

**KRYALOS**  
SOCIETÀ DI GESTIONE DEL RISPARMIO

# Sustainability Report

2021



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# Letter to stakeholders



Dear Stakeholders,

Kryalos SGR is aware of the impact that its actions and business activities have on the environment, social and governance matters. For this reason, it has decided to undertake a sustainability journey aimed at consolidating and developing the process of integrating ESG aspects within the Company and its business activities.

Through this first Sustainability Report, Kryalos intends to communicate its actions in relation to the environmental, social and governance dimensions, as well as to highlight the goals that the SGR has set for the future.

For Kryalos, sustainability is a continuously evolving pathway/journey. Through our funds, we attempt to create more efficient building, that are better integrated in their surrounding location. We are also, where possible, working on common spaces accessible to the community in order to create shared value.

This path is also reflected in our people, who contribute to the success of Kryalos every day, with passion, professionalism and dedication.

This first Sustainability Report represents a starting point that strengthens our dialogue with stakeholders and creates a positive impact for society, the environment, and the development of our country.

“

For Kryalos, sustainability is a continuously evolving pathway/journey. Through our funds, we attempt to create more efficient building, that are better integrated in their surrounding location. We are also, where possible, working on common spaces accessible to the community in order to create shared value.

”

**Paolo Bottelli**

Founder and Chief Executive Officer

# Methodological note

**This document is the first Sustainability Report for Kryalos and aims to describe the initiatives and main economic, social, and environmental results achieved, as well as the goals to pursue in this direction.**

This document contains qualitative and quantitative information related to issues of 'materiality' for Kryalos and its Stakeholders. The data and information of this document refer to Kryalos SGR S.p.A.. These were collected by the representative of the corporate functions involved through data collection forms. The data used was extracted from the Company's data systems, and have been calculated based on the results from accounting and information systems.

The Sustainability Report has been prepared in accordance with the "GRI Sustainability Reporting Standards", defined in 2016 and subsequent version by the Global Reporting Initiative (GRI) in conformity with the option "Referenced". The "GRI Content Index" with details of the reported content is included in the appendix.

The data and information reported in this document are based on the principles of balance, comparability, accuracy, timeliness, reliability, and clarity that ensure the quality of reporting as defined by the GRI Standards.

The document describes, through quantitative data, the main results in terms of sustainability performance achieved during 2021 (January 1 - December 31). It should be noted that qualitative data, in addition to the year 2021, can also refer to

2022. FY2020 data have been included to provide the reader with a benchmark of economic, social, and governance performance. Thus, enabling an assessment of the performance of Kryalos' activities during the two-year period.

To ensure the reliability of the data, the use of estimates has been limited as much as possible. Such estimates, if any, have been appropriately reported and defined on the basis of established methodologies and calculation criteria.

Detailed information and tables are provided as an essential part of this document, in order to give complete evidence of the coverage of GRI indicators associated with each observation area. The Sustainability Report will be drafted on an annual basis.

This Report received approval from the Board of Directors on December 20, 2022.

The document is also available on the website [www.kryalossgr.com](http://www.kryalossgr.com), while at the e-mail address [info@kryalossgr.com](mailto:info@kryalossgr.com) it is possible to forward inquiries or questions to the Company.



# 1. Kryalos Profile

Kryalos SGR S.p.A. (hereinafter, "Kryalos" or the "SGR" or the "Company") is an **asset management company** enrolled in the Bank of Italy SGR Register. It is subject to the regulations on alternative fund managers. It provides collective management service in the area of real estate and credit funds, as well as real estate advisory services.

Kryalos has been operational since 2005 (formerly under the company name Henderson Global Investors SGR S.p.A.). **Today, the company is ranking among the leading players in the Italian real estate market.** Kryalos is considered a reference for Italian and international institutional operators who wish to make real estate investments in Italy.

Since April 2019 Kryalos has changed its headquarters moving from Brera offices to the exclusive location of Palazzo Cordusio. This building has recently been refurbished and has received a LEED GOLD certification. It offers spaces designed to provide the best conditions for workers. For further information about the Corporation, please visit the SGR's website.



Milan  
Piazza Cordusio, 3

## 1.1

# Our business model

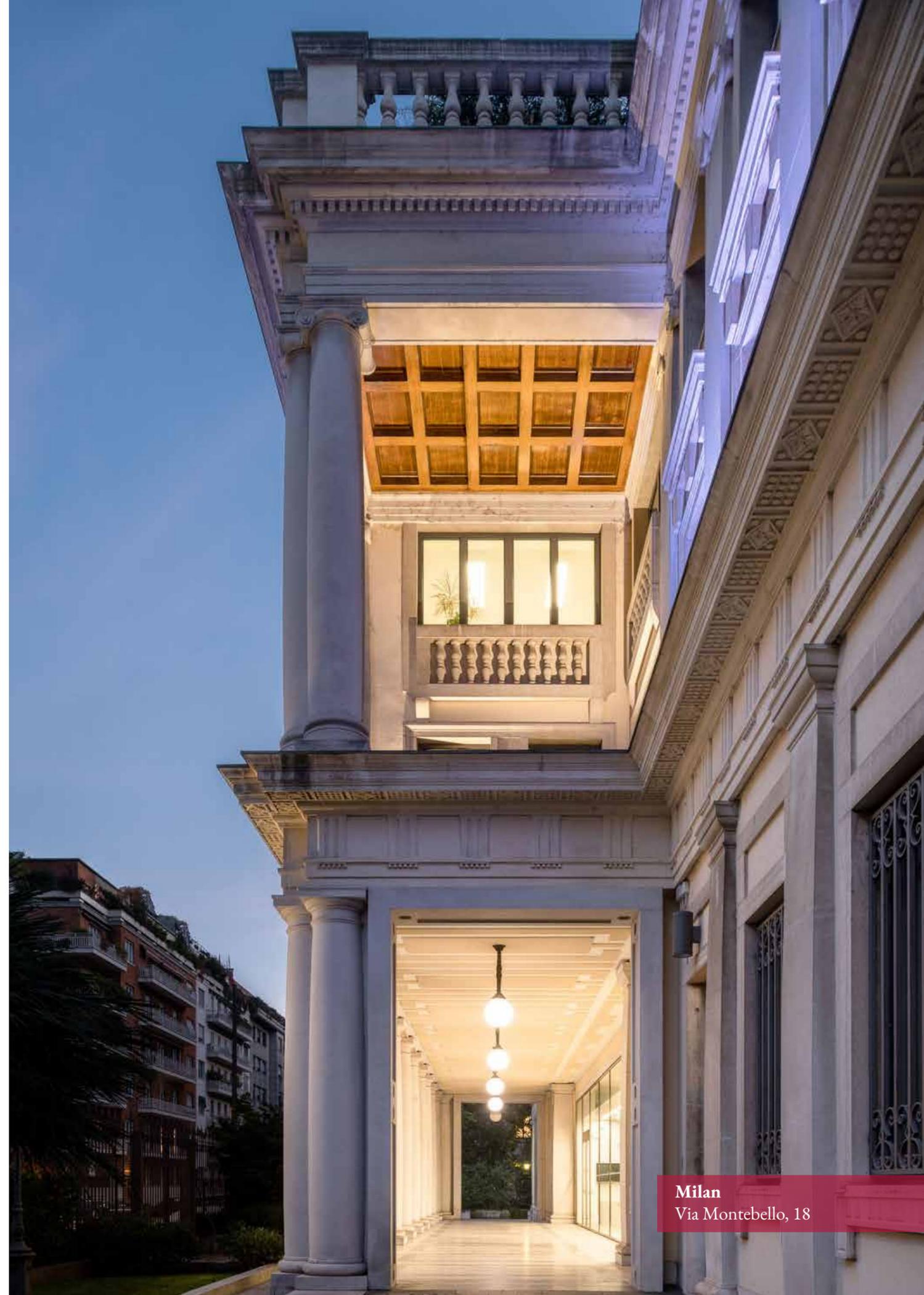
**Kryalos is active in collective asset management through the promotion, establishment and management of alternative investment funds.**

Kryalos manages a wide range of Investment Funds. Among the services offered by Kryalos there are **Transaction Management, Fund Management, Credit Management, Development and Advisory** services.

According to Legislative decree No. 58 of February 24th, 1998, and subsequent amendments and integrations, and in conformity with existing implementation regulations, the Company's focus is the provision of collective investment management services. These are carried out through the establishment, promotion and organization of investment funds. These funds invest in real estate and financial instruments, credits, or other movable assets.

Moreover, the Company places importance on the administration of its relation with participants, as well as the management of assets of its own investment funds and of other institutions.

The Company may also carry out any transaction strictly necessary for the achievement of the corporate purpose. Moreover, in accordance with the regulations in force, issued by the Supervisory and Control Authorities, it may carry out related and instrumental activities, provide consulting services, real estate services, and place the shares of investment funds of its own, or other institutions managed by itself, in Italy or abroad.



## Mission and core values

**The hallmarks of Kryalos are its independence and autonomy within the Italian context.**

In the Italian Real Estate market, it is free to operate in the absence of conflicts of interest and in a completely autonomous manner, both from a decision-making and operational point of view.

Kryalos constantly and directly oversees all **phases of real estate valuation, financing, management and development**, carefully selecting and structuring dedicated levers for new investments and offering diversified strategies to invest in different market areas (offices, logistics, retail, hospitality, residential, technological assets, credits), with **the aim of ensuring stable and lasting performance.**

### Mission

- To be a reference point for **investors, both Italian and international**, willing to operate in the Italian real estate market.
- To consolidate a leadership position within the industry, thanks to the capacity for innovation and flexibility enabled by **an independent approach.**

## Our core values

### Accountability

We are trusted to do or provide what is needed.  
We want people to rely on us.

### Empowerment

We have a positive attitude and seek to encourage everyone to achieve the greatest possible outcomes.  
We enable others to fulfill their potential.

### Respect

We value everyone and treat people with dignity and integrity.  
We care about each other's feeling.

### Teamwork

We know that our best work is not produced by individuals but through collaborating as a team and supporting each other.  
We achieve more when we work together.

## Our Services



Milan  
Via Gattamelata, 34

### Transaction Management

Kryalos follows the relationship with the clients during the acquisition phase, understanding their specific needs and providing **stratigical advisory services for transaction management activities**. It takes care of the finalization of transactions through business planning activities, coordination of the due diligence process, negotiation of purchase and sale agreements and financing agreements.

### Fund Management

Kryalos manages real estate investments through **Alternative Real Estate Investment Funds**, maximizing property value and investment returns. The Company handles client relationships by understanding their needs and supporting them in pursuing their **financial goals through investment strategies** designed to generate value over time.

### Credit Management

The Company has recently introduced a new business line dedicated to **AIFs that manage investments in UTP** loans towards companies mainly in the **SME/Corporate** segment. In this context, Kryalos promotes **debt recovery strategies** aimed at putting debtor companies back on track through **proactive management of their positions focused on corporate restructuring**.

### Development

Kryalos is responsible for **coordinating the process of property development and construction management** for the creation of long-term value for investors and urban context. It also advises on real estate redevelopment projects.

### Advisory

Kryalos is in charge of **defining the best investment strategy for the client**, supporting it in signing contracts, preparing detailed business plans, consulting in all stages of real estate transactions and conducting feasibility studies for repositioning and redevelopment projects.

## 1.2

# Our Governance model

**The organizational structure of the SGR has been implemented in compliance with the directives contained in the Provision issued by the Bank of Italy in 2019 referring to "Regulation implementing Articles 4-undecies and 6, paragraph I, letter b) and c-bis) of the TUF".**

The following paragraphs provide a **summary of the Company's organizational structure**, rules and models of each level that govern the corporate structure. Hence, the functioning of corporate bodies, their composition, interrelation, powers and responsibilities.

More details can be found in the **"Report on Organizational Structure"**, which the Company prepares annually in compliance with the directives contained in the Bank of Italy's Provision dated January 19, 2015 and which extensively describes the Company's corporate governance system. The Report also includes a summary of the Organizational Chart, which is part - together with the other corporate documents, including in particular the corporate procedures - of the so-called **"regulatory body" of Kryalos**. The latter sets out the tasks and areas of responsibility of the functions and organizational units of the Company. The SGR has adopted an **"Internal Regulations"** that comprises a description of its corporate organizational chart and a **"Functional Chart"** describing the set of powers and responsibilities entrusted to the Company's structures and its members, which are functional to its governance and consistent with the guidelines approved by the Board of Directors. The SGR also updated, on December 20, 2022, the **"Regulations of Corporate Bodies"** which:

- draws up and systematizes provisions on the organization of the Company's corporate bodies (i.e., Board of Directors, Chief Executive Officer and Board of Statutory Auditors, as well as Internal Board Committees);
- describes the process related to the periodic self-evaluation of the corporate bodies;
- formalizes informative flows aimed at ensuring the circulation of information among and within the corporate bodies, including the relevant procedures for convening, the frequency of, and attendance at meetings.

The Shareholders' Meeting is governed by the Articles of Association, as well as by applicable laws and regulations.

Moreover, in order to ensure conditions of fairness and transparency in the conduct of business and corporate activities, Kryalos has adopted an **Organizational Model in compliance with Legislative Decree 231/01** and defined the principles and values it is committed to respect within the Code of Conduct (described in the following paragraphs), which forms the basis of the Organization, Management and Control Model under Legislative Decree No. 231 of 2001.

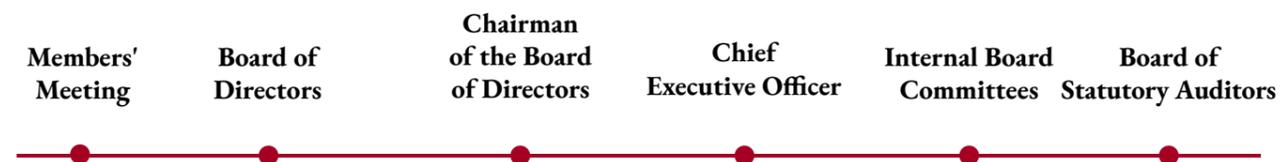


# Corporate Governance

**The Company's Corporate Governance system reflects the strategic policies indicated by the Board of Directors and the resulting internal dynamics related to the SGR's operations.**

In this regard, the company's organizational chart has been structured in order to formalize, within the framework of sound and prudent management, the **containment of risks** and the **segregation of duties between functions**, adopting and/or strengthening internal control mechanisms and safeguards, adequately docu-

menting hierarchical relationships, separateness of functions and division of responsibilities. In accordance with the requirements of laws and regulations on collective asset management and the Articles of Association, SGR's corporate governance falls under the responsibility of the following corporate bodies.



The body with the **function of strategic supervision** of the SGR is the **Board of Directors**. It is vested with the broadest powers for the ordinary and extraordinary management of the Company, without exception. It has the power to perform any act it deems appropriate for the achievement of the corporate purpose, with the exception of what is not reserved, by law or by the Articles of Association, to the Shareholders' Meeting.

Kryalos has identified two ESG referees within the Board of Directors. The **CEO** is the body with the **management function** of the SGR.

In order to promote an efficient system of information and consultation that enables the Board of Directors to better evaluate the issues within its competence, the SGR has established the following **Internal Board Committees**. Determining their composition, terms of reference, powers (advisory, investigative, propositional) and available resources in the "Rules of Corporate Bodies" mentioned above:

- the **Nomination Committee**
- the **Risk Committee**
- the **Compensation Committee**



Kryalos has also provided for the above-mentioned Internal Board Committees to be assigned specific tasks on ESG issues of their respective competence.

In addition, the SGR has established - as part of the real estate investment process of the AIFs it manages - the Asset Allocation Committee, regulated by Procedure "PR 03 - Investments".

The **Board of Statutory Auditors** is vested with **supervisory and control powers**. It monitors compliance with the law and the Articles of Asso-

ciation, compliance with the principles of proper administration and, specifically, the adequacy of the organizational, administrative and accounting structure adopted by the Company and its actual functioning.

On April 14, 2022, the SGR Shareholders' Meeting changed the **composition of the Board of Directors** by increasing the number of Directors from 6 to 7. It proceeded to appoint new members of the Board of Directors and the Board of Statutory Auditors.

## Board of Directors

(in office until fiscal year 2024<sup>1</sup>)

**Chairman and Independent Director<sup>2</sup>**  
Andrea Amadesi

**CEO**  
Paolo Massimiliano Bottelli

**Managing Director**  
Giovanni Scibilia

**Independent Director**  
Arcangelo Magni

**Non-executive Director**  
Domenico Aiello

**Non-executive Director**  
Daniela Maffioletti

**Non-executive Director**  
Emanuela Trentin

## Board of Statutory Auditors

(in office until fiscal year 2024)

**Chairman**  
Marco Salvatore

**Standing Auditor**  
Andrea Ballancin

**Standing Auditor**  
Tiziana Vallone

**Alternate Auditor**  
Carlo Alberto Ogliari

**Alternate Auditor**  
Giovanna Costa

<sup>1</sup> The Board of Directors and the Board of Statutory Auditors will remain in office until the date set for the Shareholders' Meeting to approve the 2024 financial statements.

<sup>2</sup> Pursuant to the Bylaws of Kryalos SGR S.p.A., "independent" is considered to be a director who does not hold operational proxies in the Company, who meets the requirements specified in the provisions in force from time to time or, failing that, who meets the requirements set forth in the Company's Bylaws.

Moreover, in 2022, the SGR further strengthened its ESG governance by appointing a Head of ESG and by establishing an ESG Committee.

Finally, **the structure of the SGR provides for its own organizational composition divided into organizational units called "Departments"**, placed on staff or in line with the CEO or the Heads of Departments (who in turn report to the CEO), which have different purposes and operate in compliance with the adopted internal procedures. Functions allocated to external players are referred to as "Outsourced Services".

Operational Functions have result-oriented purposes and tasks. Staff Functions are entrusted with activities to support line functions. The Control Functions have the purpose, each to the extent of its competence, to ensure sound and prudent management, risk containment and transparent behaviour in the provision of services.

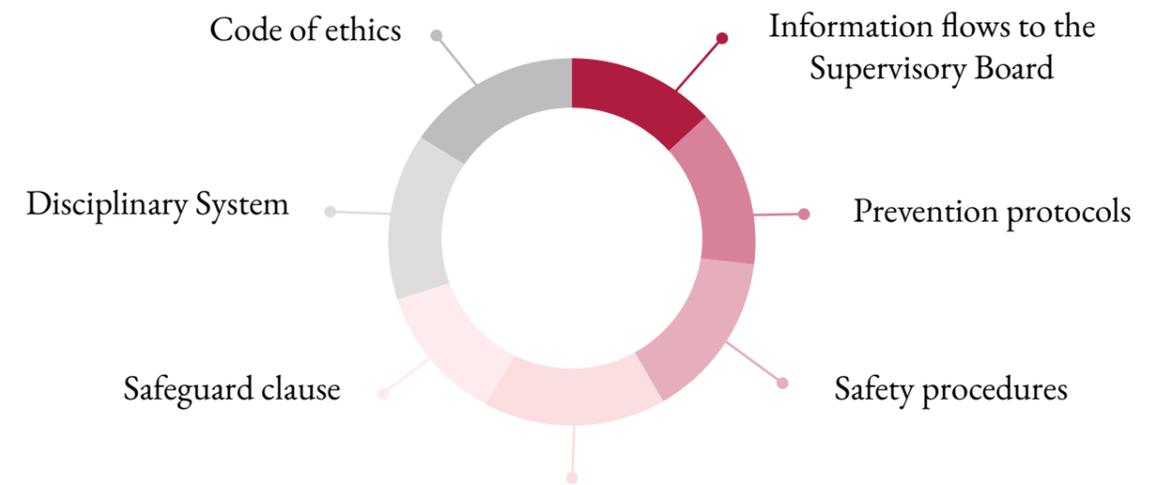
## Organizational Model 231/2001

Kryalos considered consistent with its policy to proceed with the adoption in 2017 and subsequent update of the Organizational Model required by Legislative Decree 231/2001 (last update approved by the SGR Board of Directors on October 27, 2022). The Model adopted by Kryalos aims to represent the rules of the operational and behavioural system that govern the Company's activities, as well as the additional control elements that the Company has adopted to

prevent the different types of crime covered by the Decree.

The Company, with the adoption of the Model, intends to pursue - inter alia - **the objective of the maximum diffusion of the culture of legality** among its employees and among the people who have relations with its business organization.

Parts of the Model are:



Scheme of Responsible Functions for company areas at risk of crime

## Code of Ethics

**Scrupulous attention and significance has been placed on work ethics both on a moral and social side to ensure the preservation and continuity of the community. It ensures this also by prompting Kryalos to define, ever more clearly, the set of values it is inspired by and the reprehensibilities it assumes internally and externally.**

The Code of Ethics of Kryalos SGR establishes **principles, rights, duties, and responsibilities of the Company** towards its stakeholders, to be observed also by all the entities with whom it comes into contact, in relation to the achievement of its objectives.

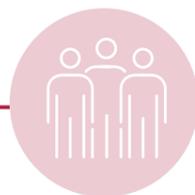
This document constitutes **the basis of the Model 231**. The oversight of it is entrusted to a special Su-

**perisory Board (SB)**, with autonomous powers of initiative and control. The SB, among other things, handles any reports of situations that actually, or potentially, may represent a violation of the Code of Ethics and/or more generally of Legislative Decree 231/2001.

The **Ethical Principles** of reference for Kryalos and its stakeholders are the following:



**Ethics in the management of the company's business and activities**, in terms of legality within the company, integrity towards third parties, transparency and fairness in dealing with the Public Administration, its suppliers and customers, fairness in employee relations, and respect for people's dignity.



**Work ethics, protection and development of employees**, with a view to commitment to improvement, confidentiality in the handling of sensitive data and information, absence of conflicts of interest, safety and protection of health and working conditions, equal opportunities in professional development and resource management.



**Commitment to sustainable development**, protecting the environment and natural resources for future generations, responsibility towards the community, contributing to its economic, social and civil development.



**In compliance with the implementation of these ethical principles, the Company also established a set of organizational and operational rules, that company managers, employees and collaborators are required to comply with.**

These **Rules of Conduct** are divided into the following sections:

- Ethics in the management of company business and activities;
- Work ethics, protection, and enhancement of employees;
- Ethics in communication and in external relations.

In particular, the provisions are aimed at **identifying, preventing, and managing, as far as possible, financial and operational risks and frauds**, and at anti-money laundering activities to contrast illicit activities and criminal and terrorist organizations, as well as hindering the receipt, substitution, or use of money or assets derived from these types of activities.

In addition to **protecting confidential information and personal data**, all employees are required to **comply fully and substantially with environmental legislative requirements**, carefully assessing the environmental consequences of every business choice, both in relation to direct and indirect impacts.

With regard to the **work, protection and development of employees**, the Company pays **special attention to the observance of ethical principles in the hiring process**, as well as in the

**remuneration of staff and corporate collaborators.** In addition, Kryalos takes all appropriate measures to **prevent health and safety risks in the workplace**, assigning tasks to specifically qualified individuals.

In compliance with and in application of the above-mentioned ethical principles and standards of conduct, Kryalos makes the following commitments:

- commitments of the Supervisory Board regarding the implementation and updating of the Code of Ethics and the management of reports of violations and their treatment;
- commitments of the Company regarding the dissemination, application and updating of the Code of Ethics;
- commitments of training and communication, both internal and external, aimed at the diffusion and awareness of the Code of Ethics.

## Whistleblowing System

In compliance with the relevant regulatory framework, which includes Legislative Decree No. 231/2001, Legislative Decree No. 231/2007, as amended by Article 2 of Legislative Decree No. 90/2017 and TUF, Kryalos has adopted a **Whistleblowing system**. This system grants the confidentiality of the identity of the whistleblower and of the reports of non-compliance with laws or regulations, policies, rules or company procedures, facilitating their making, so that the company can intercept deviant behaviour in time to address and correct it.

In this respect, Kryalos **provides an e-mail address and an ad hoc platform** as channels for reports of commissive or omissive behaviours, carried out by anyone in the Company, in relations with the Company itself or on its behalf. These are behaviours that constitute or may constitute or lead to a violation of laws and regulations, of rules established in

the Organizational Model, of principles enshrined in the Code of Ethics, and/or of other provisions and/or internal procedures that can be sanctioned by disciplinary action.

In order to encourage the use of the whistleblowing system and promote the spread of a culture of legality, **its contents are disclosed in a clear, precise and complete manner to all Kryalos personnel**. In addition, the whistleblowing procedure is subject to periodic review to ensure constant alignment with the relevant regulations, as well as in accordance with the Company's concrete operations and experience.

As evidence of Kryalos' commitment to ethical behaviour, with a particular focus on issues of anti-corruption and anti-competitive behaviour, during 2021 no incidents have been reported.



Milan  
Via Montebello, 18

## 1.3

# Risk Management

**Risk management is governed by the company's Risk Management Policy in accordance with Directive 2011/61/EU (the "AIFMD"), which requires managers of Alternative Investment Funds (AIFMs) to have and implement a Policy for the management of risks to which the AIFM and the AIFs it manages are or may be exposed.**

The Policy is reviewed annually. Consistent with the regulatory framework, it outlines the principles and measures adopted by the SGR to identify, assess, manage and monitor on an ongoing basis all relevant risks to which it and the AIFs it manages are, or may be, exposed. To oversee the Risk Management System, of which this Policy is one of the key points, the SGR has established a **permanent Risk Management function** whose tasks also include those set forth in Delegated Regulation 231/2013. The Risk Management function receives from the other corporate functions the information neces-

sary to identify the SGR's risk exposure and types and liaises with them to identify possible actions to contain and mitigate the risk.

The SGR's different types of risks depend mainly on the activities performed, products offered, the regulatory framework or its variations, the organizational structure and procedures the Company has adopted.

**Process Risk**

Arising from malfunctioning of the business organization and operational processes

**Compliance Risk**

Arising from failure to align documentation and/or organization with legal requirements.

**IT Risk**

Arising from operational disruptions, malfunctions or unavailability of systems.



**Employment Risk**

Arising from acts that do not comply with employment, occupational health and safety laws or agreements, payment of compensation for personal injury, or incidents of discrimination or failure to apply equal conditions.

**Strategic Risk**

Arising from an unexpected event or set of conditions that significantly reduce management's ability to implement the defined business strategy.

**Fraud Risk**

Arising from acts in which at least one internal or third party is involved that generate fraud, misappropriation, or aimed at breaching regulations, applicable legislation, or company policies.

The SGR identifies, measures, manages and monitors the operational risks to which it is subject, including those pertaining to the SGR's professional liability. These risks are managed both ex ante, through the adoption of an articulated system of internal regulations, and ex post, through the analysis of the effectiveness of the safeguards put in place to mitigate these risks.

The Risk Management Function prepares a mapping of operational processes and sub-processes. For the assessment and subsequent management of the operational risks, the SGR uses its own internal data on historical losses and in case data need to be integrated, SGR uses scenario analysis and process owner assessments based on verifiable data validated by the Risk Management Function, reflecting the operational framework and system of internal controls.

In detail, the Risk Management Function carries out the following activities:

- (I) analysis of operational procedures and mapping of business processes and sub-processes;
- (II) identification for each business sub-process of the potential risk, the controls in place and the relative degree of adequacy to define a residual operational risk;
- (III) direct interview with the owners of the sub-processes for which, net of the safeguards put in place, a higher risk was found;
- (IV) identification of any critical issues based on the risk identification and assessment activity carried out;
- (V) preparation of an action plan summarizing the

corrective actions deemed necessary to adjust the control systems and mitigate the risks to which the SGR is exposed;

(VI) sharing the findings with the process owner, with whom the action plan is agreed.

As part of the methodology of analysis, risk factors that could generate events with adverse effects (prejudicial events/potential risks) are identified. These can be summarized in the following macro-categories: Process, Compliance, IT, Employment, Strategic and Fraud.

The Risk Management Function reports periodically to the SGR Board of Directors and Board of Auditors on operational risks.

Kryalos also drafts, implements, and keeps up-to-date the **Risk Management Policy** that allows for the identification of all relevant risks to which the SGR and the managed AIFs are exposed or may be exposed, consistent with the current regulatory framework.

The Risk Management Policies enable the identification of all relevant risks to which the SGR and the managed Alternative Investment Funds (AIFs) are or could be exposed, consistent with the current regulatory framework. Within this framework, the Company adopts specific procedures to identify, measure and monitor, on an ongoing basis, actual or potential risks to the AIFs it manages, with reference to environmental, social and governance factors, among others.

## 2. Our commitment to sustainability



Milan  
Viale Fulvio Testi, 280/6

## 2.1

# Our approach to sustainability: a new beginning for Kryalos

**Kryalos' approach to sustainability, in its broadest and most comprehensive sense as environmental, social and governance sustainability (ESG), aims to promote a culture of sustainability and to create shared value for all its stakeholders.**

There are several green initiatives and arrangements that Kryalos has implemented within its office as evidence of its focus on sustainability. To take a further step forward, given the growing relevance of sustainability issues in the national and international context and with a view to meeting the expectations of its stakeholders, the SGR has embarked on a virtuous path to further **integrate ESG issues within its business activities** at all levels of the company.

In line with these new goals, in 2022 Kryalos also further strengthened its **ESG governance** with the appointment of a Head of ESG and the establishment of an ESG Committee and the definition of a **program of actions** to improve its sustainability performance.



## ESG Policy

Adopted by resolution of the Board of Directors on July 28, 2022, in order to define, develop and disseminate a corporate culture on sustainability issues at all levels of the company, to guide its strategic choices with sustainability principles in mind, to consolidate and pursue sustainable development for itself and for that of the stakeholders with whom it interacts and creates strong and lasting relationships over time.

## D&I Policy

Adopted by resolution of the Board of Directors on July 28, 2022, in order to ensure a work environment free from any kind of discrimination, violence or harassment, whether sexual or based on personal, political and cultural diversity, promote an inclusive culture and create all conditions to foster a diverse and innovative environment.

## Policy Responsible Investment

Adopted by resolution of the Board of Directors on December 20, 2022, in order to regulate the integration of ESG criterion the different stages of the investment process of managed AIFs.

## Sustainability Report

In line with the principles of transparency and dialogue with its stakeholders, aimed at illustrating the SGR's sustainability achievements annually.

## Sustainability Plan

That identifies specific sustainability goals and targets of the SGR in line with the Sustainable Development Goals (SDGs).

## Stakeholder Engagement

Through providing ESG-specific training to employees, and planning and conducting surveys carried out by a third party for employee satisfaction.

Disclosure of sustainability in the financial services sector in accordance with Regulation (EU) 2019/2088 – SFDR

Kryalos SGR, in compliance with Articles 3, 4, and 5 of the EU Regulation 2019/2088 - SFDR on Sustainability Disclosure in the Financial Services Sector, publishes information on its website regarding:

- sustainability risk policies;
- adverse sustainability effects at the subject level;
- remuneration policies with regard to sustainability risk integration.

Kryalos' sustainability disclosure under Regulation (EU) 2019/2088 - SFDR is available on the company website.

2.2

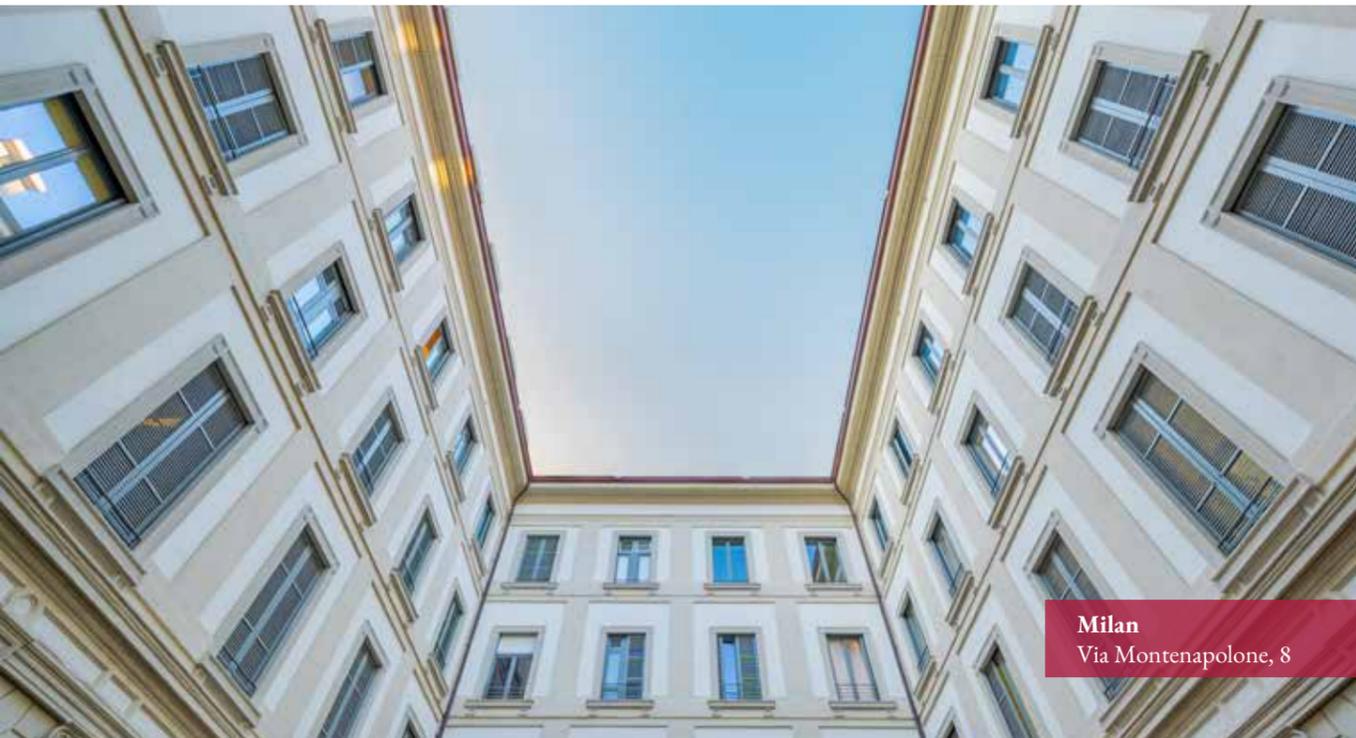
# Stakeholder Mapping

**As also made explicit within its Code of Ethics for the creation of shared and long-term value, Kryalos considers fundamental to build and maintain a solid and lasting relationship with all its stakeholders.**

A relationship based on **continuous dialogue** and **active involvement** is an expression of the Company's responsibility towards the social context within which it interacts.

Through understanding specific needs and priorities, Kryalos can manage the occurrence of poten-

tial critical issues in advance and refine its actions in response to stakeholders' interests and expectations. In this regard, the Company has carried out an initial **mapping exercise of the main stakeholder categories** that influence or are influenced by the Company.



2.3

# Materiality Assessment

**Materiality assessment is the fundamental process for identifying topics that reflect the organization's significant economic, environmental and social impact or that deeply influence the assessments and decisions of its key stakeholders.**

During 2022, for the purpose of identifying these so-called "material" issues to be reported within this document, a materiality assessment was conducted with the involvement of Kryalos Top Management.

For the purposes of the analysis, a list of potential material issues - identified by considering the characterizing aspects and activities of the SGR as well as the main industry trends - were put to a vote through the realization of a workshop by the top management of the main business are-

as and functions. The evaluation was carried out by taking into consideration both the Company's and stakeholders' perspectives, so as to perceive at the same time the influence of the topic on the company's ability to create value and on the decision-making process of its stakeholders.

The result is reflected in the matrix below, which allows us to visually capture stakeholder expectations, Company goals, and priorities among different material issues.

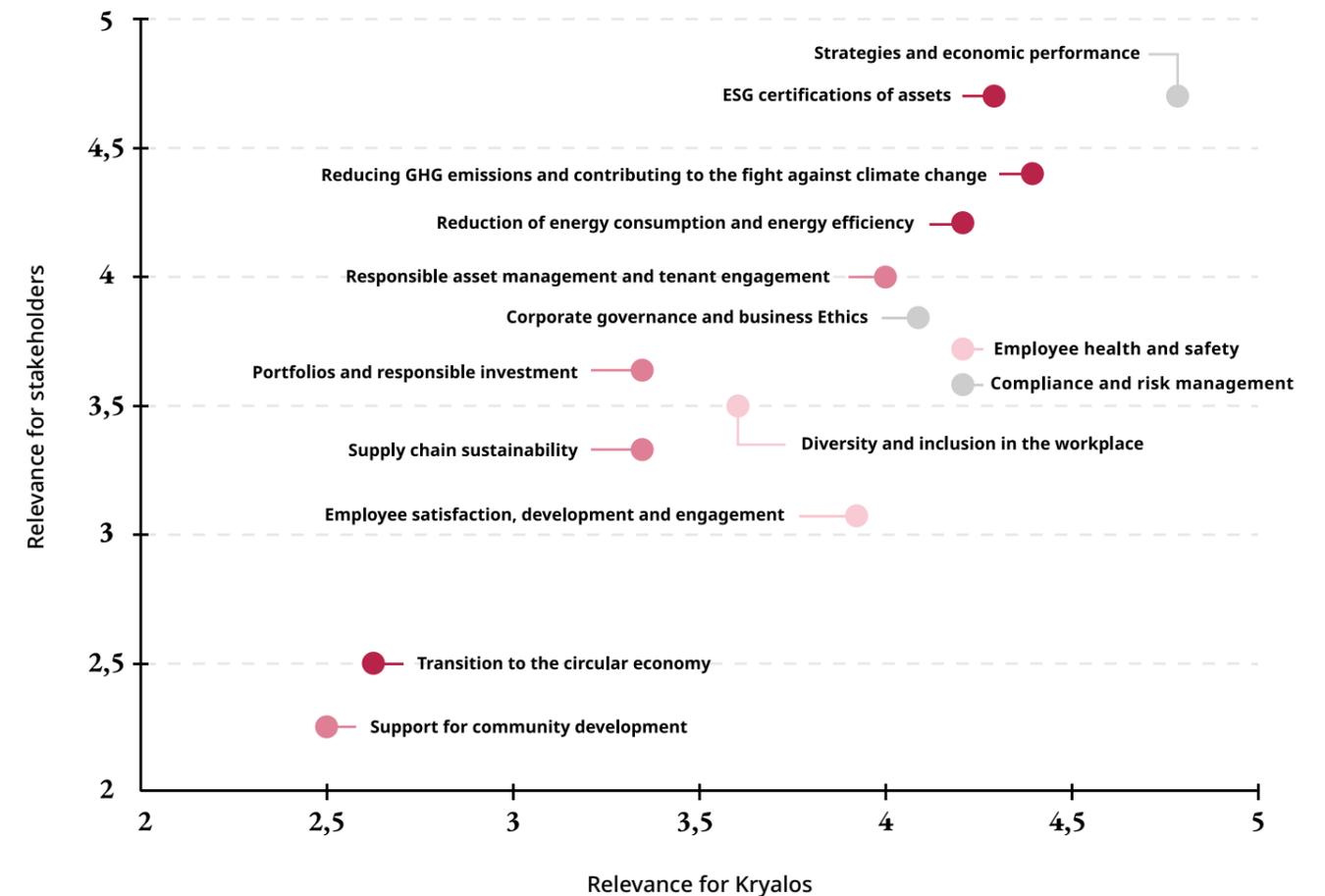
## Materiality matrix

The materiality matrix represents the weighted combination of the **degree of relevance/criticality of topics for the Company** (represented on the horizontal axis) **and for its Stakeholders** (represented on the vertical axis).

The chart shows the issues attributable to the following areas of sustainability:

- Environmental responsibility;
- Social responsibility;
- Responsibility to employees;
- Governance and business responsibility.

The strategies, policies and tools related to the above material issues are reported in depth in this document.



### 3.

# Responsible investment and asset management

Kryalos manages **three types** of investments:

## Core

Assets that require asset management activities to preserve value, generally occupied by tenants with long-term leases that offer stable returns over time.

## Core plus

In line with Core assets these are high quality properties. Unlike Core properties, Core plus assets are occupied by tenants on medium-term leases and require more active asset management activities to increase returns over time.

## Value-add

Vacant assets that often need major redevelopment works to reposition them.

**SGR conducts assessments based on individual investment** strategies through specific due diligence aimed at assessing the risks associated with the potential investment, including technical, environmental, legal, and tax due diligence.

For asset management, SGR has defined GREEN clauses related to the environmental performance of properties (consumption monitoring and data reporting).



## 3.1

## Commitments for the future

In line with national and international sustainability goals, Kryalos believes it is essential to continue to carry out its activities **considering ESG criteria** in its investment choices, in order to steer these choices towards **conscious valuations** capable of creating value in the medium to long term.

In this regard, starting in 2021, the **SGR has embarked on a path to consolidate its commitment and focus on sustainability issues.**



Milan  
Via Principe Amedeo, 5

3.2

# Our funds

As of December 31, 2021, Kryalos manages **55 funds** within which there are **419 assets** divided by 7 different types of uses.



Milan  
Piazzale Loreto - Via Monza, 2

# 4. The accountability in our business relationship



Pavia  
Marzano, Strada Provinciale 128, Km 2

## 4.1

# The attention to selection of business partners and suppliers

**In order to promote a sustainable business strategy, Kryalos' priority is to ensure and promote a responsible and virtuous relationship with business partners like, for example, property and facility managers, design and technical companies, service companies and suppliers.**

For this reason, a series of specific procedures are developed to regulate relations with **business partners** and **suppliers**.

For example, the SGR has implemented procedures to govern the assignment by the SGR itself or in its capacity as management company of the Funds, of professional service assignments of any nature, such as, for example, in the legal, administrative, and tax fields.

In particular, with reference to the process of **awarding contracts, referred to in Art. 26 and/or Title IV of Legislative Decree 81/2008**, Kryalos carefully defines (cfr. "PR 22 - Assignments and Contracts Funds Managed"):

- **the process of assignment projects, works, supplies and services**, especially considering health and safety in the context of activities contracted

out to companies or self-employed workers;

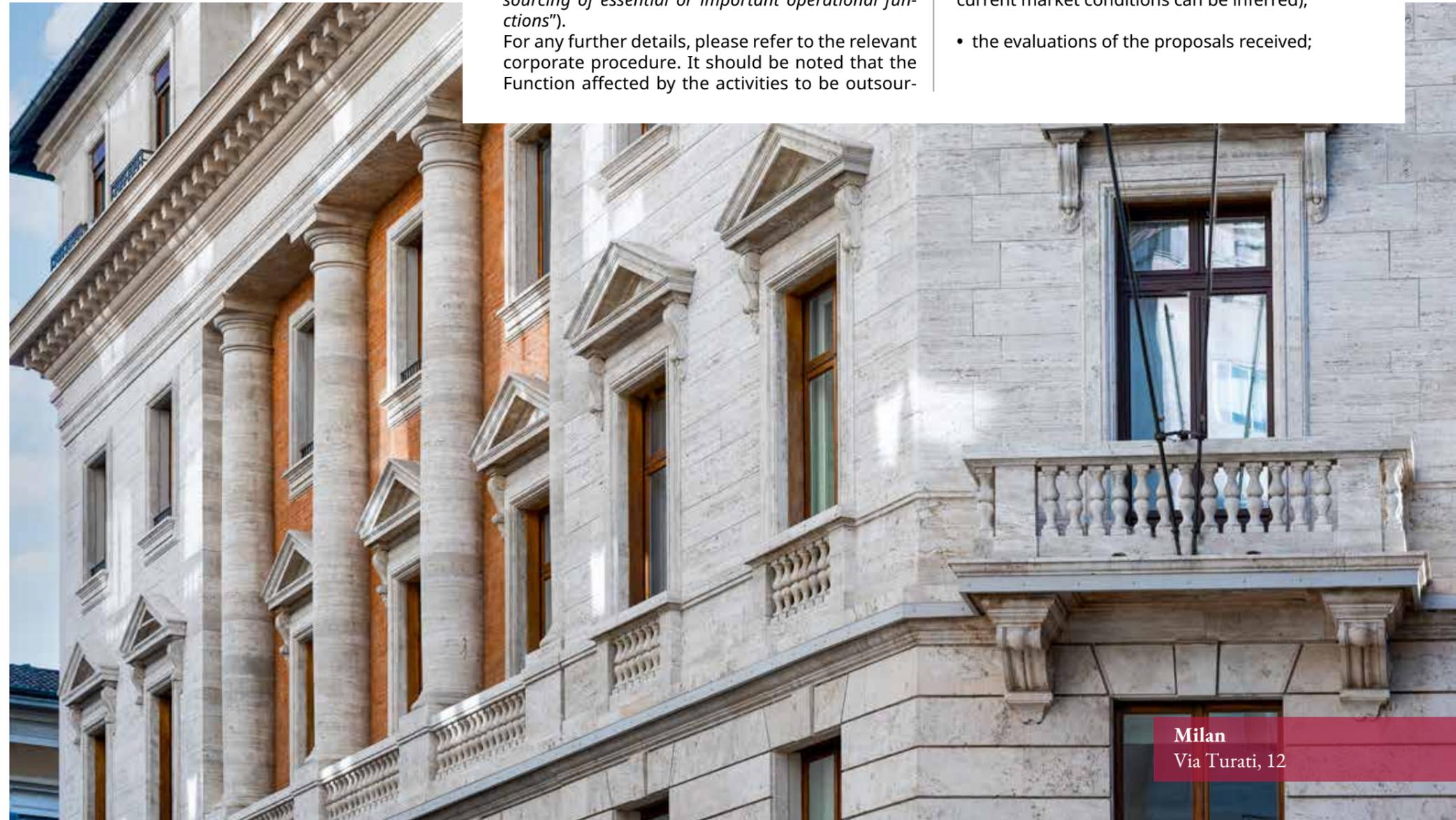
- **the process of entrusting professional assignments** within the scope of the activities of ordinary and extraordinary management of properties and their enhancement and development;

- **the method of selecting suppliers**, while defining the main operational steps and responsibilities of the various actors involved in the process. Furthermore, the Company has formalized certain procedures for the identification, selection, entrusting and ownership of the monitoring of outsourcers to which it delegates essential or important operational business functions, including on behalf of the managed Funds (cfr. "PR 05 - Outsourcing of essential or important operational functions").

For any further details, please refer to the relevant corporate procedure. It should be noted that the Function affected by the activities to be outsour-

ced shall prepare a note, for the purpose of approval by the CEO or the BoD. The note must outline at least the following profiles:

- the essential or important operational function, or the cloud service to be outsourced;
- the proposed compensation for the essential or important operational function, or the cloud service to be outsourced;
- the selection process conducted (any decision not to proceed with a competitive procedure must always be adequately justified, attaching-when possible-a fairness opinion, i.e., a study of market conditions, prepared by a third party, from which current market conditions can be inferred);
- the evaluations of the proposals received;



- any operating methods that are different from the procedure, reporting in detail the underlying reasons;
- in the case of conflicts of interest, the reference case, also reporting evidence of the safeguards put in place (or to be put in place) in compliance with the procedure "PR 02 - Conflicts of Interest";
- the identification of the RCE and ROC;
- in case of outsourcing to cloud service providers, the outcome of the pre-outsourcing analysis and due diligence conducted pursuant to the procedure.

**The SGR has equipped itself with a Supplier Register. The Register intends to adopt defined and suitable selection criteria to ensure the effectiveness of the principles of non-discrimination, equal treatment, proportionality and transparency in the acquisition procedures of works, services and supplies.**

The Register includes professionals selected by the SGR or managed funds in connection with professional service assignments (i.e., legal, administrative, tax, technical and environmental due diligence), as better regulated in procedure "PR 32 - Professional Appointments" to which reference is made, as well as agents who do not constitute essential or important outsourcing (pursuant to procedure "PR 05 - Outsourcing of Essential or Important Operational Functions").

Moreover, without prejudice to any assessment of suspiciousness, at the time of accreditation in the Register, through the tools in use by the Register Manager, anti-money laundering and anti-terrorism checks are carried out as provided for in procedure "PR 16 - Anti-Money Laundering Manual". Finally on this point, it is worth noting that the SGR has also adopted a special procedure (cfr. procedure "PR 02 - Conflicts of interest") which regulates, inter alia, potential cases of **conflict of interest** that

could arise in business relationships, i.e., **professional, economic and commercial relationships**. For example, business relationships are identified to be contractual relationships for the supply of goods and/or services, including those of a professional nature, distribution agreements, reporting agreements, option contracts, guarantees, financing relationships of any kind, leases, advisory contracts, outsourcing relationships, the purchase/sale transactions involving the Fund's assets.

It is crucial for Kryalos to ensure the highest degree of accountability throughout the value chain. Therefore, suppliers are required to sign the Code of Ethics and Model 231. The Supplier Register, which is an integral part of Model 231, describes the process through which the SGR intends to adopt defined selection criteria suitable for ensuring the effectiveness of the principles set out above.

Furthermore, Kryalos SGR's inclination to integrate accountability principles along its supply chain is corroborated by a specific internal procedure (cfr. "PR 02 - Conflicts of Interest"). The purpose of the latter is to regulate the activities and methods of prevention, identification, management and monitoring of conflict-of-interest situations, including potential ones. These may involve the SGR at all stages of the provision of the collective as-

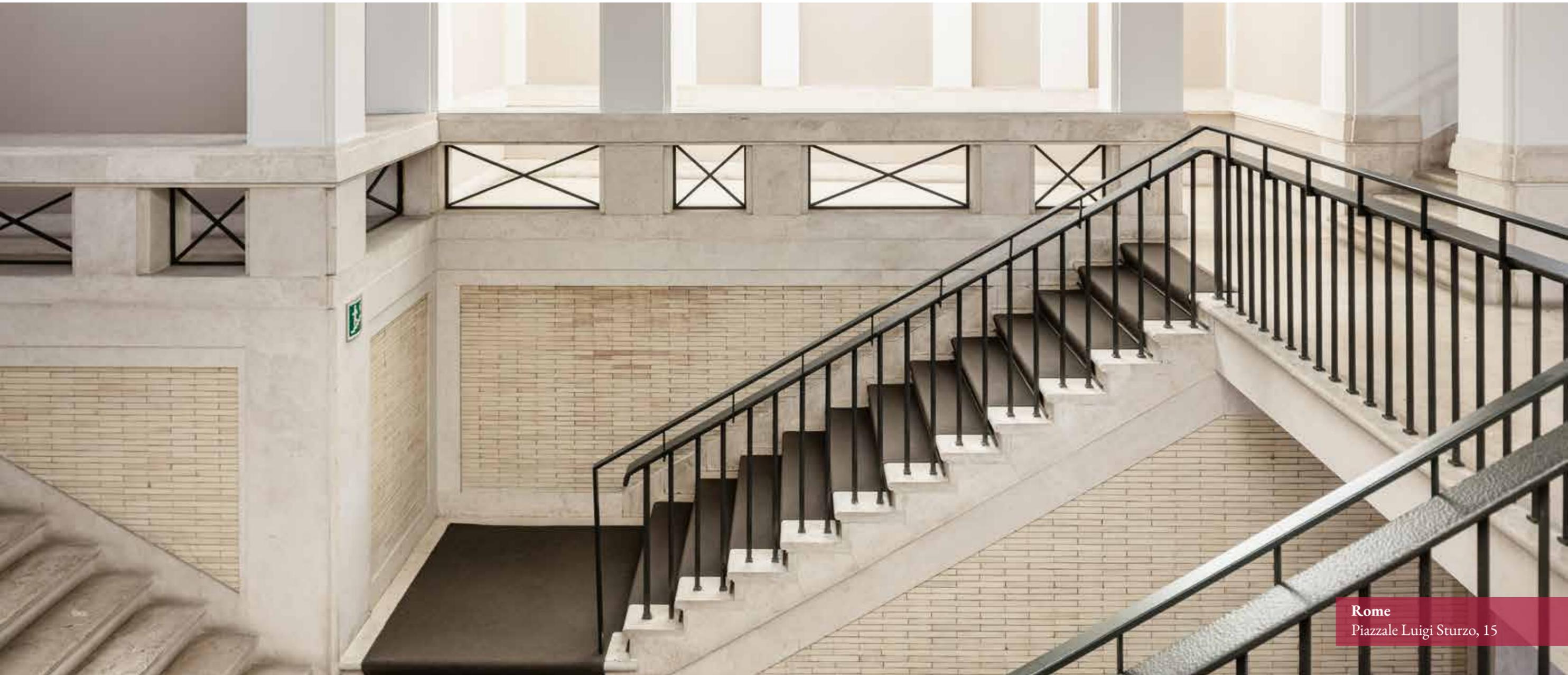
set management service. A goal of this nature is achieved through the definition of organizational and documentary safeguards.

Notwithstanding that the relevant company procedures are an integral part of the Organizational Model - adopted pursuant to Legislative Decree 231/2001 - among the objectives of the Model is to ingrain also in suppliers and consultants, as well as in any other person who may act in the name and

on behalf of Kryalos, respect for the ethical principles, roles, operating methods, procedures and, in general terms, the Model itself.

To this end, consultants and suppliers of the Company are informed of the content of the Model and its annexes, at the time of initiation of the relationship. They commit to perform their services in compliance with the Code of Ethics, the Model

and, more generally, the principles established in Legislative Decree 231/2001, by signing the safeguard clause.



Rome  
Piazzale Luigi Sturzo, 15

# 5. Community development support

Kryalos pays special attention to the impact of the company's activities **on the community and the area** in which it operates. In fact, it implements several initiatives that support the ESG-oriented development of local communities and contribute to **enhancing their well-being and promoting their cohesion and development**. In this sense, during 2021, the Company's efforts were marked by particularly relevant initiatives. They are mainly aimed at the interest of **public administrations, universities, individuals in need and young people**, as summarized in the following paragraphs.

## Donation to "G. and D. De Marchi Foundation"

Like every year before the holiday season, in 2021, Kryalos has chosen to support the "G. and D. De Marchi Foundation" with a donation. Thanks to this donation, the foundation received an electronic format to wish its stakeholders happy holidays. For 40 years, the Foundation has supported children suffering from serious chronic diseases at the De Marchi Pediatric Clinic of the Milan Polytechnic, offering them the best possible care. The relationship between Kryalos and the Foundation has lasted since the Company launch. In 2022, as a result of this, the Company participated at the Milan Marathon Relay by choosing the Foundation itself as a charitable partner and the entire registration fee of each participant was donated to it.

## Donation to Mutual Aid Fund of the Municipality of Milan

In 2021, Kryalos also chose to continue supporting the "Mutual Aid Fund" established by the City of Milan through a donation. This Fund is intended to help in the immediate term those who have been most affected by the spread of the Corona

Virus and subsequently, to support the restart of city activities with more structural interventions to support the reconstruction of the socioeconomic system of the city, with particular attention to small businesses and economic operators. Strongly connected to the city of Milan and the life of the city community, Kryalos had also donated to the Fund in 2020, as evidenced by the letter of thanks received from Mayor Giuseppe Sala.

Over the years, Kryalos has been able to attract and channel important capital from national and international investors into interventions of redevelopment, revitalization and enhancement of areas and buildings located in Milan.

In this way, it has participated in the change of the city and contributed to the creation of a unique model of urban transformation. The Company has always pursued the goal of ecological transformation of the areas of the city in which it operates, of the sustainability, of the quality of life of its community and its overall attractiveness.

## Training and recruiting activities at universities

Regarding training or recruiting activities aimed at the community, Kryalos has been collaborating with LUISS University in Rome for several years. Here, on a yearly basis, Senior Managing Director Alberto Lupi gives a free lecture on the Kryalos business case to the students of the Master's program in Corporate Finance and Banking. In addition, every year Kryalos participates in the Digital Recruiting Date Financial Services & Fintech of Bocconi University in Milan, where students and graduates can meet individually, providing them with an overview of the Company, advertise internship and job offers, and collect applications.



**Milan**  
Melià Hotel Milan Il Duca  
Piazza della Repubblica, 13

## 6. Our people

**For Kryalos, People represent the strategic pillar at the basis of its success: the achievement of the objectives set from year to year depends on their contribution.**

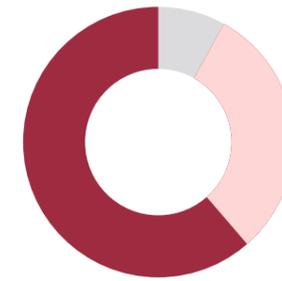
For this reason, the Company has always paid special attention not only to the selection, development, and management of its People, but also relevant care in ensuring their safety and well-being in the workplace.

As of December 31, 2021, Kryalos has **95 workers** including **82 employees**, with an increase of 26% with respect to 2020. External employees include interns, temporary staff, and other collaborators. **The 98% of employees are employed on permanent contracts** and all employees are employed on full-time contracts.

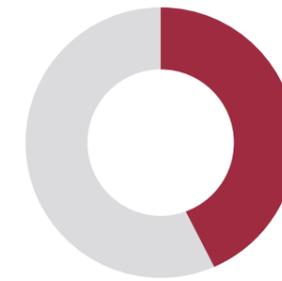
In line with last year, 100% of employees are covered by collective labour agreements.

More than half of the resources are in the white collar professional category, in line with industry trends. With respect to gender composition, the male-female ratio is almost balanced with **43% of employees being women and 35% of the workforce being under the age of 30.**

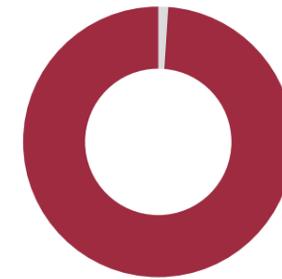
In 2021, Kryalos recorded an incoming turnover of 26%, with 17% incoming turnover of female employees. During 2021, there were only 4 resignations as opposed to 21 new hires, thus recording an outbound turnover of 5%.



**95 employees**  
including **82 on permanent contract**  
with an increase of **26%**  
with respect to 2020



**43%**  
of women employees



**98%**  
of employees **hired on a permanent basis**



**35%**  
of employees **under 30**



6.1

# Satisfaction, wellness, development and engagement of employees

## Attracting talents

Kryalos believes in the centrality of Values and for that reason, since its founding, the Company has taken care to define the Core Values that over time are guiding Kryalos in strengthening its identity and value proposition.

Respect  
for people's  
identity

Respect  
for people's  
diversity

For this reason, the **Talent Acquisition** process is structured in a way to identify resources that are best aligned with the Company's Values. In fact, Kryalos' selection process is aimed at objectively and effectively assessing the candidates' cultural fit with the company's reality. It involves multiple functions and different seniorities and is divided into several steps. The structure of the process not only allows Kryalos to evaluate the candidate, but, at the same time, allows the candidate to have a

complete overview of the realities of the different areas and functions. Each step of the process is dedicated to deepening the candidate's knowledge (for recent graduates), competencies and skills, behaviours, values, and motivation relevant to both the role and the context. The last step of the selection process includes, even for the most junior, a **"one to one" interview with the CEO**, for whom it is a priority to get to know and be known by each person joining the company.

Kryalos also collaborates with **leading Universities** (for instance Bocconi, Politecnico di Milano and Università Cattolica) to search for new talents. Every year, it participates in the Recruiting Date organized by Bocconi University. Involving the most junior resources so that they become true Kryalos Ambassadors in interfacing with the audience of

students and recent graduates potentially interested in the world of Real Estate.

As a sign to the effectiveness of the selection process for younger candidates, **75% of the interns were hired after the internship period.**

Aware of the efforts that a new employee must put in his or her first days in a new company, Kryalos is committed to making sure that each new colleague can feel part of the group as quickly as possible. For this reason, starting in January 2023, Kryalos itself will implement an **onboarding process** structured in cross induction moments, conviviality, and sociability that will involve entrusting the newly hired employee to a dedicated tutor.



Milan  
Piazza San Pietro in Gessate, 2

## Training and development

The pandemic has forced Kryalos to review how it manages its people, as well as their training, development and engagement.

Again in 2021, despite the limitations and complexity of the pandemic situation, Kryalos promoted several remotely managed initiatives with a focus not limited to developing the skills of its employees. In 2021, an average of **15 hours of training** was provided for each employee half of which focused on soft skills.

In light of the important impacts that the pandemic had on people, Kryalos paid special attention to designing and delivering **training sessions in which the skills being developed were managing emotions, listening, welcoming, and empathy**, rethinking the leadership model and also enhancing these skills, in addition to those already required. Indeed, Kryalos believes that today's managers must know how to modulate skills, such

as drive and inspiration, to others more properly related to the emotional sphere, such as empathy, welcoming and listening.

Kryalos has been working on recalibrating the leadership style that the Company would like to promote among people managers. The qualities that the Company is striving to promote include "new" soft skills aimed at supporting and engaging its people. For this reason, starting at the end of 2021, Kryalos has invested in training paths for people managers and in 2022, in line with the previous year, it is delivering **several training modules, both technical and managerial**. The goal is to outline, in the coming months, a training plan that will ensure a path able to accompany each person's professional growth in a fair and effective way through specialization by ladder/seniority.

## Satisfaction and engagement

The pandemic moment was crucial in understanding the importance of top management's closeness to its employees, to strengthen engagement and cohesion among people. For this reason, ever since it was possible to meet physically, Kryalos has been committed to organizing **moments of sharing and team building** extended to the entire corporate population, with the aim of making top management feel close, open to discussion and listening.

In 2022, again with great attention to the engagement of its employees it has organized an **employee survey**. It has been an effective listening tool aimed at capturing the level of satisfaction of its people. At the same time, it will make it possible to detect useful elements to set new improvement actions for the coming year and thus plan future activities. Given the great commitment that Kryalos is placing on ESG issues and the Com-

pany's sensitivity to the well-being of its employees, Kryalos has structured the survey through two specific sections on ESG issues and work-related stress.

Following the results collected from the survey, a series of focus-groups has been organized among employees and relevant line managers. In order to gather further feedback and ideas for improvement in a more informal and collected setting and to define and develop actions aimed at improving employee satisfaction and well-being.



## Career plans and performance management

**The company's performance management system aims to motivate and direct people to continuously achieve an excellence level in their performance.**

Kryalos asks team leaders to ensure that all employees receive at least **two structured feedbacks per year** (mid-year and final review), committing that the dialogue and feedback is open and transparent and the content always objective and contextualized. From the beginning of 2022, the Company has invested time and resources **to train all business managers with respect to how feedback is given** so that it can be effective and constructive. The goal is to create over time an environment in which a 360-degree feedback culture is the norm. Always in order to ensure an organic, sustainable development aimed at constant improvement of its performance, Kryalos is constantly committing to discussing individual contributions and performance in a logic of regular and transparent sharing among the different area managers.

Every year, everyone - except for people to whom a discretionary bonus is allocated - receives and discusses an MBO schedule containing the individual goals assigned to each one of them.

It is Kryalos' priority to value all its people by ensuring fairness and objectivity in their evaluation. Therefore, since 2021, it has established that **promotions and salary reviews** are discussed in calibration moments in which **Senior Managing Directors/Managing Directors** participate giving visibility of the quantitative (MBO) and qualitative (behaviours/values) performance of their employees.

The effect of positive management of corporate organizational development is that the average % of managers moved to executive in 2020 and 2021 is 16.66%.



Rome  
Piazzale Luigi Sturzo, 15

## Welfare

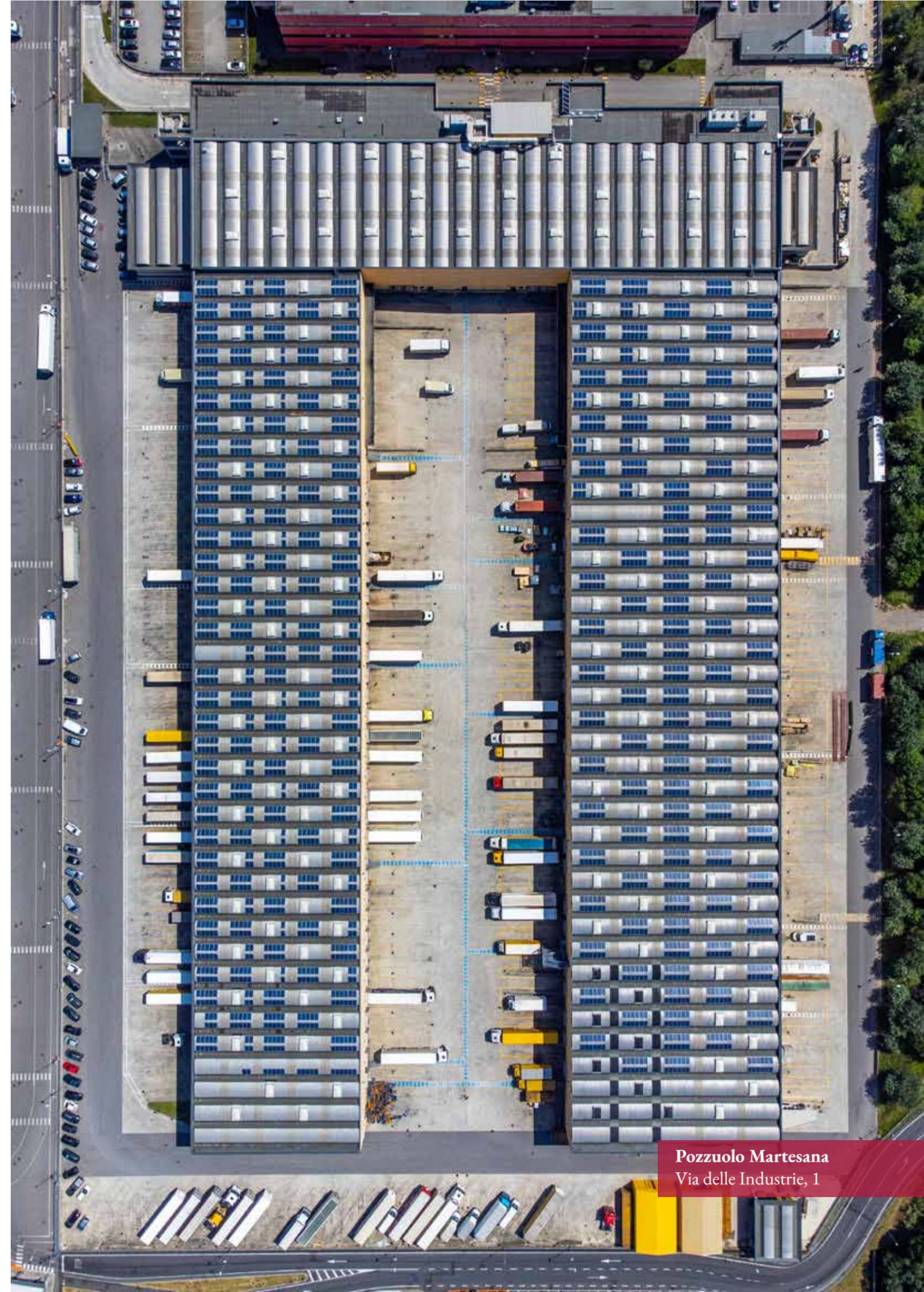
Constant attention to safety, to the physical well-being of its employees and to ensuring an adequate work life balance, has led Kryalos to invest in an health insurance for the benefit of every employee since 2020 that allows refund for multiple healthcare expenses (e.g. surgeries, hospitalizations, specialist visits and therapies) and, with a smaller contribution on his or her part, for his or her families as well.

Throughout 2021, Kryalos has continued to incentivize the use of smart working by the entire corporate population. Looking ahead to people's return to the office, it made concrete efforts to ensure a work environment that complied with safety regulations and, at the same time, was pleasant and comfortable, so that people would physically return to the workplace peacefully and willingly.

For this reason, the Company invested in renting additional space and furniture to ensure that each person had a dedicated workstation, always in compliance with safety spacing. Aware of the importance of sharing and collaboration - even more after long months of isolation - it was decided to set up outdoor spaces. The spacious office terrace was furnished with tables, sofas, and chairs so that everyone could gather outdoors in safety. With the intention of fostering togetherness and personal well-being, Kryalos created a lounge with comfortable sofas in which monographic volumes on art, design and fashion are available for employees to browse through.

During the pandemic, the company had earmarked an expense allowance for employees to purchase equipment (external monitors, ergonomic chairs, etc.) that could facilitate them to work remotely. In 2021, it continued to offer employees refund for expenses incurred in getting to the office by their own means to avoid having to use public transportation. In addition, a dilated entrance time was maintained to avoid rush-hour crowds.

In early 2022, again with the aim of introducing new family income support tools that can ensure an adequate work life balance, Kryalos introduced the first **corporate welfare system**. The plan is available to all employees of the company and the range of services offered is accessible through a dedicated portal. Kryalos' goal is to make this system consolidated and stable to ensure that employees have a concrete contribution to their expenses. The corporate welfare plan was designed by allocating the same amount equally to the entire corporate population (same amount for executives and non-executives), however, providing a higher amount for employees with children; aware of having a young population in the company (75.9% under 40 years old), Kryalos made this decision because it wants to support employees as young parents and future parents.



## 6.2

## Diversity and inclusion in the workplace

**Diversity & Inclusion are principles underlying both Kryalos' selection process and its development and enhancement.**

Kryalos strongly believes that the heterogeneity of the population must be guaranteed and valued as a strategic element of its success. In the selection process, the Company always strives to present candidate pools balanced between men and women. This allows Kryalos to proudly count, as of 31/12/2021, a population **composed of 43% women, with the desire to reach 50% in the coming year**. Respect for the heterogeneity of the corporate population is also preserved in the development and career paths of its people. The high **presence of women in senior positions (Executives and Managers) reaches 40%**, an increase from previous years. This highlights Kryalos' strong focus on ensuring equality and equal opportunities in career paths without any gender discrimination.

The workforce also shows a **6.6% of employees of foreign nationality**.

The Company believes that principles related to diversity and inclusion contribute to the generation of value and growth in the medium and long-term horizon. In the awareness that it is essential to safeguard the rights and freedoms of every individual,

the Company sets and pursues the **goal of promoting a work environment free from any discrimination** based on personal, political, and cultural diversity. Nonetheless, it also aims to raise the awareness of all employees and collaborators to act in all circumstances with respect, dignity, and fairness toward their interlocutors. In this sense, at the Board of Directors meeting of July 28, 2022, the SGR adopted a **Diversity & Inclusion Policy** to formalize guidelines on diversity and equal opportunity issues.

Kryalos is committed to creating the necessary conditions so that a diverse and innovative workforce can be promoted to allow everyone to express themselves to the fullest to bring their contribution

in terms of the quality of Work and added value. Kryalos fully supports criteria that ensure the professional development and management of employees according to the principle of equal opportunity. It promotes gender diversity in top positions and within the workforce, as well. Consistently, it promotes the principle of inclusiveness as a strength, not forgetting to foster an accessible and inclusive work environment.

On the 31th December, 2021 the Company had complied with the existing rules and was in compliance with the provisions regarding the introduction of personnel belonging to protected categories (disabled, Law 68/99 and Art. 18 Law 68/99).



**Foiano della Chiana (Arezzo)**  
Valdichiana Outlet Village

## 6.3

# Health and safety in the workplace

**The protection of its workers' health and safety has always been the focus of Kryalos.**

In this sense, within the framework of the Organization, Management and Control Model, a specific chapter has been drafted regarding the **prevention of crimes related to health and safety at work**. This model identifies the sensitive processes and actions implemented by the organization with reference to the provisions of Article 30 of Legislative Decree 81/08, as amended.

For this purpose, specific organizational procedures have been defined with respect to the chapters of art. 30. A table identifying the areas of activity potentially at risk, risk management and control activities, reference procedures and documentation has been established.

The risk assessment process is overseen by the RSPP - a qualified professional from outside the organization - and approved by the Employer. Specifically, a procedure called "**Criteria for hazard identification and risk assessment**" has been defined. In this assessment, the operating procedures, criteria for risk assessment, how the assessment is verified and updated, and how changes and modifications are managed, are set out.

A **Competent Doctor (CD)** has been designated within the organization and has defined the He-

alth Surveillance Protocol to which workers are subjected. A specific Procedure of "Management of Health Surveillance Activity" has been developed. It defines how preventive and periodic medical examinations are carried out and how the CD determines fitness for the job. The physician's responsibilities for devising worker information and training are also identified.

Workers' participation and consultation in the development, implementation and evaluation of the occupational health and safety management system is carried out through the activities of the **Workers' Safety Representative**. The latter participates in the activities carried out on safety by the RSPP and attends the periodic safety meeting pursuant to Art. 35 of Legislative Decree 81/08. On this matter, the specific Procedure "**Communication, Participation and Consultation on occupational safety and health (OSH)**" has been defined, in which the criteria and methods related to these activities carried out by Kryalos are indicated.

Under the responsibility of the RSPP and the HR department and the approval of the DL workers' educational and training activities are carried out. These activities concern the interventions provi-



Milan  
Via Cavallotti, 14 - Via Verziere, 11

ded for under the State-Regions Agreement and the specific activities identified in relation to the outcomes of the Risk Assessment. The specific Procedure "**Management of Training and Information**" has been established. It describes the criteria, how needs and resources are identified, the definition of objectives and the identification of the training course to which workers in the organization are subjected.

The Human Resources office records all interventions carried out and manages the planning of scheduled interventions.

From January 1, 2020, an **employee health plan** was established. Replacing CCNL for white collar and middle management, and supplementary for managers, it is active with automatic annual renewal unless terminated by the parties. On May

5, 2022, an agreement was signed with employees to implement a corporate welfare plan active from May 16, 2022 and in effect until December 31, 2023. Through the jointly platform, an amount of €2,000 - for employees with children it amounts to €2,500 - was made available to each employee to spend on goods and services.

As noted above, the practices adopted to mitigate adverse effects on work safety have been defined in accordance with Legislative Decree 231/2001 through the implementation of the provisions of Art. 30 of Legislative Decree 81/08. In particular, periodic audits are conducted to verify the proper implementation of OSH procedures. In addition, the specific **Procedure "Supervision of compliance with procedures"** has been defined. It states criteria for conducting audits on OSH technical standards, risk assessment, emergency and first

aid management, procurement management, health surveillance management, and worker information and training.

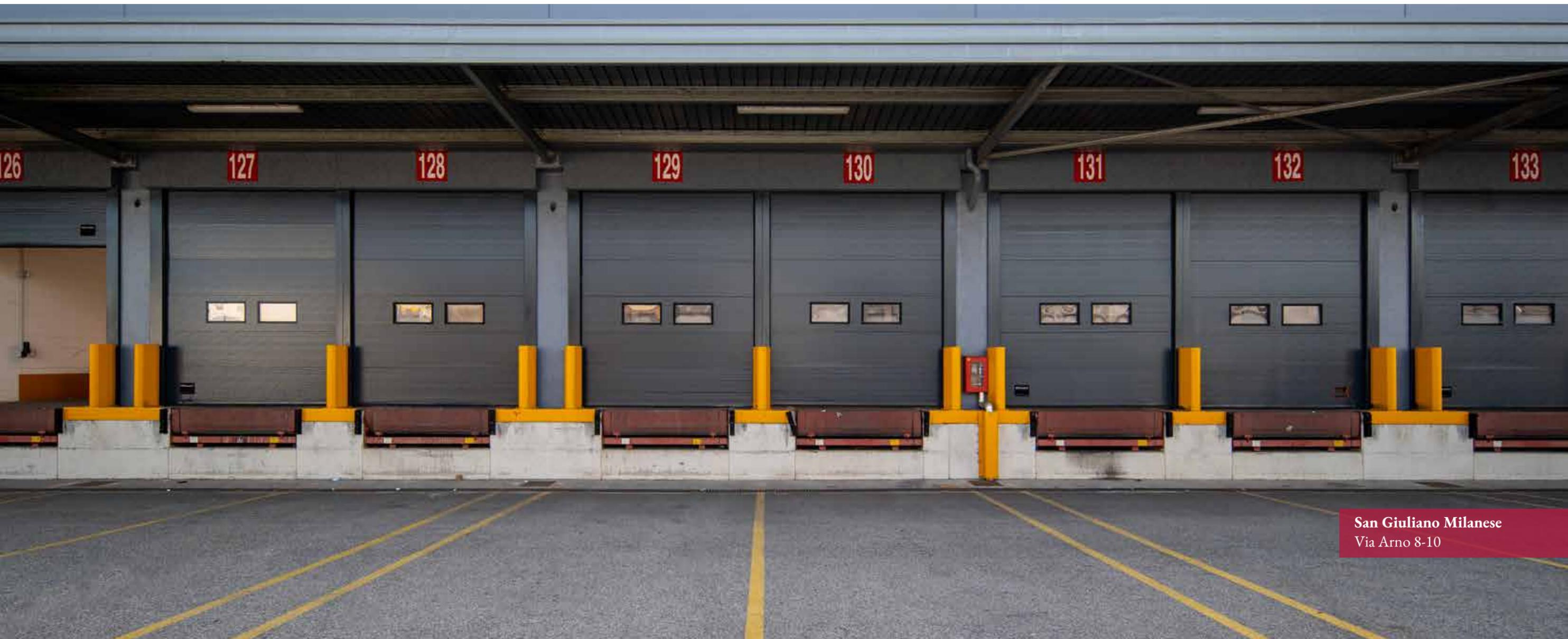
Regarding occupational injuries and accidents, a specific procedure inherent to their management has been defined. It pinpoints the behaviours to be followed in case of an accidental event and how the analysis of events is carried out to implement preventive and corrective actions in order to activate the improvement process. Additional significant actions are implemented as part of OSH management and risk prevention and protection:

- Establishment of an **emergency plan** related to the company headquarters, in which all possible emergency scenarios are identified. The consequent actions to be implemented are defined and the workers in charge of emergency management are identified and undergo specific training. On an

annual basis, evacuation and emergency management tests are conducted under the responsibility of the RSPP. The tests are expected to be formalized through the preparation of the specific report.

- In order to ensure the compliance of technical standards regarding workplaces and premises, general facilities, electrical systems, fire-fighting systems, workplaces and equipment, the specific Procedure "Verification of Technical Standards" is established. It sets out how verifications and checks conducted are planned and recorded.

No occupational accidents occurred during 2021.



# 7. Environmental sustainability



Milan  
Via Gattamelata, 34

7.1

# Energy efficiency and emissions abatement

**As evidence of the attention related to the environmental impacts attributable to its activities, Kryalos is committed to responsible investment and sustainable asset management. Kryalos additionally invests in environmental, social and governance assets (ESG).**

In this regard, as described in the previous paragraphs, the SGR carries out building upgrading activities in order to improve energy efficiency performance and reduce emissions associated with them.

In addition, consumption, as well as the environmental impact of these, are monitored by the Company, both in terms of the direct impacts associated with its own activities and the indirect impacts of the Funds and the properties it manages.



## Kryalos' consumption

Kryalos' energy consumption is mainly due to the supply of electricity for activities in the offices -associated with the operation of equipment and lighting- and partially due to the consumption of the company car fleet. The energy consumption of Kryalos related to 2021 is shown in the table below.

**Energy consumed within the organization (2021)**

Energy Source	Value in GJ
Fuels from non-renewable energy source	not available
Fuels from renewable energy source	not available
Electric energy	270
Purchased from renewable and certified sources	-
Purchased from non-renewable energy source	270

### Kryalos' approach to environmental management

- Integrated BMS system;
- BNP consumption monitoring (property manager of 80% of funds);
- Environmental due diligence on the acquisition process;
- Green clauses in new leases.

Kryalos sets up an integrated BMS (Building Management System) for the integrated management of all technological functions of workspaces. They include systems for access control, security, fire detection, lighting, intelligent elevators and air con-

ditioning. This enables the company to optimize the energy consumption of its spaces and manage energy resources appropriately.

In managing its real estate assets, Kryalos has chosen to rely on different Property Managers. Through this service, Kryalos has the ability to monitor in real time, through an online platform, its real estate funds, the consumption of its properties, energy, electricity, gas and water, and the emissions associated with them. In this way, it is able to constantly have insight into the indirect impact of its business.

## Kryalos' emissions

To monitor its environmental impact and implement initiatives aimed at mitigating it, Kryalos is committed to quantifying greenhouse gas emissions associated directly or indirectly with its activities by monitoring and reporting its direct (Scope 1) and indirect (Scope 2) emissions in this Report.

Regarding indirect emissions, i.e. resulting from the consumption of purchased electricity, there are two calculation methods: using the Market-based (Scope 2) calculation method, emissions in 2021 are 34,383 tCO<sub>2</sub>e. Using Location-based (Scope 2) calculation, they stand at 19,461 tCO<sub>2</sub> in 2021.

### Direct and indirect emissions of GHG (Scope 1 and Scope 2)<sup>3</sup> (2021)

Type of emission	Value in tCO <sub>2</sub>
Scope 1 - Direct emissions	-
Scope 2 - Indirect emissions (location based)	19.461
Scope 2 - Indirect emissions (market based)	34.383
<b>Scope 1 e Scope 2 (location based)</b>	<b>19.461</b>
<b>Scope 1 e Scope 2 (market based)</b>	<b>34.383</b>

<sup>3</sup> For the calculation of indirect GHG emissions (Scope 2) Location-Based method of data for fiscal year 2021, emission factors published by ISPRA (2021) were used.  
For the calculation of indirect GHG emissions (Scope 2) Market-Based method of data for fiscal year 2021, the residual mix emission factors published by Association of Issuing Bodies (AIB 2021) were used.



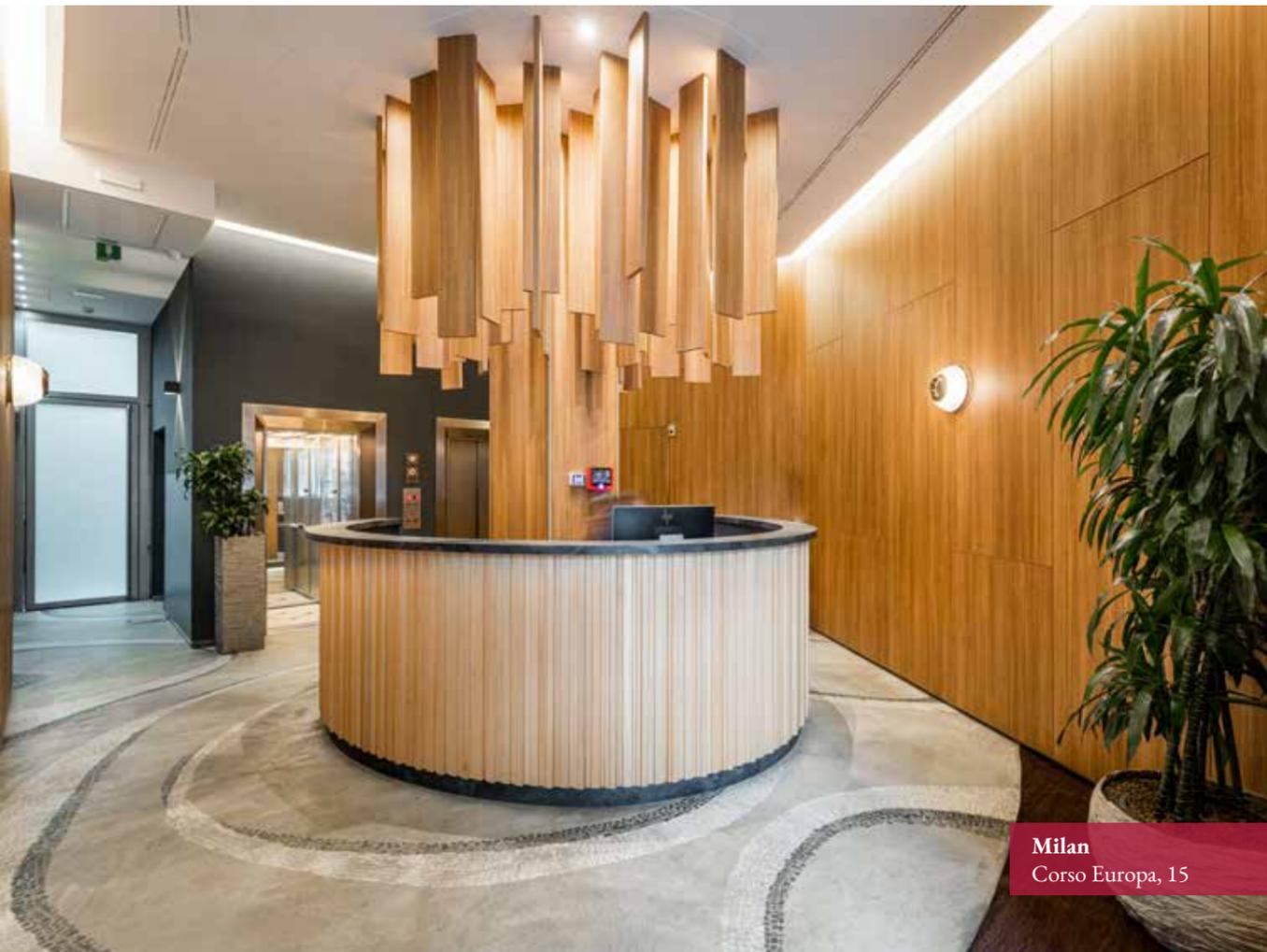
Milan  
Via Verdi, 2

## 7.2

# Circular economy

In line with the path undertaken to reduce the impacts attributable to SGR, Kryalos has implemented several actions for conducting a resource-efficient business by applying circularity criteria in office management. These activities relate in particular

to sustainable waste management, as well as the introduction of sustainability principles in purchasing procedures. Below are the main actions carried out during 2021.



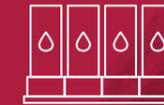
Milan  
Corso Europa, 15

## Responsible waste management



### Separate Waste Collection

Within its own premises, Kryalos constantly strives to promote separate waste collection. The waste produced in its offices is properly disposed of by the cleaning company that Kryalos relies on. To facilitate its work, Kryalos itself provides special containers for separate waste collection, widely distributed throughout the company's premises. To ensure that the process of collecting and proper disposal of waste can take place properly. Among the measures taken in 2021, the Company removed the bins adjoining the workstations to minimize the likelihood of different waste being thrown inside the same container.



### Toner disposal

Toners from printers within Kryalos' offices are collected in special containers that the Company itself purchases from a stationery supplier that is particularly attentive to the environmental impact of its products. The moment the container is saturated, Kryalos makes sure that this supplier organizes the taking of the container and then takes care of the disposal of the toners, issuing them a certificate of final destination for material recovery and recycling. In fact, Kryalos timely receives the waste form from the company recovering the waste, which marks the destination towards a virtuous recovery/recycling cycle.



### Pod recycling

The coffee machines that Kryalos provides to its employees are on loan with a partner company of Nespresso. In line with the company's contribution to a circular economy, starting at the end of 2021, Kryalos will ensure that used pods are collected weekly by the cleaning company that takes care of its offices and returned personally to the Nespresso store in Liberty Square so that they can be recycled.

## Responsible resource use

### "Plastic free" initiatives

During 2021, Kryalos became almost totally "plastic free", committing wherever possible to eliminate the purchase and use of plastic within its offices.

Accordingly, the Company has discontinued any acquisition of plastic water bottles. In order to continue to make water and coffee available to its employees, the Company has installed special water

purification facilities within its premises, thereby abolishing the use of plastic. In addition, as proof of Kryalos' focus on sustainability, coffee and beverage cups used are exclusively made of compostable materials. So are plates, cutlery, napkins and any utensils made available to employees for lunch or coffee breaks.

### "Paperless" initiatives

When purchasing stationery materials, Kryalos is committed to sourcing products derived from recycled materials whenever possible. In particular, it relies on suppliers who offer a wide range of more environmentally conscious and environmentally sustainable choices.

As evidence of Kryalos' commitment to these issues, the types of paper it purchases hold EU Eco-label certification.

In recent years, the Company has also introduced several preventive measures aimed at reducing paper consumption: Kryalos has activated digital signatures, aimed at optimizing the operational flow and reducing the printing of documents on paper;

For confidentiality reasons, the Company has activated a more structured procedure for the printing process. It requires the entry of a code to be able to pick up printed documents, indirectly inducing employees to reduce their quantity.

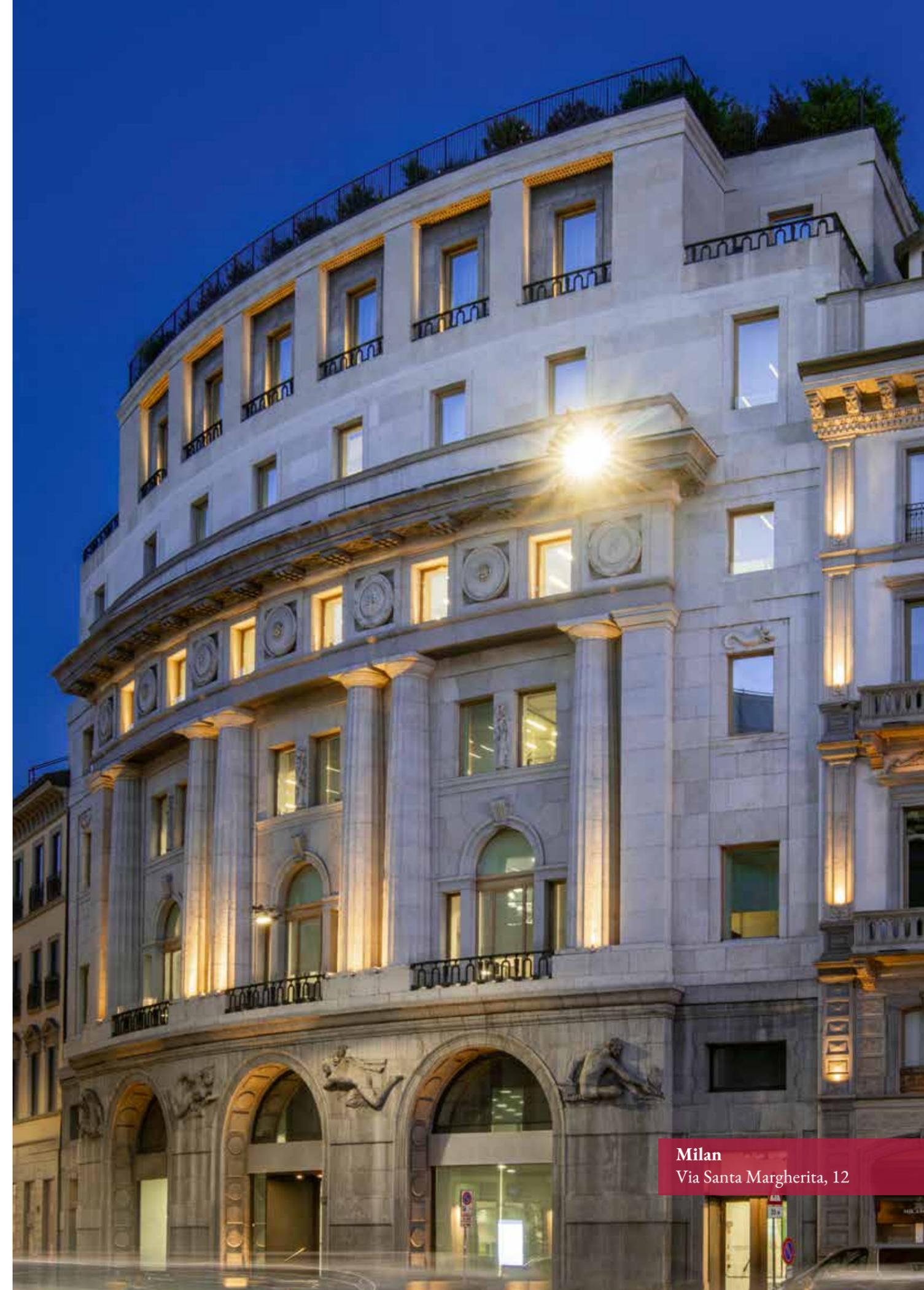
Kryalos purchased iPads to replace paper documents during Board meetings, pushing toward digital consultation of documents.

The Company installed a video conference system within the boardroom of the headquarters. This gives the opportunity to share appropriate documents via a monitor, without the need to have a hard copy for each individual.

### Phone booth project

In the early months of 2022, Kryalos launched an initiative to introduce innovative, modular systems within its offices that allow workspaces to be segmented for greater privacy and security. This way, the workstations dampen noise, allowing employees engaged in phone calls not to necessarily leave the room they are in. This results in a time and efficiency advantage to work environments while increasing the comfort of collective spaces.

The choice of supplier for the construction of these workstations fell on one that uses materials with a low environmental impact. In fact, part of the material used in their construction is completely recycled. Specifically, it is recycled plastic, wood and recycled materials for sound-absorbing walls.



Milan  
Via Santa Margherita, 12

# 8. ESG Certifications from our portfolio

Kryalos pays attention not only to the direct impacts of its business but also to the indirect impacts caused by the properties and assets it manages.

As of December 31, 2021, the assets managed by Kryalos hold 10 LEED certifications, including 4 Platinum and 5 Gold, and 11 BREEAM certifications, including 5 Very Good.

10 LEED®  
Certification

11 BREEAM®  
Certification



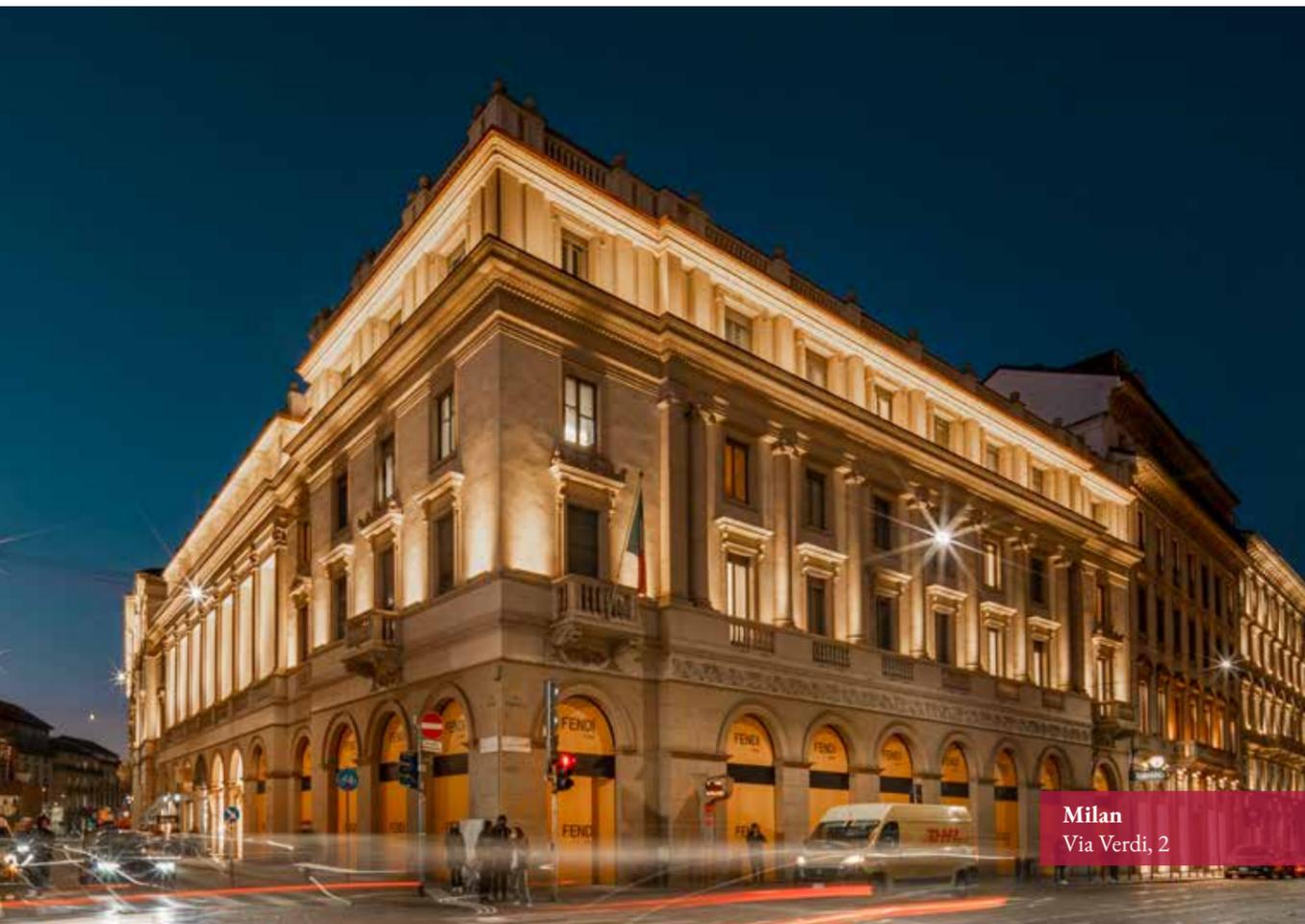
Rome  
W Rome  
Via Liguria, 26-36

## LEED Certification

LEED® is a voluntary certification program that can be applied to any type of building (whether commercial or residential). It covers the entire life cycle of the building itself, from design to construction. LEED promotes a sustainability-oriented approach by recognizing building performance in key areas. Such as saving energy and water, reducing CO2 emissions, improving the ecological quality of interiors, materials and resources used, and design and site selection. Developed by the U.S. Green Building Council (USGBC), the system is based on awarding 'credits' for each requirement. The sum of the credits makes up the 4 levels of certification: basic, silver, gold, platinum.

## BREEAM Certification

The BREEAM (Building Research Establishment Environmental Assessment Method) system is a European standard for best practices in the design, construction, and operation of sustainable buildings. BREEAM encourages designers, clients and all those involved in construction to focus on a new understanding of building based on low environmental impact while minimizing energy requirements. The system is based on a simple and clear rating scale and set against a wide range of energy and environmental categories and criteria. It is structured into different protocols depending on the intended use of the intervention. The sum of the weighted credits determines the building's environmental performance (rating) and the corresponding level of certification: Outstanding, Excellent, Very Good, Good, Pass, Unclassified.



## Performance indicators

### GRI 102-8 Information on employees and other workers

#### Total number of employees broken down by contract type (permanent and fixed-term) and by gender and of outsourced workers

Contract type	As of December 31, 2020			As of December 31, 2021		
	Men	Women	Total	Men	Women	Total
Permanent	33	30	63	46	34	80
Fixed-term	2	-	2	1	1	2
<b>Total employees</b>	<b>35</b>	<b>30</b>	<b>65</b>	<b>47</b>	<b>35</b>	<b>82</b>
Temporary staff	-	-	-	1	-	1
Stage	5	1	6	4	2	6
Other employees	1	1	2	3	3	6
<b>Total outsourced workers</b>	<b>6</b>	<b>2</b>	<b>8</b>	<b>8</b>	<b>5</b>	<b>13</b>
<b>Total workers</b>	<b>41</b>	<b>32</b>	<b>73</b>	<b>55</b>	<b>40</b>	<b>95</b>

#### Total number of employees broken down by type of employment (full-time and part-time) and by gender

Type of employment	As of December 31, 2020			As of December 31, 2021		
	Men	Women	Total	Men	Women	Total
Full-time	35	30	65	47	35	82
Part-time	-	-	-	-	-	-
<b>Total</b>	<b>35</b>	<b>30</b>	<b>65</b>	<b>47</b>	<b>35</b>	<b>82</b>

## GRI 102-41 Collective bargaining agreements

## Percentage of total employees covered by collective bargaining agreements

	As of December 31, 2020	As of December 31, 2021
Total employees	65	82
Number of employees covered	65	82
<b>Percentage value</b>	<b>100%</b>	<b>100%</b>

## GRI 401-1 New hires and staff turnover

## Employees by gender and age group

Gender	2020				2021			
	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total
Men	17	17	1	<b>35</b>	20	25	2	<b>47</b>
Women	7	20	3	<b>30</b>	9	23	3	<b>35</b>
<b>Total</b>	<b>24</b>	<b>37</b>	<b>4</b>	<b>65</b>	<b>29</b>	<b>48</b>	<b>5</b>	<b>82</b>

## Recruitment

Gender	2020				2021			
	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total
Men	10	2	-	<b>12</b>	9	6	-	<b>15</b>
Women	2	3	-	<b>5</b>	4	2	-	<b>6</b>
<b>Total</b>	<b>12</b>	<b>5</b>	<b>-</b>	<b>17</b>	<b>13</b>	<b>8</b>	<b>-</b>	<b>21</b>

## Incoming turnover

Gender	2020				2021			
	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total
Men	59%	12%	-	<b>34%</b>	45%	24%	-	<b>32%</b>
Women	29%	15%	-	<b>17%</b>	44%	9%	-	<b>17%</b>
<b>Total</b>	<b>50%</b>	<b>14%</b>	<b>-</b>	<b>26%</b>	<b>45%</b>	<b>17%</b>	<b>-</b>	<b>26%</b>

## Terminations

Gender	2020				2021			
	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total
Men	4	2	-	<b>6</b>	3	-	-	<b>3</b>
Women	1	1	-	<b>2</b>	1	-	-	<b>1</b>
<b>Total</b>	<b>5</b>	<b>3</b>	<b>-</b>	<b>8</b>	<b>4</b>	<b>-</b>	<b>-</b>	<b>4</b>

## Outgoing turnover

Gender	2020				2021			
	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total
Men	24%	12%	-	<b>17%</b>	15%	-	-	<b>6%</b>
Women	14%	5%	-	<b>7%</b>	11%	-	-	<b>3%</b>
<b>Total</b>	<b>21%</b>	<b>8%</b>	<b>-</b>	<b>12%</b>	<b>14%</b>	<b>-</b>	<b>-</b>	<b>5%</b>

## GRI 401-3 Parental leave

Parental Leave						
Type of parental leave	2020			2021		
	Men	Women	Total	Men	Women	Total
Total number of employees who were eligible for parental leave	2	1	3	-	3	3
Total number of employees who took parental leave	2	1	3	-	3	3
Total number of employees who returned to work during the reporting period after taking parental leave	2	-	2	-	3	3
Total number of employees who returned to work after taking parental leave and who are still employees of the organization in the 12 months after return	2	-	2	-	3	3

## Rate of return to work

Type of parental leave	2020			2021		
	Men	Women	Total	Men	Women	Total
Total number of employees who should have returned to work after parental leave	2	1	3	-	3	3
<b>Rate of return to work</b>	<b>100%</b>	<b>-</b>	<b>67%</b>	<b>-</b>	<b>100%</b>	<b>100%</b>

## Retention rate

Type of parental leave	2020			2021		
	Men	Women	Total	Men	Women	Total
Total number of employees who should have returned to work after parental leave	100%	-	100%	-	100%	100%

## GRI 404-1 Average training hours per year and per employee category

Average hours of training per capita by job category and gender									
Occupational category	2020								
	Men			Women			Total		
	Training hours	Number of employees	Average hours	Training hours	Number of employees	Average hours	Training hours	Number of employees	Average hours
Executives	107	7	15,29	72	4	18,00	179	11	16,27
Middle managers	146	8	18,25	108	6	18,00	254	14	18,14
Clerks	206	20	10,30	228	20	11,40	434	40	10,85
<b>Total</b>	<b>459</b>	<b>35</b>	<b>13,11</b>	<b>408</b>	<b>30</b>	<b>13,60</b>	<b>867</b>	<b>65</b>	<b>13,34</b>

## Average hours of training per person by job category and gender

Occupational category	2021								
	Men			Women			Total		
	Training hours	Number of employees	Average hours	Training hours	Number of employees	Average hours	Training hours	Number of employees	Average hours
Executives	170	9	18,83	94	4	23,50	264	13	20,27
Middle managers	165	9	18,33	143	8	17,88	308	17	18,12
Clerks	511	29	17,62	392	23	17,04	903	52	17,37
<b>Total</b>	<b>846</b>	<b>47</b>	<b>17,99</b>	<b>629</b>	<b>35</b>	<b>17,97</b>	<b>1.475</b>	<b>82</b>	<b>17,98</b>

## Average hours of training per person for outsourced workers

Occupational category	2020								
	Men			Women			Total		
	Training hours	Number of employees	Average hours	Training hours	Number of employees	Average hours	Training hours	Number of employees	Average hours
Temporary staff	-	-	-	-	-	-	-	-	-
Stage	27	5	5,40	6	1	6	33	6	5,50
Other employees	6	1	6,00	6	1	6	12	2	6,00
<b>Total</b>	<b>33</b>	<b>6</b>	<b>5,50</b>	<b>12</b>	<b>2</b>	<b>6</b>	<b>45</b>	<b>8</b>	<b>5,63</b>

## Average hours of training per person for outsourced workers

Occupational category	2021								
	Men			Women			Total		
	Training hours	Number of employees	Average hours	Training hours	Number of employees	Average hours	Training hours	Number of employees	Average hours
Temporary staff	8	1	8,00	-	-	-	8	1	8,00
Stage	43	4	10,75	25	2	12,5	68	6	11,33
Other employees	29	3	9,50	29	3	9,5	57	6	9,50
<b>Total</b>	<b>80</b>	<b>8</b>	<b>9,94</b>	<b>54</b>	<b>5</b>	<b>10,7</b>	<b>133</b>	<b>13</b>	<b>10,23</b>

## GRI 205-2 Communication and training in anti-corruption policies and procedures

## Total number and percentage of employees trained in anti-corruption, broken down by employee category and region

Members of governing bodies	2020			2021		
	Number of members of governing bodies trained in anti-corruption matters	Total number of members of governing bodies	%	Number of members of governing bodies trained in anti-corruption matters	Total number of members of governing bodies	%
Directors/Executives	-	6	-	-	7	-

## Total number and percentage of employees trained in anti-corruption, broken down by employee category and region

Members of governing bodies	2020			2021		
	Number of members of governing bodies trained in anti-corruption matters	Total number of members of governing bodies	%	Number of members of governing bodies trained in anti-corruption matters	Total number of members of governing bodies	%
Executives	11	11	100%	13	13	100%
Middle managers	14	14	100%	17	17	100%
Clerks	40	40	100%	52	52	100%
<b>Total</b>	<b>65</b>	<b>65</b>	<b>100%</b>	<b>82</b>	<b>82</b>	<b>100%</b>

## GRI 412-2 Formazione dei dipendenti sulle politiche o le procedure sui diritti umani

## Training on human rights policies or procedures regarding that are relevant to activities

	Number of employees trained	Number of total employees	%	Number of employees trained	Number of total employees	%
Total number of training hours	-	-	-	-	-	-
Employees trained	-	65	-	-	82	-

**GRI 404-3 Percentage of employees who receive periodic evaluation of performance and professional development**
**Total percentage of employees by gender and employee category who received periodic performance and professional development appraisal**

Occupational category	2020								
	Men			Women			Total		
	Number of employees who received an evaluation	Number of employees	%	Number of employees who received an evaluation	Number of employees	%	Number of employees who received an evaluation	Number of employees	%
Executives	7	7	100%	4	4	100%	11	11	100%
Middle managers	7	8	88%	6	6	100%	13	14	93%
Clerks	16	20	80%	16	20	80%	32	40	80%
<b>Total</b>	<b>30</b>	<b>35</b>	<b>86%</b>	<b>26</b>	<b>30</b>	<b>87%</b>	<b>56</b>	<b>65</b>	<b>86%</b>

**Total percentage of employees by gender and employee category who received periodic performance and professional development appraisal**

Occupational category	2021								
	Men			Women			Total		
	Number of employees who received an evaluation	Number of employees	%	Number of employees who received an evaluation	Number of employees	%	Number of employees who received an evaluation	Number of employees	%
Executives	9	9	100%	4	4	100%	13	13	100%
Middle managers	7	9	78%	7	8	88%	14	17	82%
Clerks	22	29	76%	19	23	83%	41	52	79%
<b>Total</b>	<b>38</b>	<b>47</b>	<b>86%</b>	<b>30</b>	<b>35</b>	<b>86%</b>	<b>68</b>	<b>82</b>	<b>83%</b>

**GRI 405-1 Diversity of government bodies and employees**
**Diversity of governing bodies by gender and age group**

Age groups	2020					
	Men		Women		Total	
	Number employees	%	Number employees	%	Number employees	%
< 30	-	-	-	-	-	0%
30-51	1	17%	-	-	1	17%
> 51	5	83%	-	-	5	83%
<b>Total</b>	<b>6</b>	<b>100%</b>	<b>-</b>	<b>-</b>	<b>6</b>	<b>100%</b>

**Diversity of governing bodies by gender and age group**

Age groups	2021					
	Men		Women		Total	
	Number employees	%	Number employees	%	Number employees	%
< 30	-	-	-	-	-	-
30-51	-	-	1	14%	1	14%
> 51	6	86%	-	-	6	86%
<b>Total</b>	<b>6</b>	<b>86%</b>	<b>1</b>	<b>14%</b>	<b>7</b>	<b>100%</b>

## Employees divided by job category, gender and age group

Job category and gender	2020							
	< 30	%	30-50	%	> 50	%	Total	%
Executives	-	-	8	12%	3	5%	11	17%
Men	-	-	6	9%	1	2%	7	11%
Women	-	-	2	3%	2	3%	4	6%
Middle managers	1	2%	6	9%	-	-	14	22%
Men	1	9%	7	11%	-	-	8	12%
Women	-	-	6	9%	-	-	6	9%
Clerks	23	35%	16	25%	1	2%	40	62%
Men	16	25%	4	6%	-	-	20	31%
Women	7	11%	12	18%	1	2%	20	31%
<b>Total</b>	<b>24</b>	<b>45%</b>	<b>37</b>	<b>57%</b>	<b>4</b>	<b>6%</b>	<b>65</b>	<b>100%</b>
<b>Men</b>	<b>17</b>	<b>34%</b>	<b>17</b>	<b>26%</b>	<b>1</b>	<b>2%</b>	<b>35</b>	<b>54%</b>
<b>Women</b>	<b>7</b>	<b>11%</b>	<b>20</b>	<b>31%</b>	<b>1</b>	<b>5%</b>	<b>30</b>	<b>46%</b>

## Employees divided by job category, gender and age group

Job category and gender	2021							
	< 30	%	30-50	%	> 50	%	Total	%
Executives	-	-	10	12%	3	4%	13	16%
Men	-	-	8	10%	1	1%	9	11%
Women	-	-	2	2%	2	2%	4	5%
Middle managers	1	1%	15	18%	1	1%	17	21%
Men	1	1%	7	9%	1	1%	9	11%
Women	-	-	8	10%	-	-	8	10%
Clerks	28	34%	23	28%	1	1%	52	63%
Men	19	23%	10	12%	-	-	29	35%
Women	9	11%	13	16%	1	1%	23	28%
<b>Total</b>	<b>29</b>	<b>35%</b>	<b>48</b>	<b>59%</b>	<b>5</b>	<b>6%</b>	<b>82</b>	<b>100%</b>
<b>Men</b>	<b>20</b>	<b>24%</b>	<b>25</b>	<b>30%</b>	<b>2</b>	<b>2%</b>	<b>47</b>	<b>57%</b>
<b>Women</b>	<b>9</b>	<b>11%</b>	<b>23</b>	<b>28%</b>	<b>3</b>	<b>4%</b>	<b>35</b>	<b>43%</b>

## Employees in protected categories

Occupational category	2020			2021		
	Men	Women	Total	Men	Women	Total
Executives	-	-	-	-	-	-
Middle managers	-	-	-	-	-	-
Clerks	-	1	1	1	1	2
<b>Total</b>	<b>-</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>2</b>

# GRI Content Index

GRI Standards	Disclosure	Reference in text	Omissions
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<b>GRI 102: GENERAL DISCLOSURE (2016)</b>			
<b>ORGANIZATION PROFILE</b>			
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102-6	Markets served	p. 10-15	
102-7	Size of the organization	p. 8-29	
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102-9	Supply chain	p. 44-51	
<b>STRATEGY</b>			
102-14	Statement from a senior executive	p. 4-5	
102-15	Key impacts, risks and opportunities	p. 26-29	
<b>ETHICS AND INTEGRITY</b>			
102-16	Values, principles, standards and norms of behaviour	p. 16-25	
<b>GOVERNANCE</b>			
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<b>STAKEHOLDER ENGAGEMENT</b>			
102-40	List of stakeholder groups	p. 34-35	
102-41	Collective bargaining agreements	p. 86	
<b>REPORTING PRACTICES</b>			
102-47	List of material topics	p. 36-37	
102-50	Reporting period	p. 6-7	
102-51	Date of the most recent report	This document is the first Sustainability Report.	
102-52	Periodicity of reporting	p. 6-7	
102-53	Contacts to request information regarding the report	p. 6-7	
102-55	GRI Table of Contents	p. 96-100	
102-56	External Assurance	The document is not subject to external assurance.	
<b>TOPIC-SPECIFIC STANDARD</b>			
<b>GRI 205: ANTI-CORRUPTION 2016</b>			
103-1	Explanation of the Material theme and its perimeter	p. 36-37	
103-2	The management mode and its components	p. 16-25	
103-3	Evaluation of the management mode	p. 16-25	
205-2	Training and communication on anti-corruption policies and procedures.	p. 91	
205-3	Established incidents of corruption and actions taken	There were no established incidents of corruption during 2021.	
<b>GRI 206: ANTICOMPETITIVE BEHAVIOUR 2016</b>			
103-1	Explanation of the Material theme and its perimeter	p. 36-37	
103-2	The management mode and its components	p. 10-25	
103-3	Assessment of the management mode	p. 10-25	
206-1	Legal actions for anticompetitive behaviour, antitrust and monopolistic practices.	No legal actions for anticompetitive behaviour, antitrust and monopolistic practices were taken during 2021.	

**GRI 302: ENERGY 2016**

103-1	Explanation of the Material theme and its perimeter	p. 36-37	
103-2	The management mode and its components	p. 74-77	
103-3	Assessment of the management mode	p. 74-77	
302-1	Energy consumed within the organization	p. 75	

**GRI 305: EMISSIONS 2016**

103-1	Explanation of the Material theme and its perimeter	p. 36-37	
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103-3	Assessment of the management mode	p. 74-77	
305-1	Direct GHG emissions (Scope 1)	p. 76	
305-2	Indirect GHG emissions from energy consumption (Scope 2)	p. 76	

**GRI 307: ENVIRONMENTAL COMPLIANCE 2016**

103-1	Explanation of the Material theme and its perimeter	p. 36-37	
103-2	The management mode and its components	p. 72-81	
103-3	Assessment of the management mode	p. 72-81	
307-1	Non-compliance with environmental laws and regulations.	There were no penalties or non-monetary sanctions for non-compliance with environmental laws and regulations during 2021.	

**401: EMPLOYMENT 2016**

103-1	Explanation of the Material theme and its perimeter	p. 36-37	
103-2	The management mode and its components	p. 56-71	
103-3	Assessment of the management mode	p. 56-71	
401-1	New hires and turnover	p. 86-87	

**GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2018**

103-1	Explanation of the Material theme and its perimeter	p. 36-37	
103-2	The management mode and its components	p. 68-71	
103-3	Assessment of the management mode	p. 68-71	
403-1	Occupational health and safety management system	p. 68-71	
403-2	Hazard identification, risk assessment and accident investigation	p. 68-71	
403-3	Occupational health services	p. 68-71	
403-4	Worker participation and consultation and communication about occupational health and safety	p. 68-71	
403-5	Worker training in occupational health and safety	p. 68-71	
403-6	Worker health promotion	p. 68-71	
403-7	Prevention and mitigation of occupational health and safety impacts within business relationships	p. 68-71	
403-9	Workplace accidents	No workplace accidents occurred during 2021	

**GRI 404: TRAINING AND EDUCATION 2016**

103-1	Explanation of the Material theme and its perimeter	p. 36-37	
103-2	The management mode and its components	p. 58-65	
103-3	Assessment of the management mode	p. 58-65	
404-1	Average annual training hours per employee	p. 89-90	
404-3	Percentage of employees who receive periodic evaluation of their performance and professional development	p. 92	

**GRI 405: DIVERSITY AND EQUAL OPPORTUNITY 2016**

103-1	Explanation of the Material theme and its perimeter	p. 36-37	
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103-2	The management mode and its components	p. 66-67	
103-3	Assessment of the management mode	p. 66-67	
405-1	Diversity in governing bodies and among employees	p. 93-95	

**GRI 406: NON-DISCRIMINATION 2016**

103-1	Explanation of the Material theme and its perimeter	p. 36-37	
103-2	The management mode and its components	p. 66-67	
103-3	Assessment of the management mode	p. 66-67	
406-1	Incidents of discrimination and corrective measures taken	There were no established discrimination incidents during 2021.	

**GRI 412: ASSESSMENT OF RESPECT FOR HUMAN RIGHTS 2016**

103-1	Explanation of the Material theme and its perimeter	p. 36-37	
103-2	The management mode and its components	p. 58-65	
103-3	Assessment of the management mode	p. 58-65	
312-2	Worker training on human rights policies and procedures.	p. 91	

**GRI 419: SOCIOECONOMIC COMPLIANCE 2016**

103-1	Explanation of the Material theme and its perimeter	p. 36-37	
103-2	The management mode and its components	p. 44-71	
103-3	Assessment of the management mode	p. 44-71	
406-1	Non-compliance with social and economic laws and regulations	There were no instances of non-compliance with social and economic laws and regulations during 2021.	