

Immobiliare Grande Distribuzione
Società di Investimento immobiliare Quotata
S.p.A. (IGD SIIQ S.p.A.)

RESPONSIBLE TENANCY POLICY

Effective 1/10/2024

Introduction – The Sustainability Strategy

In 2006 IGD adopted the Organizational, Management and Control model in order to build a structured and organic system of rules, procedures, tools and monitoring activities focused on ensuring honesty and transparency in business transactions and company activities for all stakeholders and, at the same time, preventing the commission of the different crimes covered under Legislative Decree 231/2001. The Company has amended this Model over time to comply with regulatory changes (the most recent amendment was approved during the BoD's meeting held on 1/8/2024 and can be found on the company's website at <https://www.gruppoigd.it/en/governance/business-ethics/organizational-model/>).

IGD also embarked on its own sustainability path in 2011 starting from the awareness that adopting social and environmental responsibility criteria in the real estate sector is the way to achieve healthy and long term growth, far from speculative logics.

As of 2013 the integration of E.S.G. (Environmental, Social, Governance) factors in strategic planning, shared with the stakeholders (both internal and external), has gradually increased.

In 2017 the "Becoming G.R.E.A.T." strategy was defined, testifying to the goal of achieving sustainable growth which takes into account environmental issues (Green), people (Responsible), ethics (Ethical), in attractive places (Attractive), together with our stakeholders (Together). The definition of this sustainability strategy is based on the identification and continuous updating of the material issues which inform how the company defines its sustainability risks and targets¹.

Each year IGD monitors the results achieved and reported in the sustainability report, the content of which is defined based on the relative international standards, as well as those specific to the real estate sector.

As of 2020 IGD joins to the Global Compact, the most relevant worldwide sustainability initiative promoted by the United Nations.

The backdrop and scope of the document

For IGD collaboration with the stakeholders is key to the ability to reach the targets included in its sustainability strategy.

For this reason, promoting a path shared with the tenants (defined also as "retail operators" in this document) is particularly important, beginning with the understanding of the social and environmental contribution each actor inside the shopping center can make.

With a view to social sustainability, IGD and the retail operators work to promote and provide fair working conditions which respect human rights, consistent with the most important international standards (for example, the United Nations' Global Impact). They are committed to guaranteeing a workplace which protects human dignity, in accordance with the highest health and safety standards.

¹ For more information refer to the following pages on the corporate website <https://www.gruppoigd.it/en/sustainability/our-sustainability-strategy/> and <https://www.gruppoigd.it/en/sustainability/our-priorities/>

They also act ethically, striving to eliminate corruption, prevent fraud and monitor conflicts of interest.

In terms of environmental sustainability, moreover, in order to achieve the targets to reduce the building emissions defined within Sustainability Plan, IGD and its tenants are committed to work together to identify the initiatives needed to improve each shopping center's environmental performance, including by encouraging its employees, service providers and other partners to act in accordance with sustainability criteria.

The areas of collaboration identified currently include:

- Appropriate sharing of the data needed to constantly monitor all the information relating to the structure's overall environmental impact;
- finding measures and activities which can help to reduce water consumption that can be carried out together;
- organizing effective ways to reduce the amount of landfill waste, consistent with IGD's targets;
- defining specific activities which focus on reducing energy consumption and the use of eco-friendly materials in the buildings' interiors;
- identifying the most opportune ways to share and highlight the commitment to sustainability amongst staff members and with external stakeholders.

These socio-environmental issues, which fall within the scope of the partnership between IGD and the tenant, are addressed in specific documentation including:

- this Policy, which lists the commitments to increase the overall sustainability of the shopping centers shared by landlord and tenant. This document, found on the company's website, informs all stakeholders of the commitments that IGD and the tenants share;
- specific contractual clauses, included in the documentation signed officially by the parties involved.

This documentation is added to the material produced over the last few years for the same purpose including the "Guide to Environmental Best Practices" shared with all the retail operators, and the Tenant Handbook, which the tenants receive from IGD in reference to fit-outs and management of the shop.

Scope of application



This policy is applicable to all the tenants operating in IGD's freehold and leasehold shopping centers in all the regions in which the Company is present as part of their contractual relationships with IGD. This policy is not applicable to tenants who own the shops found inside IGD's shopping centers.

This document will be published on the company website and may be updated and amended over time. The Company will inform the tenants of the changes made.



Areas of implementation






Respect for people

	United Nations SDGs
<p>Respect for human rights and working conditions</p> <p>IGD and the tenants agree to:</p> <ul style="list-style-type: none"> • avoid any type of discrimination (based on, for example, gender, race, ethnicity, religion, language and political opinions) in employment, guaranteeing fair treatment for all employees; • respect the right to freedom of association, protection of the right to organize and the right to collective bargaining; • not use forced, mandatory, undeclared or illegal labor; • not use child labor; • comply with national laws relating to working hours, minimum wage and stable pay periods, basing these practices on the national and/or company contractual agreements; • abstain from using illegal workers and manage their supply chains with care. • guarantee respect for all workers and prevent any form of harassment and adopt an anonymous whistleblowing system. 	  
<p>Ethical conduct</p> <p>IGD and the tenants agree to:</p> <ul style="list-style-type: none"> • respect all international laws designed to fight corruption. Toward this end, the tenant will acknowledge IGD's commitment to anti-corruption which can be found at https://www.gruppoigd.it/en/governance/business-ethics/anti-corruption/; • disclose any potential or current conflicts of interest which could impact the interactions with Gruppo IGD and its employees; • avoid practices that could compromise competition; • pay taxes regularly and actively prevent any and all activities connected to tax evasion; • take all precautions needed to prevent fraud, including reporting any suspicions to the competent authorities and to IGD; • contribute to the fight against money laundering and the financing of terrorism; 	

<p>Workplace safety</p> <p>IGD and the tenants agree to:</p> <ul style="list-style-type: none"> • create a workplace environment which protects personal dignity and guarantees the health and safety of all employees. This includes a commitment to ensuring that personnel understand the importance of using adequate personal protective and professional equipment; • ensure that personnel receive training in the correct use of the products, tools and machinery provided, while also guaranteeing that these tools and equipment are suitable for the tasks and activities being performed; • maintain the safety and confidentiality of data referring to IGD or its tenants and visitors, in accordance with the GDPR, by using adequate monitoring systems. These data will not be shared with third parties without the express consent of IGD. 	 
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Respect for the environment

<p>Sharing of data</p> <p>With the aim of knowing the environmental performance of the entire structure so as to be able to identify possible areas for improvement and reduce consumption accordingly, IGD and the tenants mutually acknowledge that it is their intention to monitor and share, at least annually, the information in their possession concerning (for example):</p> <ul style="list-style-type: none"> • the consumption of water, electricity, gas and any other energy used • waste production, management and recycling • information needed to obtain/maintain any building certifications <p>The data will be used by both parties in full compliance with Privacy laws and regulations.</p>	
<p>Reduction of water consumption</p> <p>IGD and the tenants are committed to a reasonable and mindful use of drinking water, avoiding any and all possible waste and loss of water.</p> <p>For this reason, they will:</p> <ul style="list-style-type: none"> • train staff adequately so that they act in this way every day; • equip themselves with the devices, systems and equipment deemed necessary to reduce water consumption; 	

<ul style="list-style-type: none"> comply with current laws and municipal regulations relating to water consumption, as well as cooperate with the local police and authorities. 	
<p>Correct recycling</p> <p>IGD and the tenants will promote and comply with the standards and regulations relating to the recycling of waste.</p> <p>More in detail, they agree to:</p> <ul style="list-style-type: none"> ensure that their personnel and providers understand how to comply with applicable regulations relating to waste sorting and disposal; each year disclose how much waste was generated in the prior year (when this data is available). 	
<p>Reduced energy consumption and the use of eco-friendly materials</p> <p>IGD and the tenants will reduce their consumption by leveraging on systems improvements and efficient management methods.</p> <p>They, therefore, will:</p> <ul style="list-style-type: none"> install energy efficient lighting systems; identify tools which guarantee energy efficient heating, cooling and ventilation systems; give priority to the use of low-carbon construction materials (if economically reasonable and technically feasible) when making improvements, completing fit-outs, and/or restyling; guarantee the air quality in their respective indoor spaces in order to protect employees and the general public. 	  
<p>Promote the commitment to sustainability</p> <p>IGD and the tenants understand the importance of promoting sustainability with their respective stakeholders.</p> <p>For this reason, they will:</p> <ul style="list-style-type: none"> share the communication methods deemed opportune to promote the commitment to Green Principles within and with respect to the shopping center; dialogue with all its stakeholders to invite them to orient their behaviour towards good sustainability practices. 	

Implementation and control

- IGD will operate in accordance with this document, to the extent applicable to its business, and work to prevent its employees and partners, as well as third parties working for the Group (refer to the "Responsible Supply chain policy"), from acting in a way which is dishonorable and in violation of the standards included in this Policy.
- IGD asks tenants in freehold or leasehold shopping centers to sign this document when a lease and/or subsequent renewals are signed, in order to confirm that the commitment to social and environmental sustainability is shared.
- If the tenants are unable to comply with the stipulations of the clauses signed, they must inform IGD and define any corrective actions to be taken within a certain period of time. IGD reserves the right to carry out specific audits of the tenants, as deemed opportune.
- According to whistleblowing procedures, tenants may report conduct of IGD that does not comply with this document.