SHOPLAND DEBRECEN AIRPORT

Environmental Policy

Shopland Debrecen Airport

4030 Debrecen, Mikepércsi út 73/A, Hungary., Sept 2025.

TABLE OF CONTENTS

1 INTRODUCTION

1.1. General description of the building

The Shopland Debrecen Airport building is located in the southern outskirts of Debrecen, Hungary (4030 Debrecen, Mikepércsi út 73/A, Hrsz. 0493/71), adjacent to the Debrecen International Airport. The site is situated in a commercial and industrial zone with direct access to the main 47 national road and the M35 motorway, ensuring good regional and local transportation links.

The building primarily supports retail and commercial functions as a hypermarket with supplementary tenant units (mall strip) and extensive back-of-house service areas. The facility has a gross internal floor area of ~13,355 m² GEA and 12,144 m² NIA. It was constructed in 2012 and has since undergone minor internal modifications (e.g., adjusted tenant layouts, technical room changes), but no major full-scale renovation.

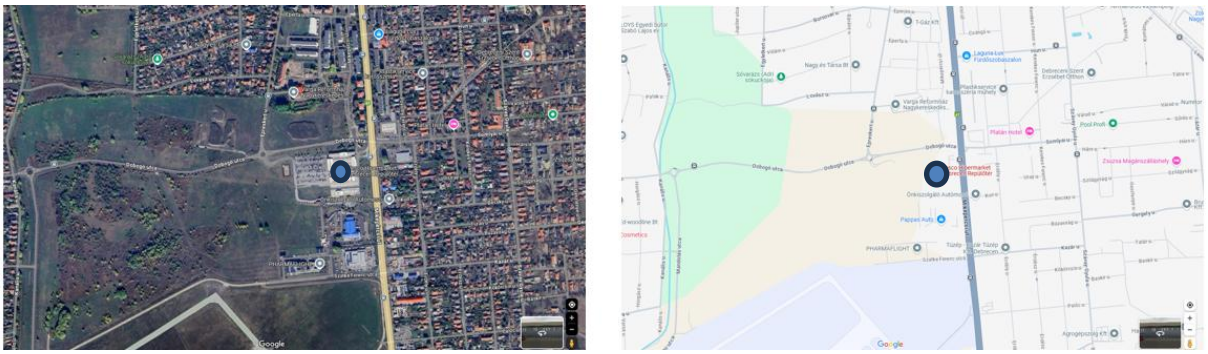

Figure 1.1. – Location of site is marked with blue circle (Source: Google Earth)

The property comprises 1 main above-ground floor and no underground levels. The internal clear height varies, with the hypermarket sales area providing large-volume retail space. The building is visited by several thousand customers daily, with a permanent staff of approximately 100–150 employees and average daily usage of 12–16 hours across 360+ operational days per year.

The net lettable area (12,144 m²) is nearly identical to the gross internal area, as non-lettable circulation and service cores represent only a small fraction of the total floor area. The surrounding site includes 385 paved parking spaces (statutory requirement: 371), service and delivery yards, while the landscaped green areas remain limited (<10% of the total 6.546 ha site). The building has a rectangular footprint and is not subject to national monument protection.

Item	Details
Building name	Shopland Debrecen Airport
Address	4030 Debrecen, Mikepércsi út 73/A, Hungary
Location	Southern outskirts of Debrecen, near Airport
Year of construction	2012
Building shape	Rectangular
Above-ground floors	1
Underground floors	0
Typical floor height	Varies, ~7–9 m in hypermarket zone
Gross Internal Floor Area	13,355 m² GEA
Net Lettable Area	12,144 m² NIA
Non-lettable Area	~1,200 m²
Daily users (average staff)	100–150 employees (+ several thousand visitors)
Average annual operating days	360+ days
Average daily usage	12–16 hours
Outdoor area (paved)	385 parking lots + delivery yards (~20,000 m²)
Landscaped green area	<10% of site

Table 1.1. – Basic Building details

2 PURPOSE OF THE POLICY

Our vision is based on a fundamental belief that by embracing the sustainability agenda and by helping the building users implement sustainability strategies that reduce costs and generate value, our own business will become more sustainable, grow stronger and thrive. We recognize our responsibility to the tenants and any building users, both present and future. We are committed to helping secure a better, more sustainable future for all.

The direction of Shopland's policy:

- We will provide a clear framework that enables tenants and their staff to promote and develop sustainable business outcomes within the shopping center environment.
- We will set a site-specific sustainability strategy and establish reporting procedures to ensure continual improvement of Shopland Debrecen Airport's environmental and social performance.
- We will ensure that the property management team and facility staff are involved in the implementation of this policy and receive training to maintain a comprehensive understanding of sustainability, climate change, and their impact on the asset.

3 SCOPE

We will act as an advocate for sustainability in the wider business community of Debrecen Airport by actively engaging with suppliers, service providers, and business partners to encourage solutions that contribute to a more sustainable society.

- This Environmental Policy applies to the entire Shopland Debrecen Airport building.
- The Environmental Policy, together with all referenced supporting procedures, guidance, and information, shall be implemented by all parties involved with Shopland Debrecen Airport, including the Property Manager, Facility Management team, and their sub-contractors.
- The Property Manager shall also encourage tenants to adopt and follow the principles set out in this policy, thereby aligning tenant operations with the overall sustainability goals of the building.

4 GOALS

This Environmental Policy sets out our position on environmental sustainability, recognizing the responsibility of operating a major retail destination at 4031 Debrecen, Kishegyesi út 1–11. (Hrsz. 19041), with multiple tenants and a significant presence in the local community. The philosophy and approach set out in this policy shall be applied to the management of all activities with a significant environmental impact. It is designed as a guiding framework for tenants, the property management team, facility managers, and service providers, ensuring that daily operations are aligned with the sustainability objectives of Shopland Tesco Airport Debrecen.

Our long-term objectives are to:

- We will provide a clear framework that enables tenants and their staff to promote and develop sustainable business outcomes within the shopping center environment.
- We will set a site-specific sustainability strategy and establish reporting procedures to ensure continual improvement of the site's environmental and social performance.
- We will ensure that the property management team and facility staff are involved in the implementation of this policy
- We will act as an advocate for sustainability in the wider business community of Debrecen by actively engaging with suppliers, service providers, and business partners to encourage solutions that contribute to a more sustainable society.
- This Environmental Policy applies to the entire Shopland Tesco Airport Debrecen building and its associated car park and landscaped areas.
- The Environmental Policy, together with all referenced supporting procedures, guidance, and information, shall be implemented by all parties involved with Shopland Tesco Airport Debrecen, including the management and their sub-contractors.
- The Management shall also encourage tenants to adopt and follow the principles set out in this policy, thereby aligning tenant operations with the overall sustainability goals of the building.

Commitments:

- The building will be operated responsibly to protect the environment and to safeguard the health and safety of employees, tenants, and all building users.
- All activities will be carried out with respect and care for both the local and global environment.
- Environmental risk management – including Legionella monitoring, refrigerant management, roof renovation and rainwater drainage controls, and emergency response planning – is embedded into building operations.
- Efforts will be made to reduce the carbon and ecological footprint of the site, leading by example for the wider community to support a better quality of life for everyone.
- The building is committed to aligning with international decarbonization pathways through upgrades to building systems, improved energy efficiency

5 STRATEGY FOR SHOPLAND DEBRECEN AIRPORT

Environmentally sustainable best practice will focus on the key areas outlined in the following subsections. Each subsection follows a consistent structure: first, the current measures and procedures are presented and explained; then, where applicable, future improvements and performance targets are described. This approach provides a clear pathway from existing performance towards continuous improvement.

For Shopland Debrecen Airport, the priority areas include resource management (energy, water), waste reduction, sustainable procurement, pollution prevention, biodiversity enhancement, transport and mobility, and climate resilience.

Detailed information, including energy audits, CO_2 reduction reports, tenant-level consumption data, maintenance logs, and monthly water use summaries, is available in the Facility Management system and the Building User Guide. These documents serve as technical references for tenants, facility managers, and auditors, supporting informed decision-making and compliance with environmental objectives.

5.1 Resource management

- We are committed to the responsible management of energy and water and promote the conservation of these resources in all building operations.
- The use of resources, such as energy and water, is regularly monitored. At Shopland Debrecen Airport, consumption data is collected via building-level utility meters and sub-metered tenant areas, complemented by annual energy audits. This data is used to understand usage patterns, detect potential inefficiencies, and establish reduction targets. Any exceptional readings are investigated as part of the monitoring process.
- The results of monitoring are reported to management on a regular basis and can be shared with tenants through the facility management platform.
- Utility invoices are issued monthly to provide transparency and facilitate tenant engagement in resource efficiency.
- The building is operated with a central HVAC system supported by gas-fired boilers, a central chiller, and fan coil units for tenant spaces. Rooftop ventilation units include heat recovery, and the building benefits from 100% LED lighting indoors and outdoors.
- Timed programs and zone-based setpoints are applied to optimize energy savings. Energy-efficient equipment is in place, including variable-speed pumps and fans, heat recovery systems, and a proactive maintenance policy.
- Daylight is available in all tenant areas, with glazing covering at least 10% of the façade and roof surfaces, ensuring compliance with daylighting requirements. Shading devices are present in at least 50–80% of relevant workspaces, while artificial lighting is fully compliant with Hungarian standards. Lighting controls and dimmable systems are available in most tenant areas, and flicker-free LED fixtures are installed throughout.
- Motion sensors are installed in toilets and circulation areas to reduce unnecessary electricity use. Outdoor lighting is provided by LED luminaires with automatic energy-saving controls and dark-sky compliant optics.
- Water management relies on low-consumption fixtures (≥75% of WCs ≤4.5 L/flush, low-flow taps and urinals), supported by a building-level water strategy that includes periodic leak detection, fixture replacement, and proactive maintenance policies. No rainwater harvesting or reuse systems are currently in place, though the drainage system is maintained annually and prevents flooding or backflow incidents.

5.1.1 Energy management

- A sophisticated Building Management System (BMS) controls the building's central HVAC system,

including chillers, gas-fired boilers, fan coil units for tenant spaces, rooftop units with heat recovery, and LED lighting, as well as technical alarms. Web-based remote access is available for authorized personnel, such as the technical manager. Timed programs and zone-based settings are applied to optimize energy performance.

- Low-energy and energy-efficient equipment have been installed across Shopland Debrecen Airport, including variable-speed (frequency-controlled) pumps and fans, as well as rotary heat recovery units. The systems are designed to provide automated controls, reducing the need for manual intervention by building users.
- Heat recovery is integrated into the rooftop ventilation units, reducing heating demand during winter. Water is permanently circulated in the primary circuit, and the units can be used for both heating and cooling depending on the season.
- Daylight is available in all tenant spaces, with façade and roof glazing exceeding 10% of surface areas, and at least 50–80% of occupied areas meeting minimum daylighting requirements. The hypermarket interior relies primarily on an energy-efficient artificial lighting system.
- The general lighting system comprises 100% LED luminaires indoors and outdoors, with a complete retrofit finalised in 2023, all of which are controlled by the BMS. Motion sensors are installed in toilet blocks and circulation areas to prevent unnecessary electricity consumption.
- While tenant-specific lighting systems may vary according to their interior design and functional requirements, tenants are encouraged through fit-out guidelines to choose LED lighting and energy-efficient appliances.

Tenants are asked to:

- Switch off lights and heating/cooling when leaving their workplace, and unplug devices where possible.
- Keep windows closed when heating/cooling is on.
- Use interior blinds at night in wintertime to improve insulation.
- Maximize daylight use during the day to reduce artificial lighting demand.

Future improvements and targets

- Introduce a formalised energy reduction programme for tenants, including awareness campaigns and annual reporting.
- Develop and implement a Green Lease framework with tracking of tenant-level energy and water consumption.
- Assess the feasibility of rooftop photovoltaic installation, noting that no renewable generation is currently in place.
- Investigate further HVAC optimization opportunities, including potential replacement of older rooftop ventilation units and chillers with higher-efficiency models.

5.1.2 Water management

- Various measures are already in place and under development to reduce water consumption and improve efficiency.
- In Shopland Debrecen Airport, common-area washbasins are equipped with low-flow aerators (≤ 4

l/min), and many tenant areas also use water-saving fixtures

- Toilets are fitted with dual-flush cisterns (≥ 75% ≤ 4.5 l/flush, remainder ≤ 6 l/flush) and water-efficient push-plate mechanisms.
- Urinals are equipped with timed flushing systems (≤ 3 l/flush), reducing unnecessary water use.
- Showers are not fitted with low-flow fixtures (0%).
- Legionella prevention is an integral part of operational policy: hot water temperature is maintained above 50 °C, thermostatic mixing valves are used where required, and Legionella testing has been carried out.
- Water consumption in common areas is centrally metered for the whole building with a main water meter; data is collected for comparison against targets.
- Annual maintenance of the rainwater drainage system prevents flooding incidents.
- Leak detection has recently been introduced via new devices, but automatic shut-off valves are not yet in place.

Tenants are asked to:

- Turn off taps after use where manual taps are installed.
- Report any leaks immediately to the facility manager.
- Use water-efficient equipment where possible and comply with fit-out requirements for low-flow fixtures.

Future improvements and targets

- Install additional infrared-controlled taps in tenant areas and consider waterless urinals where appropriate.
- Explore feasibility of rainwater or greywater reuse for toilet flushing as a long-term solution.
- Investigate potential for rainwater or greywater reuse, although no harvesting or reuse systems are currently in place.
- Enable tenant-level water consumption reporting via the APFM platform and explore incentive schemes to encourage reduced consumption.

5.1.3 Waste management

Shopland Debrecen Airport supports selective waste collection and ensures compliance with Hungarian waste management legislation (MOHU system and local municipal rules). Measures for waste segregation and collection are already implemented and operational throughout the building. Waste is separated into the main streams required by law: communal waste, selective recyclables (paper/cardboard, plastics, glass – where requested), and small quantities of hazardous operational waste (e.g. fluorescent tubes, batteries, used cooking oil, cleaning chemicals).

- Designated selective collection points are located in service corridors and back-of-house areas, accessible to all tenants. Facility management regularly communicates the waste management procedures and expectations to tenants.
- In customer areas, color-coded collection bins for paper, plastics, and residual waste are placed in visible, easy-to-access locations.
- Hazardous waste is collected in sealed, labelled containers and handled by licensed contractors in compliance with regulatory requirements.

- Waste generation data is collected separately for tenants, allowing facility management to monitor performance.
- Construction and demolition waste facilities are available, and reusable building products can be stored at nearby facilities.
- No materials inventory has been completed for the building in the last five years.

Tenants are asked to:

- Ensure that their staff follow the waste management guidelines communicated by facility management.
- Separate waste correctly at source and cooperate with facility management during inspections and audits.

Future improvements and targets

- Develop a formal Waste Management Strategy with reduction targets for operational waste.
- Expand selective collection to cover additional fractions such as metal, glass in all tenant spaces, and biodegradable food waste, going beyond the minimum municipal requirements.
- Introduce formal reporting on tenant-level waste streams, integrating the data into the FM platform.
- Achieve a 25% reduction in operational waste generation within 2–3 years and up to 50% over a 10-year horizon.
- Discourage the use of single-use plastics and encourage restaurants and cafés to adopt reusable or biodegradable alternatives.
- Investigate opportunities for food donation programs with local charities to redirect surplus food.
- Introduce separate collection for biodegradable food waste in the food court where donation is not possible.
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5.2 Sustainable procurement

Every purchased product and service has an impact on the environment and, consequently, on human health throughout its life cycle. Purchasing choices, as well as decisions on recovery and disposal of materials, affect not only the local community but also global ecosystems. The goal is to minimise these impacts by prioritising materials that are recyclable, eco-certified, or supplied by vendors with verifiable sustainability commitments. Partners and suppliers are expected to follow the same philosophy, and tenants are encouraged to adopt these principles through Green Lease clauses and fit-out guidelines.

Sustainable procurement is already applied in limited form within daily operations. The facility management organization has a procurement policy that requires sustainable maintenance, repair, and refurbishment practices, and applies sustainability criteria to consumables and equipment. Cleaning agents, maintenance consumables, and technical replacement parts are selected with preference for eco-certified, low-emission, durable alternatives. Procurement decisions take into account environmental management principles and focus on long-term performance and reduced life-cycle impacts. Procurement is already partially integrated into daily operations. Cleaning agents, maintenance consumables, and technical replacement parts are selected with preference for eco-certified, low-emission, durable alternatives. Procurement decisions take into account environmental management principles and focus on long-term performance and reduced life-cycle impacts.

About our green procurement philosophy:

- Consider the entire life cycle of a product: from raw material acquisition and production impacts to packaging, transport, use-phase energy/water consumption, and end-of-life recycling or disposal options.
- Choose products that are less damaging to the environment and human health, focusing on "greener" rather than necessarily "the greenest" option, to ensure that operational needs are met responsibly.
- Give equal weight to environmental and social considerations alongside price, availability, and performance.
- Prefer products and suppliers that support Fair Trade, low-carbon logistics, and local or regional sourcing where feasible.
- Formalized a Green Procurement Policy covering all facility operations, including supplier selection, eco-certification requirements, and life-cycle impact evaluation.

Current limitations

- No comprehensive materials inventory has been completed in the past five years.
- There is no formal, building-wide Green Procurement Strategy covering all suppliers and tenants.

Future improvements and targets

- Formalise a Green Procurement Policy covering all facility operations, including supplier selection, eco-certification requirements, and life-cycle impact evaluation.
- Expand procurement criteria to explicitly include packaging minimisation, recycled content, and take-back programs for suppliers.
- Increase tenant engagement by providing guidance and training sessions on sustainable product selection and waste reduction in fit-outs.
- Develop a central reporting mechanism to track and publish the share of environmentally preferable products purchased annually.

5.3 Responsible refurbishment practices

Refurbishment works, tenant fit-outs, and material replacements at Shopland Tesco Debrecen Airport are carried out with consideration for their environmental and health impacts across the entire life cycle. Decisions made during these works affect not only the local community but also global ecosystems. The goal is to minimize these impacts by prioritizing materials that are recyclable, eco-certified (e.g. EU Ecolabel, FSC, PEFC), or supplied by vendors with verifiable sustainability commitments. Partners and suppliers are expected to follow the same philosophy, and tenants are encouraged to adopt these principles through fit-out guidelines and Green Lease clauses.

Responsible refurbishment practices are already applied in limited form within daily operations. When replacing or upgrading systems (e.g. HVAC filters, lighting components, flooring, or partitions), preference is given to eco-certified, low-emission, and durable alternatives. These decisions take into account environmental management principles and focus on long-term performance, safe indoor air quality, and reduced life-cycle impacts. However, the building does not currently have a formal materials inventory or dedicated adaptation strategy.

Our main guidance lines regarding refurbishments are the following:

- Consider the entire life cycle of a product: from raw material Airportction and manufacturing impacts to packaging, transportation, use-phase efficiency, and end-of-life recycling or disposal.
- Choose products that are less damaging to the environment and human health, focusing on solutions that meet functional needs responsibly.
- Give equal weight to environmental and social considerations alongside price, availability, and performance.
- Prefer products and suppliers that support Fair Trade, low-carbon logistics, and local/regional sourcing where feasible, especially for interior finishes, consumables, and food court fit-outs.

Future improvements and targets

- Formalize a Responsible Refurbishment Policy covering tenant fit-outs and common-area refurbishments, including supplier selection, eco-certification requirements, and life-cycle impact evaluation. A Green Procurement Policy covering all facility operations, including supplier selection, eco-certification requirements, and life-cycle impact evaluation.
- Expand procurement criteria to explicitly include packaging minimization, recycled content, and supplier take-back programs.
- Increase tenant engagement by providing guidance and training sessions on sustainable product selection and waste reduction in fit-outs.
- Develop a central reporting mechanism to track and publish the share of environmentally preferable products purchased annually.

5.4 Biodiversity

To understand the ecological value of the site, an ecological baseline assessment was carried out as part of the sustainability program. The property is located in a densely built commercial and service zone in the western outskirts of Debrecen (4031 Debrecen, Kishegyesi út 1–11., Hrsz. 19041), with extensive surface parking areas and a single main retail building.

As a result, the site currently has limited biodiversity potential, with approximately 20–40% of the total plot area maintained as green space (based on the ecological survey), mostly in the form of lawn surfaces, scattered trees, and perimeter planting beds.

Existing vegetation is concentrated along the property boundaries, within roadside green strips, and in landscaped planting islands near pedestrian walkways and parking areas. These areas are primarily composed of lawn grass and ornamental shrubs, and there are currently no green roofs, rain gardens, or designated habitat features on site. Nevertheless, the planted areas provide habitat value that significantly supports local native species.

Future improvements and targets

- Increase the proportion and ecological quality of green areas by planting native, drought-tolerant, and pollinator-friendly species along parking zones and pedestrian pathways.
- Investigate the feasibility of introducing green infrastructure solutions such as green roofs or living walls on suitable roofs and façade surfaces during future refurbishment works.

- Develop a Biodiversity Action Plan (BAP) that sets measurable targets for species diversity and canopy coverage and defines monitoring and maintenance responsibilities.
- Introduce biodiversity-enhancing features, such as insect hotels, bird boxes, bat boxes, and flowering meadow patches to support local fauna.
- Maintain a night-time light pollution policy for outdoor lighting, ensuring that all new or replacement luminaires meet ULOR 0.0 requirements and minimise disturbance to nocturnal species.

5.5 Pollution prevention

Detailed information on specific polluting materials and their management at Shopland Debrecen Airport is available in separate documents, including the Indoor Air Quality Policy, Refrigerant Replacement Strategy, and the Facility Maintenance & Safety Protocols.

The main points are summarized below:

- Minimising the use of VOC-emitting materials: During refurbishments, fit-outs, and maintenance works, only low-VOC paints, adhesives, sealants, and coatings are specified, in line with BREEAM HEA 02 and HEA 09 requirements. Tenant fit-out guidelines also require compliance with these standards.
- Careful evaluation of products containing toxic substances, organic solvents, or other potentially hazardous components prior to purchase.
- Strict prohibition of hazardous substances such as lead, PCBs, asbestos, cadmium, crystalline silica, and radioactive isotopes in all construction and maintenance works.
- Gradual replacement of technical equipment to minimise the use of ozone-depleting and high-GWP refrigerants. Rooftop units are being progressively replaced with models operating on R32 refrigerant (GWP ≈ 675), and the site does not use ozone-depleting substances (ODS).
- Outdoor lighting is provided by LED luminaires with ULOR = 0 %, preventing upward light pollution and reducing disturbance to nocturnal species.

Future improvements and targets

- Minimizing the use of VOC-emitting materials: During refurbishments, fit-outs, and maintenance works, only low-VOC paints, adhesives, sealants, and coatings are specified. Tenant fit-out guidelines also require compliance with these standards.
- Careful evaluation of products containing toxic substances, organic solvents, or other potentially hazardous components prior to purchase.
- Strict prohibition of hazardous substances such as lead, PCBs, asbestos, cadmium, crystalline silica, and radioactive isotopes in all construction and maintenance works.
- Gradual replacement of technical equipment to minimise the use of ozone-depleting and high-GWP refrigerants. Chillers and rooftop units are currently operated with standard refrigerants, and older systems are being phased out in favour of R32 models (GWP ≈ 675). No ozone-depleting substances (ODS) are in use.
- Oil and grease separators are installed in the drainage system (including kitchen areas), and hazardous liquids are stored in bunded containers sized for 110% of the stored volume.
- Outdoor lighting is provided by LED luminaires with ULOR = 0% optics, preventing upward light pollution and reducing disturbance to nocturnal species. pollution and reducing disturbance to nocturnal species.

5.6 Transportation

Shopland Debrecen Airport acknowledges that transport accounts for approximately one-quarter of EU greenhouse gas emissions, making it the second-largest emitting sector after energy production. As a result, efforts are made to actively promote alternative transportation modes — including public transport, cycling, and car sharing — to reduce CO_2 emissions associated with travel to and from the shopping center.

- Shopland Tesco Debrecen Airport acknowledges that transport accounts for approximately one-quarter of EU greenhouse gas emissions, making it the second-largest emitting sector after energy production. As a result, efforts are made to actively promote alternative transportation modes — including public transport, cycling, and car sharing — to reduce CO_2 emissions associated with travel to and from the shopping center.
- The site is located along Kishegyesi út, with bus stops for several local lines within 200 m of the main entrances, providing regular peak-hour service. The Building User Guide and tenant communication channels provide detailed information on available routes and timetables for visitors and staff.
- Accessible parking spaces (≥4%) are designated near the entrances, in compliance with local regulations and accessibility requirements.
- Multiple bicycle racks are installed near pedestrian entrances, with showers and changing facilities available for cyclists as part of the tenant support infrastructure.

Future improvements and targets:

- Develop and implement a Sustainable Mobility Strategy for the site, prioritizing the installation of EV charging stations, enhanced cycling infrastructure (e.g., covered and secure racks), and improved integration with local public transport services.
- Investigate opportunities to partner with e-mobility and car-sharing providers to introduce shared mobility options on-site.
- Continue the program of refrigerant replacement, with a long-term goal of using only very low GWP refrigerants (≤ 10) in all new installations.
- Launch awareness campaigns targeting tenants and staff to encourage sustainable commuting, reduce single-occupancy car use, and promote walking and cycling where feasible.

5.7 Climate resilience

Shopland Debrecen Airport recognises the growing importance of climate adaptation and resilience in the face of rising temperatures, more frequent heatwaves, and extreme weather events. As part of the environmental commitment, the goal is to ensure that the building's infrastructure and operational practices are prepared for long-term climatic shifts and aligned with international sustainability frameworks.

Current Measures:

- A Building Management System (BMS) that helps adjust heating, cooling, and ventilation during heatwaves or other climate stress events. No overheating has been reported in tenant spaces during heatwaves, as the central air-handling unit provides stable cooling, supplemented by tenant-level fan coil units.
- A complete LED lighting upgrade, maintenance of rooftop units, and the gradual replacement of refrigerants with lower-GWP alternatives (R32).
- Annual maintenance of the stormwater drainage system (including full flushing of pipes) ensures capacity remains sufficient. No flooding or ponding incidents have been recorded.
- Past storm events caused minor facade and parking area damage (trees uprooted, tiles displaced), which have been repaired, and replacement planting is ongoing.
- The site is not affected by drought-related restrictions, as water supply is reliably available from the municipal network. Low-flow fixtures and aerators have been installed to reduce unnecessary consumption.

- Emergency protocols covering heatwaves, storms, and flooding are in place, with insurance covering storm-related damage.
- Developed formal Climate Risk Assessment in line with BREEAM and European best practice, covering flood, heat, storm, and drought risks.

Future goals include:

- Planting more greenery and adding shading solutions to reduce heat stress in summer, with a focus on drought-tolerant, pollinator-friendly species.
- Exploring the opportunity to use of on-site renewable energy to improve energy independence.
- Strengthening climate risk monitoring and reporting in line with European best practice.

6.1 Tenant and staff involvement

The Owner of Shopland Debrecen Airport is responsible for ensuring that the Environmental Policy is distributed to all relevant parties involved in the management and operation of the shopping centre.

- To provide stakeholders with knowledge, education, and general awareness on environmental topics and sustainable practices.
- Ensure that property and facility management teams schedule and deliver staff trainings as needed to support the sustainable and efficient use of the building.
- Promote the inclusion of environmental content in tenant communications, internal newsletters, and building user guides to strengthen awareness and engagement.
- Forward any required reporting on environmental performance, incidents, or improvement initiatives to the designated building management contacts for review and follow-up.

In addition, tenants are asked to follow these points:

- Leverage online meeting tools (video conferences, conference calls) where possible to reduce travel-related emissions.
- Communicate across employees, other tenants, and stakeholders to share best practices and support a collaborative sustainability culture within the building.

6.2 Compliance with laws and regulations

The Environmental Policy fully complies with all applicable Hungarian and EU environmental laws, regulations, and standards. Compliance ensures that operations are legally sound, environmentally responsible, and aligned with best practices. This includes, but is not limited to:

- Energy efficiency and building operation requirements, such as Government Decree 176/2008 and relevant EPBD transpositions.
- Water quality and usage regulations, including Legionella prevention measures and regular monitoring obligations.
- Waste management legislation, ensuring selective collection and proper treatment of municipal and hazardous waste in line with the National Waste Management Plan.
- Air quality and indoor environmental standards, including limits on volatile organic compounds (VOCs) and emissions from technical systems.
- Occupational health and safety (OHS) regulations, guaranteeing a safe working environment for all staff, contractors, and tenants.

Property and facility management teams continuously monitor regulatory updates and ensure operational procedures remain compliant. Evidence of compliance — including inspection reports, maintenance logs, and environmental performance records — is stored securely and made available for audits and regulatory inspections.

7 RESPONSIBILITIES, CONTACTS

The Management is responsible for ensuring that the Environmental Policy is implemented effectively and that all relevant stakeholders are informed of the aims and objectives established for Shopland Debrecen Airport.

This Environmental Policy shall be reviewed at least every three years or earlier if significant operational, legal, or environmental changes occur. The latest review was conducted in September 2025 for Shopland Debrecen Airport.

The Policy remains in effect until the next scheduled review or until it is updated and re-approved. Any changes shall be communicated to all relevant stakeholders.