

Habitat Inmobiliaria – Environmental Policy

Rev 0



TABLE OF CONTENTS

1 Introduction	3
1.1 Purpose	3
1.2 Scope	3
2 General Principles of Action	3
2.1 Eco-eficciency and Carbon Footprint	3
2.2 Climate Change and Resiliency	3
2.3 Circular Economy	4
2.4 Biodiversity	4
2.5 Improvement, Communication, Collaboration and Awareness	
3 Approval, Review and Distribution	5
3.1 Approval and Review	5
3.2 Distribution	5



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 Environmental Policy as a subsequent and strong commitment to environmental protection.

1.1.- Purpose

The purpose of the present Policy is to establish HABITAT's overall framework for action in order to achieve low-carbon property developments models. Therefore, and in line with the target set by the EU to be climate-neutral by 2050, HABITAT introduces as a core strategic line the mitigation of Climate Change through the reduction of carbon footprint and GHG (Greenhouse Gases) emissions related to the activities of the Company. HABITAT will always seek to obtain the highest sustainable level of energy-efficiency and of reduction of water footprint in all its property developments, in its regional units and points of sale.

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, (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.- Eco-efficiency and Carbon Footprint

- ▲ Improving the energy-efficiency of our developments, branch offices and points of sale in order to reduce the greenhouse gases (GHG) emissions and the consumption of natural resources.
- Promoting the decarbonisation of property developments and reducing the carbon footprint of the Company; promoting the use of renewable energy and optimizing the energy demand required by developments.
- A Reducing water footprint in developments to ensure water future.

2.2.- Climate Change and Resiliency



- ▲ Managing the regulatory, reputational and market risks related to climate change in our activities, including them in HABITAT's risk map and including, where appropriate, opportunities management.
- ▲ Managing risks and physical impacts of developments derived from the different scenarios of climate change, with the aim of taking the necessary measures to ensure the business adaptation to the physical and transitional expected changes.

2.3.- Circular Economy

- Promoting responsible sourcing by considering the environmental impact and the compliance with ESG criteria of the selected suppliers and by the purchase of the necessary materials/resources for the product (our dwellings), the process (its execution) and the development of activities in the offices. Priority shall be given to the use of materials that (among other requirements): (i) itemize its potential impacts on human health and environment; (ii) are non-toxic (low volatile organic compound emissions); and that are easily recyclable and count on a high level of, renewable and recycled material.
- ▲ Promoting the implementation of circular economy in the property developments, taking into account the life cycle of materials during the design and materials specification phase, prioritizing the use of sustainable materials and promoting the development and use of products with an environmental product declaration in our property developments.
- ▲ Efficiently using natural resources and raw materials, minimizing the generation of solid and hazardous waste in the works undertaken and responsibly managing such waste where complete disposal is not feasible.

2.4.- Biodiversity

- ▲ Incorporating biodiversity conservation in the business strategy, as a key element in the decision-making process when related to design, implementation, and property operations.
- ▲ Maximising the potential of biodiversity in each location under the principles of conservation and protection, considering the infrastructure in terms of biodiversity as an investment that constitutes an asset and shall be measured and monitored.

2.5.- Improvement, Communication, Collaboration and Awareness

- ▲ Monitoring the environmental performance of HABITAT's activities.
- ▲ Reporting (regularly and objectively) the environmental performance and the impact of our activities
- ▲ Minimising environmental impact of our residential developments by achieving the involvement of all key players, stakeholders consultation and the collaboration with public and private organisations and institutions.



▲ Developing conscience and awareness raising activities for employees, clients and other stakeholders with regard to eco-efficiency and fight against climate change.

3.- Approval, Review and Distribution

3.1.- Approval and Review

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

3.2.- Distribution

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