FOM INVEST
BRAWOGROUP

Statement on principal adverse impacts of investment decisions on sustainability factors

Version 1.0

As at 30 June 2026

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

Summary

FOM Invest GmbH (hereinafter FOM Invest), as an alternative investment fund manager in the real estate asset class, considers the principal adverse impacts of its investment decisions on sustainability factors and has established internal strategies for this purpose. This Statement is the consolidated statement of the principal adverse impacts on the sustainability factors of FOM Invest in connection with real estate investments in the alternative investment funds ("AIFs") managed by it. In the renewable energy asset class, FOM Invest currently does not yet consider the principal adverse impacts of investment decisions on sustainability factors.

This Statement on principal adverse impacts on sustainability factors relates to the reference period from January 1st to December 31st, 2025. It is being published for the second time.

For regulatory purposes, sustainability factors comprise environmental, social and employee matters, respect for human rights, and the fight against corruption and bribery. Adverse impacts on these sustainability factors – also referred to as Principal Adverse Impacts ("PAI") – are measured using indicators (also referred to as PAI indicators). The following sets out the principal adverse impacts of investment decisions on sustainability factors of the AIFs managed by FOM Invest in the real estate asset class, as well as describing the strategies for identifying and weighting these impacts.

As this Statement relates exclusively to investment funds managed in the real estate asset class, the asset-class-specific mandatory indicators relating to "fossil fuels" and "energy efficiency", as well as the asset-class-specific additional indicator "biodiversity", have been taken into account. For these indicators, this Statement reports on the adverse impacts on sustainability factors during the reference period and provides explanations of the determination and assessment of these adverse impacts.

FOM Invest is currently neither a signatory to nor a member of an international sustainability initiative. A forward-looking climate scenario is currently not used at company level.

Description of principal adverse impacts on sustainability factors						
		Indicators for investments in real estate				
Sustainability indicator for adverse impacts		**Measured variable**	**Effects 2024**	**Effects 2025**	**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 %	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 poor energy efficiency	100,0 %	75,0 %	In the context of the "energy efficiency" indicator, the terms "nearly zero-energy building" (NZEB), "primary energy demand" (PED) and "energy performance certificate" (EPC) are used in their meaning as defined in	FOM Invest also makes investments in properties that are less energy-efficient. FOM Invest assesses whether the energy efficiency of these properties can be significantly improved in the short to medium term through

					Article 2(2), (5) and (12) of Directive 2010/31/EU of the European Parliament and of the Council. 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. To determine the proportion of investments in properties with poor energy efficiency, data coverage was 100.0%. A property has poor energy efficiency if it has an EPC rating (energy performance certificate) of C or worse. 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 certificate using a best effort	appropriate measures. In this context, FOM Invest has implemented procedures for tracking and evaluating the impacts during the acquisition and investment process, as well as in the course of ongoing property management. FOM Invest therefore regularly monitors the energy efficiency of the properties it manages and, where necessary or possible, actively works to improve them. During the past reporting period, FOM Invest acquired properties with both higher and lower energy efficiency than the portfolio average. Through further investments in properties with better energy efficiency, FOM Invest was able to achieve an improvement in environmental impact during the 2025 reporting period compared to the previous reporting period.

					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 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.	

		Further indicators for the main adverse impacts on sustainability factors				
		ADDITIONAL CLIMATE INDICATORS AND OTHER ENVIRONMENTAL INDICATORS				
Sustainability indicator for adverse impacts		**Measured variable**	**Effects 2024**	**Effects 2025**	**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%	90,99%	For the "biodiversity" indicator, 100% of the investments made by FOM Invest in real estate were applicable. 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).	FOM Invest integrates biodiversity strategies to enhance a site's attractiveness. A site analysis forms the basis for the (further) development of a property-specific greening concept. The greening concepts call for the greening of roof surfaces, facades, and ground areas. The greening concepts are developed at the individual property level, taking into account limiting factors (such as the building's structural integrity, building code restrictions, geographic location, and budget). These measures help improve the microclimate, reduce energy

						consumption, and create habitats for animals and plants. Furthermore, they contribute to increasing the value of the respective property. The property-specific greening concepts are regularly reviewed and refined. By investing in properties with a lower proportion of non-greened areas, FOM Invest was able to achieve an improvement in environmental impact during the 2025 reporting period compared to the previous reporting period.

The values in the “Impact 2025” column represent the average impact as of March 31, June 30, September 30, and December 31.

Description of the strategies for identifying and weighting principal adverse impacts on sustainability factors

For regulatory purposes, sustainability factors comprise environmental, social and employee matters, respect for human rights, and the fight against corruption and bribery. Adverse impacts on these sustainability factors – also referred to as Principal Adverse Impacts (“PAI”) – are measured using indicators (also referred to as PAI indicators).

In addition to the two mandatory indicators “Fossil fuels”, measured by exposure to fossil fuels through investment in real estate, and “Energy efficiency”, measured by exposure to real estate with poor energy efficiency, FOM Invest has selected the additional indicator “Biodiversity” with regard to land degradation. The three PAI indicators are each weighted equally, at one third. The metric of the additional indicator is defined as “share of unartificialised areas (unartificialised ground, roof, terrace and wall areas) of the total area of the property”. FOM Invest selected the additional indicator due to its relevance to environmental aspects and its potential with respect to optimisation:

- The areas of the existing properties in the investment funds have a high degree of soil sealing, e.g. due to parking areas. This creates potential to reduce the share of sealed areas.
- Due to the high proportion of flat roofs among the existing properties, there is potential for green roofs, some of which are already in place at certain properties.
- The indicator can be measured reliably.
- Improvements to this indicator, such as reducing sealed areas and expanding greening, have a significant impact on biodiversity.

The topic of "Biodiversity" plays a central role, as investment decisions in the real estate sector can have significant impacts on biodiversity, ecosystems and the urban climate. Its growing importance is also underscored by global sustainability assessments, which highlight the integration of biodiversity aspects as a key factor for sustainable and future-proof investments. By integrating biodiversity strategies, FOM Invest therefore intends to benefit in the long term from greater location attractiveness, lower operating costs and better adaptation to regulatory requirements.

The assessment and determination of the indicators currently relevant to FOM Invest, "Fossil fuels", "Energy efficiency" and "Biodiversity", is carried out using available data sources, including in particular property-specific information from, for example, notarised purchase agreements or energy performance certificates based on calculated demand or measured consumption. 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 share of estimated or extrapolated data relates only to the indicators "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 estimating area measurements using satellite imagery of the properties). FOM Invest will, in accordance with the principle of proportionality, always endeavour to obtain missing data and, where possible, improve the methods for estimation or extrapolation in order to be able to report even more precise values in the future.

The Management Board of FOM Invest is responsible for establishing company-wide strategies for incorporating adverse impacts on sustainability factors. The respective portfolio management team of FOM Invest is responsible for implementing investment strategies in the real estate sector. Where required, the ESG Officer of FOM Invest, who is organisationally assigned to the "Risk Management, Information Security & ESG" department, provides support. The approach to identifying and weighting the strategies for incorporating adverse impacts on sustainability factors is reviewed at least annually.

Participation policy

As part of its business model, FOM Invest does not invest in public limited companies whose shares are admitted to trading on a regulated market in the European Union. The obligation to describe the engagement policy pursuant to Article 3g of Directive 2007/36/EC (the so-called "Shareholders' Rights Directive") therefore does not apply to FOM Invest.

Reference to internationally recognised standards FOM Invest is currently neither a signatory to nor a member of the UN Global Compact, the Principles for Responsible Investment (PRI), a Net-Zero Initiative or a comparable international sustainability initiative. No formal recognition, certification or external validation by these initiatives exists. FOM Invest considers selected content of internationally recognised frameworks – in particular principles of responsible corporate governance, human rights and environmental due diligence, as well as relevant industry guidelines – as non-binding reference points for internal governance, compliance, due diligence and risk management processes. This does not constitute membership of, signature of, a statement of support for, or recognition by the respective initiatives. The frameworks mentioned are not directly related to the PAI indicators for real estate used in this Statement concerning exposure to fossil fuels, exposure to real estate with poor energy efficiency, or biodiversity in relation to land degradation. Compliance with these frameworks is therefore not measured using individual PAI indicators; methods or data for quantitative alignment with these frameworks cannot be disclosed in this respect. At company level, FOM Invest currently does not use a forward-looking climate scenario to measure alignment with international standards. Transition climate risks and possible impacts on the objectives of the Paris Agreement are taken into account, where applicable and where data are available, as part of the acquisition process and ongoing asset management.
Historical comparison In the historical comparison, only the first and second reporting years can be considered. There were changes in the PAI indicators “Energy Efficiency” and “Biodiversity,” which are explained in the table above. Both changes represent an improvement.