SHOPLAND DEBRECEN EXTRA

Environmental Policy

Shopland Debrecen Extra

4031 Debrecen, Kishegyesi út 1–11., Hungary., Sept 2025.

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1 INTRODUCTION

The Shopland Debrecen Extra building is located in the western part of Debrecen, Hungary (4031 Debrecen, Kishegyesi út 1–11., Hrsz. 19041). The site is situated in a commercial retail zone along one of the city's arterial roads, with direct connection to the M35 motorway and well-served by regional and local public transport, including low-floor bus lines. Pedestrian crossings and barrier-free access routes ensure good connectivity for visitors arriving on foot or by bicycle.

The building primarily functions as a large hypermarket anchored retail property, supplemented by smaller tenant units, customer services, and back-of-house service areas. It is situated on a spacious site with extensive paved areas and large surface parking facilities exceeding 1,000 spaces (including 24 accessible bays), while landscaped green areas remain limited (<10% of the site).

The facility has a gross internal floor area of 21,982.6 m² and a net lettable area of ~21,900 m², with non-lettable circulation and service areas accounting for only a minor fraction. According to Shopper Park Plus corporate reports, the asset is recorded with a gross leasable area (GLA) of 26,974 m², reflecting additional rental spaces and extensions across the retail park portfolio.

The building was constructed in 1999 and underwent a significant refurbishment in 2003–2004, including internal modernization and tenant reconfiguration. Waterproofing works on the main roof were completed in Q4 2024, and further building envelope and technical system upgrades are planned as part of the portfolio-wide ESG program.

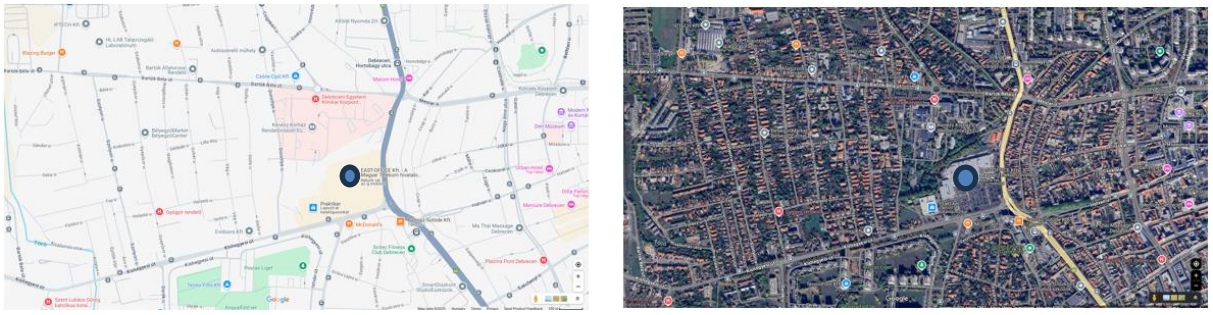

Figure 1.1. – Location of site is marked with blue circle (Source: Microsoft Bing Map)

The property comprises one above-ground floor and no underground levels. The internal clear height varies, with the hypermarket sales area providing large-volume retail space suitable for both sales and storage functions. The building is visited by several thousand customers daily, with a permanent staff of approximately 150–200 employees and operates 12–16 hours a day for more than 360 days annually.

This property is a core asset in Shopper Park Plus Plc's publicly listed retail park portfolio, which covers over 320,000 m² GLA across 18 sites (14 in Hungary and 4 in the Czech Republic). As part of its long-term asset management strategy, the company targets BREEAM "Very Good" certification levels and portfolio-wide energy savings of up to 30% through efficiency upgrades and technical refurbishments.

Item	Details
Building name	Shopland Debrecen Extra
Address	4031 Debrecen, Kishegyesi út 1–11., Hungary
Location	Western outskirts of Debrecen, along Kishegyesi út
Year of construction	1999
Years of refurbishment	2003–2004 (major renovation), 2024 (roof waterproofing)
Building shape	Rectangular retail park layout
Above-ground floors	1
Underground floors	0
Typical floor height	~7–9 m in hypermarket zone
Gross Internal Floor Area (GIFA)	21,982.6 m²
Net Lettable Area (NLA)	~21,900 m²
Gross Leasable Area (GLA, portfolio figure)	26,974 m²
Non-lettable Area	<100 m²
Daily users (average staff)	150–200 employees (+ several thousand visitors)
Average annual operating days	360+
Average daily usage	12–16 hours
Outdoor area (paved)	>30,000 m², including ~1,000 parking spaces (24 accessible)
Landscaped green area	<10% of site
Ownership / Management	Shopper Park Plus Plc (listed REIT)

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 in the 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 Extra'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 Extra 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 Extra building.
- The Environmental Policy, together with all referenced supporting procedures, guidance, and information, shall be implemented by all parties involved with Shopland Debrecen Extra, including the Property Manager, Facility Management team, and their sub-contractors.
- 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.

4 AIMS

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 Extra 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 Extra 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 Extra Debrecen
- 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, climate and natural hazard risks, 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 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 EXTRA

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 Extra, 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 BMS energy consumption reports, tenant sub-metering data, maintenance logs, and monthly water consumption summaries, is available in the digital Building User Guide and the Facility Management platform (APFM). 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 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 Extra, consumption data is collected via ultrasonic main water meters and tenant-level submeters with remote reading, as well as through the BMS platform which records gas and electricity use. 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 APFM digital platform.
- Utility invoices are issued monthly to provide transparency and facilitate tenant engagement in resource efficiency.

The building is operated using a Building Management System (BMS) that controls the main HVAC systems, gas-fired boilers, rooftop units with heat recovery, and LED interior and exterior lighting. Remote web-based access is available for facility management, allowing for efficient oversight and control.

Timed programs and zone-based setpoints are applied to optimize energy savings. Energy-efficient equipment is in place, including frequency-controlled pumps, heat recovery units, and a full LED retrofit completed in 2023.

Daylight is primarily available in entrance areas and selected tenant shopfronts, while the hypermarket interior relies on artificial lighting. Motion sensors are installed in toilets and circulation areas to reduce unnecessary electricity use. Outdoor lighting is provided by LED luminaires with ULOR 0.0 optics, eliminating upward light pollution and supporting dark-sky compliance.

5.1.1 Energy management

- A sophisticated Building Management System (BMS) controls the building's heating system, chillers, gas-fired boilers, rooftop units with heat recovery, interior and exterior LED lighting, and 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 Tesco Debrecen Extra, including frequency-controlled pumps and 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 season.
- Daylight is primarily available at the entrance and selected perimeter units; the hypermarket interior is lit by an energy-efficient artificial lighting system.
- The general lighting system comprises 100% LED luminaires, 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 formalized energy reduction program 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 to generate on-site renewable electricity.
- Investigate further HVAC optimisation opportunities, including possible replacement of aging rooftop units 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 Extra, 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 ≤ 4.5 l/flush cisterns (dual-flush systems) and water-efficient push-plate mechanisms.
- Urinals are equipped with timed flushing systems (≤ 3 l/flush), reducing unnecessary water use.
- 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 risk assessments are carried out annually.
- Water consumption in common areas is centrally metered with an ultrasonic water meter, integrated

into the BMS for monthly reporting. Abnormal readings trigger immediate investigation by facility management.

- Shut-off valves are installed, enhancing protection against uncontrolled water loss.
- Developed a policy requiring the installation of water-saving equipment during refurbishments and maintenance works.

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.
- 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 Extra 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, colour-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.

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.
- 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.

5.2 Sustainable procurement

Every product purchased 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 prioritizing 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 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 consider 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.

Future improvements and targets

- 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 Extra 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 partially integrated into 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.

Our main guidance lines regarding refurbishments are the following:

- Consider the entire life cycle of a product: from raw material extraction 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.

5.3 Responsible refurbishment practices

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 5–20% of the total plot area maintained as green space, 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.

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 roof 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 Extra 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 minimize 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 minimize the use of ozone-depleting and high-GWP refrigerants. Chillers and rooftop units operate with low-impact refrigerants (≤ GWP 10 in new installations), and older units are being phased out in favor of R32 models (GWP ≈ 675). The site does not use ozone-depleting substances (ODS).
- Oil and grease separators are installed in the drainage system (particularly for food court 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 %, preventing upward light pollution and reducing disturbance to nocturnal species.

5.6 Transportation

Shopland Debrecen Extra 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 Extra 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.
- A minimal number of EV charging stations is already in place, with expansion (2–4 dual chargers) planned as part of mobility upgrades in the near future.

Future improvements and targets:

- Develop and implement a Sustainable Mobility Strategy for the site, prioritising 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.
- Increase the number of alternative transportation features, such as secure bike storage, e-scooter docking points, and preferred carpooling spaces, and communicate these options proactively to tenants and visitors.
- 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 Extra 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.
- A complete LED lighting upgrade, maintenance of rooftop units, and the gradual replacement of refrigerants with lower-GWP alternatives (R32).
- Ongoing roof renovation to address past leakage and hail damage, increasing protection against storms.
- Stormwater drainage with flow regulators and controlled discharge to the municipal system, reducing the risk of local flooding.
- Emergency protocols covering heatwaves, storms and flooding.
- Exploring the opportunity to use of on-site renewable energy to improve energy independence.

<u>Future goals include:</u>

- Planting more greenery and adding shading solutions to reduce heat stress in summer.
- Exploring the 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 Extra 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 contracts 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

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 Extra.

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

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.