



**NYFOSA**

**ESG Questionnaire**

**June 2025**

## General industry

Please list the industry's three biggest sustainability (ESG)-related challenges and briefly describe the process for identifying these challenges:

Challenge 1: energy and material use

Challenge 2: sustainable supply chains

Challenge 3: biodiversity

Process: Continuous stakeholder dialogues, discussions upon reoccurring revisions of sustainability targets in connection with interim reports, discussions upon annual revision of strategy and business plan, as well as the continuous work in the company's Green Finance Committee.

Have you conducted any preliminary assessments of your company in relation to the EU Taxonomy? If so, what was the outcome?

In the preparation for the ESRS in 2027 the EU taxonomy is in scope.

On December 31, 2024, 69 buildings in the Swedish portfolio were energy class A or were among the top 15 percent most energy-efficient buildings in the national stock. In Kielo's portfolio, three properties were energy class A. Together, these properties account for 19 percent of the total property value that requires an energy declaration.

The 72 properties met the criteria for substantial contributions according to the EU Taxonomy. However, to meet the Do No Significant Harm criteria, climate risk and resilience assessments must be performed for each building. The assessments had not been carried out as per the balance-sheet date, resulting in the 72

properties not currently being considered to Taxonomy-aligned.

## Environment

List the firm's three primary risks related to climate change and if any, the firm's climate-related opportunities:

Risk 1: Change in emissions-related taxes and regulations, including insurance



Risk 2: Costs related to sudden weather conditions

Risk 3: Reputation among tenants, creditors, stock and capital market

Climate-related opportunities:

1. Opportunities related to new and improved technologies that reduce energy consumption
2. Opportunities to invest in renewable energy
3. More efficient energy and water usage

Does the firm anticipate any climate-related investments, and if so, to what extent?:

Energy efficiency

Reduce energy consumption and optimize energy efficiency, supported by technical systems and installations. Implement and prioritize renewable energy sources where possible.

Sustainable investments

Encourage initiatives to reuse materials and installations wherever possible. Use environmentally friendly and sustainable materials with a low carbon footprint in modifications and renovations.

Waste management and circular economy

Promote a circular economy by working with tenants and contractors to reduce waste and increase reuse, for example, by enabling fixtures and fittings and building materials to be reused, buildings.

Transportation and accessibility

Support sustainable transportation options for employees and visitors by providing bicycle parking areas and

electric vehicle charging stations. Work to reduce carbon emissions from transportation linked to the operations.

Biodiversity

Support the preservation of existing areas of grassland and the development of new such areas on properties to make space for pollinators. Provide rooftop or ground space for beekeeping.

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Circular Economy: how are purchases and waste managed? If the firm rely on any scarce resources, please describe what efforts are made to mitigate the risk of those resources becoming scarcer in the future, e.g. recycling, reusing substitutes or improved resource efficiency?

During 2024 Nyfosa adopts a Code of Conduct for Suppliers in Sweden. Suppliers are asked to confirm the code for procurements representing 39 per cent (FY 2024) of

the total value procured in Sweden. The only scarce resource Nyfosa rely on is fossil fuels from transportation.

**Materials use** The use of building materials and interior fittings in tenant-specific modifications or refurbishment of premises has a climate impact on several levels. The company's ability to influence how the property is remodeled or what materials are used may in some cases be limited due to tenants' specific requirements for fixtures and fittings and the design of the premises. To increase the possibility of materials being put to further use, most regional offices currently have partnerships with local reuse operators that resell building materials and equipment on the construction market. Read more about a reuse project on page 27. In cases in which reused materials are not an option, such as in new builds and extensions, Nyfosa strives to find materials that otherwise minimize the company's climate footprint. One method has been to test a new type of channel made of compressed cardboard, which has a significantly lower environmental impact than steel channels. The use of cardboard channels is a result of the knowledge the company has acquired by collecting data on materials use and waste in relation to investments exceeding MSEK 2.

Transition-related risks (for example changed customer preferences or legislation): Do you anticipate any risks or opportunities due to the transition to a carbon-neutral society? Is there any risk of the firm's offer being negatively affected? If yes, how has the firm positioned itself to handle that risk?

*Risks related to changes in regulations concerning emissions and emission allowances.*

- The cost of emission allowances is rising, which means that the company's energy costs will increase. More reporting requirements concerning carbon emissions and energy consumption from our own operations places higher demands on the possibility of gathering data in a systematic manner. This will entail transition costs. Higher insurance premiums on assets that do not reduce their energy consumption and GHG emissions.

*Risks related to transitions to new installations to reduce energy consumption and risks of more costly technology to achieve this.*

- Adapting the buildings for lower energy consumption, and thereby lower GHG emissions, will in certain cases require investing in new technologies and installations in the buildings.
- Replacing fully functioning technology with modern, more energy-efficient installations may entail higher GHG emissions to produce, transport and install. The destruction of existing installations will also have a climate impact.
- A replacement installation necessitates advance depreciation of existing equipment and costs to install the new one.

Have you set a target to become carbon neutral? If so, how have you defined carbon neutrality?

Although no target has been set yet, Nyfosa works in accordance with Carbon Law and endorses the declaration of Fossil Free Sweden, which aims to halve carbon emissions from the construction and civil engineering sector between 2020 and 2030, halving them again between 2030 and 2040 to finally become climate neutral in 2045.

Please list the firm's (1-2) primary means of making a positive environmental impact or minimising negative environmental impact. Please list the corresponding most relevant UN Sustainability Development Goals. What proportion of sales can be directly linked to selected UN SDGs?

Mean 1: energy use (kWh / sqm) to be reduced by 10 per cent by 2025, compared to 2020

Mean 2: In 2025, Scope 3 screening will be conducted to establish a base year for carbon emissions.

SDG Goals: 7,11,13

Proportion of sales directly linked to selected UN SDG:s: the company has not linked revenue to the UN SDG:s

## Social

Does the firm have a history of accidents? If so, how have these been managed? Are there any preventive measures, such as policies?

Nyfosa has had no history of accidents. The company offers several health-promoting benefits including health checks, medical expenses insurance, preventive counseling and advice, as well as a fitness allowance.

Nyfosa adopts a Code of Conduct for Suppliers to ensure that the working conditions at the companies that supply goods and services to the company fulfill the stipulated requirements in terms of work environment and ethical standards and that the assignment is conducted in an environmentally conscious manner.

If applicable, please state your targets for gender and cultural equality and indicate the relative split of men/women at every level of the firm, particularly the Board of Directors and management team.

%	Male	Female
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BoD	57	43
Mgmt	33	67
Other	43	57*

- As of December 31, 2024.

Does the company conduct any other community engagement activities aside from those directly connected to the business?

Community engagements include the Real Estate Club at the Royal Institute of Technology and local sports associations.

Nyfosa also collaborate with the higher education institutions by having students have their scheduled internship within our organization. This is to contribute with practical knowledge that students then benefit from in their further studies and career.

How often does the firm conduct audits of its suppliers and how often do you discover incidents not compliant with your code of conduct?

In 2021, a code of conduct was adopted for Nyfosa's suppliers. For 2024, 39% of procurements made during the year was from suppliers who had confirmed the code. An audit of the suppliers' compliance has not been conducted.

Please list the firm's (1-2) primary means of making a positive social impact or minimising negative social impact. Please list the corresponding most relevant UN Sustainable Development Goals. What proportion of sales can be directly linked to selected UN SDGs?

Mean 1: The corporate culture is characterized by an open and stimulating work environment, with a large amount of trust and participation. The company regards having the conditions to influence your own situation and plan your own work, for example, with the possibility of flexibility in the form of hybrid work, as a key to health and wellbeing. This also makes it possible for employees to combine parenthood with working life

Mean 2: Nyfosa works actively to ensure skills development and supply of resources. A key part is permitting employees to grow within the organization with gradually increasing responsibility. Nyfosa conducts regular internal training in relevant issues and during the year, courses were conducted on several topics, including IT security and rental and contract law.

UN SDG: 8

Proportion of sales directly linked to selected UN SDGs: Not measured.

## Governance

Do all staff members receive continuing education on anti-corruption? Is there an external whistle-blower function? Are there any ongoing or historical incidents involving corruption, cartels or any other unethical business conduct? Have any preventive measures been taken?

Nyfosa's organization must always act credibly, honestly, and transparently. There is an expectation that our employees, business partners and

others with whom the company does business with, and who have concerns about fraud, corruption, or other infractions within Nyfosa's operations, express their suspicions. Suspicions of irregularities can be reported anonymously through a whistleblower function, which is accessed via the company's website and intranet.

CONFIRMED INCIDENTS OF CORRUPTION AND ACTIONS TAKEN				
	2024	2023	2022	2021
No.	0	0	0	0

Please state the firm's business tax residence (i.e. where the firm pays tax) and explain why that specific tax residence was chosen:

The company pay's tax in the countries that it operates in; Sweden, Finland and Norway.

How many independent members sits on the Board of Directors?

5 independent members.

Please state if and to what extent, the company has transactions with related parties:

N/A

Which KPIs dictate the remuneration to management (are sustainability and diversity goals included)?

See on Nyfosa's page <https://nyfosa.se/en/corporate-governance/remuneration/> and the remuneration report.

Describe the company's process for monitoring and reporting ESG issues and performance to senior management/the Board. In your

response, please confirm what KPIs



are monitored (if any) and how frequently reporting is undertaken.

Sustainability targets are evaluated four times per year in connection with interim reports. Governance of sustainability matters is described on page 56 in Annual Report 2024.

Have you signed a Union agreement:

No

## **Principle Adverse Impacts (numeric answers):**

For FY 2024:

- Income (SEKm): 3,670
- Greenhouse gas emissions; Scope 1, Scope 2, Scope 3
  - Scope 1: 777
  - Scope 2: 6,242
  - Scope 3: 2,780
- Share of non-renewable energy consumption: Of the energy purchased in 2024, 68 percent derives from renewable energy sources in the Swedish and Finnish operations.
- Share of non-renewable energy production: N/A
- Energy consumption in GWh: 283
- Tonnes of emissions to water: N/A
- Tonnes of hazardous waste and radioactive waste generated: N/A
- Unadjusted gender pay gap:
- Board gender diversity: 3 women / 4 men

## **Principle Adverse Impacts (yes/no answers):**

- Fossil fuel operations: No

- Sites/operations located in or near to biodiversity sensitive areas where activities negatively affect those areas:
- Science based target: No
- Reports to CDP: No
- UN Global Compact Signatory: Yes
- Involved in the manufacture or selling of controversial weapons: No
- Whistle blower policy: Yes
- Supplier code of conduct: Yes