

ESG POLICY

(ENVIRONMENTAL, SOCIAL AND GOVERNANCE SUSTAINABILITY)

VECTOR MAIS

Projectos e Obras de Interiores, S.A.

vectormais

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1. INTRODUCTION

VECTOR MAIS – PROJECTOS E OBRAS DE INTERIORES, S.A., (hereinafter referred to as "**VECTOR MAIS**") is a company subject to Portuguese law and which develops projects for the design and construction of interior spaces, offering global solutions for offices, hotels, retail and health spaces.

With the aim of making the commitments established within the scope of the ESG criteria (Environment, Social and Governance) known, as well as the approach regarding the execution of construction projects, **VECTOR MAIS** adopted an ESG Policy (hereinafter referred to as "Policy") that describes how it will integrate the involvement of ESG criteria in its investment strategy, namely in the selection of assets, in its governance, in risk management and in the marketing of its services.

In the preparation of the Policy, **VECTOR MAIS** respects the regulatory framework in force and, in particular, the provisions of Regulation (EU) 2019/2088 of the European Parliament and Council of 27 November 2019 (Sustainability Finance Disclosure Regulation, abbreviated as SFDR).

2. SUBJECT MATTER

The criteria set out in this Policy shall apply concerning any securities whenever **VECTOR MAIS** provides interior design and construction services.

It should be noted that, at the present date, **VECTOR MAIS** does not provide interior design and construction services that promote, among others, environmental or social characteristics (light green products, provided for in article 8 of the SFDR) or aimed at sustainable investments (dark green products, referred to in article 9 of the SFDR).

3. STRATEGY: AXES OF APPLICATION

a) The ESG strategy as a result of fiduciary duties

VECTOR MAIS understands that the issue of sustainability has strategic value in the development of its activity and that the content of this Policy is a result of the fiduciary duties it assumes before its clients, under the terms of the law.

On the one hand, this strategic proposition reflects a direction that allows risks to be identified in prospective investments. On the other hand, this vision also brings investment opportunities and long-term value creation for its clients.

b) The ESG strategy as a complement to the company's mission and values

VECTOR MAIS recognises that the weighting of sustainable investment criteria is aligned with its values and mission, namely in terms of environmental and social sustainability and governance.

c) Axes of application

This Policy implements the main axes of ESG action within the scope of **VECTOR MAIS'** activity: corporate and product governance; risk management; investment policy; remuneration policy and provision of information. For context, the general principles assigned to each of the axes of application are set out below.

4. GENERAL PRINCIPLES

a) Commitment

VECTOR MAIS understands that the criteria for sustainable investment imply a binding commitment and publicly assumes their content and extent.

b) Adaptability

VECTOR MAIS devotes care to ESG issues as applicable to interior design and construction services, depending on the characteristics described in the corresponding contractual documents.

However, **VECTOR MAIS** recognises that the regulatory framework on ESG matters is not complete, which results in some fragmentation and asymmetry in the information made available by issuing companies, whether in the European Union (where several regulatory reforms are still ongoing within the ESG scope), or outside the European Union (where mandatory measures comparable to those in force within Europe are not in force).

c) Proportionality

VECTOR MAIS considers and takes into account sustainability risks, taking into account the nature, scale and complexity of its activities. In particular, it should be noted that **VECTOR MAIS** is not covered by the criteria of larger institutions set out in article 4, paragraphs 3 and 4 of the SFDR Regulation.

d) Truth and integrity

VECTOR MAIS recognises that the ESG information to be disclosed must be true, clear and objective, and for this reason the information disclosed in this context will always be free from distortions and exaggerations, which in practice is called green-washing. Rather, it is intended that the whole ESG approach, and the corresponding information, be conducted in accordance with the principles of truth and integrity.

e) Currentness and coherence

VECTOR MAIS undertakes to keep the information regarding this Policy and its compliance therewith up to date. **VECTOR MAIS** commercial communications may not contradict the information disclosed under this Policy.

5. IMPACT ON INVESTMENT POLICY

a) Identification and definition of priorities with regard to the main negative impacts and sustainability indicators

The indicators related to ESG objectives that will be decisive in the execution of investment decisions will deserve special attention by **VECTOR MAIS**, which will conciliate them with the specificities of each service and the investment policy.

Nevertheless, **VECTOR MAIS** will take into account the following sustainability indicators:

- i. Within the scope of environmental sustainability:
 - ✓ Climate change mitigation;
 - ✓ Adaptation to climate change;
 - ✓ Pollution prevention and control;
 - ✓ Sustainable use and protection of water and marine resources;
 - ✓ Transition to a circular economy;
 - ✓ Protection and restoration of biodiversity and ecosystems.
- ii. Within the scope of environmental sustainability:
 - ✓ Prohibition of gender, human rights, and labour standards based discrimination in the supply chain, child labour, and slavery;
 - ✓ Health and safety in the workplace;
 - ✓ Freedom of association and expression;
 - ✓ Human capital management and labour relations;
 - ✓ Diversity;
 - ✓ Relations with local communities;
 - ✓ Health and access to medicines;
 - ✓ Consumer protection;
 - ✓ Combating inequalities or promoting social cohesion, social integration and industrial relations, or an investment in human capital or in economically or socially disadvantaged communities.
- iii. Within the scope of the governance of companies issuing assets upon investment:
 - ✓ Shareholders' rights;
 - ✓ Remuneration structure;
 - ✓ Composition of governing bodies;
 - ✓ Independence of the members and effectiveness of the supervisory body;
 - ✓ Compliance with legal obligations.

b) List of excluded sectors

Following what is referred to in the previous point, **VECTOR MAIS** refuses to invest in or have commercial relations with any entity or company whose main commercial activity offers or involves the promotion, production, distribution or commercialization of products or services related to:

- ✓ Weapons and ammunition;
- ✓ Activities considered illegal under the laws or regulations of the host country or international conventions and agreements, or subject to phasing out or international prohibition;
- ✓ Corruption, money laundering and terrorism financing;
- ✓ Radioactive materials (except for medical purposes);
- ✓ Forced labour and child labour;
- ✓ Pornography and prostitution;
- ✓ Noxious chemicals;
- ✓ Violation of human rights;
- ✓ Human organ trafficking;
- ✓ Human trafficking.

VECTOR MAIS does not and will not invest in bonds or other sovereign debt securities issued by States that do not respect the exclusions and values present in this Policy.

c) Preferential investment criteria

The investment policy is further described in the **VECTOR MAIS** investment policy, and will likewise be conducted on the basis of external sources of information regarding ESG assessments of the companies issuing financial instruments in which it invests.

6. IMPACT ON GOVERNANCE IN GENERAL**a) Approval by the Board of Directors**

The competence for the approval and revision of this Policy lies with the Board of Directors. In this manner, **VECTOR MAIS** ensures the full integration of this Policy into the governance system.

b) Integration of sustainability risks into the investment decision-making process

VECTOR MAIS seeks to include sustainability risks in the investment decision matrix.

c) Due diligence regarding the negative impacts of investment decisions on sustainability

VECTOR MAIS does not meet the requirements for larger institutions set out in article 4, paragraphs 3 and 4 of the SFDR Regulation.

Nevertheless, **VECTOR MAIS** will use professional diligence to assess the risks arising from investment decisions regarding sustainability, and for this purpose and whenever necessary will resort to external

sources of information regarding the ESG assessments of the companies issuing financial instruments in which it considers to invest.

d) The integration of ESG risk regarding product governance

Within the scope of the **VECTOR MAIS** product governance policy, the design and creation of financial products ("portfolio profiles") is subject to identification, assessment and monitoring of environmental, social or governance sustainability risks, namely when these are qualified as ESG products for the purposes of articles 8 and 9 of the SFDR.

e) The designation of an ESG Officer

The Board of Directors designates an ESG Officer, with advisory functions at **VECTOR MAIS** within the ESG scope.

The ESG Officer supports the Board of Directors in the following tasks:

- ✓ Implementation of **VECTOR MAIS**'s strategy on ESG matters;
- ✓ Monitoring compliance with this Policy;
- ✓ Definition of concrete procedures in the execution of this Policy;
- ✓ Monitoring of the implications of **VECTOR MAIS**' activity on ESG matters;
- ✓ Collection and transmission of information regarding ESG;
- ✓ Dissemination of good practices and promotion of an internal culture aligned with ESG criteria.

This function can be accumulated with others performed at **VECTOR MAIS**.

7. IMPACT ON RISK MANAGEMENT

a) Integration of ESG risks into the risk matrix

VECTOR MAIS recognises that the activity of interior design and construction may be affected by risks of an environmental, social or governance nature with impact on investments made.

For this reason, in the definition, approval and implementation of policies, procedures and risk management mechanisms related to its activity, **VECTOR MAIS** takes into due consideration the eventual events or conditions of an environmental, social or governance nature the occurrence of which may significantly impact the value of the financial and non-financial assets that are part of its portfolio at any given point in time.

The integration of sustainability risks has implications for the implementation of the investment policy, throughout the investment cycle: whether in investment decisions, asset valuation, or even in divestment decisions.

b) The identification, assessment and management of sustainability risks

Depending on the available information, **VECTOR MAIS** identifies, assesses and manages the short, medium and long term risks related to any event or condition of an environmental, social or governance nature with an impact on investments made.

The functions of risk identification, evaluation and management are carried out within the framework of **VECTOR MAIS'** organizational system.

VECTOR MAIS' internal and external risk management reports include the analysis of risks relating to any event or condition of an environmental, social or governance nature with an impact on investments made.

8. IMPACT ON REMUNERATION POLICY

a) Integration of ESG factors in the Remuneration Policy

VECTOR MAIS seeks to integrate sustainability risks regarding remuneration. To this end, it establishes the adoption and compliance with remuneration practices consistent with prudent, sound and effective risk management that does not provide an incentive to take excessive risks that promote potential conflicts of interest with clients or that disregards the importance of sustainable behaviours at investment and management level.

b) Subjecting the remuneration structures to prudent risk management, particularly in matters of sustainability

The Remuneration Policy contemplates remuneration structures that optimize the company's growth, the development of structuring projects, productivity, as well as financial results, promoting sustainable behaviour without generating or exacerbating systemic risks that could undermine long-term investment interests.

When applying mechanisms that allow changes to the remuneration structure, **VECTOR MAIS** ensures the implementation of appropriate incentives for taking precautions and mitigating risks.

Mindful of the importance of balance between metrics aimed at reducing exposure to risks and those that promote sustainable growth, **VECTOR MAIS** integrates factors that mitigate risk into the Remuneration Policy, along with objectives aimed at encouraging business development.

9. PROVISION OF INFORMATION

VECTOR MAIS publishes the "ESG Policy" document on its website www.vectormais.com.

10. APPROVAL, SUPERVISION AND REVISION

This Policy was approved by the Board of Directors on 3 January, 2023, entering into force as of said date.

Compliance with this Policy will always be supervised within the framework of **VECTOR MAIS'** organizational system, where annual reports on the application thereof will be presented. This Policy will be reviewed regularly in the light of experience arising from its application and possible legislative changes.

Adequate knowledge of the exclusion criteria will also be ensured, and no positions explicitly excluded from this policy will be taken.

The necessary control mechanisms will also be implemented to guarantee the identification and monitoring of assets in accordance and as described in the Policy.

11. PUBLICATION

This Policy is available for consultation at the **VECTOR MAIS** website, at www.vectormais.com.