# \* POLESTAR

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY 2021

As a property developer, and services consultant, Polestar recognizes the vital importance of enlightened social governance and responsible environmental management. Our business, which begins with land purchase and can extend through ongoing property ownership, must reflect the values and needs of the regions and communities where we invest. We always strive to find and incorporate the correct balance of economic, social and environmental challenges and opportunities at each stage of the development ownership cycle.

We adhere to the highest standards of social, employment and environmental practises, striving to make each community in which we operate a better place to live and work. This is both a top-down mandate and an integral part of our culture as we conduct day-to-day business.

We regularly review our policies in light of changing societal, market and legal changes.

# Our DNA the ethical foundation of our business:

- We believe in building relationships for the long term and working with like minded Clients, Partners, Supply chain and Community stakeholders.
- We believe an open, honest and transparent approach.
- We are strong believers in collaboration and we challenge and question optimism bias and complacency.

• We are committed to delivering positive sustainable changes as part of our holistic approach to the development process with - "people, planet and collective prosperity" a key foundation in our DNA.

• We pride ourselves with our reputation of a "safe pair of hands" in project establishment and delivery.

Underpinning these core tenets are strict, written policies that apply to all employees regarding: equal employment opportunity, non-discrimination and anti-harassment, anti-corruption, anti-money laundering, conflicts of interest, political contributions, professional training and development and environmental compliance.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

#### **Environmental Philosophies**

As developers and custodians of buildings, whose lives will span many generations, we seek to construct and manage those buildings to protect and enhance the physical environments in which they exist and into the future.

The core of our environmental policies is to conduct business in accordance with applicable environmental laws and governmental directives and to minimise our environmental footprint whenever and wherever feasible. This entails the protection of existing habitats, as well as controlling pollution and use of resources, while effectively addressing the longer-term impact of transportation to and from each location.

#### Leadership

Polestar strives to be a leader in sustainable development and design. Encouraging our teams and our customers in the pursuit of their individual sustainable goals, but to help educate and actively enhance the criteria for all our developments. Operating our businesses sustainably enhances the quality of life of everyone in these assets and creates lasting value for our investors and communities.

Our mission is to drive all developments (whether refurbishment or new build) to the highest sustainable standards - toward net zero and various third-party sustainability certifications.

Polestar is committed to sharing environmental knowledge with our peers in order to learn from their experiences, while engaging in the UK debate through our membership with UK Green Building Council and other sustainability focused industry groups. We strive to not only create the most sustainable value in real estate today, but to assist with building a blueprint for tomorrow.

#### Sustainable Targets

- Net zero (developer and development management services)
- Partner or client we will work collaboratively to meet/exceed their target objectives for sustainability.
- EPC targets minimum B rating on all redevelopment (retrofit) and minimum A/A+ on new developments across all sectors.
- Minimum target BREEAM rating of Excellent / LEED rating Gold on redevelopment and BREEAM Outstanding on new developments
- Target of one H&W certification WELL/Fitwel

#### Efficiency

Polestar strives to reduce energy and water consumption and decrease waste production through better design, technology and sustainable proptech - to identify trends and share best practises to ensure we minimise the carbon footprint of our assets, and assist our clients toward achieving theirs.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

#### Transparency

Transparency is at the heart of everything we do. Polestar strives to maintain transparency with our stakeholders regarding all aspects of our developments.

#### Innovation

Polestar strives to use data and innovative technological advancements and operating practises to improve asset valuation while further minimising our environmental and carbon footprint across our projects.

#### Health

Our commitment to sustainability ensures that our tenants and employees work in healthy and productive environments. We continue to strive for further uses of developing technology and innovative ways to enhance the workplaces for employees and tenants – with transparency and collaborative partnerships we strive to deliver truly healthy and sustainable designed spaces.

## Tenant Engagement

We are committed to working collaboratively with tenants and customers to maximise the opportunities on environmental issues within our buildings and our communities. We understand that in order to achieve impactful change we need to work hand in hand with end users and occupiers. True resource reductions at a building level, can only be forged through strong and transparent relationships with occupiers.

## Professional Training and Development

Polestar is committed to investing in the growth, development and well-being of our employees. We strive to find the most diverse and talented individuals and nurture their development considerately.

## Equal Employment Opportunity

Equal Employment Opportunity has been, and will continue to be, a fundamental principle of Polestar. Where employment is based on personal experience and/or qualifications without discrimination related to race, color, age, gender, sexual orientation, marital status, military or veteran status, national origin, disability, religion, or any other characteristic protected by law.

This policy of Equal Employment Opportunity applies to all policies and procedures of Polestar related to recruitment, hiring, compensation, benefits, training, promotion, transfer, discipline, termination, and all other terms and conditions of employment.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

### Non-Discrimination and Anti-Harassment Policy

Polestar is committed to a work environment in which all individuals are treated with respect and dignity. Everyone has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, Polestar expects that all relationships among persons in the workplace will be business-like, and free of bias, prejudice and harassment.

#### Anti-Corruption

Polestar has zero tolerance for bribery. The Anti-Corruption Policy establishes controls and procedures which mitigate corruption and bribery-related risks.

#### Anti-Money Laundering

Polestar is committed to preventing money laundering, terrorist financing, any violations of sanctions-related rules and damage to Polestar's reputation.

## **Conflicts of Interest**

Business dealings that appear to create a conflict between the interests of the Company and an employee are unacceptable. The Company recognises the right of employees to engage in activities outside of their employment, which are of a private nature and unrelated to our business. However, the employee must disclose any possible conflicts so that the Company may assess and prevent potential conflicts of interest from arising. If an employee has any question whether an action or proposed course of conduct would create a conflict of interest, he or she should immediately contact to obtain advice on the issue.

#### Community

Polestar is deeply committed to the communities around the UK. Our company and our people are dedicated to giving back to these localities and to the people who live and work within them. Polestar's commitment to provide opportunities that encourage social growth through community involvement is at the core of what we do.