRREM. The scenarios used are those published by the CRREM on 11 January 2023 which are more ambitious than the previous ones.

### Reconciliation of CRREM scenarios with the Covivio Hotels carbon trajectory (CRREM version of 01/11/2023)



Covivio is currently working to update its objectives following the publication of a new benchmark for the real estate sector by the SBT initiative and the CRREM. This study aims to identify the conditions in which these objectives could match a 1.5°C trajectory across the three Scopes for the operational part. The update of these objectives could also be an opportunity for Covivio to specify the conditions for achieving its contribution to carbon neutrality by 2050 at the latest on the three Scopes.

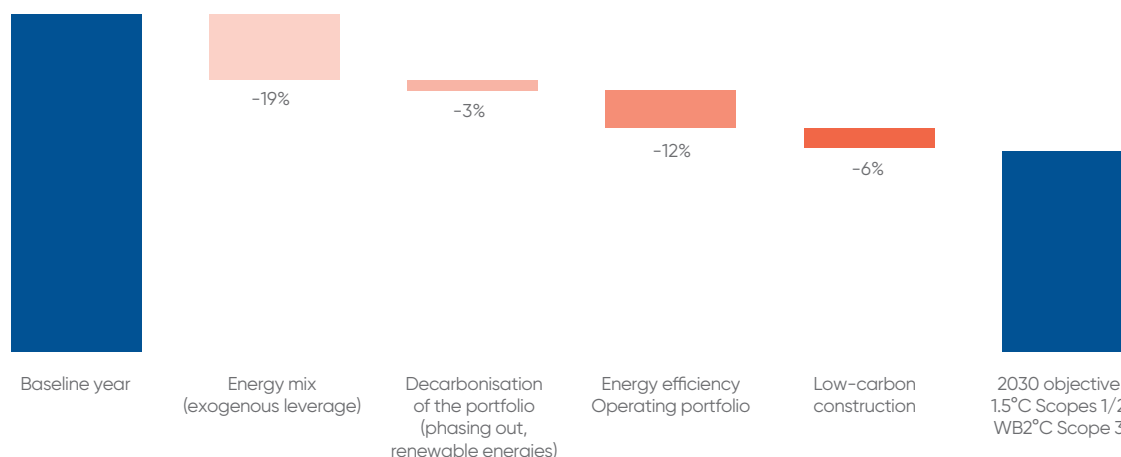
<sup>(1)</sup> Tipping point: year in which the asset emits more CO<sub>2</sub> than the level required to comply with a 1.5°C trajectory, i.e. the year in which the asset becomes a "stranded" asset.



### 3.2.1.1.2 Levers to reduce the Group's carbon footprint

To achieve a 40% reduction in its GHG emissions, Covivio has identified several levers covering both the use phase and new developments. The success of this trajectory also depends on the Group's ability to interact with stakeholders, starting with customers but also through active participation in dedicated working groups. The baseline year corresponds to an overall volume of emissions of 464 ktCO<sub>2</sub>e.

#### The main decarbonisation levers



Following the definition of Covivio's Nature strategy, these levers have been supplemented with new commitments on the circular economy (ESRS E5, section 3.2.5.2) that aim to reduce the carbon footprint of development projects.

#### 3.2.1.1.2.a Quantifiable levers

##### Decarbonisation of the portfolio

###### Developing renewable energy on site

Renewable energy is a strong lever for reducing the carbon footprint connected to the energy consumption of buildings. The use of renewable energy sources is systematically studied in Covivio's development and renovation projects, in order to determine the possibilities available, by taking the specific characteristics of the environment and the regulatory context into account: geothermal energy, photovoltaic energy, etc.

Several sites have been equipped with solar thermal panels (domestic hot water) or photovoltaic panels (renewable energy production).

Wherever possible, Covivio has opted to connect its buildings to urban heating networks. The percentage of renewable energy in the networks varies from one location to another, but the managers have set medium and long-term objectives for increasing the share of renewable energy in their mix. Renovations are also an opportunity for implementing new solutions.

###### Photovoltaic production in Covivio's portfolio

Photovoltaic production in the hotel portfolio amounted to 42 MWh in 2024, compared to 32 MWh in 2017. Renovation operations are an opportunity for studying the possibility of installing photovoltaic equipment.

The majority of projects developed by Covivio consist of renovations/refurbishments. The favoured solution for meeting the requirements of local authorities, and for complying with town planning restrictions and adhering to the Group's Nature strategy, is to create green terraces. Photovoltaic installations are fitted in new operations and, to a lesser extent, in the construction of canopies over car parks.

###### Contribute to carbon neutrality at the building level

Carbon neutrality can only be envisioned during the construction or renovation phase of the building through offsetting. Conversely, the building can be operated in a neutral way by using renewable energy for different needs: lighting, hot water, heating, etc. Some Covivio Hotels buildings meet these criteria when they exclusively use electricity (also for heating or geothermal energy, for example) and have green electricity contracts. Thus, 6% of the hotels under management have an intensity of less than 5 kgCO<sub>2</sub>e/m<sup>2</sup>.

Many Covivio Hotels buildings benefit from a green electricity contract, a choice made by the operators, who are responsible for their energy consumption. Although the share of green electricity with guarantees of origin accounted for only 8% of total electricity consumption in 2017, it now totals 33% and 47% for the scope under management.

**Spotlight on a virtuous renovation: the example of L'Atelier (6,500 m<sup>2</sup>, delivered in February 2024), Covivio's new European headquarters**

This real estate complex, which previously housed offices and a telephone exchange, has been renovated to the highest environmental standards (HQE Excellent, BREEAM Excellent, BBCA Rénovation, Osmoz, R2S, Biodiversity). It has enabled energy saving of 44% (regulatory calculations) and the creation of 1,000 m<sup>2</sup> of green spaces. This renovation also enabled a carbon-free energy mix to be chosen by connecting the building to the district network (whereas the building was initially heated by gas) and by signing an electricity contract for electricity with a 100% guaranteed French renewable origin.

**Committing to low-carbon construction in Europe**

**Life cycle analyses**

Covivio has carried out life cycle analyses (LCA) since 2010, in order to quantify the environmental impacts of projects at each stage of their life cycle (construction, operation of the building and finally deconstruction). These LCAs are performed from the analysis of six modules (materials, energy, water, travel, construction site and waste). In 2013, Covivio had the first LCA performed in France on a building renovation (Steel building - Paris 16<sup>th</sup>), and the first LCA in France on a hotel (B&B Porte des Lilas) in 2014.

Today, the RE2020 thermal and environmental regulations include the requirement to use an LCA to combine energy and carbon performance. LCA is also at the heart of the Low-Carbon Building (BBCA) initiative, led by the Low-Carbon Building Association which Covivio is one of the founding members of.

**Labels and certifications**

Covivio is one of the founding members of the BBCA Association, set up to promote low-carbon practices and which has resulted in the BBCA label. This label quantifies and assesses the reduction of the building's carbon footprint throughout its life cycle (construction/operation/end of life/carbon storage), based on a certified independent measurement. Covivio aims to draw heavily on the principles of the BBCA label in the context of its 1.5°C trajectory to achieve its objectives in Europe. Covivio is also collaborating on the European LBCI (Low Carbon Building Initiative) coordinated by BBCA and launched in 2022. This resulted in the creation of a European standard for the construction of low-carbon buildings in January 2024 with the introduction of the LBCI methodology (version V1.0)<sup>(1)</sup> and the associated Label.

The BBCA label for hotels, which Covivio Hotels helped develop, was launched in 2024 for new construction, renovation and operation.

- More information: section 3.1.3.4.

**The choice of materials**

The choice of materials is decisive for the building's carbon impact, during the construction phase of course, but also during the operation phase. Covivio is therefore particularly attentive to

these decisions, favouring quality, recycled and recyclable, biosourced and health-friendly materials. Covivio, as a developer, works with suppliers in the context of the above-mentioned working groups or directly. This, in particular, is achieved through "low-nuisance construction site charters" for development projects, which enable goals adapted to each project to be defined. Awareness-raising actions are carried out among the teams to integrate the challenges of the circular economy into the Company's activities and day-to-day operations. The use of sustainable and more easily recyclable materials is now widespread in the Group's practices, in line with the targeted environmental certifications. All these issues are covered by the certification targets set by Covivio as part of its development projects. This is the case, for example, for target 3 of the HQE standard, "Construction site with a low environmental impact", concerning the optimisation of waste management, the limitation of nuisances and pollution on the construction site, or reducing the consumption of resources on construction sites.

- For more information on the actions carried out by Covivio in terms of the circular economy: ESRS E5 section 3.2.5.3.

**Improve portfolio energy efficiency**

**Providing transparent and reliable information**

Each asset is covered by different benchmarks with different energy or carbon emission objectives. In order to develop a common approach and consistent objectives with hotel operators, Covivio Hotels has created a reporting platform which details the CRREM trajectory, the monitoring of EPCs and regulatory objectives, as well as the planning of decarbonisation investments for each asset.

Carbon emissions are therefore monitored in accordance with the Group's SBTi targets and each asset has its own target for 2030. The action plans are defined in relation to the different targets set, in terms of reducing emissions as well as primary energy consumption.

This tool is accessible to Covivio Hotels internal asset management teams as well as to the operational teams of hotel operators. The objectives and the approach are shared with all stakeholders, in particular the hotel directors who are involved in the implementation and planning of the actions.

An overall view is consolidated at the level of Covivio Hotels and by brand, which enables the quantities of annual emissions to be processed between now and 2030 to be monitored - expressed in metric tons of CO<sub>2</sub>e - as well as controlling reduction costs (costs of a decarbonisation solution compared to the CO<sub>2</sub> emissions avoided) of each planned action, expressed in euros invested per metric ton of CO<sub>2</sub>e avoided.

Covivio has had 133 new energy audits performed on its commercial real estate portfolios as part of its works to quantify the investments needed to achieve CO<sub>2</sub> reduction targets. These audits provide a better understanding of the assets and identify the most appropriate measures for reducing the consumption of the buildings.

<sup>(1)</sup> "The aim of the Low Carbon Building Initiative is to encourage real estate players to accelerate the decarbonisation of the sector." - Covivio

### Committing to energy efficiency

In 2022, the French government, in response to the energy and climate crisis, required a 10% reduction in energy consumption by the end of 2024. Companies have therefore been asked to identify and activate all the levers at their disposal.

#### Covivio signatory of the Tertiary Energy Efficiency Charter

The National Energy Efficiency Plan launched in the autumn of 2022 has enabled France's annual electricity and gas consumption to be reduced by 12%, by taking the effects of weather into account.

To continue this momentum, two charters were proposed for signature: one for professional federations and associations, which have passed it on to their members; the other for private companies in our sector.

80 players signed these two charters on 18 October 2023, in particular the FEI (Fédération des Entreprises Immobilières) and Covivio, in the presence of the Minister for the Energy Transition, Agnès Pannier-Runacher.

Covivio had already activated a number of levers, in particular by raising customer awareness (environmental committees, technical meetings on the tertiary eco-energy system (tertiary decree) and building maintenance, environmental certification), integrating energy performance into its works and development plan, and setting up supervision and an energy management contract.

In September 2022, Covivio sent a letter to the tenants of the commercial buildings which it manages directly concerning the efficiency plan. This approach was part of the awareness-raising process carried out on the implementation of the provisions of the tertiary decree. This letter outlines the main eco-friendly actions to be implemented to reduce and optimise energy consumption in three areas:

- **adaptation of set points (heating and air conditioning):** during working periods, the heating set point is at 19°C and that of the air conditioning at 26°C, with the possibility of a remote control range of +/- 1.5°C. The air conditioning must be turned off when the windows are open;
- **lighting:** switching off illuminated signs between 9 p.m. and 7 a.m. and lighting in meeting rooms when they are not in use, as well as the installation of presence detectors. Where appropriate, façade lighting is switched off for part of the night;
- **office automation:** switching off office equipment including digital screens (rather than putting it on standby).

Customers are also invited to make any suggestions that could help achieve this energy efficiency objective.

A Tertiary Building Performance Commitment Committee was set up in the fourth quarter of 2024 to monitor the roll-out of the tertiary eco-energy scheme (DEET) resulting from the tertiary decree and its orders, and to ensure the monitoring and sustainability of the initiatives carried out within the framework of the Tertiary Energy Efficiency Charter. Under the aegis of the Sustainable Building Plan, this Committee will be co-chaired by Jean-Eric FOURNIER, Chairman of the CSR Commission of the FEI and Sustainable Development Director of Covivio, and Magali SAINT-DONAT, Chairwoman of the CSR Commission of ADI. The IFPEB (French Institute for Building Performance) and the OID (Sustainable Real Estate Observatory) will provide their expert support.

### An ambitious multi-year work plan

Improving the portfolio's environmental performance aims to reduce both the energy (3.2.1.5) and carbon footprint (3.2.1.6), water (3.2.3.4.1), waste (3.2.5.5), and also to increase the comfort and well-being of occupants, through the choice of materials, the quality of the spaces and air in the premises, the care given to subjects such as biophilia, services, etc.

Covivio's multi-year work plan includes energy and carbon performance, and more generally environmental performance, as a priority objective, for each portfolio. The installation, maintenance or replacement of more efficient equipment contributes directly to the reduction of greenhouse gas emissions from assets. The strong partnership dynamic, at the heart of the Group's strategy, is also an important lever for the achievement of objectives. In 2022, Covivio calculated the investments needed to achieve its GHG emission reduction targets in order to more accurately identify the risks and opportunities associated with its carbon footprint (3.2.1.1.3).

### Implementation of the tertiary decree in France

In France, the tertiary eco-energy scheme (attached to the "tertiary" decree), following the ELAN law, imposes a reduction in energy consumption of 40% by 2030, 50% by 2040 and 60% by 2050 for any building, part of a building or real estate complex of at least 1,000 m<sup>2</sup> GFA (gross floor area). This decree was supplemented by the "method" and "absolute values" decrees from 2020, which define final energy consumption thresholds (depending on the type, geographical area, etc.), expressed in absolute value (kWh/m<sup>2</sup>/year). These thresholds can be used as an alternative target to the -40% target, particularly for buildings that are already performing. Covivio has anticipated these measures in the context of discussions with tenants, in particular within the framework of the related environmental annexes committees. At the end of 2020/beginning of 2021, a first newsletter was distributed to more than 300 tenants to inform them of the implementation of this system, which introduces an obligation to report annually on energy consumption on the OPERAT platform (Observatoire de la Performance Énergétique, de la Rénovation et des Actions du Tertiaire), in a coordinated manner between lessor (common expenses) and lessee (tenant areas). Meetings were held with tenants on this subject, covering 100% of the hotels owned in France, under leases or as operating properties. The thresholds expressed in absolute value for the hotels were only published at the end of 2023, which delayed the launch of an audit to 2024 to analyse the conditions for achieving under the objectives of the decree and its orders.

### Adaptation of the work plan in accordance with the simulations/audits/studies of sources carried out

For the Covivio Hotels scope, priority is given to actions to improve the operation of hotels and to change the energy vector. Hotels have the specificity of high heat consumption to produce domestic hot water, which is often produced with a gas boiler. This represents 50 to 70 kWh/m<sup>2</sup>/year of thermal energy and is added to the heat consumption for winter heating. Fossil energy consumption can therefore represent 70% of total consumption and more than 80% of CO<sub>2</sub>e emissions, particularly in France where electricity is low-carbon.

Exiting fossils alone would enable Covivio Hotels to reach and exceed its 2030 target. However, this vision must be moderated: heat pump technologies to produce domestic hot water still lack maturity – this market segment is characterised by a lack of supply and uncompetitive costs – and old buildings make it difficult or impossible to replace boilers with heat pumps, in particular due to the size, bulk, noise pollution, weight and disproportionate price of such equipment when used in a poorly insulated building.

Therefore, the first objective is to validate the feasibility of phasing out fossil fuels for each asset and to identify the actions to be carried out beforehand. At the same time, action plans are being developed to implement GRMS (Guest Room Management System) solutions enabling detailed management of the energy consumed by unoccupied rooms, and for the modernisation of kitchen ventilation systems and catering areas, halls and meeting rooms. This optimised management enables the heating and cooling needs of these large spaces to be controlled. An adaptation of the ventilation rates to the actual occupancy of each room enables the energy consumption of hotels to be reduced by 15% to 20% (from the mid-scale ranges, the economy hotel sector is less affected because of the absence of additional services and smaller reception areas).

Hotels concerned by a complete renovation are subject to a more comprehensive analysis, before engineering and architectural work begins.

### 2025-2030 action plan to reduce the portfolio's carbon intensity

Gross source ⇒ Refined resource ⇒	Activated source
Audits targeting 5,000 metric tons in 2025	Actions targeting a reduction of 12,200 metric tons from 2025 to 2030
Directed audits: <ul style="list-style-type: none"> <li>● boiler replacement audit</li> <li>● retro-commissioning audit</li> <li>● pre-programme works audit</li> <li>● envelope audit (with thermal simulation)</li> </ul>	Actions identified covering 102% of the Covivio Hotels target Control of abatement costs: <ul style="list-style-type: none"> <li>● target €150 metric ton of CO<sub>2</sub> cut</li> <li>● on average €450 of green capex/metric ton of CO<sub>2</sub> cut</li> </ul>

#### 3.2.1.1.2.b Non-quantifiable levers

##### Engage with industry players on low-carbon issues

**HQE-GBC Alliance**<sup>(1)</sup>: Covivio, which has been a member of this association for many years, has actively collaborated on several projects on reducing the carbon footprint or concerning the circular economy. Covivio was a pioneer in the performance of life cycle analyses (LCA), and since 2010, it has naturally been a signatory and partner of the HQE Performance initiative. Covivio also participated in the NZC Rénovation project, which aims to identify specific levers for building renovation to reduce carbon emissions, as well as in the HQE 'Circular Economy Performance' test, which aims to assess the impact of actions in favour of the circular economy, including an LCA and a material flow analysis (MFA).

**Sekoya**<sup>(2)</sup>: Dedicated to the challenges of low-carbon construction and led by Impulse Labs in partnership with Eiffage, Sekoya is a Carbon & Climate platform whose purpose is to identify and promote low-carbon solutions for innovative

companies participating in the fight against climate change and the emergence of the city and sustainable infrastructure. This initiative has enabled Covivio and its subsidiaries to identify solutions to significantly reduce the carbon footprint of its development and renovation projects.

**Low-carbon specifiers hub**<sup>(3)</sup>: The Low-Carbon Specifiers Hub aims to pool resources for analysing and selecting low-carbon solutions in the building sector. Run under the aegis of IFPEB and Carbone 4, this initiative provides a collaborative platform which gives participants access to a range of tools, targeted services and information by material category, and provides support to building specifiers in developing low-carbon solutions. This initiative has enabled Covivio to improve its measurement of the carbon impact of certain products and materials, and help to raise awareness of these issues among its teams.

(1) HQE Performance Économie Circulaire test 2019 – Alliance HQE-GBC ([hqegbc.org](http://hqegbc.org))

(2) <https://www.sekoyacarboneclimat.com/>

(3) The low carbon expert hub – IFPEB

### Making a success of the environmental transition together

Covivio is aware of the need to involve its partners (customers, suppliers, etc.) to ensure that its environmental transition initiatives are successful, especially with regard to its 2030 carbon trajectory. "Building well-being and lasting ties": Covivio's Purpose reflects both this challenge and its know-how in this area.

Covivio has laid the foundations for an effective and constructive relationship, by implementing various concrete measures, such as green annexes and Sustainable Development Partnership Committees, in order to optimise the environmental performance of buildings. Covivio has been organising Sustainable Development Committees in France since 2010, as part of its special relationship with each customer. They facilitated and paved the way for implementing the environmental annex for 100% of leases for more than 2,000 m<sup>2</sup> of office or hotel space in France. This annex is also included in other leases that are not subject to this obligation, and reflects the parties' commitment to CSR issues: energy, carbon, water, waste, transport, biodiversity, etc. These exchanges help obtain the HQE Exploitation or BREEAM In-Use certifications, chosen in coordination with the tenants. They have also made it easier to implement the Eco Energy Tertiaire programme and the measures associated with the energy efficiency plan.

Another key lever of Covivio's transition plan is the Responsible Purchasing policy aimed at guaranteeing commitment by suppliers, presented in ESRS S2, section 3.3.2.2.1.

### 3.2.1.1.3 Investments made and planned to support the transition plan

In 2022, Covivio calculated the investments needed to achieve its GHG emissions reduction targets in order to more accurately identify the risks and opportunities associated with its carbon footprint.

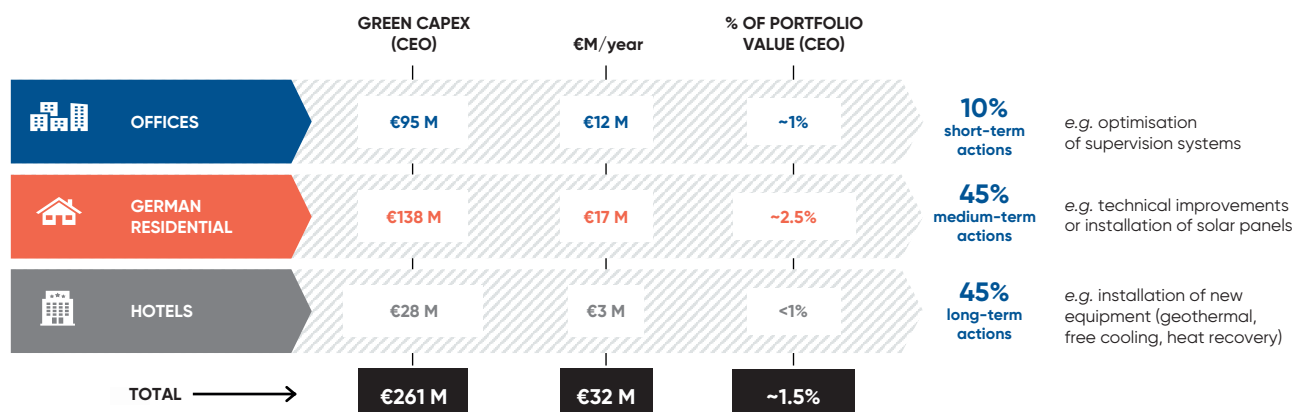
#### Methodology used

- Review of portfolio performance based on historical data and through interviews with operational staff, and energy audits (hotels Europe, Italy Offices, Germany Offices).
- Work was carried out in parallel in France in the context implementing the tertiary sector decree. This concerns the study conducted on the portfolio by E-nergy to verify the conformity of the assets with the objectives of the tertiary decree.

- In Germany: work was performed with an external service provider to set up a platform to monitor consumption and simulate green Capex at the asset level.
- Consolidation and extrapolation of the measures to be implemented to achieve the carbon targets by portfolio. All assets were included in the scope of study, some had in-depth energy audits, which were extrapolated to other assets. The measures identified were broken down as follows, in order to provide the best guidance for the multi-year work plans:
  - quickwins (ROI < 2 years): optimisation of building management systems, raising tenant awareness, sub-metering, equipment maintenance, occupancy sensors, automatic temperature adjustment according to the weather;
  - medium term (ROI 2-9 years): deployment of LED lights, heat pumps, more efficient heating equipment, installation of solar panels, solar protection systems;
  - long-term (ROI > 9 years): thermal insulation, replacement and modernisation of windows, installation of building management systems, installation or replacement of various equipment;
- the study also identifies the purchase of green electricity as an additional lever for reducing emissions.

The study resulted in the costing of a work plan of €261 million (Group share) for Capex to achieve the Group's carbon objectives, i.e. €32 million per year on average, enabling a 44% reduction in carbon intensity during the operation phase between 2020 and 2030 (year of study 2019 for hotels and 2021 for the France and Italy offices).

**In 2024, Covivio Hotels invested €136 million in acquisitions and Capex, 83% of which aligned with the European taxonomy.**



## Practical cases

### 1 - Novotel - Bruges

The hotel owned by Covivio Hotels and operated by WiZiU (Covivio's hotel management platform) was completely renovated in 2024. The works programme included €3 million in energy efficiency measures to phase out fossil fuels, a 52% reduction in greenhouse gas emissions, so that it is already below the CRREM 2030 threshold (1.5°C, Hotel real estate - Belgium). This programme includes:

- complete renovation of the energy system by installing heat pumps;
- low-energy ventilation systems with highly efficient energy recovery;
- intelligent extractor hoods above cooking spaces, dividing consumption by four.

In addition, a circular economy approach has been deployed to control the consumption of resources and reduce the carbon impact of renovation.

### 2 - B&B Frankfurt Offenbach

Capex co-financing plan of €210,000 between Covivio Hotels and B&B Hotels for this hotel let under a traditional lease, including the decarbonisation of hot water production permitting the complete electrification of the asset. This measure will avoid the emission of 11.4 metric tons of CO<sub>2</sub> per year and will provide valuable feedback for the entire B&B Germany portfolio.

#### 3.2.1.1.4 Locked-in GHG emissions

Potentially locked-in GHG emissions are mainly related to gas-powered equipment that is still in working order. Covivio incorporates this data into its projections and systematically studies the possibility of connecting its buildings to urban networks or installing heat pumps during renovations or when the gas equipment reaches the end of its life.

### 3.2.1.1.5 Alignment of investments supporting the transition plan to European taxonomy

#### Investments made in the operational portfolio

The investments aimed at supporting Covivio's transition plan are linked to the following activities as described in the European taxonomy:

#### 7.3 Energy efficiency equipment

- (a) addition of insulation to existing elements of the envelope, such as exterior walls (including green walls), roofs (including green roofs), attics, basements and ground floors (including measures to ensure airtightness, measures to reduce the effects of thermal bridges and scaffolding) and products for applying insulation to the building envelope (including mechanical fasteners and adhesives)
- (b) replacement of existing windows with new energy-efficient windows
- (c) replacement of existing exterior doors with new energy-efficient doors
- (d) installation and replacement of low-energy light sources
- (e) installation, replacement, maintenance and repair of heating, ventilation and air conditioning (HVAC) and water heating systems, including equipment related to district heating services, using high-efficiency technologies

#### 7.5 Energy performance measurement/regulation/control instruments and devices

#### 7.6 Installation, maintenance and repair of renewable energy technologies (photovoltaic, heat pumps)

#### 9.3 Professional services related to the energy performance of buildings



## Investments in the development portfolio

To achieve its goal of developing 100% buildings aligned with the taxonomy's mitigation target, projects must adhere to the following principles. A difference is made for new buildings depending on whether they are intended to be held in the portfolio or sold.

	Development for future ownership	Development for sale	
	Activity 7.7: Acquisition and holding of real estate assets (including new buildings for holding after delivery)	Activity 7.2: Building renovation	Activity 7.1: Construction of new buildings (development)
<b>TSC<sup>(1)</sup></b>	Construction permits before 31/12/2020: top 15% primary energy or EPC A (or B when A + B < 15% in the country concerned) Construction permit after 31/12/2020: NZEB -10%	30% reduction in primary energy consumption after works	NZEB - 10% (or equivalent national thermal regulation)
	For buildings > 5,000 m <sup>2</sup> : Installation of a BMS (power > 290 kW)/life cycle analysis/airtightness and thermal integrity test		
<b>DNSH</b>	DNSH Adaptation: Study of climate risks on an active scale for all activities and adaptation plan if risks are identified (Covivio uses MSCI for this study)		
	Other DNSHs for buildings and renovations: 3 - Water: ECAU label A or taps 6L/min/showers 8L/min/toilets 3-6L/min 4 - Biodiversity: environmental impact study including analysis of areas of interest in terms of biodiversity and potential mitigation and remedial measures 5 - Pollution: Class A products in terms of air quality, limitation of nuisances on the construction site and soil pollution study if necessary and REACH compliance 6 - Circular economy: waste management treatment, reporting and recovery target > 70% + building flexibility/modularity/recyclability study		
<b>MS</b>	Managed at Group level (Human Rights Policy)		

(1) TSC = Technical Screening Criteria/DNSH = Do No Significant Harm/MS = Minimum Safeguards

## 2024 results

In 2024, €5.1 million were invested to contribute to the environmental improvement of the portfolio in Europe.

	Share of revenue/revenue		Share of Capex/Capex	
	Aligned	Eligible	Aligned	Eligible
<b>Climate change mitigation</b>	<b>14.7%</b>	<b>46%</b>	<b>17.9%</b>	<b>100%</b>
<b>Climate change adaptation</b>	<b>0%</b>	<b>0%</b>	<b>83.2%</b>	<b>100%</b>

Given the nature of its activities, the determination of green Opex within the meaning of the taxonomy is not considered material. However, Covivio is identifying this topic for the future in connection with its project to standardise its information systems at the European level.

### The common thread, the example of L' Atelier:

On October 16, 2024, L'Atelier received the prestigious award from the Urban Land Institute (ULI) from among eight finalist projects. The ULI Europe Awards for Excellence is awarded by a jury of renowned professionals. It rewards exceptional urban development projects in the private, public and non-profit sectors located in countries in the EMEA region. This award recognizes the project's entire development process: planning, construction, economic viability, management, community impact, and design.

This award, which was presented in Barcelona at the C Change Summit, rewards the best practices and the most outstanding projects in the field of urban development. A prestigious distinction for L'Atelier, a creation resulting from an unprecedented collaboration between Covivio, STUDIOS Architecture and Maison Sarah Lavoine.



### 3.2.1.1.6 Significant investments in coal, oil and gas

Covivio has no significant Capex invested in economic activities related to coal, oil or gas. The only investments made in connection with these activities concern the maintenance of existing equipment.

### 3.2.1.1.7 "Paris Agreement" benchmarks

Covivio's business sector is not excluded from the "Paris Agreement" benchmarks.

### 3.2.1.1.8 Integration of the transition plan into the Group's strategy and financial planning

Covivio is paving the way for an environmental and social transition, with the full support of the Board of Directors, its CSR Committee, and with the strong commitment of its teams. The aim is to continue to transform the Company, its products, services and know-how, with an agility and a long-term vision that contribute to the Group's success and resilience (3.1.2.3.3). The transition plan is also included in the Group's financing strategy and is included in the due diligence phase for investment transactions (acquisition/development).

### 3.2.1.1.9 Approval of the transition plan by the governance bodies

Covivio's climate transition plan is at the heart of the Group's CSR strategy. It is promoted by governance as described in ESRS 2 in section 3.1.2.2. The climate issue has been on the agenda of all CSR Committee meetings since its creation.

### 3.2.1.1.10 The Group's main progress in implementing the transition plan

Covivio's different CSR objectives are presented in the CSR action plan (3.1.2.5). The progress of these objectives is detailed in the sections concerned, in particular the main indicators related to Covivio's climate change strategy:

- energy intensity of the portfolio (3.2.1.5): 179 kWhfe/m<sup>2</sup> at 31 December 2024, i.e. -14% compared to 2019 - Target -25% by 2035 (vs 2019);
- greenhouse gas emissions generated by the activity (3.2.1.6): 23.2 kgCO<sub>2</sub>/m<sup>2</sup> at 31 December 2024, i.e. -49% compared to 2010 - Target -70% by 2030 (vs 2010, in-use phase);
- certification of the European portfolio (3.1.3.4): 97.5% of buildings certified as of 31 December 2024 - Target 100% by 2025.

These structuring objectives for the Group's business are key to achieving the transition plan.

### 3.2.1.1.11 Disclosure requirement related to material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

The dual materiality analysis revealed three main issues in this ESRS, and all three are considered to be material after of the analysis:

ESRS E1 - CLIMATE CHANGE ADAPTATION	
<b>Description/key words</b>	Building resilience to climate change Physical climate risk assessment, water management
<b>Main impacts</b>	The impact on people's safety and well-being can be significant in the event of poor adaptation. Buildings can also contribute to increasing the effects of climate change through air conditioning equipment or land artificialisation. Positive impact: at the regional level, participation in urban resilience, for example by combating the effects of urban heat islands
<b>Positioning in the value chain</b>	Upstream, direct and downstream operations
<b>Main risks</b>	Physical risk: Occurrence of a natural disaster: submersion, flooding, extreme temperatures, heat waves, etc. These risks can lead to the total destruction of an asset. Financial risk: risk of obsolescence or devaluation of certain assets; Increased costs (renovation, operations and insurance)
<b>Main opportunities</b>	Increase portfolio resilience
<b>Materiality</b>	Material
ESRS E1 - CLIMATE CHANGE MITIGATION	
<b>Description/key words</b>	TCFD/Climate Governance/Stakeholder relations Awareness of the Climate Strategy/Low-carbon construction and management Carbon trajectory and decarbonisation scenarios Net Zero Carbon Contribution Sustainable mobility and responsible practices of employees and occupants
<b>Main impacts</b>	Strong sectoral impact: buildings account for 28% of French emissions. The impact index is considered highest here due to the frequency of climate events, which can be observed each year to varying degrees and in different locations. Current policies are moving us towards + 3.2°C. Pressure on available resources (energy, water), particularly in certain areas. Positive impact: participation in the energy renovation of the portfolio

<b>Positioning in the value chain</b>	Upstream, direct operations, downstream
<b>Main risks</b>	Substantial financial and reputational risk of a class action suit in the event of inaction on climate change Risk to the attractiveness of buildings related to the increase in expenses for customers Risk to the liquidity of the asset in a regulatory context encouraging the energy efficiency of buildings
<b>Main opportunities</b>	Liquidity of the asset Strengthening competitiveness: Attractiveness of Covivio for its partners Added value for customers and cost savings
<b>Materiality</b>	Material

#### ESRS E1 – ENERGY

<b>Description/key words</b>	Environmental certifications and specific labels Smart building Building flexibility and mixed use
<b>Main impacts</b>	For REITs, the environmental impact can be greatest if the building uses fossil fuels and/or energy-intensive energy sources. Energy consumption represents 40% of the carbon weight of a building in France (up to 60% in other countries due to a more carbon-intensive national energy mix), and the impact on the environment is therefore significant. Positive impact: participation in the energy renovation of the portfolio
<b>Positioning in the value chain</b>	Direct and downstream operations
<b>Main risks</b>	Financial risk: Rising energy costs may accelerate asset obsolescence by reducing their liquidity Cost of alignment and implementation of the new RE2020 regulation
<b>Main opportunities</b>	Liquidity of the asset Strengthening competitiveness Attractiveness of Covivio for its partners Added value for customers and cost savings
<b>Materiality</b>	Material

The interactions of the issues with the strategy and business model are presented in ESRS 2, in section 3.1.2.3.3. The following section presents the resilience analyses conducted at Group level to provide input for the mitigation and adaptation plans.

#### 3.2.1.1.12 Description of the process to identify and assess material impacts, risks and opportunities related to climate change (ESRS 2 – IRO-1)

##### Risk management

In 2018, a CSR risk mapping was carried out, validated by the Management Committee, to identify the inherent and residual risks affecting Covivio's different activities. Among the CSR risks identified, the "Obsolescence of assets/Green value/Products reflecting societal trends", "Control of operating expenses" and "Environmental safety/security/regulatory compliance" risks are climate-related risks. The plans for managing these risks are set out in their respective sections. These two maps are regularly updated.

In 2020/2021, a risk map of procurement-related risks (3.3.2.1.1) was drawn up by the Sustainable Development Department, in coordination with the Risk, Compliance, Audit and Internal Control Department.

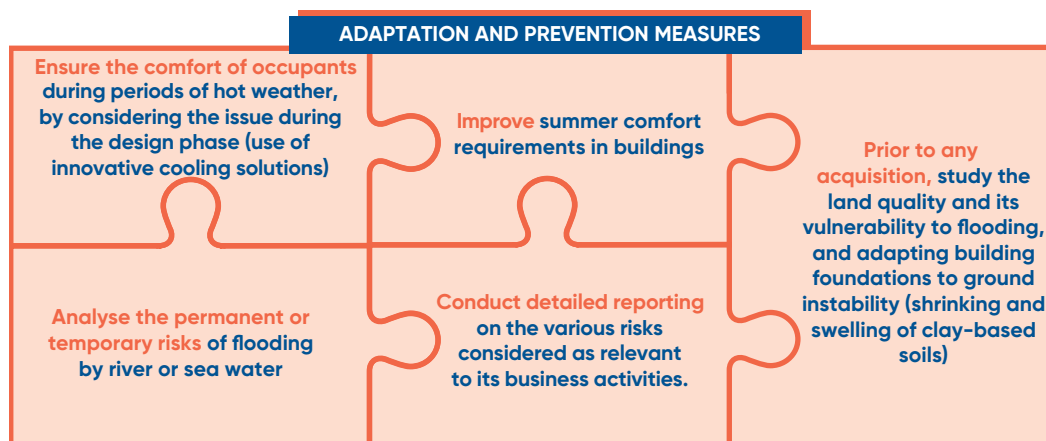
In 2021, Covivio updated its risk mapping at Group level, including all its subsidiaries and activities. The results were presented and shared with the Covivio Audit Committee in September 2021. This enabled a review to be performed of the improvement in the level of control of the risks for which specific action plans have been drawn up and implemented, and to share the levels of control and the action plans put in place for the company's major risks.

Climate-related risks and opportunities are analysed over time horizons presented in ESRS 2, section 3.1.2.4. However, the preferred horizon for these aspects remains the long and very long term, in order to have a complete vision of the issues. For example, the MSCI Climate Value at Risk analysis provides a vision at 2030/2050/2100 by using different scenarios, favouring a 1.5°C scenario (REMIND or CRREM) for transition risks and a worst-case scenario (RCP 8.5) for physical climate risks.

## Climate-related risks

	Risks	Description of risks	Potential financial impact	Covivio's strategy	Metrics monitored
Physical risks	<b>Extremes (medium term)</b>				
	Climatic phenomena: <ul style="list-style-type: none"> <li>storms</li> <li>hail</li> <li>fires</li> <li>flood</li> <li>drought</li> </ul>	Physical destruction including destruction of assets Transport blockage Difficulties in water and energy supply	<b>Construction</b> <ul style="list-style-type: none"> <li>loss of assets</li> <li>repair or replacement costs</li> <li>construction delays</li> </ul> <b>Operations:</b> <ul style="list-style-type: none"> <li>loss of assets</li> <li>loss of value</li> <li>business interruption</li> </ul>	Gradual adaptation of the portfolio Targeted resilience studies Choice of location Arbitration	Reporting on environmental risks Percentage of certified buildings (HQE, BREEAM, LEED, etc.) Energy consumption CO2 emissions
	Temperature variations: <ul style="list-style-type: none"> <li>heat wave</li> <li>cold snap</li> </ul>	Loss of thermal comfort Risk to tenant health	<b>Construction:</b> <ul style="list-style-type: none"> <li>sizing of heating/cooling systems</li> <li>additional costs</li> </ul> <b>Operations:</b> <ul style="list-style-type: none"> <li>increase in operating costs</li> <li>fall in occupancy rate</li> <li>Reduction in rents</li> </ul>	Analysis of the sizing of equipment/facilities Monitoring and anticipating regulations	
	<b>Chronic (long-term)</b>				
	Increase in temperatures	Deterioration in air quality Insect proliferation Destruction of green spaces	<b>Operations:</b> <ul style="list-style-type: none"> <li>operational costs</li> </ul>	Biodiversity Charters BiodiverCity label Green space objective	Energy consumption CO2 emissions
	Rising water levels	Submersion of assets	<b>Operations:</b> <ul style="list-style-type: none"> <li>loss of assets</li> <li>business interruption</li> </ul>	Arbitration Choice of location Targeted resilience studies	Portfolio submersion study/statistics
Transition risks	<b>Political and legal (medium term)</b>				
	Fossil energy/carbon taxation	Implementation of carbon taxation on construction, emitting buildings or fossil fuels	<b>Construction:</b> <ul style="list-style-type: none"> <li>cost increase</li> </ul> <b>Operations:</b> <ul style="list-style-type: none"> <li>cost increase</li> </ul>	Low-carbon construction policy Calculation of the CO2 impact of the choice of materials	Percentage of buildings certified
	Regulatory changes	Risk of non-compliance	<b>Operations:</b> <ul style="list-style-type: none"> <li>legal risks resulting in penalties and additional costs</li> </ul>	Calculation of the CO2 impact of energy efficiency actions	Amount of penalties
	<b>Market development (long term)</b>				
	Obsolescence	Loss of attractiveness of the portfolio	<b>Operations:</b> <ul style="list-style-type: none"> <li>increase in operating costs</li> <li>decrease in liquidity</li> </ul>	Refurbishment policy	Percentage of buildings certified
	Economic slowdown	Fall in purchasing power	<b>Operations:</b> <ul style="list-style-type: none"> <li>inability to pay rent</li> </ul>	Diversification policy	Revenues by activity/ by country...
	Demand for responsible buildings	Reputational risks	<b>Operations:</b> <ul style="list-style-type: none"> <li>loss of attractiveness of assets</li> </ul>	Building certification	Percentage of buildings certified

In addition to compliance with local regulations (example in France: ERP – Statement of Risks and Pollutions), Covivio has identified the main hazards that could impact its activities and has implemented the prevention and adaptation measures described in the following diagram. The Nature report published in 2024, aligned with the TCFD and TNFD recommendations. It also offers an insight into the strategy implemented by Covivio to address the consequences of climate change.



Covivio's responses to the challenges of building resilience are twofold: firstly, reduce its impacts and its environmental footprint, and secondly, adapt to climate change through an eco-design approach that anticipates its consequences. Resilience can also be improved by changing the conditions for using the building, by involving users in the choice of the layout of the premises, the implementation of a public transport policy, teleworking, flexible working hours, videoconferencing, Green IT solutions, etc.

A series of studies on exposure and vulnerability to risk were carried out in order to assess the capacity of buildings to withstand the consequences of climate change. Over the years, these studies have enabled the exposure and/or potential impact on rental value to be assessed. The main conclusions are as follows:

- According to the MSCI study performed annually since 2021, the main risks that Covivio's portfolio will have to face are river and coastal flooding and heat waves (see below). However, an internal study revealed, based on tertiary real estate and a representative sample of German residential, that only 2% of assets (in value) were exposed to the risk of a one-metre rise in sea levels.
- The WRI study conducted on the portfolio showed that 21.7% and 9.5% of the water reporting scope are respectively in high and very high risk areas, i.e. 21% and 14.4% of water consumption reported to 2023 (ESRS E3 in section 3.2.1.3.).
- According to the mapping of the proximity of the portfolio to protected areas, 42% of Covivio sites are located less than one kilometre from a protected area, 25% are less than 500 m away and five sites are located directly within these areas (ESRS E4 in section 3.2.4.3.1.).

These studies have resulted in several recommendations to strengthen the subject of resilience in the study of assets, particularly in the due diligence phase preceding investments (development or acquisition), and to guide climate, water and biodiversity commitments.

#### Climate and physical risk studies

Covivio carried out a new version of the climate risk analysis of its portfolio at the end of 2023 with MSCI Real Assets.

The entire Covivio Hotels portfolio (excluding retail and real estate) was analysed to measure the financial impact of physical and transition risks on the value of each asset and at the portfolio level.

#### An in-depth version of the analysis

The analysis carried out goes further than previous editions in classifying risks and specifying their time horizon thanks to new functionalities in the MSCI Real Assets Climate model.

Physical and transition risk analyses are now performed over several time horizons: 2030, 2040, 2050 and 2100. The number of physical risks analysed was extended in 2024 from 6 to 11 in order to better align with European regulations, including the Taxonomy. MSCI is also studying the possibility of adding new risks related to the European taxonomy, in particular concerning soils (erosion, landslides, etc.).

The financial impact is calculated for all the following physical risks: floods, violent winds from cyclones, extreme hot and extreme cold, wildfires.

MSCI Real Assets has also adopted a new third-party flood model (Fathom) with more accurate resolution and elevations.

The analysis is based on actual data from Covivio buildings: location, surface area, building type, energy consumption, CO<sub>2</sub> emissions, Energy Performance Certificate (EPC).

As Covivio has an 89% coverage of real energy consumption, the Energy Performance Certificate (EPC) is used in the absence of energy consumption data to refine the method used for the 11% of assets that do not have real data.

## Physical risk analysis

### 11 physical risks analysed <sup>(1)</sup>

Extreme physical risks		
Risk	Qualification	Nature of costs
Coastal flooding	Flood level (metres)	Damage to assets Business interruption or loss of income from real estate
River flooding		
Rain flooding		
Tropical cyclones	Wind speed (metres/ second)	Damage to assets Business interruption
Wildfire	Probability of fire (% annual)	Damage to assets Business interruption or loss of income from real estate

Chronic physical risks		
Risk	Qualification	Nature of costs
Extreme cold	Number of days < 0°C and < -10°C	Operating costs related to heating the building
Extreme heat	Number of days > 30°C and > 35°C (dry air measurement)	Operating costs related to building cooling
Extreme snowfall	Number of days with falls > 5 cm and > 20 cm	Not quantified in the model
Extreme precipitation	Number of days with precipitation > 20 mm and > 50 mm	
Wind gusts	Number of days with gusts > 24 m/s and > 28 m/s	
Water stress	Number of days > 60% and > 100% water stress	

### Financial impact of physical risks over different time horizons

	Portfolio			
	2030	2040	2050	2100
Physical VaR [% value]	-0.08%	-0.22%	-0.33%	-0.49%

Source: MSCI Real Assets.

According to a 3°C I REMIND I Current policies scenario, the Climate Value-at-risk of Covivio Hotels' portfolio is -0.33% by 2050 and -0.49% by 2100.

The main physical risks for the portfolio are coastal flooding (-0.23%) and rain (-0.20%), with a level of financial impact categorised as "negligible" overall.

In the previous version of the analysis and according to the same scenario, the Climate Value-at-Risk was -0.41% by 2100. The reduction is explained by the revision of the flood risk analysis model, which enabled the risk exposure for certain assets to be revised downwards.

In terms of comparisons, the Covivio Hotels level of financial risk by 2050 is lower than that of the MSCI Europe Annual Universe (containing more than 35,000 assets analysed), which is -0.48%.

According to a 5°C CPI scenario, the value of the physical risk increases to -0.45% in 2050, a level which is also qualified as "negligible".

### Level of financial impact for transition risk

The transition risk analysis is based on actual energy consumption data for 89% of Covivio's assets.

According to a 1.5°C REMIND Net Zero scenario, the portfolio is aligned with the 2023 reduction target.

### Financial impact of the transition risk over different time horizons, per sector:

	Portfolio			
	2030	2040	2050	2100
Transition VaR [% value]	-0.33%	-1.90%	- 4.07%	- 4.07%

Source: MSCI Real Assets.

Overall, the financial impact of the transition risk is -4.07% by 2050 and -0.33% by 2030. Most of the risk is expected between 2040 and 2050.

The level of risk for the overall portfolio by 2050 is lower than that of the MSCI Europe Annual Universe (containing more than 35,000 assets analysed), which is -4.70%.

(1) Source: MSCI Real Assets: for more details on the methodology, contact: realestate@msci.com

*Scale of the risk level according to the MSCI Real Assets methodology, in % of the portfolio value:*

-100% – -25%	-25% – -5%	-5% – -0.5%	-0.5% – 0%	0%	0% – 0.5%	0.5% – 100%
Severe	Important	Moderate	Negligible	Not identifiable	Negligible reduction	Reduction

### 3.2.1.2 Policies related to climate change mitigation and adaptation (E1-2)

#### Climate Governance

Covivio's governance and organisation are structured to address climate issues strategically. The various bodies presented below have clearly defined roles in order to ensure the implementation of Covivio's objectives in this area.

- The Board of Directors, directly or *via* its CSR Committee, monitors the risks and opportunities related to climate change, by monitoring the company's CSR performance and the strategic orientations given to the Group. The Chief Executive Officer (CEO) himself deals with sustainable development and climate change issues on the Board, supported by experienced Directors on CSR topics. A CSR Committee was created in 2021 to formalise the Board's commitment to sustainable development issues. Its purpose is to assist the Board to conduct its work on CSR, in order to enable it to go further in the analysis of environmental, social and societal issues. Climate change evidently occupies an important place among the subjects dealt with by the CSR Committee.
- The Executive Committee is in charge of deploying the Group's strategy, notably to implement the Group's climate objectives. The members of the Executive Committee have targets set for them in connection with this action plan, particularly in terms of their variable remuneration. The CSR targets included in the remuneration of the Chief Executive Officer (CEO) and the Deputy CEO were detailed in 2023 and supplemented in 2024, following the recommendations of the CSR Committee. They represent a weight of 30%. The portfolio's certification rate and the objectives connected to the carbon trajectory are included in the Long-Term Incentive Plan for corporate officers, at a rate of 15% (ESRS 2, section 3.1.2.2.4).
- The Sustainable Development Department proposes and coordinates actions to combat climate change in the Group's activities, with the support of General Management and the CSR Committee. The Sustainable Development Department works closely with the Executive Committee to implement the action plans decided upon.

## MDR-P table

Policy	A description of the main elements of the policy, including its general objectives and the material impacts, risks and opportunities to which the policy relates and the monitoring procedure;	A description of the policy framework, or its exclusions, with respect to activities, the upstream and/or downstream value chain, geographical scope and, where applicable, groups of affected stakeholders;	The highest management level in the company's organisation that is responsible for implementing the policy;	Scenarios used	A reference, where applicable, to the standards or third-party initiatives that the company undertakes to respect throughout the implementation of the policy	Where appropriate, a description of how the interests of the main stakeholders were taken into account in policy-making; and	Where applicable, how the company shares the policy with potentially affected stakeholders, as well as stakeholders who need to participate in its implementation.
<b>(a) Climate change mitigation</b>	All of these topics are covered by the Group's climate strategy (see E1-1). The Group-wide MSCI Climate VAR study covers both adaptation and mitigation. The carbon trajectory aims to mitigate Covivio's impact on climate change, by including the energy efficiency of buildings and decarbonisation of the energy mix of buildings by using renewable energy. Targets: -40% carbon intensity between 2010 and 2030 (Scopes 1, 2, 3) -25% primary energy intensity in the tertiary portfolio 100% green electricity in directly managed offices Doubling solar energy production between 2023 and 2030	Upstream Direct operations (including all buildings under direct management) Downstream	See governance diagram for sustainable development issues (ESRS 2). - At the executive level: The Sustainable Development Steering Committee composed of: Chief Executive Officer (CEO) Chief Operating Officer SD Department - At the Board of Directors' level: the CSR Committee	Scenarios 1.5°C, WB2D, CRREM 1.5°C (as a benchmark, particularly in the context of Green Bonds)	References: Stakeholder involvement in the Group's transition plan Employees: ESRS S1 Suppliers: ESRS S2 Customers: ESRS S4 Investors/Banks: Taxonomy and sustainable finance In addition, Covivio is a member of various sectoral and cross-sectoral initiatives, such as the Global Compact, the HQE-GBC Alliance, the OJD, the BBKA association, Orée, the Hub des Prescripteurs Bas Carbon (Low Carbon Prescribers Hub) (ESRS 2). Covivio is also a signatory of the following charters: - EcoWatt Charter - the "Connected buildings, solidarity and human buildings" Charter - Charter of commitment to energy efficiency in commercial buildings		
<b>(b) Climate change adaptation</b>		Upstream Direct operations Downstream		RCP 2.6 to 8.6			
<b>(c) Energy efficiency</b>		Direct operations Downstream		CRREM (as a benchmark)			
<b>(d) Deployment of renewable energy</b>		Direct operations (with reinforced objectives on the direct management scope) Downstream					
<b>(e) Environmental certification of buildings</b>	100% of assets certified by 2025 100% of new developments aiming for > Excellent/Gold certification	Direct operations Downstream Excluding non-core buildings					
<b>(f) Raising awareness of customers and end-users</b>	100% of new leases including a green clause in office leases Raising awareness of customers and end users via the usual communication channels (welcome booklet, building application)	Direct operations Downstream					





### 3.2.1.3. Actions and resources in relation to climate change policies (E1-3)

	Main objective	Governance and scope	Actions	Deployed resources	Financial instruments and link with taxonomy
Climate change mitigation	-40% carbon intensity between 2010 and 2030 (Scopes 1-2-3)	E1-2	E1-1.B	E1-1.C	See Taxonomy and sustainable finance section Taxonomy: Mitigation objective: taxonomy real estate activities (7.1 to 7.7 + 9.3) GB framework: eligibility criteria
Climate change adaptation	100% of the portfolio is covered by a physical climate risk analysis		E1-1.L	Study costs Adaptation measures directly included in project costs for developments	Taxonomy and sustainable finance section Adaptation objective: taxonomy real estate activities (7.1 to 7.7 + 9.3)
Energy efficiency	-25% final energy intensity in the portfolio between 2019 and 2035		Section: E1-1 "Improving portfolio energy efficiency"	E1-1.C	See Taxonomy and sustainable finance section Taxonomy: Mitigation objective: taxonomy real estate activities (7.2 to 7.7) GB framework: eligibility criteria
Deployment of renewable energy	Doubling the photovoltaic capacity by 2030 across the Covivio Group		E1-1.B		See Taxonomy and sustainable finance section Taxonomy: Mitigation objective: taxonomy real estate activities (4.1) GB framework: eligibility criteria
Environmental certification of buildings	100% of buildings certified by 2025 and 100% of developments aiming for ≥ Excellent/Gold certification		ESRS Sector challenge	Certification fees	See Taxonomy and sustainable finance section GB framework: eligibility criteria
Raising awareness of customers and end-users	100% of new leases including a green clause in the leases		E1-1.B	Human resources and satisfaction surveys	See Taxonomy and sustainable finance section Taxonomy: Minimum safeguards GB framework: minimum criteria

#### Nature-based solutions

Among the solutions proposed in the transition plan, Covivio identifies the creation of greened spaces in the city as a lever for environmental performance for its buildings, but also for the district by helping to combat the urban heat island effect (concrete can reach 60 to 70°C, whereas a green roof rarely exceeds 20°C). Greened terraces have several advantages: in terms of biodiversity by recreating ecological continuities, water management by increasing rainwater retention, air quality through photosynthesis (according to the CSTB, 1 m² of green roof captures around 0.2 kg of airborne particles per day), but also for the building by providing sound and heat insulation and by acting as a protective barrier for the building by minimising thermal shocks.

### 3.2.1.4 Targets related to climate change mitigation and adaptation (E1-4)

#### MDR-T table

#### Target -40% Group 2010-2030

(a) A description of the relationship between the target and the objectives of the policy	Central objective of the Group's transition plan (E1-1A)
(b) The level to be achieved, including, where applicable, whether it is an absolute or relative target, as well as the unit in which it is measured	<p>40% carbon intensity per m<sup>2</sup> owned Scopes 1-2-3 (total emissions) between 2010 and 2030 (kgCO<sub>2</sub>e/m<sup>2</sup>/year)</p> <p>This intensity target was obtained taking the revision of the absolute SBTi targets for 2021 set between 2015 and 2030 into account:</p> <p>-63% Scopes 1-2 (1.5°C) -37.5% (Scope 3) (WB2D)</p>
(c) The outline of the target, including the company's activities and/or its upstream and/or downstream value chain, if applicable, and geographical boundaries	<p>Scope 1 - direct GHG emissions resulting from the combustion of direct energy sources used in company buildings. For Covivio, this corresponds to the consumption of natural gas, wood and fuel in its directly operated buildings (head office and common areas of multi-tenant office buildings).</p> <p>Scope 2 - indirect emissions related to the purchase of electricity, heating and cooling. For Covivio, this corresponds to the consumption of electricity and the heating and cooling networks in directly managed buildings. Scope 2 GHG emissions are calculated on a market basis.</p> <p>Scope 3 - other indirect emissions from purchased goods and services and assets let downstream. - Purchased goods and services include emissions from the extraction, production and transportation (i.e. design-to-delivery) of goods and services acquired by a company during the reporting year, which are not included in another upstream category. For Covivio, these are emissions related to the construction/renovation of buildings (based on actual deliveries and data modelled with Covivio's consultant CSTB, they include building emissions amortised over a period of 50 years). This includes all items related to the construction/renovation of buildings.</p> <p>- Downstream leased assets include the operation of assets owned by the company (lessor) and leased to other entities during the reporting year, not included in scopes 1 and 2 - reported by the lessor. For building owners (including operators and managers), emissions from assets leased to other organisations during the reporting year.</p>
(d) The baseline and the baseline year against which progress is measured	<p>In intensity:</p> <p>2010: 76.3 kgCO<sub>2</sub>e/m<sup>2</sup>/year 2030: 45.9 kgCO<sub>2</sub>e/m<sup>2</sup>/year</p> <p>In absolute value:</p> <p>2015 = 433,298 tCO<sub>2</sub>e (Scope 3) 2015 = 21,242 tCO<sub>2</sub>e (Scopes 1-2) Annual measurement (E1-6)</p>
(e) The period covered by the target and, if applicable, any milestones or intermediate objectives	2010-2030
(f) The methods and main assumptions used to define the targets, including, where applicable, the selected scenario, data sources, alignment with national, EU or international strategic objectives and how targets take into account the broader sustainable development context and/or local context in which impacts occur	<p>See point c) and validation of the objectives in absolute value used as a reference for the intensity objective by the SBT initiative.</p> <p>Contribution to the UN SDGs:</p> <p>SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable.</p> <p>SDG 13: Take urgent action to combat climate change and its consequences.</p> <p>Cf. E1-6 for carbon accounting methodology.</p>
(g) Whether the company's environmental targets are based on conclusive scientific evidence	Trajectories 1.5°C (Scopes 1-2) and Well-below 2°C (Scope 3)
(h) How involved were stakeholders in setting targets, if any, for each material significant sustainability issue	E1-1.B/E1-1.I
(i) Any change in the targets and corresponding metrics or in the underlying measurement methods, key assumptions, limitations, sources and data collection process, within the defined time horizon. This includes the reasons for these changes as well as an explanation of their effect on comparability (see disclosure requirement BP-2 Disclosure of information relating to special circumstances of this standard)	E1-1.A and E1-6
(j) The results compared to the stated targets, including information on how the target is monitored and reviewed, and the metrics used, whether progress is in line with what was originally planned, and an analysis of trends or major changes in the results recorded by the company to reach the target	-28% at the end of 2024



The achievement of this target is directly linked to two other objectives, directly related to the material IROs identified:

- the reduction in the portfolio's energy consumption (3.2.1.5);
- environmental certification of buildings (3.1.3.4).

This Group objective is broken down operationally into sub-objectives as presented in the action plan (ESRS2, 3.1.2.5), in particular via objectives relating to operations for each portfolio:

Portfolio	2030 objective (Operational carbon trajectory)	% 2010/2030	Achieved at the end of 2024	Reference 1.5°C CRREM intensity
Hotel real estate Europe	14.6 kgCO <sub>2</sub> e/m <sup>2</sup> /year	-70%	23.2	34.5 (weighting by country of presence)

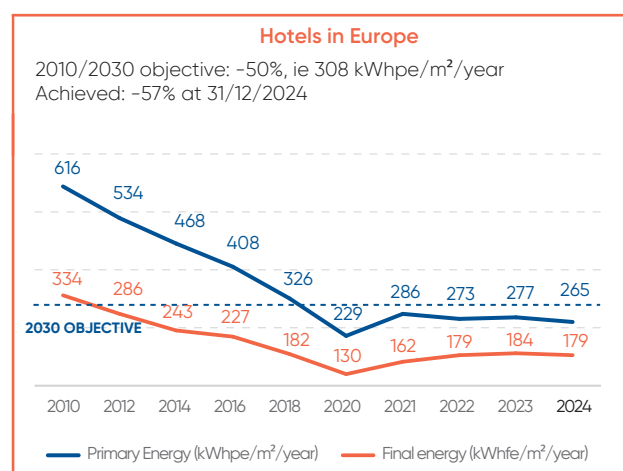
### 3.2.1.5 Energy consumption and mix (E1-5)

#### Changes in the energy consumption of the different portfolios

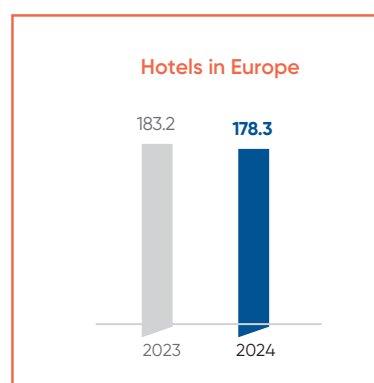
The energy consumption across the whole portfolio decreased in 2024 to 179 kWhfe/m<sup>2</sup> in absolute terms. On a like-for-like scope basis, consumption decreased by 4% for the whole portfolio. This reduction is linked to the continued efforts made by Covivio and its customers to ensure energy efficiency in its buildings. It should also be noted that the climate correction was negative this year because 2024 was mild in climate terms in the Group's main locations (intensity at 169 kWhfe/m<sup>2</sup> without climate corrections).

It should also be noted that primary energy intensity is falling faster than the final energy intensity this year, mainly due to the increase in the use of green electricity.

The coverage rate is also up to 96% and includes 3% of estimated data. These estimates are mainly estimates for the months at the end of the year (invoices not received at the reporting date). In order to reconcile the data with the financial scope, a collection was initiated in 2024 on atypical assets (i.e. those with a different use to the portfolio to which they belong) and assets delivered recently, acquired or sold during the year. This data has been added to a separate category and reported at the bottom of the consumption table presented below, to ensure continuity with previously published reports.



#### Change in energy consumption on a like-for-like scope for the portfolios (in kWhfe/m<sup>2</sup>)



## Consolidated environmental data (Abs)

ENERGY - ABSOLUTE CONSUMPTION	GRI	EPRA best practices recommendations	HOTELS OPERATING PROPERTIES	HOTEL LEASE PROPERTIES	TOTAL PORTFOLIO	
			2024	2024	2023	2024
Coverage of the reporting scope by surface area (m²)			564,151	1,034,881	1,670,447	1,599,032
<b>Coverage of the reporting scope by surface area (%)</b>			<b>99%</b>	<b>95%</b>	<b>91%</b>	<b>96%</b>
Coverage of the scope coverage (number of buildings)			53/54	215/225	288/308	268/279
Proportion of estimated consumption data			2.8%	2.8%	-	2.8%
<b>Intensity (kWhfe/m²/year)</b>		<b>Energy-Int</b>	<b>183.6</b>	<b>177.1</b>	<b>183.6</b>	<b>179.4</b>
<b>Intensity (kWhfe/m²/year)</b>			<b>276.5</b>	<b>259.2</b>	<b>276.8</b>	<b>265.3</b>
<b>Total direct energy (kWhfe)</b>		<b>Fuels-Abs</b>	<b>19,259,906</b>	<b>62,863,149</b>	<b>94,237,764</b>	<b>82,123,055</b>
Natural gas (direct energy) - non-renewable source			16,651,621	62,564,189	90,676,759	79,215,810
Natural gas (direct energy) - renewable source			794,546	-	1,403,277	794,546
Fuel oil (direct energy)			1,813,739	298,959	2,157,729	2,112,698
Wood (direct energy)			-	-	-	-
<b>Total indirect energy (kWhfe)</b>		<b>Elec-Abs</b>	<b>84,317,172</b>	<b>120,384,303</b>	<b>212,373,486</b>	<b>204,701,475</b>
Electricity (indirect energy) - non-renewable source			40,246,076	63,658,576	131,151,119	103,904,652
Electricity (indirect energy) - renewable source			4,093,466	3,123,362	-	7,216,829
Electricity (indirect energy) - renewable source - guarantees of origin			11,740,905	43,323,658	42,161,780	55,064,563
Solar energy production (resold, not accounted for)			23,277	18,266	94,571	41,543
District heating (indirect energy) - non-renewable or non-traced origin		<b>DH&amp;C-As</b>	20,361,170	6,752,394	35,876,092	27,113,564
District heating (indirect energy) - renewable origin			6,926,611	2,706,482	-	9,633,093
Cooling networks (indirect energy) - non-renewable or non-traced origin			655,721	566,503	3,184,495	1,222,223
Cooling networks (indirect energy) - renewable origin			293,224	253,327	-	546,551
<b>Total energy consumption (kWhfe)</b>			<b>103,577,078</b>	<b>183,247,451</b>	<b>306,611,251</b>	<b>286,824,529</b>
of which renewable sources			23,848,752	49,406,830	43,565,057	73,255,582
Total energy consumption (in GJ)			372,877	659,691	1,103,801	1,032,568
<b>Total energy consumption (kWhpe)</b>			<b>156,003,745</b>	<b>268,282,183</b>	<b>462,317,656</b>	<b>424,285,927</b>
Total energy consumption (in kWhfe) extrapolated to the reporting scope (in kWhfe)			105,097,637	192,700,079	337,115,005	297,797,716
Total energy consumption (in kWhfe) extrapolated without climate adjustments			96,335,293	174,265,664	325,443,763	270,600,957
<b>Reconciliation with financial statements</b>						
Residual consumption of vacant buildings			-	-	-	-
Consumption of retail and atypical assets (in kWhfe)			-	-	35,340,767	33,829,864
Prorated consumption of assets delivered, acquired or sold during the year			-	-	35,172,015	33,668,326
<b>Total extrapolated energy consumption + consumption outside the reporting scope (in kWhfe)</b>			<b>105,097,637</b>	<b>192,700,079</b>	<b>407,627,787</b>	<b>365,295,906</b>

The CSRD now requires consumption to be distributed according to the source of its production. The share of renewable energy in the network is thus indicated here based on the energy mix provided by suppliers, or failing this by using the residual mix. This year, the extrapolated data for tenant areas are directly included in the scope, in order to give a complete view of the buildings. The data are given in kWh and not in MWh.

## Consolidated environmental data (LfL)

ENERGY - LFL CONSUMPTION	OPERATIONAL CONTROL			TOTAL PORTFOLIO		
	2023	2024	Change	2023	2024	Change
Coverage of the reporting scope by surface area (m <sup>2</sup> )	510,637			1,464,064		
Coverage of the reporting scope by surface area (%)	92%			89%		
Total Electricity (in kWh) (Elec-LfL)	51,670,464	52,573,259	1.7%	150,512,641	152,336,139	1.2%
Total heating and cooling networks (in kWh) (DH & C-LfL)	25,088,085	25,145,338	0.2%	30,207,440	34,652,354	14.7%
Total gas-fuel oil-wood (in kWh) (Fuel-LfL)	21,377,179	18,930,828	-11.4%	87,511,718	74,056,819	-15.4%
<b>Total consumption (in kWhfe) (Energy-Int)</b>	<b>98,135,727</b>	<b>96,649,426</b>	<b>-1.5%</b>	<b>268,231,799</b>	<b>261,045,313</b>	<b>-2.7%</b>
<b>Total consumption (in kWhpe)</b>	<b>155,001,961</b>	<b>147,152,720</b>	<b>-5.1%</b>	<b>403,808,320</b>	<b>386,945,639</b>	<b>-4.2%</b>
<b>Intensity (kWhfe/m<sup>2</sup>/year)</b>	<b>192.2</b>	<b>189.3</b>	<b>-1.5%</b>	<b>183.2</b>	<b>178.3</b>	<b>-2.7%</b>
<b>Intensity (kWhfe/m<sup>2</sup>/year)</b>	<b>303.5</b>	<b>288.2</b>	<b>-5.1%</b>	<b>275.8</b>	<b>264.3</b>	<b>-4.2%</b>

## Energy mix

YEAR	Operational control (operating properties)	TOTAL PORTFOLIO
	2024	2024
Green electricity contract in total electricity consumption	21%	33%
Share of renewable sources in total energy consumption	23%	26%

YEAR	Group
	2024
(1) Fuel consumption from coal and coal-based products (in MWh)	8,877
(2) Fuel consumption from crude oil and oil products (in MWh)	2,780
(3) Fuel consumption from natural gas (in MWh)	99,096
(4) Fuel consumption from other fossil sources (in MWh)	0
5) Consumption of electricity, heat, steam and cooling purchased or acquired from fossil sources (in MWh)	29,081
<b>(6) Total fossil energy consumption (in MWh) (calculated as the sum of lines 1 to 5)</b>	<b>139,833</b>
<b>Share of fossil sources in total energy consumption (in %)</b>	<b>48.8%</b>
<b>(7) Consumption from nuclear sources (in MWh)</b>	<b>73,736</b>
<b>Share of consumption from nuclear sources in total energy consumption (%)</b>	<b>25.7%</b>
(8) Fuel consumption from renewable sources, including biomass (also including industrial and municipal waste of biological origin, biogas, renewable hydrogen, etc.) (in MWh)	752
(9) Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (in MWh)	72,504
10) Self-generated non-combustible renewable energy consumption (in MWh)	
<b>(11) Total renewable energy consumption (in MWh) (calculated as the sum of lines 8 to 10)</b>	<b>73,256</b>
<b>Share of renewable sources in total energy consumption (in %)</b>	<b>25.5%</b>
<b>TOTAL ENERGY CONSUMPTION (in MWh)</b>	<b>286,825</b>

## Energy performance diagnostics

In accordance with the European Directive on the energy performance of buildings (EPBD) and its transposition into national law in the countries where Covivio operates, the Group ensures that energy performance diagnostics are carried out on its buildings. As the methodologies used by each country are different, it is difficult to make comparisons between performance levels. Particular attention is paid to the change in the rating obtained following a renovation, in order to assess the gain in energy performance.

### Percentage of diagnostics carried out on the portfolio

Hotel real estate Europe: 84% by value/80.5% by surface area

### Breakdown of energy performance diagnostics across the portfolio (in value)

	A	B	C	D	Or from A to D	<D	Without Energy Performance Certificate (EPC)
Hotel real estate	1.8%	6.3%	26%	14.4%	48.5%	35.5%	16%

In accordance with the regulations in force on the date of the Energy Performance Certificate (EPC), some of the blank diagnoses are included in the rates presented above (0.6% for hotels).

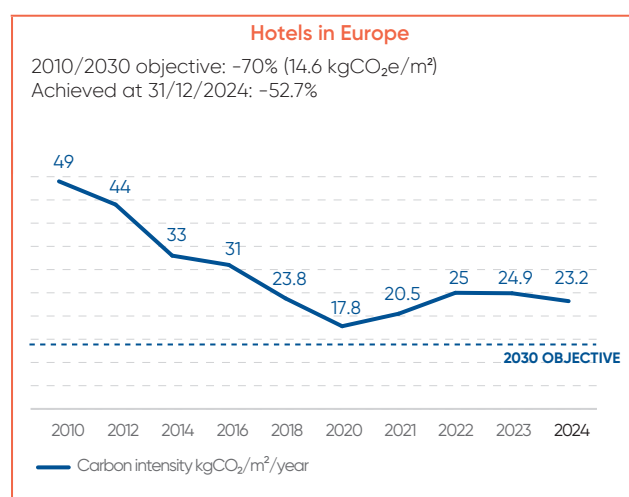
## Energy intensity based on net income (37)

Covivio Hotels generates almost all of its revenues in the real estate sector, which can be considered as a sector with a strong climate impact.

	2024	Reference number
Net Rental Income <sup>(1)</sup>	€262.7 million	Chap. 4.1.
Total energy consumption (MWh)	365,296	E1-6
Portfolio intensity (MWh/€)	0.00139054	

### 3.2.1.6 Gross GHG emissions of Scopes 1, 2, 3 and total GHG emissions (E1-6)

#### Change in the carbon intensity of the hotel portfolio



#### Change in energy consumption on a like-for-like scope for the portfolios (in kWhfe/m<sup>2</sup>)



(1) This figure refers to the sum of rents received in Group share value as of 31 December 2024 (see Chapter 4). In order to ensure the comparability of year-on-year data, revenues related to the operation of hotels and buildings coworking are not included. The rents collected on these assets are added to the total rent.

## Consolidated environmental data (Abs)

GHG - ABSOLUTE EMISSIONS	TOTAL PORTFOLIO	
	GRI	EPRA sBPR
	2023	2024
Surface area covered by the reporting scope (in m <sup>2</sup> ) – Scopes 1-2	-	564,151
Surface area covered by the reporting scope (in m <sup>2</sup> ) – Scopes 1-2-3	1,670,447	1,599,032
<b>Surface area covered by the reporting scope (in %) – Scopes 1-2</b>	<b>-</b>	<b>99%</b>
<b>Surface area covered by the reporting scope (en %) – Scopes 1-2-3</b>	<b>91%</b>	<b>96%</b>
Proportion of estimated data	-	2.8%
<b>GHG Protocol</b>		
Scope 1	GHG-Dir-Abs	-
Scope 2 Market based	GHG-Indir-Abs	-
Scope 3 Downstream leased assets MB	GHG-Indir-Abs	41,525
<b>Total emissions reporting (tCO<sub>2</sub>e)</b>	<b>41,525</b>	<b>37,150</b>
<b>Carbon intensity (kgCO<sub>2</sub>e/m<sup>2</sup>/year) Scopes 1-2 reporting</b>	<b>GHG-Int</b>	<b>-</b>
<b>Carbon intensity (in kgCO<sub>2</sub>e/m<sup>2</sup>/year) Scopes 1-2-3 reporting</b>	<b>GHG-Int</b>	<b>24.9</b>
Scopes 1-2 Location based	-	15,332
Scope 3 Downstream leased assets LB	52,953	32,194
Unadjusted MB emissions (Scopes 1-2-3)	39,906	35,394
<b>Reconciliation with financial statements and carbon trajectory</b>		
Total surface area	1,836,635	1,700,243
Scope 1-2 MB extrapolated	-	14,240
Scope 3 Downstream MB extrapolated	45,656	24,343
Scope 3 – Extrapolation of atypical assets/disposals, HP, etc.	-	548
Scope 3 Upstream/T&D energy extrapolated	-	2,396
<b>Total emissions operating integrated in the Group carbon trajectory (tCO<sub>2</sub>e)</b>	<b>45,656</b>	<b>41,527</b>
<b>Carbon intensity (kgCO<sub>2</sub>e/m<sup>2</sup>/year)</b>	<b>24.9</b>	<b>24.4</b>
<b>Emissions not included in the carbon trajectory</b>		
Scope 1 – Refrigerants in operating scope	-	836
Scope 3 – Emissions related to assets sold (extrapolation if no actual data) and business assets	-	10,288
Scope 3 – T&D	-	679
Scope 3 (See details below)	-	-

Covivio relies on the GHG Protocol methodology and aligns its reporting with a financial control approach (in which assets under operational control are included). The operating properties are under Covivio's financial control as long as they continue to be recognised in the balance sheet under IFRS 16 operating leases. In accordance with the GHG Protocol and market reporting practices, the Group distinguishes between the emissions of leased assets for which the lessee has effective energy management and assets over which Covivio has operational control (Scopes 1-2). Thus, the GHG emissions related to the tenants of these buildings are in Scope 3 in category 13 "downstream leased assets", representing 27,287 tCO<sub>2</sub>e in 2024. The calculation of biogenic emissions has not been done this year but is not significant for the Group.

## Consolidated environmental data (LfL)

CARBON - LFL EMISSIONS	TOTAL PORTFOLIO	
	2023	2024
Surface area covered by the reporting scope (in m <sup>2</sup> ) – Scopes 1-2	510,637	
Surface area covered by the reporting scope (in m <sup>2</sup> ) – Scopes 1-2-3	1,464,064	
<b>Surface area covered by the reporting scope (in %) – Scopes 1-2</b>	<b>92%</b>	
<b>Surface area covered by the reporting scope (in %) – Scopes 1-2-3</b>	<b>89%</b>	
<b>GHG Protocol</b>		
Scope 1	3,874	3,799
Scope 2 Market based	10,126	9,173
Scope 3 Downstream leased assets MB	22,583	20,215
<b>Total emissions reporting (tCO<sub>2</sub>e)</b>	<b>36,583</b>	<b>33,187</b>
<b>CARBON INTENSITY (kgCO<sub>2</sub>e/m<sup>2</sup>/year) Scopes 1-2 reporting</b>	<b>27.4</b>	<b>25.4</b>
<b>CARBON INTENSITY (kgCO<sub>2</sub>e/m<sup>2</sup>/year) Scopes 1-2-3 reporting</b>	<b>25.0</b>	<b>22.7</b>



## GHG emissions (E1-6 - RA-48)

Distribution by country	HISTORICAL BACKGROUND			TARGET STAGES AND YEARS	
	baseline year	2024	difference (%)	2030	2050
<b>SCOPE 1 EMISSIONS</b>					
<b>Scope 1 gross GHG emissions</b> (tCO <sub>2</sub> e)		<b>4,763</b>			
Percentage of Scope 1 GHG emissions resulting from regulated emission trading schemes (in %)		-			
<b>SCOPE 2 GHG EMISSIONS</b>					
<b>Scope 2 GHG emissions location-based</b> (tCO <sub>2</sub> e)		<b>15,557</b>			
<b>Scope 2 emissions market-based</b> (tCO <sub>2</sub> e)		<b>10,318</b>			
<b>MATERIAL SCOPE 3 GHG EMISSIONS</b>					
<b>Total indirect gross GHG emissions (Scope 3)</b> (tCO <sub>2</sub> e)					
1 Goods and services purchased [Optional sub-category: Cloud computing and data centre services]		83,844			
2 Capital goods		3,142			
3 Activities in the fuel and energy sectors (not included in Scopes 1 and 2)		3,076			
4 Upstream transport and distribution		-			
5 Waste generated during operations	Not calculated	5,527	N/A	-70% in intensity (operation Scopes 1-2-3.3 and 3.13)	Not defined
6 Business travel		6			
7 Employee commuting		1,165			
8 Upstream leased assets		-			
9 Routing downstream		-			
10 Processing of products sold		-			
11 Use of products sold		-			
12 End-of-life treatment of products sold		-			
13 Downstream leased assets location-based		49,748			
13 Downstream leased assets market-based		36,826			
14 Incentives		-			
15 Investments		1,881			
<b>SCOPE 3 GHG EMISSIONS (LOCATION-BASED)</b>		<b>148,388</b>			
<b>SCOPE 3 GHG EMISSIONS (MARKET-BASED)</b>		<b>135,467</b>			
<b>Total GHG emissions (location-based)</b> (tCO <sub>2</sub> e)		<b>168,709</b>			
<b>Total GHG emissions (market-based)</b> (tCO <sub>2</sub> e)		<b>150,547</b>			



## Scope 3 emissions and methodology applied

Category:	Sub-category	Details	Methodology	Source/Emission factors	Total tCO <sub>2</sub> e 2024	Included in the trajectory	If No, why
<b>1. Goods and services purchased</b>	Development activity	Total emissions related to our new construction projects	Emissions related to the construction/ renovation of buildings (based on our actual deliveries and data modelled with our CSTB consultant; they include the building's emissions amortised over a period of 50 years). It includes all items related to the construction/ renovation of buildings. Supplier-specific method	<b>Calculations made in collaboration with CSTB</b>	56,698	YES	
	Maintenance	Building maintenance - Operational control scope	Emissions related to building maintenance, calculated as follows: based on a ratio of €/m <sup>2</sup> of maintenance per year calculated on the basis of our directly managed offices (previously we used a generic factor), which can be translated into CO <sub>2</sub> emissions thanks to the ADEME ratio of 170 kgCO <sub>2</sub> /€ thousand. We have decided to exclude this item from our carbon targets because it does not represent a major lever for reducing carbon in our activities. <b>Expenditure method</b>	<b>Based on internal accounting data</b>	1,302	NO	Purely related to the daily maintenance of buildings, no leverage on this subject.
	Corporate Scope	Goods and services purchased for the operation of the business. The main categories are: goods, administrative services, catering, cloud computing services.	Based on the analysis of the total carbon footprint of the company carried out with the help of an external consultant as part of our C4C project (Covivio 4 Climate). <b>Average data and expenditure method</b>	<b>Based on internal accounting data</b>	53	NO	Given our activity, we consider that this category is not material.
	Hotel real estate in operation	Hotel real in operation, the main categories included are: F&B, supplies and linens, cleaning services, furniture, other business-related services.	Hotel Scope: based on actual carbon footprint analyses carried out on hotels in operation, then extrapolated to the entire portfolio of MF. Catering expenses are calculated on the basis of total catering expenses during the year, as shown in the income statement. <b>Average data and expenditure method</b>	<b>Based on internal accounting and operational data</b>	25,706	NO	See section below
	Water	Water consumption in our operating portfolio (water paid by Covivio and re-invoiced to the tenant)	Based on the water consumption that we control in our portfolio, we calculate the corresponding emissions. <b>Average data method</b>	<b>Based on data from water suppliers (invoices)</b>	84	NO	Non-material
<b>2. Capital goods</b>	Fixed assets	All the new depreciation for the year	On the basis of accounting data, we calculated the emissions related to capital goods for each relevant category: furniture, IT equipment, car fleet, construction equipment. <b>Expenditure method</b>	ADEME footprint database: monetary ratios used for each category (except for vehicles, with unit ratio). Based on internal accounting data	3,142	NO	Given our activity, we consider that this category is not material.
<b>3. Fuel and energy activities</b>	A. Emissions upstream of purchased fuels B. Emissions upstream of purchased electricity	Upstream emissions on development projects	Based on the LCA, these data represent the part relating to the LCA work site. <b>Supplier-specific method</b>	A LCA is carried out by the project's environmental consultant for each construction project. <b>Based on supplier data</b>	-	YES	
	A. Emissions upstream of purchased fuels B. Emissions upstream of purchased electricity	Upstream emissions connected to the use of our buildings under operational control	Based on the annual energy report, this covers the total energy consumption of our portfolio under direct management (multi-tenant offices, head office, hotels under management). <b>Average data method</b>	IEA Factors: total upstream data by country	2,396	YES	
	C. Transmission and distribution losses (T&D)	Portfolio under operational control	Based on the annual energy report, this covers the total energy consumption of our portfolio under direct management (multi-tenant offices, head office, hotels under management). <b>Average data method</b>	Electricity: Factors by country, life-cycle greenhouse gas emissions associated with transmission and distribution losses per kWh of electricity (gCO <sub>2</sub> e/kWh) DH&C: DEFRA	679	YES	
<b>4. Upstream transportation and distribution</b>			Taking into account the fact that upstream T&D is already included in the emission factors that we used, at least for the material categories.		-	NO	
<b>5. Waste generated in operations</b>		Portfolio under operational control	Based on waste reporting and an extrapolation for buildings for which we do not have the amount of waste. Supplier-specific method	ADEME footprint database for non-recyclable and recyclable waste	5,527	NO	

Category:	Sub-category	Details	Methodology	Source/Emission factors	Total tCO <sub>2</sub> e 2024	Included in the trajectory	If No, why
<b>6. Business travel</b>	Business travel	All modes of transport	Based on an analysis of the company's carbon footprint, using real travel data from travel agencies or from accounts. <b>Average data method</b>	Declaration made either by our travel agency or by direct calculation based on ADEME factors.	6	NO	Non-material according to our number of employees
<b>7. Employee travel</b>	Group employees daily commute		Based on the analysis of the company's carbon footprint following a mobility study carried out on the scope of Covivio. And an average emission factor for the hotel real estate in operation. <b>Average data method</b>	ADEME	1,158	NO	
<b>8. Upstream leased assets</b>		Not applicable: No upstream leased assets			-		
<b>9. Downstream transport and distribution</b>		Not applicable: No downstream transport and distribution			-		
<b>10. Transformation of sold products</b>		Not applicable: No transformation of products sold			-		
<b>11. Use of products sold</b>	Asset disposal		Emissions from the direct use phase connected to assets developed or renovated by Covivio and which are not amortised on the date of disposal (assumption of 50 years for new buildings and 25 years for renovations). Emissions are calculated according to location, based on the assumption of decarbonisation of the electricity mix.	The data is based on the actual reports we have of our assets, including assumptions about the decarbonisation of the energy mix in the future. CRRM: decarbonisation of the electricity mix. ADEME footprint database and equivalent: 2023 emission factors, refrigerants	-	NO	
<b>12. End-of-life treatment of products sold</b>		Not applicable: No end of life, assumption that all our buildings will be refurbished and accounted for in the other categories of the scope field of application as development projects.			-		
<b>13. Downstream leased assets</b>	Total energy consumption of the portfolio (excluding Scopes 1, 2, 3 and 1-2)		Emissions related to the energy consumption of our non-operational control assets. All information relating to the energy report of each portfolio is available in our sustainability report. This includes the scopes covered by actual data. Extrapolations are carried out on the surfaces for which we have no information.	<i>Market-based approach</i>	24,891	YES	
	Total consumption of assets not included in the reporting				10,288	NO	
	Refrigerants		Extrapolation based on assets for which we have an actual report		1,647	NO	
<b>14. Incentives</b>		Not applicable: No deductibles			-		
<b>15. Investments</b>	Issues related to assets we hold through joint ventures		This category represents emissions connected with assets that we hold through joint ventures without operational control (20% stake). These emissions are based on actual energy data and calculated in accordance with our reporting protocol.	Market-based approach, same calculation as for category 13 - DLA	1,881	NO	

Scope 3 data is mainly collected from the value chain. The material categories (1, 3, 13) are based on activity data obtained from suppliers or tenants. They are then recalculated according to the methodology indicated using emission factors such as those of the AIB or ADEME.

## Breakdown of emissions by country (Scopes 1-2-3 Operation)

Distribution by country	Total emissions Scopes 1-2-3 Operation (upstream included)
Germany	10,507
France	10,009
Spain	5,110
UK	5,014
Belgium	3,594
Hungary	2,668
Czech Republic	2,234
Italy	1,273
Netherlands	487
Poland	289
Portugal	202
Ireland	139
<b>TOTAL (TCO2E)</b>	<b>41,527</b>

### Focus on the hotel operating business

Previously not included in Covivio's carbon footprint and following the ex-AccorInvest hotel reorganisation operation (link Press release), Covivio calculated the carbon footprint of this activity. This also led to reclassifying emissions related to the energy consumption of these assets as Scope 1 and 2 emissions (vs Scope 3 previously). In order to guarantee continuity in the information published, Covivio continues to differentiate between its Scopes 1 and 2 emissions (historical scope) and its Scopes 1 and 2 emissions according to this new categorisation.

The operating activity impacts the following Scope 3 items:

Scope 3 (tCO <sub>2</sub> e)	Calculation
7. Commuting	1,165
1. Purchased goods and services (F&B, Laundry, Cleaning)	25,706
5. Waste generated in operations	5,527

The item related to catering is the main source of emissions (excluding energy in Scopes 1 and 2). The Green Key labelling process thus enables more data to be collected on operations and will enable operational objectives to be set, notably covering this item of emissions, beginning by obtaining more accurate data on food purchases (whose emissions are currently estimated using a monetary ratio).

The vast majority of these calculations were made on the basis of financial data (purchases) and factors from the ADEME Footprint Database.

Covivio is not directly subject to regulated emission trading systems in the course of its activities.

## GHG emissions intensity on a net revenue basis (39)

	2024	Reference number
<b>Net Rental Income</b>	€262.7 million	Chap. 4.1.
<b>Total emissions (tCO<sub>2</sub>e)</b>	150,547	E1-6
<b>Portfolio intensity (tCO<sub>2</sub>e/€)</b>	0.000573	

(1) This figure refers to the sum of rents received in Group share value as of December 31, 2024 (see Chapter 4). In order to ensure the comparability of data from one year to the next, revenues related to the operation of hotels and co-working buildings are not included. The rents collected on these assets are added to the total rent.

### 3.2.1.7 GHG emissions removals and mitigation projects financed through carbon credits (E1-7)

To date, Covivio does not finance mitigation or removals projects through carbon credits, apart from a few occasional tree planting projects (not material) as part of its corporate activities (communication and finance). Covivio is examining this topic as part of its strategic monitoring and with a view to fixing net zero targets beyond 2030 and by 2050 at the latest.

### 3.2.1.8 Internal carbon pricing (E1-8)

Covivio has explored the possibility of introducing an internal carbon pricing system, but has not considered this a priority compared to other levers of its carbon trajectory, and given that the carbon aspect is already an integral part of the decision-making process, particularly in investment committees (governance body for all investment projects (acquisition or development) over €5 million).

### 3.2.1.9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities (E1-9)

Covivio details the main financial risks related to climate change, which are quantified in particular through the MSCI Climate Value at risk study. The main types of risks and opportunities impacting the financial statements are summarised here:

	Affected financial statement item	Brief description	Risk estimation/ quantification	Explanations
<b>Physical risks</b>	Value of assets	Physical damage to assets Liquidity risk	MSCI	
<b>Transition risks</b>	Value of assets	Risk of depreciation, especially in relation to regulations concerning the energy efficiency of buildings	MSCI	Does not take into account the Capex that will be invested to bring the assets back on track
<b>Transition risks</b>	Capex	Risk of "failed" assets for which the Capex to be invested would be too high	Capex budget calculated and controlled, action plan per asset	
<b>Transition risks</b>	Revenues	Increase in energy-related expenses and loss of the attractiveness of the worst-performing buildings on the market		
<b>Physical risks</b>	Capex/Revenues	Interruption of operations or construction sites due to extreme weather events	Delivery delays, fall in hotel revenues	
<b>Opportunity - Market</b>	Revenues		14.7% alignment with the mitigation target and 31.9% by only retaining real estate activities (7.7)	
<b>Opportunity - Market</b>	Capex		20.4% alignment with the mitigation target and 84% with the adaptation target	
<b>Opportunity - Market</b>	Value		Easier access to financing (€4.1 billion aligned with the principles of the GB framework)	



## 3.2.2 Pollution (ESRS E2)

The ESRS E2 standard covers the presentation of information on air, water and soil pollution and substances of concern. This involves presenting the impacts (material, positive and negative, actual or potential) of the company on pollution and its actions to prevent, control, reduce and, if possible, eliminate them.

Risks related to air, water and soil pollution are risks inherent to Covivio's business, *i.e.* risks identified and characterised before any control system is implemented. These pollution risks are present during the construction or renovation phases, then during the building's operating phase. They are strictly governed by the regulations of the European countries where the Group operates, and by close monitoring by the dedicated teams at Covivio.

### 3.2.2.1 Management of impacts, risks and opportunities related to pollution (E2.IRO-1)

#### Identification of current and potential impacts, risks and opportunities related to pollution

The dual materiality analysis did not show this ESRS to be material with regard to the Group's activities, including the issues related to its value chain. However, Covivio has implemented various policies and actions on the subject to prevent issues related to soil, air and water pollution and to prevent the use of hazardous substances in its activities. They are described below in response to requests from stakeholders on the subject, but are not subject to the CSRD reporting obligation.

#### ESRS E2 – POLLUTION OF AIR, WATER AND SOIL

<b>Description and key words</b>	Environmental pollution/Remediation obligation Health and environmental risks, Occupant well-being Volatile organic compound (VOC) labelling
<b>Main impacts</b>	Air pollution causes 48,000 premature deaths per year in France with a health cost estimated at €100 billion per year In the sector, the impact is high on well-being and safety Potential impact on the environment during renovations Positive impact: soil remediation as part of development operations
<b>Positioning in the value chain</b>	Direct and downstream operations
<b>Main risks</b>	Limited risk of environmental pollution (water in particular) on hotels or renovation sites Financial risk: costs of precautionary measures to avoid infiltration, any clean-up and fines in the event of pollution. Risk of poor indoor air quality. The main sources of pollution are human activities (catering), construction and decoration materials (carpets, paints, varnishes, glue, etc.).
<b>Materiality</b>	Non-material

#### ESRS E2 – USE OF HAZARDOUS SUBSTANCES

<b>Description and key words</b>	Chemicals and phytosanitary products
<b>Main impacts</b>	Covivio Hotels' planted or semi-planted areas are limited. Nevertheless, when spaces require maintenance, the use of phytosanitary products is very limited.
<b>Positioning in the value chain</b>	Direct and downstream operations
<b>Main risks</b>	Reputational and legal risk coupled with a health risk concerning the use of phytosanitary products
<b>Main opportunities</b>	Creation of ecological continuity in respect of nature
<b>Materiality</b>	Non-material

### 3.2.2.2 Pollution policies (E2-1)

With regard to risks related to different types of pollution, the Environment Department applies a rigorous policy in compliance with local regulations. This involves monitoring:

- environmental diagnostics (Energy Performance Certificate (EPC), lead, asbestos, risk assessment, soil pollution);
- Installations Classified for the Protection of the Environment (ICPE);
- security commissions for hotels;
- environmental performance certifications for assets (BREEAM In-Use, Green Key, etc.).

These approaches go beyond regulations, with a strong focus on the safety of property and people and the resilience of buildings. This involves managing any risk that could make Covivio unable to deal with a claim, an accident or a health risk, involving the Company's liability.

The impacts and risks related to pollution are detected and assessed through audits or diagnostics, often made mandatory by regulations, and carried out during an acquisition or lease.

#### 3.2.2.2.1 Mitigation of negative impacts related to air, water and soil pollution

As has already been mentioned, the double materiality analysis showed that pollution is not a material issue for Covivio. Nevertheless, the Group strives to reduce and control the risks related to pollution:

- of air, with a greater focus since the health crisis of 2020 on carbon monoxide pollution and fine particles emitted in buildings in operation or under construction;
- of water: during the construction or renovation period, then during the years of operation of the site;
- soil and soil gases, over the same period, with regard to the consequences that materials or waste could have which could be hazardous to the environment or people.

The issue of air quality in buildings is addressed in ESRS S4 (section 3.3.4.5), in view of the fact that it is a matter of the safety and well-being of the occupants.

#### Pollution of soil

The management initiatives set up procedures concerning polluted sites and soil are based on the following principles: preventing future pollution, making safe any polluted sites discovered, identifying, monitoring and controlling the impacts, treating and rehabilitating the site for a specific use and then sustaining that use, keeping a record, involving all stakeholders.

The acquisition and management of buildings requires a number of diagnoses to be carried out, some of which may be mandatory depending on the date of construction of the building: asbestos, presence of parasites depending on the municipality (termites, etc.), risk and pollution status (public access buildings), identifying natural, mining and technological risks (risk of flooding, ground subsidence, Seveso risk, etc.) to which the asset may be exposed, etc. Covivio's Environment Department is responsible for ensuring proper compliance with

the regulations on Installations Classified for the Protection of the Environment (ICPE). In addition, certain risks may be the subject of additional investigations (soil pollution, etc.) or periodic monitoring (such as asbestos). Covivio uses dedicated environmental safety teams at each of its sites to ensure that regulatory diagnostics are performed and monitored. They are involved from the analysis of acquisitions, during the management period and until the creation of sales files (data-room).

Global certifications such as HQE or BREEAM offer the Group a framework that goes beyond regulations both in terms of air pollution (CO<sub>2</sub> emissions, NO<sub>2</sub>, refrigerants, etc.) and water pollution (type of single or separate outlet, pre-treatment/filtration before discharge, etc.).

#### Water pollution

Covivio has identified two main sources of risk of water pollution in its activities. Construction sites can present a risk with run-off water that can carry oils and hydrocarbons. If the site's wastewater is not discharged into the municipal sewerage system, a legally compliant sanitation system must be set up and managed by a specialised company. The low-nuisance construction site charters provided to all stakeholders outline these measures and other good practices for preventing water pollution, as well as the relevant regulations, and in particular the fact that it is strictly prohibited to discharge oils, lubricants and detergents into the municipal sewerage system. Finally, it describes the procedures that the site's environmental manager must put in place to manage accidental spills into water or soil: anti-pollution kit, alert measures and disposal to an approved treatment centre of soil or water which has been contaminated by accidentally spilled products. Containers with sufficient retention capacity are also provided to collect hazardous liquid waste from the site, such as paint, solvents and wood treatment products.

#### 3.2.2.2.2 Substitution, minimisation and gradual elimination of substances of concern

Covivio's low-nuisance construction site charter governs the use of hazardous products on construction sites. Products must be classified and labelled according to their properties indicated in the safety data sheet, in accordance with:

- either the EEC classification system (Directive 67/548, 6<sup>th</sup> amendment);
- or the system in force in France (decrees of 10 October 1983 and amendments and decree of 21 February 1990 as amended).

Except in exceptional cases, duly justified and approved by the project manager, it is prohibited to use products labelled with one of the following classifications:

- R20 to R29, R31 to R33, R40, R45 to 49 of phases R of the EEC;
- Xn (harmful), T (toxic), and T + (very toxic) in French regulations.

Less harmful products ('Xi, irritants') are tolerated provided that all precautions are taken when using them and that they do not give rise to subsequent emissions that could cause discomfort to the occupants.





### Use of phytosanitary products

The other potential source of pollution affects the operating portfolio, with the potential use of phytosanitary products to manage green spaces. The two biodiversity charters (design and management) set out Covivio's policy of exclusively using products that comply with regulations. The design of the green space must include this objective of the non-use of phytosanitary products, in relation to both the design and the management of the site. Prophylactic measures can therefore be put in place to prevent the occurrence of illnesses and to detect health problems at an early stage. This will include:

- diversifying the plants used and favouring plant associations to reduce pest pressure;
- thoroughly cleaning the tools used;
- implementing methods to monitor pest populations to assess potential risks and enable appropriate and effective action.

If, despite everything, pest control measures are necessary, biological control methods must be used. Several techniques exist:

- biological control by conservation: use of auxiliary substances to promote their spontaneous colonization;
- release of auxiliary products and installation of insect hotels to predate pests;
- biotechnical control using traps (sex pheromones, food traps, etc.).

#### 3.2.2.2.3 Avoiding incidents and emergency situations, controlling and limiting their impact on people and the environment

During the construction or renovation of buildings, Covivio has a low-nuisance construction site charter, which enables site workers to engage in subjects such as risk prevention, soil and air pollution or waste management.

Pollution issues are systematically included in all projects covered by this charter, and are categorised into two areas: air pollution and protection of the natural environment.

Covivio's low-nuisance construction site charters include the following provisions:

#### • Air pollution:

Air pollution is restricted by using adapted equipment. For example, cutting (saws, etc.) and sanding equipment are fitted with vacuum cleaners to prevent the dispersal of dust. Low-particle-emission materials (such as dust-free cement) are also used. In addition, the dispersal of equipment-related dust is minimised by cleaning the equipment when it leaves dusty areas. Dustbins are also covered to prevent the dispersal of powdery waste (powders, dust, fine particles). In addition, dust emissions from construction machinery are limited by various techniques: by gravelling the roads laid out on the construction site or by moistening the soil during dry periods (unless a prefectural order restricting the use of drinking water is in force). Finally, equipment that may emit toxic substances, such as exhaust fumes, is designed to expel stale air to the outside and keep healthy air inside.

### • Pollution and protection of natural environments:

In order to protect natural environments and limit pollution as much as possible, companies working on Covivio sites are subject to various principles set out in the charter. Any discharge of polluting products into the natural environment is strictly prohibited. Any discharge of untreated liquid effluents is strictly prohibited.

Covivio applies strict rules. Hydrocarbons and oils must be collected in a retention tank. They must also be biodegradable in order to reduce the risk of soil and groundwater pollution. Rainwater must also be collected to limit the amount of contaminated water runoff on site. Furthermore, clear water is separated from contaminated water to limit the volume of water to be treated. In addition, workers receive training on how to handle polluting products and the actions to be taken in the event of accidental spillage. Spill containment and clean-up equipment is therefore provided on construction sites.

The land must also be planted before the end of the project to limit the impact on biodiversity.

#### 3.2.2.3 Information on the absence of a policy (ESRS 2)

The environmental certifications included in Covivio's policy include the pollution regulations in each country and, like them, they are gradually becoming stricter. Given that this subject is not considered material after the double materiality analysis, no further actions are required under the policy applied in this area.

#### 3.2.2.4 Actions, action plans, processes (E2-2)

##### 3.2.2.4.1 Actions and resources related to pollution

Covivio uses dedicated environmental safety teams at each of its sites to ensure that regulatory diagnostics are performed and monitored. They are involved from the analysis of acquisitions, during the management period and until the creation of sales files (data-room). In France, for example, the Environment Department (4 FTE), which is part of Covivio's French Technical Department, carefully examines all environmental issues that may affect the asset's value or liquidity: asbestos, soil pollution, energy performance, exposure to natural or technological risks, classified facilities, etc. An analysis of the available documentation is performed during the due diligence phase in order to obtain the necessary guarantees during acquisitions or to answer buyers' questions during disposals. Environmental risks are assessed upon review of this documentation, supplemented if necessary by new investigations. Their short or long-term impacts are estimated in order to enable an assessment of the costs of any measures that may be decided to limit the impact of these risks.

#### Tools for appraisals

Covivio has used Provexi's services and platform for approximately fifteen years to monitor risks associated with asbestos, lead, natural hazards, mining and technology, etc. Provexi technicians enter data based on the diagnostics and audits performed during acquisitions and regularly updated, onto a platform which is accessible to Covivio employees (Environment Department, Technical Department, Assets and Property Managers, etc.) or to suppliers requiring information in this area (to guarantee the health of their employees and third parties (tenants, visitors, neighbours, etc.). Green, orange and red pictograms indicate whether the result of a given audit or diagnostic is fully or partially compliant or requires a more substantial action.

### 3.2.2.4.2 Commitment by the value chain against pollution

The low-nuisance construction site charter allows site workers to engage in subjects such as risk prevention, soil and air pollution and waste management.

#### The common thread, the example of L'Atelier

Each contractor involved in the renovation of L'Atelier had to comply with the site charter specific to the project. The main objectives of the construction site charter are set out below:

- ensure that the wood used on site (pallets and other) and in the construction is FSC or PEFC certified;
- meet waste reduction targets for at least five types of waste: achieve 75% energy or material recovery from non-hazardous site waste and 50% material recovery;
- monitor the site's energy and water consumption, as well as the movements of materials and waste;
- implement and observe responsible construction practices.

#### Management of VOC absorption

Covivio's low-nuisance construction site charter enables action to be taken upstream in the value chain to limit pollution. This includes instructions on limiting the absorption of Volatile Organic Compounds (VOCs):

- storage of absorbent materials: a suitable area is set aside for storing and protecting absorbent materials, including carpets, acoustic insulation panels, fabric wall coverings, insulating materials, padding and upholstery;
- installation sequencing: wet materials that emit VOCs, such as adhesives, wood preservatives and primers, coatings, glazes, paints and joint pastes are applied and left to harden for the required time, before applying absorbent materials (false ceiling tiles, plasterboard partitions, insulation or fibre floor coverings);
- drying time: hard primers requiring adhesive installation are applied and allowed to dry for at least 24 hours, before installing absorbent materials;
- ventilation: there is a waiting period after installing VOC-emitting materials in order to ventilate the spaces concerned. This prevents absorbent materials from absorbing these pollutants and subsequently releasing them into the indoor air;
- the painting phases are combined with the ventilation of the rooms, in order to quickly eliminate pollutants and odours. Manufacturers' recommendations are followed.

### 3.2.2.4.3 On-site action plans

#### What compliance with the European "green" taxonomy?

Covivio is subject to DNSH Pollution (Do No Significant Harm) in the context of several activities (renovation, new construction). Compliance is mainly based on regulatory alignment (REACH <sup>(1)</sup>) and this is reiterated in its contractual documents with its service providers. The use of products with low VOC emissions is also required (3.2.6).

### 3.2.2.5 Targets related to pollution (E2-3)

#### Effectiveness of policies and actions through targets

At present, Covivio has not set itself any quantified targets on the subject of pollution over and above the regulations. However, Covivio closely monitors pollution risks using the Provexi tool: 85% of the sites are already covered by diagnostics and monitoring via this platform.

Covivio has participated in several experiments, for example on indoor air quality, in order more effectively to identify the levers for improvement. Covivio was a pioneer by participating in OfficeR, a pan-European study carried out in conjunction with the CSTB, one of the first studies conducted on the subject, around ten years ago. In addition, Covivio organised the "air quality challenge" call for projects in 2019, in partnership with EDF and the business incubator Impulse Partners, focusing on air quality in commercial buildings. Since then, Covivio has used the winner, Octopus Lab, to monitor air quality in most of its directly managed office buildings in France.

Covivio aims to monitor and integrate measures to control pollution (air and water) in its different activities (construction, office operations and hotels):

- water: proof must be provided that the domestic water system is free of lead and that the regulatory threshold of 10 µg/L is being respected. If the threshold is exceeded, the company must take corrective action to reduce the lead content in the water (or renovate the domestic water systems);
- air quality: Covivio's contracts require the use of low-emission materials (labelling emissions as class A+ volatile pollutants) for all its projects, which is particularly beneficial for site personnel and subsequently for users. The class of filter must correspond to an indoor air quality in accordance with the new normative reference EN 16798;
- soil pollution: the buildings do not house any polluting industrial activity but are nevertheless monitored to ensure that the level of soil pollution is in line with regulations.

(1) Registration, Evaluation, Authorization and restriction of CHemicals.

### 3.2.2.6 CSRD data requirement

<b>Pollution metrics (E2-4)</b>	At present, Covivio has not set up a system for monitoring pollution metrics. Nevertheless, measurements are performed on development projects, in accordance with regulations but also in the context of voluntary certifications (HQE, BREEAM, etc.). These analyses concern air and water quality and are carried out again in the operational phase (ESRS S4). These measures have not been consolidated by the Group at this stage.
<b>Financial effects on IROs (E2-6)</b>	To date, Covivio has not provided a description of quantitative information on the financial consequences of the material risks and opportunities arising from the impacts of pollution. This type of analysis has not been examined to date. Covivio has not set aside any provisions for any legal proceedings concerning a risk of pollution.

## 3.2.3 Water and marine resources (ESRS E3)

The ESRS E3 standard covers the presentation of information on water and marine resources. The challenge is to explain how the company uses water (surface or groundwater) and how it is impacted through its products, services, discharges, etc. The purpose is to present Covivio's adaptation strategy for sustainable water use. Finally, the company's approach to analysing and managing the risks of flooding, water stress, etc. will be explained.

### 3.2.3.1 Impacts, Risks and Opportunities of water and marine resources for Covivio (E3 – IRO – 1)

2023 saw record temperatures in France and many other countries. A historic drought was also recorded, with multiple fires and a significant impact on biodiversity. The government presented its action plan on 26 January 2023. Objective: "Reduce the volume of water abstracted from our underground aquifers by just over 10% by the end of the five-year presidential term", said the Minister for Ecological Transition. Among the avenues being explored are recycling wastewater and stepping up the fight against leaks.

In 2024, France had heavy rains and serious flooding, particularly in the south. Other European countries were not spared, with more than 200 deaths in Spain, for example. The effects of the ongoing climate upheaval are not linear. Nevertheless, year after year, water is becoming a crucial issue even for countries that until now, have not had a drinking water supply problem.

Covivio's water consumption is mainly related to the operation of buildings. It therefore constitutes an operating expense and is borne by the lessee. Water consumption on construction sites is included in the topics covered by the low-nuisance construction site charters. The main uses are detailed below and were key in defining the impacts, risks and opportunities related to this issue. The dual materiality analysis highlighted the fact that the issues related to water and marine resources were not material for Covivio, unlike the aspects related to consumption, supply and presence in areas at risk of water stress. Water contributes to the level of comfort and status of a hotel through a range of services: showers, laundry, swimming pool, etc. It is therefore an important issue for Covivio Hotels, as it is for the hotel sector as a whole, with a high level of consumption and certain uses that may be subject to restrictions in the event of drought.

Aspects relating to water pollution are dealt with in ESRS E2 and do not stand out as material with regard to Covivio's activities.

### Main uses of water in Covivio's activities

1 / OPERATION			2 / CONSTRUCTION SITE
All portfolios	Specific corporate	Specific hotels	
<ul style="list-style-type: none"> <li>Domestic hot water/ cold water</li> <li>Watering green spaces</li> <li>Network leaks</li> </ul>	<ul style="list-style-type: none"> <li>Consumption of services (catering, coffee, etc.)</li> <li>Chilled water for cooling buildings</li> </ul>	<ul style="list-style-type: none"> <li>Spa, swimming pools</li> <li>Catering</li> <li>Chilled water for cooling buildings</li> </ul>	<ul style="list-style-type: none"> <li>Construction site and vehicle cleaning</li> <li>Water used (cement on site)</li> <li>Site living quarters</li> </ul>

### Summarizing table of IROs related to water and marine resources

ESRS E3 – WATER (CONSUMPTION, SUPPLY, WATER STRESS)	
<b>Description and key words</b>	Trends in water supply risks Water stress Raising awareness
<b>Main impacts</b>	The use of water is omnipresent in hotels (showers, kitchens, swimming pools, etc.) and increasingly so as establishments become more upscale
<b>Positioning in the value chain</b>	Upstream, direct and downstream operations

<b>Main risks</b>	Physical risk related to water (flooding, rising water levels) that can cause damage and operational disruptions or construction delays Business continuity risk in the event of restrictive measures Image risk: hotels may be targeted by the media and associations during periods of restriction Financial risk: 10% increase in the price of water on average in France in 2023
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<b>Materiality</b>	Material
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### ESRS E3 - MARINE RESOURCES

<b>Description and key words</b>	Marine pollution and hazardous discharges into freshwater Wastewater treatment Groundwater abstraction
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<b>Main impacts</b>	In France, 31% of groundwater bodies are in poor condition due to pollution Groundwater abstraction is not relevant for Covivio The impacts are related to catering: supply of fish, shellfish
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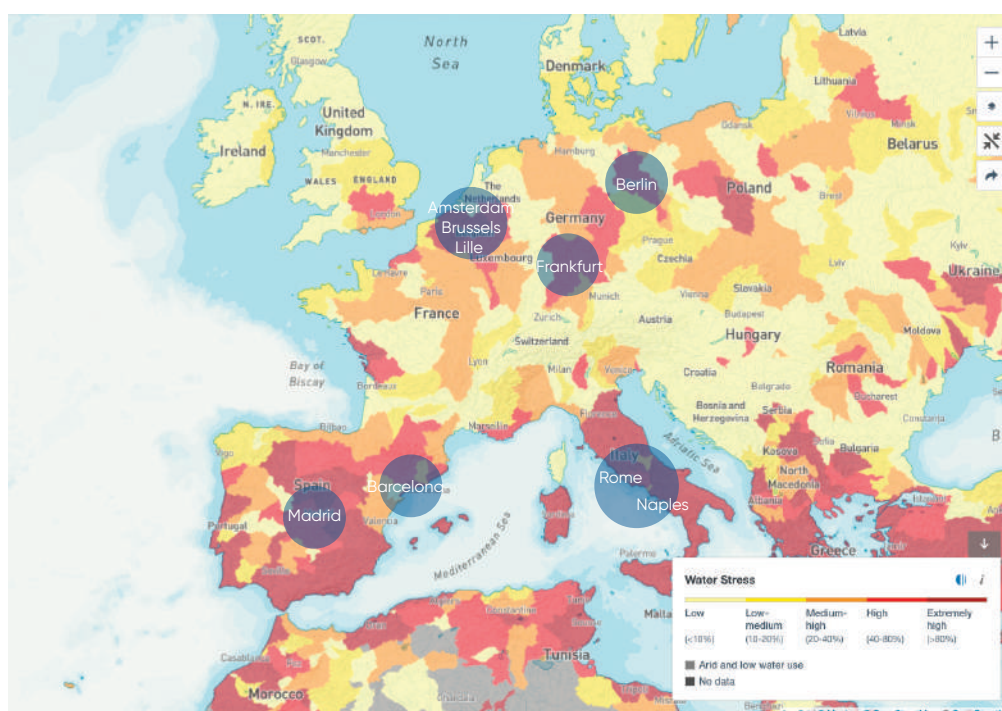
<b>Main risks</b>	Reputational risk (fairly limited) Financial risk: increase in costs with the implementation of responsible sourcing
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<b>Materiality</b>	Non-material
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### Risk mapping: WRI Aqueduct mapping

To further identify water-related risks, Covivio conducts an annual analysis of its portfolio with regard to the risk of water stress. This analysis is based on the Aqueduct Water Risk Atlas tool developed by the World Resource Institute (WRI). Since 2024, the MSCI Climate Value at Risk analysis also includes the level of water stress across our portfolio as well as extreme rainfall. However, this risk of water stress is not financialised in the MSCI study.

According to the WRI Aqueduct mapping, respectively 28% and 16.5% of the surface water scope are located in a region with a high or very high risk of water stress (SASB IF-RE140a), i.e. 39.5% of water consumption.



Main areas with high levels of water stress in the Covivio portfolio

The assessment of Covivio's water use and dependence was carried out using a public reference tool, the Aqueduct Water Risk Atlas, which enabled a map to be made of Covivio's portfolio in areas of water stress. According to this tool, an area of high water stress is one in which the total amount of water abstracted reaches a high percentage (i.e., 40-80%) or extremely high (i.e., more than 80%).

It should be noted that Covivio Hotels does not draw directly from groundwater, as its assets benefit from public water distribution networks.

### 3.2.3.2 Water resources management policies (E3-1)

Water is set to become a major issue in Europe as climate change takes hold. Covivio therefore set up a system in 2008 for reporting water consumption by building, which enables it to monitor the targets set in the context of the operation of its portfolio.

The CSR risk map produced by Covivio highlighted the challenge of controlling operating expenditure as material, particularly in terms of the implications for tenant satisfaction and the attractiveness of its hotels. Covivio Hotels carries out major renovations on its properties in coordination with the tenants. Environmental certification (HQE, BREEAM, etc.) for 100% of development projects enables high levels of performance to be achieved, particularly in terms of energy and water consumption.

The issue of water is becoming crucial for hotels, as they are both highly dependent on it as well as heavy consumers. The average fluctuates depending on the category of the hotels. The more stars a hotel has, the higher the average consumption, because of the services offered to customers. Consumption depends on a number of criteria such as the number of rooms, the existence of swimming pools, catering, green spaces and laundry facilities. Measures have been adopted in each of these areas to encourage more economical use of water.

Customers are increasingly aware of the environmental impacts of water consumption. Thus, according to a study by Booking<sup>(1)</sup> from 2022, 27% of respondents prefer to do without the daily room cleaning service in order to minimise water consumption.

The water used in the operational portfolio and during development operations comes exclusively from the mains water supply.

The issue of water is also present upstream of the supply chain of hotels and particularly their restaurants ("Food and Beverage" activity).

The nature of Covivio's activities means that it does not have to carry out any water treatment, either for use or for discharge. This is because the water used by Covivio is taken from the mains systems and is discharged to the sewerage systems. Water treatment is therefore a non-material issue for Covivio. However, the Group is implementing measures to prevent the pollution of the water used on its construction sites (ESRS E2).

The policies detailed in this section apply to the different stages of the building's life cycle (development, renovation and operation).

They are deployed and monitored by the Technical Department of Covivio Hotels for assets in operation and by the Development Department for buildings under construction or renovation. By deploying these policies, Covivio Hotels is in line with the objective defined in the water efficiency plan launched in France in April 2023, which aims to reduce water abstractions by 10% by 2030.

These policies apply to all assets, whether they are located in an area of water stress area or not, with more vigilance being paid when more water-consuming facilities are present (spa, swimming pool), especially as the assets concerned located in a water stress area may be subject to restrictions. A growing number of hotel customers are aware of the challenges related to the preservation of water resources.

#### 3.2.3.2.1 Limiting water consumption in the portfolio

Covivio has been monitoring the water consumption of its buildings since the environmental mapping of its portfolio of buildings was carried out in 2010. The history of these consumptions and the significant drop observed illustrate the effectiveness of the measures taken in the buildings to reduce water consumption. Since 2018, the level of consumption has reached a low point.

#### 3.2.3.2.2 Innovation to limit water consumption on construction sites and buildings developed by Covivio

Covivio is integrating water-saving technologies in the context of its developments and to align with the Taxonomy. The buildings (constructions, renovations) are equipped with systems that aim to reduce water consumption: foamers on the taps of the washbasins and sinks, low-flow showers, toilets with 3L/6L tanks, rainwater harvesting for watering green spaces, etc.

In its low-nuisance construction site charters, Covivio lists the technical tools that limit water consumption during the construction phase:

- programmable automatic shut-off unit for the construction site water supply. Shutdown outside of construction hours, to limit any leaks;
- rainwater harvesting and reuse;
- use of cleaning equipment that limits consumption (cleaning paint rollers);
- skip washing area with water recycling, etc.

#### 3.2.3.2.3 Engage with hotel operators

In 2024, Covivio Hotels launched a Green Key certification process for its hotel operating properties. The benchmark for this label takes water into account, which is a material in the hotel industry and contributes to controlling a hotel's operating costs. Even more so if the hotel has a restaurant, swimming pool or spa-type facilities. In any case, the cleaning of bed linen, towels and tablecloths, as well as the showers, account for high levels of consumption. In this context, the GHR 5<sup>(2)</sup>, UMIH<sup>(3)</sup>, CNG<sup>(4)</sup> and the National Syndicate of Tourism Residences and Apart-Hotels have signed a charter of commitments "water efficiency plan" to combat water stress and droughts due to climate change.

Covivio Hotels' water management policy is consistent with this by deploying concrete actions (3.2.3.3) to reduce the water consumption of its hotels.

(1) <https://news.booking.com/climate-community-and-choice-bookingcom-reveals-the-trends-shaping-sustainable-travel-in-2022>

(2) GHR: Groupement des Hôtelleries et Restauration de France.

(3) UMIH: Union des Métiers de l'Industrie de l'Hôtellerie.

(4) GNC: National Group of Hotel Chains.



### 3.2.3.2.4 Involve suppliers and raise customer awareness

Covivio's Responsible Purchasing Charter requires the supplier to make a commitment regarding its environmental impact, which includes reducing water consumption. Covivio's supplier also undertakes "to limit the environmental impacts of its activity throughout its supply chain, by favouring local, bio-based, recycled and recyclable materials and also by taking into account, as far as possible, the packaging and mode of transport of products by offering environmentally friendly products and services, in particular eco-labelled products and services". These commitments enable Covivio to indirectly reduce water pollution in its activities by its suppliers using environmentally friendly products.

In addition, Covivio's low-nuisance construction site charters also require partner companies to commit to reducing their water consumption.

Lastly, raising awareness among hotel customers is a strong lever for reducing water consumption. Covivio Hotels is increasing the informative signage for its customers in its directly operated hotels. The challenge is to encourage more responsible water consumption (encourage showers, reduce the frequency of towel washing and room cleaning).

### Multi-year water targets

Scope	Objectives	Deadline	2024 completions	Progress
Hotel real estate Europe	≤ 2 m <sup>3</sup> /m <sup>2</sup> /year	Permanent	1.42 m <sup>3</sup> in 2024	
			1.41 m <sup>3</sup> /m <sup>2</sup> in 2023	
			-38% compared to 2008	

Water discharges are not a significant issue for Covivio. It should be noted that new construction and renovations can have a positive impact in this area in two ways:

- development of green terraces: the soil retains rainwater, particularly during storms, which reduces the risk of sewerage systems becoming overloaded;
- the construction of retention tanks that collect rainwater and then discharge it into the sewerage system using a "drip" system.

### 3.2.3.3 Water action plan and objectives (E3-2)

A water-saving plan was launched in France in April 2023. It aims to reduce the use of this resource by 10% by 2030. Covivio Hotels includes this objective for the hotel buildings it manages directly, whether or not they are in water-stressed areas. For buildings under leases, i.e. leased to brands, the water consumption targets and monitoring are the responsibility of the tenant. Nevertheless, they are the subject of discussions between the lessee and the lessor at meetings: Partnership Committee, Environmental Committee, etc. They are subject to commitments by tenants.

The Group has set itself the objectives shown in the table below for its portfolio as a whole. Covivio has chosen not to use a reduction target for this indicator, in particular because of the low level reached by the hotels owned in Europe (around 1.5 m<sup>3</sup>/m<sup>2</sup>/year). The objectives are therefore to remain below the performance threshold of 2 m<sup>3</sup>/m<sup>2</sup>/year). Covivio's Sustainable Development Department collects and formats the water consumption reporting.

It should be noted that the growing presence of green spaces in buildings is leading to an increase in water consumption on sites where recovery cannot be implemented or is not sufficient.

There is no specific budget for the action plan to reduce water consumption, as the initiatives it covers are included in the costs of works (construction, renovations) or operating expenses.

### Hotel real estate action plan

**As of 31 December 2024, 90% of WiZiU hotels were Green Key certified or in the process of being approved.** In order to obtain the Green Key label, hotels must positively meet fourteen water management criteria. Green Key teams carry out site audits directly for the certification and then regularly to verify that hotels are remaining compliant. Covivio Hotels is rolling out a system to obtain the Green Key label for all of its sites by the end of 2025.

Hotels must therefore implement or reinforce seven measures to preserve the resource, based on monitoring and comparative analysis of consumption, as well as six measures concerning their equipment and one measure concerning watering.

### Water management criteria (Green Key Grid)

Resource conservation	Valves and equipment, watering
The hotel is compliant with the water distribution, collection and treatment regulations	At least 75% of taps have a flow rate of less than 8 L/minute
Use of a fat recovery system in professional kitchens	At least 75% of showers have a flow rate of less than 9 L/minute
Monthly monitoring of water consumption and an annual comparative assessment are carried out	At least 50% of the toilets are equipped with a flush of less than 6 L AND when the installations are replaced, the new toilets are systematically equipped with a 3/6 L double-flush or a flush less than 6 L
One meter per water source in the hotel (mains supply, spring, well, borehole)	If the hotel has urinals, they have pushbuttons, sensors, a water-saving system or operate without water.
Household cleaning products and swimming pool products are stored in conditions that are not harmful to the environment or health: containment system and secure premises	A procedure is in place to detect water leaks in all taps, pipes, toilets and, where applicable, swimming pools in the hotel
Newly acquired dishwashers and washing machines are water and energy efficient	Newly acquired tunnel and hood-type dishwashers use less than 3.5 L per load/basket
Each WC has a waste bin	If the hotel has urinals, they have pushbuttons, sensors, a water-saving system or operate without water.

- For further information: the Green Key site.

### 3.2.3.4 Water-related indicators (E3-4)

The average intensity presented here was calculated to quantify Covivio Hotels overall footprint in terms of water consumption.

Its scope includes hotels owned in Europe (under traditional leases and operating properties).

Overall consumption is calculated based on the tables presented in 3.2.3.4.1.

#### 3.2.3.4.1 Total water consumption across the portfolio

Covivio defines water consumption as the consumption which is billed and not by deducting discharges from water withdrawals (in line with what is defined by the CDP - Water). The water consumed in each building in this reporting scope comes from a single source and is mainly distributed to this source: the municipal water networks. Covivio does not abstract groundwater directly. An insignificant proportion of the water used is related to rainwater collection in the portfolio, while discharges can be of several kinds, although they remain marginal at Group level: water integrated into products (cement on construction sites), water returning to nature (watering), water leaks.

- **Hotels under a standard lease: the tenant has a subscription for the building with the water distribution company.**
- **Hotel operating properties: the operator holds a subscription for the building with the water distribution company (operational control perimeter).**

The water consumption figures given below are taken from the invoices, which are mostly based on estimates made by the suppliers, and are subject to adjustments (which can take from one to three years in some cases), and which can therefore result in significant changes.

Covivio Hotels water consumption remained stable in 2024 compared to 2023.



WATER - ABSOLUTE CONSUMPTION	GRI	EPRA best practices recommendations	HOTELS OPERATING PROPERTIES	HOTEL LEASE PROPERTIES	HOTELS EUROPE	
			2024	2024	2023	2024
Coverage of the reporting scope by surface area (m <sup>2</sup> )			559,898	994,142	1,625,193	1,554,041
Coverage of the reporting scope by surface area (%)			98%	91%	88%	94%
Scope coverage in number of buildings			52/54	188/225	280/308	240/279
Percentage of estimated data			2.4%	2.0%	-	2.1%
<b>Total water consumption (m<sup>3</sup>)</b>			<b>634,908</b>	<b>1,575,838</b>	<b>2,292,089</b>	<b>2,210,746</b>
<b>Water intensity (m<sup>3</sup>/m<sup>2</sup>/year)</b>			<b>1.13</b>	<b>1.59</b>	<b>1.41</b>	<b>1.42</b>
Total extrapolated water consumption (in m <sup>3</sup> )			649,123	1,725,032	2,590,295	2,362,474
Water consumption in high water stress areas			18,218	181,273	-	199,491
Water consumption in areas with very high water stress levels			121,759	294,239	-	415,999
<b>Reconciliation with financial statements</b>						
Residual consumption of vacant buildings (in kWhfe)			-	-	0	0
Consumption of atypical assets (in m <sup>3</sup> )			-	-	-	128,117
Prorated consumption of assets delivered, acquired or sold during the year (in m <sup>3</sup> )			-	-	-	272,487
<b>Total extrapolated energy consumption + consumption outside the reporting scope (in m<sup>3</sup>)</b>			<b>649,123</b>	<b>1,725,032</b>	<b>2,590,295</b>	<b>2,763,078</b>

The water intensity in relation to revenues is: 0.010518 m<sup>3</sup>/€.

Covivio does not directly carry out water recycling operations in the course of its activities and does not use large-scale storage equipment. However, the Group uses rainwater harvesting systems, mainly for watering green spaces or, more innovatively, as an alternative system for supplying water to the toilets in a building.

The proportion of stored, reused and recycled water is insignificant for Covivio and is not measured, even though rainwater harvesting systems may be installed on buildings.

### 3.2.3.4.2 Change in consumption on a like-for-like scope

WATER - LFL CONSUMPTION	OPERATIONAL CONTROL		TOTAL PORTFOLIO	
	2023	2024	2023	2024
Coverage of the reporting scope by surface area (in m <sup>2</sup> )	510,739		1,373,784	
Coverage of the reporting scope by surface area (in %)	89%		83%	
Scope coverage in number of buildings	-		-	
<b>Total water consumption (in m<sup>3</sup>)</b>	<b>597,522</b>	<b>576,365</b>	<b>1,949,408</b>	<b>1,954,777</b>
<b>WATER INTENSITY (in m<sup>3</sup>/m<sup>2</sup>/year)</b>	<b>1.17</b>	<b>1.13</b>	<b>1.42</b>	<b>1.42</b>
<b>Variation</b>	<b>-3.5%</b>		<b>0.3%</b>	

### 3.2.4 Biodiversity (ESRS E4)

The ESRS E4 standard covers the presentation of information relating to biodiversity. This involves presenting the impacts (material, positive and negative, actual or potential) of the company on biodiversity and its actions to prevent and mitigate them, and to promote its restoration.

The construction and real estate sectors play a key role in the erosion of biodiversity. They contribute to the phenomena of change in land use and soil sealing during the construction of buildings but also upstream of it through their significant consumption of raw materials to manufacture materials. Covivio, aware of the many links between climate and biodiversity issues, wanted to develop an integrated "Nature" strategy, in order to supplement existing climate objectives with new commitments relating to land use, the use of resources or rehabilitation, in order to address all of its impacts on living things. The formalisation of this strategy is the result of two years' work, including an in-depth diagnosis of biodiversity issues (risk, opportunity, impact and dependency assessment - ROID). This strategy, which was approved in 2024 by the Executive Committee and then the CSR Committee, and which covers the period to 2030, forms the basis of Covivio's commitment to carbon and biodiversity issues and demonstrates the Group's renewed commitment to the transition.

It emerged from the studies conducted and the workshops held in-house that it would be relevant and coherent to define a Nature strategy which combined climate and biodiversity strategies. These issues are in fact inseparable and require the adoption of a global vision that encompasses their interdependence. The strategy and action plan described in this ESRS are therefore directly linked to ESRSs E1, E3 and E5.

The monitoring and implementation of Covivio's Nature strategy relies on existing CSR governance bodies: the CSR Committee oversees the Nature strategy, and the Sustainable Development Department is responsible for its operational management, in coordination with the Group's different activities and countries. The Group's Sustainable Development Steering Committee, which regularly comprises the Chief Executive Officer (CEO), the Chief Operating Officer and the Sustainable Development Director, also helps to consolidate the link between Nature issues and the decision-making bodies. In addition, targets related to the implementation of this strategy have been included in the criteria for awarding bonuses to corporate officers (ESRS 2, section 3.1.2.2.4).

Covivio Hotels is fully committed to the deployment of Covivio's Nature strategy. As a subsidiary, it benefits from the expertise and support of the Group's Sustainable Development Department. It shares the policies and strategies and strives to achieve the Group's objectives by implementing actions specifically geared to its activities.

#### 3.2.4.1 Transition plan and consideration of biodiversity and ecosystems in strategy and business model (E4-1)

The loss of biodiversity is linked to five main pressures caused by human activities:

- change in the use of land, freshwater and the seas; examples: artificialisation due to urban sprawl, fragmentation due to the construction of linear infrastructures;
- overexploitation of resources; examples: overfishing, overexploitation of timber, plundering of rare plants and animals;
- climate change; examples: GHG emissions due to fuel combustion, deforestation;
- pollutant emissions; examples: fine particles, nitrogen compounds, chemical pollutants, dust;
- spread of invasive exotic species; examples: spread of Japanese knotweed through freight transport.

Covivio is aware that it operates in a sector that is highly dependent on and significantly impacts biodiversity, and is therefore convinced that it is essential for the Group to take nature issues into account, whether in terms of environmental responsibility or risk management. In 2019, Covivio launched a series of diagnostics with the aim of improving the understanding of the relationships between its business activity and climate change, water resources and biodiversity.

To supplement these initial elements, an in-depth study of the impacts, dependencies, risks on, and opportunities of Nature was carried out between 2021 and 2024. This study aims to define the resilience of Covivio's model with respect to biodiversity-related issues within the meaning of ESRS E4-1.13, covering all of the Group's activities. Covivio's Nature strategy was developed on this basis, integrating and supplementing its existing commitments and boosting the company's environmental ambition. This strategy mobilised numerous internal stakeholders and drew on feedback from external stakeholders (customers, investors, suppliers, design offices).

#### A sector at the heart of the ecological transition

Nature is the basis of all aspects of human life (water cycle, climate regulation, etc.) and is crucial for our economies, with more than 50% of global GDP directly dependent on natural resources. However, in recent decades, it has become increasingly damaged by human activity, and this alarming situation is reflected by a large number of indicators: in 2019, 75% of the Earth's surface had been significantly altered by human activity, more than 85% of wetlands had been lost and the number of wild animal populations fell by 69% between 1970 and 2018. The economic development methods that have dominated until now are no longer compatible with sustaining living ecosystems.

Although the loss of biodiversity is not a recent phenomenon, the subject is receiving renewed attention in the wake of the 15<sup>th</sup> United Nations Convention on Biological Diversity (COP15) in 2022, which led to the Kunming-Montreal Agreement (or Global Biodiversity Framework). The regulatory landscape and methodological frames of reference have been strengthening in recent years at the national level (National Biodiversity Strategy in France and Italy, Sustainable Development Strategy in Germany, etc.), European level (CSRD, Taxonomy, etc.) and international levels (TNFD<sup>(1)</sup>, SBTN<sup>(2)</sup>, etc.). Companies and investors are now increasingly required to include biodiversity issues in their strategies and to communicate transparently about them. The increased consideration of the relationships between economic actors and biodiversity is encouraging a shift in focus away from climate issues alone, towards a more holistic view of environmental impacts – or "nature" impacts – enabling

(1) The Taskforce on Nature-related Financial Disclosures.

(2) Science Based Targets Network

synergies to be developed and conflicts between different environmental issues to be avoided.

The construction and real estate sectors, particularly the hotel industry, are playing a key role in the loss of biodiversity. They contribute to the phenomena of land use change and soil sealing/artificialisation during the construction of buildings, but also upstream of construction through the high consumption of raw materials to produce building materials. The extractive (gravel, sand, etc.) and processing (clinker, etc.) stages of raw materials have a major impact on biodiversity (land use change, pollution, etc.) and the climate, thus making it a critical issue to consider the entire life cycle of the building. Beyond reducing their impact, the construction and real estate sectors, particularly the hotel industry, can also play a positive role by contributing to the transition of cities and regions, influencing lifestyles and ways of living and working.

### 3.2.4.1.1 Identify the impacts and dependencies of Covivio's activities across the whole value chain

In 2023, Covivio conducted an assessment of its main impacts on biodiversity and its dependencies on ecosystem services throughout its value chain, based in particular on GBS (Global Biodiversity Score) tools, ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure), as well as the WBCSD report <sup>(1)</sup> "Roadmap to Nature Positive, Foundations for the built

environment system". This initial assessment enabled the Company's main areas of impact to be identified and served as a basis for defining the Nature strategy.

#### Main impacts

Covivio's impacts can obviously be attributed to its core business. Nonetheless, it is essential to reduce them and therefore measuring them is of paramount importance.

Static impacts assess the portion of "ecological debt" which Covivio is responsible for. Ecological debt is the aggregate of past damage to biodiversity (prior to the year of study), the impacts of which are still visible today. Dynamic impacts assess the additional damage to biodiversity caused by a year of activity (the year of study).

- Static land impacts: 48 MSA.km<sup>2</sup> (half of Paris) <sup>(2)</sup>.
- Static water impacts: 11 MSA.km<sup>2</sup> (1/4 of Lac du Bourget).
- Dynamic land impacts: 2 MSA.km<sup>2</sup> (the size of the 6<sup>th</sup> arrondissement of Paris).

Each year, Covivio's activities contribute to a loss of biodiversity equivalent to the destruction of an area of abundant nature covering 2 km<sup>2</sup>.

Two-thirds of Covivio's impacts on biodiversity are related to the supply of construction materials.

#### Main impacts of Covivio on biodiversity, by scope and pressure <sup>(3)</sup>

IPBES pressures	GBS pressures	Scope 3 Upstream Supplier	Scope 2 GHG emissions Electricity supply	Scope 1 Group operations	Scope 3 Downstream Customers
<b>Use and change in use of ecosystems</b>	Land use and change of land use in river catchment areas, wetlands and on land Encroachment and fragmentation	High impact	Low impact	High impact	High impact
<b>Overexploitation of resources</b>	Water imbalance caused by water consumption (static pressure only)	Medium impact	Low impact	Low impact	Medium impact
<b>Climate change</b>	GHG emissions (dynamic pressure only)	High impact	Low impact	Low impact	High impact
	Ecotoxicity (dynamic pressure only)	High impact	Low impact	Low impact	Medium impact
<b>Pollution</b>	Atmospheric nitrogen deposition	Low impact	Low impact	Low impact	Low impact
	Freshwater eutrophication (static pressure only)	High impact	Low impact	Low impact	Low impact
<b>Invasive species</b>	Not taken into account			Not assessed	

<sup>(1)</sup> World Business Council for Sustainable Development

<sup>(2)</sup> The Mean Species Abundance (MSA) – is an indicator that reflects the average abundance of native terrestrial species (mammals, birds, amphibians, reptiles, invertebrates and vascular plants) in a territory, compared to their abundance in the original undisturbed ecosystems ([developpement-durable.gouv.fr](https://developpement-durable.gouv.fr)).

<sup>(3)</sup> The definition of direct pressures on biodiversity is detailed on the IPBES website.

The supply of raw materials (in particular aluminium, cement, steel and wood) for construction and renovation activities accounts for most (around 2/3) of Covivio's impacts. The main pressures associated with these activities are change in land use (extraction and processing sites), GHG emissions (energy consumption to extract and transform ores), ecotoxicity and eutrophication (water and soil pollution associated with mineral processing).

The energy consumption of tenants is the second largest impact item (around 25%), and, in addition, generates GHG emissions.

In comparison, the use and conversion of land associated with real estate development and management has a relatively low impact (around 10% of the impacts). This is mainly due to the footprint of existing buildings, especially the German residential portfolio, which is the Group's largest portfolio in surface area. The low impact of this item is also due to the fact that Covivio mainly operates in already urbanised areas and that the real estate development activity is not majority in the Group.

Two main lessons stand out from the results for Covivio Hotels, due to low portfolio turnover rate and the small number of new development operations in recent years:

- the energy and water consumption of tenants is the most material subject both upstream (due to the GHG emissions related to this consumption) and downstream;

- the static impacts of direct activities, connected to the existing portfolio, are relatively higher than for other activities because of the portfolio's surface area and a lower level of development in recent years, thus reducing the upstream impacts associated with construction.

#### Main trends

Covivio's activities depend heavily on the services provided by nature throughout its value chain.

Overall, Covivio's activities are dependent on several ecosystem services:

- the availability and quality of water throughout the value chain, as a resource necessary to extract and manufacture materials (cement, etc.) and for the correct operation of construction sites (preparation of mortar, etc.) and building operations;
- the production and availability of construction materials (sand, gravel, wood, etc.);
- climate regulation and protection against floods and storms, which are essential for the sustainability of assets and the safety of construction sites as well as for the extraction and processing sites of materials.

#### Covivio's main dependencies on biodiversity, by scope and by nature

	Upstream	Direct operations	Downstream
<b>Surface water</b>	High	High	High
<b>Groundwater</b>	Average	Average	Average
<b>Mass stabilisation and erosion control</b>	High	Average	Average
<b>Water quality</b>	Not assessed	High	High
<b>Fibers and other materials</b>	High	Not assessed	Not assessed
<b>Protection against floods and storms</b>	Average	High	High
<b>Climate regulation</b>	High	Average	Average

#### Methodology

The GBS (Global Biodiversity Score) tool, launched in 2020 by CDC Biodiversité <sup>(1)</sup>, uses the company's economic and physical data (surface areas, water and energy consumption, etc.) to assess how its activities, direct operations and supply chain contribute to different pressures on biodiversity. This contribution is expressed through a single metric, the Mean Species Abundance (MSA <sup>(2)</sup>) per km<sup>2</sup>, a measure of biodiversity loss (1 MSA.km<sup>2</sup> represents 1 km<sup>2</sup> of virgin biodiversity that has been destroyed). More information on the GBS method is available [here](#).

The ENCORE tool has enabled the identification of the ecosystem services which a given activity depends on in accordance with the global macro-sector average of its sector across the entire value chain. The results of the tool were then reviewed and supplemented with the WBCSD report Roadmap to Nature Positive, Foundations for the built environment system. More information on the ENCORE method is available [here](#).

This analysis was supplemented by the impacts related to greenhouse gas emissions and thus the Group's carbon footprint (ESRS E1).

(1) Created in 2008 by Caisse des Dépôts et Consignations, CDC Biodiversité is a subsidiary of the CDC Group. Its main mission is to reconcile biodiversity and economic development in the service of the general interest.

(2) The Mean Species Abundance (MSA) - is an indicator that reflects the average abundance of native terrestrial species (mammals, birds, amphibians, reptiles, invertebrates and vascular plants) in a territory, in relation to their abundance in the original undisturbed ecosystems. ([developpement-durable.gouv.fr](http://developpement-durable.gouv.fr))

### 3.2.4.1.2 Identify Nature risks in order to improve prevention, and identify opportunities in order to seize them more effectively

In order to prevent and manage climate and biodiversity risks, Covivio has carried out targeted analyses and detailed the risk factors that could significantly impact the company's financial and non-financial situation. In addition to the Group risk map, which is regularly updated under the supervision of the Risk, Compliance, Audit and Internal Control Department, and the CSR risk maps produced in 2019 (in connection with the implementation of the DPEF) and 2020 (CSR risks related to purchasing), an initial assessment of climate risks was carried out in 2020 on the Offices scope using the MSCI Climate Value-at-Rising solution. This study was then extended to the entire Group. Updated annually, it is supplemented by other typical analyses of biodiversity or water stress issues (WRI Aqueduct) as well as by the use of the PREDICT tool to analyse

the exposure of Covivio's portfolio to increased heat waves and flooding. An internal mapping has also enabled the exposure of the assets to rising sea levels to be assessed. In 2024, a Nature risk study, incorporating all this work, was conducted, providing input for structuring the Nature strategy. This study was supplemented by the creation of a map of all the Group's sites in relation to areas of interest in terms of biodiversity (3.2.4.5).

These studies were conducted with the participation of the Department of Sustainable Development, country contributors and intermediaries, and were validated by the Sustainable Development Steering Committee. The main Nature risks and opportunities identified as part of these studies are presented below.

#### Priority risks

##### Risks of political transition, in connection with changes in regulatory contexts:

Obligations to install solar panels or green roofs on buildings, regulations aimed at limiting urban development and protecting green spaces, introduction of a carbon tax combined with an increase in the price of materials, or traceability and responsibility obligations in relation to raw materials such as the European regulation on Deforestation-free products (EUDR)

##### Physical and systemic risks related to climate phenomena or ecosystem collapse

Rising water levels, rising temperatures and changes in soil stability (shrinkage/swelling of clays, etc.); scarcity of water resources that could lead to shortages or conflicts of use; disruption of supply chains and increase in the price of raw materials (scarcity of wood resources due to fires or pests, shortages of concrete due to water stress, etc.)

#### Main opportunities

##### Business opportunities

Emergence of new markets for renovation (including energy efficiency renovation), deconstruction and sustainable building design

##### Financing opportunities

In connection with the development of these new markets, support for ecological catering or the transformation of the sector

##### Opportunities in terms of resource use and ecosystem protection

Notably in terms of the use of green spaces to contribute to ecological continuity

#### Methodology used

The assessment of biodiversity risks and opportunities was based on the TNFD recommendations and was broken down into the following stages:

- identification of the main risks and opportunities by category (regulatory, market, etc.);
- assessment of the probability of the risks and opportunities occurring based on two scenarios taken from the ADEME publication "Transition(s) 2050" (see appendix), documentary work and expert opinions;
- assessment of the potential impacts of each risk or Covivio's ability to seize each opportunity, via a workshop involving representatives of the operational teams in each country.

The table in the appendix describes the results and the scenarios used in more detail.

#### Supply disruptions in the value chain represent a major risk

Extreme weather risks (heat waves or forest fires) or chronic risks (continuous increase in temperatures, depletion of water resources, etc.) as well as changes in legislation and geopolitical issues are likely to create disruptions in supply in the value chains on which Covivio depends. For example, timber production, which is directly dependent on the health of ecosystems and climate stability, is likely to be caught between a sharp increase in demand and a decline in productivity, creating strong pressure on price, as well as supply disruptions<sup>(1)</sup>. In 2021, the forest fires in British Columbia in Canada had a very significant impact on the increase in the price of wood in the United States over the same period. The production of concrete, closely linked to the availability of water resources, is also likely to be undermined by the scarcity of the resource. It is estimated that in 2050, 75% of the water catchment areas necessary for the production of concrete will be located in areas of water stress<sup>(2)</sup> that the demand for sand, the second most consumed resource in the world after water, could grow by 45% by 2060, creating considerable pressure on this finite resource<sup>(3)</sup>.

(1) [https://www.researchgate.net/figure/Projected-wood-supply-gap-selected-tropical-countries-Chart-World-Bank-PROFOR-CIF\\_fig1\\_342437408](https://www.researchgate.net/figure/Projected-wood-supply-gap-selected-tropical-countries-Chart-World-Bank-PROFOR-CIF_fig1_342437408)

(2) Impacts of booming concrete production on water resources worldwide, A Miller et al., Nature Sustainability, 2018.

(3) NewScientist - We are running out of sand and global demand could soar 45% by 2060.

To mitigate these risks, Covivio works with construction companies which have a diversified panel of suppliers, which enables them to adapt to the fluctuating availability of many critical materials for its projects, such as wood or sand. Nevertheless, the Group remains vulnerable to supply disruptions and increases in the prices of materials which are key to

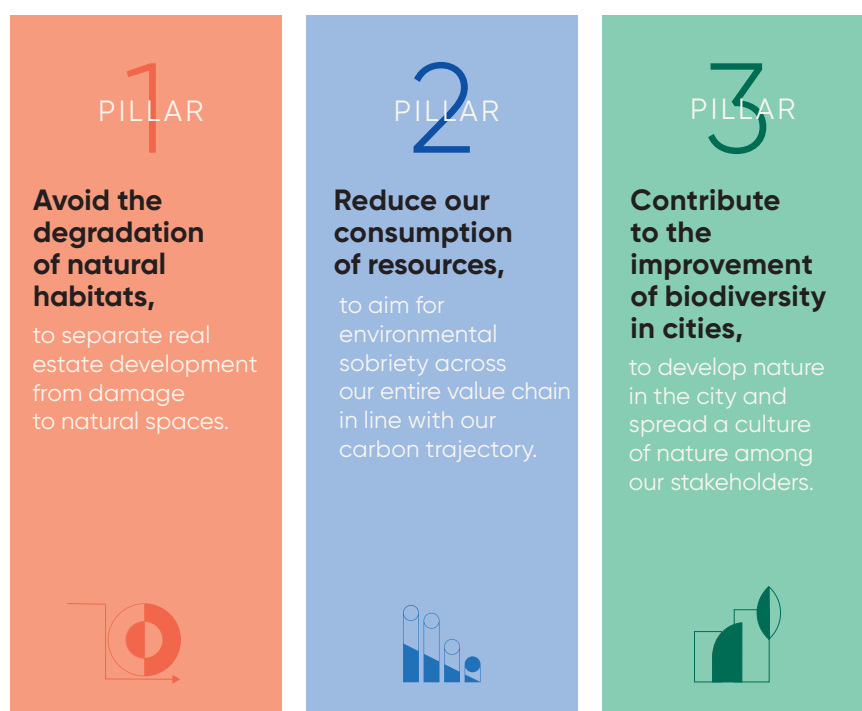
improving the environmental quality of buildings, such as wood. Consequently, improving expertise in the traceability of materials, reducing the use of new materials and improving knowledge of suppliers are key aspects of the Group's new Nature strategy (Pillar 1, priority 3).

### 3.2.4.1.3 Summarising table of biodiversity-related IROs (SBM-3)

ESRS E4 - POLICIES AND ACTIONS RELATED TO BIODIVERSITY	
<b>Description and key words</b>	Biodiversity conservation strategy Avoid/Reduce/Offset Artificialisation and land use/100% Zero Net artificialisation Dependencies and ecosystem services Biodiversity charters and policies, management of green spaces, invasive plants
<b>Main impacts</b>	The impacts of Covivio Hotels are not negligible, GBS study carried out in 2022: <ul style="list-style-type: none"> <li>• Land use is the pressure to which Covivio contributes the most, mainly through the purchase of building materials, but also through its existing portfolio;</li> <li>• Hydrological disruptions and ecotoxicity related to the supply and use of raw materials for renovations as well as customers' electricity consumption;</li> <li>• GHG emissions for the same reasons.</li> </ul> Positive impact: the use of green spaces in the portfolio to contribute to ecological continuity or to restore biodiversity in city centres (based on ecological diagnostics), mainly on large sites. Key figures: 96% of land is artificialised in France (7% in 1992), this figure is 25% in the Ile de France region. The national target is to reduce artificialised areas by half by 2031 (compared to 2021)
<b>Positioning in the value chain</b>	Upstream, direct and downstream operations
<b>Main risks</b>	The financial risks are difficult to quantify and can be localised at project level: preventive measures, compensation, which may go as far as the risk of planning permission being refused. Significant reputational risk
<b>Materiality</b>	Material

### 3.2.4.2 Policies related to biodiversity and ecosystems (E4-2)

Covivio has devised a Nature strategy based on the analyses carried out, structured around three pillars: (1) preventing damage to natural habitats, (2) reducing resource consumption, (3) helping to improve biodiversity in cities. Each pillar has been developed around objectives and an operational action plan, which will be finalised by the beginning of 2025. This strategy renews the Group's environmental commitment, by integrating and supplementing existing objectives (climate, etc.) with new areas of work (artificialisation, traceability, land restoration, etc.).



This strategy was developed on the basis of the “Avoid, Reduce and Transform” framework, inspired by the “Avoid, Reduce, Regenerate, Restore and Transform” promoted by the work of the Science-Based Target Network. This approach is based firstly on mitigating the impacts of Covivio’s activity (avoidance and reduction), and secondly on helping to restore biodiversity within its scope of business activity.

The strategy covers all of the Group’s activities by adapting to the specificities of each one (in particular by differentiating between the development and operation of buildings). Although this strategy mainly targets environmental issues, it is also intended to have societal impacts, particularly on the well-being of the occupants and the communities affected. A Nature Steering Committee has been set up in order to successfully implement the action plan, and is included in the governance of sustainable development issues presented in the ESR 2.

#### Covivio’s strengths and weaknesses in coping with risks and seizing opportunities

Following the work undertaken (3.2.4.1), Covivio examined its capacity to deal with the risks identified in this analysis, as well as to seize opportunities.

Covivio has several strengths for dealing with identified Nature risks and seizing opportunities. The Group has a good understanding of its risk exposure due to the completion of several specific studies; a development model in dense urban environments that helps to combat urban sprawl and promote building renovation; and a set of pilot projects on which to draw, on key topics such as the use of biosourced materials or the installation of green roofs.

Covivio has also identified the following areas for improvement in order to more effectively take biodiversity risks and opportunities into account:

- structuring purchasing traceability mechanisms;
- developing know-how in order to work on existing assets (e.g. for the creation of natural spaces, or the installation of certain energy and water saving devices).

All of these factors were included in the creation of the Nature strategy.

The commitments presented below respond to the IROs identified (3.2.4.1), are rolled out operationally (3.2.4.3) and are connected to quantifiable objectives (3.2.4.4).



### 3.2.4.2.1 Avoiding damage to natural habitats

Covivio's impacts on biodiversity are linked to the artificialisation of land (the primary source of damage to the living world), due to its development operations, but also and above all further up its value chain, in connection with the extraction and processing of raw materials. Limiting artificialisation, strengthening traceability and defining demanding standards for key materials are major areas of work for Covivio, which is working to separate its real estate development model from any additional damage to natural habitats.

#### Pillar 1 commitments

- The direct impact of assets on natural areas is well known: systematising the monitoring of indicators to determine the impact of our assets in terms of artificialisation and proximity to sensitive areas, i.e. protected areas or areas considered as key for biodiversity (Key Biodiversity Areas or KBA). These are essential territories for the conservation of biodiversity on a national or global scale, home to rare ecosystems or endemic or threatened species that can play a vital role in biodiversity conservation.
- The Group's real estate development is not associated with damage to natural areas: commit to ZAN (Zero Net Artificialisation) and reinforce the associated real estate offers.
- Covivio is committed to improving the traceability of key materials: developing better knowledge of the environmental impact of the materials used to favour the most sustainable of them.

### 3.2.4.2.2 Reduce resource consumption

The objective of this pillar is to reduce the consumption of natural resources connected to Covivio's activities. This objective is based on two commitment levers: reducing the use of new raw materials by developing the circular economy and offering buildings that are sober in terms of water and energy use. In addition to reducing the Group's environmental impacts, these commitments strengthen the Group's resilience with regard to Nature risks and improve customer satisfaction by reducing their consumption.

#### Pillar 2 commitments

- The Group's buildings are exemplary because they enable tenants to reduce their water and energy consumption: ensuring a high level of water and energy performance across all assets.
- Covivio's dependency on new raw materials is reduced: favouring the use of recycled materials upstream, and selective deconstruction and recovery downstream.

### 3.2.4.2.3 Contributing to the development of nature in the city

Apart from limiting the impact of buildings on the environment, Covivio wants to play its full part in regenerating nature in the city, by preserving the soil, developing ways of fostering biodiversity in its developments and creating a "biodiversity culture" among its teams and customers. The main focus of the third and final pillar of Covivio's Nature strategy is to aim for a positive impact on biodiversity in the majority of projects and to raise awareness among teams and residents.

#### Pillar 3 commitments

- A positive impact on biodiversity in 100% of development operations: monitor and maximise biodiversity gains on projects.
- Foster a culture of nature within teams: raising awareness among key functions and developing in-house biodiversity expertise.
- Involve customers and stakeholders in biodiversity issues: raising awareness of environmental issues and making them a key component of Covivio's brand image.

### 3.2.4.3 Actions and resources related to biodiversity and ecosystems (E4-3)

#### 3.2.4.3.1 Main actions implemented in connection with the Nature strategy

##### 1. Actions related to Pillar 1 - Avoiding damage to natural habitats

The actions taken are aimed at meeting the pillar's key objectives (detailed in 3.2.4.4), namely:

- contribute to Zero Net Artificialization by 2030;
- 30% of capital expenditure related to energy renovation and densification operations by 2030;
- development of a traceability system for high-risk materials (at national or regional level) by 2030.

#### Limiting land use and environmental impacts

Artificialisation, in the context of a project or a territory, is defined as 'the lasting alteration of all or part of the ecological functions of an area of land, in particular its biological, hydrological and climatic functions, as well as its agronomic potential, through its occupation or use' (art. 192 – Climate and Resilience Act). However, its definition may differ according to local, national or European regulations, particularly in the definition of what is considered to be already artificialised, thereby influencing the interpretation of 'Zero Net Artificialisation'. The CBS tool that Covivio uses to, in particular, control the artificialisation and de-artificialisation associated with its projects (see below), considers a given surface to be artificialised if it is sealed. Covivio is therefore committed to combating artificialisation and urban sprawl, mainly by favouring refurbishments, but also by densification. The Group is thus committed to the building of the city on the city and against urban sprawl.

#### The proximity of Covivio's assets to protected areas and the risks associated with the measures to protect these areas

In 2024, Covivio analysed the proximity of its 1,641 sites to protected areas (including 100% of its hotel portfolio), following on from similar analyses conducted in 2015, 2017 and 2020 over more limited scopes. The study revealed that a significant portion of the Group's assets are located near key biodiversity areas: 42% of sites are located less than one kilometre from a protected area, 25% less than 500 metres and five sites are located directly inside protected areas. The results of this study are detailed at the Covivio Hotels level in section 3.2.4.5.

This close proximity gives Covivio a special responsibility for preserving biodiversity, particularly for the sites closest to or inside protected areas (compliance with regulations, development of action plans to reduce and minimise the potential impacts of using the site, training of Covivio teams and raising awareness among occupants, etc.). These sites are also an opportunity to strengthen links with local players committed to nature conservation and to anchor the Group's commitment to biodiversity at the local level. Furthermore, apart from mitigating negative impacts, it is important to consider the means Covivio has at its disposal to contribute to maintaining or even restoring natural areas and green, blue and black corridors.



### CBS, a tool for measuring the impact of projects on biodiversity

Covivio has, in partnership with the ARP Astrance design office, decided to develop its own indicator, which can integrate green spaces and their social values into operational sites. Covivio's CBS (Biotope Coefficient per Area) is based on the scientific literature and on the CBS methodology used by industry players, in particular as developed by the city of Berlin. The indicator describes the ratio between eco-socio-developable areas (non-soil sealed areas favourable to biodiversity and biophilia) and the total surface area of the site. Thus, each type of surface is given a weighting according to its interest for biodiversity, the weighting scale ranging from 0 to 1.2 (0 representing soil sealed surfaces and 1.2 surfaces with a strong ecological interest). Covivio's CBS includes eight different types of surface as well as 17 bonus features (awareness panels, nesting boxes, flowery meadows, etc.). These bonuses are aligned with Covivio's challenges, making it possible to integrate the notions of biophilic value, ecosystem services, biodiversity and the ecological management of green spaces. The CBS value enables the sites in their current state to be compared with development scenarios, or to compare data for the same site for different years.

#### Forest resources

Covivio is committed to using forest products (wood, paper) from sustainably managed forests, with PEFC or FSC labels, in its operations, both in the development and operating phases. The Group reminds its stakeholders of this commitment in the context of low-nuisance construction site charters or in the orders placed with its suppliers within its corporate scope.

## 2. Actions related to Pillar 2 – Reduce resource consumption

The actions taken are aimed at meeting the pillar's key objectives (detailed in 3.2.4.4), namely:

- -40% of GHG emissions (ESRS E1);
- 100% of assets with environmental certifications (ESRS Sectoral challenges);
- -25% energy consumption (baseline 2019) (ESRS E1);
- doubling the production of solar energy in the Group's portfolio (ESRS E1);
- using recycled materials: [30]% steel, [30]% aluminium and [30]% cement per m<sup>2</sup> built [to be specified after full diagnosis] (ESRS E5).

As this pillar is highly interconnected with the other ESRS, the related actions are detailed in the different sections.

## 3. Actions related to Pillar 3 – Contribution to improving biodiversity in cities

The actions taken are aimed at meeting the pillar's key objectives (detailed in 3.2.4.4), namely:

- 90% of new constructions with a positive impact on biodiversity (i.e. improved CBS);
- net gain in biodiversity on the 20 largest sites in the portfolio under direct management.

So as to ensure that biodiversity-related issues are taken into account, two internal charters were drafted in 2014 and updated in 2019:

- a charter concerning the creation of green spaces, intended for the development or the complete renovation of green spaces and facilitating obtaining a label such as BiodiverCity®;
- a charter concerning the management of green spaces, covering operations in use and facilitating the obtaining of a label such as BiodiverCity Life®, Eve® or EcoJardin.

### Raising tenants' awareness of biodiversity issues

The Group leverages a strong partnership-based approach with its customers to work towards environmental transition. All awareness-raising actions are described in ESRS S4, section 3.3.4.3.c. including the implementation of green clauses in leases, the organisation of sustainable development committees, awareness-raising as part of an energy efficiency approach, etc. Covivio now wishes to raise awareness of nature issues by using these existing channels (Objective 21 of the strategy).

Covivio joined the Act4nature International initiative<sup>(1)</sup> in 2021. This is an initiative launched in 2018 by the French association of Enterprises for the Environment, with the aim of mobilising companies on the issue of their direct and indirect impacts, their dependencies and their options for acting in the interest of nature. Covivio signed up to the ten joint commitments<sup>(2)</sup> on this occasion and set itself individual objectives as part of its strategy, which were recognised by the international committee of Act4nature (a network of companies, NGOs and scientific organisations) as SMART (specific, measurable, additional, realistic and time-specific). As such, Covivio publicised its individual commitments at the launch of the European Business & Nature Summit in November 2021. These supplement the objectives that were previously included in the Group's CSR action plan and make provision for the use of new indicators: measuring the impact of developments on biodiversity by the end of 2022, a net gain in biodiversity across 100% of operations by the end of 2025, etc.

### 3.2.4.3.2 Resources allocated to biodiversity and ecosystem protection

It is difficult to understand the resources allocated to biodiversity because the topic is so closely linked to other issues. However, it is possible to identify different types of resources directly related to the protection of biodiversity:

- **Human resources:** internally with the Sustainable Development Department and operational staff working on implementing the action plan. The development of the Nature strategy involved around thirty internal participants at the European level.

(1) <https://www.act4nature.com/wp-content/uploads/2021/11/COVIVIO-VA.pdf>

(2) <https://www.act4nature.com/wp-content/uploads/2024/03/A4-act4nature-international-VA-03-24.pdf>

- **Financial resources allocated to support:** study and consultancy costs are obviously required at a number of levels. Firstly, at the level of a development project within the context of applying the principles of the Biodiversity Charter with an ecologist, for example, or in the context of a specific mission such as with Arp Astrance to develop the CBS indicator for Covivio. Secondly, in the longer term, as was the case with the Nature strategy, when Covivio appointed the firm Utopies because of its expertise in biodiversity and change management.
- **Financial resources related to planning:** taking biodiversity into account on site (operational or development assets) requires special planning for outdoor spaces, in accordance with the recommendations of the charter and, where necessary, the project ecologist.

#### The common thread, the example of L'Atelier

The budget for external improvements and the environment represented approximately 3% of the works' budget. The landscape plan incorporates Covivio's approach to designing green spaces and the BiodiverCity method used on this site, which houses the Group's new European headquarters. This work resulted in the creation of 1,000 m<sup>2</sup> of outdoor spaces, almost half of which were planted with greenery.

#### 3.2.4.3 Offsetting mechanisms

Covivio does not directly implement *ex situ* offsetting measures as part of its projects (e.g. financing of reforestation projects by a third party to offset the artificialisation caused by a project). Calculations regarding artificialisation are made on a site-by-site basis. It is therefore accepted, in accordance with the legislation, that any development resulting in the artificialisation of a surface area must be offset by the creation of green spaces of an equivalent or greater surface area. It should be noted that the majority of the Group's development projects are in urban areas.

#### 3.2.4.4 Targets related to biodiversity and ecosystems (E4-4)

##### Objectives of the Nature strategy

For each pillar of the strategy, Covivio has set objectives to cover the impacts, risks and opportunities identified. Intermediate stages have been identified for the deployment of each action, postponing the launch of certain objectives, either because the current state of knowledge was not considered sufficient or priority was given to achieving another objective of the plan first.

This action plan also includes climate objectives (ESRS E1), water-related objectives (ESRS E3) and objectives relating to waste management and the circular economy (ESRS E5). Covivio has to involve its entire value chain to achieve this, beginning with its employees (ESRS S1), who were involved in drawing up this plan, as well as its suppliers (ESRS S2), the community, especially in relation to the ecosystem services provided by nature (ESRS S3), and its customers (ESRS S4). This holistic approach is required to ensure the consistency of this strategy and address the related IROs.

#### Pillar 1 - Avoiding damage to natural habitats

Objective	Launch	Deadline	Situation at 31/12/2024	Scope	Link with IROs
<b>Knowing the direct impact of assets on natural spaces</b>					
# 1 Monitoring of artificialisation indicators (including the CBS*) for 100% of the pipeline (as of 31/12/N)	Launched	End of 2025	75% of projects delivered in the last two years	Development (commercial and residential)	<b>Impacts:</b> change in land use <b>Risks:</b> obligation to respect regulations on the limitation of urban planning, the artificialisation of soils and the protection of natural spaces (e.g. CBD target of 30% protected areas, green and blue corridors, etc.)
# 2 100% of the assets covered by the referencing of assets located close to natural areas	Launched	End of 2024	100%	Operations - Group	
<b>Dissociating real estate development from damage to natural areas</b>					
# 3 0% of net artificialisation (balance for the committed pipeline, cumulative from 01/01/2024 on the pipeline to be retained)	2026-2028	Annual assessment	Not calculated	Development (commercial and residential)	<b>Impacts:</b> land use change, climate change <b>Risks:</b> obligation to respect regulations on the limitation of urban planning, the artificialisation of soils and the protection of natural spaces (e.g. Objective of 30% protected areas within the meaning of the Convention on Biological Diversity (CBD), green and blue corridors, etc.) <b>Opportunity:</b> new renovation and deconstruction market, in line with zero net artificialisation policies.
# 4 Favour refurbishment rather than demolition/reconstruction: at least 30% of development Capex linked to refurbishment or height raising	2026-2028	End-2028 and permanent thereafter	33% renovation (/ Development Capex, excluding residential)	Group	

Objective	Launch	Deadline	Situation at 31/12/2024	Scope	Link with IROs
<b>Implement a traceability standard for key materials</b>					
# 5 Structure a traceability process for the main construction materials (concrete, glass, steel, etc.) used in operations	2024-2026	End of 2026	To be launched	Development (commercial and residential)	<b>Impacts:</b> change in land use, climate change, overexploitation of water resources and pollution. <b>Risks:</b> <ul style="list-style-type: none"> <li>obligation to demonstrate that the purchase of raw materials is compatible with the zero deforestation regulation for goods imported into Europe (wood and rubber are already covered, the regulation could be extended to mining products)</li> <li>disruption of supply chains and material shortages due to extreme events (e.g. wood shortages due to forest fires, pests, concrete shortages due to water stress).</li> </ul>
# 6 Strengthen the Responsible Purchasing policy by integrating and deploying new criteria for key materials (recycled, low-carbon, origin, etc.)	2026-2028	End of 2028	To be launched	Group (with a particular focus on development activities)	

## Pillar 2 - Reduce resource consumption

Objective	Launch	Deadline	Situation at 31/12/2024	Scope	Link with IROs
<b>Owning exemplary buildings enabling customers to reduce their water and energy consumption</b>					
# 7 - 40% carbon intensity per m <sup>2</sup> held (Scope 1, 2 and 3, reference year 2010)	Launched	End-2030	-28% at the end of 2024	Group	<b>Impact:</b> climate change <b>Risk:</b> tightening of regulations concerning the GHG emissions of companies. <b>Opportunity:</b> financial grants for the installation of solar panels or green roofs.
# 8 100% of the core portfolio and 100% of new projects environmentally certified	Launched	End-2025 and permanent	98.5% in the portfolio 100% in the pipeline	Group	<b>Opportunity:</b> increase in financing opportunities connected with developing sustainable real estate projects (green bonds, private or public investments, conservation financing, etc.).
# 9 - 25% energy consumption in 2030 (2019 baseline) > tertiary sector only > to be readjusted in 2025	Launched	End-2030	-30% at the end of 2024	Group	<b>Impact:</b> climate change <b>Risk:</b> tightening of regulations concerning the GHG emissions of companies. <b>Opportunity:</b> increase in financing opportunities connected with developing sustainable real estate projects (green bonds, private or public investments, conservation financing, etc.).
# 10 - 10% average water intensity in the operational control scope (2019 basis) And respect of thresholds set per portfolio (in m <sup>3</sup> /m <sup>2</sup> /year)	2024-2026	End-2030	-29% (Offices)/-24% (Hotels)	Group	<b>Impact:</b> overexploitation of water resources. <b>Risks:</b> <ul style="list-style-type: none"> <li>local conflicts related to water use, during the construction phase and the building use phase</li> <li>local shortages of drinking water.</li> </ul> <b>Opportunity:</b> increase in financing opportunities connected with developing sustainable real estate projects (green bonds, private or public investments, conservation financing, etc.).
# 11a Use electricity with guarantees of renewable origin for 100% of the operational scope	Launched	End-2025 and permanent	80%	Operational control	<b>Impact:</b> climate change <b>Risk:</b> tightening of regulations concerning the GHG emissions of companies. <b>Opportunity:</b> financial grants for the installation of solar panels or green roofs.
# 11b Double the production of solar energy in the Group's portfolio compared to 2023	2024-2026	End of 2030	1.3 GWh in 2024	Group	<b>Impact:</b> climate change <b>Risk:</b> tightening of regulations concerning the GHG emissions of companies. <b>Opportunity:</b> financial grants for the installation of solar panels or green roofs.
<b>Reduce dependency on new raw materials</b>					
# 12 Monitor the consumption of materials with the greatest impact on at least 80% of new development operations (e.g. concrete, glass, steel and aluminium).	2024-2026	End-2026	To be launched	Development (commercial and residential)	<b>Impacts:</b> <ul style="list-style-type: none"> <li>land use change, climate change</li> <li>overexploitation of water resources and pollution.</li> </ul> <b>Risks:</b> <ul style="list-style-type: none"> <li>creation and increase of the carbon tax affecting the import prices of materials (e.g. cement under the new EU ETS**)</li> <li>disruption of supply chains and material shortages due to extreme events (e.g. wood shortages due to forest fires, pests, concrete shortages due to water stress).</li> </ul> ETS**: Emissions Trading System.

Objective	Launch	Deadline	Situation at 31/12/2024	Scope	Link with IROs
<b># 13</b> Development of the use of [30]% recycled steel, [30]% recycled aluminium and [30]% low-carbon concrete and increase in volumes of recycled materials per m <sup>2</sup> built (* to be identified after diagnosis).	2026-2029	End-2030 and permanent	To be launched	Development (then operation)	<b>Impacts and risks</b> similar to the previous one. <b>Opportunity:</b> increase in financing opportunities connected with developing sustainable real estate projects (green bonds, private or public investments, conservation financing, etc.).
<b># 14</b> Development of partnerships with key players in the reuse and sustainable materials sector, by country	2024-2026	Permanent	Establishment of a dedicated working group	Group	<b>Impacts, risks and opportunities</b> similar to previous +. <b>Opportunity:</b> new renovation and deconstruction market, in line with zero net artificialisation policies.
<b># 15</b> Implementation of resource diagnostics for all large-scale demolition operations (> 5,000 m <sup>2</sup> lettable area) and commitment to retain/reuse (in situ or ex situ) 30% of materials (calculation in mass)	2026-2029	End-2030 and permanent	Diagnosis on Bobillot	Development (commercial and residential)	<b>Impacts, risks and opportunities</b> similar to the previous one.

### Pillar 3: Contribute to the improvement of biodiversity in cities

Objective	Launch	Deadline	Situation at 31/12/2024	Scope	Link with IROs
<b>Have a positive impact on biodiversity in 100% of operations</b>					
<b># 16</b> CBS improvement after the project compared to the situation before the project for 90% of new builds.	2024-2026	End of 2025	CBS x3.3 on projects annual (75% of deliveries 2022-2023)	Development (commercial and residential)	<b>Impacts:</b> change in land use. <b>Risk:</b> obligation to respect regulations on the limitation of urban planning, the artificialisation of soils and the protection of natural spaces (e.g. CBD target of 30% protected areas, green and blue corridors, etc.). <b>Opportunity:</b> use of the portfolio's green spaces to contribute to ecological continuity or to restore biodiversity in city centres (based on ecological diagnostics).
<b># 17</b> Net gain in biodiversity (based on indicators such as the amount of planted areas created, areas cleared of vegetation, consideration of green and dark corridors, etc.) on the 20 largest sites in the portfolio under direct management (scope to be defined after portfolio screening).	2026-2029	End of 2030	Not yet launched	Operations (under direct management) - Group	
<b>Promoting a culture of nature within teams</b>					
<b># 18</b> 100% of management trained in biodiversity issues in the sector	2024-2026	End-2025 and permanent	Done in 2024 via the preparation of this plan	Group	
<b># 19</b> Inclusion of ecologists in 100% of large-scale development/renovation projects (> 5,000 m <sup>2</sup> of leasable area) AND awareness-raising of operational teams on biodiversity issues.	2024-2026	End-2026 and permanent	Biodiversity contacts In France	Development (commercial and residential)	<b>Opportunity:</b> use of the portfolio's green spaces to contribute to ecological continuity or to restore biodiversity in city centres (based on ecological diagnostics).
<b># 20</b> 100% of new operations examined by the Investment Committee are subject to a biodiversity assessment (acquisition or development).	2025-2026	End-2026 and permanent	To be launched	Group	<b>Impacts:</b> change in land use. <b>Opportunities:</b> <ul style="list-style-type: none"> <li>new renovation and deconstruction market, in line with zero net artificialisation policies;</li> <li>increase in financing opportunities related to the development of sustainable real estate projects (green bonds, private or public investments, conservation financing, etc.).</li> </ul>
<b>Involve customers and stakeholders in biodiversity issues</b>					
<b># 21</b> Raising customer awareness on climate and nature-related topics and including these topics in commercial leases (biodiversity, climate, water, green space management requirements as recommended by the BiodiverCity label, etc.)	2025-2029	End-2026 and permanent thereafter	Awareness raising launched on climate and water issues	Group	

#### 3.2.4.5 Impact metrics related to biodiversity and ecosystems change (E4-5)

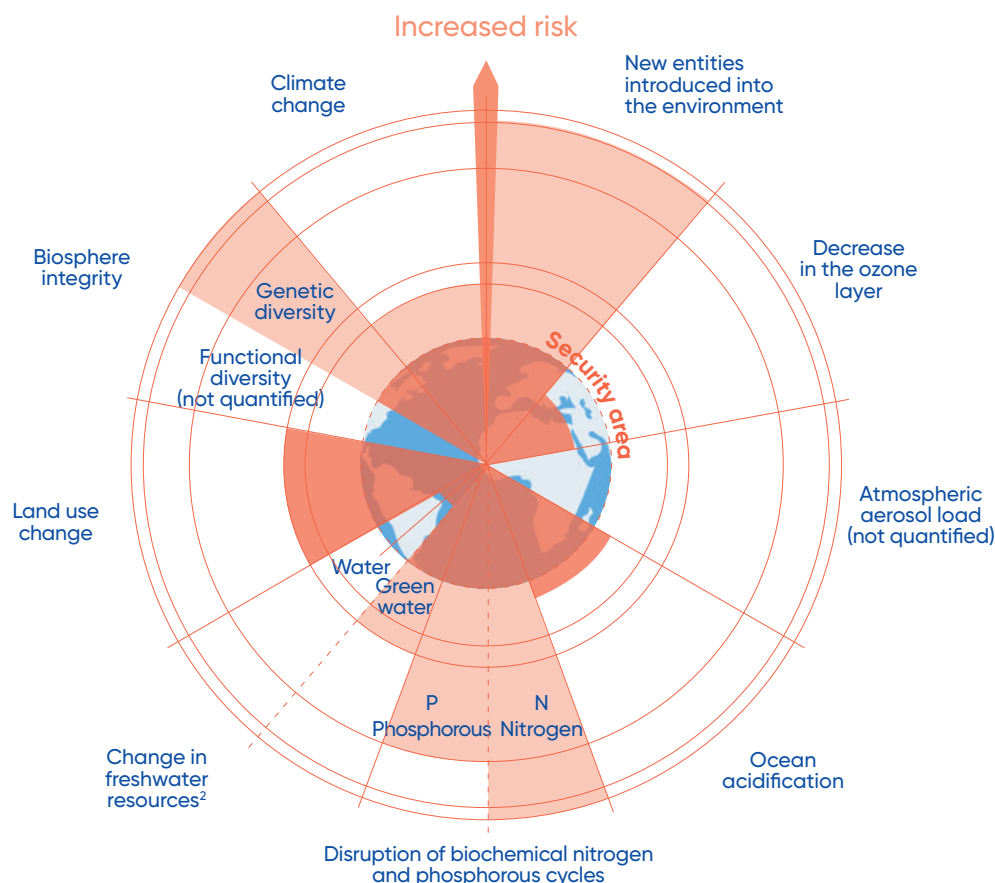
Biodiversity impact metrics are presented in section 3.2.4.1 and are of two types:

- an active grid analysis with the CBS (Biotope per Surface Coefficient) to measure the impact of operations on biodiversity at the scale of a site or a development project;
- a portfolio and Group analysis with the GBS (Global Biodiversity Score), which enables Covivio's impact on biodiversity to be determined by taking all of its activities and its value chain into account. Results: Static land impacts: 48 MSA.km<sup>2</sup>; Static aquatic impacts: 11 MSA.km<sup>2</sup>; Dynamic land impacts: 2 MSA.km<sup>2</sup>.

## Consideration of planetary limits

Planetary limits quantify the risks that human disturbances pose to the planet: for nine major processes involved in the functioning of the "Earth system", scientists<sup>(1)</sup> define nine boundaries. Crossing each threshold increases the risk of irreversibly destabilising the global environment, with major impacts on living beings and human societies. These thresholds include the erosion of biodiversity as well as other phenomena that also accelerate the loss of biodiversity: climate change, pollution, change in land use, etc.

### Planetary boundaries in 2023<sup>(1)</sup>



<sup>2</sup> Use of blue water (lakes, rivers and groundwater)/green water (ground moisture).

Covivio's GHG emissions reduction target is validated by the SBT initiative (SBTi), enabling the alignment with the planetary boundary relating to climate change to be validated. Covivio, which is aware of the many interactions between all the environmental dimensions that the planetary boundaries intersect, has chosen to extend the scope and range of its strategy objectives. The Group's Nature strategy now includes objectives on reducing the Group's impacts on water, soil, climate, resource use and the circular economy as well as biodiversity.

### Biodiversity mapping report for Covivio's portfolio

Covivio has, for several years, complied with version G4 of the Global Reporting Initiative (GRI). An assessment of the performance of the sites in relation to the GRI indicators was conducted on 16 office sites in this context, in 2015. Extended to 157 sites (sample of commercial and residential portfolios in each country), this study was updated in 2017 and 2020. These works have enabled the requirements of the GRI 304-1 (operational sites in or near protected areas and areas of high biodiversity value) and 304-4 (list of endangered species in areas affected

by activities) indicators to be met. They are summarised in Covivio's 2020 Sustainable Performance Report, published in 2021 (pages 92 and 93). The main conclusions can be summarized as follows:

by activities) indicators to be met. They are summarised in Covivio's 2020 Sustainable Performance Report, published in 2021 (pages 92 and 93). The main conclusions can be summarized as follows:

- operational sites located in or adjacent to protected, biodiversity-rich areas (Disclosure GRI 304-1). Conclusion: on criterion 304-1, Covivio's activity can be considered "Performing";

<sup>(1)</sup> Planetary boundaries have been defined and monitored by the Stockholm Resilience Center since 2009. <https://www.stockholmresilience.org/research/planetary-boundaries.html>

- description of the impacts of activities on biodiversity (Disclosure GRI 304-2). Conclusion: on criterion 304-2, Covivio's activity can be considered "Performing";
- protected or restored habitats (Disclosure GRI 304-3). Conclusion: on criterion 304-3, Covivio's activity can be considered as "Performing" to "Very efficient";
- impact of sites on species appearing on the IUCN red lists (Disclosure GRI 304-4). Conclusion: on criterion 304-4, Covivio's activity can be considered as "Very Performing".

The study conducted in 2024 and presented below goes further by studying the proximity of all Covivio sites in Europe to protected areas or more generally to sensitive biodiversity areas in Europe, in order to "identify sites with a high stake for local biodiversity and implement related measures.

## 1. Methodological elements

Scope: The study covers all the 1,641 Covivio sites held on 30 June 2024, classified according to the following typology:

- 510 "commercial" sites, covering offices with establishments in France, Italy and Germany and hotels;
- 1,131 "residential" sites in Germany (groupings carried out at the district level).

These sites are spread across 12 European countries, with more than 90% of sites concentrated in three main countries: Germany, France and Italy. The sites outside these three countries are all hotels.

**Definition of sensitive biodiversity areas:** The study was based on a cross-reference of the GPS coordinates of Covivio sites with the WDPA database (World Database on Protected Areas), listing:

- protected areas subject to specific regulations and/or having a national, European or international protection status: Natura 2000 areas, RAMSAR sites (wetlands), national and regional parks, biosphere reserves, etc.;
- other effective area-based conservation measures (AMCEZ): geographical areas "regulated and managed in such a way as to achieve positive and sustainable long-term conservation results" although they are not considered protected areas (e.g. areas managed by indigenous peoples, military reserves with access restrictions, etc.).

Because of the wide diversity of protected areas specific to each country and included in the WDPA database, only the main types of protected areas that were identified in the study are presented in the following list. The conservation areas (AMCEZ) did not feature in the study and are therefore not included in the list.

**Methodology:** This study identifies sites with high biodiversity challenges by superimposing the map of Covivio assets on those of protected/conserved areas in Europe. Conducted by UTOPIES, this work is structured around three stages.

## Step 1: Collecting information

- GPS coordinates of Covivio assets: sorting by activity (residential, commercial Germany, Italy and France, hotels) and location (country, region).
- Contact details of protected and conserved areas from the World Database on Protected Areas.

## Step 2: Analysing and processing of information

- Reconciliation and superimposition of information from the register of sites provided by Covivio and the WDPA database with geospatial calculation techniques (Python, Geopandas, RTree): calculation of the distance between each Covivio site and all protected areas located within a 10-kilometre radius, taking the closest point to the protected area as a reference.
- Classification of Covivio sites according to their proximity to the nearest protected/conserved area based on the following thresholds: In a protected/conserved area/Less than 500 metres away/Between 500 metres and 1 kilometre away/Between 1 kilometre and 5 kilometres away/More than 5 kilometres away from a protected area<sup>(1)</sup>.
- Analysis of results according to these categories, by country and by type of site (Residential, Offices, Hotels).

## Stage 3: Preparation of the study report.

## 2. Result

Out of all 1,641 Covivio sites, more than 25% are located in or less than 500 metres from a protected area and an additional 17% are located between 500 metres and one kilometre from a protected area. **In total, 42% of Covivio sites are located less than one kilometre from a protected area.** These sites are concentrated in the following seven countries: France, Germany, Italy, Spain, the United Kingdom, Belgium and Poland. **Germany and the United Kingdom stand out with nearly half of their assets concerned.** Initially, the results are presented in proportion to the number of sites and not in terms of surface area, to provide an overview of Covivio's exposure to sites that could have a negative impact on areas that are sensitive in terms of biodiversity. This diagnosis will then be broken down by surface area in 2025 in order to prioritise the actions to be taken.

Five sites are specifically located within a protected area:

- three sites in France;
- one site in the United Kingdom;
- one site in Germany.

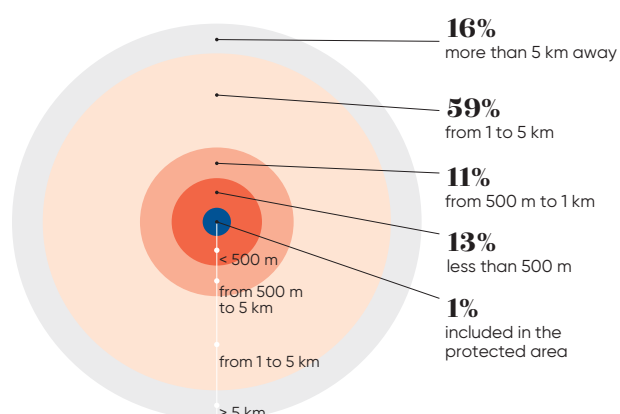
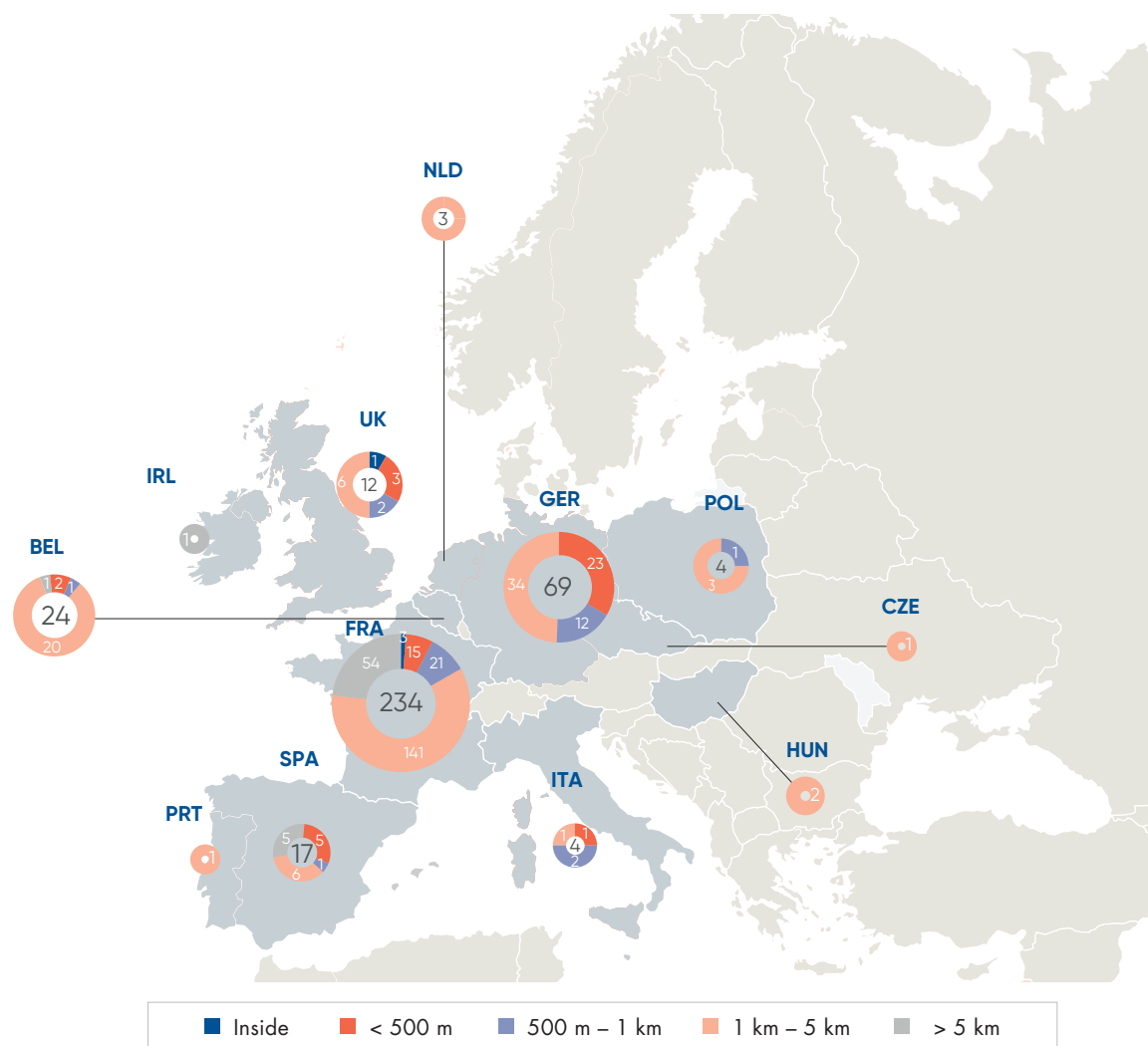
These include hotels and residential assets.

Europe-wide, the majority of Covivio's assets (more than 900 sites, or 58%) are located more than one kilometre from a protected area, but only 7% are more than five kilometres away.

<sup>(1)</sup> This study identifies assets with biodiversity issues in terms of their proximity to protected/conserved areas. As such, it does not include the potential impacts of Covivio assets on biodiversity beyond 5 kilometres (water pollution, emissions of volatile organic compounds, etc.).



Map showing the distribution of Covivio Hotels sites according to their distance from protected areas and by country



In light of these results, Covivio is analysing the sites in question more closely in order to:

- accurately identify the regulations that apply in the protected areas concerned and ensure that the site complies with them;
- conduct an environmental impact assessment to assess the project's current and potential effects on ecosystems;
- develop and deploy a local action plan to reduce and minimise the potential impacts of the site's operation (sustainable mobility, energy and resource management, compliance with sensitive periods, etc.).

These sites can also be privileged spaces to raise awareness and train Covivio teams as well as occupants in the challenges of preserving local biodiversity as part of the implementation of the Nature strategy.

### 3.2.4.6 Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities (E4-6)

#### **Focus on the hotel business as part of the objective of protecting and restoring biodiversity and ecosystems**

The Delegated Act <sup>(1)</sup> on the other four environmental objectives, including the protection of biodiversity, was published in June 2023. It introduces the hotel business within the scope of the taxonomy. For Covivio, this means that the revenue generated by its hotels in operation is eligible for the taxonomy. The alignment calculation, required for the 2024 fiscal year, will require compliance with five technical conditions, which themselves include detailed sub-criteria:

- contribution to conservation or restoration activities;
- action plan to contribute to nature conservation;
- sustainable supply chain and environmental management system;
- minimum requirements for classifying the performance;
- audit of the aforementioned information.

Covivio began the initial work of analysing these criteria in 2023, in order to begin collecting information on its hotel operating properties in 2024 and to be in a position to publish initial information in 2025.

(1) Delegated regulation – EU – 2023/2486 – EN – EUR-Lex



## 3.2.5 Resource use and circular economy (ESRS E5)

The objectives of the ESRS E5 are to understand which material resources are used by the company throughout its value chain and how it integrates the principles of the circular economy into its business model.

The circular economy is an economic system in which the value of products, materials and other resources in the economy is maintained for as long as possible, improving their efficient use in production and consumption and promoting reuse, thus reducing the environmental impact of their use, minimising waste and the release of hazardous substances at all stages of their life cycle.

According to the EU action plan for the circular economy, the transition of the European economy to a circular model is a prerequisite for achieving the objective of climate neutrality by 2050 and avoiding collapse of biodiversity.

The ESRS E5 standard builds on the existing European legislative framework, in particular the circular economy action plan, the waste framework directive and the industrial strategy for Europe.

### 3.2.5.1 Impacts, Risks and Opportunities of resource management and the circular economy (IRO-1)

Covivio incorporates the issues relating to the circular economy and resource management into the implementation of its CSR policy. The construction sector is heavily impacted by waste management. Firstly, due to the quantity of waste produced by its activities (46 million metric tons of waste generated by construction (excluding public works), which is 1.5 times the production of household waste by the French), but also because of its low recovery rate (between 40 and 60%)<sup>(1)</sup>. Resource management is also essential since the construction sector uses 50% of the raw materials extracted in Europe.

According to ADEME, the hotel and catering sector generates around 1.9 million metric tons of waste each year. Waste management has become a major issue for hotel establishments concerned with reducing their environmental impact. Waste management in the hotel sector is governed by strict regulations aimed at minimising the environmental impact. Decree No. 2016-288 of 10 March 2016 requires hotels producing more than 1,100 litres of waste per week to sort and collect five separate streams: paper, metal, plastic, glass and wood.

The anti-waste law for a circular economy (known as the AGECL law), adopted in 2020, reinforces these requirements by requiring restaurants with more than 20 seats to sort their bio-waste (food waste), from 2024. Used cooking oil (UCO) forms a category of hazardous waste because of its potential to pollute soil and water. Professionals in the hotel and catering industry who generate more than 60 litres of hazardous waste per year, including cooking oil, must sort it and have it collected by a company licensed by the prefect.

Hotels, restaurants and other establishments open to the public have since 10 February 2022 been required to provide water fountains for their visitors and employees, and are no longer permitted to distribute plastic water bottles.

The dual materiality analysis carried out at Group level highlighted the issues of "Waste management on its operational assets" and "Promotion of the circular economy and resource management in the context of its development projects" at quite different levels of materiality, the former being non-material and the latter material for Covivio. Given the importance of waste management in the running of a hotel, it was decided to combine these two issues at the end of the report on Covivio Hotels.

<sup>(1)</sup> Building waste | Regional planning ministries Ecological transition (French only)

## Summary table of IROs related to ESRS E5

ESRS E5 – CIRCULAR ECONOMY AND RESOURCE/MATERIALS MANAGEMENT	
<b>Description and key words</b>	Use of resources and identification of critical resources Sustainable, bio-sourced, recyclable, recycled and reusable materials Workers in the value chain
<b>Main impacts</b>	Impacts related mainly to the renovation activity of Covivio Hotels. They require the circular economy to be taken into account throughout the project. The AGECE law in France (Anti-waste and circular economy) aims to accelerate the transition <sup>(1)</sup> . Transition to 7-stream sorting on construction sites: metal, plastic, glass, wood and paper/cardboard + Mineral fraction waste: concrete, bricks, tiles, ceramics or stone/Plasterboard waste: plasterboard, honeycomb partitions, plasterboard or tiles Positive impact: participation in the development of the circular economy sector
<b>Positioning in the value chain</b>	Upstream, direct and downstream operations
<b>Main risks</b>	Financial risk difficult to estimate but the risk of difficulty in the supply of certain resources (timber) can delay projects and increase costs Reputational risk at project level: upgrading becomes a key element, including in the communication of companies in the sector A significant insurance issue: the introduction of reuse may be slowed down for this reason
<b>Materiality</b>	Material
ESRS E5 – WASTE MANAGEMENT	
<b>Description and key words</b>	Ensure selective collection in buildings Cost of waste management
<b>Main impacts</b>	72% of French people say they sort their packaging at home, but only 29% do so at work or in public places Waste management is a major issue in the hotel sector (particularly for restaurants)
<b>Positioning in the value chain</b>	Direct operations and, to a more limited extent, downstream
<b>Main risks</b>	Limited financial risk although there is an increase in the cost of waste management The risk to the continuity of activity in the hotel industry is linked exclusively to external factors (a strike by refuse collectors, for example). In this case, a reputational risk may be added to the risk of business interruption.
<b>Materiality</b>	Material

(1) FAQ-INEC-Batiment.pdf (institut-economie-circulaire.fr).

## A collective effort involving the entire sector collective work involving the entire sector

As part of the renovation and redevelopment of buildings, Covivio carries out resource diagnostics to identify the project's products, materials, equipment and waste and to define their potential for reuse and recovery, prioritising the most virtuous. Depending on the type of building, partnerships are forged with local players, which enables associations working in the region to become involved. These are mainly associations working in the field of workplace integration and back-to-work programmes, in view of the amount of dismantling, handling and sorting work involved.

In addition, Covivio implements low-nuisance construction site charters for its construction and renovation programmes. These notably govern the conditions for the choice of materials and

equipment, by encouraging its partners to use reuse, recycling and repurposing solutions. They establish an ambitious framework which is then incorporated into the specifications and contracts.

To continue to improve, Covivio is involved with works concerning the circular economy. These works are carried out with associations (Alliance HQE-GBC, BBKA, Orée, IFPEB, etc.), suppliers and the academic world. In 2020, Covivio's So Pop project participated in the HQE Circular Economy Performance test organised by the HQE-GBC Alliance, which tested material flow analysis (Building MFA), which enables circularity indicators to be calculated over the whole life of a building.

### 3.2.5.2 Policies related to resource use and circular economy (E5-1)

#### 3.2.5.2.1 Accelerate the transition to the circular economy in the context of development operations

The design and management of Covivio's buildings incorporates issues relating to the circular economy as part of the implementation of its CSR policy. This approach is aimed at separating economic growth from the depletion of natural resources by creating innovative products, services, business models and public policies. The Institute for the Circular Economy states that this involves, in particular, prolonging the flow of materials (reuse, recycling) and products (ecodesign avoiding planned obsolescence) throughout the life of a product or service". For Covivio, this can be summarised in two important ways:

- favour refurbishment over demolition/reconstruction. This type of operation requires a thorough cleaning of the building to be renovated, starting with a diagnosis to identify equipment or materials that can potentially be reused on site either as part of the future project or off site, by distributing them to platforms (free or for sale);
- consider the future of the building from the design stage to ensure that it is adaptable and flexible to integrate new uses. This step is key in extending the life of the asset.

The use of sustainable, recycled or more easily recyclable materials is now widespread in the Group's practices, consistent with the targeted environmental certifications. Awareness-raising actions are carried out among the teams to include the challenges of the circular economy into the Company's activities and day-to-day operations.

All these issues are covered by the certification targets set by Covivio as part of its development projects. This is notably the case for target 3 of the HQE standard, "Construction site with low environmental impact", which covers optimising waste management, limiting nuisances and pollution on the construction site, and limiting the consumption of resources on the site.

Development operations and renovations are also subject to strict rigorous waste treatment controls. As a result, dedicated procedures are put in place on construction sites to ensure recycling in accordance with these "low-nuisance construction sites" charters. Initiatives have also been launched to fight against food waste as part of the implementation of the European taxonomy for the construction activity (3.2.5.3.3).

#### A collaborative approach to promote the circular economy on projects

Covivio has set itself ambitious circular economy objectives in the context of its (re)development operations. These include the recycling and/or reuse of materials from cleaning and deconstruction as well as the reuse of materials and/or equipment sourced *in situ* or *ex situ* as part of its projects. Aware of the impacts of the sector and the possibilities offered by the projects, a working group was set up within the Development team in France to:

- review past operations to draw up a list of lessons learned and partners to engage as part of a reuse approach;

- steer future projects to ensure that a circular approach is adopted throughout the project.

This group's initial work resulted in the formulation of specifications defining the scope of intervention of a Circular Economy Project Management Assistance that could be called upon to work on a Covivio site. These specifications are also accompanied by a reuse assessment grid at the end of the construction site and a table showing the equipment/materials to be reused between Covivio projects.

The circular economy is the subject of regular discussions at Group level in the SD Meeting and within the Nature Strategy Monitoring Committee. This is a major subject in the context of the Nature Strategy (3.2.4.2).

#### 3.2.5.2.2 Waste transition for the operational portfolio

Covivio has established waste reporting for its assets that have been in operation for more than ten years. This reporting has helped develop the policy on this subject, which is based on two main approaches:

- the provision of selective sorting equipment for waste collection. Achieved: 100% selective collection in buildings in 2023 and 2024;
- raising end-user awareness: various measures can be implemented to improve the quality of sorting and the reduction of waste production at source, depending on the level of Covivio's operational control over the assets held.

In hotels with a restaurant, food waste is collected separately for reasons of hygiene and to comply with regulations. Anti-waste measures have been standardised for several years, under the impetus of regulations such as the AGECL law in France.

In 2024, Covivio began a process of obtaining Green Key certification for its hotel operating properties, and this portfolio will be fully certified by the end of 2025. For more information on Green Key: section 3.1.3.1.3.

Covivio is committed to limiting the use of single-use plastics as much as possible. For example, in the case of Covivio Hotel, 100% of the hotels owned and operated by Covivio Hotels are committed to a zero plastic approach, with initiatives that may vary depending on the brand: elimination of the use of individual water bottles in rooms, use of refillable bottles for shampoos or soap rather than single-use mini-bottles, etc.

#### 3.2.5.2.3 Sustainable procurement

Covivio has started to draw up sustainable procurement plans for certain categories of purchases for all the Group's activities (development, operation). Covivio's Nature policy, which applies to its activities, aims (objective 5) to monitor the origin of the materials and equipment used in projects by the end of 2026.

Sustainable procurement is defined as the process of integrating environmental and social criteria into the purchasing of goods and services in order to reduce environmental impact, increase social benefits and strengthen the economic sustainability of a project throughout the products' life cycle (definition by the Sustainability Purchasing Network, an organisation that promotes responsible procurement).



In order to follow this principle, the materials selected must have one or more of the following characteristics:

- be reused;
- have a certain recycled content;
- have environmental management certification;
- have a traceability certificate;
- come from the geographically closest sources whenever the performance and cost of the equipment and materials are identical.

The hotels owned by Covivio (under leases or operating premises) and with a restaurant have Responsible Procurement policies for food and beverages. These vary according to the brands, but overall, the focus is on the following commitments:

- purchases of sustainably harvested (MSC) or seasonal fish;
- no products from endangered species (meat, fish and shellfish products) on the menu;
- meat product with a sustainability label or short supply chain;
- use of products from free-range or organic poultry;
- introduction of a minimum quota for products from organic farming, fair trade, locally produced using environmentally friendly methods and/or from short supply chains;
- at least one vegetarian meal offered on the restaurant menu of the hotels;
- purchases of seasonal fruits and vegetables;
- communication and engagement with our suppliers and service providers;
- furniture made from FSC or PEFC wood;
- paper items (office and hygiene) made from sustainably managed forests.

### 3.2.5.3 Actions and resources related to resource use and circular economy (E5-2)

The actions presented below are specific to the Group's activities and are not exhaustive. Numerous initiatives in favour of the better management of resources and a circular economy are carried out with or by suppliers (particularly for construction) and managers, as the subject is closely connected to the corporate CSR policy of the brands. Implementation is carried out by operational staff (works departments) and monitored by the Nature Strategy Monitoring Committee.

### 3.2.5.3.1 Actions undertaken on development projects

As a developer, Covivio engages its stakeholders (suppliers, design offices, tenants, operators, etc.) on its construction sites through four key documents which define technical and environmental requirements, and which are required for each project certified in France:

- The environmental notice;
- The management system for the operation;
- The assessment of the building's environmental quality (HQE or BREEAM);
- The low-nuisance construction site charter.

The low-nuisance construction site charter applies to all parties involved in the construction site and details the environmental principles to be followed, as well as specific objectives for each project. It includes a list of recommendations on the following subjects (at a minimum): waste, noise, resource consumption, communication with local residents, materials, social aspects (comfort, safety, well-being). It explains each person's roles and sets specific objectives: for example, target 85% recycling of construction site waste, use 80% PEFC or FSC certified wood, etc. When it is no longer possible to reuse a material, the priority is to recover it or recycle it in the production of a new material.

### 3.2.5.3.2 Actions implemented for the operating portfolio

Covivio has been monitoring waste production on its sites for more than ten years (3.2.5.5.1) and ensures that selective waste collection facilities are available in all its buildings. One of the two major areas of this action plan is to raise awareness among end users, particularly in the head office buildings or in the hotels held as operating properties.

#### Single-use plastics

Given the Group's business, the production of plastic waste is mainly connected to hotel operations. During construction and renovation, priority for identifying action levers is given to materials with a high impact in terms of carbon and biodiversity, such as concrete, steel or aluminium.

In order to be exemplary in its assets under management, Covivio initiated a process aimed at moving towards "zero plastic" by the end of 2026, several years ago. This measure was notably championed as part of the Covivio 4 Climate (C4C) project. A process for identifying single-use plastics used at the sites was therefore set up in order to consider an alternative. All of the Group's headquarters buildings are equipped with water fountains and reusable crockery is available for employees. This action is accompanied by an awareness-raising campaign for employees on the subject, in particular to encourage them to choose reusable packaging for their meals, as this type of waste is one of the main flows identified in office buildings.

### The common thread, the example of L'Atelier

As part of its C4C approach, Covivio used the relocation of its European headquarters, which houses the management of Covivio Hotels, to introduce new waste reduction and management practices:

- waste sorting and recycling of 100% of paper and cardboard, collection and recycling of coffee capsules, collection of printer toner, batteries and plastic caps (for recycling) and gradual extension of sorting to other waste (metal, plastic, food, etc.);
- limited food waste via the redistribution to employees of preparations and dishes not consumed at the end of meetings/events;
- elimination of plastic water bottles and installation of water fountains;
- distribution of flasks made from recycled plastic;
- 100% of the paper used in Covivio printers is PEFC certified (paper from sustainably managed forests) and bears the European Ecolabel (based on the product's complete life cycle, its quality and its use). This paper policy applies to all printing and external administrative or commercial publications. Covivio also provides ePresse digital newspapers via QR Code in the communal areas.

### 3.2.5.3.3 Actions implemented for hotel operations

The buildings owned by Covivio Hotels are operated according to the standards defined by the different brands. Covivio Hotels set out an ambitious framework for waste management and combating food waste in the contracts (franchise or management) for the scope owned and operated as hotel operating properties. These provisions are in line with the action plans of the brands in this area and the Green Key label requirements that each hotel in the WiZiU scope must obtain by the end of 2025.

The waste section of the Green Key label (or Green Key in France) includes 16 criteria, 14 of which are mandatory. This label comprises a total of 120 criteria, 69 of which are mandatory.

Thus, according to the Green Key analysis grid, hotels must implement or strengthen eight actions for waste sorting and eight actions for waste reduction.

#### The 16 criteria of the Green Key label

Waste sorting	Waste reduction
Implementation of sorting for all categories of waste	A maximum of five food categories are individually packaged
Appropriate and safe management of hazardous waste	Elimination of disposable tableware
Frequency of collection and a sufficient number of containers to manage the volume	Limiting the use of printing and brochure paper
Provision of solutions if the frequency is insufficient or if the local authorities do not collect the sorted waste	Introduction of measures to limit food waste
Composting organic waste (on site or via a service provider)	Water carafes provided for customers when water quality permits
Measurement/estimation of the weight/volume of waste	Elimination of personal hygiene products in individual packaging
Sorting possible in rooms or at least in the hotel	Courtesy products available on request (recommended)
Clear and visible information concerning sorting locations and instructions	Purchasing policy aimed at reducing the volume of waste and the use of plastic (recommended criterion)

In addition, the label has developed a method for estimating the volume of waste in cooperation with WWF<sup>(1)</sup> to help operators make data on the subject more reliable.

### Combating food waste

The hotels operated by WiZiU have included the fight against food waste in their strategy in recent years and are pursuing this objective at the individual hotel level. For example, the Méri dien Nice is a partner of Too Good To Go. This mobile app enables users to collect fresh produce from local restaurants or shops, thus contributing to the fight against food waste.

(1) <https://www.greenkey.global/https://sustainablehospitalityalliance.org/resource/hwmm>

### 3.2.5.3.4 Main resources deployed

Waste management represents between 1% and 4%<sup>(1)</sup> of the operating budget of a building if an external service provider is chosen. In addition, companies are liable to pay the refuse collection tax. This is re-billed to the tenant. Although the budget for waste management is controlled, it is set to continue to rise in the future to include, in addition to collection costs, costs related to sorting equipment and raising awareness among end users.

In the development phase, the implementation of a circular economy initiative requires the mobilisation of different types of resources:

- technical and intellectual: mobilisation of the local ecosystem and key partners to ensure that the initiative is successful (associations, specialised companies, Engineering consultants/Project Management Assistance<sup>(2)</sup> Environment or circular economy);
- human resources: staff commitment in order to break old habits;
- financial: the additional costs associated with carefully removing the equipment on site, which can be offset by the resale of the reused equipment.

Although the financial equation remains difficult to balance, the increased skills in the sector and the experience gained on the projects will enable potential gains to be optimised in the medium to long term.

### 3.2.5.4 Targets related to resource use and circular economy (E5-3)

Covivio strives to comply with European legislation on waste for all of its building renovation programmes, Directive 2008/98/EC requires 70% (by weight) of non-hazardous construction and demolition waste to be processed for reuse, recovery or recycling. This criterion of a minimum of 70% is used as a criterion by the Taxonomy, and by Covivio as a minimum target on its construction sites.

#### 3.2.5.4.1 The objectives of the circular economy approach in development projects

Covivio has carried out life cycle analyses (LCA) since 2010, in order to quantify the environmental impacts of projects at each stage of their life cycle (construction, operation of the building and finally deconstruction). These LCAs are carried out based on the analysis of six modules: materials, energy, water, travel, construction site and waste. They have been key in the implementation of a circular economy approach in Covivio's operations. By setting targets for the use of recycled materials, Covivio is helping to reverse the trend of depleting the world's resources.

Covivio's Nature strategy is based on three pillars and 21 objectives. These go further than the regulations to ensure that environmental issues are given greater consideration in the Group's activities. After conducting a number of analyses, the circular economy emerged as a key issue for achieving the Group's climate and biodiversity objectives. Several objectives of the plan deal with this subject, as shown below in the extract from the table of objectives presented in ESRS E4 – section 3.2.4.4.

### Objectives of Covivio's Nature Strategy related to resource and waste management

Objective	Launch	Deadline	Situation at 31/12/2024	Scope
<b>Implement a traceability standard for key materials</b>				
<b># 5</b> Structure a traceability process for the main construction materials (concrete, glass, steel, etc.) used in operations	2024-2026	End of 2026	To be launched	Development (commercial and residential)
<b># 6</b> Strengthen the Responsible Purchasing policy by integrating and deploying new criteria for key materials (recycled, low-carbon, origin, etc.)	2026-2028	End of 2028	To be launched	Group (with a particular focus on development activities)
<b>Reduce dependency on new raw materials</b>				
<b># 12</b> Monitor the consumption of materials with the greatest impact on at least 80% of new development operations (e.g. concrete, glass, steel and aluminium).	2024-2026	End-2026	To be launched	Development (commercial and residential)
<b># 13</b> Development of the use of [30]% recycled steel, [30]% recycled aluminium and [30]% low-carbon concrete and increase in volumes of recycled materials per m <sup>2</sup> built (* to be identified after diagnosis).	2026-2029	End-2030 and permanent	To be launched	Development (then operation)
<b># 14</b> Development of partnerships with key players in the reuse and sustainable materials sector, by country	2024-2026	Permanent	Dedicated working group	Group
<b># 15</b> Implementation of resource diagnostics for all large-scale demolition operations * (> 5,000 m <sup>2</sup> lettable area) and commitment to preserve/reuse ( <i>in situ</i> or <i>ex situ</i> ) 30% of materials (mass calculation) (*to be identified after diagnosis).	2026-2029	End-2030 and permanent	Diagnosis in progress	Development (commercial and residential)

(1) PEMD diagnosis during the cleaning phase in France.

(1) Operating expenses in waste management: the complete guide – Businessplan-templates.com

(2) BET: technical design office/project management assistant.

### Project Management Assistance circular economy specifications

In conjunction with the dedicated working group set up in France (3.2.4.2), the following objectives were reiterated in the Project Management Assistance circular economy specifications for redevelopment projects, in addition to the objectives described above (in particular objective 15):

- obtain the BBCA or LCBI label for 75% of projects in France;
- for each operation, implement a circular economy approach and systematically carry out a PEMD diagnosis (Products, Equipment, Materials, Waste) during the cleaning phase;
- test a circular economy certification or label (CircoLab, Ecocycle, 2EC, Cradle to Cradle);
- achieve a recovery rate of 80% of the total mass of waste, including 50% through material recovery and 100% for inert waste;
- engage in a process of recycling existing glazing, a material found in Covivio's assets and using scarce resources (water, sand, etc.);
- and use low-carbon glazing.

These objectives are the minimum prerequisites and must be completed according to the possibilities offered by the project. These specifications are intended to be included in all new projects in France and to be shared at the European level.

More information in section 3.2.4.3, in particular concerning the link of these objectives with nature-related IROs.

### Low-nuisance construction site charters

The low-nuisance construction site charters drafted by Covivio for each of its certified developments in France also enable specific objectives to be set to ensure that all stakeholders on the site comply with a high level of environmental performance.

For example, the target for site waste recovery for the IRO project in Chatillon was set at 85%, including 50% material recovery. Accurate waste monitoring by type is also stipulated in these charters, outlining the best practices to be adopted.

### 3.2.5.4.2 Waste management objectives in the operational portfolio

Local authorities or their waste collection contractors do not provide information on the volume or tonnage of waste. In this context, Covivio is ensuring the standardisation of selective collection (100% selective waste collection in 2023 and 2024).

### Hotels - Operating properties

With the implementation of the Green Key label, the weight and/or volume of recyclable and non-recyclable waste must be measured or estimated. With 90% of hotels labelled (WiZiU scope) as of 31 December 2024, the data can now be consolidated and Covivio Hotels is planning to set a multi-year target for weight and volume in 2025.

### Corporate scope

Covivio has initiated a zero plastic initiative for buildings hosting its teams in Germany, France and Italy. This initiative enables solutions to be identified which can be replicated in the direct management portfolio. Covivio aims to stop using disposable plastic in the directly managed activities scope by the end of 2026. An inventory of the uses of plastic was therefore compiled and specific actions have been taken to identify alternatives to plastic.

### 3.2.5.4.3 Covivio's resource inflows (E5-4)

The dual materiality study highlighted that the use of inflow materials and products is not very material for Covivio. Moreover, this subject is already well covered by specifications and regulations. This subject mainly concerns construction materials on construction sites and in the context of the refurbishment of offices in operation. Covivio considers the traceability of materials to be a key element in the context of its Nature strategy objectives and is planning to collect more information on the quantities of resource inflows in the context of its development projects (on its supply chain).

In the case of hotels, material flows mainly concern the supply of food and drink and products provided in the rooms (shampoo, shower gel, toothbrushes, bottles of water, etc.).



### 3.2.5.5 Resource management and circular economy metrics (E5-5)

#### 3.2.5.5.1 Production and treatment of waste in the operating portfolio

##### Analysis of waste flows on the portfolio

The regulations differentiate between seven streams for which recycling is mandatory: paper, wood, metals, plastics, glass, mineral fractions and plaster. The collection of bio-waste has also been compulsory since 2024. What cannot be recycled is categorised as non-hazardous industrial waste (NHW) for the commercial sector and non-recyclable household waste for the residential sector. In particular, this includes soiled packaging or, for example, food waste in localities where the collection of bio-waste is not organised. This non-recyclable waste is then often channelled into energy recovery processes.

A reporting system is set up for assets with a contract with a waste removal company, in order to monitor the performance of the sorting and the different flows generated. However, it remains difficult to establish general statistics across the Group's portfolio, because waste production is heavily impacted by the services available on site and the type of users. The presence of restaurants or shops has a significant impact on the quantity and type of waste generated in the building, in particular by increasing the proportion of food or glass waste. Lastly, assets with green spaces generate green waste, which in most cases is handled by the green space management company.

##### Sector specificities

###### Corporate Offices

The paper/cardboard flow remains the majority in most cases, followed by recyclable and non-recyclable non-hazardous waste, in particular food waste and plastic food and metal packaging (bottles, cans, lunch boxes, etc.).

###### Hotel real estate

The flow of plastic packaging has been reduced in recent years thanks to the policies implemented by operators. Conversely, food waste is higher than in other sectors (breakfasts, catering). It is also possible to have textile waste.

Covivio and its subcontractors may be required to generate or collect hazardous waste, in the course of its activities, in particular:

- oils, solvents, aerosols, soiled rags;
- waste electrical and electronic equipment (WEEE).

This waste is subject to specific procedures and must be sent to the appropriate channels via specialised players. These services are usually included in facility management contracts to ensure that the building maintenance company respects these obligations. With respect to electronic waste (computers, smartphones), Covivio has set up various initiatives within its corporate scope to favour the maximum reuse of digital equipment. Specialised companies are therefore tasked with cleaning and making this equipment safe before it is repurposed. The programme has enabled the Covivio Foundation's partner associations to receive IT equipment on several occasions. Covivio is not involved in the production of radioactive waste.

However, because of the nature of its activity, this type of waste is not considered material and is not included in the table below.

For information, Covivio's electricity consumption in the operational scope in France generates 122 g of radioactive waste per MWh of electricity consumed. The data available on the Group's other locations does not allow similar equivalences to be given.

##### Analysis of waste flows on the portfolio

Waste production data is collected from various stakeholders:

- multi-tenant buildings: facility manager and waste removal companies when a private structure or local authorities are concerned. Waste data concerns the entire building (common and private areas);
- single-tenant: tenant or management structure of hotel operating properties (direct management).

The data can be provided:

- in the form of relatively detailed statements depending on the risks posed by the waste (hazardous or otherwise, etc.), recycled, etc.;
- estimated on the basis of diagnoses: in this case, the report specifies the estimated percentage. Some estimates are based on the frequency and volume of collection.

Details on processing methods are not systematically available and therefore do not enable this information to be consolidated at this stage. This is why only the proportion of waste that is recycled, reused or composted is indicated.



WASTE - ABSOLUTE	GRI	EPRA sBPR	HOTELS Operating properties	HOTELS EUROPE	
			2024	2023	2024
Coverage of the reporting scope by surface area (m²)			409,430	562,649	721,534
<b>Coverage of the scope (%)</b>			<b>72%</b>	<b>31%</b>	<b>43%</b>
Coverage of the scope (number of buildings)			25/54	34/308	49/279
Proportion of estimated data			26%	42%	27.1%
<b>Total non-hazardous waste (in metric tons)</b>	<b>306-2</b>	<b>Water-Abs</b>	-	-	-
<b>Waste intensity (in kg/m²)</b>			8	98	8.7
<b>Total non-hazardous waste (metric tons)</b>	<b>306-2</b>	<b>Water-Abs</b>	<b>3,271</b>	<b>5,506</b>	<b>6,284</b>
of which recycled, reused or composted waste	306-2	Water-Abs	1,432	2,172	2,477
<b>in%</b>	<b>306-2</b>	<b>Water-Abs</b>	<b>43.8%</b>	<b>39.4%</b>	<b>39.4%</b>
Assets equipped with selective sorting systems			100%	100%	100%
Waste production extrapolated			3,271	17,973	17,432

The "hotel operational control" scope was added this year following the growth of the Hotel operating properties business across the Group's activities. However, these hotels were already included in the total Hotel reporting on previous years.

On a like-for-like basis (Waste-Lfl), waste production decreased by 21%.

### 3.2.5.5.2 Production and treatment of waste in the portfolio under development

Waste data on construction sites is usually collected by project environmental managers, who are responsible for monitoring environmental certifications. The main aim of this reporting is to verify that the recovery objectives of each project are being met and, in parallel, to ensure compliance with the monitoring and treatment obligations for construction-related waste.

In France, the PEMD diagnostic (Products, Equipment, Materials, Waste) has been mandatory since July 1, 2023, replacing the waste diagnostic obligation introduced in 2011, for projects involving the renovation, deconstruction of more than 1,000 m² or any building that housed hazardous substances. The objective is to break down building PEMDs by optimising their reuse or recovery.

#### Different methods of processing PEMDs

- virtuous >>> >>> >>> >>> >>> >>> >>> >>> >>> >>> >>> >>> >>> >>> >>> >>> + virtuous																			
Disposal		Recovery												Reuse					
Storage Incineration without energy recovery		Energy recovery		Material recovery															
		Incineration with energy recovery		Backfill Conversion of waste into fuel				Recycling Reuse Regeneration Composting											

## 3.2.6 Contributing to the implementation of sustainable finance

Finance can be qualified as sustainable when it takes into account ESG criteria (Environment, Social, Governance); it includes socially responsible investment (SRI), solidarity finance and green finance<sup>(1)</sup>. Investors are increasingly taking ESG criteria into account in their analyses and investment choices. Covivio regularly organises roadshows focused on financial and ESG topics, or even exclusively on ESG.

Sustainable finance is a necessary lever to drive the transition to a carbon-neutral economy capable of limiting global warming. In Europe, the "Financing sustainable growth" action plan aims to provide major impetus to promote responsible investment. Foremost among the ten or so measures identified is the creation of a European Taxonomy, which aims to regulate the market for "green" or "sustainable" financial products and to direct investments towards activities that are compatible with Europe's ecological transition goals.

### 3.2.6.1 What compliance with the European "green" taxonomy?

The "green" taxonomy is intended to become the foundation on which future European regulations on sustainable investment will be based. The European Commission has set six major environmental objectives (detailed in the summary table below), and lists the activities that can make a positive contribution to them while not undermining the attainment of the other objectives (Do No Significant Harm – DNSH) and while respecting minimum guarantees on social and human rights issues. For each activity defined in this way, technical criteria must be satisfied in order to be able to claim that revenue, Capex or Opex is aligned with each objective. Covivio has therefore complied with the following requirements over the last four years (as at 31/12/N published in N+1) in order to comply with the regulations:

Year	Targeted objectives	Reporting obligation (Revenue, Capex, OPEX <sup>(1)</sup> )	Activities identified for Covivio
<b>2021</b>	Climate objectives: <ul style="list-style-type: none"> <li>● Climate change mitigation</li> <li>● Climate change adaptation</li> </ul>	Eligibility rate	Real estate activities: <ul style="list-style-type: none"> <li>● construction of new buildings (development) – 7.1</li> <li>● renovation of existing buildings – 7.2</li> <li>● installation, maintenance and repair: <ul style="list-style-type: none"> <li>● energy efficiency equipment – 7.3</li> <li>● instruments and devices for measuring, regulating and controlling the energy performance of buildings – 7.4</li> <li>● charging stations for electric vehicles inside buildings – 7.5</li> <li>● renewable energy technologies – 7.6</li> </ul> </li> <li>● acquisition and ownership of buildings – 7.7</li> <li>● specialized services related to the energy performance of buildings – 9.3</li> </ul>
<b>2022</b>	Climate targets	Eligibility and alignment rate: <ul style="list-style-type: none"> <li>● verification of substantial contribution criteria</li> <li>● Do Not Significant Harm</li> <li>● Minimum safeguards</li> </ul>	Real estate activities
<b>2023</b>	Climate + objectives: <ul style="list-style-type: none"> <li>● Sustainable use and protection of water and marine resources</li> <li>● Transition to a circular economy</li> <li>● Pollution prevention and control</li> <li>● Protection and restoration of biodiversity and ecosystems</li> </ul>	Climate objectives: <ul style="list-style-type: none"> <li>● Eligibility and alignment rate</li> </ul> 4 other objectives: <ul style="list-style-type: none"> <li>● Eligibility rate</li> </ul>	Real estate activities + : <ul style="list-style-type: none"> <li>● hotels, tourist accommodation, campsites and similar accommodation – Biodiversity 2.1</li> <li>● construction of new buildings* – Circular Economy 3.1</li> <li>● renovation of existing buildings* – Circular economy 3.2</li> <li>● demolition and dismantling of buildings and other structures – Circular economy 3.3</li> </ul> <p><i>* activities already included in the climate objectives</i></p>
<b>2024</b>	All objectives	Eligibility and alignment rate	Activities mentioned above and potential integration of new activities

(1) Given the small share of Opex which comes within the scope of the taxonomy compared to the total of the Group's Opex (less than 10%), this indicator is considered non-material.

(1) <https://www.novethic.fr/decryptages-dexpert/tout-savoir-sur-la-finance-durable#:~:text=La%20finance%20durable%20d%C3%A9signe%20des,vers%20une%20%C3%A9conomie%20plus%20durable> (French only)

### Focus on the hotel business as part of the objective of protecting and restoring biodiversity and ecosystems

The Delegated Act<sup>(1)</sup> on the other four environmental objectives, including the protection of biodiversity, was published in June 2023. It introduces the hotel business within the scope of the taxonomy. For Covivio, this means that the revenue generated by its hotels in operation is eligible for the taxonomy. The alignment calculation, required for the 2024 fiscal year, requires compliance with five technical conditions, which themselves include detailed sub-criteria:

- contribution to conservation or restoration activities;
- action plan to contribute to nature conservation;
- sustainable supply chain and environmental management system;
- minimum requirements for classifying the performance;
- audit of the aforementioned information.

Covivio Hotels began the initial work of analysing these criteria in 2023, in order to launch an information gathering process on its hotels and their assets from 2024, in order to identify the sites that might be eligible and to focus the action plan on them. The analysis having not yet been completed, Covivio Hotels currently reports a 0% alignment with this objective.

The taxonomy requires the use of 100% gross revenue, calculated in accordance with IFRS. However, to enable more comparable monitoring from year to year and to reflect operational reality, Covivio has also published indicators specific to its real estate activities. These indicators are based on the same data, by only using activities 7.1 to 7.7 and 9.3.

By focusing on the real estate definition, the following results are achieved on 31/12/2024:

Alignment of revenues by activity - Real estate scope	Covivio Hotels
Climate change mitigation	
Activity 7.1 - Construction of new buildings	N/A
Activity 7.2 - Building renovation	N/A
Activity 7.7 - Acquisition and holding	31.9%
<b>Total revenues aligned with real estate activities</b>	<b>31.9%</b>
<i>i.e.</i>	€ 86,284,011

The overall rate is up this year, thanks in particular to improved data collection. The impact of changes in the top 15% and top 30% thresholds is offset at Group level but remains uneven from one country to another. The analysis conducted on the asset level in the context of the implementation of the taxonomy indicators has enabled levers for rapid improvement to be identified for certain assets. Some assets may also satisfy the alignment conditions following the investments made in the context of the Group's carbon trajectory (3.3). In addition, improving the data collection process at the site level (waste recovery rate, energy labels for equipment, water flow rates for sanitary facilities) is a lever which has been identified to refine calculations for the development activity.

### Eligibility of the Revenues and Capex

By the end of 2024, the share of Covivio Hotels' revenues eligible for taxonomy is 100%, of which 53.9% is related to the biodiversity objective for the hotel business. If we consider the real estate perimeter, 46.1% of the revenues are eligible for the taxonomy. Given Covivio's activity, 100% of its Capex relates to real estate activities and is therefore eligible under the climate objectives, including Capex relating to non-eligible activities as they are linked to real estate assets held by Covivio.

### Revenue alignment - What is a green building according to taxonomy?

Approximately half of Covivio Hotels' eligible revenues and all the aligned revenues are generated by the property acquisition and holding activity (7.7). The revenues it generates can only be considered green for the purpose of climate change mitigation.

Three criteria can be taken into account for an asset which generates revenue that can be considered as green:

- 1) belonging to the regional top 15% in terms of primary energy consumption: Covivio here draws on the studies available to date and carried out at the national or European level, namely the Sustainable Real Estate Observatory (OID)<sup>(2)</sup> in France and the ESG Index Deepki<sup>(3)</sup> for other countries;
- 2) a class A energy performance diagnostic (or B for Italy and France given the breakdown of diagnostics in these countries<sup>(4)</sup> (source ZEBRA));
- 3) the NZEB -10% threshold is reached for buildings with planning permission after December 31, 2020: in France, this is equivalent to RT2012 -10% or RE2020 depending on the date of the planning permission.

There are also other substantial contribution requirements: buildings larger than 5,000 m<sup>2</sup> must be equipped with a BMS (Building Management System), and new non-residential buildings must be subject to a LCA (Life Cycle Assessment) and a thermal and airtightness study when they are constructed.

(1) [https://eur-lex.europa.eu/legal-content/FR/TXT/PDF/?uri=OJ:L\\_202302486](https://eur-lex.europa.eu/legal-content/FR/TXT/PDF/?uri=OJ:L_202302486)

(2) [https://resources.taloen.fr/resources/documents/6716\\_Taxonomy\\_OID\\_01.pdf](https://resources.taloen.fr/resources/documents/6716_Taxonomy_OID_01.pdf)

(3) <https://index-esg.com/>

(4) <https://zebra-monitoring.enerdata.net/>

## Capex alignment - What is a green Capex within the meaning of the taxonomy?

Unlike revenues, Capex can be "green" either in terms of mitigation or adaptation to climate change. It should be noted that while a Capex is green in terms of mitigation, it is also in fact green in terms of adaptation, in the light of the criteria of substantial contribution and DNSH for the activities identified.

This is because, for real estate activities, the Adaptation DNSH for the mitigation objective is identical to the substantial contribution criterion for the adaptation objective. The following table sets out the criteria for defining a "green" Capex according to its nature and the activity to which it relates.

	Acquisition and construction (all asset-related Capex, regardless of the nature of the Capex, including developments)	Renovation of existing buildings (additional DNSH: water, pollution, circular economy)	Green Capex "by nature"
<b>Mitigation</b>	Compliance with the definition of a green building (above)	30% gain in primary energy compared to the initial state	Installation, maintenance and repair of energy efficiency equipment (in accordance with the highest standards), charging stations for electric vehicles, energy performance management systems or renewable energy production equipment
<b>Adaptation</b>	Top 30% ownership or EPC NZEB for new buildings	Compliance with thermal renovation regulations	

Therefore, by the end of 2024, **84% of Covivio Hotels' Capex was aligned** with the taxonomy in terms of the adaptation objective <sup>(1)</sup>. This rate is an increase compared to last year. Thanks to extensive information reporting, Covivio Hotels identified around €5.1 million in energy efficiency Capex, i.e. 4% of total Capex.

### Breakdown of aligned CAPEX by sub-activity

Mitigation target (CCM)/Adaptation target (CCA)	Covivio Hotels	
	CCM	CCA
Activity 7.2 - Building renovation	N/A	N/A
Activities 7.3 to 7.6 - Efficiency measurements on existing buildings	3.7%	3.7%
Activity 7.7 - Acquisitions, Capex on aligned assets and developments of new buildings	16.7%	81.7%
Activity 9.3 - Services related to the energy performance of buildings	0.01%	0.01%
<b>Total (excluding double counting)</b>	<b>84.0%</b>	

### Climate analysis

As a substantial contribution criterion for adaptation Capex or DNSH for the mitigation objective, a climate risk analysis is compulsory in all cases to qualify a green activity. To address this need, Covivio drew on the MSCI Climate Value at-Risk study, which has been conducted since 2020 on the asset network (3.2.1.1.12). In order to use a worst-case scenario, as required by the taxonomy regulation, Covivio used the RCP8.5 scenario for this analysis of physical risks. If a risk is considered material for the asset analysed, an adaptation plan must be defined. Covivio in particular uses the adaptive actions guide of the Sustainable Real Estate Observatory (OID).

### Compliance with minimum guarantees

Covivio worked with a third party to review the compliance of its Group-wide minimum guarantee procedures and policies. The minimum guarantees referred to in Article 3(c) of the Taxonomy Regulation are procedures that a company implements to align itself with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights. These include the principles and rights set by the eight fundamental conventions mentioned in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and by the International Bill of Human Rights. The analysis conducted by Covivio was based on these guiding principles as well as the documents already published and the commitments made by the Group: Group Ethical Charter and internal procedures, Universal Registration Document, Communication on Progress of the Global Compact, Diversity Charter, Responsible Purchasing Charter, etc. No areas of concern were revealed following this analysis in relation to the following 10 study points: Human Rights Policy; Human rights and due diligence risk mapping; Prevention and mitigation actions and monitoring their implementation; The whistleblowing system; Communication; Consumer interests; Anti-corruption; Competition; Taxation; Media analysis (study of controversies).

<sup>(1)</sup> 17% with regard to the mitigation target.

## Summary table of taxonomic indicators at 31 December 2024

	Share of revenue/revenue		Share of Capex/Capex	
	Aligned	Eligible	Aligned	Eligible
Climate change mitigation	14.7%	46.1%	18.8%	100%
Climate change adaptation	0%	0%	84.0%	100%
Water and marine resources	0%	0%	0%	0%
Circular economy	0%	0%	0%	0%
Pollution	0%	0%	0%	0%
Biodiversity and ecosystems	0%	53.9%	0%	0%
<b>TOTAL REGULATORY DEFINITION</b>	<b>14.7%</b>	<b>100%</b>	<b>84.0%</b>	<b>100%</b>
	<b>31.9%</b>			
<b>TOTAL REAL ESTATE DEFINITION</b>	<b>(/REAL ESTATE ACTIVITIES)</b>	<b>46.1% (CLIMATE)</b>	<b>84.0%</b>	<b>100%</b>

Details of the results are presented in the appendix to the regulatory tables.

## Actions and indicators implemented with regard to the three compliance conditions of the taxonomy

Three conditions to be met	Examples of Covivio actions	Section	Indicators monitored
<b>The activity must contribute substantially to one of the six environmental objectives, detailed below.</b>			
1. Climate change mitigation	Construction and renovation of certified buildings with high levels of environmental performance European LCA specifications to make LCA more comparable Installation of high-performance equipment and materials (HVAC, facades, insulation, etc.) Installation of charging posts or charging bays for electric vehicles in new projects Reporting on environmental risks	3.2.1.1	Certification rate Multi-year work plan
	Annual reporting and target for reducing the portfolio's energy consumption Carbon trajectory	3.2.1.5	Energy intensity Carbon intensity and SBTi carbon trajectory
	Raising tenant awareness and environmental certification of assets in operation	3.2.1.5	Energy Performance Certificate (EPC) level
2. Climate change adaptation	Gradual adaptation of the portfolio via the delivery of buildings to the highest standards and energy renovation of the portfolio	3.1.3	Certification rate Multi-year work plan
	Monitoring of environmental risks and work on the resilience of the portfolio Deployment of a supervision system and generalisation of BMS on assets Environmental due diligence for acquisitions	3.2.2	Percentage of sites monitored for environmental risks
3. Sustainable use and protection of water and resources	Water consumption Specific construction site charters for certified projects	3.2.3.3	Portfolio water intensity
4. Protection and restoration of biodiversity and ecosystems	Biodiversity charters for construction and operation, biodiversity mapping, etc.	3.2.4.3	Percentage of sites analysed Biodiversity-certified surface area
5. Pollution prevention and control	Reporting on environmental risks Specific procedures on construction sites for the treatment of pollution	3.2.2.4	Percentage of sites monitored for health and environmental risks
6. Transition to a circular economy	Work on the circular economy: HQE Performance program Reuse of materials	3.2.5.3	Certification rate
Comply with performance criteria or standards and regulations	Use of certifications and labels for buildings and/or operations	3.1.3.4	Monitoring of certifications
	Low-carbon construction - ACV	3.1.3	SBTi approved carbon trajectory
	Analysis of the sizing of equipment/facilities	3.1.3	Technical studies site phase
	Compliance with recognized international standards for both financial and non-financial aspects	3.5.1	EPRA sBPR/TCFD/GRI/SASB standards
	Choice of location	3.3.4	Site phase studies
	Targeted resilience studies	3.2.1.1	Climate Value-at-risk
	Regulatory watch	3.2.1.5	

Three conditions to be met	Examples of Covivio actions	Section	Indicators monitored
<b>The company must respect the minimum social guarantees: compliance with the eight "fundamental conventions" of the International Labour Organization</b>			
The eight fundamental conventions are as follows:			
Convention No. 87 on Freedom of Association and Protection of the Right to Organize, 1948	As a signatory of the Diversity Charter and the Global Compact where it reaches the GC Advanced level (Global Compact – advanced level)	3.2.1.5 3.3.1.2.4	Publication of an annual Communication on Progress (COP) on the Global Compact website
Right to Organize and Collective Bargaining Convention, No. 98, 1949	Covivio strives to observe the eight fundamental conventions of the ILO, and to ensure that its suppliers comply with them.		Human Rights Policy
Forced Labor Convention, No. 29, 1930 + its 2014 protocol			
Abolition of Forced Labor, Convention No. 105, 1957			
Minimum Age Convention, No. 138, 1973			
Worst Forms of Child Labor, Convention No. 182, 1999			
Equal Remuneration Convention, No. 100, 1951			
Discrimination (Employment and Occupation) Convention, No. 111, 1958			

### 3.2.6.2 Financing indexed to ESG criteria

A pioneer in the issuance of Green Bonds since 2016, Covivio has taken a key step in aligning its financial policy with its ESG ambitions, by finalising the transformation of its bond issues into Green Bonds, thus enabling it to have a 100% green Covivio and Covivio Hotels bond portfolio (€3.2 billion and €1.45 billion). In addition, Covivio signed new corporate credit lines incorporating ESG criteria, reaching 64% of its total debt (vs 57% in 2023).

#### 3.2.6.2.1 Covivio Hotels, an additional milestone in 2023

In order to align its financial policy with its ESG ambitions and confirm its pioneering role in the hotel industry, Covivio Hotels became the first hotel real estate company in Europe to adopt a Green Financing Framework in 2023, with the commitment that its next bond issues will be carried out in Green Bonds format. Under this Green Financing Framework, eligible assets in operation must meet at least one of the following criteria:

- 1) carbon intensity of the asset below the consumption threshold necessary to comply with the 1.5°C trajectory of the Paris Agreement, as adopted by CRREM and validated by SBTi (Science Based Targets initiatives);
- 2) full alignment with the taxonomy for the acquisition and holding of real estate assets;
- 3) HQE Excellent/BREEAM Excellent/LEED or DGNB certification "Gold" or higher.

Consistent with its historical commitments, the assets must also be located less than 500 metres from public transport and the new leases must have green clauses.

In addition, Covivio Hotels has provided for the possibility of including financing for new buildings, refurbishments, the installation of renewable energy production equipment and energy efficiency work.

At the end of 2024, €4.1 billion (€3.3 billion net of the external financial debt already allocated) of hotel assets were eligible for this Green Financing Framework. Covivio Hotels plans to increase this share, in particular thanks to the continuous improvement of the quality of its portfolio and has financed €5.1 million of energy efficiency Capex in 2023 as part of this Framework.

Moody's Investors Services, in its Second Party Opinion, acknowledged the quality of the Green Financing Framework by assigning it a rating of SQS 2 Very Good, consistent with the best ratings in the European real estate sector. The overall contribution of the Green Financing Framework to sustainable development is qualified as "Significant" and its alignment with the Green Loan/Bond Principles as "Best Practices".

#### 3.2.6.2.2 Verified performance

In addition to the internal verifications carried out to ensure compliance with the eligibility criteria, Covivio once again asked Moody's ESG (formerly Vigeo-Eiris) to conduct a Second Party Opinion. Furthermore, Covivio undertakes to engage an independent third party annually to check that funds are being allocated correctly in accordance with the principles of the Green Bond Framework, and environmental performance indicators. The audit report of the independent third party is published on the Covivio website, and in this document in Chapters 3.6.1, 3.6.2. The indicators selected for the Green Bond and verified by the independent third party are consistent with the GRI Standards indicators and the recommendations of the Green Bond Principles. They cover the portfolio reporting indicators (3.2.1.5).

#### Green Bonds Hotels portfolio impact indicators

The portfolio which is eligible for Covivio Hotels' Sustainable Financing Framework amounts to € 4.1 billion (€ 3.3 billion net of external financial debt already allocated). Its geographical distribution is as follows: France (37%), Germany (25%), UK (14%), Italy (9%), other European countries (26%). Covivio Hotels, with €2 billion (€1.6 billion net) of assets aligned with the European taxonomy climate change mitigation objective (exclusively for activity 7.7 of the acquisition and holding of real estate assets), can cover 100% of its issues (i.e. €1.45 billion) with aligned assets (substantial contribution criterion, DNSH and minimum guarantees in accordance with its framework).

Indicators	Performance
Breakdown of funds by category	99.8% Green Building/0.2% Energy performance
Breakdown of funds by type of financing	99.8% refinancing/0.2% financing
Total energy consumption and intensity (final energy)	207,181 MWh <sub>fe</sub> - 168 kWh <sub>fe</sub> /m <sup>2</sup> /an 42% green electricity
Total energy consumption and intensity (primary energy)	295,141 MWh <sub>pe</sub> - 239 kWh <sub>pe</sub> /m <sup>2</sup> /year
Solar energy production	18.3 MWh
Greenhouse gas emissions and intensity	23,092 tCO <sub>2e</sub> - 18.7 kgCO <sub>2e</sub> /m <sup>2</sup> /year
Change in greenhouse gas emissions compared to N-1 (like-for-like scope)	-7.6%, i.e. a saving of 1,982 tCO <sub>2e</sub> /m <sup>2</sup>
Greenhouse gas emissions avoided (compared to a benchmark intensity - IndexESG Deepki)	30,680 tCO <sub>2e</sub>
Total water consumption and intensity	1.6 million m <sup>3</sup> - 1.38 m <sup>3</sup> /m <sup>2</sup> /year
Waste generation and recycling rate	4,544 t - 36% recycled Coverage rate: 48%
Accessibility to public transport	100% less than 500 m from public transport
Environmental certification rate	99.9% including hotel labels
Taxonomy alignment rate (climate change mitigation target)	49%, i.e. €2 billion (€1.6 billion net), thus covering 100% of Covivio Hotels green issues
Investments directly related to the improvement of the energy performance of the portfolio (activity 7.3 of the taxonomy)	€5.1 million

The list of eligible assets is available in section 3.5.2.

### 3.2.6.3 Information on the SFDR regulation for Covivio's financial partners

Information for financial institutions in the context of the SFDR regulation (European Directive on non-financial reporting for financial institutions).

Negative impacts on sustainability factors		Metric	Impact [2024]	Explanations	Actions taken and actions planned and objectives set for the next baseline year
Fossil fuel	1. Exposure to fossil fuels via real estate assets	Share of investment in real estate assets used for the extraction, storage, transport or production of fossil fuels	0%	Covivio invests in real estate assets. None of these buildings is dedicated to the extraction, storage, transport or production of fossil fuels.	
Energy efficiency	2. Exposure to energy-inefficient real estate assets	Share of investment in energy-inefficient real estate assets	Covivio Hotels: 35.7%	Share of assets (in value) that do not have at least a class C Energy Performance Certificate (EPC) or do not belong to the regional top 30% (see methodology used for the taxonomy <sup>(1)</sup> )	Energy: 3.2.1.5 Carbon: 3.2.1.3.

(1) For the purposes of harmonisation with the taxonomy, Covivio has adopted the DNSH relating to climate change mitigation, given the limitations of only taking Energy Performance Certificate (EPC) into account as a criterion for assessing energy efficiency.

All environmental data (energy, carbon, renewable energies, water, waste) relating to the Group and Covivio Hotels and Covivio Immobilien are presented respectively in Sections 3.2.1.5, 3.2.1.6, 3.2.3.4, and 3.2.5.5.

Governance, ethics and human resources criteria are also included in this document, in particular in sections: 5.3 (governance structure and composition of governance

bodies), 3.1.2.4.2 and 3.1.2.2.5 (dual materiality analysis and CSR risk mapping), 3.3.1.3 (employee relations and social dialogue), 3.3.1.5 (remuneration and pay gaps, 4.2.6.9 (taxation), 3.3.2.2.2 (Human Rights).

Covivio's Ethical Code is also available to all its stakeholders on its website.



## 3.3 Social information

### 3.3.1 Own workforce (ESRS S1)

The purpose of the ESRS S1 standard is to explain the company's strategy concerning its own workforce, differentiating between employees and non-employees of Covivio Hotels.

This standard covers a range of issues relating to working conditions, social dialogue, collective bargaining, work-life balance, health and safety, equal treatment, etc. It also aims to ensure that the Company's practices conform with international conventions on Human Rights.

Working conditions, diversity and equal opportunities, and respect for labour rights and human rights were rated as a single issue in the materiality analysis of Covivio Hotels. They are presented separately above for ease of reading.

ESRS S1 – WORKING CONDITIONS	
<b>Description and key words</b>	Well-being at work/Quality of life at work/Work-life balance Social dialogue Accidents and health/safety at work
<b>Main impacts</b>	Impact on labour relations in the event of operational organisational difficulties (scheduling, workload, absenteeism) Impact on the health and safety of employees in what are sometimes demanding working environments and stress at work
<b>Positioning in the value chain</b>	Direct operations
<b>Main risks</b>	Health/Safety risk: workplace accidents (falls, cuts, burns in the kitchen)/occupational illnesses Financial risk: additional recruitment costs Potential risk of loss of skills and know-how in the event of high turnover or low ability to attract, retain and develop talent
<b>Main opportunities</b>	Business continuity Employer brand
<b>Materiality</b>	Material
ESRS S1 – DIVERSITY AND EQUAL OPPORTUNITIES	
<b>Description and key words</b>	Discrimination, inclusion, gender equality
<b>Main impacts</b>	Impact on the well-being of affected employees. Limited impact at Covivio Hotels level given its direct activities and commitments to equal opportunities
<b>Positioning in the value chain</b>	Direct operations
<b>Main risks</b>	Financial risk: in France, the maximum fine for discrimination is €45,000 (and three years' imprisonment) Reputational risk in the event of discriminatory practices
<b>Materiality</b>	Material
ESRS S1 – RESPECT FOR LABOUR RIGHTS AND HUMAN RIGHTS	
<b>Description and key words</b>	Forced labour, child labour Respect for employees' personal data
<b>Main impacts</b>	Impact limited in frequency but which could have a material impact on the well-being of employees if it occurs (for the respect of personal data) The impact of Covivio Hotel on forced labour and child labour is very low because its hotels are located in Europe.
<b>Positioning in the value chain</b>	Direct operations
<b>Main risks</b>	Financial and/or reputational risk: growing demand from investors and rating agencies
<b>Materiality</b>	Material

### 3.3.1.1 Social policy: European human capital that creates value (S1-1)

Covivio Hotels is a major player in the hotel sector, recognised for its excellence of service and customer satisfaction. The hotels operating properties are operated by different managers and operators. Each has its own recruitment and staff management policies. Nevertheless, they have strong similarities, because of the specificities of the hotel sector. The policies presented in this section apply to the scope of the hotel operating properties operated directly by the WiZiU subsidiary or by other operators. They are aimed in particular at employees and, in a certain number of (specified) cases also non-employees. The majority of Covivio Hotels hotel operating properties are under contract to a brand.

Covivio Hotels' social policy is based on Covivio's social policy. Convinced that sustainable success is based on an ambitious and long-term human resources policy, Covivio and its subsidiary strive on a daily basis to create the conditions so that the women and men comprising their teams can develop their full potential.

Identified as a major CSR risk from Covivio's CSR risk mapping, the "Skills/Attractiveness/Diversity" issue (ESRS 2, section 3.1.2.2.5) covers the various aspects related to the importance, for the sustainability of Covivio's model, of retaining and developing talent while promoting strong values of equality and inclusion.

The hotel business lines not only require technical expertise, but also interpersonal skills and the ability to adapt to an international clientele with a variety of demands. A proactive approach is required in order to attract and retain the best talent in an environment characterised by strong seasonality and increasing competition. This involves innovative recruitment policies, training programmes tailored to the needs of employees and opportunities for internal development that promote commitment. Flexibility and rewards for hard work, especially during busy periods, are also essential for building a close-knit and high-performing team.

The double materiality study (ESRS 2, section 3.1.2.4.1) highlighted these strong social issues, stemming from the specific nature of the jobs. This is especially the case for the issue "S1-Clean workforce Working conditions, Diversity - Human rights", which is particularly important in the hotel sector.

The reporting scope for human capital in ESRS S1 covers all employees for whom Covivio Hotels has a contractual liability. All employees of leased hotels are excluded. For hotels held as operating properties, liability is determined by the type of contract signed with the operator of the asset. The table below presents the various cases identified in the portfolio, and reported in the Universal Registration Document (URD) of Covivio Hotels or that of the Group.

#### Types of employees by activity

Business activity	Country	Employees	Non-employee workforce	Presented in
Headquarters and support services	France	Employment contract direct	Interns, seconded employees (temporary work, placement), self-employed workers	Covivio URD
WiZiU Hotels held as operating properties	France and Belgium	Direct employment contract with the relevant WiZiU entities	Interns, seconded employees (temporary work, placement), self-employed workers	Covivio Hotels URD
Managers of Hotels held as operating properties	4 countries	Indirect management contract	Interns, seconded employees (temporary work, placement), self-employed workers	Covivio Hotels URD
Managers of Hotels held as operating properties	2 countries	Reverse management contract: the workforce are the employees of the manager	Interns, seconded employees (temporary work, placement), self-employed workers	N/A

### The different types of contracts:

- **Direct contracts:** entered into by Covivio Hotels or WiZiU, a subsidiary of Covivio Hotels.
  - The following are designated as "employees": the workforce on permanent contracts, temporary contracts, work-study contracts (apprenticeship and professional training) for students on initial training; in this case, Covivio Hotels or WiZiU is the direct employer who recruits, pays, etc.
  - The following are designated as "non-employees": self-employed workers, workers seconded under contracts concluded with temporary employment agencies and placement agencies (in reference to the NACE Code N78), trainees under agreements. Personnel who work on site but who provide security or IT maintenance services, for example, do not fall within this scope but are subcontracted.
- **Indirect contracts:** entered into by a Covivio Hotels manager and relating to the hotel activity (operation of a business asset) in the context of hotel operating properties. In this case, Covivio Hotels does not directly manage the employees: they are recruited and paid by the manager, who has disciplinary power over the workforce. Covivio Hotels makes recommendations to managers in order to be aligned as closely as possible with its HR and Human Rights policies.
- **Reverse management contracts:** also concluded by a manager of Covivio Hotels and relating to the hotel operating properties business activity. In this case, the manager of the hotel becomes the sole employer of the employees. All human resources responsibilities (recruitment, training, day-to-day management of staff) are handled by the manager.

The Human Resources (HR) policy developed by Covivio Hotels for its head office staff is based on Covivio's policy. It is centred on four fields of action that form part of the 2020-2025 objectives detailed in this chapter, namely:

- professionalisation and the pursuit of business excellence at all levels;
- a fair remuneration policy, directly linked to performance and achievements;
- exemplary management close to the teams;
- transparent and constructive social dialogue.

The Human Resources policy in the hotels operated by WiZiU is part of a commitment to innovation and human engagement, aimed at attracting, retaining and developing talent in a stimulating and inclusive environment. The priorities are structured around four main pillars:

- **Equality, diversity and inclusion:** WiZiU is firmly committed to promoting gender equality, valuing diversity and cultivating an inclusive culture where every employee, regardless of their origins or differences, finds their place and contributes fully to the collective adventure.

- **A human and rewarding work environment:** WiZiU makes a point of offering its employees an environment where respect, collaboration and well-being are priorities. WiZiU strives to develop a fulfilling work environment that fosters creativity and performance.
- **Proactive management of careers and skills:** the recruitment policy embraces innovative techniques, integrating high-performance digital tools to identify the best talent. WiZiU invests in customised training programmes and constant support, enabling everyone to build a rich and progressive career within the company.
- **Stability and recognition:** stable employment contracts are preferred, with more than 90% of the workforce on permanent contracts. Performance is valued through fair and transparent remuneration policies.

These priorities place people at the heart of WiZiU's strategy, in order to build a resilient and innovative organisation, capable of meeting the challenges of the hotel sector while responding to the aspirations of the teams.

Covivio's location within the European Union, means that its salaried and non-salaried staff benefit from a favourable social model due to legislation. Health, safety and working conditions, working hours, entitlement to paid leave, compulsory training, unemployment or sickness protection, minimum wage, gender equality, freedom of association and social dialogue, right to disconnect... these are all areas in which the European Union defines minimum standards to guarantee the protection of workers on its territory. Covivio Hotels' social policies strive to surpass them whenever possible.

Although some matters are dealt with locally by the managers of Covivio Hotels (recruitment, negotiation of agreements, etc.) with due regard for local practices and regulations, many others involve shared objectives and values. Thus, the values relating to diversity, social dialogue, quality of life at work, prevention of discrimination and personal development are shared in all hotels.

Covivio Hotels did not resort to any form of short-time working or staff cuts for economic reasons in 2024 and has no restructuring plan involving redundancies planned for 2025.

### 3.3.1.1.1 Challenges related to skills and attractiveness

Covivio Hotels operates in a sector where human capital plays a key role in the Company's success. The challenges relating to skills and attractiveness were identified in the context of the dual materiality analysis as major issues for the development of its activities.

The human capital risks are related to the potential loss of skills and know-how due to high turnover or a poor ability to attract and retain talent; a failure to develop existing skills due to a lack of investment in training; psychosocial issues (dissatisfaction at work, occupational illnesses) if they were not prevented and, where appropriate, treated; or even to discriminatory practices in the absence of awareness and whistleblowing mechanisms, resulting in a high reputational risk.

#### 3.3.1.1.1.a A recruitment policy adapted to the challenges of the hotel sector

The recruitment policy complements the strategy and the development of the business model of the hotels held as hotel operating properties. The recruitment process has a common core in all hotel operating properties. Personal interviews are systematically held on site and enable the candidate's technical and non-technical skills to be assessed, as well as their commitment to the Company's values. In Germany, a trial day is often organised to test candidates' practical skills before making them a suitable job offer.

Selection criteria include specific technical skills, relevant practical experience, as well as non-technical skills such as communication, ability to work in a team or find solutions. Recruitment managers pay increasing attention to candidates' soft skills (behavioural skills). Although they remain important, qualifications tend to take up less space in the recruitment process. English language skills are also required. In addition, candidates must be flexible, as working hours are variable during the week and on weekends.

#### WiZiU: the use of IT tools to improve recruitment processes

WiZiU's recruitment policy is based on centralised and harmonised management *via* the use of an ATS (Applicant Tracking System). This system enables all job vacancies to be centralised thereby guaranteeing harmonisation of content and increased visibility. The use of standardised job offers reinforces the consistency of communication and the alignment of hotels in a multi-brand management context. This system has significantly improved recruitment efficiency, as is evidenced by the results: the ratio of eight applications per offer in 2022 increased to 23 in 2023, then to 44 in 2024.

Apart from the figures, this approach aims to enhance the candidate experience while simplifying the processes for the recruiting managers. The ATS offers an intuitive interface to follow each stage of recruitment, from the publication of the vacancy to the onboarding of the talents. This system also favours informed decision-making, based on clear indicators and consolidated data. This tool will improve the efficiency of exchanges with candidates, while helping to ensure fair, objective and informed recruitment decisions. In 2025, the priority will be to develop a structured interview guide and reinforce the recruitment training of managers. WiZiU, by adopting this structured and modern method, is creating the right conditions to attract the best talent, while developing agility and innovation in its recruitment processes.

In 2024, the number of temporary contracts represented a small percentage of the workforce:

- 4% for WiZiU;
- 12% for other hotel managers within Covivio Hotels hotel operating properties.

The proportion of permanent contracts, 89% for WiZiU and 73% for all Covivio Hotels employees shows how important talent retention and trust are considered in the development of the company.

#### Covivio Hotels workforce in 2024:

WiZiU: 583 employees;

Other managers of hotel operating properties: 986 employees;

Covivio Hotels head office: 19 employees.

The table in section 3.3.1.5.1 shows the different social indicators for employees of Covivio Hotels' hotel operating properties. The social indicators for Covivio Hotels head office employees are presented in Chapter 3, section 3.3.1.5.2 of Covivio's Universal Registration Document.

#### Recruitment procedure for corporate employees of Covivio Hotels

The Group's recruitment procedure is followed for employees of the Covivio Hotels head office. The candidates have the opportunity to gain a concrete insight into the company and understand its strategic challenges through four interviews, which are designed to be discussions. An interview is held with the General Management at the end of the recruitment process, which is designed as the first stage of a genuine working partnership. An English test is included in the process, in accordance with the Group's European integration requirements. Candidates are also asked to complete a personality questionnaire, which serves as a basis for discussion of their behavioural skills during the HR interview. Summaries of their personalities and motivations are automatically generated after completing the questionnaire.

#### The stages of the recruitment process:



In 2024, Covivio Hotels recruited 282 employees on permanent contracts, including 181 at the WiZiU level.

A welcome booklet is given to each new employee. This booklet contains key information about life in the Company (onboarding process, remuneration structure, time and absence management, etc.). Once recruited, each new employee participates in an onboarding programme, which consists of several parts: an induction day, during where representatives from each department present the essential aspects of their job, and an insight report is given to two members of the Management Committee. The integration process ends with a friendly get-together with the Chief Executive Officer.

#### **The recruitment process in hotels operated by WiZiU**

The strategy for attracting talent includes using social networks to communicate directly with candidates, and ensuring transparency in the recruitment process.

Recruitment needs for hotel employees (reception, catering, cleaning, etc.) are examined by each individual hotel and decided according to trends in the site's activities.

WiZiU's recruitment procedures are adapted according to the vacancies to be filled, in order to ensure a relevant and effective assessment of the candidates.

- The process for operational positions is limited to a single interview with the manager and/or HR manager, followed by a validation at the end of this interview. The recruitment process for a head of department position involves an interview with HR and the Hotel director, thus ensuring a dual assessment.
- The candidate for a management or support position is interviewed by the HR Director, the relevant N+1 and, if necessary, WiZiU's Chief Executive Officer, thus enabling a collegial and informed decision to be made.

Employees receive regular HR support, particularly during the onboarding period, in each country where Covivio Hotels owns hotel operating properties. The onboarding process is not uniform because it depends on the operator of the hotels. Nevertheless, certain steps are mandatory, regardless of the brand. For example, in all onboarding programmes, either an induction day or an individual appointment is arranged to present key information about the hotel. These induction days or sessions are essential, especially to present the brands under which the hotels are operated through their franchise agreement. It is also an obligation required by the franchise agreement.

#### **3.3.1.1.b A policy for attracting and employing young talent**

##### **Create partnerships with schools**

Partnerships have been formed with local and specialised schools, and the employer brand is strengthened by participating in job fairs and application days. Conferences and hotel visits are organised for students to offer them work placements and apprenticeships.

Trainees follow a structured onboarding process. They receive training and benefit from regular supervision from the hotel managers and teachers. The hotels operated by WiZiU also offer mentoring, rewards and recognition to encourage their development within the structures.

#### **Hotel Westin Leipzig**

The hotel has created partnerships with local schools. It has established partnerships with the city of Leipzig for student work placements. It also participates in Leipzig's "Training Night", an annual event focussed on career guidance and training. This evening event, which is organised by various educational institutions and local businesses, enables young people, students and people changing careers to find out about the training and apprenticeship opportunities available in the region.

#### **Reduce the turnover**

The turnover in the hotel industry is high, and is influenced by several factors:

- working conditions are often demanding, with irregular hours including evenings, weekends and holidays;
- seasonality also plays a significant role, especially in tourist regions where employment is often seasonal, contributing to turnover;
- the younger generations, less attached to one company, prefer to have a variety of work experiences, which increases the turnover rate;
- the working environment can be stressful at times;
- remuneration in the sector, although competitive, may seem less attractive compared to others;
- the post-Covid-19 era has seen a large exodus of talent from the sector, which has further exacerbated the turnover problem.

In order to counter this, Covivio Hotels is implementing appropriate strategies to improve working conditions. In addition, the hotels operated by WiZiU are not greatly exposed to seasonal fluctuations, because they are located in major European cities, which are not subject to significant variations.

Turnover of permanent departures was 33% for all hotel operating properties held by assets held by Covivio Hotels and 34.1% for WiZiU.

#### **3.3.1.1.2 Ensure skills development**

##### **3.3.1.1.2.a A training policy to support the strategy**

Covivio Hotels attaches great importance to the training and development of its employees, considering that the quality of the service offered to its customers is based on the skills and well-being of its staff. The development of soft skills to complement vocational training is becoming more and more embedded in the skills development strategy at the European level each year. Each hotel draws up its annual training plan, based on multi-year priority areas.

Covivio Hotels' training policy aims to create an environment which is conducive to continued learning and career development, while meeting the specific requirements of the hotel sector. Its training strategy focuses on several main training themes:

- customer service: reception and communication techniques, complaint management and customer satisfaction;
- management and leadership: team management, development of leadership skills;

- technical: use of hotel management software, maintenance and security of facilities;
- catering: table service techniques, hygiene and food safety;
- personal development: stress management, development of interpersonal skills.

Annual meetings are held at Group level at Covivio Hotels' head office with each business manager, in order to identify any developments that could impact the business and require training programmes to enable employees to improve their skills. The People Reviews conducted for each business line also enable multi-annual training priorities to be defined. Individual needs are then identified as closely as possible to the front line at annual interviews, based on the established catalogue, and are then honed individually through discussions and observations by local staff and managers.

0.9% of WiZiU's total payroll was dedicated to training in 2024.

The average training time is 9 hours/employee.

### Rollout of training courses in hotels

Hotels are buildings frequented by the public and as such are subject to specific technical regulations. A number of specific courses are compulsory for employees. These training courses are almost exclusively concerned with the safety of customers and employees within the establishment (operating licence, reception of persons with reduced mobility, fire safety, occupational first-aid (OFA), etc.). Site manager, employee or technical staff, everyone receives appropriate training.

Over the last two years, the training strategy in the hotels managed today by WiZiU has mainly focused on mandatory training to ensure compliance and development of operational teams. In addition, in order to meet the contracts established with the brands, employees of the hotel operating properties must also complete the e-learning training courses set up by the various brands.

The training rate was 93% in 2024 for all employees of Covivio Hotels operating properties (82% for WiZiU).

### 3.3.1.2.b Integrated and dynamic career management

#### Annual interviews

Annual interviews are held in the majority of Covivio Hotels establishments. These assessments aim to provide a clear and detailed framework for discussing:

- annual performance appraisal;
- the employer's objectives and expectations;
- future prospects and development for the employee;
- employee satisfaction and feelings.

These annual reviews enable Covivio Hotels to support the career development of its employees, improve overall performance and strengthen the satisfaction and retention of talent within the Company.

In 2024, WiZiU implemented a new annual assessment process using a digital platform. The discussions are divided into two parts:

- the first focuses on behavioural skills such as collaboration, customer focus and organization;
- the second part deals with specific objectives: three for employees and five for managers. Each employee has three interviews per year.

At WiZiU: 96.5% of employees benefited from an annual performance review with their manager in 2024

People Reviews are organised every year for the teams at Covivio Hotels' head office. These are cross-functional meetings that provide an opportunity to take stock of the "talent pool" for a position, the challenges of retention, development and recruitment, according to the changes in the position, the company's objectives and the associated job market. In 2023, a People Review of young French talents under the age of 30 was carried out to take stock of their skills development and identify opportunities for each of them. A feedback report was made to the employees in the presence of the employee's direct manager and a member of the relevant Management Committee. A new event is scheduled for 2025. On an individual level, the annual interview between each employee and their manager, as well as the interviews conducted by the Human Resources Department, are at the heart of the career management and support system for each employee. 100% of employees on permanent contracts are eligible for this interview, and only an employee's absence or arrival at the end of the year is justification for postponing the interview.

#### Career interviews

In 2024, WiZiU's HR department oversaw the roll-out of a new process for career interviews in its hotels, aimed at making their organisation and follow-up more reliable. Thus, from 2025, interviews will be digitalised and a link will be made with the training plans defined within each establishment, in line with their needs.

In France, unlike the annual individual interview, which is not mandatory, a career interview is compulsory at least every two years. Discussions on their career development have been held since 2019 for the employees at Covivio Hotels head office during a specific interview, known as a "career development interview", which is held at least every two years. It is an opportunity for a fruitful discussion between manager and employee about the employee's expectations. The managers are trained to conduct this interview, which requires a different approach to the end-of-year interview, requiring a "manager coach" approach. This career interview may be followed by an HR interview to assess the feasibility of a possible project and set up the necessary support (skills assessment, personal training account, professional transition, professional development advice, coaching, job training, etc.). The expression of a short-term (1 year) or medium-term (3 years) mobility project as part of this interview systematically triggers an exploratory interview with the HR team and the search for paths for short-term development internally. Covivio's Universal Registration Document has a diagram which presents the career management system for head office employees.



### 3.3.1.1.3 Retaining talents

#### 3.3.1.1.3.a Promoting work-life balance

Employees at Covivio Hotels' head office are covered by the Group's Quality of Life at Work (QLW) agreement. Signed for the first time in 2014, renewed in 2018, it was revised in 2023. The agreement, which was signed in 2023, covers all measures aimed at promoting a work-life balance, introduces the concept of the right to disconnect and covers the psychosocial risks associated with the use of new information and communication technologies (NICT). WiZiU employees can also work remotely when their position allows it.

This QLW agreement also addresses practices that contribute to improving the quality of work and working conditions, such as the quality of the managerial relationship and manager training, workstation ergonomics, work organisation, internal communication, or the clarity of each person's missions.

- For more information: ESRS S1, section 3.3.1.1.3.a of Covivio's Universal Registration Document.

Maternity leave in France is 16 weeks and can be supplemented by 14 days of pathological leave before the birth, with full pay. Paternity leave has been 28 days since 1 July 2021, with 100% of the salary maintained during the period of the leave. In addition, parental leave allows the parents of a child under the age of 3 to work part-time until the child is 3 years old, or to suspend their full-time employment contract for the period they choose (100% of parents who make this choice return to their job at the end of their parental leave). If a parent wishes to continue working part-time after their child has reached the age of three, they can request this; all such requests have been accepted by Covivio.

WiZiU is going to roll out new initiatives in France from 2025:

- 75% coverage of the employer's share of the mutual insurance premium;
- introduction of a long-service and loyalty bonus (WiZtrust);
- introduction of a co-opting bonus for recruitment (WiZconnect);
- individual increases (in addition to those agreed collectively);
- consideration for each employee on their birthday;
- lifting of the one-year seniority requirement for guaranteed public holidays and 'sick child' days;
- entitlement to 2.5 days of paid sick leave (the legal entitlement is 2);

#### 3.3.1.1.3.b Remunerating performance and addressing inflation

Based on the principles of fair pay and talent retention, employees receive remuneration that takes both individual and collective results into account, as well as the employee's profile and level of experience, and the increasingly competitive job market.

A rewards and incentives programme is organised in hotels for support staff and sales teams. The programme is based on the establishment's performance (EBITDA, etc.) and customer satisfaction, which is measured using various tools (questionnaires, online ratings, etc.)

At the corporate level, an agreement is negotiated annually with the trade union representatives on salaries as part of the Mandatory Annual Negotiations (MAN). These negotiations cover the matters laid down by law: mainly remuneration and the distribution of added value, working hours, gender equality in the workplace, quality of life at work.

At WiZiU, the human resources department is in the process of harmonising practices and equal pay internally.

#### 3.3.1.1.4 Ensure health and safety and promote quality of life at work

Covivio Hotels is committed to ensuring that its various managers comply with the eight conventions of the International Labour Organization (ILO): freedom of association, the right to collective bargaining, the elimination of all forms of forced or compulsory labour, the abolition of child labour, and the elimination of discrimination in respect of employment, remuneration and occupation.

The work-related accidents recorded each year mainly involve incidents on the commute to and from work and a number of workplace injuries. The majority of accidents involve incorrect movements, falls and cuts, and a few burns. These incidents are usually related to the physical nature of the work in the hospitality industry.

The single occupational risk assessment document (DUERP) is updated every year. It enables health and safety risks to be identified, particularly psychosocial risks, movements and positions, etc., and, if appropriate, results in the introduction of corrective action plans.

The modernisation and refurbishment of the buildings also provides an opportunity to improve working conditions. For example, the renovation of staff rest rooms and the use (in Germany) of height-adjustable desks to prevent or reduce back pain, thus contributing to a more ergonomic and comfortable working environment.



#### Technology to improve working conditions: bed lifters at the Ibis Styles Gare Beffroi de Lille

The 140 rooms in this hotel were equipped with bed lifters in this hotel in 2023. This innovation reduces the physical demands on hotel maids. They can make the beds at the height that suits them, no more bending down. It is also easier to vacuum. This deployment has improved daily life and has reduced pain related to working positions.

The absenteeism rate is 6.6% for all hotel operating properties in 2024.

The workplace accident rate is 11.6% for 2024.

The prevention of electrical risk is also taken into account, with the implementation of H0-B0 authorizations<sup>(1)</sup> for all Covivio employees faced with this type of risk in Real Estate Engineering and Information Systems. The Single Occupational Risk Assessment Document (DUERP) was reviewed in 2024 with the elected members of the SEC, and includes all potential health and safety risks for Covivio employees and service providers. It is shared with the Occupational Health Service and is reviewed every year to include any new risks.

The safety rules and equipment on construction sites are defined in the procedures according to the legal standards in force. They are subject to regular training and awareness-raising actions. Travel is governed by a travel policy specific to each country. In 2024, no accident resulted in a disability and no deaths were reported.

### 3.3.1.2 Deployment of the Human Rights policy among employees (S1-1 EU Law)

In addition to the laws and regulations that apply in each country in which it operates, and conscious of the impact that its activities may have, Covivio Hotels is fully committed to respecting and promoting internationally recognised human rights within its businesses and throughout its chain of stakeholders. The Covivio Group is a signatory of the Global Compact and applies its 10 Principles as well as the Eight Fundamental Conventions of the International Labour Organization. Furthermore, Covivio is based in countries with highly protective laws in this area. Human Rights are therefore a significant issue for Covivio Hotels when carrying out its activities, as the double materiality study (ESRS 2, section 3.1.2.4.2) shows. In addition, Covivio has an active policy of philanthropy and skills sponsorship through its corporate foundation (ESRS S3, section 3.3.3.2.1).

The Covivio Group formalised its Human Rights policy in 2024. This policy represents a global commitment by the Group as an employer, customer and supplier of services.

Internally: it applies to employees and non-employees with a direct or indirect employment contract with the Group (section 3.3.1.1), in the different countries in which it operates, where Human Rights are subject to highly protective legislation, which Covivio endeavours to surpass.

Externally: Covivio is aware of its role and responsibility at the heart of its value chain and attaches great importance to human rights in its relationships with different stakeholders. This is reflected in its activities, particularly with its suppliers.

Although certain subjects are handled locally (recruitment, negotiation of collective agreements, etc.) taking national practices and legislation into account, many other topics involving objectives and values shared across the Group are implemented in a comparable way in the countries where the Group is present. Diversity, social dialogue, personal development, quality of life at work, work-life balance and prevention of all forms of discrimination are all common objectives that underpin Covivio's HR policy. This policy is disseminated to all employees at the Group's head offices.

Covivio Hotels implements the Group's Human Rights Policy in its directly managed hotels and recognises the importance of Human Rights in its operations. The Company is committed to guaranteeing fair and equitable working conditions for all its employees by providing them with decent wages, reasonable working hours and a safe and healthy working environment. Covivio Hotels also ensures that all forms of discrimination are eliminated, whether on the basis of race, gender, sexual orientation or any other personal characteristic.

Employees are given training to raise their awareness of human rights issues and alert them to signs that may indicate human trafficking. Several partner brand retailers deploy Human Rights policies. Some institutions, such as the RBL in Germany, carry out awareness-raising as soon as a new employee is onboarded.

#### 3.3.1.2.1 Commitment to employees

##### Ethical Charter

The WiZiU Ethical Charter is handed to each new employee when they are recruited. It is accompanied by an educational video. It is also available on the Human Resources Information System dashboard. It is the Ethical Charters of the brands concerned that apply to the other assets held as operating properties.

It is the Group's Ethical Charter that applies to employees at Covivio Hotels head office (ESRS G1, section 3.4.2.2 of Covivio's Universal Registration Document).

##### Remedies if Human Rights are infringed

WiZiU has set up a whistleblowing system. This internal system is only intended for WiZiU employees. It has a dedicated email address. This system guarantees the protection of whistleblowers, in accordance with the provisions of the Sapin 2 law. It complements other existing communication channels.

(1) H0 B0 electrical certification covers all activities carried out in an electrical room as well as all electrical work carried out in a professional context.

The Group's whistleblowing system is available to its employees and all stakeholders. If a member of staff, whether an employee or non-employee, becomes aware of a human rights violation, either against themselves or another employee, they can report the matter using the whistleblowing procedure. Disseminated and presented internally Europe-wide, Covivio's partners and suppliers are also informed of it via the company's website. It is also mentioned in the Responsible Purchasing Charter (ESRS S2, section 3.3.2.2.1). This, in particular, allows the confidentiality of whistleblowers to be more effectively managed.

- For more information: ESRS G1, section: 3.4.2.4.

### 3.3.1.2.2 A Human Rights policy aligned with the United Nations Guiding Principles on Business and Human Rights

Each of Covivio's entities applies the eight conventions of the International Labour Organization (ILO): Freedom of association and the right to collective bargaining, elimination of all forms of forced or compulsory labour, abolition of child labour and elimination of discrimination in respect of employment, remuneration and occupation.

Covivio's Human Rights Policy specifies that certain commitments apply more specifically to its directly managed hotels, such as the fight against human trafficking and sexual exploitation. On this point, Covivio condemns and prohibits any form of human trafficking, sexual exploitation or paedophilia in the hotels under its direct management.

WiZiU has chosen to go a step further by developing its own Ethical Charter to complement the Group's, in order to strengthen the provisions relating to the hotel business. Each hotel manager is responsible for ensuring that the Ethical Charter is properly understood and applied.

- For more information on the WiZiU Ethical Charter: ESRS G1, section 3.4.2.2.

### 3.3.1.2.3 Prevention of workplace accidents

Details of Covivio's policy to prevent workplace accidents are given in section 3.3.1.4.

The Covivio Group has set itself the target of zero cases of occupational illness or workplace accidents among its employees.

### 3.3.1.2.4 Committing to diversity and equality

#### Diversity partnerships

Diversity is considered an essential asset at Covivio. Partnerships have been created with associations dedicated to the promotion of diversity and inclusion in order to realise this goal. These partnerships reflect the commitment by Covivio and its subsidiaries to building a fairer and more inclusive world. In Germany, partnerships have been set up with several associations such as:

- Pink Pillow Berlin Collection: this initiative comprises LGBTQ+ friendly hotels in Berlin. It seeks to offer an inclusive and warm welcome to all visitors, while actively supporting the local community;

- Frauenkulture e. V.: a socio-cultural centre in Leipzig that promotes equality, democracy and tolerance through artistic and cultural projects, workshops, and events, while providing a meeting place and support for women and girls;
- Orange day. The "No Violence Against Women" Orange Days: an annual global campaign of 16 consecutive days to raise awareness and mobilise action to stop violence against women and girls.

Covivio is also committed to combating all forms of discrimination at Group level and has introduced measures covering all direct employees in its activities in Europe. The scope of discrimination covered by these measures are: age, sex, gender identity, name, origin, family situation, sexual orientation, morals, genetic characteristics, real or supposed membership of an ethnic group, nation or race, language spoken, physical appearance, disability, state of health, state of pregnancy, political opinions, philosophical opinions, religious convictions, trade union activities, bank account domiciliation, place of residence, particular vulnerability linked to economic circumstances, and loss of autonomy.

Covivio Hotels' management analyses the recruitment process, from the monitoring job applications to invitations to job interviews, to ensure that a diverse range of profiles are considered for each position. All recruitment processes must include at least one candidate from each gender, and the recruiter's guide for HR recruiters and managers, emphasises the principles of non-discrimination in hiring as well as the relevant regulations. Recruiters in the French HR Department undergo training every three years on combating discrimination in recruitment, and an e-learning module is distributed to all recruitment managers.

#### Gender equality

Covivio signed the Diversity Charter<sup>(1)</sup> in 2010 and the Global Compact<sup>(2)</sup> in 2011. Its HR policy is consistent with the objectives of these agreements. A systematic analysis of pay gaps inside the same business line is periodically carried out.

WiZiU implemented an agreement on gender equality in 2024. Measures have been adopted to increase the number of women in strategic positions in the Company. Their number is increasing due to the recruitments made in 2024. This impetus was given with the drafting of a standardised interview guide for management positions at head office. Hotels will be trained in how to use this tool in 2025.

- Breakdown of the workforce of Covivio Hotels' hotel operating properties on 31 December 2024 (EPRA Diversity-Emp):
  - 49% women and 51% men within WiZiU;
  - 53% women and 47% men among the other managers.
- The gender balance in the managerial population of Covivio Hotels' operating properties on 31 December 2024:
  - 31% of the managers at WiZiU are women and 69% are men;
  - 48% of managers are women and 52% are men among the other managers.

(1) Principles of the charter: [https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/combating-discrimination/tackling-discrimination/diversity-and-inclusion-initiatives/diversity-charters-eu-country\\_en](https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/combating-discrimination/tackling-discrimination/diversity-and-inclusion-initiatives/diversity-charters-eu-country_en)

(2) Covivio | UN Global Compact

### Ex-Aequo to promote equal opportunities between men and women

The Covivio Group's Universal Registration Document describes the system for supporting the progression of women with direct employment contracts within the Group. Since 2017, the Ex-Aequo programme consists of two main components:

- actions to raise awareness among all employees about gender equality through surveys and information meetings;
- a mentoring programme designed to support and guide women who wish to receive guidance on their professional career and benefit from the support of a mentor who is a member of the European Management team. 24 French, Italian and German women are benefiting from this programme today.

The whistleblowing system in place also covers harassment and discrimination of all kinds, whilst protecting whistleblowers. In 2024, no complaint related to discrimination issues was filed with the Ethics Officer, and no conviction was pronounced against Covivio Hotels. No alert was made in 2024 within the hotels managed by WiZiU.

In France, a dual sexual harassment referent has also been appointed at corporate level (one within the Social and Economic Committee, the other within the Human Resources Department) under the 2017 Labour Law. It enables the number of possible alert and intervention channels to be increased. An e-learning module on preventing sexist behaviour is available on the Covivio Academy platform. Its aim is to help employees and managers identify sexist behaviour and its various manifestations at work, and to react accordingly when necessary.

### Disability

If skills are equal, the Covivio Group will favour disabled candidates. The Covivio Group launched its first disability programme in 2021. This initiative culminated in 2023 in the signing of a partnership with the National Association for Managing the Vocational Integration of Disabled People<sup>(1)</sup> (Agefip), with the support of the Social and Economic Committee.

In order to continue the awareness-raising work which has been done since 2021, a number of very hands-on actions were taken at corporate level in 2024: creation of a page dedicated to the Disability Mission on the intranet, and the provision of varied resources; organisation of conferences on mental health and the reconciliation of chronic illness and work; information on the RQTH (recognition of the status of disabled worker), particularly during recruitment and onboarding; organisation of disability sports activities during the SEEPH (Week for the Employment of Disabled Persons); organisation of a Christmas market.

An agreement was negotiated on disability for the period 2023-2025, for the scope under WiZiU's management. This agreement aims to improve the way disabilities are considered in the recruitment process and job retention, as well as diversity and inclusion. The employment rate of disabled people in hotels had risen from 1.1% to 2.2% by the end of 2024, after it was

implemented. Training sessions are organised for HR and hotel managers, as well as workshops for managers. Awareness sessions are also rolled out for all employees. These awareness-raising initiatives help to improve understanding, support and communication of the disability policy. Lastly, partnerships are established with specialised websites, ergonomists are solicited and partnerships are set up with associations such as the Arpejeh<sup>(2)</sup>. For example, these partnerships enable hotel visits to be organised for disabled students.

#### Measures to accommodate employees with disabilities: the example of the Park Inn Leuven (Belgium)

- Equal Employment Opportunities: All employment practices, including recruitment, promotion and remuneration, are exempt from any discrimination based on disability.
- Specific adaptations: provision of the necessary adaptations to enable disabled employees to perform their job tasks calmly and effectively. These adjustments include changes to the working environment, flexible working hours and assistive technologies.
- Accessibility: The facilities are designed to be accessible to disabled people, including the entrances, toilets and work areas.
- Training and development: Adaptation of training programmes to encourage disabled employees to develop their skills and to progress in their career.
- Support & Resources: Access to resources such as employee assistance programmes, counselling and support groups.

### Senior staff

With regard to supporting senior staff in employment, Covivio has set up at corporate level, a systematic interview with the Human Resources Department for employees during the year they reach 55. This interview is repeated every year for employees who request it, and includes a review of the job, and any desired changes desired and actions to be implemented, in terms of ergonomics, for example. In 2024, all senior staff were invited to this interview and 15% chose to attend (senior staff generally wish to have this interview every two or three years rather than every year). In addition, Covivio allows employees over 55 to work part-time with pension contributions maintained on a full-time basis. Seven employees benefited from this scheme in 2024, i.e. 12% of the senior workforce. An agreement concerning senior staff, aimed at helping older employees to stay in work and preserving their working conditions, was signed in 2020. A Senior Staff Time Savings Account (CET) for employees aged 55 and over enables senior staff to plan their retirement. Training is also offered to employees who are approaching retirement age to prepare them for this life stage from an administrative and psychological point of view.

<sup>(1)</sup> Agefip has been supporting employment and job retention of people with disabilities in private sector companies since 1987. Its main activities include advising and supporting companies in defining and implementing their disability policies, and providing financial assistance to companies and individuals to help compensate for disability in the workplace.

<sup>(2)</sup> Arpejeh: support and services organisation for disabled people in Paris.

### 3.3.1.3 Social dialogue (S1-2)

#### 3.3.1.3.1 Organisation of social dialogue with employee representatives

Collective agreements are negotiated with the union representatives: in 2024, the employees of the Group's French head office are represented by two trade unions (CFE-CGC and CFDT). In 2024, there were few new major collective agreements signed: in addition to the agreements already concluded in previous years (and still in force) on Quality of Life at Work, Profit-Sharing and the savings plan, Equality and Diversity, and Seniors, the following were added in 2024: an agreement on the payment of a Value Sharing bonus, an agreement aimed at increasing on-call duty pay, and the updating of agreements concerning the coverage of employees' health expenses and welfare benefits. Staff representatives are responsible for any individual questions and issues. All elected representatives are "protected" under labour law, including after the end of their term of office, and can only be subject to individual sanctions with the authorisation of the State and under a specific procedure. They have a great deal of freedom of speech and time set aside for their duties as elected representatives. The openness and transparency on which this social dialogue is based means that Covivio is attentive to the suggestions of employee representatives and can work with them to anticipate the changing needs and aspirations of its employees.

Employees of hotel operating properties are covered by the HCR (hotel, café, restaurant) sector agreement. WiZiU has signed several agreements (disability, profit-sharing, quality of life at work, gender equality and working time) that apply in the majority of the hotels it operates.

Covivio Hotels or its managers have not been prosecuted or convicted in 2024 in relation to labour law or trade union freedom.

#### 3.3.1.3.2 Dialogue methods and their uses (S1-3)

Covivio and its subsidiaries maintain a permanent dialogue with the staff representative bodies (IRP), in a transparent and constructive manner. The Staff Representative Bodies play a fundamental role in representing and defending the interests of employees, and act as a link between employees and management, ensuring that the concerns and needs of workers are heard and taken into account. IRPs are involved in negotiating working conditions, workplace safety and remuneration policies. They also ensure that employees' rights are respected, particularly with regard to termination of employment, restructuring and working conditions. By acting as mediators when requested by employees, the IRP contribute to maintaining a peaceful social climate and to fostering constructive dialogue between the various stakeholders in the company. Within this virtuous framework, Covivio is committed to promoting social dialogue and trade union freedom. All employees are free to join the professional union of their choice, and trade unions are free to develop in accordance with the provisions of the French Labour Code. Covivio undertakes not to discriminate against any employee belonging to a trade union, especially regarding recruitment, the conduct and organisation of work, job training, promotion, pay and the granting of social benefits, disciplinary action and the termination of employment contracts.

In France, collective agreements are negotiated with union representatives (3.3.1.3.1). It enables weak signals to be heard and identified so that "negative effects on own workers can be remedied", according to the definition of this ESRS. The whistleblowing channels are described in France in the QLW agreement and at Group level in the Ethical Charter. If an employee is in difficulties as due to their work at Covivio, a system allows the person concerned, or witnesses within the company, to pass on the information so that an appropriate solution can be found.

For hotels operated by WiZiU, Social and Economic Committee meetings are held every two months for establishments with more than 50 employees and once a month for those with less than 50 employees. Meetings of the SEC may be more frequent, depending on needs.

#### Requirement for additional CSRD data

<b>S1-3 – Q33</b>	<b>Assessment of employees' knowledge of whistleblowing processes.</b>	The procedure for monitoring and processing alerts received by Covivio via the Whistleblowing platform is explained in ESRS G1, section 3.4.2.4. No alerts were received in 2023 and 2024.
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## Preventing risks of corruption

Covivio Hotels has had an internal whistleblowing system since 2015. Its functioning has been modified to take the provisions of the Sapin 2 law into account. The whistleblowing system covers multiple scenarios: crimes or offences, serious and obvious violations of national or international legislation, serious threats or harm to the public interest. It also enables all employees to report violations of the principles set out in the Ethical Charter, and in the following areas in general: finance, accounting, banking, anti-corruption, anti-discrimination and anti-harassment at work. The whistleblowing system is available to Group employees and all stakeholders.

WiZiU has set up an internal whistleblowing system (3.3.1.2.1). Intended solely for its employees, the system guarantees the protection of whistleblowers, in accordance with the provisions of the Sapin 2 law.

### 3.3.1.4 Deployment of the social policy (S1-4)

#### 3.3.1.4.1 HR governance in the consolidation phase

Each local manager has their own Human Resources team, in order to offer a service that is as close as possible to the operational teams' requirements for all their social issues. The goal is to standardise practices in hotel operating properties, especially in terms of employer branding and integration, management training and development, gender equality in the workplace, quality of life at work, remuneration and social dialogue.

#### 3.3.1.4.2 Measuring employee commitment

Covivio has conducted an employee satisfaction survey every two years since 2019: the Commitment Barometer, carried out among all European employees by the Kantar institute. The 2023 survey, with an attendance rate of 83%, bears witness to the feeling of belonging, the confidence and the quality of the working conditions for everyone.

Team commitment and pride in belonging are present: 93% of employees say that their work is interesting, and 85% of them are satisfied with their job, *i.e.* 12 points higher than the Kantar Institute's benchmark for private companies. Confidence in the Group's strategy and management remain at high levels: 78% of employees say they have confidence in the management team (+15 pts compared to the benchmark) and 83% in their direct line manager. 94% of employees say they are optimistic about Covivio's future. The organisational efficiency within the Group is singled out for praise in this survey: 81% of employees state that decisions are taken quickly and 80% are pleased with the speed at which they are implemented. The quality of life at work is also highly praised: 90% consider that the working atmosphere is good within their team and 80% say that they have a good work-life balance. 91% of employees are satisfied with their material working conditions.

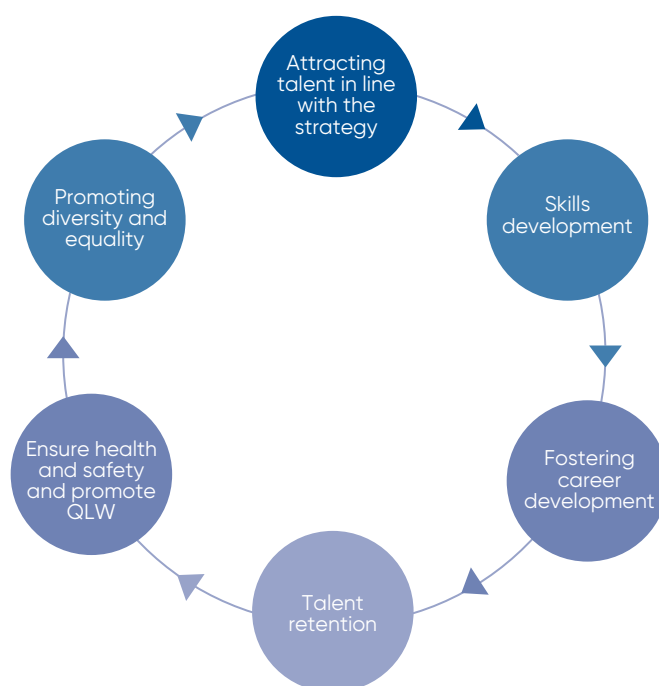
The results of each barometer are presented to the Executive Committee and to the CSR Committee. Any corrective measures that are identified result in an action plan for each country, which is monitored at Group level by the General Management.

WiZiU included the creation of a questionnaire for employees of hotels in operation in its 2026 roadmap.

#### 3.3.1.4.3 HR action plan

The 2020/2025/2030 CSR action plan for the different activities of Covivio Hotels is presented in ESRS 2 in section 3.1.2.5. This action plan details the main multi-year objectives and their progress. These objectives are the subject of internal reporting and are monitored at the different levels of the company's governance.

The diagram below shows the HR action plan for Covivio Hotels' direct employees.



## HR action plan

### 3.3.1.4.4 The resources mobilised to implement the action plan

**Ensure health and safety and promote quality of life at work:** the CSSCT<sup>(1)</sup> checks that the facilities offered to employees are suitable and comfortable, and is updated on all development projects and provisional schedules for possible works.

**A recruitment policy that supports the strategy:** recruitment needs are studied and assessed by the General Management, according to the multi-annual business priorities and challenges. The mid-year and end-of-year interviews, as well as the People Reviews, serve to measure the workload of the teams, the density of skills required and their allocation over time, as well as any changes in skills that may have to be taken into account.

**A policy of attracting and employing young talent in a context of increasing turnover:** the HR teams have also organised meetings with students in order to develop the employer brand.

**Integrated and dynamic career management:** a People Review was carried out in 2023 to assess the development of their skills and identify opportunities for each of them. Feedback was provided to the employees concerned. The People Review will be repeated in 2025.

HR employees In FTE (Full Time Equivalent)	Corporate	WiziU
Number of employees in charge of payroll	2	0.5
Number of employees in charge of diversity	0.2	0.2

### 3.3.1.5 Social policy metrics and targets (S1-5)

#### 3.3.1.5.1 Table of social indicators (S1-6)

Information on the workforce reported by age group

		Covivio Hotels
		2024
Non-employee workforce	<b>Number of non-employees</b>	<b>324</b>
	<b>Interns</b>	<b>36</b>
	Men	16
	Women	20
	<b>Non-guaranteed hours contracts</b>	<b>118</b>
	Men	58
	Women	60
	<b>Temporary employees</b>	<b>167</b>
	Men	86
	Women	81
	<b>Executive Directors</b>	<b>3</b>

(1) CSSCT: Health, Safety and Working Conditions Commission: Commission created within the Social and Economic Committee (CSE).



	GRI Standards / EPRA	WiziU		Other Hotel managers	Covivio Hotels		Coverage rate
		2023	2024	2024	2024	%	
Total workforce reported by gender		Number of employees (including vocational training certificate (CAPs))	583	583	986	1,569	
		Men	306	297	463	760	48%
		Women	277	286	524	810	52%
		Permanent contract	516	525	627	1,152	73%
		Men	282	278	297	575	50%
		Women	234	247	330	577	50%
Total workforce by type of employment contract reported by gender		Temporary contracts	34	23	117	140	9%
		Men	13	8	61	69	49%
		Women	21	15	56	71	51%
		Minijobs (Germany)	0	0	84	84	5%
		Men	0	0	38	38	45%
		Women	0	0	46	46	55%
		CAP (vocational training certificate)	33	35	158	193	12%
		Men	11	11	66	77	40%
		Women	22	24	92	116	60%
		France	508	508	0	508	32%
		Men	271	262	0	262	52%
		Women	237	246	0	246	48%
Total workforce reported by geographical area	Diversity- Emp  102-8	Belgium	75	75	139	214	14%
		Men	35	35	84	119	56%
		Women	40	40	56	96	45%
		Germany	-	-	750	750	48%
		Men	-	-	333	333	44%
		Women	-	-	417	417	56%
		Ireland	-	-	97	97	6%
		Men	-	-	46	46	47%
		Women	-	-	51	51	53%
		Full time	537	536	758	1,294	82%
		Men	296	284	381	665	51%
		Women	241	252	377	629	49%
Total workforce by type of job reported by gender		Part-time	46	47	228	275	18%
		Men	10	13	91	104	38%
		Women	36	34	137	171	62%
		Manager	76	70	124	194	12%
		Men	49	48	64	112	58%
		Women	27	22	60	82	42%
Total workforce by type of professional category reported by gender		Non Manager	507	513	862	1,375	88%
		Men	259	249	417	666	48%
		Women	248	264	445	709	52%
		Less than 30	203	202	408	610	39%
		30 to 50 years	261	257	360	617	39%
		over 50	119	124	221	345	22%



	GRI Standards / EPRA	WiZiU		Other Hotel managers	Covivio Hotels		Coverage rate	
		2023	2024	2024	2024	%		
Staff turnover reported by gender, employment contract and age group	Emp-Turnover	Total departures	-	266	274	540	0%	100%
		of which temporary contracts	-	33.8%	-	160	30%	100%
		Turnover on permanent + temporary contracts	-	34.1%	-	-	33%	100%
		Permanent contract turnover	-	45.6%	-	-	34%	100%
		Men	-	150	-	285	28%	100%
		Women	-	116	-	255	25%	100%
		Less than 30	-	149	-	287	28%	100%
		30 to 50 years	-	92	-	200	19%	100%
		over 50	-	25	-	53	5%	100%
Reported recruitment rate by gender, employment contract and age group	401-1	Total arrivals	-	270	295	565	0%	100%
		of which temporary contracts	-	33.0%	-	283	50%	100%
		Permanent contract recruitment rate	-	35.1%			24%	100%
		Permanent contract + temporary contract recruitment rate	-	53.1%			36%	100%
		Men	-	152		297	29%	100%
		Women	-	118		268	26%	100%
		Less than 30	-	166		344	33%	100%
		30 to 50 years	-	79		169	16%	100%
		over 50	-	25		52	5%	100%

#### Metrics related to training and skills development

	GRI Standards / EPRA		WiZiU	Covivio Hotels (incl. WiZiU)	
			2024	2024	Rate of coverage
% of staff who received training		Total	419	1,456	100%
		Training rate	82%	93%	100%
		Men	222	706	100%
		Women	197	748	100%
Average number of training hours per employee by gender and by professional category	Emp-Training 404-1	Total training hours per employee	8.9	17.4	83%
		Men	9.5	16.9	83%
		Women	8.2	17.8	83%
		Managers	10.8	11.8	83%
		Non Managers	8.9	22.3	83%
% of payroll dedicated to training		Total	0.9%	0.6%	71%
Percentage of employees receiving an annual performance and development review by gender	Emp-Dev 404-3	Total	96.5%	77.4%	100%
		Men	96.8%	79%	100%
		Women	96.3%	76%	100%

## Accident-related metrics

		GRI Standards / EPRA	WIZIU	Covivio Hotels (including WIZIU)	
			2024	2024	Rate of coverage
Reported absenteeism rate by gender		Total	8.3%	6.6%	100%
		Men	9.9%	6.7%	100%
		Women	6.7%	6.2%	100%
Rate of occupational illnesses reported by gender	H & S-Emp	Total	0.4%	0.2%	100%
		Men	0%	0%	100%
		Women	1%	0.3%	100%
Workplace accident rate by gender	403-2	Total	15.9%	11.6%	100%
		Men	14.3%	10.4%	100%
		Women	17.7%	12.8%	100%
		Frequency rate	60.17	-	-
		Severity rate	2.52	-	-
		Number of deaths	0	0	100%

## Salary information

	GRI Standards / EPRA		Covivio Hotels (including WIZIU)	
			2024	Coverage rate
Ratio of basic salary and remuneration of women to men, by professional category	Diversity-Pay 405-2	Average M/F ratio (excluding CAP and suspension)	-6%	100%
		Median M/F ratio (excluding CAP and suspension)	-7%	53%
		M/F manager ratio	-8%	96%
		Non-manager M/F ratio	-7%	96%
Equity ratio		Equity ratio - Average	0.54	53%
		Equity ratio - Median	0.51	53%

## Other indicators

	GRI Standards / EPRA		WIZIU	Covivio Hotels (including WIZIU)	
			2024	2024	Coverage rate
% of employees covered by a collective agreement	102-41		100%	89.0%	95.2%
% of employees covered by employee representatives			100%	82.4%	89.2%
Percentage of the total workforce represented on joint Management-Employee Health and Safety at Work Committees to monitor and advise on the Workplace First Aid programme	403-1	Total	100%	67.1%	100%
Percentage of activities in compliance with recognised health and safety management system principles		Total	0%	0%	52.2%
Disabled employees	Covivio indicator	Total	2.2%	1.3%	100%
Complaints on ethics-related topics (including harassment, discrimination in all its forms)			0	1	1
Amount of fines for ethical reasons or discrimination			0	0	94%

As of 31 December 2024, Covivio Hotels had 19 full-time employees (8 women, 11 men), 18 of whom were on permanent contracts. All of the Human Resources indicators relating to Covivio Hotels are included in Chapter 3.3 of the Covivio Universal Registration Document as part of the France ESU. Within this scope, the training rate in 2024 was 94%, with an average of 12 hours training per employee and 3% of the payroll was earmarked for training. In addition, 100% of employees are covered by collective agreements and a Health and Safety Committee. The workplace accident rate for the ESU is 1%, whilst the absenteeism rate is 2.8%. Finally, the turnover of departures was 10.9% and the recruitment rate 8.8% at the end of 2024 due to the dynamism of the labour market.

### Major reorganisation operation with AccorInvest

At the beginning of December 2024, Covivio Hotels and AccorInvest announced the finalisation of the operation to consolidate the ownership of the operating properties of their hotels. Of the 43 hotels concerned, 14 are directly managed by the Covivio Hotels operational platform: WiZiU. Of these 43 business assets, 19 are accounted for under the equity method.

As the migration of HR data did not begin until December (when the operation was finalised), only the main data are available for this report:

- 613 employees: 56% women, 44% men;
- 91% permanent contracts, 4% temporary contracts, 5% apprenticeship, <1% trainees

As the integration of employees by the various entities taking over the management of human resources related to the hotels in this portfolio was still in progress at the end of the fiscal year, these employees are not included in the social reporting tables.

#### 3.3.1.5.2 Adequate wage (S1-10)

An adequate wage does not correspond to the legal minimum wage in each country. An adequate wage can be defined as the remuneration that allows the employee and his/her family to cover their basic needs (food, housing, health care, clothing), but also education, transport, leisure, and which offers the possibility to save.

All Covivio Hotels employees receive an adequate wage. Covivio Hotels, through its social policy, endeavours to determine a fair wage based on the economic context and its need to be attractive.

For example, the average remuneration of WiZiU employees in France is €29,711 in 2024 (€29,125 in 2023). The company uses a salary scale that is consistent with industry practices. Salaries are governed by the HCR branch agreement, but WiZiU strives to ensure an adequate salary for each employee.

#### 3.3.1.5.3 Employee health and unemployment coverage (S1-11)

All employees of the managers of Covivio Hotels are covered by social protection, as part of public programmes or benefits offered by the company, against loss of income due to illness, disability, work accidents, unemployment, maternity and parental leave as well as retirement.

In France, WiZiU employees benefit from an additional health cover (mutual) financed by the company of 75% for non-managers and 100% for managers, and their salary is maintained from the first day of absence for sick leave, for three months.

#### 3.3.1.5.4 Work-life balance (leave) (S1-15)

100% of employees (WiZiU, corporate, other managers) can take leave for family reasons.

Employees are entitled to days of leave for specific family events, such as marriage, the birth of a child, or the death of a relative. The period of leave may vary depending on the event and national legislation. This applies to 100% of the employee and non-employee workforce.

This leave enables employees to take the time they need to manage important events in their personal lives, without loss of pay. This information is available on the intranet and in the documents provided during the onboarding process, and is granted on presentation of supporting documents without any other request for authorisation.

#### 3.3.1.5.5 Incidents/complaints related to work and Human Rights among own staff (S1-17)

	Number in 2023	Number in 2024	Observations
The total number of incidents of discrimination, including harassment, reported during the reporting period	1	1	
The number of complaints lodged through the channels enabling company employees to express their concerns (including the grievance mechanisms) and, where applicable, with the national contact points for multinational companies of the OECD	1	1	
Total amount of fines, penalties and material compensation resulting from the above-mentioned incidents and complaints, as well as a reconciliation of these financial amounts with the most relevant amount presented in the financial agreement	0	0	

In 2024, Covivio Hotels received no reports of serious human rights incidents related to its workforce. Furthermore, there were no fines, penalties or compensation to be paid in the 2024 fiscal year.

#### 3.3.1.5.6 Additional data requirement (S1-16)

(S1-6)	<b>Methods and assumptions used to compile the data</b>	The definition of the scope of the indicators and the methodology used to consolidate them is indicated in the reporting protocol for social indicators. This can be consulted directly on Covivio's website.
(S1-7)	<b>Non-employee workforce</b>	Explanations of the scopes, methods and assumptions used to compile the HR data are available in Covivio's social reporting protocol, directly accessible on its website.
(S1-8)	<b>Overall percentage of employees covered at hotel level by workers' representatives</b>	In hotel lease properties: Covivio Hotels does not deal with staff and staff representation is managed by the operator In hotels held as operating properties: 100% At Covivio Hotels head office: 100%
(S1-8)	<b>Employee representation agreement by a European Works Council (EWC)</b>	Due to its legal structure, Covivio Hotels does not have a European Works Council (EWC). The same applies to WiZiU, for the same reason.
(S1-9)	<b>Breakdown of top management/senior executives by gender</b>	The breakdown by gender is presented in the table of social indicators, Covivio Hotels steering committee is composed of 40% women
(S1-14)	<b>Employee health and safety coverage</b>	<b>ESU Covivio France</b> (including Covivio Hotels employees): 100% <b>WiZiU scope</b> : 100%

## 3.3.2 Working conditions and respect for Human Rights in the value chain (ESRS S2)

Having a responsible supply chain is key for the Group and is a significant challenge. The performance of Covivio and its buildings depends on the performance of its suppliers, consultants and subcontractors.

The objective of the ESRS S2 standard is to present the way in which Covivio Hotels influences and interacts with workers within its value chain. This concerns all workers who are not included in the scope of its own workforce, for whom the information is provided in the dedicated section (ESRS S1).

### 3.3.2.1 Impacts, Risks and Opportunities related to workers in the value chain (S2.SBM-3)

#### 3.3.2.1.1 Scope of value chain workers

Covivio has identified the main types of work in its value chain, in order to define the scope covered and the materiality of the issue. This analysis was enriched by the mapping of CSR risks related to purchases made in 2020 (see focus below). Two main groups are identified:

- **upstream:** the workers concerned are primarily the employees of suppliers involved in the construction or renovation of hotels (staff of construction companies, suppliers, other parties involved: engineers, architects, technicians, workers, etc.);
- **downstream:** workers in leased or operated hotels:
  - for operating properties: staff of maintenance companies (elevators, cleaning, etc.), security, laundry, transport and logistics companies, as well as event management companies and IT service providers for hotel management systems;

- for leased properties: the employees of the tenant companies that operate the hotel.

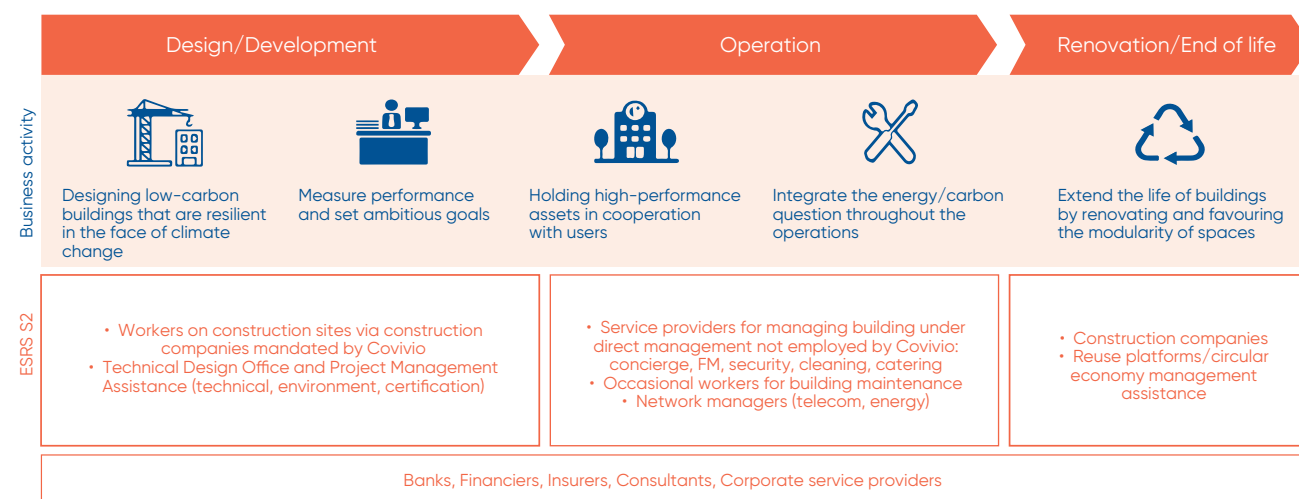
This also includes consultants and auditors involved in managing the assets. The personnel of buyers and investors are not included in this scope.

There are therefore higher impacts and risks associated with these two groups because:

- there are greater Health & Safety and Human Rights risks associated with the types of jobs included in these groups, particularly in the construction and hospitality sectors;
- the work is performed on a site owned by Covivio, although the contractual liability remains with the employers (the companies that Covivio contracts with to perform the work or services in question).

The rating of the IROs on this ESRS was therefore based on these elements.

#### Workers in the value chain



Other workers in the value chain have been identified with challenges that appear less material for the Group, mainly given that the other business lines are located more off the Covivio site. These include:

- suppliers of materials and producers of raw materials;
- manufacturers of energy technologies;

- manufacturers of electronic components;
- furniture manufacturers and equipment wholesalers.

The Group's influence is more limited in this case, but these services are nevertheless covered by the Responsible Purchasing policy. The same applies to workers of companies that work with Covivio in its corporate sphere, for the legal, communications/events, HR and finance departments, etc. The Responsible Purchasing policy is presented in section 3.3.2.1.

### Mapping of CSR risks related to the value chain

A study was conducted in 2020 to determine the main CSR risks of Covivio's supplier panel. Indeed, if they were poorly managed, purchases, or even a supplier chain, could have negative impacts in terms of reputation and activity for Covivio, as well as for its stakeholders: **customers, partners, investors, local communities, the suppliers themselves**, etc.

#### Methodology

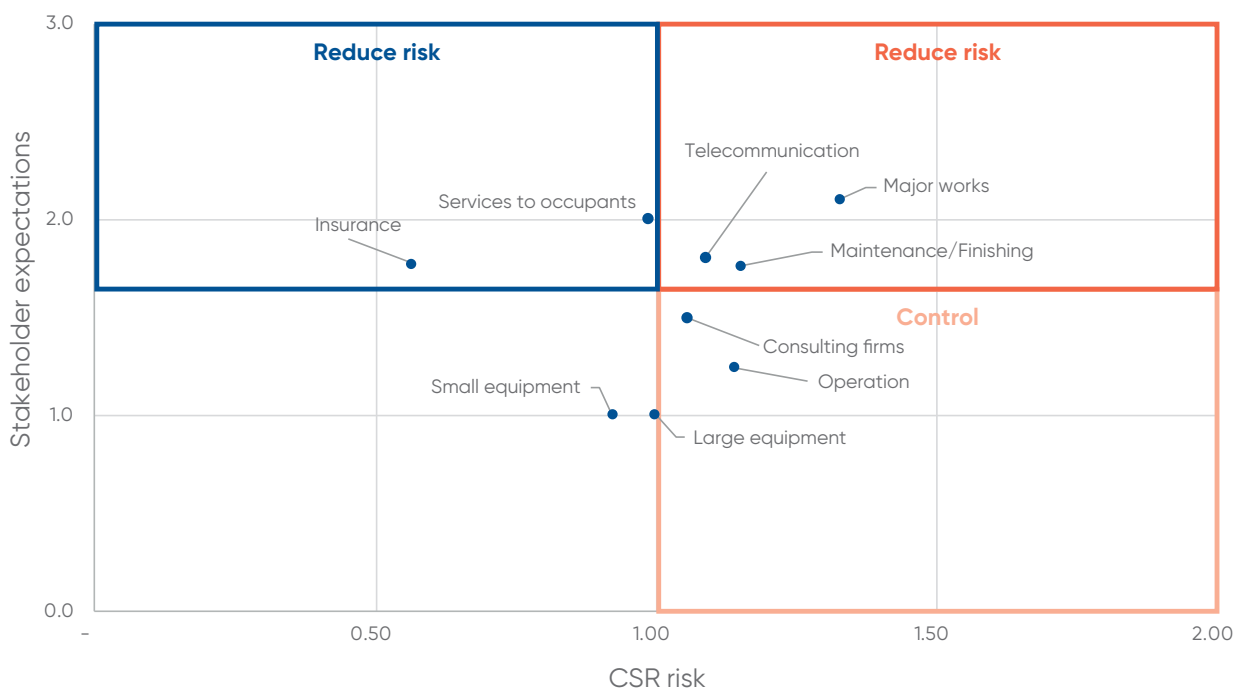
Several purchasing categories were determined in each of the three countries, based on the expenditure for 2019: nine in France, seven in Italy and six in Germany. The categories which are common to each country are: telecommunications, maintenance, design/consulting offices, major works and insurance. The Small equipment, Major equipment purchase categories are specific to France, whilst Services to Occupiers and Operating Expenses are specific to France and Italy. Two separate analyses were carried out for each of these categories:

- an analysis of the context of the purchase category: risk of disruption to the supply chain, availability of alternatives, possibility of influence from suppliers, media exposure, stakeholders' main expectations, etc.
- an analysis of the main categories of CSR risks:
  - environmental: energy consumption, CO<sub>2</sub> emissions, biodiversity, pollution, etc.;
  - social: health/safety, quality of life at work, respect for Human Rights, etc.;
  - customers: well-being, data security, etc.;
  - ethics: corruption, money laundering, etc.;
  - regional: nuisances for local residents, economic development, etc.

The risks analysed are the residual risks that remain after the implementation of specific actions and measures. The contributors interviewed had to quantify these different risks on a scale ranging from non-existent to critical, and including limited, significant and major, based on their experience as buyers. This study produced the following results: in France, overall perceived CSR risks are limited because they are managed internally. The environmental risk is the most significant overall. The Social and Customer risks should also not be overlooked, respectively on the major works and Engineering-Design/Consulting category. In Germany, risks related to business ethics are perceived as the most important, whilst in Italy, it is the risks related to local development. The results therefore differ from one country to another.

The graph below ranks the purchasing categories studied according to their respective levels of CSR risk (the average of each of the risks mentioned above), cross-referencing each one against the expectations of stakeholders. The higher the point on the right of the graph, the more significant the expectations and risks. The greater the expectations of the stakeholders, the greater the final risk to be managed, as this will not only affect Covivio, but also its ecosystem. The Major Works and Maintenance purchasing categories are identified as the most at risk in terms of CSR and are where stakeholders' expectations are greatest. The risks are mainly environmental (waste, pollution) and social (including health and safety of people). Ethical risks were also raised, as well as risks that could impact tenants' activities (such as those related to on-site maintenance, for example). These categories may give rise to specific actions. The other categories identified as having risks that need to be reduced are Insurance and Consulting.

**Prioritisation matrix/CSR risks and stakeholder expectations**



### 3.3.2.1.2 Fight against forced labour and child labour

Covivio's operations are conducted in countries with high levels of social protection that ban forced labour and child labour. None of these countries is considered to be at risk as defined by Ethifinance's classification as part of its Gaia rating system<sup>(1)</sup>. Covivio restates these principles and its commitment to complying with international conventions in this area in its publications, especially in its Responsible Purchasing Charter.

- For more information on the Human Rights policy: section 3.3.2.2.2.

Covivio is strengthening its procurement policy on the subjects of material traceability, where the risk of child or forced labour is higher, in order to prevent this risk throughout the value chain.

In addition, Covivio utilises the 360° monitoring system for its main suppliers, which is part of the Responsible Purchasing programme implemented with EcoVadis (section 3.3.2.2.1). This monitoring enables Covivio to be informed of suppliers' news, for example if a dispute related to forced labour arose at a supplier.

### 3.3.2.1.3 Identification of IROs related to workers in the value chain

The dual materiality analysis conducted in 2023/2024 led to the identification of current or potential impacts and risks concerning these categories of workers.

ESRS S2 - WORKING CONDITIONS AND RESPECT FOR HUMAN RIGHTS IN THE VALUE CHAIN	
<b>Description and key words</b>	Well-being at work/Quality of life at work Respect for social dialogue Accidents and health/safety at work Training
<b>Main impacts</b>	Maximum impact on the well-being and health/safety of employees working on construction sites and sites in operation Impact on significant reporting needs; coordination on construction sites Impact on Human Rights, in particular with certain insecure jobs (part-time, temporary contracts, temporary work)
<b>Positioning in the value chain</b>	Upstream, direct and downstream operations
<b>Main risks</b>	<b>Work-related risk:</b> Limited criminal risk, as criminal liability lies with the constructor, but a reputational risk exists if diligence is deemed insufficient Risk to business continuity related to recruitment difficulties in the construction sector <b>Risk linked to operating hotels:</b> Reputational risk Criminal risk in case of discrimination or Human Rights violations
<b>Main opportunities</b>	Contribution to developing local employment (cf. socio-economic impact study ESRS S3) Trust-based relationship with suppliers Brand appeal, reputation
<b>Materiality</b>	Material

The policies implemented to manage these negative impacts are detailed below. Covivio has also set up an accident monitoring system on its construction sites to record the frequency of this impact on workers on its construction sites (section 3.3.2.5.2).

Some workers' trades may be considered to present more risks than others: roofing, façade work, working at height, electrical work, demolition, etc. The contracts that Covivio signs with construction companies govern the safety conditions of personnel working on construction sites, regardless of their size. In addition, building sites are supervised to guarantee maximum safety for persons. For example, in France the HSC (Health and Safety coordinator) is responsible for preventing occupational risks associated with several self-employed workers or companies (including subcontractors) working simultaneously or successively during a project's design and construction phases. The Health and Safety Coordinator plans the use of shared resources during the planning phase of a project (infrastructure, logistical resources and collective protection). The coordinator

ensures that the necessary safety measures are taken during the construction and operation phases of the project<sup>(2)</sup>.

The Covid-19 health crisis has shown that projects can be stopped overnight in the event of a pandemic. Construction sites may also be disrupted by natural hazards (exceptional rainfall, frost, heatwaves, etc.), as well as supply difficulties (raw materials, equipment, etc.). Furthermore, Covivio is not aware of any risks or opportunities arising from the impacts on and dependencies regarding workers in the value chain that impact specific groups.

#### The specific case of reverse management contracts

Five hotels in the Covivio Hotels operating portfolio are operated under reverse management contracts: the workforce reports directly to the managers and not to Covivio Hotels. The impacts, risks and opportunities associated with this category of workforce are reported in the ESRS S1 of Covivio Hotels, and the expected policy and action plan levels are also the same.

<sup>(1)</sup> Ethifinance classification as part of its Gaia rating.

<sup>(2)</sup> Definition of CSPS: AFNOR Competence - <https://competences.afnor.org/metiers/coordonnateur-sps-niv-1-2-3>

## Main quantitative indicators:

	2024
Own workers	552
M/F	48% men and 52% women
Percentage of permanent contracts	86%
Training rate	96%

### 3.3.2.2 Policies to manage the material challenges of workers in the value chain (S2-1)

#### 3.3.2.2.1 Responsible Purchasing Policy

Having a responsible supply chain is key for the Group and is a significant issue, both in terms of impact on Covivio's business continuity and in terms of reputation. The performance of Covivio Hotels and its buildings depends on that of its suppliers, consultants and subcontractors, particularly in terms of carbon and climate transition.

Since 2011, Covivio has adopted a Responsible Purchasing Policy, enabling it to:

- raise awareness among buyers about Responsible Procurement;
- apply a principle of reciprocity to its suppliers, thus committing to respect the principles set out in this charter;
- encourage consultants and suppliers to be assessed with regard to CSR criteria during calls for tenders, as well as when signing new contracts via EcoVadis assessment;
- work with suppliers to promote sustainable development, through working groups, in coordination with associations, or through shared R&D work;
- conduct integrity and reputation checks, reserving the right to terminate any business relationship with suppliers whose behaviour is found to be unethical.

#### Scope of the Responsible Purchasing Policy and its governance

Covivio's Responsible Purchasing policy covers suppliers and consultants involved in operational activities (hotel development, renovation) as well as corporate activities (support) at Covivio Hotels' head office.

It is organised and supervised by Covivio's sustainable development department. The progress of this deployment is presented each year to the CSR Committee, which ensures that the objectives are met.

Covivio's Responsible Purchasing policy is based in particular on its Responsible Purchasing charter of the same name, which expressly refers to several international initiatives. It requires reciprocity from signatory suppliers with regards to the respect of Human Rights in their own value chains. By signing the charter, Covivio's suppliers undertake to control and monitor their value chain on these issues.

In 2024, the Responsible Purchasing scheme was extended to cover the scope of corporate expenditure, with the first stage concerning expenditure by the HR, Communications and Legal departments.

As a subsidiary, Covivio Hotels receives support from the Group's support services and its policies. Regarding the purchasing policy, deployment differs according to the type of asset.

**For leased hotels:** Covivio Hotels do not interfere in the purchasing policy of its tenants and operators. Nevertheless, its tenants are increasingly committed to Responsible Purchasing. For example, hotels operating under the Accor brand benefit from the chain's central purchasing service. This service analyse only lists suppliers that respond positively to their sustainability requirements.

**For hotel operating properties run by WiZiU:** Covivio Hotels has adopted a Responsible Purchasing policy in addition to the Group's policy. It details the Company's commitments related to the specific activities of hotel operations:

- promoting responsible food: sustainable (MSC - Marine Stewardship Council) or seasonal fishing, a menu free of products from endangered species (meat, fish and shellfish products), favouring seasonal fruits and vegetables, a minimum quota of products from organic farming, fair trade and/or local distribution channels, prioritising the sourcing of ingredients in order to favour "homemade" dishes, offering at least one vegetarian dish on the menu;
- favouring products and equipment from sustainably managed sectors: purchase low-energy consumption equipment, favour FSC <sup>(1)</sup> or PEFC <sup>(2)</sup> certified furniture, buy paper items (office and hygiene) sourced from sustainably managed forests, favour products with eco-responsible compositions (ecological cleaning products).

For hotel operating properties outside WiZiU, the management contracts include the requirement to have Responsible Purchasing Policy.

#### Deployment of the Responsible Purchasing Policy

Covivio's Responsible Purchasing Policy is deployed using three tools (the Responsible Purchasing Charter, the EcoVadis questionnaire and the CSR clause; section 3.3.2.5.1 presents these tools in detail) and allows a number of requirements to be met:

- obligations such as those resulting from the law of 9 December 2016, known as "Sapin 2", on transparency, the fight against corruption and the modernization of economic life;
- commitments such as respecting the principles of social responsibility defined in the United Nations Global Compact and including them into the purchasing process;
- provisions stipulated for certifications such as Green Key or BREEAM In Use.

(1) Forest Stewardship Council: sustainable forestry label.

(2) Programme for the Endorsement of Forest Certification: forest certification attests to the sustainable management of the forest.



Covivio's Responsible Purchasing Charter sets out the suppliers' commitments regarding Human Rights:

- Principle 1: "The supplier or consultant in question undertakes to initiate a suitable and structured CSR policy, in particular by implementing an environmental and social management system that is consistent with the environmental, social and societal requirements of this Charter."
- Principle 9: "The supplier undertakes to promote diversity by firmly condemning all forms of discrimination (age, origin, gender, disability, etc.) as defined in Article 225-1 of the French Criminal Code and according to the criteria of the Diversity Charter which Covivio is a signatory of. The supplier is particularly encouraged to use the sheltered and protected sector for its subcontracting contracts."
- Principle 10: "The supplier undertakes to comply with current labour regulations, in particular the eight Fundamental Conventions of the ILO relating to fair remuneration, non-discrimination (age, origin, gender, disability, etc.) and forced labour, and to comply with the provisions of Article 32 of the Charter of Fundamental Rights of the European Union on the prohibition of child labour and the protection of young people at work. The supplier also undertakes to guarantee the right of association and trade unionism to its employees."
- Principle 11: "The supplier undertakes to respect and promote the rights and freedoms enshrined in the Universal Declaration of Human Rights as well as the Ten Principles of the United Nations Global Compact."

### 3.3.2.2.2 Human Rights Policy

In 2024, Covivio adopted a Human Rights policy, which applies to its own employees as well as to workers in the value chain, in which the company undertakes to recognise and adhere to the following fundamental principles:

- **the International Bill of Human Rights;**
- **the Organization for Economic Co-operation and Development (OECD) Guidelines** for Multinational Enterprises on Responsible Business Conduct;
- **UN Guiding Principles on Business and Human Rights;**
- **the Declaration on Fundamental Principles and Rights at Work and the eight Fundamental Conventions of the International Labour Organization (ILO):** freedom of association, recognition of the right to collective bargaining, elimination of all forms of forced or compulsory labour, effective abolition of child labour and elimination of discrimination in respect of employment, pay and occupation;
- **the ten principles of the Global Compact**, which Covivio has been a signatory of since 2011;
- **the 17 UN Sustainable Development Goals** for 2030;
- **the Diversity Charter**, which Covivio has been a signatory of since 2010.

Covivio is notably committed to treating its stakeholders fairly.

Covivio has not received any reports of non-compliance during the course of its activities with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights work or the OECD Guidelines for Multinational Enterprises involving value chain workers.

In addition, Covivio has an Ethical Charter which lays down a set of principles and rules applicable to the Group and which also serves as a Code of Conduct within the meaning of Law No. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life, known as the 'Sapin 2 Law'. Stakeholders (suppliers, partners, customers, etc.) and anyone with whom Covivio works in general, are asked to comply with the principles set out in this charter.

The assets held as hotel operating properties are operated under different brands. Although they share the same high ethical standards, these standards are applied through the charters and procedures that are specific to each of these brands. The international hotel group partners of Covivio Hotels publish their ethical policies on their websites.

### 3.3.2.2.3 General approach in terms of commitment, communication and remedial actions concerning the policies implemented

Covivio strives to provide the most transparent communication possible on Human Rights issues. At the end of 2024, Covivio published its Human Rights policy in a document available on its website. Its Ethical Charter is accessible there.

#### Deployment of the Human Rights Policy

Covivio uses a range of tools to monitor and assess the commitment by its suppliers and consultants to respecting Human Rights. To reinforce this approach, from 2025, works contracts shall gradually include specific human rights clauses: *"The Project Owner expects the Company to comply with the terms of the European Directive of 24 April 2024 on corporate duty of care with regard to sustainability, pending its transposition into national law. The Company therefore undertakes to do what is necessary to remedy any negative impact on human rights and the environment, whether actual or potential, with regard to its own activities, the activities of its subsidiaries and the operations carried out by its commercial partners in its chains of operations. To this end, the Company acknowledges its responsibility to exercise duty of care with regard to human rights by identifying, preventing and mitigating the adverse human rights impacts that its activities may have, and by reporting on how it remedies these impacts. The Company shall avoid infringing human rights and remedy any negative impact on human rights that it may have caused, contributed to or been linked to through its own activities and those of its subsidiaries and through its direct and indirect business relationships."*

Specific clauses are also included in the Responsible Purchasing Charter. The assessment conducted by EcoVadis also enables the commitment of suppliers to be verified, with human rights having a significant weighting in this assessment.

Covivio Hotels will set up a Purchasing Department for the WiZiU scope from 2025. Dialogue with suppliers will be reinforced to increase their awareness of Covivio's CSR and ethics issues.

#### Measures to prevent or remedy Human Rights impacts

Preventive measures are implemented with Covivio's partners who work on its construction sites to ensure that Human Rights are protected. Accident monitoring is used for all operations that Covivio is developing or restructuring. This is managed by the HSW (Health and Safety at Work) coordinator and published in the coordinator's Annual Report on Sustainable Performance. In addition, an SHP (safety and health protection) coordinator is appointed for each construction site, who conducts a weekly inspection to check working conditions. The coordinator writes a report of his or her findings at the end of the inspection, which the company is obliged to follow.

Covivio requires its partners to supply a declaration of subcontractors and a list of foreign workers, together with proof that they are legally entitled to work for each project. BTP cards (professional card for the building and public works sector) are therefore systematically checked on each site.

Works contracts and day-to-day management contracts include a clause in which the supplier undertakes to sign Covivio's Responsible Purchasing Charter and to respect its principles, relating to ethics, respect for human rights and labour rights, etc.

Purchasing policies, particularly with regard to food, cleaning products, laundry and textiles, remain strongly attached to the policies developed by each brand, each with a Responsible Purchasing policy shared with the operator. Some franchise contracts include an obligation to purchase exclusively through the brand's central purchasing service. The management of hotel operating properties in the context of the roll-out of WiZiU will gradually lead to a convergence of purchasing practices.

### 3.3.2.3 Dialogue process (S2-2)

#### Stakeholders commitment

The standard clause and the Responsible Purchasing Charter encourage suppliers (and therefore their employees) to make any suggestions to Covivio that could positively impact its carbon footprint, reduce energy or water consumption, or more broadly reduce its environmental footprint or intensify its societal actions.

Engagement with workers in the value chain is carried out by the legal representatives of the companies employing them.

The dialogue with suppliers for construction and renovation activities takes the form of meetings, visits to prominent buildings, etc. There is no quantifiable follow-up (statistics or other) for these exchanges with suppliers, due to the very large number of suppliers and managers.

Concerning the operation of hotel operating properties, there is continuous dialogue between the management of each hotel and the representatives of the companies involved in the value chain (laundry, cleaning, security, transport, etc.). There are regular meetings to discuss compliance with commitments and to adapt services to changes in the business. In addition, a number of hotel operators use newsletters to strengthen the sharing of CSR issues by reminding suppliers of their environmental commitments.

Covivio does not give direct orders or instructions to employees (workers, technicians, engineers) on its construction sites. Nevertheless, as the contracting authority, its contracts indicate the level of commitment it expects from its suppliers in relation to their employees. The measures Covivio takes on its construction sites are detailed in section 3.3.2.2.3.

Requirements concerning marginalised or vulnerable workers are, notably, set out in the low-nuisance construction site charters. For example: "If foreign minorities are working on the site, the signs, notices and booklets are published in the languages of these minorities".

The delegation of powers makes the supplier responsible for ensuring strict compliance with all regulations on health and safety and the prohibition of undocumented labour, in an effective and permanent manner, as is required of the Project Owner. It is therefore the supplier who is personally liable for the strict compliance with these obligations.

### 3.3.2.4 Whistleblowing system (S2-3)

There is a whistleblowing system available to all Covivio employees and their stakeholders to report actual or potential incidents concerning:

- any fraud, corruption or influence peddling;
- any case of discrimination or mental or sexual harassment;
- any act involving a danger to the life or health of an employee;
- any act contrary to Covivio's Ethical Charter.

The alert can relate to information concerning events that have occurred or are highly likely to occur. Covivio employees can report incidents which they have direct or indirect knowledge of. This action must be made in good faith and for no direct financial gain. The system is public: it is on Covivio's website: link Covivio whistleblowing procedure (ESRS G1 - section 3.4.2.4)

Covivio has yet to set up a mechanism for assessing the needs or concerns of stakeholders. For instance, Covivio has not conducted a survey on the level of confidence that its suppliers' workers in the value chain have in the whistleblowing system. However, Covivio's teams are in constant contact with supplier's representatives regarding construction work and real estate management, as well as with the managers responsible for the operation of hotels. This enables them to identify weak signals and areas for improving the working conditions of suppliers' employees.

### 3.3.2.5 Actions and objectives (S2-4)

Covivio conducts a 360° watch on the reputational risks of its suppliers, particularly in terms of integrity and ethical standards.

#### 3.3.2.5.1 Action plan

In 2011, Covivio was one of the first European real estate companies to set up a system for assessing suppliers and consultants. This notably covered the Company's operating expenditure within its corporate scope (head offices).

This in-house system was based on an internal charter signed by the supplier, a clause enabling the contractualisation of the suppliers' CSR commitment in the contracts and specifications of maintenance and works contracts. A survey questionnaire was also introduced, as well as a verification by an independent third party, of the questionnaire responses from a number of respondents each year.

Some brands such as Accor have a central purchasing service that analyses potential suppliers according to CSR criteria. Hotels operating under management contracts with hotel operators are contractually obligated to use their purchasing services. An incentive is provided for franchise agreements.

The Group has decided to enlist the expertise of an independent third party, EcoVadis, since 2022 to gradually extend the scope of the assessments to its subsidiaries, in particular Covivio Hotels. This system enables suppliers to be assessed using real-time information, centralised on a platform, sectoral benchmarks and the support of an international structure with 180 experts who have already assessed more than 100,000 companies worldwide.

#### A Responsible Purchasing policy, three tools

- Covivio's Responsible Purchasing Charter promotes the principles of the Global Compact, the Diversity Charter and the International Labor Organization, as well as the principles of Covivio's Ethical Charter. This charter aims to combat corruption and money laundering, anti-competitive practices and poor environmental (products used) or social (non-compliance with regulations) practices. Covivio's Responsible Purchasing Charter sets out its 11 CSR principles, notably with regard to the UN's 17 SDGs for 2030.
- The assessment of suppliers is performed using the EcoVadis platform, which covers 21 criteria based on the following four pillars: environment, social and Human Rights, ethics and responsible purchasing. This applies to orders of more than €200,000 excluding VAT for expenditure within the "real estate" scope (purchases of services, works, studies covering construction, renovation, facility or property management, etc.) and €50,000 excluding VAT for the "non-real estate" or "corporate" scopes (purchases made by support services and by Wellio). The following are excluded from the process: taxes, duties and fees, condominium managing companies and notaries. The analysis indicates the strengths and weaknesses of the rated suppliers, proposes areas for improvement in terms of CSR and also offers the possibility to follow training webinars on CSR topics.
- A clause enables the suppliers' CSR commitment to be contractualised in the contracts and specifications of maintenance and works contracts. An anti-corruption clause has also been included in the new contracts and specifications signed in France.

The results of the assessments reveal a correlation between the size of the companies and the scores obtained, due to different CSR maturity levels, but also to differences in financial and human resources. It shows that the larger the company, the more CSR issues are treated with maturity. Large companies formalise their policies to a greater extent and obtain more labels/certifications, while small companies act in a more informal manner. Overall, companies of all sizes take social issues, particularly quality of life at work, into account, but societal actions are less well addressed. There are also many disparities in environmental issues, even if certain unavoidable issues, such as waste management or the responsible supply chain, are taken into account.

At the end of 2024, after a third year of gradual deployment, EcoVadis assessed 232 French/German/Italian suppliers as well as 21 international (multinational) suppliers. The results are an average score of 64.2/100 for the 253 suppliers assessed, while the EcoVadis average is 47.6/100 (an increase on our average of 46/100 last year). The average of Covivio's suppliers for the construction activity is 62.7/100, well above EcoVadis's average for this sector (57.3). Covivio worked with 187 strategic suppliers in 2024 with revenues exceeding €200,000 (as an initial amount for calls for tenders and a rolling amount for other operations). Of the 187 strategic suppliers, 88 are rated by EcoVadis.

Overall, at the end of 2024, the expenses covered by EcoVadis' rating are:

- 50% for the corporate scope, which represents purchases related to support functions;
- 75% for tertiary and residential development expenses.

It should be noted that six of the ten largest suppliers of the development activity are rated by EcoVadis. These six companies represent 70% of development spending in 2024.

Lastly, 43% of operations-related purchases are covered by EcoVadis' rating. In short, 61% of expenditure in France are covered by the EcoVadis rating.

Beyond monitoring the indicators of the number of suppliers evaluated who are signatories of its Responsible Purchasing Charter, Covivio also receives CSR performance reports on its suppliers from the EcoVadis platform. These reports enable Covivio to measure the commitment of its suppliers and their progress.

EcoVadis gave Covivio the following information on its suppliers in 2024:

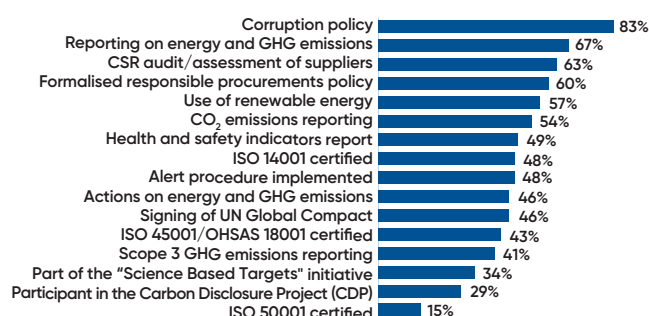
- 83% of the suppliers have formalised a policy on corruption (up 1% since 2023), 48% of them have set up a whistleblowing procedure, and nearly half report on health and safety indicators (up 35%).
- The number of suppliers using renewable energy increased by 50% (average of all sectors) attaining 57% of suppliers. However, it should be noted that the number of suppliers taking action on energy consumption and greenhouse gas emissions has fallen by 27%. Nevertheless, momentum remained strong for the construction sector, which grew by 19% for energy and GHG actions and by 31% for energy and GHG emissions reporting. The environmental risk, identified in the risk mapping, is now at the heart of the CSR actions of suppliers in the construction sector.



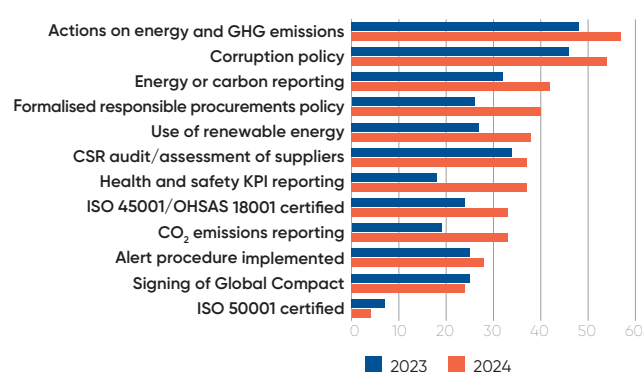
- 63% of Covivio's suppliers carry out audits or assessments of their suppliers' CSR issues to avoid any environmental and social risk.
- This commitment is strengthened with the increased standardisation of the Responsible Purchasing policy. 60% of Covivio suppliers assessed by EcoVadis have a standardised Responsible Purchasing Policy (58% for the construction sector). This represents an increase of 28% in one year.
- The proportion of suppliers that have signed the Global Compact has stabilised at 46%.

The platform developed by EcoVadis enables performance to be categorised by company, company size, geographical area and sector of activity. EcoVadis also monitors the continuous improvement of users (companies) by proposing corrective action plans, directly via the platform. A large number of reports can be generated and suppliers can access e-learning modules on a range of subjects (independently on the platform) as well as occasional webinars organised by EcoVadis.

#### Percentage of suppliers responding positively to these items in Ecovadis' questionnaire (selection of actions)



#### Focus on construction – Ecovadis responses



#### 3.3.2.5.2 Actions taken by Covivio to remedy the risks identified

The mapping of the risks connected to Covivio's suppliers (3.3.2.1.1) mainly identified CSR risks (waste, pollution, health and safety) and ethical risks.

Covivio does not give direct orders or instructions to employees (workers, technicians, engineers) on construction sites. Nevertheless, as the contracting authority, it makes recommendations to contractors and monitors accidents. Requirements concerning marginalised or vulnerable workers are, notably, set out in the low-nuisance construction site charters. For example, these stipulate that panels, notices and booklets must be published in the languages of the foreign minorities working on the site.

The delegation of powers gives full powers to the supplier to ensure, in an effective and permanent manner, that all the health and safety rules and the rules on combating illegal work that are incumbent on the project owner are strictly observed. It is therefore the supplier who is personally liable for the strict compliance with these obligations.

#### Accidents on construction sites

Covivio monitors accidents for all its development and restructuring operations in Europe. Covivio Hotels did not report any deaths among its suppliers and subcontractors in 2024.

Covivio Hotels does not give direct instructions to employees of suppliers of the managers of hotels. These managers are responsible for adapting their organisations to the expectations and needs of their employees. Likewise, if vulnerable communities are required to work in these establishments, the manager must ensure that health and safety rules are properly applied.

Nevertheless, the purchasing policies deployed within the hotels contribute to improving the improvement of working conditions. Particular attention is paid to the use of eco-responsible cleaning products (household, laundry, etc.). Besides having a lower impact on the environment, they reduce employees' exposure to chemical substances. The use of technological innovation is also encouraged to reduce the physical risks associated with certain tasks. An example of this are the bed lifts installed at the Ibis Styles Beffroi in Lille which is presented in ESRS S1 in section 3.3.1.4.

## Accidents at hotels operated under reverse management contracts

	2024
Scope of coverage	552 employees
Workplace accident rate	9.7%

### Ethical risk

The CSR risk mapping showed that the Ethical risk mainly concerns transactions. The Group has implemented mandatory tendering procedures to avoid the risk of corruption. This was the subject of a specific, in-house training programme for 100% of members of staff likely to be exposed to it.

Covivio Hotels was not convicted of any corruption or human rights violations in 2024. In addition, the monitoring of construction site accidents shows that the accident rate is lower than for the sector as a whole, and Covivio Hotels did not record any fatalities on its construction sites or in its hotels in operation.

Achieving zero accidents on construction sites is a key objective, shared with suppliers, who remain contractually liable for this.

### Material opportunities in relation to workers in the value chain

Covivio, through its activities, contributes to the development of the economy and supports local employment.

- For more information on the socio-economic impact study: ESRS S3, section 3.3.3.1.3.

The policies implemented also help to enhance the brand's appeal by helping to improve the trust-based relationship developed with the partners.

### Resources allocated to managing material impacts

Covivio has invested financially and in terms of human resources to implement these three tools. Thus, the annual cost of using the EcoVadis platform is shared by Covivio's different activities, and monitoring and running the system internally involves the work of three full-time equivalents divided among several Group employees. Suppliers pay a contribution to EcoVadis within the scope of their subscription for their assessment.

#### 3.3.2.6 Covivio objectives (S2-5)

Covivio does not involve the suppliers or workers in its value chain in the definition of its objectives. Each supplier is independent and responsible for how they manage the goal of "zero accidents on construction sites". Each uses its own internal safety plans, communication and awareness-raising tools according to the country's regulations and its area of specialisation.

In 2024, Covivio was once again recognised by the CDP (formerly the Carbon Disclosure Project) as a leader in terms of supplier engagement (CDP Supplier Engagement Leader A-List). Covivio also obtained a score of 74/100 in its sixth EcoVadis assessment, placing it among the top 6% of companies rated by this organisation and thus qualifying for the Silver level.

### 3.3.3 Affected communities (ESRS S3)

The ESRS S3 standard covers communities “affected” by the activities of the company and its value chain. The objective is to explain how the impacts and the dependencies of the company in relation to these communities can create risks and opportunities for Covivio Hotels. In order to do this, the identification and management of the material impacts on affected communities are presented in the following pages.

#### 3.3.3.1 Impacts, risks and opportunities related to affected communities (S3.SBM-3)

##### Scope

All affected communities that may be materially impacted by the company are included in the scope of ESRS S3. This includes:

- within the context of its building development and management operations, local residents, regions and their populations, local authorities and public bodies, with the purpose of successfully integrating the building into its environment, as well as social and economic dimensions;
- secondly, the communities that benefit from actions conducted by Covivio, in particular via its corporate foundation. It supports associations that work locally in a hands-on way to promote equal opportunities.

##### 3.3.3.1.1 Material impacts on affected communities

The dual materiality analysis confirmed that, in the context of its activities (in particular the development and renovation of buildings), the consequences of Covivio's activities on the communities have moderate material impacts. Thus, special care is taken in the context of each operation to reduce any inconvenience or nuisance that the construction site might cause to local residents. The analysis enabled the positive impacts on local communities to be identified, notably through the actions implemented and support of the Covivio Foundation.

The dual materiality analysis showed that the issue of the rights of indigenous populations is of very little material importance given the Group's activities and locations.

##### 3.3.3.1.2 Risk measurement in affected communities

Covivio has striven to measure its regional socio-economic impact in recent years. The assessment of the socio-economic footprint is a tool designed to improve the understanding of the broader impact of an activity and to identify possible ways of optimising the economic spin-offs of the company in the areas where it is located. The assessment of the socio-economic footprint is a tool intended to better understand the broader impact of an activity and to identify possible ways of optimizing the economic benefits of the company on the regions where it operates. This optimisation may involve, firstly, increasing the quantity of impacts (particularly the number of local jobs created) and, secondly, improving the quality of impacts (nature and type of jobs created, working conditions, etc.).

Covivio has identified two main levers that enable it to maximise the local impact of its activities, and on which it will increasingly rely:

- the “employment” lever: using local organisations that hire disabled people (sheltered and adapted sectors) or people who are marginalised from the job market (integration businesses);
- the “purchasing” lever: favouring local suppliers and subcontractors in the supply chain.

Numerous jobs are created by the renovation and construction of new buildings (see socio-economic study 2024 – section 3.3.3.1.3). In addition, the attractiveness of these buildings and the hotel or leisure activities they house have a significant impact on the vitality and economic activity of the areas where they are situated. This subject is included in “S3 – Societal involvement – sustainable cities”, in the double materiality analysis.

##### 3.3.3.1.3 Risks and opportunities for affected communities

The city of tomorrow will be low-carbon, connected and a player in the circular economy. To minimise travel and provide more friendly living spaces, buildings must be flexible, capable of evolving by integrating new technologies as well as challenges related to mixed uses, allowing city dwellers to use these open urban spaces to live, work and relax. By anticipating these changes, Covivio is able to manage the risks that could reduce its assets' attractiveness if the Group failed to prioritise its stakeholders, particularly in major cities. When conducting the mapping of CSR risks reference to the analysis of the ‘integration into the sustainable city’ double materiality matrix was identified as a major issue in relation to Covivio's activities in Europe.

Additional measures can be implemented for projects which are located in dense urban areas with many local residents, as well as a map of local stakeholders to identify potential partners or prioritise the use of local suppliers.



### ESRS S3 SOCIETAL INVOLVEMENT - INTEGRATION IN THE SUSTAINABLE CITY

<b>Description and key words</b>	Place and role of assets in the city, openness to the city, the district Access to the buildings
<b>Main impacts</b>	Impact mainly linked to the operation of hotels Positive impact linked to participation in the vitality of the local economy and the regeneration of districts
<b>Positioning in the value chain</b>	Downstream
<b>Main risks</b>	Risk to the activity's continuity: the integration into the local area and its ecosystem is necessary, particularly in the context of renovation projects. The commitment of local communities is a prerequisite for the success of a project. Risk of asset obsolescence in the event of poor accessibility (PRM and public transport) High reputational risk in addition to a risk of non-completion of the project
<b>Materiality</b>	Material

### ESRS S3 - RIGHT OF INDIGENOUS POPULATIONS

<b>Description and key words</b>	"The indigenous peoples have in common a historical continuity with a given territory before colonization and have a strong link with their land. They maintain, at least in part, distinct social, economic and political systems. They have distinct languages, cultures, beliefs and knowledge systems" UN definition <sup>(1)</sup>
<b>Main impacts</b>	The main impact is the non-respect by a supplier of the rights of indigenous populations
<b>Positioning in the value chain</b>	Upstream
<b>Main risks</b>	Reputational risk in the event of an incident with a supplier The hotel sector is considered to be particularly at risk in this respect. However, the risk is very limited for Covivio Hotels because the hotels it operates are located exclusively within the European Union.
<b>Materiality</b>	Non-material

(1) Indigenous Peoples | United Nations



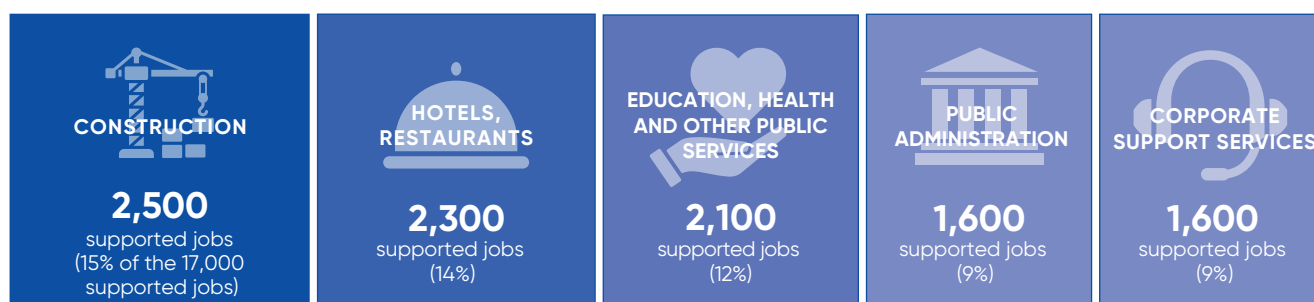
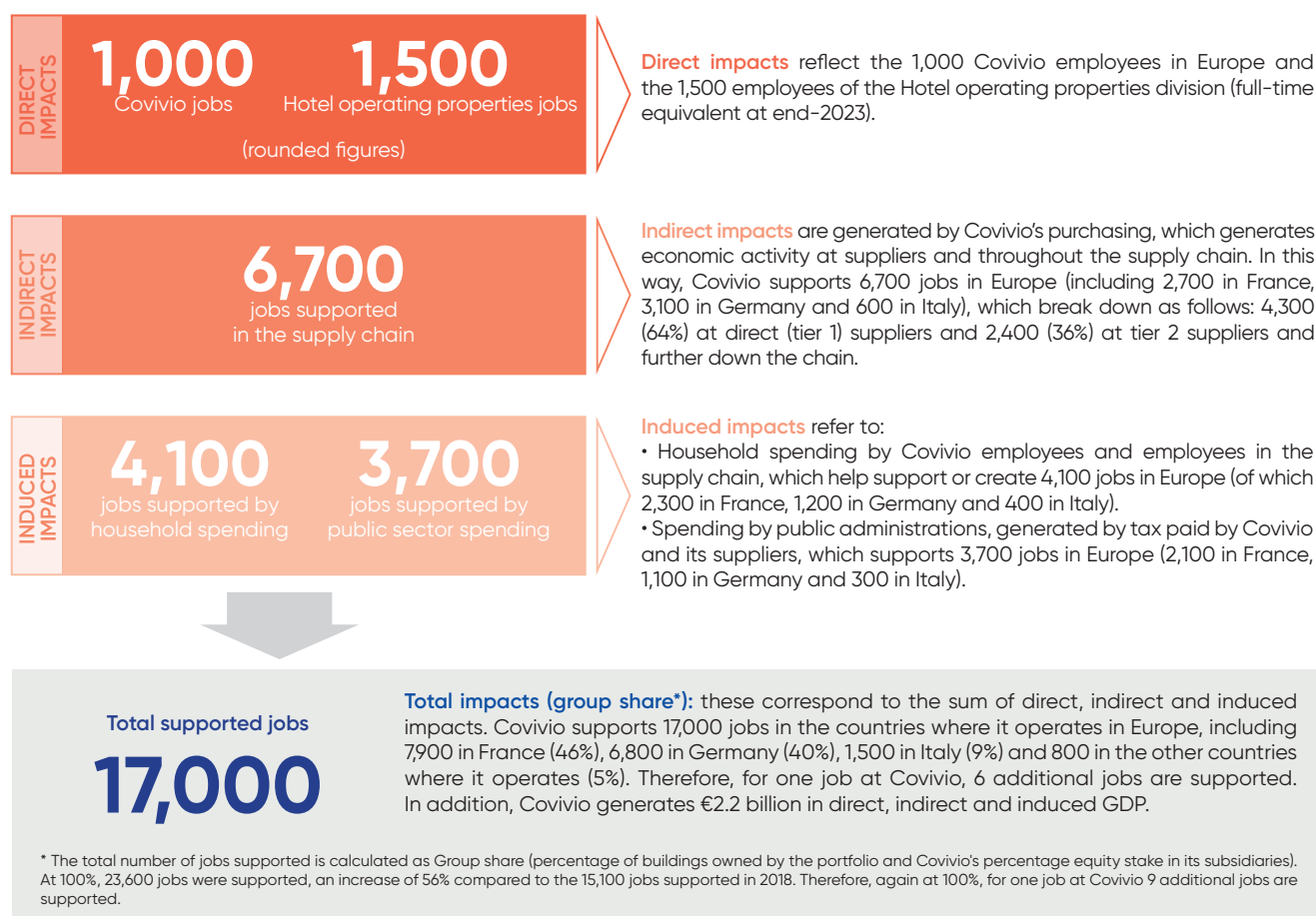
## Measuring the socio-economic impact of activities on a European scale

Covivio is aware of its economic weight and its territorial footprint in several major European cities, and since 2014 has striven to characterise and quantify the socio-economic benefits of its activities, within a scope that now extends across all the Group's activities in the countries where it operates in Europe. These studies are conducted with Utopies using the LOCAL FOOTPRINT® methodology.

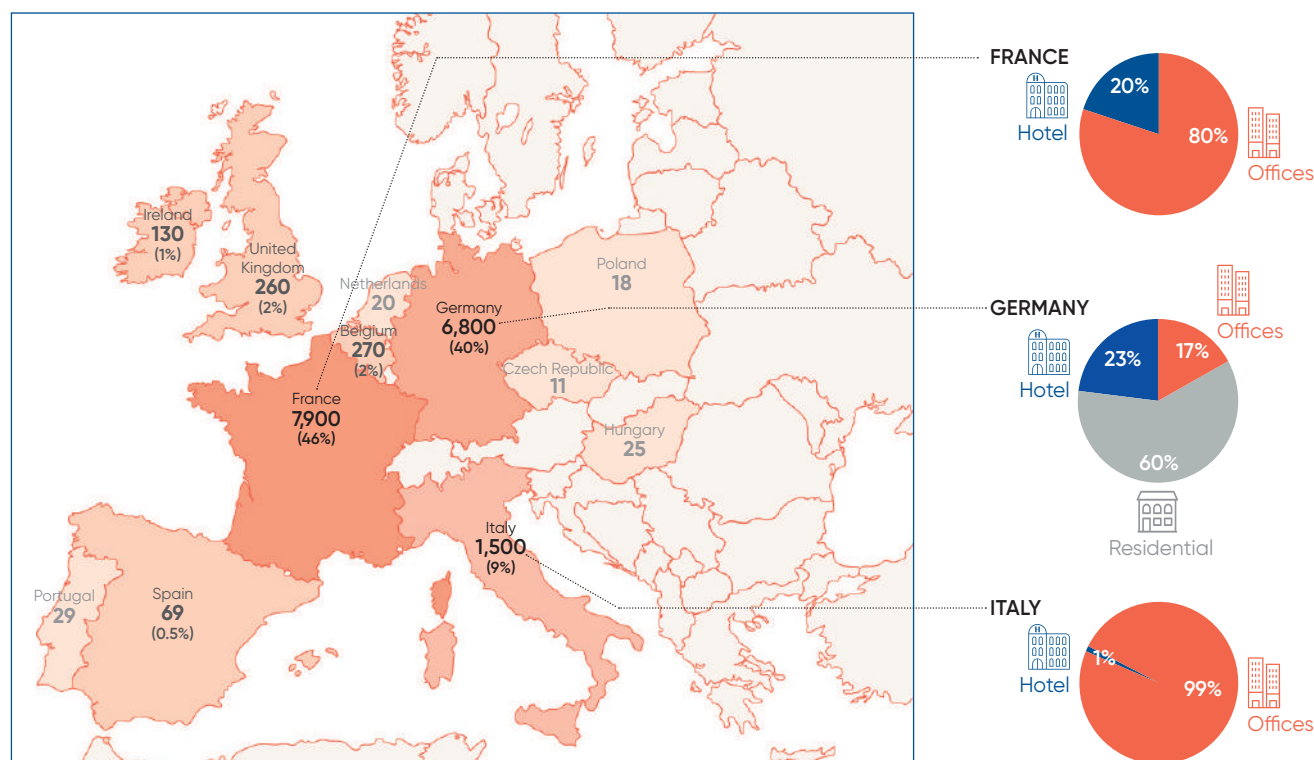
### The LOCAL FOOTPRINT® model

The LOCAL FOOTPRINT® model is a statistical assessment tool of the RIMS type (Regional Input-Output Modeling System) that reproduces the functioning of the regional economy as closely as possible. This model uses different sources (Eurostat, INSEE and BEA for 380 sectors), supplemented by the location coefficients of the University of Bristol. LOCAL FOOTPRINT® uses real or modelled purchasing, payroll and corporate tax data to simulate the socio-economic impact of a company's activities in a given area.

The analysis summarised below, which was carried out in 2024 on 2023 data, covers all the Group's activities (corporate, operating assets, development). It is based on data collected for Offices (France, Germany and Italy), Residential (Germany) and Hotels (Europe) activities.



## Map of Covivio's socio-economic impacts in Europe (17,000 jobs created)



The 17,000 jobs that Covivio provides in the countries where it operates are mainly concentrated in France, Germany and Italy: these three countries represent 95% of the jobs created. Four other countries account for the bulk of the remaining 5%: Belgium, United Kingdom, Ireland and Spain. Finally, five other countries are concerned to a lesser extent: Portugal, Hungary, the Netherlands, Poland and the Czech Republic.

### Focus on catalytic jobs

The tenant companies of offices and hotels have an economic activity with socio-economic impacts on a European scale. These impacts, known as catalytic impacts, are estimated in Group Share, on a pan-European scale (not only in the countries where the Group is present):

- 375,000 catalytic jobs related to companies occupying offices leased by Covivio (in France, Germany and Italy);

- 15,000 catalytic jobs related to companies operating hotels let by Covivio (in 10 European countries).

This contribution, which is not directly attributed to Covivio but to its tenants, should not be added to or compared with the economic benefits (17,000 jobs created) associated with the management and development of Covivio.

Country	Catalytic office jobs	Hotel catalytic jobs
France	171,000	9,000
Germany	50,000	2,000
Italy	95,000	1,000
Rest of Europe	59,000	3,000
<b>TOTAL EUROPE</b>	<b>375,000</b>	<b>15,000</b>

These catalytic impacts can be broken down into:

- **direct jobs** at companies occupying the offices let by Covivio and at companies operating the hotels let by Covivio;
- **indirect and induced jobs** supported by the activities of these companies (purchases made, wages paid, taxes paid, added value generated).

Direct jobs were estimated at 91,000 FTE at the companies occupying the offices let by Covivio, and at 10,000 FTE at the companies operating the hotels let by Covivio.

The impact in terms of catalytic uses can be assessed using appropriate indicators: per m<sup>2</sup> of office space or per hotel room. The following estimation has been made, in Group share:

- 0.25 catalytic jobs per m<sup>2</sup> of office space;
- 1 catalytic use per hotel room.

These indicators enable the positive externalities of land let to third-party companies to be measured, and thus the broader influence of Covivio's ecosystem, particularly at the local level, in the cities where it is present.

### The impact of the tourism sector on companies

Tourism is one of the drivers of global economic growth. It represents 1 in 11 jobs worldwide today<sup>(1)</sup>. By opening up access to decent work opportunities in the tourism sector, skills development and career progression make a positive contribution to society.

Tourism is one of the fast-growing economic sectors in the world today. It contributes 9% to global GDP, represents 1 in 11 jobs worldwide and 6% of global exports. The World Tourism Organization (UNWTO) forecasts that there will be 1.8 billion international tourist arrivals each year by 2030.

### 3.3.3.2 Policies towards affected communities (S3-1)

#### 3.3.3.2.1 Human Rights Commitments

The commitments made by Covivio and its subsidiaries take the communities that may be affected by their activities into account. The communities that are affected by the activities of Covivio and its subsidiaries are taken into account in its commitments. In the same vein, vulnerable communities that could be affected are included in the policies and actions described below.

#### Reducing the impact of construction sites on local residents and the region

Covivio strives to minimise any disruption or inconvenience to local communities in the context of its development or renovation operations. Covivio has set up a certain number of systems on its construction sites (section 3.3.3.3), in order to limit the risks or negative impacts for local residents. This, in particular, limits the risks of legal action (for noise, environmental damage, damage to the urban landscape, or other nuisances) and the risks of delays to the delivery of the development. These actions are deployed for all sites where risks relating to local residents have been identified and are mainly monitored by the Development Department.

#### Investing in city life

Since 2008, Covivio has developed a partnership and collaborative policy with non-profit organizations, focused on equal opportunities, relying in particular on skills-based sponsorship, which helps to enhance internal know-how.

#### Train future decision-makers in the real estate sector

The Palladio Foundation was created in 2008, under the aegis of the Fondation de France, by players in the real estate sector, including Covivio, to address the major challenge of urban construction. Covivio supports this Foundation, which is a place for meetings, exchanges, debates and reflection, through financial sponsorship and the participation of its managers and teams in the projects and events organised by Palladio. The theme chosen for 2024 was: "Taking care of the city", and in 2025, the theme will be: "The European city: a model to be defended?". Covivio is a signatory on the Charter of the City of Tomorrow University, which lays the foundations for a new working method based on cooperation between those who design, build and govern the city, those who talk about it and those who live in it.

Covivio's employees also participate in different study programmes such as ESTP or Dauphine, with subjects that are usually focused on sustainable development. Covivio offers practical knowledge and advice to students studying real estate in Italy every year.

### Support for equal opportunities via the Foundation

Created in 2020, the Covivio Foundation's mission is to structure and strengthen the sponsorship activities that the Group has already been carrying out for almost 15 years.

#### The Board of Directors of the Covivio Corporate Foundation

The Board of Directors, which meets two to three times a year, sets the Foundation's roadmap, manages the budget, approves the main projects to be funded, monitors the European coordination of the actions supported and ensures there is good communication between the Foundation and the Covivio teams. It is composed of three qualified external members and five internal members:

- **Alix d'Ocagne** Independent Director of Covivio & Chairwoman of the Foundation
- **Nathalie Blum** Independent
- **Bruno Derville** Senior Advisor
- **Géraldine Lemoine** Director of Communication, Covivio & Vice-Chairwoman of the Foundation
- **Yves Marque** Chief Operating Officer, Covivio
- **Anne Lhuillier** Independent sponsorship & philanthropy advisor
- **Tugdual Millet-Taunay** Chief Executive Officer (CEO) Hotels, Covivio
- **Giovanna Ruda** Chief Corporate Officer, Covivio (Italy).

Covivio has decided to focus its Foundation's actions on supporting initiatives related to projects that promote equal opportunities: access to education and training, access to work, access to housing, support for the integration or reintegration of vulnerable populations, etc. The Foundation's support is part of a dynamic that includes Covivio's endorsement of the Global Compact and its commitment to Human Rights relevant to the affected communities.

Covivio, through its Foundation, is committed to equal opportunities and supports around twenty associations in the three countries in which it operates, among which in 2024:

- in France: ActiV'Action, Article 1, la Cravate Solidaire, Refugee Food, Osons Ici et Maintenant, Wake Up Café, Fratries, Résidence jeunes Sainte Constance, PLAY International, Kabubu, etc.;
- in Italy: Fondazione Mission Bambini, Associazione La Strada, Fondazione Francesca Rava, L'Impronta Group, L'Accoglienza, etc.;
- in Germany: Al Farabi Music Academy, Fondation Oliver Kahn, Lebenshilfe, Ruhrwerkstatt, TAFEL, etc.

While financial support remains essential, the Foundation's aim is to develop 360° partnerships that go further and enable strong, personalised connections to be forged with each of the associations supported. Beyond its European dimension, the originality of this approach is that it offers several types of support to the partner associations: financial sponsorship, skills-based sponsorship, community projects, the provision of spaces within our property portfolio, gifts in kind (furniture and IT equipment), hosting of community events, etc.

Covivio thus offers partner associations one-off free access to several of its function rooms in which to organise training courses, seminars, governance meetings, etc.

<sup>(1)</sup> Source: Harnessing the Power of One Billion Tourists for a Sustainable Future | UN Tourism

For example, in 2024, Covivio hosted the Kabubu teams in one of its buildings during the Paris Olympic Games, because their premises were inaccessible during the event. In a much more enduring way, Covivio has hosted the La Cravate Solidaire association's largest clothing storage and sorting centre at its CAP 18 site in the north of Paris for over two years.

Thus, Covivio, in addition to its financial donation of €300,000, invests around €230,000 in sponsorship in kind and skills every year.

This approach allows Covivio to focus its efforts and resources on a limited number of projects in order to offer significant support to each association and strengthen the impact of their actions.

In order to ensure a relationship of proximity, a local committee of employees from Covivio's business lines has been set up in each country to follow up the sponsored associations. The local committees are also responsible for identifying future projects to be implemented and presenting them to the Foundation's Board of Directors.

The Covivio Corporate Foundation has a budget of €1.7 million over five years for financing projects, and the operating costs inherent to its actions.

- For further information: link Covivio Corporate Foundation

**33 associations**  
sponsored since the creation of the Foundation

**26 associations**  
sponsored at the end of 2024

Of which **15** sponsored for at least 3 years

More than **430 employees**  
have participated in a mission since 2021

Covivio received the "Mécénat & Solidarités dans la ville" award in the "Societal Commitment" category at the SIMI (Paris Real Estate Exhibition) in December 2023. This award, which rewards the solidarity actions carried out by real estate companies and awarded by the FEI (Fédération des entreprises de l'Immobilier), highlights the positive impact of the work carried out by the Covivio Foundation since its creation.

#### Covivio employees mobilised: focus on Socovivio Week in France and Socovivio Days in Rome and Milan

342 missions were carried out by Covivio employees during the third edition of Socovivio Week (France) and Socovivio Days (Italy) in 2024 (141 in Germany, i.e. 41%, 121 in France, i.e. 36%, and 80 in Italy, i.e. 23%). 1,523 hours were carried out for the benefit of 20 associations. On a voluntary basis, employees were able to participate in helping out missions such as meal-making workshops with Refuge Food, food distribution with Chorba, clothing sorting with Cravate Solidaire, HR coaching workshops with the Wake Up Café and gardening or cooking workshops at the Sainte Constance youth residence (Metz). The commitment of Covivio employees is growing. In fact, with 1,523 hours of volunteer work, the commitment has increased by 69% compared to 2023 (898 hours).

#### Local partnerships forged between hotel industry players and associations

Hotel operators are seeking to boost the integration of their hotels in the city. Thus, they have been encouraging the creation of partnerships with local associations for several years. For example, every year the Mériدين in Nice partners with the Red Cross (with donations of food, clothing and toys), participates in the Christmas party organised by the MIR association in their social hotel by providing food and drinks, and organises a clothing and cake sale in the hotel to raise funds for the WeForest association.

#### 3.3.3.2 Interactions with affected communities

The quality of interactions with local communities is key to the success of Covivio's activities.

Covivio has set up agencies in the field in close proximity to its real estate assets and customers. (3.3.3.3).

Real estate is experiencing an unprecedented transformation due to new technologies and new user needs and practices. For Covivio, innovation is both a factor in improving its competitiveness and opening up new markets. Covivio is rolling out its innovation programme on a European scale in order to keep pace with the trends that are driving its markets. This is based on two pillars: firstly, identifying and facilitating the implementation of new processes and materials designed to make buildings more resilient and virtuous. Secondly, deploying new offers and systems to improve comfort and services for occupants, often by using local economic operators. (ESRS S4 -3.3.4.3.1).

#### 3.3.3.3 Compliance with international Human Rights guidelines

As a signatory of the Global Compact, Covivio aims to be exemplary in complying with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines. For example, its Human Rights Policy (ESRS S2, section 3.3.2.2.2) or its Responsible Purchasing Charter (ESRS S2, section 3.3.2.2.1) refer directly to the international texts.

#### 3.3.3.3 Collaboration with communities (S3-2)

Covivio strives to anticipate and limit nuisances and to set up risk management and prevention mechanisms for its construction and renovation operations. Upstream of projects, a map of the residents in the vicinity of the construction site is drawn up to assess the risks to them. Information meetings are held for local residents when a project requires it, often in conjunction with local authorities. Covivio informs local residents in advance about the nature of the project, the duration of the works, the construction site and delivery times, the companies involved in the project, and the points of contact, via a letter displayed on construction site. It may be supplemented by targeted information letters. In addition, a complaint handling mechanism is deployed on development projects, allowing complaints to be submitted via a specific email address and/or a letterbox installed directly on the construction site. The contact details to be used, if necessary, by third parties and in particular local residents, are displayed on the construction sites.

Covivio has four regional branches in France (Lille, Lyon, Bordeaux and Marseille) in addition to its offices in Paris and Metz, to enable it to work as closely as possible with its stakeholders and take the concerns of its customers and local residents into account. In Germany, offices and management agencies have been opened in Berlin, Dresden, Essen, Hamburg, Leipzig, etc. to complement the teams at the head office historically located in Oberhausen. In Italy, the workforce is based in Rome and Milan. Covivio is also represented in Luxembourg by two employees and in Spain by a Country Manager, to assist its local development as close as possible to its partners. Covivio works to enhance the profile of the areas where its buildings are situated, in particular by participating in numerous public relations events.

The collaboration with the communities during the development phase, is mainly undertaken by the General Management, the Development Management and the Institutional Relations Management.

The effectiveness of the collaboration can be measured by the level of acceptance of the project at delivery or the number of complaints during the project or the number of complaints that were able to be resolved. However, as each project is specific and the contexts are different each time, there is no single method that can be used to assess the effectiveness of collaborations.

The consideration of indigenous peoples and their specific rights is not considered material in the context of Covivio's activities (double materiality matrix: ESRS 2, section 3.1.2.4.2).

### 3.3.3.4 Actions to address negative impacts and channels for communicating with affected communities (S3-3)

All communication channels such as the whistleblowing and complaints mechanism (ESRS G1, section 3.4.2.4) are deployed on development projects. In addition to these channels, additional measures, such as newsletters, can be used for projects in dense urban areas where there are many local residents. An app is set up by the company in charge of the works for these construction sites so that local residents can follow the news about the site (noisy work phases, noise prevention, general information, etc.) or get in touch with the companies working on the site. Covivio is directly informed if complaints are made on the platform, in order to ensure that appropriate solutions are put in place in cooperation with the companies concerned.

In addition, monitoring devices can be installed during the construction phase, especially to monitor noise levels. A range of measures by construction companies also help to limit noise and visual pollution. Covivio's low-nuisance construction site charter also enables site workers to be involved in subjects such as risk prevention, soil and air pollution, and waste management.

The projects are developed in close liaison with the local authorities, so as to take account of the constraints and opportunities for the regions, as effectively as possible.

The hotels are also directly involved in local initiatives initiated by local authorities. For example, the Mériadien de Nice participates in the "Nice Ville Verte" fund. This is a sponsorship initiative launched in 2023 by the Nice-Côte d'Azur metropolitan area. Its objective is to open up and share greening initiatives with economic players in the region.

### 3.3.3.5 Actions to address risks to affected communities and opportunities (S3-4)

#### 3.3.3.5.1 Action plan to manage impacts, risks and opportunities related to affected communities

Covivio is also involved with local authorities, such as the City of Paris, by committing to the Paris Action Climat network, which launched the Charter of the same name. This Charter, which has become Paris Action Climat Biodiversité, invites companies to commit to combating climate change and to the Climate Plan. It was updated in 2018 when Covivio signed it again, committing to adopting an operational action plan by 2030 and contributing to Paris' carbon neutrality trajectory.

#### Open hotels in the city

With a portfolio of 283 hotels, 90% of which are located in the main European capitals, Covivio is one of Europe's leading hotel owners, with 39,477 rooms. To open up hotels more to the city, a number of brands are modifying their offerings to provide greater access to local residents. This concerns bars, restaurants, co-working spaces, patisseries, rooftop terraces, etc., such as the Zoku hotel, developed by Covivio, and which is located in Stream Building, a mixed-use programme, and winner of the Reinventing Paris competition. Developments that contribute to making establishments more lively with hybrid spaces in which people can work or relax.

Here, design acts as an element of hybridity, offering several uses, services and experiences in the same space, for example in the lobbies, which now offer a restaurant/café and creativity rooms, a library and children's games. This new spatial design encourages discovery and interaction, in particular by enabling both external customers and local residents to enjoy the same experiences. No need to necessarily be a customer, the hotel is finding its place in city life.

#### In Madrid, the Radisson Red RED opens up to the city

Owned by Covivio, this former independent hotel located in the heart of Madrid was completely renovated by the Radisson Hotel Group, and reopened in 2022 under its RED lifestyle brand. The starting point for this renovation was to open up the ground floor as much as possible and give it a new, more welcoming glass façade. The reception is now situated at the end of the central hub, which houses a restaurant and a bar overlooking the street. The restructuring also involved the creation of a rooftop with a restaurant and terrace, offering a spectacular view of the city. The objective, which is a success, was to turn this establishment, with its meticulous design and services, into a real living space.



Details of other collaborative and communication-based initiatives in managing relations with local residents are provided in section 3.3.3.3.

Covivio takes the necessary measures in advance to ensure that Human rights are respected in its real estate projects. Thus, there is no need for a specific remediation procedure if a human rights incident occurs because the issue has been dealt with beforehand.

### 3.3.3.5.2 Additional CSRD data requirement (S3-4)

<b>Identification of appropriate actions and measurement of their effectiveness</b>	The diverse and highly variable nature of the actions implemented in terms of collaboration and communication means that it is not possible to carry out a quantification or consolidated monitoring of the effectiveness of the processes put in place to remedy the negative impacts on the affected communities.
<b>Description of serious Human Rights issues and incidents related to affected communities</b>	No incidents concerning respect for Human Rights were recorded in the Group in 2024.
<b>Description of the resources allocated to manage material impacts</b>	The low number of reports of negative impacts means that the resources deployed (staff, budget, etc.) remain marginal and potentially variable, and do not allow for quantification.
<b>Handling complaints</b>	Communities that could be affected by Covivio's activities are authorised to use the previously mentioned channels to raise concerns or needs. The use of whistleblowing procedures cannot give rise to reprisals as long as it is not defamatory. Complaints are handled confidentially, with respect for privacy and data protection rights. Anonymous reports will be considered provided that the reported facts are sufficiently serious and detailed.
<b>Indication of whether and how the company seeks to use its leverage with the relevant business relationships to manage material adverse impacts on affected communities about impacts communities</b>	Covivio is a member of the Fédération des Entreprises Immobilières (FEI) and the European Public Real Estate Association (EPRA) at the European level. These two bodies represent real estate companies before a certain number of bodies and help to define and express sectoral positions in this area (responses to consultations on texts organizing taxonomy, the tertiary decree (EIF), etc.).

### 3.3.3.5.3 The UN's 17 Sustainable Development Goals for 2030

In 2015, 193 governments around the world adopted the 2030 Agenda for Sustainable Development, comprising 17 Sustainable Development Goals (SDGs) and 169 targets. This programme aims to eradicate extreme poverty, and to combat inequality and climate change by 2030.

Covivio has been expressly referring to the UN's 17 SDGs since 2016, particularly in its CSR publications, which are available on its website or on the UN's dedicated website as a signatory of the Global Compact. Covivio's multi-year CSR objectives presented in this document are consistent with the SDGs they contribute to. Covivio also respects the OECD Guidelines for Multinational Enterprises and the eight fundamental conventions of the International Labor Organization.



The in-house study conducted in 2017 and completed in 2018 and then in 2020, based on an analysis matrix, enabled the nine major SDGs to be specified for Covivio, based on its targets:



The issues represented by each of these objectives hold an important place in Covivio's CSR policy and in its economic model. Each refers to the actions taken within the portfolios of buildings developed and owned by Covivio as well as internally, within the company's corporate scope, as an employer.

### 3.3.3.6 Objectives to limit impacts on affected communities (S3-5)

#### 3.3.3.6.1 Objectives set

The socio-economic impact study carried out on all the Group's activities in Europe enables Covivio's contribution to direct and indirect employment to be quantified. This study is presented in paragraph 3.3.3.1.3. The results are based on the volume of operations developed, managed or leased. They cannot be translated into objectives.

#### 3.3.3.6.2 Involvement of affected communities in defining objectives

In 2020, Covivio set up a Stakeholders Committee, composed of members from inside and outside Covivio. It conducts forward-looking work by exploring and analysing major trends and weak signals which directly or indirectly impact Covivio's scope of intervention. Its members meet two or three times a year around a common theme, with the aim of sharing their work with the company's internal and external stakeholders.

#### Bertrand de Feydeau - Chairman of the Committee, Honorary Chairman of the Fondation Palladio

<b>Stéphan de Fay</b> Chief Executive Officer (CEO) of Greater Paris Development	<b>Jade Francine</b> Co-founder & Director of Development WeMaintain	<b>Alexandre Labasse</b> Chief Executive Officer (CEO) Paris Urban Planning Workshop	<b>Sonia Lavadinho</b> Founder & Director of Bfluid
<b>Jérôme Ruskin</b> Founder & Chief Executive Officer of Usbek & Rica	<b>Patricia Savin</b> Lawyer, Chairwoman of the Orée Association, Independent Director of Covivio	<b>Jean-Paul Viguié</b> Architect & Urban Planner	<b>Jean-Luc Biamonti</b> Chairman of the Board of Directors Covivio
<b>Christophe Kullmann</b> Chief Executive Officer of Covivio	<b>Olivier Estève</b> Deputy CEO Covivio	<b>Géraldine Lemoine</b> Head of Communication Covivio	<b>Yves Marque</b> Chief Corporate Officer Covivio

- For further information: Summary of the work of the Stakeholders Committee - Shaping Social Rhythms 2023/2024



### 3.3.4 Consumers and end-users (ESRS S4)

The ESRS S4 standard addresses the consumers and end-users related to the business and value chain of the company. The challenge is to explain how the impacts and dependencies of the company on consumers and end-users can generate risks and opportunities. This will involve presenting Covivio's general approach in terms of identifying and managing significant impacts on consumers and end users. This in particular concerns the impacts related to information, personal safety and social inclusion.

#### 3.3.4.1 Covivio consumers and end-users (S4.SBM-3)

Covivio places the user at the centre of each of its projects. This is echoed by its Purpose, "Building well-being and lasting relationships", with the aim of continuing to optimise satisfaction among customers and building occupants.

Covivio has grown by forging and developing strong links with its main stakeholders. Its activity involves a multitude of relationships with various stakeholders, both private and public, of different sizes and sectors. As the Group's success is partly based on the quality of its relationship with external stakeholders (customers, financiers, local authorities, etc.), this was considered to be a risk, but was analysed as one that is very well managed. Specific strategies have been set up to respond as effectively as possible to the expectations of customers, suppliers and consultants. Besides the quality of the relationship and the trust cultivated within the framework of structuring partnerships Covivio sees cooperation with its external stakeholders as a real lever for innovation and growth.

##### 3.3.4.1.1 Types of Covivio consumers and end-users

A distinction should be made between:

- Covivio Hotels **consumers**: these are mainly corporate tenants of leased assets and managers of hotel operating properties;
- Covivio Hotels **end-users**: these are the customers of its hotel lease properties or its hotel operating properties.

For Covivio, its consumers and end users who are subject to material impacts constitute all of its **customers**. Covivio strives to develop "tailor-made" solutions for each of them, taking their strategic challenges into account. Covivio is close to its customers (refer to the strong partnerships section) and analyses weak signals and market trends in order to anticipate the needs and expectations of its consumers and users.

The safety of property and people remains a major concern for Covivio, even if the regulations (GDPR, fire, etc.) and the numerous measures taken by Covivio's teams and their suppliers help to ensure that these risks are properly managed. Cyber risks are constantly increasing. Covivio takes this into account when managing its buildings and within its corporate scope. In

particular, the Group respects strict rules regarding the conditions for collecting and storing data that could be sensitive for tenant service companies or their employees, as well as for hotel employees and customers.

#### 3.3.4.1.2 Covivio's positive impact for its customers and end users

Covivio Hotels is committed to developing high-quality real estate that meets the requirements of consumers (customers) and end-users.

Flexibility, adaptability to new uses and new technologies, and the quality of the facilities and equipment (connectivity, green spaces, etc.) satisfy the requirements of even the most demanding customers.

Lastly, the environmental strategy deployed by Covivio to reduce energy and water consumption has a direct and tangible impact on the control of operating expenses for tenants. The high standards of construction and management include aspects of comfort and well-being in terms of light, acoustics and even olfactory ambiances, in order to promote a sense of calm and comfort. By the same token, rooftops, terraces, greenhouses and patios all contribute to improving the experience of customers... and neighbours who have a direct view of these facilities.

#### 3.3.4.1.3 Description of the risks and opportunities arising from the impacts identified by Covivio

Covivio closely monitors the material risks and opportunities facing the Group. By monitoring its mapping of material CSR risks, Covivio is able to implement actions to mitigate risks and transform them into opportunities. Consumers and end users form an integral part of these risks, as they are at the heart of its business.

The dual materiality study carried out as part of applying the CSRD has enabled the Group's CSR risks to be updated, by integrating the specificities of each activity, particularly those of the hotel industry. The dual materiality matrix was then rolled out for Covivio Hotels. In both cases, the two most important impacts with regard to customers and end users are the security and quality of the information provided to them.



#### ESRS S4 - INFORMATION FOR CUSTOMERS AND END-USERS

<b>Description and key words</b>	Quality of service delivered to customers
<b>Main impacts</b>	Direct impact on customer satisfaction, as customers may consider Covivio responsible for the failures.
<b>Positioning in the value chain</b>	Direct and downstream operations
<b>Occurrence</b>	Occasional
<b>Main risks</b>	Financial risk: data protection: GDPR sanctions of up to 4% of a company's revenues in the event of a breach Reputational risk: Name and Shame principle in the event of a GDPR breach
<b>Main opportunities</b>	Long-term financial stability
<b>Materiality</b>	Material

#### ESRS S4 - CUSTOMER AND END-USER SECURITY

<b>Description and key words</b>	Well-being, comfort Safety/Health
<b>Main impacts</b>	The impact on the health of occupants has become a major topic since the Covid pandemic in 2020. Direct impact on customer satisfaction, as customers may consider Covivio responsible for the failures. Positive impact: contribution of well-being to occupants
<b>Positioning in the value chain</b>	Direct and downstream operations
<b>Occurrence</b>	Frequent
<b>Main risks</b>	Risk of security failure in buildings or asset resilience leading to the inability to manage major crises that could cause an incident, an accident, a health risk, or even engage the Company's liability
<b>Main opportunities</b>	Long-term financial stability
<b>Materiality</b>	Material

#### ESRS S4 - SOCIAL INCLUSION OF CUSTOMERS AND END-USERS

<b>Description and key words</b>	Inclusion of disabled customers Social inclusion with a network of assets accessible by public transport
<b>Main impacts</b>	Impact on the well-being of disabled employees and/or customers if hotel buildings and services are not optimised to include all users (11% of disabilities are related to a work-related accident and 59% <sup>(1)</sup> of disabilities are related to or aggravated by work activity)
<b>Positioning in the value chain</b>	Downstream
<b>Occurrence</b>	Occasional
<b>Main risks</b>	Financial risk: Accessibility issues are well covered in the countries of operation. Nevertheless, the process of upgrading certain hotels to comply with regulations is complex (e.g. regulations governing historic buildings)
<b>Main opportunities</b>	Long-term financial stability
<b>Materiality</b>	Non-material

The tenants of Covivio Hotels do not conduct their activities in "particular contexts" as defined by ESRS S4, and therefore do not present specific risks.

Covivio Hotels is not dependent on a customer which represents an excessive share of its revenues. Overall, Covivio Hotels tenant brands have ambitious CSR policies and strong levels of commitment.

(1) Source : HANDICAPS ET EMPLOI - Rapport thématique 2019-2020 de l'Igas | Igas (French only)

### 3.3.4.2 Policies towards customers and end-users (S4-1)

The attractiveness of Covivio's buildings is a value issue:

- firstly, in terms of rent: the attractiveness and satisfaction of tenants and end users results in a high renewal rate at Covivio, and a low vacancy rate;
- secondly, in terms of asset valuation: an attractive building that is 100% occupied enjoys good liquidity and a higher valuation.

The dual materiality study positioned the themes "S4- Safety of customers and end users" and "S4 - Information to customers and end users" as being of some importance, particularly from the point of view of the potential impact on customers and subsequently on Covivio if its buildings and their management did not meet the expectations of the market and in particular of consumers and end users.

The value of Covivio Hotels' buildings benefits from the Group's fight against obsolescence by combining environmental, social and financial performance. The risk of obsolescence (Sector issue, section 3.1.3.1) has been identified as material both by the double materiality study and by the risk study followed by the Audit and Internal Control (ACI).

#### 3.3.4.2.1 Customer safety, at the heart of Covivio's challenges

The safety of consumers and end-users is a major issue at all stages of the asset's life: new project development, management/operation, or renovation.

In addition to the stringent regulations in force in Europe, Covivio Hotels applies the highest standards, in particular through high levels of certification that include safety and well-being aspects. Covivio Hotels relies on dedicated Covivio teams and tools in order to go further in terms of environmental safety (asbestos, etc.).

For more information, please refer to:

- on certifications: Section Sectoral issues, section 3.1.3.1.3.
- on environmental safety: ESRS E2, section 3.2.2.2.

#### 3.3.4.2.2 Action to secure data in the buildings

Covivio generates and manages a huge amount of data in the course of its business and is therefore subject to the General Data Protection Regulation (GDPR). In addition, its buildings use an ever-increasing number of computerised equipment and services. By becoming a "smart building", increasingly linked to the smart city via data exchanges, buildings, like Covivio's activities, are exposed to the risk of cyberattacks, losses, damage, data theft, etc. Covivio is aware of these risks and has taken a number of measures to protect its business and the business of its stakeholders.

Robust security strategies have been put in place to provide effective data protection in smart buildings, including monitoring and managing access, installing firewalls, and training staff and users in cybersecurity best practices.

### Data protection, a real estate issue

A growing number of cyberattacks worldwide target buildings and their equipment (BMS/GTC, cameras, access control, etc.). In 2016, Covivio commissioned Arp-Astrance to conduct a study on the risks of cyberattacks on its building portfolios. This study enabled the solutions to reduce the risk to the networks and management equipment to be identified and prioritised.

#### 3.3.4.2.3 Accessibility to buildings as a lever for inclusion

Accessibility and location are key criteria for hotels. A lower quality location can create a risk of obsolescence for a hotel. Covivio Hotels masters this risk well through the quality of its choice of locations.

Covivio has set itself the target of ensuring that, by the end of 2025, at least 95% of its buildings are less than 1 km from public transport (train, RER, metro, bus, tram, etc.). At the end of 2024, 97.1% of the assets held by Covivio Hotels were located less than 500 m from public transport, and 99.5% were less than 1 km away.

#### 3.3.4.2.4 Acting to ensure that buildings are accessible to disabled people

Covivio is particularly attentive to ensuring that its buildings are accessible to disabled persons and to removing architectural barriers in public spaces. The legislation in the countries where Covivio operates sets out technical parameters that must be met: minimum door width, staircase characteristics, particularly to encourage their use for the first floors rather than the lift, lift dimensions, access ramps, toilet characteristics, etc. Covivio's developments and renovations comply with the most ambitious accessibility standards.

A range of solutions have been put in place in new and existing buildings to improve the quality of life for people with visual or hearing impairments, including the installation of audible signals and illuminated signage.

#### Improving the hotel experience for disabled people

A number of hotels already have facilities that go beyond the regulatory requirements, in order to enhance the comfort and inclusion of disabled guests. This is the case for the Hilton Lille hotel, for example, which offers:

- lift equipped with a Braille system;
- digital alarm clock with sound and vibrating pad and/or warning light;
- telecommunications equipment for hearing-impaired guests;
- visual alarms for hearing-impaired people in common areas;
- subtitles on televisions;
- lowered emergency evacuation instructions;
- portable shower chairs;
- sports facilities accessible to people with reduced mobility.

### 3.3.4.2.5 Covivio's Human Rights commitments for its customers and consumers

Covivio has been a signatory of the Diversity Charter since 2010 and a member of the Global Compact since 2011. The Company incorporates the 10 principles of the Global Compact into its strategy and practices, and promotes them to its stakeholders, particularly its suppliers, via its Responsible Purchasing Charter. Covivio's Human Rights Policy refers to these texts, as well as to those of the ILO.

The dual materiality analysis showed that the topic of Human Rights is not material for Covivio in its relationship with consumers and end users. Nevertheless, the Group's Human Rights Policy requires that these rights are respected in its own offices and in the buildings it manages or is developing. It covers these different scopes, with specific provisions targeting its hotel operating properties and condemning all forms of human trafficking. In addition, employees of hotels owned by Covivio Hotels take part in awareness-raising activities to identify signs of prohibited behaviour.

- For more information on Covivio's Human Rights Policy: ESRS S2, section 3.3.2.2.2.

### 3.3.4.3 Deployment of Covivio customer policies - (S4-2)

Covivio's policy in relation to its consumers and end customers is reflected in a wide range of actions. However, it did not give rise to any particular formalization other than what is presented in the following paragraph.

#### 3.3.4.3.1 Inventing new uses for real estate

**Innovate to improve the comfort and use of buildings by leveraging smart systems**

The other focus of Covivio's innovation strategy is to deploy "smart" systems that optimise building energy management, improve occupant comfort, facilitate predictive maintenance, and integrate connected solutions to allow more efficient and sustainable building management. These initiatives rely on the skills of a special team within the IT Department to combine several innovative technologies:

- the installation of centralised IP networks that connect items of technical building equipment (BMS, IoT, sensors). These networks offer simplified management and rationalization of digital infrastructures;
- the deployment of Powerbat (real-time energy consumption monitoring) and Witco (occupant services) platforms (3.3.4.4), etc.;
- the use of a centralised platform that consolidates building data in a single dashboard, thus facilitating building management.

**Innovate to improve the customer experience**

The customer experience is one of Covivio's areas of innovation, which is embodied in the deployment of the Witco application, which allows occupants to dematerialise numerous services such as access, real-time visualisation of the use of workspaces and payment for services (catering, etc.).

The "managed office" service developed by Covivio releases the user from having to manage certain services (concierge, catering, entertainment, etc.). Covivio's "All-in-One" approach offers increased use value and "à la carte" support for prospects in the design of their real estate project.

### Artificial intelligence, a lever for future innovations

Artificial intelligence (AI) should help enrich the relationship between owners, managers and occupants of buildings, by using technology to promote well-being and efficient building management. By collecting and analysing data from connected sensors in real time, AI will, for example, enable energy consumption to be analysed and optimised, maintenance needs to be anticipated, operating costs to be controlled and increasingly personalised services to be offered (suggestions based on use or habits: catering, temperature settings, lighting, etc.).

#### New uses for new offers in the hotel industry:

Uses are evolving: fewer business trips but for longer periods, leisure trips where people work remotely, a desire to have standout experiences. Hotel customers are becoming more hybrid, and operators are adapting.

New uses that bring new offers. The **Stream Building**, delivered in 2022, will host the first Zoku hotel in France. Its concept: offering lofts, real micro-apartments that allow people to live, work and receive friends and business relationships. In all, 109 lofts, co-working spaces, a restaurant, a bar, and a vast rooftop. The workspaces and social spaces are open to all.

### 3.3.4.3.2 A strategy of long-term partnership and optimising customer satisfaction

Covivio favours a long-term partnership strategy with customers, shareholders, suppliers, local authorities and associations.

**A strategy of long-term partnership and optimising customer satisfaction**

With a portfolio of 283 hotels in 12 countries, Covivio Hotels is the main real estate partner of hotel operators in Europe (AccorInvest, IHG, NH Hotel Group, B&B HOTELS, Meininger Hotels, Radisson Hotel Group, etc.). By placing the customer experience at the heart of its strategy, Covivio Hotels is helping to renew the hotel offering and experience by identifying the best concepts and contributing to the deployment of the most innovative brands.

Customer satisfaction is a crucial issue. Customers can now express their satisfaction or dissatisfaction after a stay in a number of ways. For example, they can give their opinion on online platforms (Booking, Expedia, Google, etc.) or via questionnaires sent by hotel operators. These opinions represent a dual challenge for operators:

- the quality of the response given to an unsatisfied customer is essential to ensure that they will return in the future;
- these comments are valuable for identifying priority areas for improvement in the establishments, particularly during the preparatory phase of renovation work.

Covivio Hotels uses several tools to guarantee the quality of the service offered to customers in its hotels:

- the management of customer comments and complaints is contracted with hotel operators. The management of each hotel is responsible for responding to and following up on customer comments. There may be penalties if managers do not respond to disputes in accordance with the contracts (response times, compensation, etc.);
- the data related to customer comments/complaints are monitored monthly (analysis of the rate, type of response) by Covivio Hotels' teams;
- a level of customer satisfaction, based on the average of the online satisfaction rating and the rating of the brand questionnaire, is set for the award of a performance-related bonus to the operator. Some contracts state that non-attainment of qualitative performance is a reason for terminating the contract.

### 3.3.4.3.3 Succeeding together in the environmental transition

Covivio is aware of the need to involve its partners (customers, suppliers, etc.) to ensure that its environmental transition action is successful, especially with regard to its 2030 carbon trajectory (ERS E1, section 3.3.4.4). Covivio's Purpose, "Building well-being and lasting ties", expresses this challenge as well as its know-how in this area.

By implementing various concrete actions, such as environmental annexes or Sustainable Development Partnership Committees, Covivio has laid the foundations for an effective and constructive exchange relationship in order to optimise the environmental performance of buildings. Covivio has been organising Sustainable Development Committees in France since 2010, as part of its special relationship with each customer. These contribute to raising tenants' awareness of various environmental issues: energy, carbon, water, waste, etc. Covivio now wants to raise awareness of nature issues by integrating biodiversity. These Committees facilitated and anticipated the implementation of the environmental annex on 100% of the leases covering more than 2,000 m<sup>2</sup> of retail or office space in France. These exchanges made it easier to implement the Tertiary Eco Energy scheme (tertiary sector decree) as well as the actions associated with the energy conservation plan launched at the end of 2022.

The tenants and operators of Covivio Hotels buildings have introduced proactive policies to reduce their energy and water consumption, cut their waste production and their ecological footprint, strengthen their ties with stakeholders, and be acknowledged to be responsible and committed players in the face of major environmental and social challenges. Their customers, both private and professional, are also increasingly sensitive to environmental issues and demand healthy food and virtuous products and services.

#### Eco-responsible hotels: what customers expect

An increasing number of travellers are looking to stay in hotels that are more environmentally friendly. This trend is part of sustainable and responsible tourism. By choosing eco-responsible hotels, customers can minimise their environmental footprint or that of their employer.

62% of travellers surveyed as part of the survey conducted

on the initiative of Booking in 2024 are sensitive to or even looking for eco-responsible hotel solutions<sup>(1)</sup>. In addition, this type of hotel often offers an authentic and immersive experience in the local culture. These establishments often incorporate elements of regional tradition and savoir-faire, allowing visitors to discover and appreciate the culture of the place.

### 3.3.4.4 Management of Covivio's negative impacts on consumers and end-users (S4-3)

Covivio's activity is based on a "premium" service. This is based in particular on a permanent search for customer satisfaction, so that Covivio does not have any negative impacts for its customers. Nevertheless, frequent meetings and contacts with customers as well as satisfaction surveys make it possible to identify areas for improvement for Covivio, its suppliers and operators.

Customer confidence is demonstrated by the systems set up by the hotels, the communication channels used, and the survey results (3.3.4.3.2). The verbatim reports of customer surveys are sent directly to the site manager. The site manager must propose an action plan to remedy each negative impact raised. The management of Covivio Hotels monitors suggestions for improvement and ensures that they are implemented.

In every country where Covivio operates, if customers or users wish to report a negative impact other than through their dedicated contacts, they can use the Covivio whistleblowing platform (3.4.2.4). It is accessible to all internal and external stakeholders. There were no alerts in 2024.

Please note that Covivio Hotels uses several tools to guarantee the quality of the service and the responses to comments and complaints from consumers and end customers, as specified in section 3.3.4.3.2.

### 3.3.4.5 Action plan to manage material impacts, risks and opportunities (S4-4)

Some of the action plans put in place by Covivio to manage the impacts, risks and opportunities connected to its customers are detailed in section 3.3.4.3.

#### 3.3.4.5.1 Offering customers a health/safety environment that exceeds standards

##### Committing to customer well-being

People in the northern hemisphere spend approximately 90% of their time indoors. The building has an impact on the health and well-being of its occupants, whether through temperature, indoor air quality, lighting quality, noise or the greening of spaces. Covivio aims for the highest construction standards (HQE, BREEAM, etc.) in order to optimise the comfort and well-being of the users of its buildings.

For tertiary buildings under direct management, 100% of the assets are subject to assessments relating to the health and safety of occupants of the hotel operating properties (EPRA H&S-Asset). This system was reinforced during the Covid period and has been closely monitored since then. None of the buildings analysed were deemed non-compliant (EPRA H&S-Comp).

(1) <https://news.booking.com/fr/le-dernier-rapport-de-bookingcom-sur-le-voyage-durable-met-en-evidence-les-defis-auxquels-sont-confrontes-les-consommateurs-et-souligne-la-nec>



### Limiting noise pollution

Hotel rooms must provide rest and peace. Covivio Hotels, which places the user's comfort and well-being at the heart of its projects, endeavours to own buildings that optimise acoustic conditions for the occupants (choice of materials, embellishments, organisation of spaces, etc.). In the context of its developments and renovations, Covivio is also committed to reducing the exposure of users and local residents to noise pollution from construction sites.

### Indoor air quality, a health issue:

The quality of indoor air in buildings is increasingly becoming a matter of concern for hotel guests. The 2019 health crisis has given new prominence to this issue, transforming it from an element of comfort and well-being to one that has an impact on health. In addition, according to a study by Harvard TH Chan School of Public Health, the concentration of pollutants (VOCs, fine particles, CO<sub>2</sub>) could cause sleep disorders and restless sleep. Indoor air quality and olfactory comfort in buildings is therefore an important issue for Covivio Hotels and its operators. A range of studies and monitoring operations have been carried out on the portfolio, including the use of air purifiers in some cases.

#### 3.3.4.5.2 Action plan to secure data and information systems in buildings

##### Leveraging synergies to strengthen the operational efficiency of teams

Covivio is deploying an ambitious strategy to adopt the best practices in its market, particularly in terms of tools, as part of a European integration process for its business lines, its organisation and information system, and to maintain greater control over its growth and IT costs.

For example, these tools are designed to support the digitisation of customer relations and the development of the Group's activities in Europe, in particular through the Salesforce solution, aimed at providing Covivio with a CRM (Customer Relation Management) software package, or the deployment of SAP software in 2021. In keeping with the change management approach, the implementation of these tools has involved workshops to reflect on the processes and harmonisation of working methods (10% of the total workforce mobilised for SAP).

In parallel, a project to "move to cloud" for the Group's IT infrastructure systems was carried out, again with the aim of accelerating cooperation and the integration of IT. It allows for greater flexibility in the management of business applications and improves the security of IT infrastructures at the European level.

#### 3.3.4.5.3 Covivio's action plan to create positive impacts for its customers

##### With art, Covivio buildings are to be experienced and visited

Convinced that art contributes to the identity of a place and the construction of a common space while stimulating exchanges and creativity, Covivio joined the "1 building, 1 work" programme in 2018, under the oversight of the Ministry of Culture. This is a programme that encourages its members to commission or purchase a work of art from a living artist for their buildings, thereby supporting artistic creation in keeping with the best practices of the artist's profession. Art has thus become an integral part of Covivio, which has adopted a global and

committed approach at Group level in order to create a strong identity for its assets, facilitate encounters between art and city users, and create unifying communal spaces. Covivio encourages the emergence of artists who respect the environment in their creative process.

This initiative is being rolled out in the main new or renovated buildings, whether offices, hotels or housing unit, in France, Italy and Germany. From Marseille to Milan, via Berlin, from street art to the design of a monumental sculpture, there are already 20 works that give colour to the Covivio portfolio and help to create links and a range of experiences.

The Ibis Montmartre hotel has been home to a mural from the Generation Equality Forum created by Spanish artist Lula Goce since 2021. The Generation Equality Forum partnered with ONU Femmes and Street Art for Mankind to create a series of three murals in several locations around the world. These murals use art to spread the vision of faster progress towards gender equality around the world.

##### Supporting artistic creation and presentation in the regions

Art at Covivio also aims to contribute to the visibility and attractiveness of the regions. During the summer of 2023, Philippe Katerine's poetic and offbeat artwork was on display in the streets of Clichy and Paris 17. This sponsorship action, backed in particular by Covivio, supported the "Mignonisme" exhibition and, in collaboration with the town halls of Paris, Paris 17 and Clichy, satisfied the following objectives, to:

- promote Greater Paris by bringing together Paris 17 and Clichy for an artistic journey between the two cities leading to a free institutional exhibition;
- transform and revitalise the Porte de Clichy after many years of construction work and disruption for users and residents;
- provide access to an artistic event open to everyone, 24 hours a day, in the public space;
- introduce the work of a popular artist with offbeat humour.

##### Share its commitments with customers

Covivio's 'We Care' programme offers a series of events and activities to enable it to share its engagement with its customers, in particular by introducing them to the associations supported by the Covivio Foundation. Some examples of actions carried out in 2024:

- collection of work clothes organised in 16 Covivio buildings. A total of 463 kg of clothing was collected and recycled, i.e. 200 kg more than in 2023;
- hosting Kabubu free of charge for 2 weeks at the Art&Co building (Paris 12<sup>th</sup>); as this association's premises were inaccessible at the start of the Olympic Games;
- The Solidaire Vertigo race organised by the PLAY International association, hosted in the CB 21 building in Paris La Défense. This was an opportunity to mobilise Covivio teams and customers around this event, intended to raise funds to finance the association's projects. More than 1,000 runners started and €100,000 was collected.

These meetings are also an opportunity to invite customers to go further, for example by becoming volunteers for the association concerned or by getting involved occasionally.

### 3.3.4.5.4 Measuring and monitoring the actions implemented

Covivio has set up satisfaction surveys to measure the impact of its actions on its customers. Details of these surveys as well as the monitoring of their results are provided in the "optimising customer satisfaction" section (3.3.4.3.2).

Covivio has strict specifications for the construction/renovation or management of buildings, with regard to actions aimed at preventing material negative impacts on its customers through its business relationships. They ensure a level of quality and safety for customers and third parties to the operation by using virtuous solutions and materials.

As part of its management contracts for its existing hotel operating properties, Covivio contractually encourages its managers to apply health and safety regulations, and to meet the expectations and needs of customers. Please note that some contracts stipulate that non-attainment of a qualitative performance level is a reason for terminating the contract (3.3.4.3.2).

### 3.3.4.5.5 Requirement for additional CSRD data

<b>Description of the role of consumers and end-users in the activities</b>	Covivio includes future tenants in the planning and design of tertiary building developments, before construction. They are involved by participating in brainstorming workshops. As part of the renovation and construction of Covivio Hotels hotels, the managing operators and retailers are co-partners from the start of the project.
<b>The measures described above are also designed to support the achievement of one or more of the Sustainable Development Goals</b>	Covivio actively contributes to several Sustainable Development Goals established by the UN. Covivio has identified nine major SDGs in line with its targets. The actions are presented in ESRS S3, section 3.3.3.5.5.
<b>Description of internal functions involved in impact management and the types of action taken</b>	The actions implemented to meet the expectations of customers and end users are reflected in the annual review interviews with the employees concerned. The action plans are the basis for a number of objectives set in consultation with each manager at the various management levels, to ensure their success.

### 3.3.4.6 Objectives (S4-5)

Covivio has grown by forging and developing strong links with its main stakeholders. Covivio sees cooperation with its external stakeholders as a real lever for innovation and growth. The objectives have therefore been defined in order to respond as effectively as possible to the identified expectations of the customers and users of the Group's buildings. They are not currently involved in the monitoring of Covivio's performance on these issues.

The table below shows the objectives that Covivio has set itself to meet the expectations and needs of its customers and end users.

	Objective	Actions	Deadline	Progress made at the end of 2024
<b>Mobilities</b>	Accessibility to public transport: at least 95% of buildings within a 10-minute walk of public transport	Choice of qualitative locations Annual mobility study of all its European assets	Permanent	99.5% of assets are less than 1 km from public transport
	Promoting soft mobility	Installation of bicycle parking spaces, as well as electric scooters and bicycles (VAE)	Installation of charging stations for e-bikes and electric scooters	nc
	Facilitating the use of electric vehicles	Electric Vehicle Charging Infrastructure Facility (IRVE)	Analysis and ongoing deployment	nc
<b>Guarantee customer well-being</b>	100% of assets labelled for well-being	Green Key label on operating properties scope	100% by the end of 2025	90% of WiZiU assets labelled or in progress of being at the end of 2024
<b>Customer satisfaction</b>	Optimise tenant (lease) and end-user satisfaction in operating properties	End-customer satisfaction measurement	Permanent	100% of hotels are targeted for end-customer satisfaction monitoring



## 3.4 Business conduct policies and corporate culture (ESRS G1)

**The ESRS G1 standard covers the presentation of processes, procedures and more generally performance in terms of business conduct. This refers to a set of topics relating to ethics, transparency and the Company's relations with its suppliers. The challenge is to share and promote understanding of the Company's strategy and approach.**

The ESRS G1 standard also covers business ethics, the fight against corruption, the management of relations with suppliers (payment practices, etc.), the protection of whistleblowers, the corporate culture, the company's activities and commitments related to its potential political influence (lobbying, etc.).

### 3.4.1 Governance based on ethics and transparency (GOV-1)

Covivio Hotels, whose shares are listed on compartment A of Euronext Paris, is currently the leading investor in hotel real estate in Europe. Covivio Hotels has a unique hotel portfolio comprising 283 hotels located at the centre of major European cities. It currently partners with around 17 hotel chains representing some 30 brands in Europe, with a portfolio comprising 66% budget and mid-range hotels and 34% upscale hotels. Covivio Hotels supports brands in their lease, operating properties and development projects. Covivio's governance is adapted to respond effectively to the challenges of its multi-sector business model (hotel operating properties, hotels under management and retail premises). The analysis of the CSR risk mapping carried out in 2020 does not place the risks relating to governance among the most sensitive risks for the Group. Covivio Hotels plans to use increasingly effective governance and the necessary skills to meet the challenges facing the company now and in the future.

#### Respect for best practices in governance

The Supervisory Board of Covivio Hotels has adopted the Afep-Medef Code as the reference framework for the corporate governance of listed companies. This decision was published by Covivio Hotels on 30 December 2008. The company therefore complies with the Afep-Medef Code in its updated version of December 2022, which can be consulted on the HCGE website. Covivio Hotels strives to implement its recommendations.

- For more information, see Chapter 5, section 5.2: compliance with the Afep-Medef Code.

#### A balanced governance

The Supervisory Board seeks to encompass a range of skills, providing expertise in real estate, the hotel industry and finance. This diversity enables informed and independent decisions to be made on the financial statements and compliance with accounting standards. Close attention is also paid to the quality and complementarity of the career paths of the Supervisory Board's members.

The Supervisory Board has a good balance of the skills required to manage the Company effectively. The diversity within the Council is essential, because this stimulates the discussions and decisions, thereby ensuring a quick and in-depth analysis of the company's activities and challenges. The Supervisory Board has implemented a policy for appointing the members of the governing bodies to ensure this.

- For more information on the governance bodies: Chapter 5, section 5.2.1.

#### 3.4.1.1 Description of the role of the administrative, management and supervisory bodies related to the conduct of business (G1-GOV-1)

The balancing of powers is based on a separation between management and the Supervisory Board. Covivio Hotels has deployed dedicated governance to ensure that the business runs smoothly.

#### Organisation of governance for risk prevention

To reiterate, Covivio Hotels is fully incorporated into the governance of the Covivio Group, with the same management structure and decision-making processes.

In accordance with the recommendations of the AMF, the internal control system is based, in particular, on known objectives, a distribution of responsibilities, and adequate management of resources and skills.

Delegations and subdelegations of powers are in place. This delegation ensures better organisation of the company and a stronger correlation between the responsibilities of operational entities and the responsibilities of the executive. They are subject to regular reviews and audits.

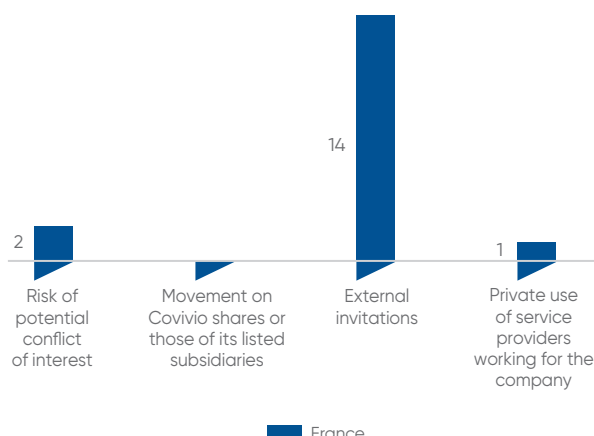
- For more information on the components of this system: Chapter 2, section 2.2.2 of the Covivio Group's URD.

The internal control of accounting and financial information is a key element of the internal control system and a key element in the conduct of the Group's business. It is described in Chapter 2, section 2.2.3.2 of the Covivio Group's URD and notably specifies the involvement of the Chief Executive Officer and the Audit Committee, as an offshoot of the Group's Board of Directors.

The Ethics Officer plays a key role in the responsibilities identified within the Group to ensure that ethical principles are respected in the conduct of business. Three Ethics Officers were appointed, one in France, one in Germany and one in Italy. Ethics Officers report exclusively to the General Management in order to ensure that their work is effective and that their actions are relevant to the organisation as a whole. He or she has a duty of confidentiality with regard to the information disclosed. Their mission includes several components:

- advising employees on conflicts of interest, gifts and other benefits in kind received or offered;
- reminder of the stock market law rules;
- verifying the application of ethical principles;
- performing regulatory oversight on the subject of ethics.

## Number of requests to Ethics Officers in 2024



A Group Compliance Officer function was created in 2018, with the support of local contacts, in order to strengthen the governance structure for risk prevention.

As part of their Group compliance duties, the Group Compliance Officer:

- is involved in drafting and updating the Ethical Charter;
- ensures that it is distributed to all employees when it is updated and to new employees when they join the company;
- is responsible for its implementation: as such, it ensures that each department implements the appropriate means to comply with the provisions which apply to it, and is supported by the Audit department to conduct the checks that are considered necessary;

- maps and updates the corruption and influence peddling risks, and ensures that the resulting recommendations are properly implemented;
- performs due diligence on third parties;
- ensures that appropriate measures are taken if these rules are breached.

### 3.4.1.2 Business conduct expertise of the administrative, management and supervisory bodies (G1-GOV-1)

The expertise of the administrative, management and supervisory bodies in terms of business conduct is a major topic for Covivio. The skills and expertise of the non-executive corporate officers are summarised in a table in Chapter 5, section 5.2.2.1.3 of this document. In addition, the training and experience of the corporate officers is present in their CVs (section 5.2.2.1.3).

The diversity of the members of the Supervisory Board enables experience of corporate governance and business conduct to be shared. 92% of them have experience of listed companies.

### Training of administrative, management and supervisory bodies in business conduct

Section 5.3.2.2.5.5 of Chapter 5 of Covivio's universal registration document presents the induction process for new Directors. It is tailored to the individual skills, experience and expertise of each of them, to enable them to gain a better understanding of the Covivio Group and its activities, and to grasp its strategic issues and priorities.

## 3.4.2 Policies related to business conduct and corporate culture (G1-1)

### 3.4.2.1 Identification of IROs related to business conduct

All information relating to the process of identifying impacts, risks and opportunities is detailed in the ESRS 2 in section 3.1.2.4.1.

#### Summary table of IROs related to ESRS G1

ESRS G1 – BUSINESS CONDUCT	
<b>Description/key words</b>	Governance and corporate culture Whistleblowing system and protection of whistleblowers Political commitment and responsible lobbying Supplier relationship management and preventive measures Corruption and conflicts of interest
<b>Main impacts</b>	Potential impact on business failures: two out of three companies pay their suppliers late; one in four bankruptcies among VSEs is caused by late payments (the leading cause of bankruptcy). It also creates tensions in employment with domino effects. Corruption mainly concerns sales, acquisition, leasing and development activities, which involve significant capital movements and regular contact between employees and local service providers, intermediaries and/or public officials.
<b>Positioning in the value chain</b>	Direct operations
<b>Main risks</b>	Risk to the relationship of trust with stakeholders who could consider the company as an at-risk partner in the event of proven corruption Market and transaction risk: this subject also covers relations with suppliers (in particular dependencies and payment terms)
<b>Main opportunities</b>	Identification of Covivio as a reliable player
<b>Materiality</b>	Material

### 3.4.2.2 Managing impacts, risks and opportunities

Promoting fair and ethical practices among all Group stakeholders is a major challenge for Covivio and addresses the "Fraud/corruption/ethics" risk identified in the CSR risk mapping. A failure to comply with the profession's ethical rules and the Group's internal procedures, or insufficient control of commercial (negotiation, contracting, invoicing, etc.) and financial processes could lead to significant risks: negative impact on reputation, loss of stakeholder confidence, financial losses, curbs on business development, etc. To counter this, Covivio has implemented numerous measures to control this risk, in accordance with the legislation of the countries in which it operates and the most widely recognised international standards in the sector. Its Ethical Charter, which serves as a Code of Conduct within the meaning of Law no. 2016-1691, known as the Sapin 2 Law, was updated in 2022; it is enforceable against its employees and covers all ethical issues that Covivio may have to face.

Covivio updated its mapping of ethics and corruption risks during 2024. This mapping was carried out with the help of an external consultant in order to ensure that the methodology was appropriate and that best practices were applied. Several workshops were held in each department to review potential risks and the measures implemented to address them, as well as to reiterate to employees what corruption can consist of and to discuss the Sapin 2 regulations.

The corruption risk mapping was shared and validated with General Management. Specific action plans have been identified to improve the control of certain risks and reduce their potential occurrence or impact.

In addition to the general risk mapping, specific analyses are carried out each year on certain subjects which may present particular risks (such as cyber risks, fraud and corruption risks and CSR risks). The Audit Committee reviewed the action plans for the main risks identified during the 2024 fiscal year (3.2.4.2), and approved the risk management policy and the 2025 audit plan. The Committee shared all these details with the Board of Directors.

#### The Ethical Charter, a driver for responsibility

Covivio's Ethical Charter is a fundamental part of its ethical and compliance approach. It is based on a common foundation and is adapted to the legal and regulatory specificities of each country, and covers all Group employees throughout Europe. It can be consulted on Covivio's websites and intranet. The Ethical Charter sets out the rules and principles that all employees must follow in their professional practices and in their dealings with stakeholders. The fundamental principles set out in this Charter are as follows: compliance with laws and regulations (prevention of insider trading, combating money laundering, corruption and any related offences, etc.); respect for the environment and for people (health and safety at work, preventing and combating acts of discrimination, respect for third parties, etc.); protection of the company's assets (reputation, property, resources, etc.); transparency of the information provided; protection of personal data. The Charter has been updated regularly: in 2015, 2018, 2022 and 2024. The new whistle blowing system was incorporated in 2024. The Ethical Charter is legally binding on Group employees and serves as a Code of Conduct within the meaning of the Sapin 2 law.

### A WiZiU Ethical Charter

The purpose of the WiZiU Ethical Charter is to define a set of principles and rules applicable to the Company and also serves as a Code of Conduct within the meaning of Law No. 2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of economic life, known as the Sapin 2 law. This charter, drawn up in 2018, was updated in 2024. It applies to hotels operated by WiZiU or under franchise agreements, or even under white label agreements. It deals with topics that are common with those of the Group: discrimination, harassment, corruption, influence peddling, gifts policy, conflict of interest. Nevertheless, several subjects are specific to the hotel business and justify the need to have a charter dedicated to this activity. The specific provisions concern in particular:

- money laundering linked to cash payments;
- the fight against fraud (related to payments received);
- the fight against prostitution, pimping and paedophilia;
- management of customer confidentiality (data and their images);
- food safety and hygiene.

The Charter specifies that the partners of hotels (operators, suppliers and, more generally, any person with whom the company is required to do business) are expected "to behave ethically in accordance with the spirit of this Charter, particularly in the areas concerning respect for the individual, working conditions and the fight against corruption".

Each hotel manager is responsible for ensuring that the Ethical Charter is properly understood and applied.

### 3.4.2.3 Develop, promote and assess the company's culture

#### Covivio's corporate culture and its purpose

Covivio aims to be consistently committed and ambitious, agile and collaborative, solid and human, towards all its stakeholders. The Group's reputation has been built on respect for these values on a daily basis, with a strong emphasis on compliance with regulations and ethical principles. In keeping with these values and its culture of commitment, Covivio set out its Purpose in 2019: "Building well-being and lasting ties". A true mainstay, it now guides the majority of the Group's strategic and operational choices.

Covivio's Purpose is part of a long-term vision. It is inspired by the Group's mission: to capitalise on solid know-how in long-term partnerships and on the ability to create living spaces that offer a unique experience and contribute to the emergence of more sustainable, resilient and inclusive real estate and cities.

Several initiatives have been set up to promote the company's values. The Ethical Charter is included in the onboarding programmes for 100% of head office employees. It is handed to employees with the Internal Regulations. The Risk, Compliance, Audit and Internal Control department organises training sessions called "Process Mornings" to strengthen awareness of these issues. They are used to explain the internal control systems and the Ethical Charter.

## Employer Brand

The employer branding policy introduced in 2019 as part of the change of identity is also being pursued at the European level through the coordination of the three already-formed ambassador groups. They lend their image and their voice to Covivio's employer brand, and represent the Group and its business lines on social networks and at forums organised by schools. 53 ambassadors help promote Covivio both internally and externally in Europe, by taking part in school forums or after-work events organised with students. They also play an active role on social networks, sharing Covivio posts and job offers available within the Group. As such, they receive regular training on using social media and have access to a dedicated resource platform (Teams group and ambassador booklet).

## Commitment assessment

Covivio conducts an internal barometer survey every two years to assess the mindset of its teams. The 2023 results confirmed the company's strong in-house culture at European level and the employees' strong attachment to the company.

Team commitment and pride in belonging are high: 93% of employees say their work is interesting, and 85% of them are satisfied with their job, 12 points higher than the Kantar Institute benchmark for private companies. Confidence in the Group's strategy and management remain at high levels: 78% of employees say they have confidence in the management team (+15 pts compared to the benchmark) and 83% in their direct line manager. 94% of employees say they are optimistic about Covivio's future. The organisational efficiency within the Group is singled out for praise in this survey: 81% of employees state that decisions are taken quickly and 80% are pleased with the speed at which they are implemented. The quality of life at work is also highly praised: 90% consider that the working atmosphere is good within their team and 80% say that they have a good work-life balance. 91% of employees are satisfied with their material working conditions.

The results of the Barometer were presented to the CSR Committee at the meeting of 21 September 2023 as well as to Covivio's Board of Directors.

### 3.4.2.4 Mechanisms for identifying, reporting and monitoring practices that breach the principles of the Ethical Charter

#### Ethics and the fight against fraud and corruption, the cornerstones of Covivio's governance

Ethics and the fight against fraud and corruption are part of the cornerstones of Covivio's governance. To help achieve this, Covivio has introduced numerous risk management measures in accordance with the legislation of the countries in which it operates and the most widely recognised international standards in the sector. Its Ethical Charter, which serves as a Code of Conduct within the meaning of the Sapin 2 law, is enforceable against its employees and covers all the ethical issues that Covivio may face.

The Charter in particular highlights Covivio's "zero tolerance" policy on corruption and influence peddling, and the ability for any (internal or external) stakeholder to report any action which is contrary to the principles of the Charter through the whistleblowing system, via the Group Whistleblowing platform. In 2024 (as in 2023), there were no disciplinary actions against any employees for failure to comply with the Ethical Charter.

Furthermore, Covivio has not received any complaints or been the subject of any convictions on these grounds.

Covivio has implemented the 8 measures for preventing the risks of corruption and influence peddling covered by the Sapin 2 law.

#### 1) Corruption risk mapping

The cornerstone of Covivio's corruption risk prevention system, the mapping of corruption risks is regularly updated to stay abreast of changes in the Group's activities. It was updated in 2024. The recommendations arising from the mapping are implemented at European level by the Compliance Officers and are subject to regular monitoring by the Audit Committee and by the Management Committees of each country.

#### 2) 3) Procedures for assessing the situation of customers and suppliers and accounting control procedures

In view of the major risks identified by the mapping, Covivio is particularly vigilant about the trustworthiness of its main customers and suppliers, and carries out appropriate analyses, and implements specific accounting controls aimed at detecting acts of fraud and corruption in its accounts. Furthermore, transactions which are regarded as being sensitive, such as the purchase or sale of buildings or companies, and construction or renovation work, are subject to appropriate procedures, particularly concerning knowledge of intermediaries. Covivio uses a dedicated platform (in addition to EcoVadis, ESRS S2, section 3.3.2.5) to carry out a due diligence on suppliers identified as being at risk by the corruption risk mapping. This platform analyses the trustworthiness of the companies concerned, their legal representatives and their subsidiaries. This analysis lists potential international sanctions, any negative press and indicates the politically exposed persons.

#### 4) 5) Code of conduct and disciplinary procedures

Covivio's Ethical Charter has been updated in accordance with the requirements of the Sapin 2 law in order to serve as a Code of Conduct. In France, it is annexed to the company's Internal Regulations, and it has a similar binding force in Germany and Italy. Non-compliance with its provisions, and in particular any proven act of corruption or influence peddling, will result in strict sanctions, which can include termination of the employment contract or the term of office of the person in question.

#### 6) Whistleblowing system

Covivio Hotels has had an internal whistleblowing system since 2015. Its functioning has been modified to take the provisions of the Sapin 2 law into account. The facts liable to be covered by the whistleblowing system are many and varied: serious or more minor offences, gross and flagrant violations of national or international regulations, serious threats or harm to the general interest. It also allows any stakeholder to report breaches of the principles set out in the Ethical Charter and in the following areas in general: finance, accounting, banking, the fight against corruption, the fight against discrimination and harassment in the workplace. The whistleblowing system is available to Group employees as well as to all stakeholders. It is the subject of an internal procedure that is publicised and explained at the Europe-wide level. Partners and suppliers are also informed of its existence via the Covivio website and the reference to it in the Responsible Purchasing Charter (ESRS S2, section 3.3.2.2.1) instituted in France. A new Whistleblowing platform was set up in France, Germany and Italy, at the end of 2023,



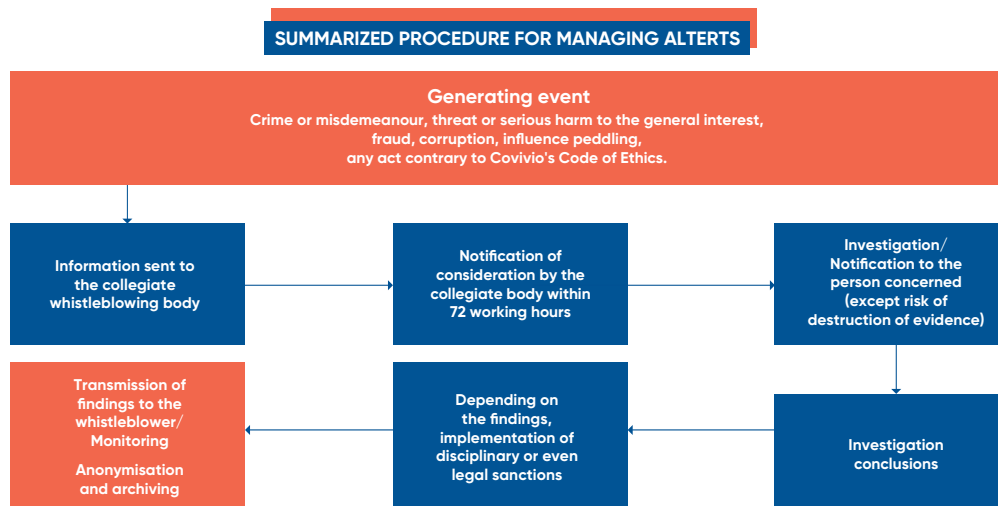
Covivio is committed to protecting the whistleblower:

- by keeping his or her identity confidential;
- against possible reprisals, disciplinary sanctions or legal action, provided that the alert is not made maliciously and is made in good faith.

The Whistleblowing platform also enables any misconduct to be reported anonymously. Anonymous alerts are investigated if the gravity of the reported facts is established and the facts are

sufficiently detailed. The whistleblowing procedure was updated in 2024 to take changes in the law aimed at strengthening the protection of whistleblowers into account. After the internal investigation into the alert has ended, and provided that it has not resulted in any legal and/or disciplinary action, Covivio will anonymise all the data collected within 2 months and will only keep an Excel file which contains no personal data. This file is exclusively intended to analyse the system. In 2024, no alert was launched under this system.

### Summary procedure for managing alerts



The investigation is carried out by the relevant whistleblowing investigation body. This is an internal Covivio body that constitutes the first stage of the reporting process. It is independent. It guarantees the confidentiality of the identity of the whistleblower' as well as the person implicated. It has a duty of confidentiality with regard to the information disclosed. It can be seized by any means available to the staff as well as by third parties (service providers, commercial partners, suppliers, customers, etc.), notably *via* the platform. Covivio's whistleblowing body is composed of the following people: the Chief Operating Officer and the Audit and Internal Control Director, who may enlist the services of any appropriate persons to carry out their investigations.

### 7) Employee training

The Risk, Compliance, Audit and Internal Control Department has put in place regular and compulsory training courses, which are provided to all employees. These training sessions, called "Process Mornings", focus on compliance with the cybersecurity and data protection rules, raise awareness of the principles of the Ethics Charter (combating corruption and influence peddling, the Group's gift and invitations policy, the whistleblowing system) as well as a reminder of procedures. This practice, initiated in France, has been rolled out to all Group employees in Europe. The Ethical Charter is also handed to each new employee when they join the Group.

### 8) System for monitoring and assessing the measures implemented

The Audit Department carries out regular checks, as part of the annual audit plans ratified by the Audit Committee, to ensure that measures to prevent the risk of corruption are being properly applied.

### Prevention of the risk of fraud:

In accordance with the regulations and the provisions of the Global Compact's 10<sup>th</sup> principle, Covivio ensures that its risk prevention measures are properly applied in relation to fraud, corruption and related offences, such as influence peddling. The separation of scheduling (the order) and launch (the payment) operations, as well as the procedures linked to the competitive bidding thresholds, significantly reduce the risk of fraud. The company informs employees in charge of transactions about the risk of fraud and corruption, during "Process Mornings", and reminds them of the "zero tolerance" level which applies within the Group. "Anti-fraud" audits are regularly carried out within the Group. In the context of the audit plans approved by the Audit Committee, these measures are subject to internal control and assessment.

### Ensure fair competition:

Covivio and its subsidiaries undertake to comply with the provisions of the competition laws in force in each country during their business activities, and more specifically during sales, acquisitions and construction processes. The company has therefore set up appropriate procedures: for example, competitive bidding is compulsory above certain thresholds, and the framework for calls for tenders is defined by procedures drawn up and approved by the General Management. Several companies may have to be consulted, depending on the amounts and types of transactions. Similarly, a bid opening procedure, involving at least two employees and a bid opening report has been introduced for certain calls for tenders, in order to ensure maximum transparency and competition. Audits are regularly performed to check compliance with internal procedures in this area. The risk of anti-competitive (or antitrust) is limited in the context of the Group's activities, as the ownership of real estate assets is widely dispersed.



### Combating money laundering:

Covivio, as a real estate company, is subject to anti-money laundering legislation in its activities of letting, business domiciliation, buying and selling of buildings, businesses, shares or stakes in real estate companies, which could conceal one or more money laundering activities subject to criminal prosecution. As it carries out transactions involving movements of capital, Covivio is also required to report any suspicious transactions it is aware of to the Public Prosecutor. Covivio and its subsidiaries have implemented a comprehensive anti-money laundering and counter-terrorist financing (AML/CTF) system, adapted to specific national statutory and regulatory requirements, in the form of a procedure that identifies and describes the actions to be carried out by the employees responsible for the operations concerned. The Group Compliance Officer as well as the Risk, Compliance, Audit and Internal Control Director are "AML/CFT" Managers and TRACFIN Correspondents and Declarants. The system is based on due diligence from the start of the business relationship and with respect to the third parties concerned. The implementation of the AML/CFT system is supported by regular training campaigns during "Process Morning" training sessions.

WiZiU has set up a whistleblowing system. This system is in-house and is only intended for WiZiU employees. It complements other existing communication channels. This system guarantees the protection of whistleblowers, in accordance with the provisions of the Sapin 2 law.

### 3.4.2.5 Business-related training

Consistent with the obligations of the Hoguet Act, which regulates the conditions for working in the real estate sector, Covivio organises training for the employees concerned. They are holders of the management and/or transaction card or of Hoguet law certificates. The 28 people concerned by this obligation attended training courses in 2024. These courses represent a volume of 42 hours spread over 3 years and include modules on business ethics.

Covivio is offering all Group employees the opportunity to take part in awareness-raising initiatives or training courses on cyber risks, emphasising the best practices and behaviour to adopt. To ensure that these actions are successful, phishing tests are regularly organised internally.

Covivio's intranet site provides all head office employees with easy access to all current charters, regulations and procedures. In addition, face-to-face training sessions ("Process Mornings") are organised for these employees to reaffirm good practices and provide links to documentation and procedures.

### 3.4.2.6 Description of the functions most exposed to corruption

Corruption risk mapping has enabled the most at-risk functions to be identified. These are the functions responsible for works and works contracts when selecting suppliers and contractors, as well as the functions and employees in charge of public and institutional relations involved in administrative applications to the public authorities.

These functions are subject to strict procedures in order to ensure that these risks are controlled properly. Controls and audits are also carried out regularly to ensure that the processes are properly complied with.

The company informs its employees who are in charge of transactions about the risk of fraud and corruption, during "Process Morning Meetings", and reminds them of the Group's zero-tolerance policy.

### 3.4.2.7 Additional CSRD data requirement (G1-1)

<b>Processing of incident reports</b>	In accordance with the procedure mentioned in section 3.4.2.4, Covivio undertakes to investigate incidents related to the conduct of business quickly, independently and objectively. Covivio undertakes to promptly, independently and objectively investigate incidents related to the conduct of business.
<b>Animal welfare</b>	This issue did not appear in the double materiality analysis given Covivio's activities. However, this subject is often included by hotel operators as part of more global initiatives related to responsible food. This is notably the case with the implementation of the Green Key label that Covivio Hotels is rolling out to all of its directly managed hotels.
<b>Legal requirements for the protection of whistleblowers</b>	Covivio applies the provisions of Law No. 2022-401 of 21 March 2022 aimed at improving the protection of whistleblowers, and they were included in Covivio's new whistleblowing procedure launched in January 2024.



### 3.4.3 Supply chain and payment practices (G1-2)

#### 3.4.3.1 Policies to prevent late payments

Covivio's Responsible Purchasing Charter promotes a responsible relationship with its business partners. This Charter is based on the principles of the United Nations Global Compact, the Diversity Charter and the International Labor Organization (ILO) and promotes Covivio's ethical values. They are primarily aimed at respecting payment deadlines for suppliers and consultants, combating corruption and influence peddling, money laundering and anti-competitive practices, limiting economic dependence and preventing conflicts of interest.

#### 3.4.3.2 Responsible Purchasing Policies

Covivio is committed throughout the life cycle of its assets (design, operation, deconstruction) to prioritising suppliers and consultants who aim to:

- improve, through the products or services offered, the environmental performance (energy, carbon, biodiversity) of assets under construction, renovation, management or occupied by Covivio teams;
- promote social and societal actions;
- show themselves to be very trustworthy;
- help to control budgetary expenditure by calculating the indirect costs of the products or services offered, in addition to the direct costs.

Besides its Responsible Purchasing Charter, Covivio also uses Ecovadis to assess the CSR performance of its suppliers.

Details of Covivio's commitments in terms of the choices, requirements and quality of the dealings with its suppliers are detailed in the Responsible Purchasing Charter, presented in ESRS S2, section 3.3.2.1.

### 3.4.4 Preventing risks of corruption and bribery (G1-3)

In accordance with the regulations and the 10<sup>th</sup> principle of the Global Compact, Covivio has strengthened its risk prevention system against fraud, corruption and similar offences, such as influence peddling.

The fight against corruption and bribery is an integral part of the principles of the Covivio Ethical Charter. The eight measures to prevent the risks of corruption and influence peddling governed by the Sapin 2 law are detailed in the ESRS G1, section 3.4.2.4.

#### Alert management

In the event of a whistleblowing alert, the whistleblowing body conducts the investigation (see above). After investigating, and in view of the evidence in its possession, the body concludes whether the allegations are founded or not.

If the allegations are unfounded, the investigative body will remove all documents used in its investigation within a maximum of two months and will only keep an Excel file which will contain no names, except in the event of a judicial action. The sole purpose of this file is to analyse the system. The person who is the subject of an alert cannot obtain disclosure of the whistleblower's identity, based on their right of access, under any circumstances. The investigative body archives the anonymised data immediately after the end of the investigation for statistical processing.

If the allegations are substantiated, disciplinary or even legal action will be taken with the support of the Human Resources Department and the competent legal authorities, as appropriate.

#### Training

Regular and mandatory training sessions called "Process Mornings", delivered to 100% of employees, warn them against corruption and the payment of bribes. They are detailed in the section 3.4.2.3. The Group's "zero tolerance" policy is reiterated during these sessions. Special attention is focused on employees responsible for transactions that may present a risk of fraud or corruption. The anti-corruption and anti-bribery training sessions are organised and run by the "Risks, Compliance, Audit and Internal Control" Department, whose Director reports directly to the Group's Chief Executive Officer.

In addition, Covivio's Ethical Charter is handed to each new employee when they join the Group.

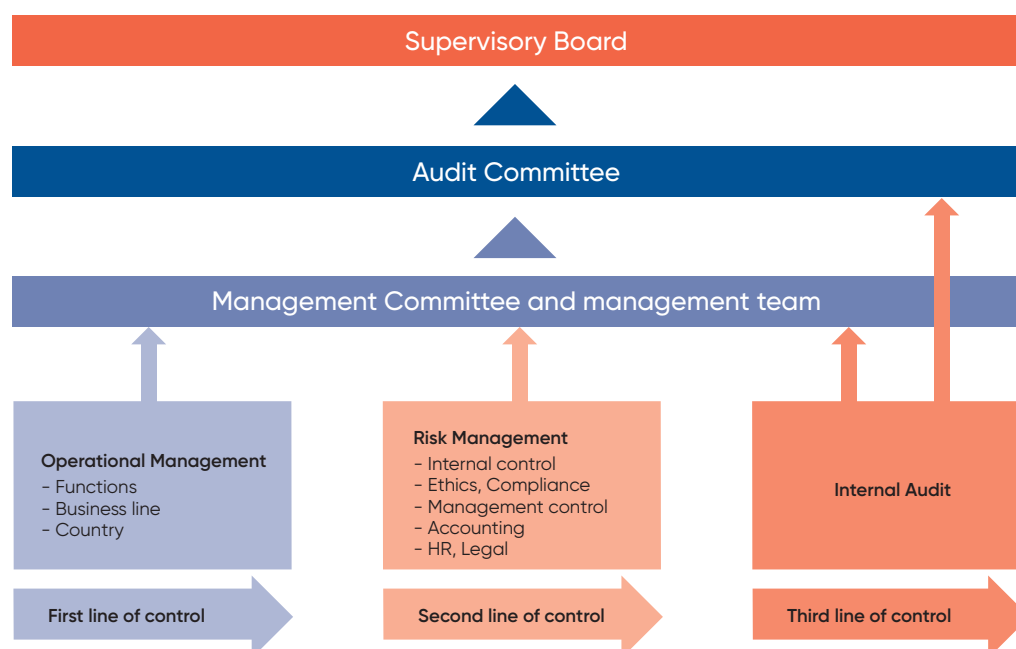


### 3.4.5 Business conduct metrics (G1-4)

#### 3.4.5.1 Action plan and resources

##### Levels of control and stakeholders

The system is based on the lines of control presented below:



As a reminder, Covivio Hotels is supported by the Covivio Group's centralised departments, in particular Audit, Ethics and Compliance, Accounting, Cash Management, Sustainable Development, Legal, HR, etc.

In addition to the general risk mapping and specific analyses that are conducted annually on topics that may pose special risks (such as cyber risks, Fraud and Corruption and CSR risks), the Board of Directors reviewed the action plans implemented for the main risks identified during the 2024 fiscal year and approved the risk management policy and the 2025 audit plan.

##### Action plan

Actions implemented	Time horizon considered	Target audience	Resources allocated
Ethical Charter	Update according to changes in legislation and Covivio policies	All employees and contractual relationships	Risk Management Department, ACI Ethics officer Compliance officer General Management Whistleblowing platform
Training	Training at least every two years	All employees	Risk Management Department, ACI If necessary, external provider E-learning platform Edflex
Responsible procurements	Permanent staff: Calls for tenders and during the signing of contracts	Suppliers > €200 thousand (€50 thousand on corporate expenses) All purchasing employees	Sustainable Development Department EcoVadis Altarex
KYC (verification of the identity and integrity of customers)	At each signature	Tenants, buyers, sellers during acquisitions and asset sales.	Compliance Trustworthiness platform
Procedures	Update according to changes in the legislation or Covivio's organisation	All employees and contractual relationships	Risk Management Department, ACI

Given the absence of any breach of the principles of the Ethical Charter, no remedial measures have been implemented. As a reminder, failure to comply with the rules laid down in the charter, and in particular any act of corruption, may, in addition to legal consequences, result in strict disciplinary action, including termination of the employment contract or term of office of the person concerned.

### 3.4.5.2 Metrics

#### Monitoring of infringements

	2023	2024
Number of convictions for violation of anti-corruption and anti-bribery laws	0 No convictions	0 No convictions
Amount of fines for violation of anti-corruption and anti-bribery laws	0 No fine	0 No fine
Number of confirmed incidents of corruption or bribery	0 No incidents of corruption	0 No incidents of corruption
Information on the nature of confirmed cases of corruption or the payment of bribes	Not applicable	Not applicable
Number of confirmed cases resulting in the dismissal or disciplinary actions against workers for corruption or the payment of bribes	0 No cases	0 No cases
Number of confirmed cases of contracts with commercial partners that were terminated or not renewed due to violations related to corruption or the payment of bribes	0 No cases	0 No cases
Information on the court cases concerning corruption or bribery brought against the company and its own workers and on the outcome of such cases	0 Not applicable	0 Not applicable

### 3.4.6 Interest representation and lobbying (G1-5)

Covivio has a special procedure for the following activities:

- the companies' involvement in donations (including sponsorship, patronage), memberships or contributions to professional or non-professional associations or foundations;
- lobbying (representation of interests)/public relations, if a specialised firm is used.

This procedure is based on the principle that, while respecting the commitments of its employees who, as citizens, participate or wish to participate – in a private capacity – in public life, Covivio does not finance any public official, political party, holder of public office or candidate for public office, or any trade union or religious organisation which is not recognised as being in the public interest.

The Corporate Foundation, founded in 2020 is responsible for any donations, patronage, sponsorship and similar operations related to equal opportunities. All other actions are coordinated by the Communications Department, which refers the request for due diligence to the Compliance Officer prior to final approval of the project by the General Management.

The membership of professional associations by Covivio employees (whose subscriptions are paid by the company) is also subject to internal validation processes. The Compliance Officer may be asked to conduct a preliminary integrity investigation.

Covivio may also join professional associations that represent interests, or occasionally hire specialised firms who are subject to special oversight and strict application of Covivio procedures.

All requests to use such a firm are sent to the Institutional Relations Director, who, supported by the Compliance Officer, carries out the following procedures:

- checks that the specialised firm complies with the ethical rules and principles laid down by Law No. 2013-907 of 11 October 2013 on transparency in public life;

- obtains any document from the proposed firm certifying compliance with these rules, in particular via the signature of a Code of Conduct (e.g. the Charter of the French Association of Lobbying and Public Affairs Consultants);
- verifies that the Firm is properly registered in the Directory of Interest Representatives provided by the High Authority for Transparency in Public Life;
- formalises, as part of the drawing up of the contract, the missions of the firm and establishes an hourly rate-based remuneration structure: written activity reports and formal appointment reports;;
- ensures that the contract includes the obligations stipulated in Article 18-5 of Law No. 2013-907 of 11 October 2013 on transparency in public life, and more specifically prohibits:
  - giving gifts of any kind to a public official, to one of his or her relatives or agents, regardless of the amount,
  - paying a public official to attend a conference,
  - attempting to obtain information by fraudulent means,
  - selling the information or documents he obtains from a public official.

If he considers it necessary, the Compliance Officer may carry out background checks on the proposed firm, and submit the results to the General Management, which is the only body authorised to sign this type of contract.

No member of the Board of Directors of Covivio or the Supervisory Board of Covivio Hotels has previously held a similar position in public administration within two years of their appointment. The CVs of the Directors are reported in Chapter 5, section 5.3.2.1.3 of Covivio's Universal Registration Document and in Chapter 5, section 5.2.2.1.3 of this Covivio Hotels Universal Registration Document.

## Involvement in national or international organisations

Covivio as a Group and on behalf of its subsidiaries (Hotels, Development, etc.) actively contributes to public building policy through its strong commitments within working groups and professional associations. Covivio is a member of the Fédération des Entreprises Immobilières (FEI), and Jean-Eric Fournier, Covivio's Sustainable Development Director is the Chairman of its CSR Commission. He is also Vice-Chairman of the Alliance HQE-GBC France, member of the Board of Directors of the Orée association, of the Bureau du Plan Bâtiment Durable, and leader

of the Professional Sustainability group of RICS France. Covivio's involvement in various working groups in connection with associations (Alliance HQE-GBC, Orée, SBA-Smart Building Alliance, etc.) and with scientific organizations (Politecnico di Milano, etc.), its participation in studies (Palladio, IFPEB, etc.), its role as a supporter of TCFD and TNFD and its commitment to the Global Compact or the Diversity Charter, all demonstrate the Group's strong commitment to sustainable real estate.

	2023	2024	Observations
<b>Political, financial or in-kind contributions</b>	0 None	0 None	Covivio does not support any political party
<b>Amount of direct internal and external lobbying expenses</b>	0	0	Declaration of elected contacts in an annual register
<b>Amount paid for membership of lobbying associations</b>	€184K	€184K	Limited to professional associations: Afep, FEI and EPRA
<b>Description of how the monetary value of in-kind contributions is estimated</b>	Not applicable	Not applicable	Covivio does not support any political party

## 3.4.7 Supplier payment terms (G1-6)

Covivio is aware of the impact of payment practices on the financial health of its suppliers, especially the smallest organisations, and makes every effort to respect the contractually agreed payment terms. Its payment procedures are structured in accordance with the Law on the Modernisation of the Economy (LME) of 4 August 2008, which governs payment terms. These are explained in Chapter 1, section 1.4.1.7. of Covivio's Universal Registration Document. The data presented below only cover the Covivio – France scope and not the entire Covivio Hotels scope.


<b>Payment terms metrics</b>	2024	Observations
<b>Covivio France scope</b>		
Average number of days to pay an invoice from the date on which the contractual or legal payment period begins to be calculated	22 days	Section 1.4.1.7. of Covivio's Universal Registration Document
Description of the Company's standard payment terms in number of days by main supplier category	Group payment terms: transfer within 30 days Exception for "fluids" (EDF, Orange, etc.): direct debit possible	Section 1.4.1.7. of Covivio's Universal Registration Document
Percentage of payments compliant with standard payment terms	86% of invoices are paid within 30 days or less (date of receipt)	Section 1.4.1.7. of Covivio's Universal Registration Document
Number of ongoing legal proceedings for late payments	None	Section 1.4.1.7. of Covivio's Universal Registration Document



## 3.5 CSR performance







### 3.5.1 Cross-reference table

#### 3.5.1.1 Multi-reference tables

ESRS	DP CSRD	EPRA	GRI	ISSB STANDARDS	TNFD	SDGS
ESRS 2	<b>GOV-1</b> 3.1.2.2.1 3.1.2.2.2	Gov-Board	2-9, 2-11	S2.6 (a), (b) S1.21 (b)	Governance A, Governance B	  
	<b>GOV-2</b> 3.1.2.2.2		2-12, 2-13, 2-16, 2-24		Governance A, Governance B, Governance C	
	<b>GOV-3</b> 3.1.2.2.4		2-19, 2-20	S2.6 (a) (v), S1.21 (b), S2.22 (b) (i), (ii) S2.29 (g) (i), (ii)	Governance A	
	<b>GOV-4</b> 3.1.2.2.5		2-23		Governance C	
	<b>GOV-5</b> 3.1.2.2.5		2-14		Governance A	
	<b>BP-1</b>		2-2, 3-1			
	<b>BP-2</b>		2-4	S2.10 (d)		
	<b>SBM-1</b> 3.1.2.3.1		2-6, 2-7, 2-22, 3-3		Risk and impact management (ii)	
	<b>SBM-2</b> 3.1.2.3.2		2-12, 2-29		Governance C	
	<b>SBM-3</b> 3.1.2.3.3		3-2, 3-3, 201-2, 306-1	S2.10 (a), (c), S2.13 (a), (b), S2.14 (a), S2.15 (a), (b), S2.16 (a), (b), (c), (d), S2.25 (b)	Governance C, Strategy A-D Risk and impact management (ii), Metrics and targets B	
	<b>IRO-1</b> 3.1.2.4.1		2-14, 3-1	S2.25 (a), (b), (c)	Governance B-C Strategy A/D Risk and impact management A (i), (ii), B, C	
	<b>MDR-A</b> 3.1.2.5			S2.14 (a), (c), S2.25 (a) (v)	Strategy B, C, Metrics and targets B	
	<b>MDR-M</b> 3.1.2.5				Metrics and targets A-B	
	<b>MDR-P</b> 3.1.2.5				Governance B, C, Strategy B, Metrics and targets B	
	<b>MDR-T</b> 3.1.2.5			S2.29 (a) (iii) (1-3), S1.50 (c), S2.33, S2.B67, S2.33, S2.34, S2.35,	Strategy B, Metrics and targets C	
<b>Sector-related issues</b>		Cert-tot				

ESRS	DP CSRD	EPRA	GRI	ISSB STANDARDS	TNFD	SDGS
<b>E1 Climate change</b>	<b>E1-1</b> 3.2.1.1		201-2	S2.10 (b), S2.14 (a), (c), S2.22 (a), (b) S1.23, S1.B42 (c), S2.25 (a), (b), S2.29 (e)	Strategy B, Metrics and targets C	   
	<b>E1-2</b> 3.2.1.2		3-3	S2.25 (a), (b), S2.33 (e), (g), S2.36 (a), (b)	Strategy B, Risk and impact management B	
	<b>E1-3</b> 3.2.1.3		3-3, 305-5	S2.14 (a), (b)	Strategy B, C	
	<b>E1-4</b> 3.2.1.4		3-3, 305-1, 305-2, 305-3, 305-5	S2.14 (a) (ii-iii), S2.33, S2.34 (a), S2.36 (a), (b), (d)	Strategy B	
	<b>E1-5</b> 3.2.1.5	Elec-Abs Elec-LfL, DH&C-Abs DH & C-LfL, Fuels-Abs, Fuels-LfL, Energy-Int	302-1, 302-2, 302-3, 302-4, 302-5	S2.29 (a) (i) (3), S2.B38-B57, S2.29 (a) (ii), (iii) (1-3), S2.B19		
	<b>E1-6</b> 3.2.1.6	GHG-Dir-Abs, GHG-Indir-Abs, GHG-Int	305-1, 305-2, 305-3	S2.29 (a), S2.B38 – B57, S2.29 (a), S2.B30, S2.B31, S2.B32, S2.B56 (a), (b), S2.B34		
	<b>E1-7</b> 3.2.1.7			S2.36 (e)		
	<b>E1-8</b> 3.2.1.8			S2.29 (f), S2.36 (e) (iii)		
	<b>E1-9</b> 3.2.1.9		201-2	S2.25 (b), S2.29 (b-d)		
<b>E2 Pollution</b>	<b>E2-1</b> 3.2.2.2		3-3		Strategy B, Risk and impact management B	 
	<b>E2-2</b> 3.2.2.4		3-3		Strategy B, Strategy C	
	<b>E2-3</b> 3.2.2.5		3-3, 303-2		Strategy B, Metrics and targets C	
	<b>E2-4</b> 3.2.2.6				Metrics and targets B	
	<b>E2-6</b> 3.2.2.6				Strategy B-C, Metrics and targets A	
<b>E3 Water and marine resources</b>	<b>E3-1</b> 3.2.3.2		3-3		Strategy B, Risk and impact management B	  
	<b>E3-2</b> 3.2.3.3		3-3, 303-1, 303-4		Strategy BC, Metrics and targets C	
	<b>E3-4</b> 3.2.3.4	Water-Abs Water-LfL, Water-Int	3-3, 303-3, 303-5		Metrics and targets B	
	<b>E3-5</b> n.a				Strategy B, Metrics and targets A	
<b>E4 Biodiversity and ecosystems</b>	<b>E4-1</b> 3.2.4.1		3-3		Strategy C	  
	<b>E4-2</b> 3.2.4.2		3-3		Governance C, Risk and impact management B	
	<b>E4-3</b> 3.2.4.3		3-3, 304-3		Governance C, Strategy C	
	<b>E4-4</b> 3.2.4.4		3-3, 304-3		Metrics and targets C	
	<b>E4-5</b> 3.2.4.5		304-1, 304-2, 304-4		Metrics and targets B	
	<b>E4-6</b> 3.2.4.6				Strategy C, Metrics and targets A	

ESRS	DP CSRD	EPRA	GRI	ISSB STANDARDS	TNFD	SDGS
<b>E5</b> Circular economy	<b>E5-1</b> 3.2.5.2		3-3		Risk and impact management B	  
	<b>E5-2</b> 3.2.5.3		3-3, 306-2		Strategy C	
	<b>E5-3</b> 3.2.5.4		3-3		Metrics and targets C	
	<b>E5-4</b> 3.2.5.4.3		301-1, 301-2, 306-1		Metrics and targets B	
	<b>E5-5</b> 3.2.5.5	Water-Abs Waste-Lfl	306-3, 306-4, 306-5		Metrics and targets B	
<b>S1</b> Own workforce	<b>S1-1</b> 3.3.1.1	Diversity-Emp	2-23, 2-25, 2-29, 3-3, 404-2, 405-1, 407-1, 408-1, 409-1			  
	<b>S1-2</b> 3.3.1.3		2-29, 3-3, 402-1, 407-1			
	<b>S1-3</b> 3.3.1.3.2		2-25, 2-26, 403-2			
	<b>S1-4</b> 3.3.1.4		2-24, 3-3, 403-1, 403-9, 403-10			
	<b>S1-5</b> 3.3.1.5		3-3			
	<b>S1-6</b> 3.3.1.5.2	Diversity-Emp, Diversity-Pay, Emp-Training, Emp-Dev, Emp-Turnover, H & S-Emp	2-7, 401-1, 403-2, 403-9, 403-10, 404-1, 404-3, 405-1, 405-2			
	<b>S1-7</b> 3.3.1.5.7		2-8			
	<b>S1-8</b> 3.3.1.5.8		2-30			
	<b>S1-11</b> 3.3.1.5.4		403-3			
	<b>S1-14</b> 3.3.1.5.7		403-3, 403-8			
	<b>S1-15</b> 3.3.1.5.5		401-3			
	<b>S1-16</b> 3.3.1.5.2		2-21, 405-2			
	<b>S1-17</b> 3.3.1.5.6		2-27, 406-1			
<b>S2</b> Workers in the value chain	<b>SBM-3</b> 3.3.2.1		408-1, 409-1			   
	<b>S2-1</b> 3.3.2.2		2-23, 2-25, 2-29, 3-3			
	<b>S2-2</b> 3.3.2.3		2-29, 3-3			
	<b>S2-3</b> 3.3.2.4		2-25, 2-26			
	<b>S2-4</b> 3.3.2.5		2-24, 3-3, 308-1, 403-7, 414-1			
	<b>S2-5</b> 3.3.2.6		3-3			
<b>S3</b> Affected communities	<b>SBM-3</b> 3.3.3.1		203-2, 204-1, 411-1, 413-2		Governance C	   
	<b>S3-1</b> 3.3.3.2		2-23, 2-25, 2-29, 3-3, 203-1, 413-1		Governance C	
	<b>S3-2</b> 3.3.3.3	Comty-Eng	2-29, 3-3			
	<b>S3-3</b> 3.3.3.4		2-25, 2-26			
	<b>S3-4</b> 3.3.3.5		2-24, 2-25, 3-3		Strategy B	
	<b>S3-5</b> 3.3.3.6		3-3			

ESRS	DP CSRD	EPRA	GRI	ISSB STANDARDS	TNFD	SDGS
<b>S4 Consumers and end-users</b>	<b>S4-1</b> 3.3.4.2	H & S-Asset, H & S-Comp	2-23, 2-25, 2-29, 3-3			   
	<b>S4-2</b> 3.3.4.3		2-29, 3-3			
	<b>S4-3</b> 3.3.4.4		2-25, 2-26, 418-1			
	<b>S4-4</b> 3.3.4.5		2-24, 2-25, 3-3, 416-1			
	<b>S4-5</b> 3.3.4.6		3-3			
<b>G1 Business conduct</b>	<b>GOV-1</b> 3.4.1		2-9, 2-12, 2-15, 405-1			 
	<b>G1-1</b> 3.4.2.7		2-13, 2-16, 2-23, 2-24, 2-26, 3-3, 206-1			
	<b>G1-2</b> 3.4.3		3-3		Strategy B	
	<b>G1-3</b> 3.4.4		2-26, 3-3, 205-2			
	<b>G1-4</b> 3.4.5		2-27, 205-3			
	<b>G1-5</b> 3.4.6		2-28, 3-3, 415-1		Governance C	
<b>Chap 2</b>			2-17, 2-18			
<b>Chap. 5</b>		Gov-Select, Gov-COI	2-10, 2-11, 2-12, 2-13, 2-15			

The material ESRS for Covivio Hotels are presented in ESRS 2, section 3.1.2.3.3.



### 3.5.1.2 SASB Index – RealEstate Standard

#### Sustainability Disclosure Topics & Accounting metrics

Topic	Accounting Metric	Category	Unit of Measure	Code	Hotels/ Europe
<b>Energy Management</b>	Energy consumption data coverage as a percentage of total floor area, by property subsector	Quantitative	% by floor area	IF-RE-130a.1	3.2.1.5
	Total energy consumed by portfolio area with data coverage, percentage grid electricity, and percentage renewable, by property subsector	Quantitative	kWh,%	IF-RE-130a.2	3.2.1.5
	Like-for-like percentage change in energy consumption for the portfolio area with data coverage, by property subsector	Quantitative	%	IF-RE-130a.3	3.2.1.5
	Percentage of eligible portfolio that has an energy rating and is certified to energy performance standards, by property subsector	Quantitative	% by floor area	IF-RE-130a.4	3.2.1.5
	Description of how building energy management considerations are integrated into property investment analysis and operational strategy	Discussion and analysis	N/A	IF-RE-130a.5	3.2.1.1.2.a3. 2.1.1.3
<b>Water Management</b>	Water withdrawal data coverage as a percentage of total floor area and floor area in regions with High or Extremely High Baseline Water Stress, by property subsector	Quantitative	% by floor area	IF-RE-140a.1	3.2.1.5
	Total water withdrawn by portfolio area with data coverage and percentage in regions with High or Extremely High Baseline Water stress, by property subsector	Quantitative	m <sup>3</sup> ,%	IF-RE-140a.2	3.2.1.5
	Like-for-like percentage change in water withdrawn for portfolio area with data coverage, by property subsector	Quantitative	%	IF-RE-140a.3	3.2.1.5
	Description of water management risks and discussion of strategies and practices to mitigate those risks	Discussion and analysis	N/A	IF-RE-140a.4	3.2.1.5
<b>Management of tenant sustainability impacts</b>	Percentage of new leases that contain a cost recovery clause for resource efficiency-related capital improvements and associated leased floor area, by property subsector	Quantitative	% by floor area, m2	IF-RE-410a.1	
	Percentage of tenants that are separately metered or submetered for grid electricity consumption and water withdrawals, by property subsector	Quantitative	% by floor area	IF-RE-410a.2	n.a
	Discussion of approach to measuring, incentivising, and improving sustainability impacts of tenants	Discussion and analysis	N/A	IF-RE-410a.3	3.3.4.5
<b>Climate change adaptation</b>	Area of properties located in 100-year flood zones, by property subsector	Quantitative	m <sup>2</sup>	IF-RE-450a.1	3.2.1.1.12
	Description of climate change risk exposure analysis, degree of systematic portfolio exposure, and strategies for mitigating risks	Discussion and analysis	N/A	IF-RE-450a.2	3.2.1.1.12

Activity Metric	Category	Unit of Measure	Code	Hotels in Europe
Number of assets, by property subsector	Quantitative	Number	IF-RE-000.A	283
Lettable floor area, by property subsector (including land plots)	Quantitative	m <sup>2</sup>	IF-RE-000.A	39,500 rooms
Percentage of indirectly managed assets, by property subsector	Quantitative	% by floor area	IF-RE-000.C	66%
Average occupancy rate, by property subsector	Quantitative	%	IF-RE-000.C	100%

### 3.5.1.3 Table: Environmental risks, probability of occurrence, level of impact

#### Covivio's strengths and weaknesses in coping with them and the associated areas of strategy

TNFD category	Description	Probability of occurrence by scenario (Sc.)	Level of impact taking vulnerability into account	Strengths and weaknesses	Related areas of the Covivio strategy
Physical – One-off and chronic	<p>● Disruption of supply chains and material shortages due to extreme events (e.g. wood shortages due to forest fires, pests, concrete shortages due to water stress).</p> <p>-&gt; Main financial risks: construction delays, increase in the cost of materials.</p>	Sc. 1: Certain; Sc. 2: Very likely	Sc. 1: Medium; Sc. 2: Low	Covivio has a wide variety of suppliers and can therefore adapt to changes in the availability of materials. However, shortages can lead to increased costs and delivery delays. A Group-wide sourcing strategy, and more local anchoring can be examined. Covivio has had a Responsible Purchasing policy in place since 2010 and strengthened it in 2023 by extending its scope to all of the Group's activities and using EcoVadis' services. 186 of the Group's suppliers were rated at the end of 2023.	<p>Pillar 1 – Avoiding damage to natural spaces</p> <p>– Priority # 3 – Establish a traceability standard for key materials.</p> <p>And Pillar 2 – Reduce resource consumption</p> <p>– Priority # 2 – Reduce dependency on new raw materials.</p>
	<p>● Loss of worker productivity due to heat waves.</p> <p>-&gt; Main financial risks: construction delays in the event of prolonged heat waves.</p>	Sc. 1: Very likely; Sc. 2: Probable	Sc. 1: High; Sc. 2: Low	Despite the identification of the risk, Covivio appears to have limited room for manoeuvre, with few levers for action regarding the organisation of construction sites. Among the solutions adopted by construction companies are staggered working hours and postponing certain work to non-heatwave days.	This risk is not directly linked to an action plan objective but is part of the Group's adaptation strategy, starting with a commitment to map the various risks in its portfolio using recognised scientific scenarios.
	<p>● Damage to real estate assets due to climate change (flooding, temperature, soil, etc.).</p> <p>-&gt; Main financial risks: loss of value and accelerated obsolescence, repair works.</p>	Sc. 1: Very likely; Sc. 2: Probable	Sc. 1: Medium; Sc. 2: Very low	This risk is well identified by Covivio. Nevertheless, the studies carried out have shown that the Group's assets face limited exposure to climatic hazards. The MSCI 2023 study concludes that, based on a 5°C – ROE 8.5 scenario, at 2050 (worst-case scenario), physical risks represent 0.24% of the value of the assets analysed (–0.45% by 2100). Over the same period, 14% (by surface area) of the assets analysed should face an increase of more than 1°C. In addition, 29% of the assets analysed could face 20 days of heat wave (respectively 13% compared to 25 days of heat wave), and 13% could experience an average of 10 days of intense rain per year.	
	<p>● Damage to real estate assets caused by rising sea levels, increased temperatures and reduced soil maintenance.</p> <p>-&gt; Main financial risks: loss of value and accelerated obsolescence, repair works.</p>	Sc. 1: Very likely; Sc. 2: Probable	Sc. 1: High; Sc. 2: Medium	This risk is well identified by Covivio: according to the studies carried out, very few assets are exposed but those that are would be badly affected (up to 2% of the value of the assets concerned). Construction reinforcement measures have been taken to mitigate the risk of flooding on all new at-risk projects. Soil characteristics are also taken into account for new projects.	



TNFD category	Description	Probability of occurrence by scenario (Sc.)	Level of impact taking vulnerability into account	Strengths and weaknesses	Related areas of the Covivio strategy
Transition – Political	<p>● Obligation to install solar panels or green roofs on 30% to 50% of the surface area for all new commercial, industrial and small business buildings or warehouses (or those built after 2019) (Climate and Energy Act) and on existing buildings in the longer term.</p> <p>-&gt; Main financial risks: additional costs related to equipment and facilities.</p>	Sc. 1: Very likely; Sc. 2: Certain	Sc. 1: Medium; Sc. 2: Low	In general, Covivio installs green roofs and/or solar panels on the buildings it constructs or renovates. However, technical constraints for existing buildings or local regulations may hinder the development of these systems.	Pillar 3 – Contribute to improving biodiversity in the city.
	<p>● Creation and increase of the carbon tax affecting the import prices of materials (e.g. cement under the EU's new ETS).</p> <p>-&gt; Main financial risks: additional costs related to the increase in the price of materials.</p>	Sc. 1: Probable; Sc. 2: Certain	Sc. 1: Medium; Sc. 2: Low	The creation of a carbon tax could affect the profitability of certain projects, particularly in the residential sector. The teams are monitoring the practical application of these taxes.	Pillar 2 – Reduce resource consumption – Priority # 1 – Buildings are designed to enable customers to reduce their water and energy consumption.
	<p>● Obligation to produce increasingly comprehensive and detailed CSR reporting in line with regulations and investor requirements (e.g. publication of a complete biodiversity footprint, with metrics, information on the value chain and the location of activities (link with SBTN), transition plan).</p> <p>-&gt; Main financial risks: costs related to the additional reporting.</p>	Sc. 1: Very likely; Sc. 2: Certain	Sc. 1: Medium; Sc. 2: Low	Covivio's reporting is already well structured, however, difficulties in obtaining certain data in connection with recent regulations have been identified, particularly in the value chain. A set of MSCI-type studies have been performed to calibrate the Group's transition plan.	Pillar 1 Avoiding damage to natural habitats – Priority # 3 – Establish a traceability standard for key materials.
	<p>● Obligation to demonstrate that purchases of raw materials are compatible with the Deforestation-free Products Regulation for goods imported into Europe (timber and rubber are already covered, the regulation could be extended to mining products).</p> <p>-&gt; Main financial risks: verification and reporting costs.</p>	Sc. 1: Probable; Sc. 2: Certain	Sc. 1: Low; Sc. 2: Low	Commitments relating to obtaining certain labels require information to be collected on the origin of certain materials. These actions are very <i>ad hoc</i> at the present time.	Pillar 1 – Avoiding damage to natural spaces – Priority # 3 – Implement a traceability standard for key materials.

TNFD category	Description	Probability of occurrence by scenario (Sc.)	Level of impact taking vulnerability into account	Strengths and weaknesses	Related areas of the Covivio strategy
Transition - Political	<p>● Compulsory labelling of buildings regarding the use of bio-sourced materials (e.g.: RE2020, E + C-, etc.).</p> <p>-&gt; Main financial risks: additional costs of materials insofar as the sector is not yet structured.</p>	Sc. 1: Unlikely; Sc. 2: Very likely	Sc. 1: Medium; Sc. 2: Medium	By obtaining a certain number of certifications (e.g. HQE, BREEAM, LEED, BBCA) for certain projects, the teams involved are guaranteed to have the necessary skills. Nonetheless, these initiatives must be structured in accordance with the Group's strategy. These initiatives are also rarely mentioned or highlighted in the standards, which does not encourage their implementation. Difficulties associated with sourcing sustainable materials and increasing costs are also to be expected.	Pillar 1 - Avoiding damage to natural spaces - Priority # 3 - Implement a traceability standard for key materials.
	<p>● Obligation to comply with legislation relating to restrictions on planning, land artificialisation of land and the protection of natural spaces (e.g. CBD target of 30% protected areas, green and blue corridors, etc.).</p> <p>-&gt; Main financial risks: construction costs (however already included in the projects overall).</p>	Sc. 1: Certain; Sc. 2: Certain	Sc. 1: Medium; Sc. 2: Very low	One of Covivio's strategic objectives is to minimise the artificialisation of land. Most of the Group's projects are densification projects in urban areas. However, the regeneration of natural environments in artificialised areas can pose technical challenges.	Pillar 1 - Avoiding damage to natural areas - Priority # 2 - Real estate development is no longer associated with damage to natural spaces.
	<p>Increase in the price of raw materials linked to the growing demand in priority sectors (e.g. the demand for concrete and steel in the wind energy sector).</p> <p>-&gt; Main financial risks: increase in costs.</p>	Sc. 1: Probable; Sc. 2: Probable	Sc. 1: High; Sc. 2: Low	Covivio has identified building renovation, in particular to improve energy performance, as a growth market. However, the economic profitability of these projects may vary depending on the price of the materials used.	Pillar 1 - Avoiding damage to natural areas - Priority # 2 - Real estate development is no longer associated with damage to natural spaces.
Transition - Market	<p>Changing customer/tenant preferences towards sustainable building design (e.g., healthy, energy-efficient, ecological and modular building materials, the restoration of natural habitats, etc.).</p> <p>-&gt; Main financial risks: decrease in revenues, increase in construction costs.</p>	Sc. 1: Probable; Sc. 2: Very likely	Sc. 1: Medium; Sc. 2: Low	Covivio is already aware of customers' demands regarding the energy performance of buildings and is able to adapt to this demand by offering related services. Apart from the equipment, the changes required to building architecture can pose technical difficulties in terms of energy efficiency.	Pillar 1 - Avoiding damage to natural areas - Priority # 2 - Real estate development is no longer associated with damage to natural spaces.
Transition - Technology	<p>Increase in the number of designs to take the need for flexible building use into account (e.g.: coworking for offices, easy conversion of offices into residential, co-use, etc.) leading to a reduction in artificialisation.</p> <p>-&gt; Main financial risks: increase in costs related to materials/ equipment deployed and energy.</p>	Sc. 1: Very likely; Sc. 2: Very likely	Sc. 1: Medium; Sc. 2: Low	Incorporating flexibility into how buildings are used is an integral part of the Group's vision, with the positive effect of extending the building's lifespan by reducing its potential for obsolescence at the design stage. However, these desires for flexibility may conflict with economic constraints as they generate additional costs.	Pillar 2 - Reduce resource consumption - Priority # 1 - Buildings are designed to enable customers to reduce their water and energy consumption.



TNFD category	Description	Probability of occurrence by scenario (Sc.)	Level of impact taking vulnerability into account	Strengths and weaknesses	Related areas of the Covivio strategy
<b>Transition - Reputation and Responsibility</b>	Local conflicts related to land availability, reduced space available for development and soil quality. -> Main financial risks: potential litigation costs.	Sc. 1: Very likely; Sc. 2: Probable	Sc. 1: Low; Sc. 2: Low	The majority of the Group's projects do not involve the conversion of natural spaces, although the creation of a new building can always be a source of conflict locally.	Pillar 1 - Avoiding damage to natural areas - Priority # 2 - Real estate development is no longer associated with damage to natural spaces.
	Local conflicts related to water use, during the construction phase and the building use phase. -> Main financial risks: shutdown of operations or certain specific equipment assets (particularly in the hotel industry).	Sc. 1: Certain; Sc. 2: Probable	Sc. 1: Medium; Sc. 2: Medium	All of Covivio's new projects and renovated buildings are equipped with water saving devices. The issue is specifically identified internally in the hotel portfolio, where water consumption is highest and where specific restrictions may be applied in the event of a shortage (e.g. swimming pools). The equipment of old buildings remains more complex.	Pillar 1 - Avoiding damage to natural areas - Priority # 2 - Real estate development is no longer associated with damage to natural spaces.
	Reputational risk linked to scandals concerning supply in the value chain or legal action for non-compliance with environmental regulations. -> Main financial risks: litigation or reputational risks with a potential impact on marketing.	Sc. 1: Probable; Sc. 2: Certain	Sc. 1: Low; Sc. 2: Low	In addition to obtaining certain labels, for which specific criteria relating to the source of the materials must be met, the traceability of the materials is monitored on a large scale at the project level. The few initiatives for enhanced traceability must be structured at Group level.	Pillar 2 - Reduce our consumption of resources - Priority # 1 - Buildings are exemplary in enabling customers to reduce their water and energy consumption.
	Accusations of exaggerating claims about sustainable practices (greenwashing). -> Main financial risks: mainly reputational risks that could cause a drop in the confidence of our partners.	Sc. 1: Unlikely; Sc. 2: Very likely	Sc. 1: Low; Sc. 2: Low	Covivio positions itself as a player that provides rational and substantiated environmental reporting, as close as possible to or even in anticipation of regulatory requirements, in a spirit of transparency.	Pillar 1 - Avoiding damage to natural spaces - Priority # 3 - Implement a traceability standard for key materials.
<b>Ecosystem stability</b>	Local shortages of drinking water. -> Main financial risks: a moderate operating risk at Group level but which could specifically impact the local hotel industry.	Sc. 1: Very likely; Sc. 2: Probable	Sc. 1: High; Sc. 2: Low	This risk has been clearly identified by Covivio: according to the Aqueduc WRI study carried out in 2023, more than 50% of Covivio's portfolio is located in regions with high water stress (not only the south, but also highly densified regions with relatively fewer resources available, such as northern France, Belgium or cities like Frankfurt).	
	Shortages of certain bio-sourced materials (e.g. wood, sand). -> Main financial risks: construction delays and potential substitution costs.	Sc. 1: Very likely; Sc. 2: Probable	Sc. 1: Medium; Sc. 2: Low	Covivio has a wide variety of suppliers and can therefore adapt to changes in the availability of materials. However, shortages can lead to increased costs and delivery delays. A Group-wide sourcing strategy, as well as a more localised anchoring of this strategy, would be necessary.	

● Main risks identified during the analysis.

**Table: Main environmental opportunities, probability of occurrence, level of impact, Covivio's strengths and weaknesses in tackling them and associated strategic areas**

TNFD category	Description	Probability of occurrence by scenario	Level of impact taking vulnerability into account	Strengths and weaknesses	Related areas of the Covivio strategy
<b>Business - Market</b>	● New renovation and deconstruction market, in line with zero net artificialisation policies.	Sc. 1: Probable; Sc. 2: Certain	Sc. 1: Medium; Sc. 2: Low	Expertise on some of these offers exists within the Group, especially on the office portfolio, where half of the operations are already renovations and a quarter involve densification or implantation projects in already artificialised areas.  However, renovation projects may have more technical constraints and be more costly for older buildings. The Group also needs to develop its expertise in the circular economy in the cleaning/deconstruction phase, which is still in the pilot stage.	Pillar 1 - Avoiding damage to natural areas - Priority # 2 - Real estate development is no longer associated with damage to natural spaces.
	● New market for the design of sustainable buildings (e.g. energy-efficient, green building materials, modular, including restoration of natural habitats, etc.)	Sc. 1: Unlikely; Sc. 2: Certain	Sc. 1: Medium; Sc. 2: Low	Projects are designed to incorporate a range of measures to optimise the environmental performance of buildings, in line with the long-standing strategy of certifying buildings. The use of sustainable materials is a common practice, but not systematic, due to the lack of a structured Group-wide policy in this regard. The price of these materials can also be a barrier to their use, particularly in a difficult economic context.	Pillar 1 - Avoiding damage to natural areas - Priority # 2 - Real estate development is no longer associated with damage to natural spaces.
<b>Business - Efficient use of resources</b>	Reduction in the cost of recycled and bio-based materials due to the greater maturity of the sector and financial incentives, etc.	Sc. 1: Probable; Sc. 2: Very likely	Sc. 1: Medium; Sc. 2: Low	There are internal resources on the use of recycled and bio-sourced materials, pilot projects, and training is in progress to improve this expertise, although the use of these materials is not systematic. Nevertheless, the use of some of these materials continues to be a challenge in terms of supply, regulatory framework and/or business model. Working with partners in the sector remains key for Covivio.	Pillar 2 - Reducing resource consumption - Priority # 2 - Dependency on new raw materials is reduced.
	● Measures to reduce energy and water consumption in residential and office buildings. Reduction of costs for tenants associated with heating residential buildings and producing renewable energy.	Sc. 1: Probable; Sc. 2: Certain	Sc. 1: Low; Sc. 2: Low	Building renovation (commercial and residential buildings) is also a strong lever that has been identified (implementation of the €261 million green Capex plan from 2023 to 2030 as part of the carbon trajectory). The teams are constantly working on optimising the energy consumption of the assets. Annexes and green clauses included in leases make it possible to commit tenants and owners to these issues. However, these efforts are more difficult to implement on existing assets than on new projects, and the results also depend on the practices of tenants, and the Group therefore also aims to raise tenants' awareness of these issues.	Pillar 2 - Reduce the consumption of resources - Priority # 1 - Buildings are exemplary because we enable our customers to reduce their water and energy consumption
<b>Business - Capital flows and financing</b>	● Increased financing opportunities related to the development of sustainable real estate projects (green bonds, private or public investments, conservation financing, etc.)	Sc. 1: Probable; Sc. 2: Certain	Sc. 1: Low; Sc. 2: Low	Financial market players have already identified the Group's activities as suitable for green financing. Two Green Bond frameworks specify the eligibility conditions for assets (e.g. full alignment with the Taxonomy criteria for the hotel industry).	Pillar 3 - Contribute to the improvement of biodiversity in cities - Priority # 1 - Have a positive impact on biodiversity in 100% of our operations
<b>Business - Reputation</b>	Reputation opportunities linked to the environmental quality and quality of life offered by the portfolio.	Sc. 1: Probable; Sc. 2: Very likely	Sc. 1: Medium; Sc. 2: Medium	Covivio's tenants have recognised it as an environmentally committed lessor through its commitment to improving the quality of life of its tenants by introducing of green spaces and energy efficiency and water saving measures. This was confirmed by an independent study carried out on the German scope.	Pillar 3 - Contribute to the improvement of biodiversity in cities - Priority # 1 - Have a positive impact on biodiversity in 100% of our operations

TNFD category	Description	Probability of occurrence by scenario	Level of impact taking vulnerability into account	Strengths and weaknesses	Related areas of the Covivio strategy
<b>Sustainability performance – Sustainable use of natural resources</b>	Designing buildings to optimise the use of resources, focussing on renovation and end-of-life optimisation.	Sc. 1: Probable; Sc. 2: Certain	Sc. 1: Low; Sc. 2: Low	The teams work on a case-by-case basis on new designs and the reduction of the use of resources in particular, using life cycle analyses and the BIM (Building Information Modelling) system. However, these initiatives are still based on commercial opportunities and could be associated with defined strategic objectives.	Pillar 2 – Reducing resource consumption – Priority # 2 – Reducing dependency on new raw materials.
<b>Sustainability performance – Protection, restoration and regeneration of ecosystems</b>	● Use of the portfolio's green spaces to contribute to ecological continuity or to restore biodiversity in city centres (based on ecological diagnostics)	Sc. 1: Unlikely; Sc. 2: Certain	Sc. 1: Low; Sc. 2: Low	Restoring ecological continuity sometimes forms part of the environmental objectives associated with the development of certain projects. It is conducted on the basis of ecological studies and is evaluated by the calculation of the CBS (biotope coefficient by area) before and after the project – a calculation performed on all French projects. However, the use of this type of diagnostic and practices needs to be systematised at Group level.	Pillar 3 – Contribute to improving biodiversity in the city

● Main opportunities identified during the analysis

### Details of forward-looking scenarios used for risk and opportunity analysis

The analysis of climate and biodiversity risks and opportunities was based on two scenarios designed on the basis of the four forward-looking scenarios by 2050 proposed by ADEME in its publication "Transition(s) 2050: Four scenarios and their serials to achieve carbon neutrality by 2050". The two scenarios used are as follows:

	<b>Opportunistic adaptation</b> In a less restrictive regulatory context, the transition to more sustainable models is difficult and slower than environmental change. Some institutional shortcomings generate additional costs and poor adaptation strategies are observed. The ecosystems are damaged, the temperature rises by +3°C by 2050.	<b>Planned transformation</b> Strongly stimulated by regulations, society is evolving towards a more sustainable model, based on the conservation of resources and the adaptation. The structure of the economy is undergoing a profound transformation, enabling economic players to rethink their models. The ecosystems are preserved, and the rise in temperature is kept at +2°C by 2050.
State of ecosystems	Global warming and the loss of biodiversity are not stopped. Ecosystem services are degraded, and technological solutions are used, generating additional costs.	Nature is protected, solutions based on nature are put in place. Ecosystem services have maintained a functional level, and access to natural resources is highly regulated.
Land availability	Development of large cities and land artificialisation	Drastic reduction in the number of new buildings
Change in eating habits	Low, meat consumption decreases slightly.	High, meat consumption meat decreases significantly.
Energy	Slight decrease in consumption, significant use of biomass and renewable energy.	Significant reduction in energy consumption, massive renovation of buildings.
Materials and circular economy	An increase in the quantities of steel, aluminium, glass, and paper-cardboard and plastics from recycling.	The majority of quantities of steel, aluminium, glass, paper and cardboard and plastics come from recycling.
Agriculture	Intensification of agriculture, particularly in relation to energy needs	Extensification of agriculture
International trade	Very important role of imports in a globalised economy promoting trade	Contracted industrial production and tightening of the supply on "Made in France"
Regulatory context	Not very restrictive, based on transparency of practices and incentives	Restrictive, based on strong penalties in the event of non-compliance



## 3.5.2 List of assets and compliance with Green Bonds criteria

### Selected assets portfolio - Hotels (as of 31 December 2024)

Last name	Town/City	Country	Classification 31/12/2024	100% surface areas on 31/12/2024	Eligible category	Main certification criteria	Green clause (on new leases outside France)	Accessibility <500 m
Baden Airpark	Rheinmünster	Germany	In operation	1,879	Green Building	Taxonomy	*	✓
Erlangen	Erlangen	Germany	In operation	2,167	Green Building	Taxonomy	*	✓
Freiburg	Freiburg	Germany	In operation	2,080	Green Building	Taxonomy	*	✓
Mannheim	Mannheim	Germany	In operation	2,290	Green Building	Taxonomy	*	✓
Niederrad	Frankfurt	Germany	In operation	3,005	Green Building	Taxonomy	*	✓
Braunschweig	Braunschweig	Germany	In operation	1,776	Green Building	Taxonomy	*	✓
Hanover North	Hanover	Germany	In operation	1,876	Green Building	Taxonomy	*	✓
Herne	Herne	Germany	In operation	1,574	Green Building	Taxonomy	*	✓
Köln-Porz	Köln-Porz	Germany	In operation	2,063	Green Building	Taxonomy	*	✓
Aachen	Würselen	Germany	In operation	1,776	Green Building	Taxonomy	*	✓
Frankfurt-Nord	Frankfurt	Germany	In operation	2,107	Green Building	Taxonomy	*	✓
Mainz	Mainz	Germany	In operation	1,999	Green Building	Taxonomy	*	✓
Mülheim	Mülheim an der Ruhr	Germany	In operation	2,306	Green Building	Taxonomy	*	✓
Berlin Messe	Berlin	Germany	In operation	4,402	Green Building	Taxonomy	*	✓
Erfurt	Erfurt	Germany	In operation	2,597	Green Building	Taxonomy	*	✓
Duisburg	Duisburg	Germany	In operation	2,706	Green Building	Taxonomy	*	✓
Berlin-Süd	Genshagen	Germany	In operation	1,827	Green Building	Taxonomy	*	✓
Düsseldorf Airport	Düsseldorf	Germany	In operation	2,262	Green Building	Taxonomy	*	✓
Munich Airport – Hallbergmoos	Hallbergmoos	Germany	In operation	2,864	Green Building	Taxonomy	*	✓
Essen	Essen	Germany	In operation	2,900	Green Building	Taxonomy	*	✓
Regensburg	Regensburg	Germany	In operation	3,109	Green Building	Taxonomy	*	✓
Mönchengladbach	Mönchengladbach	Germany	In operation	2,450	Green Building	Taxonomy	*	✓
Würzburg	Würzburg	Germany	In operation	1,837	Green Building	Taxonomy	*	✓
Böblingen	Böblingen	Germany	In operation	2,430	Green Building	Taxonomy	*	✓
Heidelberg	Heidelberg	Germany	In operation	2,506	Green Building	Taxonomy	*	✓
Nuremberg	Nuremberg	Germany	In operation	4,656	Green Building	Taxonomy	*	✓
Osnabruck	Osnabruck	Germany	In operation	2,358	Green Building	Taxonomy	*	✓
Potsdam	Potsdam	Germany	In operation	2,626	Green Building	Taxonomy	*	✓
Konstanz	Konstanz	Germany	In operation	2,400	Green Building	Taxonomy	*	✓
Munich	Aschheim	Germany	In operation	2,666	Green Building	Taxonomy	*	✓
Lübeck	Lübeck	Germany	In operation	3,502	Green Building	Taxonomy	*	✓
Hamburg East	Hamburg	Germany	In operation	4,132	Green Building	Taxonomy	*	✓
Première Classe Frankfurt-Offenbach	Frankfurt	Germany	In operation	1,626	Green Building	Taxonomy	*	✓
Première Classe Schweinfurt	Schweinfurt	Germany	In operation	1,626	Green Building	Taxonomy	*	✓
Première Classe Kassel	Kassel	Germany	In operation	1,626	Green Building	Taxonomy	*	✓
Première Classe Hanover	Hanover	Germany	In operation	1,626	Green Building	Taxonomy	*	✓
Première Classe Düsseldorf – Ratingen	Düsseldorf	Germany	In operation	1,627	Green Building	Taxonomy	*	✓
Première Classe Berlin	Berlin	Germany	In operation	2,239	Green Building	CRREM	*	✓
Première Classe Düsseldorf City Süd	Düsseldorf	Germany	In operation	2,162	Green Building	Taxonomy	*	✓
Première Classe Köln	Cologne	Germany	In operation	2,239	Green Building	Taxonomy	*	✓
Meininger Munich	Munich	Germany	In operation	6,969	Green Building	Taxonomy	*	✓
Motel One Frankfurt Niederrad	Frankfurt	Germany	In operation	5,377	Green Building	Taxonomy	*	✓
NH Nuremberg	Nuremberg	Germany	In operation	12,901	Green Building	CRREM	*	✓
NH Stuttgart	Stuttgart	Germany	In operation	11,883	Green Building	CRREM	*	✓
NH Frankfurt	Frankfurt	Germany	In operation	6,569	Green Building	CRREM	*	✓
NH Oberhausen	Oberhausen	Germany	In operation	6,583	Green Building	CRREM	*	✓



Last name	Town/City	Country	Classification 31/12/2024	100% surface areas on 31/12/2024	Eligible category	Main certification criteria	Green clause (on new leases outside France)	Accessibility <500 m
NH Düsseldorf Königsallee	Düsseldorf	Germany	In operation	3,413	Green Building	Taxonomy	*	✓
NH Berlin City Ost	Berlin	Germany	In operation	2,847	Green Building	Taxonomy	*	✓
NH Hamburg Mitte	Hamburg	Germany	In operation	5,735	Green Building	CRREM	*	✓
Ibis Dresden	Dresden	Germany	In operation	38,415	Green Building	Taxonomy	*	✓
Mercure Potsdam City	Potsdam	Germany	In operation	13,555	Green Building	Taxonomy	*	✓
The Westin Grand Berlin	Berlin	Germany	In operation	34,494	Green Building	Taxonomy	*	✓
The Westin Leipzig	Leipzig	Germany	In operation	45,579	Green Building	Taxonomy	*	✓
Radisson Blu Leipzig	Leipzig	Germany	In operation	20,705	Green Building	Taxonomy	*	✓
Radisson Blu Erfurt	Erfurt	Germany	In operation	16,000	Green Building	Taxonomy	*	✓
Park Inn Alexander Platz	Berlin	Germany	In operation	81,313	Green Building	Taxonomy	*	✓
Novotel Brussels Grd Place	Brussels	Belgium	In operation	7,870	Green Building	CRREM	*	✓
Novotel Gent Centrum	Ghent	Belgium	In operation	7,393	Green Building	CRREM	*	✓
Ibis Brussels Grand Place	Brussels	Belgium	In operation	5,099	Green Building	CRREM	*	✓
Ibis Brussels Airport	Machelen	Belgium	In operation	2,648	Green Building	CRREM	*	✓
Ibis Brugge Centrum	Bruges	Belgium	In operation	3,768	Green Building	CRREM	*	✓
Ibis Antwerpen Centrum	Antwerp	Belgium	In operation	4,476	Green Building	CRREM	*	✓
Ibis Gent Opera	Ghent	Belgium	In operation	4,250	Green Building	CRREM	*	✓
Ibis Brussels. Expo Atomium	Grimbergen	Belgium	In operation	3,689	Green Building	Taxonomy	*	✓
Crowne Plaza Brussels Airport	Brussels	Belgium	In operation	21,243	Green Building	CRREM	*	✓
Park Inn Louvain	Leuven	Belgium	In operation	6,728	Green Building	CRREM	*	✓
Ibis Gent Centrum St Baafs Kathedraal	Gent	Belgium	In operation	4,150	Green Building	CRREM	*	✓
Aeropuerto Barcelona by Melia	Barcelona	Spain	In operation	14,132	Green Building	Taxonomy	*	✓
Ramada Valencia Almussafes	Almussafes	Spain	In operation	5,592	Green Building	Taxonomy	*	✓
Hotel Plaza Nice	Nice	France	In operation	10,000	Green Building	Taxonomy	✓	✓
IBIS BUDGET MULHOUSE DORNACH	Mulhouse	France	In operation	1,353	Green Building	CRREM	✓	✓
IBIS BUDGET TOULOUSE MATABIAU CENTRE GARE	Toulouse	France	In operation	3,500	Green Building	CRREM	✓	✓
NOVOTEL LYON NORD	Dardilly	France	In operation	4,283	Green Building	CRREM	✓	✓
NOVOTEL PARIS CERGY	Cergy-Pontoise	France	In operation	7,717	Green Building	CRREM	✓	✓
Novotel Paris Massy	Palaiseau	France	In operation	5,826	Green Building	CRREM	✓	✓
Novotel Paris Roissy	Roissy	France	In operation	10,014	Green Building	Taxonomy	✓	✓
Novotel Strasbourg Halle	Strasbourg	France	In operation	3,762	Green Building	CRREM	✓	✓
Novotel Atria Grenoble	Grenoble	France	In operation	6,004	Green Building	CRREM	✓	✓
Ibis Annecy	Annecy	France	In operation	2,661	Green Building	CRREM	✓	✓
IBIS CHARTRES CENTRE	Chartres	France	In operation	1,443	Green Building	CRREM	✓	✓
IBIS MARSEILLE CENTRE	Marseille	France	In operation	1,310	Green Building	CRREM	✓	✓
Ibis Metz Centre Cathédrale	Metz	France	In operation	2,094	Green Building	CRREM	✓	✓
Ibis Paris Bastille Opéra	Paris	France	In operation	7,862	Green Building	CRREM	✓	✓
IBIS PARIS VERSAILLES PARLY 2	Le Chesnay	France	In operation	1,851	Green Building	CRREM	✓	✓
IBIS ROUEN CENTRE RIVE GAUCHE	Rouen	France	In operation	2,398	Green Building	CRREM	✓	✓
MERCURE PARIS LA DEFENSE	Nanterre	France	In operation	5,851	Green Building	CRREM	✓	✓
MERCURE ST QUENTIN	Montigny-le-Bretonneux	France	In operation	3,507	Green Building	Taxonomy	✓	✓
NOVOTEL LILLE CENTRE PALAIS CONGRES	Lille	France	In operation	4,360	Green Building	CRREM	✓	✓
IBIS BUDGET L'ISLE ADAM	L'Isle d'Adam	France	In operation	1,410	Green Building	CRREM	✓	✓
IBIS BUDGET GENNEVILLIERS	Gennevilliers	France	In operation	2,720	Green Building	CRREM	✓	✓
IBIS ARRAS	Arras	France	In operation	1,354	Green Building	CRREM	✓	✓
IBIS BORDEAUX GARE	Bordeaux	France	In operation	2,100	Green Building	CRREM	✓	✓
IBIS FONTAINEBLEAU	Fontainebleau	France	In operation	2,615	Green Building	CRREM	✓	✓
IBIS MARSEILLE PRADO	Marseille	France	In operation	2,975	Green Building	CRREM	✓	✓
IBIS NANCY CENTRE GARE	Nancy	France	In operation	2,436	Green Building	CRREM	✓	✓
IBIS PARIS CAMBRONNE	Paris	France	In operation	15,235	Green Building	CRREM	✓	✓
IBIS STRASBOURG HALLES	Strasbourg	France	In operation	2,600	Green Building	CRREM	✓	✓
IBIS STYLES PARIS BERCY	Paris	France	In operation	7,944	Green Building	CRREM	✓	✓
NOVOTEL LILLE FLANDRES	Lille	France	In operation	3,780	Green Building	CRREM	✓	✓
MERCURE PARIS PORTE ST CLOUD	Boulogne Billancourt	France	In operation	9,920	Green Building	Taxonomy	✓	✓

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MERCURE NICE	Nice	France	In operation	4,253	Green Building	CRREM	✓	✓
Angers 1	BEAUCOUZE	France	In operation	1,367	Green Building	Taxonomy	✓	✓
Aulnay-sous-Bois	AULNAY-SOUS-BOIS	France	In operation	2,620	Green Building	CRREM	✓	✓
Évry Lisces 1	EVRY LES LISSES	France	In operation	1,839	Green Building	CRREM	✓	✓
Avranches	AVRANCHES	France	In operation	1,380	Green Building	Taxonomy	✓	✓
Évry Lisces 2	EVRY LES LISSES	France	In operation	1,918	Green Building	Taxonomy	✓	✓
Béziers	VILLENEUVE LES BÉZIERS	France	In operation	1,468	Green Building	Taxonomy	✓	✓
Bordeaux Bruges	Bordeaux	France	In operation	1,683	Green Building	CRREM	✓	✓
Bordeaux Mérignac	MÉRIGNAC	France	In operation	1,574	Green Building	CRREM	✓	✓
Hyères	HYERES	France	In operation	918	Green Building	CRREM	✓	✓
La Queue-en-Brie	La Queue-en-Brie	France	In operation	1,076	Green Building	CRREM	✓	✓
Brest Kergaradec	BREST KERGADEDEC	France	In operation	935	Green Building	CRREM	✓	✓
Brest Port	Brest	France	In operation	2,389	Green Building	Taxonomy	✓	✓
Brignoles	BRIGNOLES	France	In operation	1,622	Green Building	Taxonomy	✓	✓
Caen Mémorial	SAINT-CONTEST	France	In operation	1,362	Green Building	CRREM	✓	✓
Chalon Sur Saône Sud	SAINT-REMY	France	In operation	1,453	Green Building	CRREM	✓	✓
Chambéry	CHAMBERY	France	In operation	1,653	Green Building	Taxonomy	✓	✓
Le Mans Sud	ARNAGE	France	In operation	1,367	Green Building	Taxonomy	✓	✓
Lens Noyelles-Godault	NOYELLES-GODAULT	France	In operation	1,612	Green Building	Taxonomy	✓	✓
Nantes Saint Herblain	SAINT HERBLAIN	France	In operation	1,683	Green Building	Taxonomy	✓	✓
Orgeval	ORGEVAL	France	In operation	1,617	Green Building	Taxonomy	✓	✓
Paray-le-Monial	PARAY-LE-MONIAL	France	In operation	1,629	Green Building	CRREM	✓	✓
Louveciennes	LOUVECIENNES	France	In operation	1,822	Green Building	CRREM	✓	✓
Poitiers 1	CHASSENEUIL -DU-POITOU	France	In operation	1,442	Green Building	Taxonomy	✓	✓
Lyon Gambetta	LYON	France	In operation	2,617	Green Building	Taxonomy	✓	✓
Lyon Monplaisir	LYON	France	In operation	2,740	Green Building	Taxonomy	✓	✓
Poitiers 3	CHASSENEUIL -DU-POITOU	France	In operation	2,353	Green Building	Taxonomy	✓	✓
Lyon Vénissieux	VENISSEIUX	France	In operation	3,515	Green Building	Taxonomy	✓	✓
Malakoff – Paris Parc des Expositions	MALAKOFF	France	In operation	5,225	Green Building	CRREM	✓	✓
Rennes Cesson-Sévigné	CESSON-SEVIGNE	France	In operation	1,859	Green Building	CRREM	✓	✓
Rennes Saint-Grégoire	SAINT GREGOIRE CEDEX	France	In operation	1,574	Green Building	Taxonomy	✓	✓
Rouen Saint- Étienne-du-Rouvray	ST ETIENNE-DU-ROUVRAY	France	In operation	1,441	Green Building	Taxonomy	✓	✓
Maurepas	MAUREPAS	France	In operation	1,362	Green Building	CRREM	✓	✓
Nantes Centre	NANTES	France	In operation	1,723	Green Building	CRREM	✓	✓
Nantes La Beaujoire	NANTES	France	In operation	1,367	Green Building	Taxonomy	✓	✓
Cholet	CHOLET	France	In operation	1,355	Green Building	CRREM	✓	✓
Saint-Michel-sur-Orge	SAINT -MICHEL-SUR-ORGE	France	In operation	1,331	Green Building	CRREM	✓	✓
Saint-Quentin	ST QUENTIN	France	In operation	1,514	Green Building	Taxonomy	✓	✓
Colmar	WINTZENHEIM	France	In operation	1,362	Green Building	CRREM	✓	✓
Corbeil	CORBEIL-ESSONNES	France	In operation	1,076	Green Building	CRREM	✓	✓
Tours Nord 1	TOURS	France	In operation	1,278	Green Building	Taxonomy	✓	✓
Tours Nord 2	TOURS	France	In operation	1,361	Green Building	CRREM	✓	✓
Tours Sud	JOUE LES TOURS	France	In operation	1,574	Green Building	Taxonomy	✓	✓
Troyes Barberey	BARBEREY ST SULPICE	France	In operation	1,502	Green Building	Taxonomy	✓	✓
Dieppe Saint-Aubin	ST AUBIN SUR SCIE	France	In operation	1,612	Green Building	Taxonomy	✓	✓
Troyes Saint-Parres	SAINT -PARRES-AUX-TERTRES	France	In operation	1,324	Green Building	CRREM	✓	✓
Vannes Est	VANNES	France	In operation	1,622	Green Building	Taxonomy	✓	✓
Metz Jouy aux Arches	JOUY-AUX-ARCHES	France	In operation	1,331	Green Building	CRREM	✓	✓
Metz Semecourt	SEMECOURT	France	In operation	1,469	Green Building	CRREM	✓	✓
Off-plan sales Porte de Choisy	IVRY-SUR-SEINE	France	In operation	4,598	Green Building	CRREM	✓	✓
Salon Provence	SALON-DE-PROVENCE	France	In operation	1,954	Green Building	CRREM	✓	✓
Valenciennes Marly	MARLY	France	In operation	1,932	Green Building	CRREM	✓	✓
EuraLille	LILLE	France	In operation	2,789	Green Building	CRREM	✓	✓



Last name	Town/City	Country	Classification 31/12/2024	100% surface areas on 31/12/2024	Eligible category	Main certification criteria	Green clause (on new leases outside France)	Accessibility <500 m
Off-plan sales Lyon Caluire	CALUIRE ET CUIRE	France	In operation	2,875	Green Building	CRREM	✓	✓
Arras	ARRAS	France	In operation	1,925	Green Building	Taxonomy	✓	✓
Nanterre	Nanterre	France	In operation	3,364	Green Building	Taxonomy	✓	✓
Châtenay-Malabry	Châtenay-Malabry	France	In operation	2,947	Green Building	Taxonomy	✓	✓
Lyon Berthelot	Lyon	France	In operation	2,605	Green Building	CRREM	✓	✓
Lens	Lens	France	In operation	1,767	Green Building	CRREM	✓	✓
Roubaix	ROUBAIX	France	In operation	2,227	Green Building	Taxonomy	✓	✓
Sophia Antipolis Le Biot	Biot	France	In operation	1,397	Green Building	CRREM	✓	✓
Sophia Antipolis Le Relais	Biot	France	In operation	1,250	Green Building	CRREM	✓	✓
Paris Est Bondy	Bondy	France	In operation	3,699	Green Building	CRREM	✓	✓
Cannes Ouest La Bocca	Cannes	France	In operation	2,340	Green Building	CRREM	✓	✓
Chevilly-Larue	CHEVILLY-LARUE	France	In operation	1,939	Green Building	CRREM	✓	✓
Bayonne Tarnos	Tarnos	France	In operation	2,135	Green Building	Taxonomy	✓	✓
Bagnolet	Bagnolet	France	In operation	2,425	Green Building	CRREM	✓	✓
Porte des Lilas	Paris	France	In operation	7,104	Green Building	Taxonomy	✓	✓
Romainville	Noisy-le-Sec	France	In operation	2,264	Green Building	CRREM	✓	✓
Torcy	Torcy	France	In operation	3,153	Green Building	CRREM	✓	✓
Couvent des Minimes	Lille	France	In operation	5,640	Green Building	CRREM	✓	✓
Crowne Plaza	Lille	France	In operation	6,300	Green Building	CRREM	✓	✓
Grand Hôtel Bellevue	Lille	France	In operation	4,000	Green Building	Taxonomy	✓	✓
Art Déco	Lille	France	In operation	1,500	Green Building	CRREM	✓	✓
Hermitage Gantois	Lille	France	In operation	7,800	Green Building	CRREM	✓	✓
Meininger Porte de Vincennes	Paris	France	In operation	7,937	Green Building	CRREM	✓	✓
Motel One Porte Dorée	Paris	France	In operation	6,233	Green Building	Taxonomy	✓	✓
Formule 1 Paris Porte de Montmartre	Paris	France	In operation	8,221	Green Building	Taxonomy	✓	✓
Ibis Bordeaux Bastide	Bordeaux	France	In operation	2,390	Green Building	CRREM	✓	✓
Ibis Budget Lille Centre Gare	LILLE	France	In operation	2,703	Green Building	CRREM	✓	✓
IBIS BUDGET Lyon Gerland	LYON	France	In operation	2,106	Green Building	CRREM	✓	✓
IBIS BUDGET Marseille Prado	MARSEILLE	France	In operation	1,852	Green Building	CRREM	✓	✓
IBIS BUDGET Paris Porte de Montmartre	Paris	France	In operation	10,474	Green Building	Taxonomy	✓	✓
IBIS BUDGET Saint Cyr l'Ecole	SAINT CYR L'ECOLE	France	In operation	1,070	Green Building	CRREM	✓	✓
IBIS BUDGET Toulouse Cité de l'Espace N 2	TOULOUSE	France	In operation	1,445	Green Building	CRREM	✓	✓
IBIS BUDGET Vélizy	Vélizy	France	In operation	2,413	Green Building	CRREM	✓	✓
IBIS Marseille Gare Saint Charles	MARSEILLE	France	In operation	5,427	Green Building	CRREM	✓	✓
IBIS Paris La Villette	Paris	France	In operation	8,218	Green Building	CRREM	✓	✓
IBIS Paris Montmartre	Paris	France	In operation	8,926	Green Building	CRREM	✓	✓
IBIS Paris Porte d'Orleans	MONTRouGE	France	In operation	10,458	Green Building	CRREM	✓	✓
IBIS STYLES Lille Centre	LILLE	France	In operation	4,141	Green Building	Taxonomy	✓	✓
IBIS Toulouse Centre	TOULOUSE	France	In operation	5,216	Green Building	CRREM	✓	✓
MERCURE Lyon Saxe Lafayette	LYON	France	In operation	8,624	Green Building	CRREM	✓	✓
MERCURE Marseille Centre	MARSEILLE	France	In operation	6,110	Green Building	CRREM	✓	✓
MERCURE Massy Gare Tgv	MASSY	France	In operation	3,330	Green Building	CRREM	✓	✓
MERCURE Paris La Defense 5	COURBEVOIE	France	In operation	18,652	Green Building	Taxonomy	✓	✓
MERCURE Paris Porte d'Orleans	MONTRouGE	France	In operation	7,846	Green Building	CRREM	✓	✓
NY Residence Budapest	Budapest	Hungary	In operation	15,185	Green Building	CRREM	*	✓
Palazzo Naiadi	Rome	Italy	In operation	23,440	Green Building	CRREM	*	✓
Dei Dogi Venezia	Venice	Italy	In operation	4,871	Green Building	Taxonomy	*	✓
Santa Lucia	Venice	Italy	In operation	5,608	Green Building	Taxonomy	*	✓
Palazzo Gaddi Florence	Florence	Italy	In operation	7,356	Green Building	Taxonomy	*	✓
NH Amsterdam	Amsterdam	Netherlands	In operation	13,600	Green Building	Taxonomy	*	✓
NH Amsterdam Noord	Amsterdam	Netherlands	In operation	14,916	Green Building	CRREM	*	✓
NH Amersfoort	Amersfoort	Netherlands	In operation	5,580	Green Building	Taxonomy	*	✓
B&B Lodz	LODZ	Poland	In operation	5,909	Green Building	Taxonomy	*	✓
B&B Warsaw	Warsaw	Poland	In operation	4,042	Green Building	Taxonomy	*	✓
DA BALAIÁ	Albufeira	Portugal	In operation	45,813	Green Building	Taxonomy	*	✓

Last name	Town/City	Country	Classification 31/12/2024	100% surface areas on 31/12/2024	Eligible category	Main certification criteria	Green clause (on new leases outside France)	Accessibility <500 m
Kimpton Fitzroy London	London	UK	In operation	21,213	Green Building	CRREM	*	✓
Kimpton Manchester	Manchester	UK	In operation	27,132	Green Building	Taxonomy	*	✓
Kimpton Edinburgh Charlotte Square	Edinburgh	UK	In operation	13,747	Green Building	CRREM	*	✓
Intercontinental Edinburgh George Street	Edinburgh	UK	In operation	13,658	Green Building	CRREM	*	✓
Kimpton Glasgow Blythswood Square	Glasgow	UK	In operation	9,841	Green Building	CRREM	*	✓
Voco Cardiff	Cardiff	UK	In operation	10,700	Green Building	Taxonomy	*	✓
Principal York	York	UK	In operation	12,466	Green Building	CRREM	*	✓
Voco Glasgow Grand Central	Glasgow	UK	In operation	20,541	Green Building	Taxonomy	*	✓
Voco Oxford Spire	Oxford	UK	In operation	13,485	Green Building	Taxonomy	*	✓
Voco Oxford Thames	Oxford	UK	In operation	12,000	Green Building	Taxonomy	*	✓

\* On new leases.

### 3.5.3 Regulatory tables related to European taxonomy

The table below presents the data relating to the taxonomy; the methodology used is detailed in Section 3.3.4.1.

#### 3.5.3.1 Revenues

Economic activities	Codes	Absolute revenues	Share of revenues	Substantial contribution criterion					
				Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems
		EUR	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL
<b>A. Activities eligible for taxonomy</b>									
<b>A.1. Environmentally sustainable activities (aligned with taxonomy)</b>									
Acquisition and ownership of buildings	CCM – 7.7	86,284,011	14.7%	YES					
<b>Revenues from environmentally sustainable activities (A.1)</b>		<b>86,284,011</b>	<b>14.7%</b>	<b>14.7%</b>	-	-	-	-	-
<b>of which enabling</b>		-	<b>0%</b>	<b>0%</b>	-	-	-	-	-
<b>of which transitory</b>		-	<b>0%</b>						
<b>A.2. Activities eligible for taxonomy but not environmentally sustainable (not aligned with taxonomy)</b>									
Acquisition and ownership of buildings	CCM – 7.7	183,806,420	34.4%	EL	N	N	N	N	N
Hotels, tourist accommodation, campsites and similar accommodation	Biodiversity – 2.1*	315,373,797	53.9%	N	N	N	N	N	EL
<b>Revenues from activities eligible for taxonomy but not environmentally sustainable (not aligned with taxonomy) (A.2)</b>		<b>499,180,217</b>	<b>85.3%</b>	%	%	%	%	%	%
<b>Revenues from activities eligible for taxonomy (A)</b>		<b>585,464,227</b>	<b>100%</b>	%	%	%	%	%	%
<b>B. Activities not eligible for taxonomy</b>									
<b>Revenues from activities not eligible for taxonomy (B)</b>		-	0%						
<b>TOTAL A + B</b>		<b>585,464,227</b>	<b>100%</b>						

\* Only the eligibility calculation is required for this year for the other four environmental objectives.

CCM = Climate Change Mitigation//CCA = Climate Change Adaptation



### 3.5.3.2 Capex

Economic activities	Codes	Substantial contribution criterion							
		Absolute capital expenditure	Share of capital expenditure	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems
		EUR	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL
A. Activities eligible for taxonomy									
A.1. Environmentally sustainable activities (aligned with taxonomy)									
Installation, maintenance and repair of equipment promoting energy efficiency	CCM/CCA – 7.3	4,940,918	3.6%	Y	Y	N	N	N	N
Installation, maintenance and repair of instruments and devices for measuring, regulating and controlling the energy performance of buildings	CCM/CCA – 7.5	126,877	0.1%	Y	Y	N	N	N	N
Acquisition and holding of buildings	CCM/CCA – 7.7	110,842,789	53.9%	Y	Y	N	N	N	N
Professional services related to building energy efficiency	CCM/CCA – 9.3	17,730	0.01%	Y	Y	N	N	N	N
Capital expenditure for environmentally sustainable activities (A.1)		113,988,289	84%	18.8%	84%	%	%	%	%
of which enabling		5,085,525	3.7%	3.7%	3.7%	%	%	%	%
of which transitory		–	0%	0%					
A.2. Activities eligible for taxonomy but not environmentally sustainable (not aligned with taxonomy)									
Acquisition and holding of buildings	CCM/CCA – 7.7	21,737,439	16%	EL	EL	N	N	N	N
Capital expenditure for activities eligible for the taxonomy but not environmentally sustainable (A.2)		21,737,439	16%	%	%	%	%	%	%
Capital expenditure for activities eligible for the taxonomy (A)		135,725,728	100%	%	%	%	%	%	%
B. Activities not eligible for taxonomy									
Capital expenditure for activities not eligible for taxonomy			0%						
TOTAL A + B		135,725,728	100%						

It should be noted that in Covivio's case, the Capex linked to real estate activities aligned with the mitigation objective are *a fortiori* aligned with the adaptation objective (3.3.4.1). Double counting is cancelled on activity 7.7, in other words, if an energy efficiency Capex (7.3) is made on an asset aligned with taxonomy (7.7), the amount of energy efficiency Capex is deducted. of total Capex in line 7.7.

Furthermore, to avoid double counting, priority has been given to activity 7.7, so that an energy efficiency Capex is only shown in the table if it relates to non-green assets related to mitigation or adaptation.

### 3.5.3.3 Opex

		Substantial contribution criterion							
Economic activities	Codes	Absolute operating expenses	Share of operating expenses	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems
		EUR	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL
A. Activities eligible for taxonomy									
A.1. Environmentally sustainable activities (aligned with taxonomy)									
Operating expenses for environmentally sustainable activities (A.1)		NC	%	%	%	%	%	%	%
of which enabling			%	%	%	%	%	%	%
of which transitory			%						
A.2. Activities eligible for taxonomy but not environmentally sustainable (not aligned with taxonomy)									
Operating expenses for activities eligible for taxonomy but not environmentally sustainable (A.2)		NC	%	%	%	%	%	%	%
Operating expenses for activities eligible for taxonomy but not environmentally sustainable (A.2)		NC	%	%	%	%	%	%	%
B. Activities not eligible for taxonomy									
Operating expenses for activities not eligible for taxonomy		NC	%						
TOTAL A + B		245,075,000	100%						

Does Not Significant Harm criteria							Share of operating expenses aligned (A.1.) Or eligible (A.2.) With taxonomy, year N-1	Category (enabling activity)	Category (transitional activity)
Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safeguards			
Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	M/T	
							%		
							%		
							%		
							%		
							%		

By carrying out a materiality exercise on all of its Opex, it was found that the Opex falling within the scope of the taxonomy represented around 4% of the Group's total Opex. This 4% was calculated on the basis of income statement lines. A more refined analysis would have resulted in a further reduction in the scope of the Opexes considered for the taxonomy.

NC = Not Calculated

NA = Not Applicable (objectives 3 to 6 not published and DNSH not analysed due to exemption)

### Taxonomic indicators and green funding

All the Capex for improving energy efficiency (activities 7.3 to 7.6) are included in the green financing framework of Covivio and Covivio Hotels, they represented €5.1 million at the end of 2024, i.e. 3.7% of the Capex totals.



## 3.6 Independent third party audit

### 3.6.1 Sustainability information certification report

To the General Meeting of Covivio Hotels,

This report is issued in our capacity as Statutory Auditor of Covivio Hotels. It covers the information on sustainability and the information provided for in Article 8 of Regulation (EU) 2020/852, relating to the financial year ended 31 December 2024 and included in the "Sustainability Report" section of the management report (hereinafter, the "Sustainability Report").

Pursuant to Article L. 233-28-4 of the French Commercial Code, Covivio Hotels is required to include the aforementioned information in a separate section of its management report. This information has been compiled in the context of the first application of the aforementioned articles, marked by uncertainties regarding the interpretation of the texts, the use of significant estimates, the lack of established practices and frameworks, particularly for the dual materiality analysis, as well as an evolving internal control system. They provide an understanding of the impact of the Group's activity on sustainability issues, as well as how these issues influence the development of the Group's business, its results and its situation. Sustainability issues include environmental, social and corporate governance issues.

In accordance with Article L. 82154 II of the above-mentioned code, our task is to carry out the work necessary to issue an opinion, expressing limited assurance, on:

- the compliance with the sustainability reporting standards adopted pursuant to Article 29b of Directive (EU) 2013/34 of the European Parliament and of the Council of 14 December 2022 (hereinafter ESRS for European Sustainability Reporting Standards) of the process applied by Covivio Hotels to determine the information published, and the respect of the obligation to consult the Social and Economic Committee provided for in the sixth paragraph of Article L. 231217 of the French Labour Code;
- the compliance of the sustainability information included in the Sustainability Report with the requirements of Article L. 233-28-4 of the French Commercial Code, including with the ESRS; and
- the compliance with the disclosure requirements of Article 8 of Regulation (EU) 2020/852.

This task is carried out in accordance with the rules of ethics, including independence, and the quality standards prescribed by the French Commercial Code.

It is also governed by the guidelines of the High Audit Authority "Certification of information on sustainability and control of the disclosure requirements of information provided for in Article 8 of Regulation (EU) 2020/852".

In the three separate parts of the report that follow, we present, for each of the areas of our mission, the nature of the audits that we carried out, the conclusions that we drew from them, and, in support of these conclusions, the elements which were the subject of particular attention on our part and the procedures we carried out in respect of these items. We draw your attention to the fact that we do not express a conclusion on these elements taken in isolation and that the procedures explained must be considered as part of the overall context of the formation of the conclusions issued on each of the three areas of our assignment.

Finally, when it appears necessary to draw your attention to one or more sustainability-related items of information provided by Covivio Hotels in its management report, we include an observation(s) paragraph.

#### Limits of our assignment

As our assignment is to provide limited assurance, the nature (choice of audit techniques) of the work, its range (scope) and its duration are less than those necessary to obtain reasonable assurance.

Furthermore, this assignment does not consist of guaranteeing the viability or the quality of the management of Covivio Hotels, in particular by making an assessment, which would go beyond compliance with the ESRS information requirements, on the relevance of the choices made by Covivio Hotels in terms of action plans, targets, policies, scenario analyses and transition plans.

However, it does allow conclusions to be drawn regarding the process of determining the sustainability information published, the information itself, and the information published in accordance with Article 8 of Regulation (EU) 2020/852, as to the absence of identification or, on the contrary, the identification of errors, omissions or inconsistencies of such material importance that they could influence the decisions that could be taken by the readers of the information which is the subject to our audits.

Our assignment does not cover any comparative data.

## **The compliance with the ESRS of the process implemented by Covivio Hotels to determine the information published, and the respect of the obligation to consult the Social and Economic Committee provided for in the sixth paragraph of Article L. 231217 of the French Labour Code**

### **Nature of audits carried out**

Our procedures also involved checking:

- the process defined and implemented by Covivio Hotels enabled it, in accordance with the ESRS, to identify and assess its impacts, risks and opportunities related to sustainability issues, and to identify those of these material impacts, risks and opportunities that led to the publication of sustainability information in the Sustainability Report; and
- the information provided on this process is also in accordance with the ESRS.

In addition, we monitored compliance with the Social and Economic Committee's consultation obligation.

### **Conclusion of the audits performed**

On the basis of the audits we carried out, we did not identify any material errors, omissions or inconsistencies concerning the compliance of the process implemented by Covivio Hotels with the ESRS.

Concerning the consultation of the Social and Economic Committee provided for in the sixth paragraph of Article L. 2312-17 of the French Labour Code, we inform you that as of the date of this report, this has not yet taken place.

### **Items that received special attention**

We present below the elements that have been the subject of special attention by us concerning the compliance with the ESRS of the process implemented by Covivio Hotels to determine the information published.

Information relating to the identification of stakeholders and impacts, risks and opportunities as well as the assessment of impact materiality and financial materiality are mentioned in paragraph 3.1.2 "General information (ESRS 2)" of the Sustainability Report.

#### **Concerning the identification of stakeholders**

We reviewed the analysis carried out by the entity to identify:

- stakeholders, who may affect the entities in the scope of information or may be affected by them, by their activities and direct or indirect business relationships in the value chain;
- the main users of the sustainability statements (including the main users of the financial statements).

With this in mind, we held discussions with the Sustainable Development Department and the persons concerned and inspected the available documentation as part of the stakeholder identification process.

In particular, we :

- assessed the consistency of the main stakeholders identified by the entity with the nature of its activities and its geographical location, taking into account its business relationships and its value chain;
- applied our critical judgement to assess the representative nature of the stakeholders identified by the organisation;
- assessed the appropriateness of the description given in paragraph 3.1.2.3.2 "Involving Stakeholders (SBM-2)" of the Sustainability Report.

#### **Regarding the identification of impacts, risks and opportunities**

In particular, we reviewed the process applied by the organisation to identify actual or potential impacts (negative or positive), risks and opportunities (IRO) related to sustainability issues mentioned in paragraph AR 16 of the "Application requirements" of the ESRS 1 standard and, where applicable, those specific to the organisation, as presented in paragraph 3.1.2.4 "Identify and manage sustainability impacts, risks and opportunities (IRO)" of the Sustainability Report.

We also assessed the scope used to identify IROs, particularly in relation to the scope of the consolidated financial statements.

We reviewed the mapping produced by the entity of identified IROs, including in particular the description of their distribution in the specific activities and the value chain, as well as their time horizon (short, medium or long term), and assessed its consistency with our knowledge of the Group.

In particular, we assessed:

- the approach used by the entity to collect information on subsidiaries;
- the consistency of the current and potential IROs identified by the entity, in particular those that are specific to it, as they are not covered or insufficiently covered by ESRS standards, based on our knowledge of the entity;
- how the organisation has taken different time horizons into account, particularly with regard to climate issues;
- whether the entity has taken into account its dependencies on natural, human and social resources in the identification of risks and opportunities.



### Regarding the assessment of impact materiality and financial materiality

We gained an understanding of the process used by the entity to assess materiality of impact and financial materiality, through interviews with management and inspection of the available documentation, and assessed its compliance with the criteria defined in ESRS 1.

We reviewed the decision-making process implemented by the entity to assess the impact and financial materialities, and assessed their presentation in paragraph 3.1.2.4.2 "Results of the double materiality analysis (IRO-2)" of the Sustainability Report.

In particular, we assessed the process implemented by the entity to determine, in terms of positive and negative impacts:

- their probability of occurrence, their magnitude, their scope;
- where applicable, for negative impacts, their irremediable nature;
- in the short, medium or long term, and the thresholds used to determine the materiality of these impacts, as presented in paragraph 3.1.2.4.2 "Results of the double materiality analysis (IRO-2)" of the Sustainability Report.

We reviewed the process conducted by the entity to determine the materiality of risks and opportunities with regard to:

- their probability of occurrence; and
- potential magnitude.

In particular, we assessed the way in which the entity established and applied the materiality of information criteria defined by ESRS 1, including those relating to the setting of thresholds, to determine the material information published:

- for the metrics relating to the material IROs identified in accordance with the relevant thematic ESRS standards;
- for entity-specific information.

### The compliance of the sustainability information included in the Sustainability Report with the requirements of Article L. 233-28-4 of the French Commercial Code, including with the ESRS

#### Nature of audits carried out

Our work consisted in verifying that, in accordance with legal and regulatory requirements, including the ESRS:

- the information provided provides an understanding of the preparation and governance processes for the sustainability information included in the Sustainability Report, including the processes for determining the information related to the value chain and the disclosure exemptions used;
- the presentation of this information ensures that it is readable and comprehensible;
- the scope used by Covivio Hotels in relation to this information is appropriate; and
- based on a selection, according to our analysis of the risks of non-compliance of the information provided and the expectations of its users, this information does not contain any errors, omissions or significant inconsistencies, i.e. likely to influence the judgement or decisions of the users of this information.

#### Conclusion on the checks carried out

Based on our audits, we did not identify any material errors, omissions or inconsistencies concerning the compliance of the sustainability information included in the Sustainability Report with the requirements of Article L. 233. -28-4 of the French Commercial Code, including with the ESRS.

#### Observations

Without calling into question the conclusion expressed above, we draw your attention to paragraph 3.1.2.1 "Sustainability reporting scope and methodology (ESRS 2 BP-1/2)" in the Sustainability Report which describes the context of first application of the European CRSD directive, marked in particular by:

- uncertainties about the interpretation of the texts, in particular concerning the treatment of greenhouse gas emissions related to the tenants of Covivio Hotels buildings;
- the estimation of part of the data on energy consumption, water and waste production and treatment;
- the first year of reporting social data for the Hotel Operating Properties.

#### Items that received special attention

##### Information provided in accordance with environmental standards (ESRS E1 to E5)

The information published under climate change (ESRS E1) is mentioned in paragraph 3.2.1 "Climate change (ESRS E1)" of the Sustainability Report.



Our procedures also involved:

- on the basis of the interviews conducted with the persons concerned, in particular the Sustainable Development Department, assessing whether the description of the policies, actions and targets put in place by the entity covers the following areas: climate change mitigation, adaptation to climate change, energy efficiency, renewable energy;
- assessing the appropriateness of the information presented in the aforementioned paragraph of the Sustainability Report and its overall consistency with our knowledge of the entity.

#### **Regarding the information published in respect of greenhouse gas emissions**

- we assessed the consistency of the scope considered for the assessment of the greenhouse gas emissions assessment with the scope of the consolidated financial statements and the upstream and downstream value chain;
- we reviewed the greenhouse gas emissions inventory protocol used by the entity to assess the presentation of its greenhouse gas emissions;
- we assessed the process of collecting information concerning Scope 3 emissions related to the energy consumption of tenants;
- we assessed the appropriateness of the emission factors used and the calculation of the related conversions, as well as the calculation and extrapolation assumptions for the most significant items, given the inherent uncertainty in the state of scientific knowledge; economic data and the quality of the external data used;
- we reconciled, on the basis of tests, the underlying data used to calculate greenhouse gas emissions with the supporting documents;
- we implemented analytical procedures;
- with regard to the estimates that we considered to be structuring, which the entity used to calculate its greenhouse gas emissions, through discussions with the Sustainable Development Department, we reviewed the methodology for calculating the estimated data and the sources of information on which these estimates are based;
- we verified the arithmetical accuracy of the calculations used to establish this information.

#### **With regard to the levers for reducing the carbon footprint presented in paragraph 3.2.1.1.2.a "Quantifiable levers", our work consisted mainly**

- reconciling, for a selection of data underlying the valuation of these levers, the information presented with the available documentation;
- examining the resources allocated (OpEx and CapEx) to climate change mitigation actions and the costing methods used.

#### **Information provided in accordance with social standards (ESRS S1 to S4)**

The information published in respect of the Company's personnel (ESRS S1) is presented in paragraph 3.3.1 "Own workforce (ESRS S1)" of the Sustainability Report.

Our main procedures on this information involved:

- examining the scope of activities on which the information was prepared, in particular for the Operating Properties scope;
- reviewing the sustainability information for the Company's employees included in the aforementioned section of the Sustainability Report. These procedures focused in particular on the policies described by the entity in respect of the Company's personnel relating to health and safety, diversity and remuneration;
- comparing the information obtained from our knowledge of the Group, with the items appearing in the consolidated financial statements and with publications relating to these subjects that we were able to identify;
- examining the methods used by the Group to implement the key concepts of the ESRS S1 standard relating to this information, such as the concept of employees or non-employees, components additional to the base salary or variable elements taken into account in the remuneration, etc.;
- defining and implement analytical procedures adapted to the information audited;
- examining the compliance of the supporting documents with the corresponding information on a selection of items of information.

#### **Compliance with the disclosure requirements of Article 8 of Regulation (EU) 2020/852**

##### **Nature of audits carried out**

Our work consisted in verifying the process implemented by Covivio Hotels to determine the eligible and aligned nature of the activities of the entities included in the consolidation.

They also involved verifying the information published pursuant to Article 8 of Regulation (EU) 2020/852, which involves verifying:

- the compliance with the rules governing the presentation of this information, which guarantee its readability and comprehensibility;
- on the basis of a selection, the absence of errors, omissions or material inconsistencies in the information provided, i.e. likely to influence the judgement or decisions of the users of this information.



### Conclusion of the audits performed

Based on our audits, we did not identify any material errors, omissions or inconsistencies regarding compliance with the requirements of Article 8 of Regulation (EU) 2020/852.

### Items that received special attention

#### Concerning the eligible nature of activities

Information concerning the eligibility of activities can be found in paragraph 3.2.6.1. "How does it comply with the European "green" taxonomy?" of the Sustainability Report.

We have assessed, through interviews and inspections of the related documentation, the conformity of the organisation's analysis of the eligibility of its activities with the criteria defined in the annexes of the delegated acts supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council.

#### Concerning the aligned nature of eligible activities

Information on the alignment of activities is provided in paragraph 3.2.6.1 above.

As part of our audits, we:

- consulted a selection of documentary sources used and conducted interviews with the persons concerned;
- analysed a selection of elements on which the management based its judgement when it assessed whether the eligible economic activities met the cumulative conditions, derived from the Taxonomy Framework, required in order to be classified as aligned;
- assessed the analysis carried out with respect to compliance with the minimum guarantees, mainly with regard to the elements collected in the context of reviewing the entity and its environment.

#### Concerning the key performance indicators and the information that accompanies them

The key performance indicators and the information accompanying them can be found in paragraph 3.5.3 "Regulatory tables related to European taxonomy" of the Sustainability Report.

With regard to total revenues and CapEx and OpEx (the denominators), presented in the regulatory tables, we examined the reconciliations made by the entity with the data from the accounting data used as a basis for the preparation. financial statements. With regard to the other amounts comprising the various indicators of eligible and aligned activities (the numerators), we:

- implemented analytical procedures;
- we assessed these amounts on the basis of a selection of assets that we determined according to the portfolio to which these assets are attached and their contribution to the indicators.

Finally, we assessed the consistency of the information in paragraph 3.5.3 "Regulatory tables related to European taxonomy" of the Sustainability Report with the other sustainability information in this report.

Paris-La Défense, 19 March 2025

The Statutory Auditors

**ERNST & YOUNG et Autres**

Pierre Lejeune

## 3.6.2 Independent third party verification - Green Bonds Covivio Hotels

### Report by one of the Statutory Auditors on compliance with the environmental and social criteria for qualifying and monitoring the assets selected for responsible bonds and on the value of the portfolio of selected assets

For the attention of the Manager,

In our capacity as auditor of Covivio Hotels (hereinafter "the Company") and in response to your request, we are pleased to present our report on the compliance of the assets selected for the responsible bonds (hereinafter 'Green Financing Bonds') with the environmental and social qualification and monitoring criteria defined in the "Use of Proceeds" criteria of the Green Financing Bonds established by the Company in June 2023 (hereinafter "Green Financing Framework")<sup>(1)</sup> and the consistency of the value of these assets with the accounting data and data underlying the accounting.

#### Preparation of information by the Company

The lack of a generally accepted and commonly used frame of reference or established practices on which to rely to evaluate and measure sustainability-related information means that different but acceptable measurement techniques can be used, which may affect comparability between entities over time.

Therefore, the information should be read and understood with reference to the Green Financing Framework available on the Company's website or on request.

#### Responsibility of the Company

It is the responsibility of the Company's management to establish the qualification and monitoring criteria defined in the "Green Financing Framework", in order to select the assets for the Green Financing Bonds in accordance with these criteria and to design, implement and maintain the internal control that it considers necessary to prepare information free from material misstatement, whether due to fraud or error.

#### Our independence and quality control

Our independence is defined by the provisions of Article L. 821-28 of the Commercial Code, the Code of Ethics for Statutory Auditors and the IESBA Code of Ethics (International Code of Ethics for Professional Accountants (including Independence Standards)).

In addition, we apply the International Standard on Quality Management 1, which involves defining and implementing a quality control system including documented policies and procedures to ensure compliance with ethical rules, professional standards and legal texts and applicable regulations.

#### The responsibility of the Statutory Auditors

It is our responsibility, on the basis of our work:

- to express a limited assurance conclusion that the assets selected by the Company for the Green Financing Bonds have been selected, in all material respects, in accordance with the qualification and monitoring criteria defined in the "Green Financing Framework";
- to certify that the value of the portfolio of selected assets is consistent with the accounting records.

It is not our responsibility to assess the alignment of the Company's Green Financing Framework with the Green Bond Principles of the ICMA (International Capital Market Association).

### 1. Limited assurance report on compliance with environmental and social criteria for qualification and monitoring

#### Professional standards applied

We conducted our work in accordance with ISAE 3000 (revised) – Assurance engagements other than audits or reviews of historical financial information published by the IAASB (International Auditing and Assurance Standards Board).

#### Nature and scope of work

We planned and performed our work in such a way as to take into account the risk of material misstatements that could call into question the claim that the assets selected for the Green Financing Bonds were established, in all material respects, in accordance with the qualification and monitoring criteria defined in the "Green Financing Framework".

To assist us in carrying out our work, we called on our experts in sustainable development, under the responsibility of Mr. Philippe Aubain, partner.

<sup>(1)</sup> June 2023 "Green Financing Framework" press release on qualification (Use of Proceeds) and reporting criteria for Green Financing Bonds available at: <https://www.covivio-hotels.fr/wp-content/uploads/sites/8/2023/10/Green-Financing-Framework.pdf>

We implemented the following procedures based on our professional judgement:

- We reviewed the procedures for qualifying and monitoring the assets selected for the Green Financing Bonds implemented in your company; and
- We assessed the compliance of the selected assets with the qualification and monitoring criteria for the most material assets, by interviewing the appropriate people in the company and by examining supporting documents.

The procedures implemented as part of a limited assurance assignment are less extensive than those required for a reasonable assurance assignment. As a result, the level of assurance obtained in a limited assurance assignment is substantially lower than that which would have been obtained if a reasonable assurance assignment had been performed.

## Conclusion

Based on the procedures we implemented, as described in the "Nature and scope of the work" section, and the information we collected, we did not identify any material misstatements that would call into question the claim that the assets selected by the Company for Green Financing Bonds have been selected, in all material respects, in accordance with the qualification and monitoring criteria defined in the "Green Financing Framework".

## Observations

Without calling into question the conclusion expressed above, we draw your attention to paragraph 2.1 "Use of Proceeds" of the Green Financing Framework, which states that:

- The qualification and monitoring criteria relate only to the environmental and social aspects of eligible assets, to the exclusion of their economic aspects. These criteria are the minimum criteria that eligible assets must meet to qualify as "Green Bonds". They concern the construction and operation phase of the assets.
- Some of the criteria can only be applied and verified once the process of implementing environmental annexes with the tenants has been completed, which is currently in progress for all assets concerned by the Green Financing Bonds.

## 2. Certification of the value of the portfolio of selected assets

As part of our statutory audit, we carried out, with the firm KMPG SA, an audit of the consolidated financial statements of the Company for the financial year ended 31 December 2024. Our audit, conducted in accordance with professional standards applicable in France, aimed to express an opinion on the consolidated financial statements taken as a whole, and not on the specific elements of these financial statements used to determine this information. We therefore did not perform our audit tests and surveys for this purpose and we do not express any opinion on these elements taken in isolation.

Our work, which does not constitute an audit or a limited review, was carried out in accordance with the professional guidelines of the French National Association of Statutory Auditors (Compagnie nationale des commissaires aux comptes) relating to this work. Our work involved, by sampling or by means of other selection methods:

- reviewing the procedures put in place by the Company to determine the value of the portfolio of selected assets net of the associated external financial debt (in proportion to the Group's holding) based on the information as at 31 December 2024;
- verifying that the value of the assets selected is consistent with the data underpinning the consolidated financial statements for the year ended 31 December 2024;
- verifying the consistency of the external financial debt associated with the selected assets with the data underpinning the consolidated financial statements for the year ended 31 December 2024 (capital remaining due at 31 December 2024 in respect of financial debts associated with the asset portfolios, allocated to the selected assets based on the LTV ratio of the corresponding portfolio);
- reconciling the Group's share of ownership, used to calculate the total value of the portfolio of selected assets net of the associated external financial debt with the Group's share of ownership, with the data underpinning the consolidated financial statements for the fiscal year ended December 31, 2024;
- verifying that the total value of the portfolio of selected assets net of the associated external financial debt (Group share of ownership) corresponds to the amount of €3.3 billion on 31 December 2024.

Based on our work, we have no matters to report as to the consistency of the value of the portfolio of selected assets with the accounting data and the data underpinning the accounting.

Paris-La Défense, 19 March 2025

One of the Statutory Auditors

**ERNST & YOUNG et Autres**

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