



RESPONSIBLE INVESTMENT POLICY

Adopted by the board of directors 2023-12-18

Adopted by	Board of Directors
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Applies to	Alma Property Partners AB
Document owner	Chief Executive Officer

1. INTRODUCTION

1.1 Purpose & Scope

The Responsible Investment Policy (the “Policy”) describes the framework which governs Alma Property Partner AB’s (“Alma”) approach to responsible investing and integration of sustainability and relevant environmental, social and governance (“ESG”) issues with the investment process. Alma’s responsible investment approach is an essential part of our fiduciary duty to create value for our stakeholders. The Policy is adopted by the Board of Directors (“BoD”) and the Sustainability Committee (“SC”) of Alma. The SC is chaired by the Chief Sustainability Officer (CSO) and includes members of the Executive Management team, namely the CEO and Head of Asset Management. The SC is responsible for ensuring compliance with the Policy. The BoD is responsible for the oversight of climate-related risks and opportunities (please refer to our Risk Management Policy for more information). Alma’s Investment Committee (“IC”) for each respective fund is responsible for investment decisions and implementation of this Policy. This Policy applies to our real estate investment strategies and describes how we approach and evaluate material sustainability aspects in all investment decisions. This Policy is reviewed and updated as required and at least annually.

1.2 Initiatives & Commitments

Alma became a signatory to the UN-sponsored Principles for Responsible Investments (the “PRI”) in 2020 and is committed to the initiative’s six principles (the “Principles”):

- incorporate ESG issues into investment analysis and decision-making processes;
- be active owners and incorporate ESG issues into our ownership policies and practices;
- seek appropriate disclosure on ESG issues by the entities in which we invest;
- promote acceptance and implementation of the Principles within the investment industry;
- work together to enhance our effectiveness in implementing the Principles; and
- report on our activities and progress towards implementing the Principles

Alma has a long-term strategic objective to reduce the greenhouse gas (GHG) emissions impact of our investments. In 2023, Alma publicly committed to the Science-Based Target initiative (“SBTi”) to align our investment strategies with the objectives of the Paris Agreement and carbon reduction.

Other initiatives and frameworks that Alma is a member of include:

- INREV (the European Association for Investors in Non-Listed Real Estate Vehicles)
- GRESB (Global Real Estate Sustainability Benchmark)
- SGBC (Sweden Green Building Council)
- FIGBC (Green Building Council Finland)

Our core values of *Local presence, Alignment, Integrity, Balanced approach, and Creativity* permeates how we work along with the 10 principles of the United Nations Global Compact. To read more about Alma’s approach to responsible business practices, please refer to our Code of Conduct and Supplier Code of Conduct.

2. ALMA'S RESPONSIBLE INVESTMENT APPROACH

Alma's responsible investment approach builds on the PRI, material ESG aspects and Principle Adverse Impacts ("PAIs"), according to the Sustainable Finance Disclosure Regulation ("SFDR"). We strive to assess material ESG aspects from the early screening and due diligence phases of our investment process and we continue focusing on material ESG aspects through an active asset management approach during our ownership. We have a structured approach to assessing and managing sustainability-related risks and opportunities throughout the investment and asset management processes.

2.2 How we work with Principal Adverse Impacts

Alma considers the PAIs of its investment decisions on environmental and social factors. PAIs are monitored on an ongoing basis and are subject to our internally developed framework for data collection and due diligence. If an investment is identified as having a considerable negative impact on at least one PAI indicator, a further analysis is made by the Alma investment team. The Investment Committee considers both financial and ESG aspects when making investment decisions.

The PAIs of our investments are reported annually.

2.3 Our Investment process

I. Investment Process

Alma conducts a thorough due diligence process on all potential investments during the investment process. The due diligence phase identifies important ESG risks and opportunities, including PAIs, that should be considered as part of the investment process. In addition, we assess information about key counterparties by following our Anti-Money Laundering (AML) policy, which includes clear Know Your Customer (KYC), Anti-Corruption & Anti-Terrorist Financing procedures, and compliance with our Supplier Code of Conduct. We comply with regulations in the Nordic markets where we invest: Sweden, Denmark, Finland, and Norway. We do not invest in properties associated with illegal weapons, nuclear weapons and illegal drugs for abuse and we comply with laws against money laundering. For more information on further exclusions, please see *Exclusions & Provisions* in the appendix to this Policy.

Important indicators assessed during the due diligence phase of a potential investment include:

- *Climate risks*
Climate-related financial risks and opportunities are assessed by Alma in accordance with TCFD (Taskforce on Climate-related Financial Disclosures). For example, flooding, severe weather and wildfires are risks that are assessed in terms of short-term and long-term impact. The BoD is responsible for the oversight of climate-related risks and opportunities. Please refer to our Risk Management Policy for more information.
- *Nature*
Soil, biodiversity and habitat risks and opportunities are assessed as part of Alma's due diligence process for new investments.
- *Fossil fuels*
An evaluation is performed based on the real estate asset's potential direct involvement in the extraction, storage, transport, or manufacture of fossil fuels. Please see *Exclusions & Provisions* in the appendix to this Policy for more information.



- *Energy*
The energy consumption, energy classification and renewable energy profile of an asset is evaluated during the due diligence process.
- *Stranding*
For every investment evaluated during the due diligence phase, we conduct a CRREM (Carbon Risk Real Estate Monitor) analysis, when feasible, to forecast the stranding year of a real estate asset and benchmark current stranding against a Science-Based Target.

The material findings are assessed and presented to the IC to enable more informed investment decisions with a balanced approach. External tools for data collection and assessments are used to build the investment thesis, mitigate risk, and adjust key assumptions within the underwriting process.

II. Ownership and monitoring

The asset management process begins when Alma takes ownership of an asset and focuses on responsible ownership and effective management of material ESG aspects. This involves developing an ESG action plan based on material issues identified during the due diligence phase, regular ESG performance monitoring and capacity building to maintain or improve performance.

Important indicators reviewed during our ownership include:

- *Energy consumption & renewable energy*
We are dedicated to reviewing energy consumption and increasing energy efficiency. Alma is committed to increasing the share of renewable energy and procuring environmentally friendly energy from certified providers.
- *Waste management*
We have a long-term ambition to provide efficient waste management facilities and effective waste sorting and recycling.
- *Water consumption*
We monitor water usage of our assets at regular intervals. In the event of significant adverse trends in water consumption, corrective actions may be implemented.
- *Tenant health & well-being*
We are committed to improving tenant health and well-being. We conduct Tenant Engagement Surveys annually to assess our tenant needs and better understand how we can improve tenant health and well-being. Please refer to our Supplier Code of Conduct and Risk Management Policy for more information.
- *Green House Gas emissions*
Alma measures Greenhouse Gas Emissions for scope 1, 2 and 3 according to the Green House Gas Protocol and in line with our commitment to the Science-Based Target initiative.
- *Benchmarks*
Widely accepted industry benchmarks such as GRESB (Global Real Estate Sustainability Benchmark) are used for monitoring investments.

Relevant sustainability information is reported to the investors on a regular basis. Material ESG issues related to our investments will be communicated to investors and other relevant stakeholders.



III. Exit

Our ambition is that the responsible investment of our assets will continue after our ownership. Therefore, as part of our divestment process, Alma shall provide ESG information and documentation, including ESG-related improvements underway and completed during our ownership, to the buyer of the asset(s). For example, this may include an evaluation of the asset's progress on its pathway toward alignment with the Paris Agreement.

3. NON-COMPLIANCE WITH THE POLICY

Non-compliance with or deviations from this Policy shall be addressed by the appropriate responsible party and/or Alma's Board of Directors.



APPENDIX

4. EXCLUSIONS & PROVISIONS

Exclusions and provisions mainly refer to how Alma limits its business relationships in terms of ensuring compliance with applicable laws, regulations and sanctions and our commitment to responsible investment and good governance. Please refer to *Alma’s Responsible Investment Approach* described in this Policy and to our AML policy for more information.

TOPIC	DESCRIPTION	EXCLUSION & PROVISION
CARBON REDUCTION	Alma recognizes the importance of reducing carbon in products, machinery and chemicals used in real estate operations, renovations, maintenance and new construction. Reduction of embodied carbon in construction materials is of material impact.	<p>We measure Green House Gas (GHG) emissions and carbon dioxide equivalents (CO2e) on an annual basis and the emissions efficiency per square meter to monitor and reduce carbon over time, in relation to the Science-Based Target initiative.</p> <p>Alma factors in carbon intensity in each investment decision. Purchase of high-carbon building materials will likely be in scope of exclusions in the future. No companies will be excluded based on embodied carbon now.</p>
ENERGY EFFICIENCY	Alma promotes to increase the share of investments in energy-efficient real estate assets.	We measure energy efficiency and EPC levels, when possible, during the investment and asset management phases. We strive to improve energy efficiency and EPC levels (targeting a level of C or above)
GOVERNANCE & COMPLIANCE	Alma’s approach of Good Governance and compliance with applicable laws, regulations and sanctions should permeate our screening and due diligence of counterparties.	Alma conducts an AML process on investors, buyers, sellers, and asset management partners. Please refer to our AML policy for more information. For material agreements including leases, we rely on our due diligence process and Supplier Code of Conduct. We exclude counterparties that have been cited for severe regulatory non-



		<p>compliance, meaningful economic crimes or known health and safety violations or that lack governance of anti-money laundering, anti-corruption or anti-terrorist financing procedures.</p>
<p>FOSSIL FUELS</p>	<p>Alma engages and potentially excludes companies:</p> <ul style="list-style-type: none"> • directly producing processing, refining, transporting, storing, distributing, or retailing large volumes of petroleum-based products. • with mining, production, transportation, distribution or storage of thermal coal and oil sands. <p>Alma shall promote and preferably procure renewable energy over energy generated from fossil fuels when it is available at a reasonable price.</p>	<p>For new investments, Alma cannot construct new facilities for producing, processing, refining, transporting, storing, distributing, or retailing large volumes of petroleum-based products. Alma recognizes that it may purchase portfolios of properties that include existing facilities for producing, processing, refining, transporting, storing, distributing, or retailing large volumes of petroleum-based products and such transactions are acceptable as long as the rental income from such fossil fuel-related facilities is not greater than 5% of the total rental income of the acquired asset/portfolio. Alma commits to using reasonable best efforts to reduce the environmental impact of existing fossil fuel-related facilities during its ownership.</p> <p>Alma’s properties may not be actively used by tenants directly involved in thermal coal or oil sand mining, production, transportation, distribution, or storage.</p> <p>Companies, except for tenants, with a maximum of 5% of annual group revenues attributable to the transportation, distribution and retailing of petroleum products or thermal coal are not in scope of exclusion.</p>



HUMAN RIGHTS	Cluster munitions are banned under international convention. The development, production, stockpiling, acquisition, retention, use and transfer of cluster munitions and their components are in scope of exclusion.	Alma excludes all companies involved with the research, production, stockpiling, acquisition, retention, or transfer of cluster munitions.
HUMAN RIGHTS	Chemical and biological weapons are banned under several treaties. The development, production, stockpiling, acquisition, retention, use and transfer of chemical and biological weapons , including its delivery systems are in scope of exclusion.	Alma excludes all companies involved with the research, production, stockpiling, acquisition, retention, or transfer of chemical or biological weapons.
HUMAN RIGHTS	Landmines (APMs) are banned under the 1997 Anti-Personnel Landmines Convention. The development, production, stockpiling, acquisition, retention, use and transfer of landmines / APMs , including its delivery systems are in scope of exclusion.	Alma excludes all companies involved with the research, production, stockpiling, acquisition, retention, or transfer of landmines / APMs.
LABOUR RIGHTS	Alma adheres to the ILO Declaration on Fundamental Principles and Rights at Work.	Alma excludes all companies known to be violating the ILO Declaration on Fundamental Principles and Rights at Work.