



ENVIRONMENTAL POLICIES AND PROCEDURES

SHOPLAND NYÍREGYHÁZA

v1.2

2025

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SCOPE

This policy provides guidelines for minimizing energy, water, and waste usage at Shopland Nyíregyháza (Pazonyi út 36, 4400 Nyíregyháza, Hungary), for protecting the indoor air quality as well as the outdoor habitat, while also supporting high-performance building operations and developing synergies between the building and its environmental context. It applies to all operations and maintenance activities at the site, including those managed by tenants or contractors, to ensure environmental impacts are minimized.

GOALS

The primary goals of this policy are to minimize the impact of site management practices on the local ecosystem and to reduce the exposure of occupants, staff, and maintenance personnel to potentially hazardous chemical, biological, and particulate contaminants. Furthermore, the policy addresses climate risk and resilience-related issues for the asset, aligning the property's management with broader sustainability and decarbonization targets. By implementing this policy, Shopland Nyíregyháza aims to operate as an environmentally responsible retail park, integrating sustainable practices into energy use, water use, waste management, cleaning, pest control, and indoor air quality management.

RESPONSIBLE PARTY

The Property Manager (Eston International Kft.) is responsible for implementing the Environmental Management Policy, which is developed by the Landlord (Adventum Zrt.). Contractors involved in various elements of the policy shall carry out their tasks according to their contracts and report all relevant activities to the parties. When multiple contractors or service providers are engaged simultaneously, the building staff responsible for overseeing the policy will ensure an effective and coordinated effort by reviewing all proposed activities before implementation.

Position	Company (Role)
Landlord	Adventum International
Property Manager	Eston International Kft.
Facility Manager	Dome Facility Services Group Kft.
Cleaning Manager	Master Clean

(Note: Contact details for the above responsible parties are maintained separately. All personal contact information is subject to data protection and privacy requirements.)

ENERGY USE

4.1 Energy Use Improvement Targets

Energy consumption is a significant concern for Shopland Nyíregyháza management. The asset has procedures in place to measure, track, and implement cost-effective strategies with the ultimate purpose of reducing energy consumption. Efficient and appropriate use of energy has a substantial impact on the environment in terms of conserving fossil fuels and reducing pollutant air emissions. Considering baseline monthly energy consumption, the building management team has set the following realistic energy improvement target for the asset:

- **Reduction by 20% of electricity consumption by the end of 2028** (compared to the baseline year 2023).

This target will be pursued through both technological upgrades and operational best practices, as outlined below.

4.2 Best environmental management provisions for energy use

4.2.1 Lighting Energy

Shopland Nyíregyháza has completed a full retrofit of the building's interior and exterior lighting systems with high-efficiency LED fixtures. This retrofit covers all tenant and common areas, including corridors, service zones, and outdoor spaces such as parking lots, pathways, and façades. The LED lighting installation significantly reduces overall power consumption while providing reliable and consistent illumination quality throughout the site.

Key provisions in support of energy-efficient lighting include:

- **Fully Retrofitted LED System:** All luminaires within the building and its external areas have been replaced with energy-efficient LED fittings. These lights offer reduced power draw, longer operational life, and lower maintenance requirements compared to traditional incandescent or fluorescent fixtures.
- **Exterior Lighting Optimization:** Outdoor lighting is equipped with appropriate shielding and covers to minimize light pollution and ensure downward-directed illumination only. This supports both energy efficiency and compliance with dark-sky principles.
- **Control Systems:** All common-area lighting circuits are controlled via timers or daylight sensors to prevent unnecessary operation during daylight hours or when spaces are unoccupied.
- **Tenant Fit-out Recommendations:** While the base building is already optimized, tenants undertaking refurbishment or new fit-outs are encouraged to preserve or upgrade to high-efficiency LED solutions in their leased units.
- **Operational Awareness:** Property management continues to monitor and adjust lighting schedules seasonally to optimize runtime and energy usage. Staff are instructed to report any lighting malfunctions to ensure timely repair or replacement.

4.2.2 HVAC Controls

To ensure efficient use of the heating, ventilation, and air conditioning (HVAC) systems, the maintenance contractor (under the guidance of the property manager) monitors the building's energy

consumption monthly and proposes, at the end of each semester, a list of measures for improvement. The management of Shopland Nyíregyháza shall receive regular reports and implement the following measures for HVAC energy efficiency:

- **Preventive Maintenance:** A scheduled preventive maintenance plan for all HVAC equipment is in place to ensure systems operate at peak efficiency. This includes seasonal tune-ups and cleaning of HVAC components.
- **Filter Replacement Logs:** HVAC filters are replaced on a regular schedule (at least once per semester) and logged, to maintain airflow efficiency and indoor air quality. Clogged filters can cause HVAC units to work harder and use more energy, so tracking replacements helps optimize energy use.
- **Energy Use Monitoring:** Monthly energy consumption for HVAC is recorded and reviewed. Reports of HVAC energy use are generated, highlighting any peaks in energy consumption and investigating the reasons for increases. This monitoring allows for early detection of anomalies (e.g., equipment faults or control issues) that could be wasting energy.
- **Bi-annual Efficiency Review:** On a bi-annual basis, the HVAC maintenance team proposes improvement methods or upgrades to enhance efficiency. These might include recalibrating controls, balancing airflows, or recommending equipment upgrades if necessary.
- **Temperature Setbacks:** Controls are set to provide appropriate temperature setbacks during unoccupied hours. During night-time or other non-business hours, the interior setpoint temperatures are adjusted to save energy (lower heating setpoint in winter, higher cooling setpoint in summer). With the BMS programmed setback temperatures of about 18°C in winter and 27°C in summer during off-hours. Occupied hours are maintained at comfortable standards (around 20°C in winter and 25°C in summer).
- **Automatic Controls:** An automation strategy is implemented for HVAC systems. Ventilation fans' circuits are scheduled to shut down during the night when the building is unoccupied.
- **Continuous Optimization:** The HVAC control system is reviewed periodically to ensure settings (like thermostat setpoints, timer programs, and zoning controls) are optimized for both energy savings and occupant comfort. Any new technology or control upgrades (such as advanced building management system algorithms or variable speed drives on motors) that could yield energy savings are considered as part of the ongoing improvement process.

By implementing the above measures, the building aims to maintain a comfortable indoor environment for shoppers and staff while significantly reducing the energy consumed by the HVAC and lighting systems.

WATER USE

5.1 Water Use Improvement Targets

Water is essential to all life and is important to nearly every business activity. However, increasing demand and climate factors are causing water scarcity in many regions. Therefore, water conservation at Shopland Nyíregyháza is not only about environmental responsibility but also about cost management. The facility management is committed to efficient water use through both operational

practices and infrastructure. The Property Manager provides guidance on water conservation issues at the site, but every staff member and tenant also has a responsibility to carry out work activities in accordance with best practices for water efficiency. Beyond the listed best practices, staff and contractors are encouraged to apply practical know-how to reduce water consumption in their daily tasks.

The following water use improvement target has been set for the asset:

- **Reduction by 10% of total water consumption by the end of 2028** (relative to the baseline usage of 2023).

To achieve this target, the management will implement water-saving measures, monitor usage closely, and promote awareness among tenants and maintenance personnel.

Best environmental management provisions for water conservation: Water use management at Shopland Nyíregyháza includes common-sense practices to minimize wastage, encourage recycling/reuse where feasible, and ensure proper maintenance of water infrastructure. The following measures are in place:

- **Water-Saving Fixtures:** The entire site is already equipped with water-efficient fixtures and systems. All taps are fitted with aerators and/or auto-sensor controls to minimize flow rates. Toilets throughout the asset use dual-flush mechanisms that allow users to select between low-volume (4.5 litres) and standard-volume (6 litres) flushes, depending on need. In men's restrooms, urinals are equipped with infrared sensors to ensure water is only used after actual use. Outdoor green areas, including landscaped zones, are irrigated via a programmable, time-controlled irrigation system that optimizes watering schedules and prevents overuse.
- **Leak Detection and Repair:** Regularly check the building for leaks or water waste. All plumbing (pipes, fixtures, valves) is inspected routinely, and any leaks or dripping faucets are promptly repaired. Maintenance staff are trained to look for signs of leaks (e.g. damp spots, unexpected meter spikes) during daily rounds. Continuous monitoring of water consumption is employed via automatic metering systems, which track usage in real time and help identify areas or times with unusually high consumption.
- **Good Housekeeping Practices:** Employ cleaning methods that reduce unnecessary water use. For example, sweep or dry mop floors when possible instead of washing with water if a dry clean is sufficient. Only water landscape plants when needed (e.g., based on weather or soil moisture) to avoid overwatering. Staff are instructed to turn off taps immediately after use and not to leave water running when it is not needed (for instance, when washing cleaning tools or during maintenance tasks).
- **Water Quality:** Regular water sample testing is conducted (as applicable, e.g., for potable water quality or legionella in building water systems) to ensure the water is safe and to promptly address any issues.
- **Awareness and Signage:** Appropriate signage is placed in restrooms and kitchens to remind users that water is a precious resource and to encourage conservation (e.g., signs near sinks urging users to turn off the tap, or notices about the dual-flush toilet operation). Tenants and

staff are periodically informed about water-saving tips and the building's water conservation goals, fostering a culture of conscientious water use.

Monitoring and Reporting: Water consumption data is continuously tracked and compared against the set targets. The results of water usage monitoring are reported to property Management via regular reports, and key information is also made available to building occupants. Each tenant's representative is asked to review and acknowledge their sub-meter readings monthly (signing meter reading sheets at the end of data collection) to involve them in tracking their consumption. All meter readings are recorded in a centralized log, where monthly data is compared to previous months and the same period in the previous year, helping identify trends or areas for improvement.

Capital Expenditure Considerations: When planning any major refurbishments or equipment replacements, the management includes water efficiency in the decision criteria. This means selecting water-efficient fixtures and appliances (e.g., low-flow taps and showerheads, efficient dishwashers if any, etc.) and potentially investing in systems like rainwater harvesting or greywater reuse if feasible in the future. By considering water efficiency in capital projects, the asset ensures long-term reductions in water usage are sustained.

- Toilets: ≤ 4.5 litres/flush
- Urinals: ≤ 1.2 litres/flush
- Hand washing taps: ≤ 4 litres/min
- Showerheads: ≤ 6 litres/min

Responsible Parties: The Property Manager (Eston International) along with the Facility Manager is responsible for overseeing the implementation of the above water conservation measures and ensuring that staff and contractors adhere to them. They will also handle the analysis of water consumption data and coordination with tenants regarding any water-related issues or initiatives. All building staff and occupants are expected to cooperate and contribute to the success of the water conservation strategy.

CLEANING

At Shopland Nyíregyháza, cleaning of all public and common areas – such as corridors, restrooms, stairwells, entrances, and other high-traffic areas – is performed daily by the contracted cleaning team during business hours. In addition to routine daily cleaning, specific areas (e.g., entry mats, carpets, and flooring in main lobbies and food court areas, etc.) are **deep cleaned** on a scheduled basis to ensure high levels of hygiene and appearance. Deep cleaning may be done after hours or during low-traffic periods to minimize inconvenience to occupants.

All cleaning equipment and materials used at the site are chosen to minimize their impact on indoor air quality and the environment as prescribed by the procurement policy. For example, the cleaning staff use HEPA-filter vacuum cleaners (which capture fine dust and allergens and prevent them from recirculating in the air) and lint-free microfiber cloths and dusters (which clean effectively without generating excess dust). These practices ensure that cleaning activities do not inadvertently degrade the indoor air quality.

Cleaning products and consumables are also selected with environmental and health considerations in mind. Whenever possible, the products (e.g., floor cleaners, carpet shampoos, general-purpose

cleaners, disinfectants, etc.) meet recognized green standards such as Green Seal, EcoLogo (Environmental Choice), the EU Ecolabel, or the German Blue Angel program. This means they are formulated to be low in volatile organic compounds (VOCs), non-toxic, biodegradable, and effective in lower concentrations, thereby reducing the chemical burden indoors. Product types subject to these green purchasing requirements include but are not limited to: bio-enzymatic cleaners, hard-floor and carpet cleaners, general-purpose and specialty cleaners, odor control products, disinfectants, as well as disposable janitorial paper products, trash bags, and hand soaps. By using these certified products, the facility reduces harmful chemical exposure for both cleaning personnel and occupants and reduces the release of hazardous substances into the environment.

The cleaning contractor is responsible for training its personnel in proper cleaning methods, the use of equipment, and the handling of materials in accordance with this policy. Training records are kept ensuring all cleaning staff are knowledgeable about the best practices (such as correct dilution of concentrates, safe use of machinery, and emergency procedures for spills). Emphasis is placed on methods that maximize cleaning efficacy while minimizing water use and chemical use – for instance, using microfiber mops that require less water or choosing mechanical cleaning techniques (like steam cleaning) where appropriate to reduce chemical dependency.

Each small tenant is responsible for cleaning the interior of their own leased premises (their store or unit). However, they are informed about the asset's cleaning and green housekeeping best practices as detailed above. The Property Manager communicates these to tenants, through the tenant handbook, encouraging them to also use eco-friendly cleaning products and practices. This unified approach helps that even tenant-controlled cleaning does not counteract the environmental efforts of the common areas.

By maintaining high cleaning standards and using sustainable cleaning practices, Shopland Nyíregyháza provides a healthy and welcoming environment for visitors and staff, while also reducing the environmental footprint of janitorial operations.

PEST CONTROL

Pest management at Shopland Nyíregyháza follows the principles of **Integrated Pest Management (IPM)** to ensure minimal environmental impact, protection of biodiversity, and alignment with BREEAM expectations. The approach focuses on prevention, monitoring, and least-toxic intervention, and it aligns with the ecological and biodiversity-focused practices recommended in the site-wide management frameworks.

6.1 Integrated Pest Management Practices

In line with the Shopland Biodiversity Management Plan (2025) developed by certified ecological expert, the following pest control framework has been adopted for implementation at Shopland Nyíregyháza:

I. Preventive Measures

- **Enclosed and Secure Waste Storage:** All waste and recycling bins have tight-fitting lids and are stored in secure, rodent-proof areas. Waste storage areas are cleaned and disinfected daily.
- **Daily Waste Collection:** General and organic waste, especially from food-serving tenants, is collected at least once daily to avoid pest attraction.

- **Building Sealing and Physical Barriers:** All structural gaps, cracks, and utility penetrations are sealed to eliminate pest entry routes. Ventilation and drainage inlets are fitted with fine wire mesh.
- **Hygiene and Housekeeping:** Common areas (e.g. loading docks, corridors, food courts) are cleaned daily. Spills and food waste are removed immediately to eliminate food sources for pests.

II. Monitoring and Inspection

- **Routine Site Inspections:** Biweekly pest monitoring is conducted across all key risk areas, including waste zones and tenant back-of-house areas.
- **Use of Traps and Monitoring Tools:** Non-chemical rodent traps and tracking devices are used, and inspection findings are recorded in a logbook or software system.
- **Tenant Training and Awareness:** Regular training sessions are conducted for tenants and food service operators to reinforce hygiene and pest prevention measures.

III. Eco-Friendly Intervention (As Needed)

- **Insect Control (Indoors Only):** If intervention is required, only eco-friendly solutions such as diatomaceous earth, pyrethrin-based sprays, neem oil, or insect gel baits are allowed.
- **Rodent Control:** Preferred methods include live traps, snap traps, or ultrasonic repellents. Chemical rodenticides are used only as a last resort, and only inside tamper-resistant bait stations.
- **No Broad-Scale Spraying or Fumigation:** Broad-spectrum chemical spraying, fogging, or exterior pesticide applications are prohibited, aligning with the site's biodiversity protection goals.

IV. External Pest Control Services

If pest control contractors are engaged:

- They must comply with IPM principles.
- Treatment substances and methods must be transparently documented.
- Preference is given to non-chemical or reduced-chemical methods.

WASTE

8.1 Waste Improvement Targets

Shopland Nyíregyháza is committed to reducing the amount of waste generated on site and diverting as much waste as possible from landfill through reuse and recycling. Each tenant and staff member must understand how to properly store and dispose of wastes generated from their activities, the use of products, and the operation of services on the premises. Properly storing waste (in appropriate containers, with lids, in designated areas) ensures the safety of personnel and minimizes the potential for accidental releases of waste into the environment (for example, wind-blown debris or leaks from waste bins). It also ensures compliance with local regulations regarding waste handling. All waste must be disposed of through authorized waste management contractors or recycling services, as applicable.

Responsible disposal practices ensure that the shopping center operates in an environmentally sound manner and in compliance with legal requirements. Improper disposal of waste can not only harm the environment but also create future financial liabilities for the company (for instance, cleanup costs or

finer). It is noted that liability for environmental contamination can be retroactive; thus, improper disposal practices today might lead to costly consequences in the future. Therefore, if there is any doubt about how to categorize or dispose of a particular waste, the precautionary principle should be applied – i.e., err on the side of caution and treat the waste as hazardous or seek professional disposal methods to ensure environmental protection.

Tenants must employ methods and procedures that minimize the impact of their activities on the environment by disposing of waste responsibly. This includes following the recycling and waste separation rules set by the property (for example, separating recyclables such as paper, plastics, glass, metal, as well as handling any hazardous waste like electronic waste or batteries through proper channels). All occupants (tenants, employees, contractors, and visitors) are responsible for preventing or reducing pollution in the performance of their daily activities. Simple actions like not littering, using the correct bins for recyclables, and reducing unnecessary consumption of disposable items all contribute to this effort.

Improvement target for waste generation at the site:

- **Reduction by 10% of the total waste generated onsite by the end of 2028** (relative to baseline of 2023). This target includes both non-recyclable waste reduction and maximizing recycling rates.

To meet this target, the management will implement and encourage waste minimization and diversion strategies as described below.

Best environmental management provisions to minimize and divert waste: Efficient waste reduction (especially of non-recyclable, landfill-bound waste) can be achieved through ongoing education and provision of alternatives to building users. The management will use announcements, signage, and tenant engagement to promote the following practices:

- **Minimize Disposable Packaging:** Tenants and customers are encouraged to minimize the use of single-use packaging and bags. For example, reduce the use of excessive wrapping, plastic bags, and packaging materials (plastic, cardboard, paper). Reusable shopping bags and packaging should be promoted wherever feasible. If plastic bags are used by retailers, encourage customers to reuse them or return them for recycling.
- **Reduce Soiled Paper Waste:** Avoid using disposable paper products where possible, especially those that cannot be recycled due to contamination. For instance, use washable cleaning cloths or towels instead of disposable wipes for cleaning tasks, and avoid using paper towels excessively (some tenants may consider high-efficiency hand dryers to reduce paper towel waste). Wet or dirty cardboard and paper (e.g., food-soiled) cannot be recycled, so efforts should be made to prevent such waste or find composting options if applicable.
- **Optimize Cleaning and Maintenance Supplies:** Use durable, long-lasting items instead of disposable ones. For example, use vacuum cleaners with reusable dust canisters or long-lasting bags to reduce waste from vacuum bags. Encourage proper cigarette disposal to avoid litter (provide ashtray bins outside entrances to prevent cigarette ends on the ground) and discourage gum litter by providing waste bins – cigarette ends and gum contribute to non-recyclable waste streams.

- **Limit Single-Use Service Items:** At any on-site food service or in tenant break rooms, promote the use of non-disposable dishware and cutlery. Avoid disposable plates, cups, and plastic cutlery for events or daily use; use normal reusable cutlery and dishes instead. If disposables are necessary, choose biodegradable or recyclable options and ensure proper collection for those.
- **Reduce Styrofoam and Hazardous Waste:** Tenants are advised to avoid polystyrene (Styrofoam) packaging for products or food service, as it is not readily recyclable and persists in the environment. Also, manage items like batteries by using rechargeable batteries where possible to decrease the number of single-use batteries disposed. Provide a collection point for used batteries, light bulbs, and small electronics so they can be recycled or disposed of as hazardous waste rather than ending up in general trash. Empty aerosol or spray cans should be handled carefully – if possible, choose pump sprays over aerosols, or ensure aerosol cans are completely empty and disposed of according to local regulations (some areas treat them as hazardous waste).

By reducing the usage of the above materials and encouraging alternatives, the site can significantly cut down the volume of waste requiring disposal. The management will also ensure that adequate recycling facilities are in place on-site: for example, clearly labeled recycling bins for paper, plastic, metal, and glass in common areas and back-of-house areas for tenant use. Regular waste audits may be conducted to track progress towards the waste reduction target and identify further opportunities (such as if a lot of a certain type of waste is found in general trash, targeting that for reduction or recycling).

8.2 Landscape Waste

Shopland Nyíregyháza aims to minimize the quantity of landscape (grounds maintenance) waste generated on the property. Although the site may have limited green space, the landscaping that does exist (lawns, planted beds, trees, etc.) is managed with waste reduction in mind. Grass clippings, leaves, and pruning debris are handled in a way that promotes natural recycling of nutrients and avoids sending organic matter to landfill. The following information is extracted from the Facility Management's site maintenance plan prepared for the Shopland facilities of the Hungarian portfolio.

Where feasible, **mulching mowers** are used on grassy areas so that grass clippings are finely cut and returned directly to the turf, acting as a natural fertilizer and eliminating the need to bag and dispose of cut grass. Leaves are collected using brooms or mulching equipment and similarly reduced in volume. The site does not have space for on-site composting of landscape debris; therefore, any collected landscape waste (such as fallen leaves, pruned branches, or pulled weeds) is gathered by the maintenance team and sent to off-site composting or green waste facilities rather than thrown away. By doing so, organic waste is diverted from landfills and can be turned into compost or mulch off-site.

Best management practices to further minimize or handle landscape waste include:

- **Regular Maintenance to Avoid Large Waste Volumes:** The landscaping contractor or maintenance staff perform regular, light pruning and trimming, rather than infrequent heavy pruning, to avoid large volumes of cuttings at any one time. Plant health is monitored to remove dead or diseased vegetation promptly (preventing spread and reducing the volume of dead plant matter).

- **On-site Chipping/Mulching:** Small branches or woody trimmings may be chipped on-site and used as mulch around plant beds, where appropriate, to conserve soil moisture and reduce weeds (this also eliminates transporting that waste off-site). If not feasible on-site, all landscape debris is separated and stored for pick-up by a composting service. The **Environmental Responsible** person (groundskeeper or facility manager) ensures all landscape waste, including leaves, grass clippings, and trimmed branches, are collected and prepared for off-site composting. They coordinate with local composting facilities or municipal green waste programs for disposal.
- **Soil Cover and Plant Selection:** As mentioned in the water conservation section, soil in planters is covered with mulch (wood chips) to retain moisture and also suppress weed growth. This reduces the need for excessive trimming of weeds and lowers overall landscape waste. Additionally, selecting native or drought-tolerant plants can reduce leaf drop and pruning needs, while also being adapted to local conditions (though this goes beyond waste management, it helps overall sustainability).

By implementing these practices, landscape waste generation is kept to a minimum and any unavoidable green waste is handled in an environmentally responsible manner.

INDOOR AIR QUALITY MANAGEMENT

Maintaining a healthy indoor air quality (IAQ) is critical for the comfort and well-being of occupants and visitors at Shopland Nyíregyháza. Poor IAQ can cause discomfort or health issues, especially when building works or maintenance activities introduce dust or odors. Therefore, the property has measures in place to protect IAQ during both normal operations and any maintenance, redecoration, refurbishment, or construction activities.

Tenants and contractors must enforce best management practices that minimize impacts on the asset's indoor air quality during any maintenance, renovation, or construction works in the building. This requirement is communicated to all parties before works begin. **Guidance** on minimizing the impact of such activities on IAQ is based on the Sheet Metal & Air Conditioning Contractors' National Association (SMACNA) guidelines: *"IAQ Guidelines for Occupied Buildings Under Construction"*. These guidelines outline strategies to control dust, emissions, and pollutants during building works in occupied buildings.

Poor IAQ is more likely to affect the health of building occupants when construction or renovation projects are ongoing in an occupied space. Dust, odors, or other contaminants escaping from the work area into occupied areas can disrupt business and, in worst-case scenarios, cause discomfort or illness to occupants. Even when contaminants are at harmless concentrations, noticeable dust or smells can create perceived health concerns among building users. Therefore, effective management of IAQ during works requires proactive planning and coordination among designers, contractors, facility managers, building engineers, and tenants.

The following measures (adapted from SMACNA and industry best practices) are to be implemented for any maintenance, redecoration, refurbishment, or construction activities at Shopland Nyíregyháza while the building is occupied:

- **Ventilation System Control:** Avoid running the normal HVAC ventilation systems in areas under construction or renovation when possible. The supply and return vents in the work area should

be closed off or isolated to prevent construction dust from being drawn into the building's HVAC system and distributed to occupied areas.

- **Isolate Work Areas:** Close and cover all air intakes, vents, and ductwork openings in the work zone prior to starting dusty work. Use temporary filters or sealants over vents. Construct temporary barriers or partitions (e.g., plastic sheeting walls or hard barriers) to separate work areas from occupied areas. Doors and windows between construction zones and occupied zones should remain closed and, if possible, sealed with tape or gaskets to contain dust.
- **Dust Suppression and Collection:** Use tools equipped with dust collection systems or HEPA-filtered vacuum attachments when cutting, grinding, or sanding materials to capture dust at the source. Wet methods (mist spraying) can be used when appropriate to keep dust from becoming airborne.
- **Housekeeping During Works:** Perform regular and thorough cleaning of work areas throughout the project. Increase the cleaning frequency in adjacent occupied areas as well, since some dust may escape. Vacuum (with HEPA-filter vacuums) or wet-wipe surfaces in and around the construction zone daily to prevent accumulation of dust. Avoid dry sweeping of construction dust which can send particles back into the air.
- **HVAC Protection and Cleaning:** Protect the building's HVAC system during construction – for example, cover ductwork during installation and keep new HVAC equipment wrapped or covered until installed. After completion of dusty work, inspect and **clean the HVAC ductwork and change HVAC filters** to remove any construction-related particulates that may have been captured. This ensures the system does not circulate contaminants after the project.
- **Scheduling and Coordination:** Plan and coordinate works to minimize disruption. Schedule high-pollutant-generating activities during off-peak hours or times when fewer occupants are present (e.g., overnight or weekends if feasible). Notify tenants in advance of any particularly dusty or odorous work so they can make accommodations (like covering sensitive equipment or scheduling their own off-hours tasks).
- **Entry/Exit and Pathway Management:** Implement measures to avoid tracking dirt and pollutants from the work areas into occupied areas. Workers should use designated entrances/exits for the construction area and, if possible, have sticky walk-off mats at these points to capture dust from shoes. Separate pathways should be identified for construction traffic vs. customer/staff traffic to reduce cross-contamination. Elevators used for construction should have protective liners and be cleaned after use, or a dedicated service elevator should be used if available.
- **Use of Low-Emission Materials:** Whenever maintenance or renovation involves paints, adhesives, sealants, or other chemicals, specify the use of low-VOC (volatile organic compound) or low-odor products to reduce the emission of harmful fumes. This protects IAQ both during and after the project. Adequate ventilation should be provided during any such work until odors dissipate.

During normal building operation (when no construction is occurring), the property management still takes steps to ensure good indoor air quality. This includes regular HVAC maintenance and filter changes (as noted in the Energy section) to provide adequate ventilation and filtration year-round. It

also includes using cleaning products and methods (as noted in the Cleaning section) that do not introduce unnecessary chemicals or particulates into the air. Smoking is prohibited inside the building and designated outdoor smoking areas are positioned away from building air intakes to prevent smoke from entering the ventilation system. By maintaining these day-to-day IAQ controls and being vigilant during any construction activities, the asset protects the health and comfort of all building users.

All policies, procedures, and plans related to indoor environmental quality are reviewed by the Property Manager annually, or sooner in the event of significant changes (such as a major increase in occupant numbers, new tenant types, changes in HVAC operation, or new regulatory requirements). This review ensures that the IAQ management strategies remain relevant and effective for the building's current use and occupant needs. Any necessary updates to procedures will be made and re-communicated to tenants and contractors accordingly.

CLIMATE RISK AND RESILIENCE

In the coming decades, Shopland Nyíregyháza will place strong emphasis on a comprehensive decarbonization strategy to achieve our long-term environmental targets and to mitigate climate-related risks. The management commits to keep under regular review the potential for new technical solutions that can reduce the asset's carbon footprint and improve resilience to climate change. As technologies advance and regulations evolve in the region, the property will set more refined interim targets for carbon reduction and energy performance, to be validated by third-party experts where appropriate. This approach ensures that our climate strategy remains ambitious yet realistic, and in line with national and EU climate objectives.

Climate Change Mitigation Target: The asset (as part of the wider portfolio strategy) aims for a **55% reduction of greenhouse gas (GHG) emissions by the end of 2030** (relative to a baseline year 2023). This target is aligned with global and regional efforts (such as EU targets) to significantly cut emissions by 2030. Achieving it will likely involve a combination of energy efficiency improvements, on-site renewable energy generation, and possibly procurement of green energy.

The technical property manager elected by the Property Management company (Eston International Kft.), is responsible for identifying and implementing best management practices that address climate risks and resilience for the asset. Climate risk considerations include both mitigation (reducing our contribution to climate change via emission reductions) and adaptation (preparing the building and operations for the impacts of climate change such as extreme weather). The following strategies have been adopted at Shopland Nyíregyháza to enhance sustainability and resilience:

- **Energy Saving and Renewables:** Continual efforts to save energy (as detailed in the Energy Use section of this policy) are a core part of decarbonization. This includes reducing electricity and gas consumption through efficiency measures and exploring on-site renewable energy installations (such as solar photovoltaic panels on roofs or solar carport installations in the parking area). By lowering energy demand and generating clean energy, the asset reduces its carbon emissions.
- **Water Saving and Alternative Water Sources:** Water conservation strategies (as detailed in the Water Use section) not only preserve a vital resource but also improve resilience against drought conditions. Additionally, the asset considers the use of alternative water sources

(rainwater harvesting for irrigation, for example) to reduce dependence on municipal water supply and to cope with potential future water shortages.

- **Waste Management and Analysis:** Proper management of waste (detailed in the Waste section) contributes to lower indirect emissions (for instance, methane from landfills) and fosters a circular economy approach. An in-depth analysis of waste generation patterns is periodically performed to find further opportunities to reduce, reuse, or recycle materials, thus continually improving our waste diversion rate and reducing environmental impact.
- **Increased Greenery and Biodiversity:** Wherever possible, the property integrates vegetation into the site (such as maintaining landscaped areas, planting trees or shrubs around the parking lot, etc.). While an urban retail park has limited green space, even small green strips or planters can help. Greenery provides shade (helping to mitigate urban heat island effect), improves stormwater absorption, and contributes to local biodiversity. The management will preserve existing trees on-site and consider adding planters or green walls if feasible, to enhance aesthetics and climate resilience.
- **Sustainable Transportation Facilitation:** The site supports non-motorized and low-carbon transportation options. This includes providing adequate bicycle parking facilities for customers and employees and ensuring they are in safe, convenient locations. Additionally, the property has installed (or plans to install) electric vehicle (EV) charging stations in the parking area to encourage the use of electric cars. By facilitating EV use and bike use, the asset helps reduce transportation-related emissions for visitors and staff. The site is also accessible by public transport, and information about nearby bus stops is made available to visitors (e.g., on the shopping center's website or at entrances), encouraging public transit use.

These strategies are reviewed by the project team on a biannual basis to assess progress and relevancy for the asset's specific location and its occupants. The review looks at key performance indicators (energy consumption trends, water usage, waste diversion rates, carbon footprint data, etc.) and evaluates whether the current strategies are effective or if adjustments are needed. It also considers any new risks (for example, if climate science indicates new local risks like increased flooding, the team will assess if flood mitigation measures at the site are adequate). The outcome of each review is used to update the action plan and, if necessary, set new interim targets. Progress on climate objectives is reported to senior management and may be shared with stakeholders as part of corporate sustainability reporting.

Through these efforts, Shopland Nyíregyháza not only reduces its environmental impact but also improves its operational resilience – meaning the site is better prepared for extreme weather events, energy price fluctuations, and regulatory changes related to climate change.

TIME PERIOD

This Environmental Policy shall be reviewed annually (or more frequently if needed) to ensure it remains effective and up to date. The Asset Manager and Property Manager will initiate the review, especially if there are significant changes in building use, new environmental regulations, or updated corporate sustainability goals. Any proposed updates or additions (for instance, new procedures or targets) will be documented and incorporated into the policy after review.

Senior management will review and formally endorse the environmental performance targets and key initiatives each year as part of this policy's implementation cycle. This endorsement at the highest level underscores the company's commitment to the policy and provides the necessary support and resources for its measures.

This policy takes effect on **2025.01.01.** and shall remain in effect indefinitely until amended and/or replaced by a subsequent environmental policy. All building staff, contractors, and tenants will be notified of any updates to the policy. The latest version of the policy will be made available to all relevant parties (for example, via the property management office or company intranet). By adhering to this policy, Shopland Nyíregyháza and its stakeholders contribute to a more sustainable and responsible operation of the retail park.

Senior Management Approval:

(This policy has been approved by the undersigned representative of the senior management.)

Name: Hajnalka Farkas

Title: Senior Asset Manager

Company: Adventum Group

Signature: _____

A handwritten signature in blue ink, consisting of a large, loopy 'H' followed by a smaller 'F', written over a horizontal line.