

**Disclosures under Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (the SFDR)**

Mitiska REIM (LEI no. 549300YHUMUE6PEEZF50) makes the following disclosures in accordance with articles 3, 4 and 5 of the SFDR.

**Integration of sustainability risk in the investment policies**

In accordance with the SFDR sustainability risk means an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment. For Mitiska REIM, sustainability risks are risks which, if they were to crystallise, would cause a material negative impact on the value of the real estate assets in which its funds have invested.

Mitiska REIM is committed to integrate sustainability risk incorporating environmental, social and governance factors across all aspects of its business activities, including its investment decision-making process. The integration of sustainability risk in the investment process has been included as a principle in the ESG policy of Mitiska REIM. In this respect, sustainability risk will also be included as a risk factor that has to be considered in the risk management charter of Mitiska REIM.

Mitiska REIM incorporates ESG criteria in the acquisition and development processes of new real estate assets, by making ESG factors an integral part of the investment and development process, with the objective of, amongst other things, reducing exposure to risk. Material ESG topics that Mitiska REIM considers are energy and emissions, sustainable building certifications, multi-modal transport connectivity and accessibility, as well as tenant attraction, retention and engagement. For new acquisitions, all potential properties undergo an ESG due diligence process to assess risk, opportunities and challenges which will be taken into account in the final investment decision and asset business plan. For new developments, ESG requirements are integrated through the entire development process and/or value-add programme in order to improve the overall performance and sustainability of assets. In addition, ESG due diligence is undertaken to assess factors such as building safety, resilience to climate change, energy efficiency, water efficiency and legislative risk. Following the investment decision, Mitiska REIM continues to take ESG aspects into consideration while managing its funds' assets.

**Integration of sustainability risk in the remuneration policy**

Mitiska REIM pays its staff a combination of fixed remuneration and variable remuneration. Variable remuneration for relevant staff takes into account compliance with all policies and procedures, including those relating to the impact of sustainability risks on the investment decision making process and discourages excessive risk-taking, including in relation to sustainability risks.

## **Principal Adverse Impact reporting**

Adverse sustainability impacts relate to the risk that the investment in the real estate assets via the funds may have on sustainability factors.

Mitiska REIM believes that considerations concerning ESG factors play a crucial role in being a responsible alternative investment fund manager and are a key driver in creating long-term value for all stakeholders and for society by making its business and the managed assets 'future-proof'. Mitiska REIM is therefore of the opinion that the consideration that the investment in a real estate asset may have an adverse impact on sustainability factors should form part of the investment process and has formalised its approach to assess certain of these potential adverse impacts. In this regard, Mitiska REIM uses external benchmarks which include GRESB, INREV and BREEAM. This results in Mitiska REIM's commitment to consider certain potential adverse sustainability impacts without, at this point in time, considering all adverse sustainability impacts under the SFDR.

Therefore, in accordance with article 4.1(b) of the SFDR, Mitiska REIM states that it does not consider the adverse impacts of investment decisions on all of the sustainability factors as referred to in article 4.1(a) of the SFDR and does not make the disclosures as described in article 4.1(a) of the SFDR. Given the size of the organisation of Mitiska REIM, such disclosure as referred to in article 4.1(a) of the SFDR and the administrative burden in connection therewith would currently not be proportional. Mitiska REIM will review its position on a regular basis taking into account the evolution of the applicable rules and the results of the consideration of certain potential adverse sustainability impacts that it currently takes into account.