

**VIA OUTLETS**

# **SUSTAINABILITY POLICY**

**DECEMBER 2023**



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## **1. WHO WE ARE**

VIA Outlets creates sustainable premium outlet shopping destinations throughout Europe, serving a growing consumer demand for unique shopping experiences. As commercial real estate experts, we manage our portfolio to create long term value. As retail experts, we combine the showcasing of premium and beautifully local brands, the best local food and a sustainable environment to generate a lasting experience both for the national and international guests.

As members of both the commercial real estate industry and the retail industry our long-term vision incorporates a sustainability journey aimed at minimizing our footprint, implementing a circular business model, maximizing employee and guest well-being and increasing awareness and expectations around sustainability with brand partners (in this policy also referred to as tenants) and guests, thus contributing to the shopping environment of the future.

### **1.1. HOW WE ARE ORGANISED**

The first step towards setting an ambitious sustainability strategy is defining its governance. Sustainability is a key driver of the business strategy of VIA Outlets, and the main pillars and targets of this strategy are defined by the Board of Directors, under the leadership of the CEO and with the advice and the recommendations of the ESG Committee.

The implementation of the Sustainability strategy is the responsibility of the Head of ESG, who involves all relevant Heads of Function at Group and Centre level, through the ESG Committee, the Sustainability Taskforce and regular Centre Sustainability meetings.

The key Heads of Function (Operations, Development, Retail Development, Human Resources and Retail) take on the responsibility of the Sustainability targets linked to their scope of responsibility. In addition, the variable remuneration of all employees is linked to overarching Sustainability targets, and area specific Sustainability targets are part of the personal targets for specific functions.

### **1.2. SCOPE AND APPLICABILITY**

This Sustainability policy, including any standards and commitments linked to environmental, social and governance topics, applies to VIA Outlets and all its subsidiaries regardless of where they are located. In addition, this policy is also applicable to our value chain, to the extent it refers to our relationship with suppliers, brand partners, guests or other third parties.

### 1.3. HOW WE ENGAGE WITH OUR STAKEHOLDERS AND HOW WE COMMUNICATE

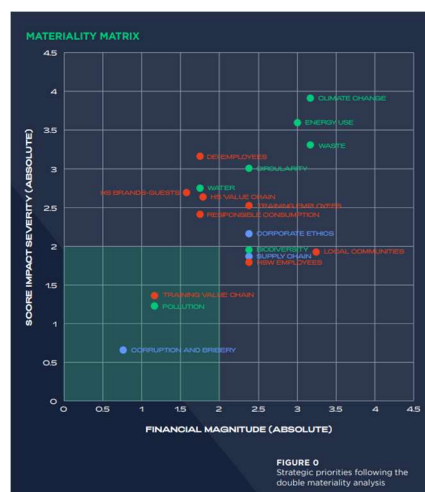
Transparency and information sharing are part of our Sustainability strategy, which is why we dedicate a lot of time and resources to gathering data with respect to our impacts and informing and consulting with our stakeholders to define our sustainability journey. We report on our data and achievements on our website and through our Sustainability Report, as well as to our Board and shareholder on a quarterly basis. We provide our employees with training and information on the Sustainability strategy and priorities, and we engage with our suppliers and tenants through workshops, newsletters and one to one meetings.

### 1.4. MATERIALITY

The issues we focus on as part of our Sustainability Strategy are defined by our Double Materiality analysis. This analysis was carried out with a view to aligning with the EU Corporate Sustainability Reporting Directive (CSRD) and included stakeholder feedback on our strategic sustainability priorities from both "inside out" and "outside in" perspectives:

- Inside out: The impacts our activities and business relationships have on people and the environment.
- Outside in: The ESG topics that might affect our financial performance.

The material topics resulting from our double materiality analysis are those reflected in our Materiality Matrix.



This list includes all topics we have already been focussing on in our Beyond Sustainable strategy. We have also identified the relevant boundary and sustainable development goals associated with each topic.

**ENVIRONMENTAL**

- T1: Climate Change
- T2: Energy Use
- T3: Pollution related to construction and demolishing of buildings
- T4: Water use and management
- T5: (Biodiversity) usage of water and land
- T6: Circularity

**SOCIAL**

- T8: Health, safety and wellbeing own workforce
- T9: Diversity, equality and inclusion own workforce
- T10: Employee training and skills development own workforce
- T11: Impact on local communities
- T12: Responsible consumption
- T13: Health and safety of brands and guests
- T14: Health and safety of workers in the value chain
- T15: Training and skills of workers in the value chain

**GOVERNANCE**

- T16: Ethical corporate culture
- T17: Preventing corruption and bribery and money laundering (in the value chain)
- T18: Sustainable supply chain

**1.5. FOUR PILLAR STRATEGY**

Our Sustainability strategy is based on a 4-pillar approach, which has demonstrated to encompass the material issues that are identified as relevant for our company and our industry:

- I. Sustainable Buildings:** We aim to minimize the environmental impact of our buildings and contribute to limiting the global temperature increase to 1,5°C. In doing so we work with all aspects of our value chain (design, development, operations and tenants), to become more efficient, reduce our carbon emissions and implement innovative solutions, so as to generate synergies and work with our partners towards a common goal.
- II. Responsible Consumption:** Our strategy is to provide our guests with a sustainable and unique premium shopping experience. This means we enhance the positive and reduce the negative social and environmental impacts of the experience, at different levels: transport to the centre, food & beverage options, recycling, reduction and phasing out of single use plastics and sustainability of the products sold. On this last point, we support and encourage our brands in their sustainability initiatives, and we work with them and our communities to promote responsible consumption, reuse and recycling.

- III. Resilient communities:** We take our responsibility towards our communities - our employees, our suppliers, our brand partners, our guests and our local communities - very seriously, which is why we set ourselves ambitious standards in safeguarding their health, safety and wellbeing, and promoting accessibility in all our Centres. We also strive to create a working and shopping environment that is inclusive and embraces diversity.
- IV. Stakeholder engagement:** Our stakeholders take an active part in defining our Sustainability strategy, which is why we continuously improve our reporting, engage with them on our targets and activities, provide training and generate awareness around sustainability issues. We also work with partners and experts on our material sustainability issues so that we improve our understanding of our impacts and increase our efforts to create value for society.

We set short, medium and long-term targets as part of our Sustainability strategy, publish the most relevant ones on our website and report on our progress through a yearly Sustainability Report, as well as in our Annual Report.

## 2. ETHICAL AND RESPONSIBLE MANAGEMENT

We believe that respect, transparency and accountability should be at the heart of all our management and operational practices. Accordingly, VIA Outlets has implemented a series of Codes, Policies and Procedures aimed at applying and endorsing these ethical values and

avoiding any illegal or dishonest activities, including a Code of Ethics, a Supplier Code of Conduct, an Anti- Bribery, Anti-Corruption and Anti Money Laundering Policy, a Gifts and Hospitality Policy, a Whistleblowing Policy, an Information & Cyber Security Policy, a **Data Protection Policy**, and a Travel and Expenses Policy.

Our Code of Ethics ensures that all VIA Outlets employees:

- Conduct themselves, at all times, in a professional manner that sustains and promotes the integrity of the business. To this end they should:
  - Not engage in any professional conduct involving dishonesty, fraud or deceit or commit any act that reflects adversely on our professional reputation, integrity, or competence;
  - keep strictly confidential all business information which comes to their knowledge in the course of their work.
  - Act in the best interests of the business and in accordance with our values and the applicable laws, avoiding any situations which

compete with or might be reasonably expected to create a conflict of interest with VIA Outlets' business interests.

- Refrain from any action related to bribery, corruption or money laundering.
- Use company assets for an appropriate business purpose, and never for criminal or immoral activities.
- Work in a sustainable way, in line with the company Sustainability Policy.
- Use the VIA Outlets Whistleblowing procedure if they become aware of any practices they believe in good faith and based on reasonable grounds to constitute wrongdoings.

All new starters at VIA Outlets are provided with extensive training on our policies and codes within the first 30 days of their employment as part of their induction plan, with annual refresher training thereafter.

Failure to comply with the VIA Outlets Code of Ethics and its other compliance policies, may lead to serious repercussions, including disciplinary action or other financial or employment consequences in line with applicable laws and the VIA Outlets Policies in force in each VIA Outlets market.

### ***POLITICAL NEUTRALITY***

VIA Outlets is politically neutral. It does not take a position in favour of or in opposition to any political party nor does it make political contributions.

## **3. CORPORATE GOVERNANCE**

The Board of VIA Outlets is responsible for the management of the company and the general affairs of the business. The Board oversees the overall direction and operation of the VIA Outlets group. The Board is composed of 8 Directors (4 Executive and 4 Non-Executive directors). The Senior Leadership Committee, the Executive Committee and the wider Leadership Team support the Board in executing the VIA Outlets' strategy. The Board of Directors is ultimately responsible for the definition of the VIA Outlets ESG strategy, and the Executive Committee and Leadership Team are accountable for its implementation.

Special Purpose Committees support the Board with expertise and advise on key business topics and in relation to compliance and controls (such as a Remuneration Committee, an Audit Committee, a Strategic Risk Committee, the ESG Committee and the Health & Safety Committee.

ESG Governance is delegated by the Board to:

- The ESG Committee, composed of an Executive Member of the Board

and Head of Legal Affairs, the Human Resources Director, the Head of Strategy and Asset Management and the Head of ESG. The ESG Committee is the senior management body which defines and reviews long term portfolio wide Environmental, Social and Governance targets and strategies. This Committee specifically addresses the Climate Change strategy, the Diversity, Equality and Inclusion strategy and the Governance related to ESG issues. The Committee comes together three times per year.

- The Sustainability Taskforce: this is an interdepartmental steering committee which approves and monitors the implementation of the Group Sustainability Action Plan as well as any group-wide projects aimed at achieving our strategic sustainability targets. The Sustainability Taskforce includes senior leaders from all main departments and business areas (Operations, Development, Retail Development, Retail, Leasing and Marketing) as well as a Regional Business Director in representation of the Centres and meets every two months to review the status of the Sustainability Action Plan as well as specific projects related thereto.
- The responsibility for the Sustainability Action Plan of each VIA Outlets' Centre lies with the Centre Director, who delegates the coordination of this plan to a designated **Sustainability Champion**. The matrix organisation ensures that the different departments represented in the Centres also receive clear guidelines from the Heads of Department represented in the Sustainability Taskforce.

Based on the commitment to guarantee and protect the shareholders rights in all its aspects, shareholders' meetings are organised and held in accordance with the Articles of Association enabling the Board to fully update the shareholders on all business topics and relevant matters and to provide all the necessary information and clarification as required by the shareholders and/or by the applicable law.

## 4. ENVIRONMENTAL AND CLIMATE CHANGE POLICY

### 4.1. VIA OUTLETS' NET ZERO POLICY

VIA Outlets commits to a net zero emissions objective by 2050. In order to achieve this, it is in the process of setting near-term and long-term science-based targets regarding the following emissions:

- i. Operational emissions: energy intensity and emission targets are set for 2030 and 2050 using the CRREM tool.
- ii. Embodied carbon emissions regarding its own development projects



- iii. Transport emissions, regarding the emissions generated by guests and employees coming to the Centres.

## **4.2. VIA OUTLETS' ENVIRONMENTAL COMMITMENTS**

VIA Outlets is committed to protecting the environment, by mitigating potential negative impacts its activities may cause. In particular, VIA Outlets works to continuously improve its energy and water efficiency, to reduce its emissions and those of its value chain, to reduce or reuse and recycle waste and to minimize its impact on the ecosystems and implement projects which contribute to the biodiversity of its surroundings. Employees, suppliers and guests are encouraged to adopt an environmentally responsible behaviour and VIA Outlets engages with its stakeholders to continue raising awareness on this issue.

This Policy is the point of reference for all our employees as well as any companies or persons working on our behalf or in our Centres and provides the framework on the basis of which targets are set, actions are implemented, and outcomes are monitored.

VIA Outlets as a group and each one of its Centres commits to:

- Complying with international and local applicable environmental legislation, as well as any voluntary requirements that VIA Outlets decides to commit to.
- Identifying and analysing the qualitative and quantitative risks related to its activities from an environmental perspective, both in terms of how its activities affect the environment and how the environment can affect its activities, in particular, the Centres' resilience and capacity to adapt to physical, transitional, and social risks related to climate change. In order to do this, VIA Outlets commits to:
  - Carrying out physical and transition Climate Change risks and opportunities analyses on all its assets, taking into account different climate scenarios.
  - Incorporating the results of these analyses in its Investment Plans, to ensure its assets are fit for future climate scenarios and take advantage of identified opportunities.
  - Monitor the evolution of the impact of its climate change strategy.
- Implementing an environmental management system that prevents or minimises the environmental impact of its activities and continuously improves its performance.
- Set ambitious goals both at Group and Centre level, following the

guidance of this policy.

- Carry out all its activities (development, operation, management of its Centres) with the protection of the environment in mind, in particular the prevention of pollution, the efficient use of resources and the implementation of circular economy principles. In particular:
  - **Carbon footprint:** VIA Outlets commits to mitigating its carbon footprint by reducing its GHG emissions, and to adapting its assets to climate change, incorporating the transition and physical risk evaluations as drivers of its business strategy. In this context, VIA Outlets commits to:
    - Implementing energy efficiency measures and engage with its tenants to do the same.
    - Defining GHG emission reduction targets for scope 1 and 2 (the emissions generated by its own activity and the energy it consumes) and working on reducing its scope 3 emissions (the emissions generated in its value chain by suppliers and tenants).
    - Transitioning to the consumption of 100% renewable energy for its landlord operations.
    - Reducing the use of fossil fuels.
    - Minimising the impact of refrigerant gasses.
  - **Water consumption:** VIA Outlets commits to defining water consumption reduction targets and implementing water efficiency measures which will reduce the water footprint of its operations.
  - **Waste management:** VIA Outlets commits to implementing a waste management strategy in all its Centres aimed at minimizing waste going to landfill and promoting recycling and reuse.
  - **Circular economy:** VIA Outlets focuses on identifying key actions to be taken in our Centre Development and Retail Development activities with a view to reducing our footprint, increasing the use of sustainable materials and maximising the opportunities offered by circular economy models.
  - **Biodiversity:** Protect biodiversity and ecosystems and promote actions that can contribute to the same.
  - **Awareness raising:** Provide information and raise awareness amongst employees, brand partners, operators, suppliers, and guests with respect to the importance of protecting the environment.
  - **Supply Chain:** Set minimum supply chain standards for critical

suppliers and promote best management practices amongst suppliers and partners, as well as apply environmental criteria in our procurement processes, in particular with respect to environmental management, sustainable materials and emissions reduction.

- **Collaboration:** Collaborate with other organisations in the promotion of a carbon-free and circular economy.
- **Communication:** Communicate our environmental performance to all our stakeholders on a regular basis, in a transparent manner and consult them with a view to considering their sustainability concerns.

### 4.3. ENVIRONMENTAL CONTEXT

VIA Outlets at group level and each of its Centres commit to:

- Applying continuous energy improvement, through the systematic assessment of performance and implementation of energy efficiency measures;
- Setting targets for energy consumption and carbon emissions and providing the resources for their achievement;
- Moving forward in the use of renewable resources;
- Establishing common standards of energy management, sharing best practices and gradually implementing energy management systems that optimize efficiencies and contribute to reducing their consumption;
- Collaborating actively with tenants and suppliers in order to move forward on energy targets and standards.

### 4.4. WASTE MANAGEMENT

With the aim of reducing waste generation, VIA Outlets as a group and each of its Centres shall:

- Conduct detailed waste audits at each one of its Centres, as required;
- Identify its key waste streams and monitor their quantities with a view to reducing them and promoting reuse and recycling;
- Work towards minimising the waste sent to landfill where possible;
- Provide Centre-level targets and develop key performance indicators;
- Engage with brand partners and guests with a view to minimizing waste generated by them and introducing, where possible, incentives for changing behaviour;

- Strive to minimise waste produced in construction, expansion or refurbishment works in line with BREEAM Construction Excellent requirements.

#### **4.5. WATER MANAGEMENT**

Water consumption in our Centres happens mostly in relation to three activities:

- Use of water in bathrooms by tenants and guests of our Centres
- Cleaning activity of our Centres;
- Use of water for irrigation of landscaping in and around the Centres.

As part of its Climate Change strategy, VIA Outlets has carried out a Climate Change risk assessment on all its Centres and has identified medium to high risks related to water scarcity in its Centres located in Spain and Portugal.

With the aim of minimising its water footprint, VIA Outlets as a group and each of its Centres shall:

- Identify asset-specific water related impacts, risks and opportunities in its own operations and value chain.
- Conduct water audits in all Centres;
- Set Centre-level potable water consumption reduction targets and develop key performance indicators;
- Install water-saving and leak detection equipment in the Centres in line with BREEAM Excellent requirements and the VIA Outlets Sustainable Construction and Refurbishment Guidelines, particularly in conjunction with extension or refurbishment activities.
- Install sub-metering to monitor water use related to different activities.
- Reduce water use in the Centres by providing education and communication around efficient water management to employees, tenants and guests and, where applicable, by offering behavioural change incentives;
- Reduce the risk of Legionella through continuous monitoring and proactive management;
- Implement rainwater harvesting solutions in all Centres and greywater use facilities in common area bathrooms - where possible; and
- Minimise water use in any construction, extension or refurbishment activities by ensuring that efficient water management processes are put in place.

Additionally, all centres and departments are subject to the more detailed Water Policy attached to this Sustainability Policy as attachment 1.

#### **4.6. BIODIVERSITY**

VIA Outlets as a group and each of its Centres will actively seek to protect and enhance local flora and fauna around the Centres. To this end:

- Ecological surveys will be carried out on new developments and extensions to understand their impact on local biodiversity and habitats;
- The planting of native flora species will be favoured;
- Green spaces will be included, where possible, and latent spaces will be used for incorporating biodiversity features, such as bird nests, beehives, planters or green walls;
- Where any extension activities are contemplated, a biophilia study will be carried out which incorporates nature and natural patterns into the design of the Centres (through, for example, environmental elements, space layout, outside views and landscaping).

#### **4.7. SUSTAINABLE MATERIALS**

VIA Outlets aims to reduce its impact on scarce natural resources and the natural environment. With this in mind, sustainability guidelines are part of our Works Manuals for tenants and our Procurement Guidelines.

Through these, VIA Outlets and each of its Centres seek to:

- Increase the use of certified sustainable materials in the design and construction of new shops, Centre extensions and remodelling;
- Systematically consider opportunities to reuse existing materials and structures;
- Consider the use of materials with lower environmental impact and lower embodied carbon.

## 5. HEALTH, SAFETY AND WELLBEING

Health and Safety activities are directly linked to the well-being of our guests, brand partners and their employees, suppliers, and our own employees, as well as anyone else visiting our Centres.

An inability to secure the physical safety and well-being of our guests, contractors, and other third parties on site at our Centres could have a negative impact on the attractiveness of our centres to brands and guests and could also result in physical injuries and, in extreme cases, casualties, particularly in relation to certain activities carried out by our and our tenants' suppliers.

We take a proactive approach to identifying and managing potential health and safety hazards for all occupants of our Centres (VIA Outlets employees, brand employees, supplier personnel, guests) as well as implementing measures and initiatives which increase the well-being of all these stakeholder groups. Our risk assessment shows that the activities of our business which could entail health & safety risks are linked to in-centre construction and refurbishment activity, as well as building maintenance activity. These risks mostly affect our suppliers active in the construction and the facility management sector, as well as suppliers of tenants carrying out refurbishment activity in our Centres. As all our Centres are based in Europe where labour and health & safety regulations are well-established, and we tend to work with local suppliers, we have not identified any specific risks linked to migrant workers or other categories of employees which could be considered under higher risk.

Additionally, we carefully monitor any health and safety risks linked to office work and mental health risks linked to workload which could potentially affect the VIA employees.

The way we deal with these Health & Safety risks as well as with potential health & safety incidents is as follows:

- Our Board has approved, and the company implemented strict health and safety policies and rules applicable to all our work environments (Centres and offices), and all occupants, including VIA employees, suppliers, tenants and guests.
- We have a Procurement Policy which sets high health & safety standards for our suppliers.
- We are implementing the ISO 45.001 standard to ensure we continuously monitor risks and regulatory requirements and improve our preventive measures and our processes to manage our risks as well as manage any opportunities.
- We monitor our health and safety incidents closely and set targets to improve on our health & safety management.
- We have an action plan in place that is revised each year to ensure we progress adequately towards our targets.

- We engage with our stakeholders on a regular basis, through surveys and direct engagement to understand their health & safety concerns and commitment toward our targets.

The well-being of our employees, our tenant staff and our guests is also a priority in the VIA Outlets business strategy. Through our Breeam In Use, construction and Refurbishment certifications, we aim to continuously improve on the working conditions of employees present in our Centres, considering aspects such as natural light, temperatures, ventilation and other physical aspects of their working conditions.

In addition, the wellbeing of VIA Outlets employees is the object of a separate action plan which addresses all impacts, risks and opportunities.

## 6. HUMAN RIGHTS & SUPPLY CHAIN POLICY

### 6.1. HUMAN RIGHTS

VIA Outlets is committed to respecting the dignity and human rights of all people, and we identify potential human rights risks in our own activities as well as in our value chain and take measures to manage these risks.

VIA Outlets prohibits the use of child labour and forced or compulsory labour throughout its operations, extending to its partners, suppliers and contractors and complies with the national legislations its Centres are located in. We draw from International Treaties and frameworks such as the **ILO recommendations and the OECD Guidelines for Multinational Enterprises**. These standards are set out in VIA Outlets' Supplier Code of Conduct, which we expect our suppliers and business partners to respect.

### 6.2. OUR PEOPLE

VIA Outlets' is fully committed to creating an environment within which our employees can thrive in their roles, and one where personal growth and development is actively encouraged and achieved with an employee-led approach.

Via Outlets promotes diversity and equity in its teams and an inclusive leadership style, thus reflecting the diversity of the communities it is part of. These principles are reflected in our People and Equal Opportunities Policy and in our Diversity and Health & Safety Action Plan. We are committed to offering all our employees equal opportunities and we take a firm stance against any conduct or practice that could result in prejudice motivated by gender, race, ethnic origin, skin colour, age, disability, religion, political opinion, marital status, sexual orientation, family responsibility, or social status.

VIA Outlets implements policies and practices in recruitment, promotion, training, remuneration and other working conditions which are based solely on merit and skills in function of the requirements of the job.

VIA Outlets ensures EU minimum standards on working hours are respected and all local legislation followed in relation to working hours across all markets,

Wherever possible, and where the role permits, employees are provided with flexible work options including hybrid working, with a view to ensuring their work-life balance.

VIA Outlets recognises that employees deliver at their best in a safe, healthy and positive work environment, and it has policies, procedures and initiatives in place to protect their safety, and address any wellbeing issues that may arise.

VIA Outlets employees are guaranteed their fundamental freedom to association and their right to collective bargaining.

VIA Outlets understands its responsibility in managing and maintaining a positive working environment. Issues regarding harassment, bullying and victimisation are taken very seriously and addressed in line with applicable regulations specific for each market. A confidential whistleblowing platform is in place at VIA Outlets to ensure that issues in the workforce are addressed effectively.

VIA Outlets engages with its employees on an annual basis through an employee engagement survey, to measure their overall satisfaction with their working environment, as well as specific questions related to job satisfaction, performance management actions, development opportunities, work-life balance, sustainability and other topics. The survey is followed by feedback sessions on a departmental basis as well as a yearly action plan. This is part of a wider employee engagement programme in which VIA Outlets continuously works to improve the satisfaction of its employees.

### **6.3. OUR SUPPLY CHAIN POLICY**

We believe in developing and maintaining strong partnerships with our suppliers and contractors while requiring them to uphold ethical, social, labour and environmental standards aligned with our values and commitments.

These standards are part of our **Supplier Code of Conduct** and in addition, our Procurement Policy includes specific sustainability requirements for high-risk suppliers.

As we continue working with suppliers, we ensure sustainable practices through self-assessments and impromptu audits and we engage with them on specific topics such as sustainable materials, waste management and supply chain



management.

## **7. STAKEHOLDER ENGAGEMENT**

### **7.1. BRAND PARTNERS AND GUESTS**

Our brands and guests are part of our work environment and as such we engage with them on a regular basis to promote the sustainability of our Centres and a healthy and responsible shopping environment.

Engagement with brands takes the form of workshops, regular one-to-one meetings, centre-wide events and feedback sessions. This is supported through our brand surveys, followed by action plans for improvement to ensure our brand partners' needs and preferences are taken into account.

For all new or renewed tenant leases, green lease clauses are incorporated to ensure environmental stewardship practices aligned with our environmental and climate change targets. In addition, we engage with our brand partners on technical guidelines for sustainable construction and fit-outs.

### **7.2. SHAREHOLDERS AND INVESTORS**

We engage with our shareholder to demonstrate that sustainability and responsible investment adds value to our business. We provide regular updates to our shareholder on our sustainability performance in the form of regular sustainability meetings, as well as the quarterly updates on the environmental performance of each of our Centres and our portfolio as a whole. In addition, VIA Outlets reports to the Global Real Estate Sustainability Benchmark (GRESB), allowing further review by investors of our sustainability performance.

### **7.3. GUESTS**

Our guests are increasingly interested and concerned with the social and environmental impacts of their shopping behaviour, which is why it is important for us to engage with them on all initiatives we are undertaking to mitigate our negative impacts and enhance our positive impacts. We also strive to implement initiatives aimed at raising awareness around the importance of sustainability in the outlet environment and actively request feedback from them so as to turn their suggestions into actionable improvements and increase their satisfaction with our services.

### **7.4. GOVERNMENT AND LOCAL AUTHORITIES**

VIA Outlets aims to work with all levels of government in the jurisdictions in which we operate in order to be an active and contributing member to our communities. This may include, for example, responding to government

consultations, liaising with local representatives and councillors, and taking part in working groups.

### **7.5. COMMUNITY ENGAGEMENT**

Taking into account the unique socio-economic circumstances of each of the regions VIA Outlets operates in, we proactively pursue to create a positive impact in these communities, through the implementation of our “beautifully local” strategy. Each centre has specific community engagement activities, which focus on supporting local organisations as part of our ESG education programme, participating in environmental or social initiatives, creating employment in local communities, promoting community wellbeing, supporting local charities or sponsoring local teams or events.

## **8. INTERNAL WHISTLEBLOWING POLICY & EXTERNAL GRIEVANCE CHANNEL**

**VIA Outlets’ Whistleblowing Policy** and **SpeakUp** channel provides any employee with the opportunity to communicate a perceived wrongdoing or irregularity in a confidential and anonymous way, and under the guarantee that he or she will be protected from potential reprisals or victimisation.

Additionally, any other stakeholder can also voice its concerns through the grievance mechanism located on our corporate website and all Centre websites.

VIA Outlets guarantees that the employees’ and stakeholders’ grievances will be registered, investigated and resolved in a serious and timely manner.

## **9. INVESTMENTS AND ACQUISITIONS**

As sustainability is a strategic pillar of VIA Outlets’ business strategy, sustainability criteria are part of any acquisition due diligence process.

## **10. REVISION OF THIS POLICY**

This policy will be revised at least once every three years, to ensure it responds to stakeholders’ expectations and is in line with existing regulatory requirements.

Last revised on 22/11/2023