

ENVIRONMENTAL, SOCIAL & GOVERNANCE (ESG) POLICY

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August 2025

Group ESG

Version control

Date	Responsible	Change Description
19 Oct 2020	Group ESG	Initial Release
22 Mar 2023	Group ESG	<ul style="list-style-type: none"> Rewritten to incorporate relevant content from various ESG-related policies across the enlarged Group: ARA, ESR and LOGOS. Rewritten to refresh ESG Vision & Mission and ESG Framework. Rewritten to refresh content guided by global ESG commitments and ratings. Inclusion of Appendices A, B and C on individual policies related to: <ol style="list-style-type: none"> Appendix A – Human Centric (Social) Appendix B – Property Portfolio (Environmental) Appendix C – Corporate Performance (Governance)
26 Feb 2024	Group ESG	Added footnote on Policy Appendix A7. Employee Handbook: **Handbook subject to applicable local guidelines and practices; please refer to your local employee handbook for details
22 Aug 2025	Group ESG	<ul style="list-style-type: none"> Reformatted Recategorisation of Appendix Content and inclusion of Appendix D (Other Corporate Policies) Revisions to sections 3, 4, 5 and 8

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**Corporate Policies across the Group which are related to the Group's material ESG issues and are available on the corporate website and/or MyESR intranet*

***Policy development/update in progress*

1. INTRODUCTION

- 1.1 ESR Group Limited and its subsidiaries (collectively, “**ESR**” or the “**Group**”) has developed this Environmental, Social and Governance (“**ESG**”) Policy (“**Policy**”) to articulate our commitment to managing our business in a sustainable manner through integrating ESG considerations across our business.
- 1.2 This ESG Policy is prepared in alignment with Group’s ESG Framework, ESG 2030 Roadmap and all related policies outlined in the appendices to form the Group’s ESG commitment and approach. The policy encompasses all the ESG components and aims at providing direction and consensus across the Group on how to implement our ESG initiatives in accordance with core values, purpose, and objectives.

2. COVERAGE

- 2.1 The Group integrates ESG considerations in our business activities with the view to manage scarce natural resources, to minimise our environmental footprint, our greenhouse gas emissions and impacts on biodiversity and land use change, to take care of the health, safety and well-being of our people, be they employees, workers, contractors or the community, and to uphold strong and effective corporate governance while striving to achieve financial returns for our investors. This ESG Policy is applicable to ESR and its related entities.

3. SCOPE, RESPONSIBILITY AND AUTHORITY

- 3.1 This policy and its relevant appendices apply to all ESR-controlled activities and operations, including its fund management and development platforms in all its markets of operation. Where necessary, certain deviations are made subject to prevailing local regulations or market conditions. Under these cases, some policies are not applicable to certain business entities, which should comply with their local ESG policies with stricter provisions.
- 3.2 The implementation of this policy is the responsibility of all ESR employees. This will enable the continuous improvement of our ESG performance through the enhancement of skills, knowledge, and commitment of our employees at all levels of the organisation. This ESG Policy is endorsed by ESR’s Group Co-CEOs and approved by ESR’s Board of Directors (“Board”). It will be reviewed every two years, at a minimum, by ESR’s ESG Committee.
- 3.3 Our commitments to sustainable development are underpinned by robust governance with oversight from our highest governance body, the Board of Directors.

Board Statement – As a leading Asia-Pacific real asset owner and manager, ESR believes ESG is our corporate responsibility as we actively integrate ESG factors into every aspect of our business operations. The Board provides the overall stewardship and strategic direction on sustainability management. Working closely with the Group Executive Leadership team and supported by the ESG Committee, the Board ensures that material ESG factors are integrated within the Group’s business and oversees the delivery of ESG performance against established targets. The Board continues to steer the Group forward in the execution of our ESG Strategy and ESG 2030 Roadmap, as we transit to a more inclusive, low-carbon and climate resilient future.

4. VISION AND MISSION STATEMENT

- 4.1 We are committed to working closely with all our stakeholders – both internal and external –to achieve shared business goals that also align with our core values:



EXCELLENCE



INCLUSION



ENTREPRENEURSHIP



SUSTAINABILITY

- 4.2 Our ESG Vision and Mission Statement are driven by our core values to achieve long-term sustainable growth:



We aspire to be a leading provider of Space and Investment Solutions for a Sustainable Future.



To drive long-term sustainable growth of the business by creating positive impact on the environment, our stakeholders and the communities around us.

5. INTEGRATION OF ESG CONSIDERATIONS INTO OUR MISSION

- 5.1 We are committed to integrating ESG considerations across the real asset development cycle of our activities and upholding our high standards of diligence, transparency, and accountability. We are committed to working in compliance with the local regulations and international standards and in continuous collaboration with our internal and external stakeholders with the view to contribute to a sustainable and successful business.
- 5.2 We aim to achieve the highest standards of corporate governance which are crucial to our development and safeguarding the interests of our shareholders. At ESR we believe a culture of strong corporate governance provides the foundation for sustained and balanced growth over

the long term. We recognise the importance of our environmental, social, transparency and accountability responsibilities to our stakeholders to manage risks, make effective decisions and create value.

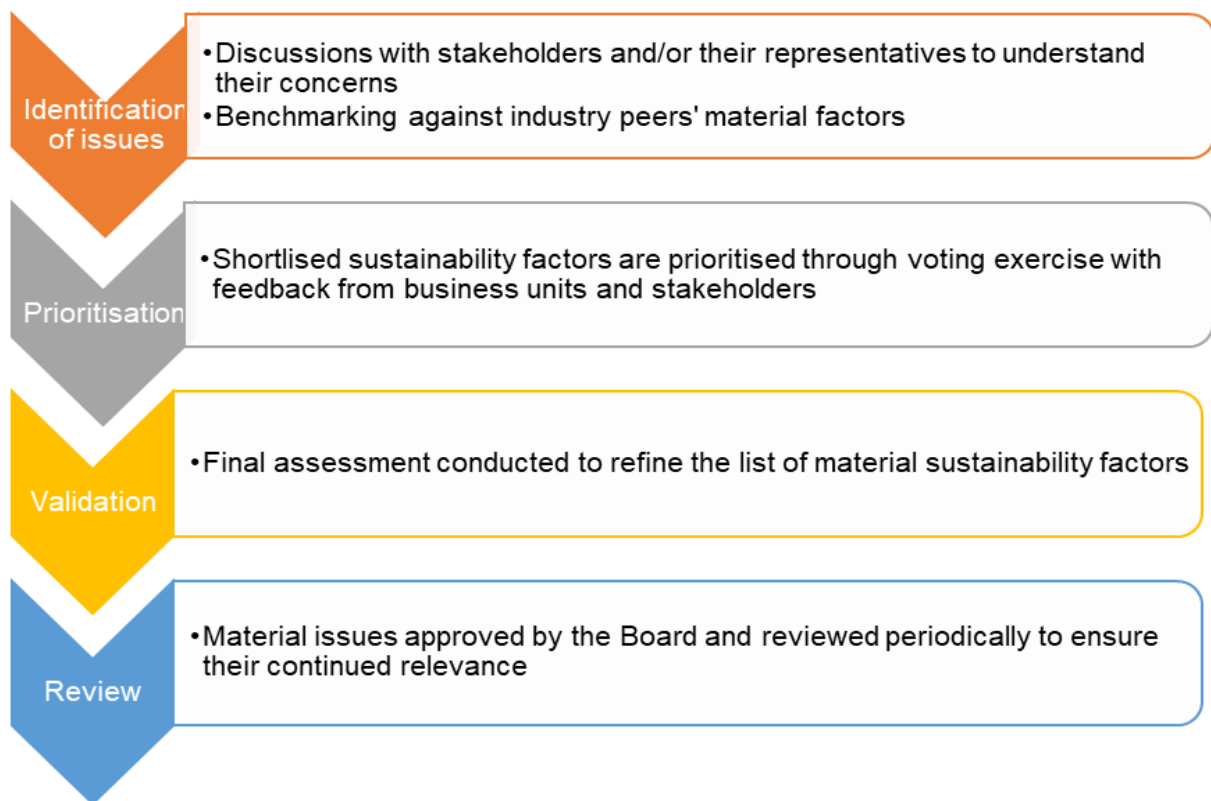
5.3 Across the various aspects of our business, we incorporate ESG factors by putting in place best practices, setting goals and monitoring performance as guided by the Group's ESG Policy:

- (a) Product Development – ESG considerations are integrated into the product development stages of our assets, from site selection to property design and construction. Assets in our portfolio are developed in accordance with applicable governance codes and construction standards. Development of product offerings are customised to investors' needs, including meeting their ESG requirements which are linked to quantifiable outcomes.
- (b) Capital Raising – Establishment of strategic partnerships with stakeholders during capital raising, including obtaining Green Financing in the form of green loans and bonds.
- (c) Investment & Capital Management – Investment, portfolio management and fund structuring, including performing impact investing analysis and due diligence to identify ESG related risks. The principles of responsible investing are incorporated within our investment and asset management policies and practices.
- (d) Asset Management – Management of assets by teams with competencies across various property markets and sectors, including focusing on various ESG aspects in the asset management activities.
- (e) Property Management – In-house local teams equipped with operational expertise, with their key performance indicators linked to sustainability and reporting auditable ESG information to stakeholders.

5.4 In addition, the Group strives to incorporate best-in-class technologies, smart building features and data analytics into the design, construction and management of our assets. The Customer Solutions & Partnerships team engages our stakeholders to understand their needs and develop sustainable assets incorporated with cutting-edge technologies to optimise asset performance and productivity.

6. STAKEHOLDER ENGAGEMENT AND MATERIALITY PROCESS

- 6.1 Our materiality process focuses on material ESG issues, opportunities, and risks from the perspectives of our stakeholders. Key stakeholder groups are identified based on their ability to impact or be impacted by our operations and sustainability. Regular engagement with our stakeholders helps us refine our material areas of focus, as well as identify and manage our positive and negative impacts. Our stakeholders include tenants, customers, employees, investment partners, shareholders, suppliers, and communities.

















- 6.2 Following the four-step process, material issues are identified based on relevance to our business, likelihood and impact and influence on stakeholders' decisions.

7. ESG FRAMEWORK

- 7.1 Our ESG framework covers three key pillars – Human Centric, Property Portfolio and Corporate Performance – supported by 15 focus areas material to our business, to drive our sustainability performance. Strategic initiatives and targets are in place for each focus area.
- 7.2 Our vision for sustainable development and ESG Framework is aligned to six of the Sustainable Development Goals (“SDGs”) from the United Nations 2030 Agenda, as well as the United Nations-supported Principles for Responsible Investment (“UN PRI”), which guide our business strategies

towards sustainability and help us achieve our overall mission. These are listed below each of the corresponding three pillars below:

THREE ESG PILLARS		
 HUMAN CENTRIC <p>Basic human needs are universal. As we strive to create a safe, supportive and inclusive environment for all employees, customers, suppliers and communities, meeting those needs today while ensuring they can be met in the future is the cornerstone of sustainable development.</p>	 PROPERTY PORTFOLIO <p>Sustainability is central to our mission because we aspire to improve the environmental prospects of our planet. We are committed to environmental stewardship by developing and maintaining sustainable and efficient buildings.</p>	 CORPORATE PERFORMANCE <p>Strong corporate performance is the foundation upon which we will achieve sustained and balanced growth giving rise to stable and dependable returns over the long-term. We embrace the highest standards of governance and ethics in all aspects of business conduct.</p>
15 FOCUS AREAS		
 STAKEHOLDER ENGAGEMENT <p>Conduct engagement initiatives with our stakeholders such as investors, business partners, tenants, and communities to enhance our deliverables</p>	 SUSTAINABLE & EFFICIENT OPERATIONS <p>Maximise the generation of renewable energy from our properties' roof space, being the largest in APAC, and pursue potential business initiatives which focus on the funding and managing of green energy. Pursue a structured and well-planned decarbonisation plan for the entire portfolio in the longer term, with milestone targets</p>	 RESPONSIBLE INVESTMENT <p>Commit to the UN PRI as a signatory and adopt its investment and asset management policies to enhance transparency and demonstrate our commitment to including ESG factors in investment decision making and ownership</p>
 SAFETY, HEALTH & WELL-BEING <p>Maintain a safe working environment by achieving Zero ESR Workforce Fatalities and promoting the holistic well-being of our people</p>	 SUSTAINABLE BUILDING CERTIFICATIONS <p>Increase sustainable building certifications across all markets and accelerate in green financing to support continued business growth and align our portfolio towards facilitating transition to a low-carbon economy</p>	 CORPORATE GOVERNANCE <p>Maintain the highest standards of corporate governance throughout the enlarged Group, with strong core values and business ethics</p>
 MANAGING & DEVELOPING TALENT <p>Aspire to be an Employer of Choice and drive an employee engagement programme with a strong focus on workplace satisfaction, talent retention and training</p>	 CLIMATE CHANGE RESILIENCE <p>Manage and mitigate climate-related risks and assess the impact of the future cost of climate change to the business, in alignment with the core elements of the Taskforce on Climate-related Financial Disclosures (TCFD)</p>	 DISCLOSURE & REPORTING <p>Actively participate in sustainability ratings and benchmarks to measure our ESG performance and disclosure against industry peers</p>

 DIVERSITY, EQUITY & INCLUSION <p>Commit to fostering workplaces that embrace diversity and are free from discrimination, and achieve a gender ratio target as part of the overall diversity & inclusion plan with monitoring actions and progress</p>	 FLEXIBLE & ADAPTABLE PROPERTIES <p>Design, construct and maintain the Group's assets to reduce material degradation</p>	 RISK MANAGEMENT <p>Conduct a holistic risk management process to focus on strategic, financial, operational, technology and compliance risks, which cover sustainability and climate change factors, amongst others, to enable more informed business decisions</p>
 COMMUNITY INVESTMENT <p>Enhance community involvement and philanthropic activities through a series of planned activities involving our stakeholders</p>	 STRATEGIC LOCATIONS <p>Build assets in strategic locations, with a sustainability focus on site selection, efficient design, green construction, and energy-efficient operations</p>	 SUPPLY CHAIN MANAGEMENT <p>Incorporate ESG considerations as part of supply chain management on areas relating to sustainable procurement, operational resilience, and sustainability performance of suppliers</p>
ALIGNMENT TO GLOBAL COMMITMENTS		
<div>    </div> <ul style="list-style-type: none"> • SDG 3: GOOD HEALTH & WELL-BEING Ensure healthy lives and promote well-being for all at all ages. • SDG 5: GENDER EQUALITY Achieve gender equality and empower all women and girls. • SDG 8: DECENT WORK AND ECONOMIC GROWTH Promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all. 	<div>    </div> <ul style="list-style-type: none"> • SDG 7: AFFORDABLE AND CLEAN ENERGY Ensure access to affordable, reliable, sustainable, and modern energy for all. • SDG 9: INDUSTRY, INNOVATION AND INFRASTRUCTURE Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation. • SDG 13: CLIMATE ACTION Take urgent action to combat climate change and its impacts. 	<div>   </div> <p><i>Signatory of:</i></p> <p>PRI Principles for Responsible Investment</p> <ul style="list-style-type: none"> • SDG 8: DECENT WORK AND ECONOMIC GROWTH Promote sustained, inclusive, and sustainable economic growth, full and productive employment and decent work for all. • UN PRI ESR recognises the value of responsible investment, and we are committed to act in the best long-term interests of our stakeholders. Adopting the UN PRI principles, the Group is committed to be a responsible real assets fund manager. Please refer to Appendix C.14: Responsible Investment Policy for more details on our commitments to UNPRI.

Pillar 1: Human Centric (Social)

(a) Actions

- i. We commit not only to providing safe workplaces but also to promoting the holistic well-being of our people with due consideration for the importance of a healthy work-life balance.
- ii. We are committed to fostering workplaces that embrace diversity and are free from discrimination on the basis of gender, age, religion, ethnicity, disability, sexual orientation, family status or any other personal characteristics.
- iii. We aspire to be an Employer of Choice to facilitate talent attraction, retention, and

training. As part of this we seek feedback on workplace satisfaction via surveys.

- iv. We work closely with our supply chain to ensure that the employees of our contractors enjoy the same standards of protection as we expect for our own people.
- v. We create safe and quality workplaces for people working in or visiting our property sites and office properties through following contractor management and occupational health and safety practices aligned with good international standards.
- vi. We care for the health and safety of our project workers, building users and community. We adopt a sustainable approach at the design stage of new construction and refurbishments by integrating building material attributes and occupant well-being assessments.
- vii. We aim to include, to the extent possible, natural lighting, active design features and indoor air quality monitoring in our facilities, and to select sustainable sites that facilitate active transport, such as walking, cycling, or using public transportation.
- viii. We are committed to enhancing gender balance and empowering women in our workforce.
- ix. We engage proactively with our stakeholders, in particular our employees, tenants, and suppliers in the areas of health and safety, sustainable procurement, and resilience to maximise stakeholder satisfaction. We engage our tenants through regular surveys to better understand their needs and preferences.
- x. We are committed to engaging with our local communities and facilitating opportunities to contribute positively to their well-being.

- (b) Please refer to Appendix A for all relevant policies related to this section.

Pillar 2: Property Portfolio (Environmental)

(a) Actions

- i. We manage natural hazards, climate and extreme weather risks at the design, development, construction, and operations stages of our properties and in our asset management practices to increase our resilience.

- ii. We aim to maximise the generation of renewable energy from our properties' roof space and pursue potential business initiatives which focus on the funding and managing of green energy.
- iii. We aim to pursue a structured and well-planned decarbonisation plan for the entire portfolio in the longer term, with milestone targets.
- iv. We aim to increase green building certifications that focus on high-performance, low carbon buildings and spaces, for new developments across all asset classes and markets.
- v. We are embarking on a climate impact study and are taking the steps toward aligning with the core elements of the International Financial Reporting Standards ("IFRS")' *S2 Climate-related Disclosures*.
- vi. We optimise, to the extent commercially reasonable, the ESG features of our new or existing developments through site selection, green design initiatives or by positioning our properties to minimise their environmental impact in terms of land use change, biodiversity protection, and proximity to transport systems, while providing cost benefits to our customers and long-term social considerations to the local community.
- vii. We are committed to reducing the life-cycle environmental impacts of our assets, including greenhouse gas emissions, energy, water, and waste footprint, as well as material degradation, by incorporating green standards and practices in the design, development, construction, and operations stages, as well as of our corporate operations.
- viii. We protect the biodiversity and high-ecological value habitat of our development sites and properties, through conservation, enhancement, or offsets.
- ix. We are committed to meet recognised sustainable design and green construction standards to embrace smarter ways to reduce our environmental impact. This includes consideration of existing developed infrastructure, potential for multi- modal transit networks and redevelopment opportunities during the site selection stage.
- x. We consider environmental and health impacts during material selection. To reduce

material degradation, we source responsible materials wherever possible within reasonable budget and allowance, including locally extracted materials, recyclable materials, and low-emitting VOC materials.

- xi. We are committed to minimising environmental impacts, including air, light and noise impact to the surrounding community during design, development, construction, and operation stages.

(b) Please refer to Appendix B for all relevant policies related to this section.

Pillar 3: Corporate Performance (Governance)

(a) Actions

- i. We have established robust processes and operating procedures to manage risks, make effective decisions and create value during our due diligence, development, and asset management processes, while remaining transparent and accountable to our investment partners and stakeholders, recognising fiduciary duties. This includes a comprehensive ESG investment checklist ("**Scorecard**") incorporated into the Investment Memo, which is reviewed and approved by the Investment Committee.
- ii. We mitigate the risk of conflicts of interest and fraud through the use of independent third parties such as fund administrators and the use of technology available to us. We believe that our information technology platform improves our operational efficiency and provides high quality internal governance controls.
- iii. Our Board is responsible and has general powers over the management and conduct of our business and oversees our overall risk control. Any significant business decisions involving material risks, including sustainability and climate change factors, are reviewed, analysed, and approved at the board level to ensure a thorough examination of the associated risks at our highest corporate governance body.
- iv. We engage qualified, reputable, and independent third parties to assist us in managing our operational risks and have in-house personnel that review our internal control measures on a continuing basis.
- v. We maintain a zero-tolerance approach to bribery and corruption and require all ESR employees to comply with our Code of Conduct and Business Ethics at all times and

provide an annual attestation which is tracked in our compliance and risk management system ComplyESR. This platform monitors corporate governance performance across all ESR offices.

- vi. We actively participate in sustainability ratings and benchmarks to align and measure our ESG performance and disclosure against global best practices and industry peers.
- vii. We incorporate ESG considerations as part of supply chain management on areas relating to sustainable procurement, operational resilience, and sustainability performance of suppliers.
- viii. We ensure the accuracy and reliability of our ESG data by establishing data management systems, streamlining ESG data collection processes, and developing policies while setting annual performance targets and reviews. We will also maintain robust ESG data disclosure in our annual ESG report that is aligned with best practices including the Global Reporting Initiative (“GRI”) Standards.
- ix. We support the market-uptake of new, innovative ESG-related technologies and practices where appropriate and keep up with emerging regulations.
- x. We implement robust responsible investment practices to enhance transparency and accountability, and mitigate environmental and social risks and leverage opportunities where available in the interest of stakeholders and investment performance.
- xi. We provide best-in-class developments for the new economy.

(b) Please refer to Appendix C for all relevant policies related to this section.

8. TARGETS AND PERFORMANCE

- 8.1 The Group harmonises its operational measurements across its business operations and aggregating future asset development and operations to establish and monitor its ESG targets. Based on our ESG framework, we have established nine targets that will drive our performance towards our ESG objectives aligned with the Group’s ESG 2030 roadmap. We will continue to refine our strategy by evaluating our progress against our targets:

PILLAR 1: HUMAN CENTRIC	PILLAR 2: PROPERTY PORTFOLIO	PILLAR 3: CORPORATE PERFORMANCE
<ul style="list-style-type: none"> Maintain a safe working environment by targeting Zero ESR Workforce Fatalities. 	<ul style="list-style-type: none"> Set up 1,000 MW of solar power capacity on the rooftop of assets. 	<ul style="list-style-type: none"> Achieve a 3-Star GRESB rating average.
<ul style="list-style-type: none"> Achieve and maintain gender ratio of 50/50 women/men. 	<ul style="list-style-type: none"> Attain sustainable building certifications and ratings for 50% of the Group's portfolio. 	<ul style="list-style-type: none"> Maintain a culture of strong Corporate Governance.
<ul style="list-style-type: none"> Creation of an ESR Group Foundation programme with an investment capacity of up to US\$20 million 	<ul style="list-style-type: none"> Reduce energy consumption intensity in line with the Group's decarbonisation roadmap and net zero commitment. 	<ul style="list-style-type: none"> Adhere to UN PRI principles in our investment and asset management policies and practices.

8.2 The Paris Agreement has set the stage for mitigating climate change with countries committing to cap global warming to well below 1.5 degrees celsius to lessen the impact on the Earth. To achieve this, setting quantifiable targets such as Net Zero Carbon ("**NZC**") emissions by 2050 is essential and is adopted by ESR.

8.3 ESR has pledged to decarbonise our operations based on the Group's NZC strategy to meet our decarbonisation targets, which is aligned with Paris Agreement's goal on limiting global temperature rise to 1.5°C, compared to pre-industrial levels. ESR is focused in actively participating in the GRESB real estate benchmark, and measure our ESG performance against its peers.

8.4 As part of ESR Group's integrated ESG 2030 Roadmap and NZC commitment, all business units are required to report their annual ESG performance to Group ESG to facilitate group level reporting requirements.

9. IMPLEMENTATION AND MONITORING

9.1 We have established internal processes to implement this ESG Policy across our three core business areas of investment, fund management, and development. These processes include feasibility studies, transaction due diligence, measuring, monitoring, and reporting on ESG Performance Indicators to assess the progress of our ESG commitments.

9.2 We will encourage and train our internal stakeholders to adopt and implement this ESG Policy, including the related Appendices. As part of this implementation, the Group will establish a system to identify training needs, provide training, evaluate the effectiveness of such training, and maintain appropriate training records. Business units are responsible for identifying and reviewing

training needs of their employees so as to meet current and future business requirements.

- 9.3 We have established an ESG Committee that oversees our progress toward achieving our ESG vision and strategy and ensures that we meet our commitments and adhere to corporate policies and practices. We aim to continuously improve and manage our properties and investments in a manner consistent with this ESG Policy.

