



# **Habitat Inmobiliaria – ESG Policy**

Rev 0

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# 1.- Introduction

The Management Board of PROMOCIONES HABITAT, S.A.U., (hereinafter, together with its subsidiaries and investees, referred to as “**HABITAT**” or the “**Company**”) is responsible for the non-delegable task of determining the Company’s strategy and corporate policies, and for the supervision of its internal control systems. The Management Board, in the exercise of its duties and in accordance with our Code of Ethics, adopts the present ESG Policy as a subsequent commitment to the responsible action and management of HABITAT’s activities and resources.

## 1.1.- Purpose

The purpose of this Policy is to establish HABITAT’s overall framework for action and reference to the remaining policies which develop Environment, Social and Governance (hereinafter “**ESG**”) aspects, in order to: i) generate long-term sustainable value for HABITAT’s investors, clients, associates, employees and stakeholders, with a high quality product in accordance with the client’s demands and needs; ii) prevent and mitigate the possible negative impacts derived from its activities; iii) improve the Company’s reputation.

The present Policy falls into line with HABITAT’s commitment to comply with the ten principles of the United Nations Global Compact with regards to human, labour and environmental rights and the fight against corruption and to contribute to the achievement of the United Nation’s 17 Sustainable Development Goals (SDGs),

## 1.2.- Scope

The present policy is applicable to all activities undertaken by HABITAT and must be complied with by all employees (permanent and temporary), managers and members of the Board of Directors. Also, in accordance with the principle of proportionality, this Policy shall be shared with every third party acting on behalf of the Company and any third party that provides a service to HABITAT and/or is related in any way to HABITAT, (hereinafter, referred to together as “**Subject People**”).

# 2.- General Principles of Action

In accordance with the present policy, the principles that will guide the action undertaken by HABITAT and the Subject People are:

## 2.1.- Environmental Area

**Environmental Protection** – As part of its commitment to environmental protection, and from a preventive approach in order to reduce the impact on environment of its operations, HABITAT seeks to obtain the maximum feasible level of environmental efficiency in all its property developments. HABITAT also fosters responsible sourcing, circular economy, and biodiversity conservation; and extends its commitment to environmental performance improvement to its suppliers.

**Fight against Climate Change and Resiliency** –Adaptation to climate change and the mitigation of risks and impacts related to the developments and derived from the different climate change scenarios are a priority to HABITAT.

## 2.2.- Social Area

**Safety and Health** - HABITAT considers the safety and health of its employees and clients a strategic priority in its business model., which implements not only in its work centres and products (dwellings) but also extends this priority to the external work centres it can influence.

**Respect for Human Rights** – HABITAT respects and contributes to the protection of human rights and civil liberties contained in the Universal Declaration of Human Rights, including freedom of association and equal opportunities and non-discrimination, in order to ensure it is not complicit in any form of abuse or infringement of the mentioned rights.

**Value Generation for the Society** – HABITAT seeks to add value in its operational geographical areas, promotes the development of the community and undertakes consultations with local communities. HABITAT achieves this by developing a business model which covers a basic social need, housing, and which improves the quality of life of people and contributes to local development.

**Interaction with Stakeholders** – Communication and dialogue are the foundations of HABITAT’s relations with its stakeholders in order to understand their needs and meet their expectations.

## 2.3.- Governance Area

**Ethics** – HABITAT, in the exercise of its activities, complies with the values and principles of action contained in its Code of Ethics, and with the compliance policies that complement it.

**Transparency of Information:** HABITAT facilitates transparent, truthful and rigorous information to its stakeholders.

**Regulatory Compliance and Respect for the Law** – Every member of HABITAT, in the exercise of its activities, shall fully comply with the legislation in force.

**Risk and Opportunity Management Culture** – HABITAT includes the analysis and assessment of risks and opportunities within its strategy and decision-making processes.

# 3.- Approval, Review and Distribution

## 3.1.- Approval and Review



The approval and review, if applicable, of the present Policy is a responsibility of HABILAT's Management Board.

### **3.2.- Distribution**

The present Policy will be made available on HABILAT's corporate web page and on its Intranet.