

Sustainability Policy

Noval Property R.E.I.C. is committed to addressing societal needs by delivering, through its subsidiaries, products and solutions in a reliable, inclusive, and sustainable manner. In doing so, Noval Property R.E.I.C. through this policy, aims to create shared value for all stakeholders while aligning with European Sustainability Reporting Standards (ESRS) and contributing to the UN Sustainable Development Goals (SDGs). The policy has been developed taking into consideration the interests of key stakeholders of Noval Property R.E.I.C., and applies to all employees, officers, directors, contractors, and agents as well as all entities and subsidiaries controlled by the companies. The policy applies to all operations and business activities, regardless of the country in which the Company operates, as well as its upstream and downstream value chain.

Noval Property R.E.I.C. is dedicated to operating in a way that fosters progress toward the UN Sustainable Development Goals (SDGs), seeking to help preserve the environmental, social, and economic assets essential to society. By embedding sustainability into their operations, strategy, business plans, and operations, Noval Property R.E.I.C. aims to minimize its negative and maximize its positive impacts, actively engaging with all business partners throughout the value chain.

Noval Property R.E.I.C. commits to helping their customers and business partners achieve their sustainability ambitions by providing knowledge, solutions, and support. Through industry collaborations and initiatives, the Company contributes to improving sustainability performance across its value chain. Noval Property R.E.I.C. commits to meet society's current and future needs by seeking to provide low-carbon, circular and safe buildings that respect their employees, social partners and the environment.

Noval Property R.E.I.C. is committed to complying with all applicable laws and regulations and adopting robust governance practices. Noval Property R.E.I.C. pledges to:

- Uphold zero tolerance for bribery, fraud, unfair competition, and other inappropriate business behaviours.
- Promote anti-corruption practices and operate with integrity across their operations and value chain.
- Advocate for ethical business practices among all business partners.

The Company continuously strives to identify opportunities and risks related to climate change, resource management, and environmental protection across its value chain. Noval Property R.E.I.C. engages in sound environmental practices by taking the following actions:

- Reducing carbon emissions and improving energy efficiency.
- Transitioning to low-carbon and circular economy practices.
- Promoting recycling and the use of secondary raw materials, ensuring sustainable consumption and production.
- Rationalizing water usage.
- Protecting biodiversity.

Noval Property R.E.I.C. commits to take action to combat climate change, as well as preserving natural resources that the Company relies on, promotes recycling and circular economy to create more sustainable consumption and production, while at the same time seeking to maximize the utilization of secondary raw materials.

Noval Property R.E.I.C. safeguards labour and human rights and promote safe and appropriate working conditions. The Company is committed to:

- Ensuring the mental health and well-being of their personnel.
- Providing equal opportunities for learning and development.
- Fostering a culture of diversity and inclusion, with equal opportunities, zero tolerance for any form of discrimination or harassment.
- Encouraging an inclusive environment that respects individual characteristics, such as gender, age, sexual orientation, nationality, and beliefs.

Noval Property R.E.I.C. commits to treating all people with respect, continue working against discrimination and harassment in all its forms, and to being an inclusive organization which respects individual characteristics such as gender, age, sexual orientation, nationality, religious and political beliefs. Noval Property R.E.I.C. strives to develop their

employees to their fullest and to attract new talent in order to create a diverse and inclusive workforce with the right competencies.

Noval Property R.E.I.C. recognizes the evolving nature of sustainability challenges, risks, and opportunities in environmental, social, and governance and sustainability matters. The Company commits to regularly reporting on sustainability policies, goals and targets, and progress achieved in sustainability reports, as well as engaging with all stakeholders to understand and address sustainability performance improvements, contributing to a more sustainable world.

Governance and Accountability

Noval Property R.E.I.C. ensures that accountability for acting in a socially responsible and sustainable manner is embedded at all levels of the organization. Responsibility for the implementation of this policy lies with the most senior executive responsible.

This policy reflects the shared commitment to sustainability as a cornerstone of Viohalco's long-term value creation.

Distribution and Communication

It falls into the responsibilities of Noval Property R.E.I.C.'s management to communicate the content and the spirit of this document to all employees, direct and associated, also to stakeholders. This policy is published and posted on the Company's intranet and websites.

The policy will be reviewed annually to ensure compliance with legal requirements and any other relevant updates.