

## Statement on principle adverse impacts of investment decisions on sustainability factors

**Version 1.0**

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**Financial market participant:** FOM Invest GmbH, LEI: 5299006DP7ZAMAABPJ84

### Summary

As an asset management company, FOM Invest GmbH (hereinafter referred to as FOM Invest) takes into account the Principal Adverse Impacts (PAI) of its investment decisions on sustainability factors in the real estate asset class and has set up internal strategies for this purpose. This is the consolidated PAI statement of FOM Invest in real estate investments it manages. In the renewable energies asset class, FOM Invest does not yet take into account the Principal Adverse Impacts of investment decisions on sustainability factors.

This PAI statement refers to the reference period from January 1 to December 31, 2024. It is being issued for the first time.

Sustainability factors in the regulatory sense include environmental, social and employee-related matters, respect for human rights and the fight against corruption and bribery. Adverse impacts on these sustainability factors are measured using indicators (also referred to as PAI indicators). PAIs on the sustainability factors of the Alternative Investment Funds (AIFs) managed by FOM Invest in the real estate asset class are presented below, along with a description of the strategies for determining and weighting them.

Since this statement relates exclusively to the assets managed in the real estate asset class, the asset class-specific mandatory indicators for “fossil fuels” and “energy efficiency” and the asset class-specific elective indicator “biodiversity” were taken into account. This PAI statement provides explanations on how these adverse impacts were determined and assessed.

The English-language version of FOM Invest's statement on the main adverse impacts of its investment decisions on sustainability factors can be found on our German-language website.

Description of the main adverse impacts on sustainability factors					
Indicators for investments in real estate					
Sustainability indicator for adverse impacts		Measured variable	Effects 2024	Explanation	Measures taken and planned and targets for the next reference period
	CLIMATE INDICATORS AND OTHER ENVIRONMENTAL INDICATORS				
Fossil fuels	17. exposure to fossil fuels through investment in real estate	Share of investments in real estate related to the extraction, storage, transportation or production of fossil fuels	0,0 %	For the "Fossil fuels" indicator, 100% of the investments made by FOM Invest in real estate were applicable.  To determine the proportion of investments in real estate related to the extraction, storage, transportation or production of fossil fuels, data coverage was 100%.	FOM Invest generally does not invest in real estate that is used for the extraction, storage, transportation or production of fossil fuels. Investments in real estate that serve another main purpose and that also serve the extraction, storage, transportation or production of fossil fuels to a lesser extent may be permitted in individual cases.
Energy efficiency	18. exposure to real estate with poor energy efficiency	Proportion of investments in properties with	100,0 %	In the context of the "energy efficiency" indicator, the terms "nearly zero-energy building" (NZEB), "primary energy	FOM Invest also invests in less energy-efficient properties. FOM Invest examines whether these

		poor energy efficiency		<p>demand" (PED) and "energy performance certificate" (EPC) are used in their meaning as defined in Article 2(2), (5) and (12) of Directive 2010/31/EU of the European Parliament and of the Council.</p> <p>The indicator is applicable to all properties that are subject to EPC and NZEB regulations or for which an energy performance certificate has been issued voluntarily.</p> <p>To determine the proportion of investments in properties with poor energy efficiency, data coverage was 100.0%.</p> <p>A property has poor energy efficiency if it has an EPC rating ( energy performance certificate) of C or worse.</p> <p>Energy performance certificates without a letter classification (this applies to non-residential buildings in Germany) were converted into a letter classification based on the energy information contained in the energy performance</p>	<p>properties can be significantly improved in terms of their energy efficiency in the short to medium term through suitable measures. In this context, FOM Invest has implemented procedures to record and evaluate the effects in the acquisition and investment process and as part of ongoing management. FOM Invest therefore regularly monitors the energy efficiency of the properties it manages and, where necessary or possible, actively works towards improvement.</p> <p>By making additional investments in properties with better energy efficiency, FOM Invest aims to improve the impact for the next reference period compared to the current reference period</p>
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				<p>certificate using a best effort approach generally used in the fund industry. This approach follows the procedure in German energy performance certificates for residential buildings, in which the efficiency class classification in the color scales is based on the final energy demand or consumption. The classification into efficiency classes for non-residential buildings is therefore based on the primary energy demand (for energy demand certificates) or on the final energy consumption shown in the energy certificate (for energy consumption certificates) in the same way as for residential buildings. The classification is made on a percentage basis in accordance with the efficiency class limits for residential buildings specified in Annex 10 of the Building Energy Act (GEG) and on the basis of the maximum values for primary energy demand or final energy consumption shown on the</p>	
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				<p>energy performance certificate. A building is classified as energy efficient if its primary energy demand or final energy consumption is within the first 30% of the specified maximum values.</p>	
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Further indicators for the main adverse impacts on sustainability factors					
ADDITIONAL CLIMATE INDICATORS AND OTHER ENVIRONMENTAL INDICATORS					CLIMATE
Sustainability indicator for adverse impacts		Measured variable	Effects 2024	Explanations	Measures taken and planned and targets for the next reference period
Biodiversity	22. shoring	Proportion of non-vegetated area (non-vegetated areas on the ground and on roofs, terraces and walls) compared to the total area of all systems	92,6%	<p>For the "biodiversity" indicator, 100% of the investments made by FOM Invest in real estate were applicable.</p> <p>Data coverage of 100.0% was used to determine the proportion of non-vegetated areas. The data basis consisted of both actual values (square meters as entered in the land register) and estimated values (area calculations using satellite images of the properties).</p>	<p>FOM Invest integrates biodiversity strategies in order to increase the attractiveness of the location.</p> <p>An analysis of the existing situation forms the basis for the (further) development of a property-related greening concept. The greening concepts provide for the greening of roof surfaces, facades and floors. The greening concepts are developed at individual property level, taking into account limiting factors (e.g. building statics, building law restrictions, geographical location,</p>

					<p>budget). These measures help to improve the microclimate, reduce energy consumption and create habitats for animals and plants. They also contribute to increasing the value of the property in question.</p> <p>The property-related greening concepts are regularly reviewed and further developed.</p>
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The values in the "Impact 2024" column represent an average value of the impact on March 31, June 30, September 30 and December 31.

### **Description of the strategies for identifying and weighting the main adverse impacts on sustainability factors**

Sustainability factors in the regulatory sense include environmental, social and employee concerns, respect for human rights and the fight against corruption and bribery. Adverse impacts on these sustainability factors - also referred to as Principal Adverse Impact ("PAI") - are measured using so-called indicators (also known as PAI indicators).

In addition to the two mandatory indicators "Fossil fuels", which measures the exposure to fossil fuels through investments in real estate, and "Energy efficiency", which measures the exposure to real estate with poor energy efficiency, FOM Invest has selected the optional indicator "Biodiversity" with regard to construction. The indicator of choice is defined as the "proportion of non-greened areas (non-greened floor, roof, terrace and wall areas) in the total area of the facility". The selection indicator was chosen by FOM Invest against the background of relevance for environmental aspects and optimization potential:

- The areas of the portfolio properties in the investment funds have a high degree of sealing, e.g. due to parking lots. This results in potential for reducing the proportion of sealed surfaces.
- Due to the high proportion of flat roofs in the existing properties, there is the possibility of green roofs, which already exist in some properties.
- The indicator can be measured reliably.

- Improvements to this indicator, such as the reduction of sealed surfaces and the expansion of green areas, have a high impact on biodiversity.

Biodiversity plays a central role, as investment decisions in the real estate sector can have a significant impact on biodiversity, ecosystems and the urban climate. Its increasing importance is also underlined by global sustainability assessments, which emphasize the integration of biodiversity aspects as a decisive factor for sustainable and future-proof investments. By integrating biodiversity strategies, FOM Invest therefore intends to benefit in the long term from a more attractive location, lower operating costs and better adaptation to regulatory requirements

The "fossil fuels", "energy efficiency" and "biodiversity" indicators currently relevant to FOM Invest are assessed and determined using available data sources, including in particular property-specific information from, for example, notarized purchase agreements or energy requirement or consumption certificates. Data points that are currently not (exactly) available are supplemented by estimates or extrapolations. This may result in inaccuracies and deviations from the actual values. The proportion of estimated or extrapolated data only relates to the "energy efficiency" (with regard to the classification of efficiency classes for non-residential buildings using a best-effort approach analogous to the energy performance certificate for residential buildings) and "biodiversity" (with regard to the estimation of area dimensions using satellite images of the properties) indicators. In line with the principle of proportionality, FOM Invest will always endeavor to obtain missing data or improve the methods for estimation or extrapolation where possible in order to be able to report even more precise values in future.

The management of FOM Invest is responsible for setting up strategies to incorporate adverse impacts on sustainability factors. The respective FOM Invest portfolio management team is responsible for implementing investment strategies in the area of real estate. If necessary, support is provided by FOM Invest's ESG Officer, who is organizationally assigned to the "Risk Management, Information Security & ESG" department. The strategy for determining and weighting the strategies for incorporating adverse impacts on sustainability factors was approved by the Management Board of FOM Invest on March 17, 2025. The strategy is reviewed at least once a year.

### **Participation policy**

As part of its business model, FOM Invest does not invest in stock corporations whose shares are admitted to trading on a regulated market in the European Union. The obligation to present the participation policy in accordance with Article 3g of Directive 2007/36/EC (the "Shareholders' Rights Directive") is therefore not relevant for FOM Invest.

### **Reference to internationally recognized standards**

Although FOM Invest has not formally recognized any voluntary sustainability standards at present, it derives its actions in terms of sustainable property management and project planning from various international and national standards and initiatives.

### **Historical comparison**

A historical comparison can only be presented from the second reporting year onwards.



