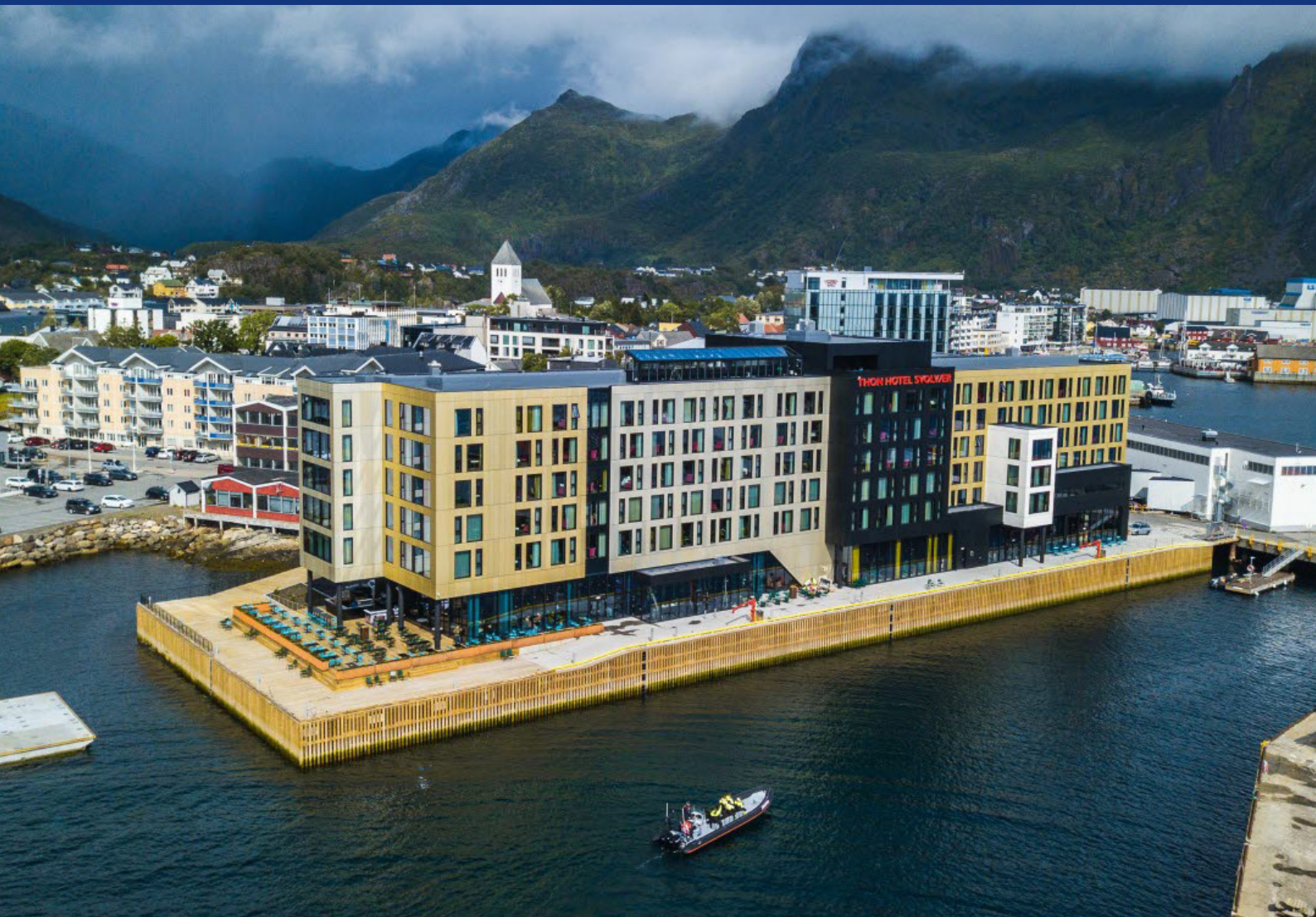


THON GROUP SUSTAINABILITY REPORT 2024



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General information

This is the Thon Group's sustainability report. The purpose of the report is to describe how the Thon Group strives to work more sustainably.

Since 2012, the Thon Group has participated in the UN initiative Global Compact and in 2022, became a member of Ethical Trade Norway. Both organisations are based on principles related to human rights, working conditions, society, the environment and anti-corruption. The group has adopted ambitious targets in order to contribute to sustainable development in society. This is done to ensure values in a long-term perspective, while at the same time being creative in the work we do today.

Basis for preparation

GENERAL BASIS FOR PREPARATION

ESRS 2 BP-1

In 2023, the new EU Corporate Sustainability Reporting Directive (CSRD) was implemented in Norwegian law. Thon Gruppen AS will be subject to the legal requirement in the future. In preparation for the new legal requirement, this report was prepared in keeping with the directive's reporting framework European Sustainability Reporting Standards (ESRS). However, this is not a complete ESRS report. The group is following the development of the Omnibus proposal from the EU with respect to when the group will be covered by the CSRD.

Consolidation and scope

The sustainability report was prepared at the same consolidation level as the financial statements and includes both the parent company and underlying companies in which the group's ownership share is more than 50%. Some data points may deviate from this rule. This will be specified in the individual cases.

The Thon Group's upstream and downstream value chain is taken into account in the double materiality assessment of impacts, risks and opportunities. In addition, certain targets and actions of the group's sustainability strategy include parts of the value chain. This is specified in more detail under the relevant topics.

SPECIAL CIRCUMSTANCES

ESRS 2 BP-2

The Thon Group's greenhouse gas accounts are prepared annually to calculate and report on both direct and indirect greenhouse gas emissions. The greenhouse gas accounts include activity data, financial data and some estimates in certain categories. There is some uncertainty around certain data points in Scope 3 due to the estimates made. See the chapter entitled 'Transition to a low carbon society and climate risk' on page 12 for more detailed information. The group works continuously to improve data, so that the results are more accurate and representative.

The sustainability report is based on the ESRS framework, unlike previous sustainability reports, which were prepared in accordance with GRI. The structure of the report reflects the recommended ESRS structure and the chapters below aim to respond to ESRS disclosure requirements. Any other changes from last year's report in specific topics or data points are accounted for in each chapter.

Corporate governance

BOARD OF DIRECTORS, MANAGEMENT AND ADMINISTRATION

ESRS 2 GOV-1

Roles and responsibilities

Roles and responsibilities in relation to sustainability are delegated and defined in governing documents, including the Thon Group's sustainability manual, sustainability policy and action plan. The board of Thon Gruppen AS is responsible for the company's sustainability efforts and is also responsible for approving the company's sustainability report and report on the Transparency Act. The company's board of directors has adopted the targets set in the strategy.

The executive management of the Thon Group has overall responsibility for achieving the targets in accordance with the sustainability strategy in daily operations. Executive management participated in the previous double materiality assessment project and development of the sustainability strategy. This means that they supervised the process and contributed to setting targets. They will play a similar role in the project to update the double materiality assessment and sustainability strategy in 2025. The sustainability department provides executive management with quarterly updates on the achievement of targets in accordance with the sustainability strategy, as well as an annual status and evaluation of the previous reporting year.

Access to expertise and competence

The company has a dedicated sustainability department with competence and expertise in sustainability. This department has overall responsibility for this area and monitors the company's various departments, as well as executive management. Throughout the year, they provide advice and support where necessary to ensure progress and that targets are achieved on all levels. Management can also draw on the expertise of several other operational and specialist departments, including property services, HR, procurement, development, etc., each of which has responsibility within their respective specialist areas.

Board of directors

As at 31 December 2024, Thon Gruppen AS' board of directors has seven members. All members are dependent members and six of the seven are executive board

members. The board of directors consists of 43% women and 57% men. None of the members are representatives of employees or non-employed workers.

INFORMATION SUBMITTED TO AND ASSESSED BY GOVERNING BODIES

ESRS 2 GOV-2

Throughout 2024, executive management held quarterly status meetings with the sustainability department to discuss the status of sustainability efforts. This was to ensure that actions are handled effectively and that executive management is kept up to date on the topic. Through regular status meetings, executive management has the opportunity to evaluate sustainability efforts, the group's impact and progress.

See page 34 of the appendix for a list of topics submitted to and reviewed by executive management in 2024.

INTEGRATION OF SUSTAINABILITY INTO BONUS SCHEMES

ESRS 2 GOV-3

None of the Thon Group's specialist areas, including sustainability, are included in the group's bonus schemes.

RISK MANAGEMENT AND INTERNAL CONTROL PROCESSES

ESRS 2 GOV-5

Risk management related to sustainability reporting takes place primarily at a general level. The company's business insights department works systematically with data collection and ensuring data quality for quantitative data. To ensure compliance with legal requirements, close dialogue is maintained between the sustainability department and the auditor, as well as the financial reporting department. Ongoing dialogue also takes place with executive management and the sustainability department on sustainability efforts, strategic goals and other sustainability-related topics included in the report.

The company does not take a systematic approach to risk assessment and prioritisation of sustainability reporting or have a strategy for risk mitigation. However, work is underway to develop a holistic approach to interdisciplinary risk management, which will also include sustainability-related risks.

Strategy

STRATEGY, BUSINESS MODEL AND VALUE CHAIN

ESRS 2 SBM-1

Thon Group activities are mainly focused on the acquisition, development and leasing of commercial properties and shopping centres in Norway and Sweden, residential property, as well as hotel operations in Norway, Sweden, Belgium and the Netherlands. The most important customers are tenants, who largely consist of corporate customers in retail and catering, as well as other corporate customers with a need for office premises, and private and business guests at hotels.

In 2024, the group had 6,205 employees in Norway, 105 employees in Sweden, 352 employees in Belgium and 45 employees in the Netherlands.

Strategy

The Thon Group's fundamental values are long-term thinking and commitment, and to be Norway's largest and most profitable real estate group. With the Olav Thon Foundation as its owner, the group will live 'forever' and therefore exercise long-term ownership, also in other business areas. The group will seek further growth going forward, while at the same time ensuring healthy operations. A fundamental principle is that we must innovate to preserve, invest in areas with population growth, be an attractive and inclusive workplace, focus on HSE at all levels, be part of the digital transformation, adopt new technology and have an ambitious sustainability strategy.

Table 1 provides an overview of the Thon Group's sustainability-related targets from the group's sustainability strategy. As a real estate company, the group impacts the climate, nature, society and social conditions through, among other things, acquiring, developing, owning and operating property, as well as through workplaces, procurement and investments.

Investing in real estate with development potential creates an opportunity to adapt properties to meet future requirements in a sustainable future. In the short term, this may result in increased costs and investments, but in the longer term, is expected to contribute to increased tenant satisfaction, better customer experiences and safeguarding the group's strong financial position. The challenge lies in identifying the right properties and actions for investment, while meeting customer desires and needs. It is important to find solutions that have both a positive sustainability effect and align with customer wishes and goals.

The rental of properties entails frequent tenant changes, which often involves renovating and adapting the premises to meet the needs of new tenants. In this process, it is mainly the tenant who specifies the design requirements.

In the case of tenant adaptations, the group's most significant opportunity to influence is related to waste management in the construction process. The group's sustainability goals are therefore primarily aimed at the development, operation and maintenance of the properties, with particular emphasis on actions that contribute to reduced energy consumption and emission cuts, facilitation of waste sorting for tenants, customers and hotel guests, responsible procurement and an inclusive workplace for employees.

Business model and value chain




The group's business model is based on the purchase, construction, development and leasing of real estate, hotel and restaurant operations. The value chain is complex, broad and varied, and covers the entire process, from the acquisition of real estate to the development and operation of the properties.

Upstream activities include both the acquisition of real estate and procurement of services and building materials to develop and operate the properties. This encompasses everything from raw materials being extracted from nature to a product being delivered to the group's properties. There are different degrees of processing of the raw materials in our value chain and therefore also different complexities and lengths of supply chains. In some cases, only simple processing is required before they are developed into the product delivered to us. In other cases, there are numerous processing stages of the raw material before it can be converted into a product. There may also be many stages in the assembly phase of production. The group often uses a turnkey contractor, who procures both services and building materials for the projects.

Own operations include the development, renovation and operation of properties. The property portfolio largely consists of shopping centres, commercial properties, hotels and residential properties. A continuous effort is made to attract solid tenants through trust and the adaptation of premises. The hotel business mainly consists of accommodations, catering and conference facilities, and focuses on creating a positive visitor experience for guests. Efficient operations, including maintenance, and a focus on the hotel guest experience and tenant satisfaction help to create long-term value for both the group and tenants.

The group's closest and most important downstream players are tenants and hotel guests. In addition, the tenants' customers, shopping centre customers, are also important stakeholders downstream in the value chain. As a strong real estate company, the group contributes to value creation for society in general through property and urban development, excellent customer experiences at shopping centres and central office premises for the business community.

TABLE 1: Overview of the Thon Group's sustainability strategy

Pillar	Material topics	Targets	Ambition
 Climate and nature	Transition to a low-emissions society	60% reduction in own emissions (Scopes 1 and 2) by the end of 2030	Net zero by 2050
	Climate impact	Report climate risk in accordance with TCFD by 2025	Net zero by 2050
	Customer preferences	70% of all food and drink must be locally sourced by 2030	Nature-positive
	Conservation of natural resources and biodiversity	Green areas on 60% of existing properties by the end of 2030	Nature-positive
 Circular solutions	Circular habits	70% sorting rate at hotels and shopping centres by 2030	70% circular by 2030
	Circular buildings	Reuse rate in construction projects in line with the EU Taxonomy for climate (90%) by 2030	70% circular by 2030
 Social justice	Inclusive workplace	40% of each gender overall and on management levels 1-3 by 2030	Representative management
	Human rights and transparency	Report on transparency, diversity and inclusion from 2027	Full insight into value chain
	Responsible business practices in value chain	Supply chain mapping for 100% of product categories by the end of 2030	Full insight into value chain

INTERESTS AND VIEWS OF STAKEHOLDERS

ESRS 2 SBM-2

The following stakeholder categories have been identified based on the Thon Group's stakeholder assessment: employees, the financial sector, tenants, hotel guests, end users, government agencies, suppliers and local communities.

Supplier surveys and dialogue with both employees and external stakeholders on a regular basis throughout the year have helped to identify what is important to them in terms of sustainability. Among other things, sustainability and human rights due diligence assessments were included on the agenda during supplier meetings in 2024. The goal has been to learn more about the supplier's sustainability work and work with the Transparency Act, and to create a relationship for good collaboration in the future.

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

ESRS 2 SBM-3

The group's material impacts, risks and opportunities are based on a double materiality assessment carried out in line with the process described in the chapter entitled 'Impacts, risks and opportunities' on page 7. As a result of the assessment, the group has developed a sustainability strategy.

Table 1 shows the material topics covered by the strategy, as identified through this process. The topics are based on three pillars: climate and nature, circular solutions and social justice, with associated long-term ambitions. For each topic, specific targets have been set to support the ambitions. The following chapters provide a more detailed account of each topic, including associated

impacts, risks and opportunities. Also described are the definition and scope of the topics and their relation to the group's business and value chain.

The Thon Group's overall goal is to have a common system for the group's sustainability efforts. The sustainability strategy has helped the group to systematise and operationalise its sustainability efforts. To ensure a correct, relevant and good flow of information, the system is communicated through the group's sustainability handbook. The sustainability strategy has enhanced integration between sustainability efforts and the group's

business areas. The importance of sustainability has become more prominent at every stage of the business. The various specialist departments and operating units have been given a clearer role in sustainability efforts and held more accountable.

The group is expected to continue to undergo a number of changes in order to achieve the targets in the strategy, particularly with regard to procedures and processes. It takes time to adapt, so we also have a long-term perspective on the group's sustainability efforts and system.

Impacts, risks and opportunities

This chapter describes the process for identifying the material impacts, risks and opportunities that form the basis for the Thon Group's sustainability reporting.

PROCESS FOR IDENTIFYING AND ASSESSING MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

ESRS 2 IRO-1

In 2022, the Thon Group conducted a double materiality assessment to identify and assess the most relevant topics for the group. The assessment consisted of two main components: an impact assessment and a stakeholder and megatrend assessment. The results form the basis for the group's sustainability strategy, which serves as a guide for sustainability efforts through to 2030.

Impact assessment

Table 2 illustrates the company's potential impact on climate, the environment and people throughout the value chain, differentiated by positive or negative impact and degree of impact (high or medium). The impact assessment examines the group's impact on the climate, environment and people through its operations. A mapping was carried out of all group business areas, both core activities and more peripheral activities. An impact assessment of the entire value chain was carried out for the most material business areas (properties, hotels and shopping centres).

The impacts were grouped into two main categories: climate & environment and people. The categories were then grouped into sub-categories, inspired by relevant frameworks, such as GRI¹, SASB², TNFD³ and WEF⁴, to structure their impacts.

Relevant documents, such as the sustainability report, carbon accounting report, waste reports, spend reports, supplier surveys, policies and guidelines, were reviewed to identify various impacts the group has on the climate, environment and people. As part of the impact assessment, a literature assessment was carried out by sector supervisors, similar companies and others at the same sector level to identify potential impacts in the value chain. A sector assessment was carried out based on an overview from SASB and TNFD of topics that are relevant to the respective sectors in which we operate.

The identified impacts were discussed with a reference group representing all specialist and business areas in the company. The reference group also had the opportunity to provide input on other influences that may not have been identified. This was done through interviews.

Impact was assessed as either high, medium or low and in a negative or positive sense using both a qualitative and quantitative approach. Most data was available in the part of the value chain that covers the company's own activities. Upstream and downstream were therefore largely based on general information about the sector, reports and assumptions. This was done in an attempt to create a picture of the entire value chain. The impacts and occurrence of impacts were considered in relation

1 Global Reporting Initiative; 2 Sustainability Accounting Standards Board; 3 Taskforce on Nature-related Financial Disclosures; 4 World Economic Forum.

TABLE 3: STAKEHOLDER ASSESSMENT

Stakeholders	Views and interests
EMPLOYEES	The employees are very important to the group, as their competence and engagement is essential for achieving results. Young applicants and employees are finding sustainable companies increasingly attractive. In addition, expectations for an inclusive workplace, skills development and development opportunities are becoming increasingly higher.
FINANCIAL SECTOR	Dependence on the financial sector to finance the business. Investors and banks have a growing interest in sustainability and are introducing information and reporting requirements. The EU Taxonomy is an example of how financing conditions can be linked to documented sustainability activities.
TENANTS, GUESTS AND END USERS	There has been a change in preferences and an increase in awareness among the group's end users, tenants and hotel guests in terms of sustainability requirements. End users want complete product information, evidenced by the implementation of the Norwegian Transparency Act. Surveys also show that location is no longer the most important factor for commercial property tenants. There are also more people who are interested in climate-neutral travel and hotel guests are increasingly demanding environmental profiles at hotels.
SUPPLIERS	More openness and transparency in the supply chains make actual conditions in the value chain more visible. Production workers gain a louder voice and suppliers are more able to demand fair pricing for their products. Technological development and the digitisation of trade are also increasing traceability in the value chain, and consequently transparency.
AUTHORITIES	With the increase in requirements for waste management, circularity, emission cuts, openness, transparency and so on, authorities are holding companies increasingly accountable for sustainability. There has been a constant stream of new requirements for information and reporting, as well as sustainable activities.
LOCAL COMMUNITIES	Through the development and operation of properties and hotels, the group has a significant presence in local communities. This creates expectations for contributions to good local environments and urban spaces, low pollution and general consideration of the surroundings. There is also a strong focus on how companies impact indigenous peoples and minorities.

to group operations and revenue. The assessment of the impacts was discussed and established through interviews with the reference group, as well as the group's executive management.

Stakeholder and megatrend assessment

A stakeholder assessment was conducted through a desktop assessment to identify the expectations of group stakeholders in terms of our sustainability efforts. The results of the stakeholder assessment, together with insights from interviews with employees who have direct contact with different stakeholders, have contributed to the assessment of how people, society and the environment impact the company. Table 3 provides an overview of the results of the stakeholder assessment.

In 2025, dialogue will be conducted with the group's internal and key external stakeholders in connection with an update of the double materiality assessment.

A megatrend assessment has been carried out to provide an overview of the Thon Group's risks and opportunities in relation to key megatrends. Five relevant megatrends were identified: climate change, transition to a circular economy, transition to the conservation of nature and biodiversity, digital transformation and transition to social

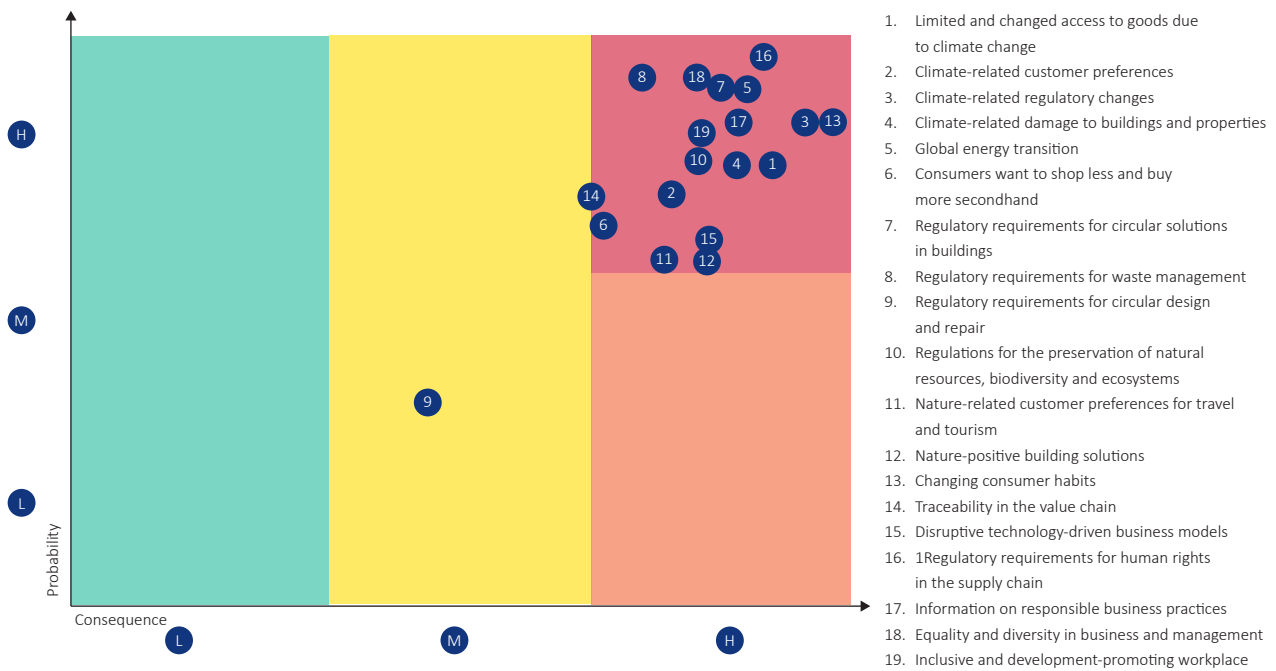
justice. These were analysed in relation to three different transition scenarios: fast, slow and no transition. Furthermore, the group's material risks and opportunities in relation to the megatrends were identified through interviews with a reference group. Workshops were held in which all business and specialist areas were represented. During these workshops, risks and opportunities were assessed as having a low, medium or high impact, and probability based on the different transition scenarios.

After the workshops, it became clear that all risks and opportunities were considered important. An assessment was therefore made in which the various topics were evaluated for relevance and materiality in relation to group operations.

Figure 1 illustrates the company's identified risks and opportunities based on the stakeholder and megatrend assessment. These are mainly related to social, customer-related and regulatory changes within climate, nature, circular solutions and social matters in our own operations and throughout the value chain.

See the document 'Double materiality assessment' at thon.no for more details.

FIGURE 1: Megatrend assessment



Result

Based on workshops and interviews in the reference group, as well as the group's executive management, nine material topics were defined within the three pillars, which constitute the group's sustainability strategy. The sustainability strategy is anchored in the board of Thon Gruppen AS and applies to all businesses in the company. The strategy was adopted by the board in June 2022 and was launched in the second half of 2022.

The group's double materiality assessment will be updated in 2025 in accordance with the requirements of the ESRS

framework. This is done both to ensure reporting in line with current legislation and to update the assessment after three years of application.

In connection with the update, the group will also review governing documents related to sustainability. Policies, guidelines, action plans and procedures will be revised, updated, prepared or discontinued to strengthen the systematisation of sustainability efforts in accordance with the ESRS framework.



Environment

This chapter deals with the pillars, climate and nature, and circular solutions from the group's sustainability strategy. The Thon Group's material topics within these pillars are mapped against, and structured according to, the environmental categories of the ESRS framework.






TABLE 4: CLIMATE					 11 CLIMATE-RELATED DISCLOSURES	 7 ADDITIONAL CLIMATE-RELATED DISCLOSURES	 13 CLIMATE RISK
2023	2025	2027	2030				
Transition to a low carbon society (E1 – Climate change)							
		Establish STB ⁵ for own emissions and define a baseline	Reduce emissions in Scopes 1 and 2 by 45%	Reduce emissions in Scopes 1 and 2 by 60%			
Emissions-free construction sites in Oslo ⁶			50% of construction sites in Norway must be emission-free	All construction sites in Norway must be emission-free			
30% of renovation according to the EU taxonomy for climate		45% of renovations in accordance with the taxonomy	60% of renovations in accordance with the taxonomy	100% of renovations in accordance with the taxonomy			
EV charging at all shopping centres							
All new buildings must have energy label A							
Map renewable production at properties							
		All new builds must be BREEAM NOR Very Good or equivalent					
			All new builds in accordance with the EU taxonomy criteria for climate				
		15% of shopping centres and hotels must achieve at least BREEAM In-Use Very Good rating	30% of shopping centres and hotels must be at least BREEAM In-use Very Good	60% of shopping centres and hotels must be at least BREEAM In-use Very Good			
		10% of existing buildings must be BREEAM In-Use certified	25% of existing buildings must be BREEAM In-Use certified	50% of existing buildings must be BREEAM In-Use certified			
Climate impact (E1 – Climate change)							
Map climate risk in own operations		Report climate risk in accordance with TCFD framework					
Include questions in communications with suppliers							
					Net zero by 2050		



TABLE 5: NATURE



2023	2025	2027	2030
Customer preferences (E1 – Climate change and E4 – Biodiversity and ecosystems)			
20% of all food and drink must be Norwegian	✓	40% of all food and drink must be Norwegian	50% of all food and drink must be Norwegian
Vegetarian and vegan options at all hotels and restaurants	✓		70% of all food and drink must be Norwegian
Conservation of natural resources and biodiversity (E4 – Biodiversity and ecosystems)			
	Conduct an impact assessment on 50% of development projects	Conduct an impact assessment of all development projects	
Green areas/pocket forests for all new buildings	✓		
Set requirements for suppliers relating to impact on biodiversity and nature	→		
Develop green areas, roofs and walls at 10% of existing properties	→	Develop green areas, roofs and walls at 20% of existing properties	Develop green areas, roofs and walls at 30% of existing properties

Nature-positive



TABLE 6: CIRCULAR SOLUTIONS



2023	2025	2027	2030
Circular habits (E5 – Resource use and circular economy)			
Set specific targets and expand the area of use for Thon Gjenbruk	→		
Expand waste management projects to 15% of shopping centres	→	Expand waste management projects to 50% of shopping centres	Expand waste management projects to all shopping centres
Require tenants to commit to a 60% sorting rate	✓	Require tenants to commit to a 65% sorting rate	Require tenants to commit to a 70% sorting rate
25% cut in food waste	✓	30% cut in food waste	40% cut in food waste
Establish a working group to map upcoming requirements for circular solutions in construction	✓		50% cut in food waste
Include in the project design phase that opportunities related to reuse for building materials have been explored	✓		
Require that the reuse rate of non-hazardous waste in construction projects is in line with the EU taxonomy for climate (70%)	✓	Require that the reuse rate of non-hazardous waste in construction projects is in line with the EU taxonomy for climate	Reuse rate of non-hazardous waste in construction projects is in line with the EU taxonomy for climate
Map current and potential use of recycled materials in construction projects	✓	Establish requirements for the percentage of reused materials according to the EU taxonomy for circular economy (30%)	Percentage of reused materials in line with the EU taxonomy for circular economy (30%)

70% circular

5 Science Based Target

6 Construction sites must be emissions-free in line with the municipality of Oslo's guidelines for emissions-free and fossil-free construction sites. In some cases, deviations may occur due to limited access to emissions-free construction equipment in the supply chain. In such cases, the construction site must be fossil-free as a minimum.

Transition to a low carbon society and climate risk

E1 Climate change

Transition to a low carbon society and climate risk are included in the ESRS standard E1 Climate change. This chapter describes the group's efforts in relation to climate change, including greenhouse gas emissions, energy and climate risk.

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

ESRS 2 SBM-3

The Thon Group contributes to climate change through its greenhouse gas emissions in both its own operations and in the upstream and downstream value chain. These emissions are related to the extraction, production and transportation of goods in the upstream value chain, energy consumption from operations, maintenance and renovation in our own operations and waste in the downstream value chain. Emissions from the value chain can contribute to local pollution and global warming, which in turn can lead to climate-related health issues or a shortage of raw materials due to climate change.

There is also a general physical risk in the real estate industry linked to extreme weather events that can result in damage to buildings and infrastructure. Among other things, snow melt, rainfall and more precipitation can lead to an increased risk of flooding, which in turn can cause major damage to buildings. The risk of climate-related damage to buildings can result in increased costs for upgrades and renovations to reduce exposure and prepare for potential future climate damage. Transition risks and opportunities related to the market and regulations are most relevant in the short term, while physical climate risks are more material in the long term.

Physical risks

Out of the potential physical climate risks, the group can be particularly exposed to extreme precipitation, snowfall, flooding and extreme winds under a high-emissions scenario. The risk of climate events related to snow has increased compared to historical exposure, but is expected to decrease in the long term under a future high-emissions scenario. On the other hand, the risk of forest fires increases significantly in a high-emissions scenario and can affect up to 70% of properties. The assessment is based on the geographical area only and does not take into account the condition of the property or quality of the building.

Assessments have been carried out per property for the risk areas, but the group has not quantified the financial effect of the risk identified. At the time of the presentation of the financial statements, no climate risks have been identified that will have an effect on the accounting, so climate risks are therefore not taken into account in determining real value.

Transition risk

Apart from physical risks, this may result in increased costs associated with insurance policies and building insurance. Suppliers of raw materials and raw material producers may be affected by climate change through droughts, floods or water shortages, which may change the industry's access to raw materials. Different types of raw materials may also be at risk of becoming depleted. This can result in reduced access and increased price fluctuations. The group has also seen an increase in climate-related legislation introduced in recent years. It is important for the group to comply with these laws in a proper and appropriate manner, and increased efforts to reduce climate emissions are an important means of doing so.

By mapping both transition risks and physical risks, the group can adapt its operations to better manage potential challenges. This work not only contributes to increased preparedness, but can also uncover new business opportunities that strengthen the group's long-term sustainability and competitiveness.

IDENTIFICATION AND ASSESSMENT PROCESS

ESRS 2 IRO-1

Climate risk mapping

Based on the findings of the double materiality assessment, the group conducted an overall climate risk project to identify exposure to climate-related risks and opportunities in the real estate portfolio. The project was carried out in 2023 and based on the Task Force on Climate-related Financial Disclosures (TCFD) framework. The purpose of the project was to carry out an overall mapping in order to identify exposure to risks and opportunities associated with the group's various business areas.

These included a desktop assessment of low-emissions scenarios (RCP2.6) and high-emissions scenarios (RCP8.5). Interviews were also conducted with representatives from various specialist areas in the company to gain insight into internal stakeholders' assessments of climate exposure, risks and opportunities.

Identified risks and opportunities were assessed using the company's existing framework for assessment of both physical climate risk and transition risk. A practical and qualitative methodology was used to prioritise climate exposure in the medium and long terms.

In addition, a climate assessment tool was used to assess the group's property exposure to various physical climate risks. The tool assesses the vulnerability of properties based on factors such as geographical location, sector and energy consumption, and uses recognised research models from the Intergovernmental Panel on Climate Change (IPCC) to evaluate climate risk. Each property is assigned a risk value from very low to very high based on predicted values for relevant indicators.

The assessment was carried out within the scenarios RCP4.5 (moderate transition) and RCP8.6 (slower transition), with time horizons for 2030, 2040 and 2050. The assessed climate events include drought, extreme precipitation, storm, forest fire, sea level rise, flood and snow.

In 2024, the assessment was updated to include additional relevant risks from Appendix A in the Taxonomy, including cold waves and heat waves, as well as geotechnical risks. The update is based on the latest climate model, CMIP6, which was also used by the IPCC in their 2023 report. The year's results show that the company's properties are most exposed to extreme precipitation, snowfall, flooding and extreme winds, based on a high-emissions scenario.

The results of the assessment form the basis for further assessments of the group's properties and their vulnerability to climate-related risks, so that any physical risks can be managed proactively.

CLIMATE TRANSITION PLAN AND GUIDELINES

E1-1 and E1-2

Climate change, including greenhouse gas emissions and climate risk, is integrated into the group's sustainability policy and strategy, with associated roadmaps and set targets. At present, no transition plan, own strategy or specific guidelines have been developed for efforts related to greenhouse gas emissions and climate risk. The need for this will be assessed in connection with the updated double materiality assessment in 2025 and the application for the Science Based Target initiative (SBTi).

ACTIONS RELATED TO CLIMATE CHANGE

E1-3 and MRD-A

An action plan is prepared annually for the Thon Group's sustainability efforts, in line with the sustainability strategy's targets and prioritised activities. Responsibility for implementation is divided among the relevant specialist and business areas. In light of the planned update of the group's double materiality assessment in 2025, adjustments are expected to both the strategy and action plan. To ensure reporting in accordance with next year's ESRS, opportunities for more comprehensive action plans are also being considered, including any specific action plans per topic.

Table 7 on page 14 provides a summary of actions planned, initiated or completed during 2024.

Energy

The Thon Group works systematically with energy to reduce its negative impact on the climate and environment. The sustainability strategy focuses on energy reduction and increased consumption of renewable energy. There is also a focus on energy management through awareness-raising, training and increased expertise. These activities are monitored by the Property Services department, which has overall responsibility for activities related to energy and environmental management, energy and technical advice, as well as energy optimisation. Energy-reducing activities are included in the daily technical property operations at the properties.

Four focus areas have been defined within the energy activities to help the group achieve its targets for reducing emissions: energy management, maintenance, energy-saving actions and renewable energy. The type of energy used at the properties is also material for the carbon accounting report. The Thon Group therefore wants to invest more in renewable energy and efforts are currently being made to map the opportunities.

Efforts are also being made to standardise energy-saving actions, such as quantity regulation, variable air quantities and lighting control, and to develop smart control systems, such as snow melting and various other standardised and location-adapted actions.

Climate risk

In 2024, a climate risk survey was carried out on the group's properties with the highest exposure to climate risk. The purpose of the survey was to assess the actual situation and confirm or clarify the climate risks identified through the assessment. The results will form the basis for any action plans to manage and reduce relevant risks.

TARGETS RELATED TO CLIMATE CHANGE

E1-4 and MRD-T

An overview of the current targets is presented on page 10 under the climate and nature pillar and gives a complete picture of the Thon Group's climate targets. In addition, targets aimed at reducing emissions are shown in Table 9 on page 15. In light of the updated sustainability strategy and application to the SBTi, it is expected that there will be a need to adjust the targets. The ambition level must nevertheless be maintained.

The targets to reduce greenhouse gas emissions are set in absolute values and only apply to location-based emissions. At present, the targets for the group's total emissions in Scopes 1 and 2 apply. As part of the application for the SBTi, a target for Scope 3 will also be established by the end of 2025.

The set targets reflect a desire to raise the group's level of ambition in terms of sustainability by exceeding the expectations of the authorities and market, without necessarily taking on a pioneering role.

TABLE 7: ACTIONS RELATED TO CLIMATE CHANGE AND CLIMATE RISK

Activities in the action plan	Status
<ul style="list-style-type: none"> Set science-based targets for own emissions and define baseline 	Ongoing: Waiting for a new greenhouse gas accounting system in order to provide a better basis for the application. To be implemented in 2025.
<ul style="list-style-type: none"> Expand scope for requirements for emissions-free construction sites 	Completed.
<ul style="list-style-type: none"> Continue to establish EV charging stations at all hotels and shopping centres with parking 	Completed.
<ul style="list-style-type: none"> Prepare requirements specifications for newbuilds in accordance with EU Taxonomy climate criteria 	Completed: Included in the environmental programme for newbuilds.
<ul style="list-style-type: none"> Continue BREEAM In-use certification 	Completed.
<ul style="list-style-type: none"> Prepare reporting on climate risk in accordance with TCFD 	Discontinued: Climate risk reporting is taken into account in the company's annual sustainability reporting in accordance with ESRS.
<ul style="list-style-type: none"> Purchase in line with Norwegian food and drink targets 	Completed.

Although the targets are not directly based on science-based scenarios, they are developed in the expectation that the European energy market will undergo a green transition. Moreover, they are set slightly above the political targets of Norway and the EU, both of which aim to reduce emissions by 55% by 2030.

Due to the extensive manual processes involved in preparing the carbon accounting report, greenhouse gas emissions are currently only reported annually. This means that progress and results are assessed once a year. In 2025, the group will assess modern solutions for more continuous monitoring of emissions throughout the year. At the same time, detailed energy data from our majority-owned properties in Norway and Sweden, with near real-time updates, provides an opportunity for ongoing follow-up.

By 2027, the Thon Group aims to reduce Scope 1 and 2 greenhouse gas emissions by 45%. Compared to the reference year, emissions have already been reduced by 44%, indicating that the group is well positioned to achieve this target.

ENERGY CONSUMPTION AND ENERGY MIX

E1-5

The Thon Group's emissions related to its own operations are primarily the result of energy consumption at the properties and electricity use in particular. As a real estate company, energy has therefore been an important topic for the group. The focus is on energy management and energy reduction through the group's Property Services department, which works systematically to reduce emissions related to energy.

The group's energy mix is reported as fossil energy consumption. Over 80% of all energy consumption originates from purchased electricity, heating and cooling

for our properties. Norway in particular has considerable hydropower and therefore a large share of renewable energy in the energy mix. As we do not purchase guarantees of origin or similar instruments, we cannot report this as renewable energy.

Crude oil and petroleum products mainly consist of gas consumption at the hotels, primarily for heating in Belgium and the Netherlands, as well as some gas and heating oil for production at Unger Fabrikker and Follo Fjernvarme. The group's renewable sources originate from wood pellets, which are also used for production at Follo Fjernvarme.

Trends in recent years show a clear decline in the group's energy consumption and therefore also emissions in Scopes 1 and 2. In 2024, however, we saw a minor increase in energy consumption of 2% compared to the previous year. This increase relates to purchased energy, which has risen by 5%. Compared to the reference year of 2019, we still see a downward trend, with a reduction of 13% in 2024.

Consumption of fossil energy sources under crude oil and petroleum products has decreased by 36% compared to the previous year and by 70% compared to 2019. We consider this a positive development away from fossil energy sources.

See Table 8 on page 14 for an overview of the company's energy consumption.

GROSS SCOPE 1, 2 AND 3 GHG EMISSIONS AND TOTAL GHG EMISSIONS

E1-6 and BP-2

The Thon Group prepares annual greenhouse gas accounts in accordance with the GHG protocol. The emissions factors used are collected from the IPCC (AR4). The carbon

TABLE 8: ENERGY CONSUMPTION AND MIX (E1-5)

Energy source	Reference year 2019	Previous year 2023	Status 2024	Change from 2019	Change from 2023
Coal and coal products	-	-	-	-	-
Crude oil and petroleum products	23,109	10,782	6,923	-70%	-36%
Natural gas	14,134	10,395	10,278	-27%	-1%
Other fossil fuels	-	-	-	-	-
Purchased or acquired electricity, heat, steam and cooling from non-renewable sources	421,205	354,630	371,450	-12%	5%
Total fossil energy consumption	458,448	375,807	388,651	-16%	3%
Percentage of fossil sources in total energy consumption	97%	93%	95%		
Consumption from nuclear sources	-	-	-	-	-
Percentage of nuclear sources in total energy consumption	0%	0%	0%	0%	0%
Renewable sources, including biomass	15,337	28,352	22,176	45%	-22%
Purchased or acquired electricity, heat, steam and cooling from renewable sources	-	-	-	-	-
Consumption of self-produced renewable energy	-	-	-	-	-
Total consumption of renewable energy	15,337	28,352	22,176	45%	-22%
Percentage of renewable sources in total energy consumption	3%	7%	5%	0%	0%
Total energy consumption	473,784	404,159	410,827	-19%	2%

TABLE 9: GREENHOUSE GAS EMISSIONS (E1-4 and E1-6)

Emissions	Reference year 2019	Comparison	Status 2024	Change in last year	Target 2027	Target 2030	Target 2050
Scope 1 gross	8,617	-53%	3,989	-18%	-45%	-60%	Net zero
Percentage from regulated trading schemes for emissions allowances	0%	0%	0%	0%			
Transport	389	-34%	259	-18%			
Stationary incineration	8,128	-54%	3,730	-18%			
Scope 2 gross (location-based)	16,068	-39%	9,831	5%			
Electricity (location-based)	14,180	-40%	8,460	2%	-45%	-60%	
District heating (location-based)	1,562	-17%	1,299	28%			
District cooling (location-based)	326	-78%	72	-3%			
Scope 2 gross (market-based)	67,971	57%	106,767	21%			
Scope 3 gross	45,429	-25%	33,893	-7%			
Fuel and energy	12,365	-59%	5,072	-38%			
Waste	7,687	-1%	7,585	-9%			
Business travel	668	-18%	546	-17%			
Employee commuting	1,005	6%	1,070	-14%			
Leased assets	23,704	-20%	18,969	5%			
Franchise	466	40%	651	93%			
Total emissions (location-based)	70,014	-32%	47,713	-6%	-45%	-60%	
Total emissions of Scopes 1+2 (location-based)	24,585	-44%	13,820	-3%			
Total emissions (market-based)	121,917	19%	144,649	11%			

accounting report is prepared for each calendar year – in this report for 2024. All of the Thon Group's majority-owned properties are included. The most material emissions in Scopes 1, 2 and 3 are reported. Table 9 on page 14 provides an overview of the group's emissions, changes in emissions over time and the group's targets related to emissions.

Experience shows that achieving sufficient data quality can be time-consuming. We therefore work continuously to improve the quality of the data collected, so that it remains at a high level at all times and provides a reliable basis for further sustainability efforts. This may affect the result from year to year and may lead to the need to correct the previous year's results(*). See the appendix on page 34 for more details regarding data sources.

Scopes 1 and 2

The data in Scopes 1 and 2 is activity data (specific consumption) from the supplier of petrol and diesel and from the energy meters at the properties. This does not include energy meters owned by our tenants, only joint consumption at the properties and from the group's own operations.

As the purchased energy consumption has increased, the emissions in the location-based emissions in Scope 2 also show an increase in the amount of 5%. Similarly, reduced consumption of fossil energy sources has resulted in a decrease in Scope 1 emissions of 18% during the same period.

The increase in market-based emissions in Scope 2 is due to changes in the residual mix, which reflects the energy mix after deducting renewable energy purchased with guarantees of origin. When more parties buy such guarantees, the proportion of non-renewable energy in the residual mix increases, making it more carbon-intensive. In addition, increased use of fossil energy sources can generally raise emission factors. Both factors contribute to higher market-based emissions for buyers without guarantees of origin.

The results for targets set for reducing Scope 1 and 2 emissions show that the group is still well positioned to achieve the targets in 2027 and 2030. The reduction in Scope 1 and 2 emissions of 44% compared to the reference year of 2019 is a slightly stronger result than the previous year (42% in 2023), despite slightly higher energy consumption in 2024 compared to 2023. Emissions from fossil sources (Scope 1), on the other hand, have been reduced by 53%. This corresponds to lower consumption of crude oil and petroleum products, as well as natural gas.

Scope 3

Scope 3 has a greater variation between activity data and spend data (financial data). Fuel and energy-related activities are based on the same data as Scopes 1 and 2. Business travel is activity data collected directly from the company's travel agency.

Waste data is largely collected directly from waste disposal providers in Norway and Sweden, which ensures a high quality of aggregated data. However, the treatment method per waste fraction has been mapped manually, resulting in some uncertainty in the calculated emissions from waste treatment. This is because the same waste fraction can be handled differently at different waste disposal plants, while the data assumes one treatment method per fraction. Waste includes waste from the properties' own operations, tenant operations and shopping centre customers. In addition, we manually collect waste data from externally managed companies such as Unger Fabrikker and Follo Fjernvarme, as well as our hotels in Belgium and the Netherlands. Emissions related to waste have been reduced by 9% compared to the previous year. This corresponds to an increased amount of waste being sent for recycling.

For employee commuting, calculations have been made based on the number of man-years in the group, the national average distance between home and workplace and a national distribution of modes of transport used to commute. The estimate makes it challenging to work strategically to reduce emissions related to employee commuting.

Leased assets include the tenants' energy consumption at the group's properties. This is currently based on estimated consumption data per square metre, as the group does not have access to specific data. At present, this constitutes the group's largest emissions category within Scope 3. The group wishes to collect specific activity data from the properties and tenants to enable more precise calculations and facilitate cooperation on reducing emissions to help achieve the targets in Scope 3 once they have been set. In 2024, emissions in this category increased by 5% compared to the previous year. This is probably due to an increase in the number of square metres rented out in 2024.

In addition, purchased goods and services, as well as capital goods, are relevant Scope 3 categories for the group. However, challenges in collecting data mean that these cannot be reported for 2024. As part of the SBTi application, a solution will be established by the end of 2025 and it is expected that all material categories will be included in next year's reporting.

Conservation of natural resources and biodiversity

E4 Biodiversity and ecosystems

Awareness of the impact of property development on nature is increasing and the conservation of nature and biodiversity is gaining increasing attention through international agreements and national legislation. As a result, the conservation of natural resources and biodiversity are considered a material topic for the group.

IMPACTS, RISKS AND OPPORTUNITIES

E4-1 and ESRS 2 SBM-3

Most of the Thon Group's properties are located in already built-up areas. But the group still has a significant impact on nature and biodiversity – and vice versa. The extent of this impact largely depends on how the properties are managed and developed. In urban areas, there are significant opportunities to boost the positive impact on nature and biodiversity through targeted actions.

A detailed robustness analysis of the Thon Group's strategy and business model with regard to biodiversity and ecosystems has not yet been carried out. No material risks related to this topic have therefore been identified at a general level.

Transition risk

The conservation of natural resources and biodiversity is increasingly in the spotlight, both on the part of authorities and society in general. This can result in increased development costs, as nature-positive solutions need to be integrated to a greater extent. Furthermore, changes in regulations may affect the supply chain, such as through price increases for materials as a result of forest conservation or restrictions on the import of timber. At the same time, financial institutions and investors are setting increasingly stricter requirements for sustainability reporting and green financing, reinforcing the need for a holistic approach to nature and climate risk.

Opportunities

Solutions that contribute to nature and biodiversity, such as the establishment of green areas, pocket forests and planted roofs and facades, the establishment of birdhouses, insect hotels and bat boxes, etc. can both protect properties from the effects of nature and help conserve ecosystems. Such actions also have positive effects on the local community, as vegetation improves air quality and promotes health and well-being of residents, customers and visitors.

IDENTIFICATION AND ASSESSMENT PROCESS

ESRS 2 IRO-1

See the 'Process for identifying and assessing material impacts, risks and opportunities' on page 7 for how

this was carried out as part of the double materiality assessment.

Nature risk assessment

In 2024, a nature risk project was carried out to identify the Thon Group's assets and interface with vulnerable nature. The project was based on the LEAP (Locate, Evaluate, Assess and Prepare) methodology from the Taskforce on Nature-related Financial Disclosures (TNFD). Through the assessment, we located where our properties may have cross-overs with vulnerable nature.

A nature risk tool was used that is based on nature-related map layers with Norwegian and global coverage. Based on coordinators, it performs an automated geographical assessment of a large number of properties to assess the nature sensitivity and prioritisation of locations. To ensure that the entire potential area of influence of the assets is captured, we used buffer zones. These are set at one and three kilometres, together with a direct point of impact at zero kilometres.

An overall sensitivity assessment is used to map prioritised assets. This is calculated from points of impact with prioritised natural areas in which the different areas are weighted differently.

Properties in or near sensitive areas

The assessment identified that the company has two properties with direct touch points with the protected area. These properties border on a unique protected area. In addition, 240 of the group's properties are located within a three-kilometre radius of a protected area and may therefore have a potential impact on these areas. This includes 51 unique protected areas.

In addition, one of the group's properties has a point of impact with a KBA (Key Biodiversity Area – globally prioritised nature) and 240 of the group's properties are located within a radius of three kilometres from a KBA. The areas of influence include 14 unique KBAs.

A total of 22 properties with a direct point of impact with an ecological climate corridor and 47 properties within a radius of three kilometres from an ecological climate corridor were also identified.

TABLE 10: ACTIONS RELATED TO CONSERVATION OF NATURAL RESOURCES AND BIODIVERSITY

Activities in the action plan	Status
<ul style="list-style-type: none"> Develop and establish a concept for green areas for all newbuilds Establish a concept for green areas at the group's existing properties Establish procedures for implementing a nature impact assessment in all construction projects 	<p>Completed.</p> <p>Completed: Prepare requirements specifications in collaboration with ecologist.</p> <p>Completed: Defined method in the environmental programme for newbuilds. Use the BREEAM NOR method if the building is to be BREEAM certified.</p>

Individual assessments per property have not yet been carried out to determine the actual impact of our activities in these areas. It is therefore too early to draw conclusions about concrete impacts, risks or opportunities.

The purpose of the assessment was to provide an overall overview of areas where the group could potentially have a negative impact and thereby identify which aspects should be considered more closely in further work.

Water availability

Water availability is assessed based on the ratio between water withdrawal in an area and the annual inflow from surface and groundwater. The assessment indicates that four of the group's properties are located in an area with very limited water resources north of Stockholm, Sweden. In addition, the assessment shows that areas around Oslo have more challenges related to water availability than the rest of Norway, but this risk is considered to be low to moderate. At present, a risk of such magnitude has not been identified that it has been necessary to take specific actions.

GUIDELINES FOR NATURE

E4-2 and MDR-P

Natural resources and biodiversity are integrated into the group's sustainability policy and strategy, with corresponding roadmaps and set targets. No separate strategy or specific guidelines have been developed yet for this, but this will be considered in connection with the updated double materiality assessment in 2025.

ACTIONS AND TARGETS RELATED TO NATURE

E4-3 and E4-4

Targets, actions and activities related to nature and biodiversity are set out in the group's sustainability strategy and annual sustainability action plan. Responsibilities are assigned to different disciplines and business areas. All actions and targets encompass all the group's properties and KPIs are set based on this. Table 5 on page 11 provides an overview of targets related to the conservation of natural resources and biodiversity. Table 10 shows an overview of actions from 2024.

Green areas

In order to strengthen the group's positive contribution to nature and biodiversity, increased emphasis is placed on establishing green areas on the properties. This means that all new construction projects must take natural and biodiversity into account by facilitating green spaces. To ensure this, specific requirements have been incorporated into the requirements specifications for turnkey contractors.

The Thon Group is also working to establish green areas around existing buildings, but this has proven to be more challenging. Many buildings have limited load-bearing capacity in the roof, making them unsuitable for green roofs. In addition, a significant percentage of the property portfolio is located in urban areas, where the possibilities for ground-level green areas are limited.

With older city buildings, challenges can include reduced roof load-bearing capacity, pitched roofs and limited available space. In addition, there is often a trade-off between different sustainability actions, such as whether green roofs and green areas should be prioritised rather than the installation of solar panels. Achieving the right balance between biodiversity actions and climate adaptation is important and it is essential to find holistic and sustainable solutions.

Work is currently underway to develop a method for establishing green areas on existing properties.

Norwegian food and drink

The Thon Group is focusing on more sustainable options for the hotels' and restaurants' food and drink selection. Thon Hotels has a vision to 'lead the way towards the hotel and dining experience of the future'. This has made food and drink material for the group.

In 2024, 50% of food and drink purchased was produced in Norway. The data may vary slightly from supplier to supplier, but so far promises good results in terms of target achievement.

Circular buildings and behaviours

E5 Resource use and circular economy

This chapter combines the material topics of circular construction and circular behaviours from the Thon Group's sustainability strategy, so that the contents of this chapter align with the ESRS standard for resource use and circular economy.

Regulatory requirements for circularity and waste management are becoming increasingly tighter, with expected increases in costs for waste incineration and stricter sorting requirements, among other things. As a real estate company, much of the group's waste is related to hotel guests, tenants and shopping centre customers, packaging from purchased goods and construction projects. This provides opportunities to influence through facilitation, requirements and collaboration in the value chain.

Material reuse reduces the need for raw materials and helps minimise the environmental impact of the construction sector. The construction industry is a major source of waste and resource use, and the group's operations involve both high material consumption and significant waste from construction projects and tenant adaptations. To reduce the impact on the climate and nature, it is therefore crucial to find effective circular solutions.

IDENTIFICATION AND ASSESSMENT PROCESS

ESRS 2 IRO-1

See the 'Process for identifying and assessing material impacts, risks and opportunities' on page 7 for how impacts, risks and opportunities were identified and assessed as part of the double materiality assessment.

In addition, over several years of data collection, waste data reporting and the preparation of the carbon accounting report, we have ascertained and identified where impacts, risks and opportunities are greatest.

GUIDELINES FOR CIRCULAR BUILDINGS AND BEHAVIOURS

E5-1 and MDR-P

The Thon Group's work with circular buildings and behaviours is also integrated in the group's sustainability policy and sustainability strategy, with corresponding roadmaps and targets.

Guidelines have also been prepared for waste sorting and waste management plans prepared for the various units in the business. The waste management plans were developed in close dialogue with our provider

of waste disposal services and contribute to better waste management at our properties.

ACTIONS RELATED TO CIRCULAR SOLUTIONS

E5-2 and MDR-A

Actions and activities related to circular solutions are set out in the Thon Group's annual sustainability action plan. The actions cover all of the group's majority-owned properties. Table 11 shows an overview of actions from 2024.

TARGETS RELATED TO CIRCULAR SOLUTIONS

E5-3 and MDR-T

Targets related to circular solutions are established in the Thon Group's sustainability strategy. Table 6 on page 11 provides an overview of targets related to circular solutions. The group's targets focus on material reuse and waste management, with absolute targets measured as a percentage. These targets express the company's increased level of ambition in terms of sustainability.

Reuse rate

When the targets were set in 2022, the use of reused materials in construction projects was a relatively new focus area, so the targets were aligned with upcoming regulatory requirements, especially the EU Taxonomy. So far, the work has focused on data collection on the use of materials in construction projects and mapping opportunities for reused materials.

Sorting rate

Waste treatment has an impact on the group's greenhouse gas emissions and contribution to the circular economy. The opportunity for further treatment of waste depends on sorting the waste into pure fractions. The sorting rate of our waste has therefore become an important metric for the group's sustainability efforts. Waste sorting has been part of the group's efforts for several years and the target figures are set based on experience and level of ambition. The initiative for expanding waste management at the group's shopping centres is expected to contribute significantly to achieving these targets.

Waste data is received regularly from the group's two main waste disposal suppliers in the group's data warehouse. Progress towards the targets can therefore

TABLE 11: ACTIONS RELATED TO CIRCULAR SOLUTIONS

Activity in the action plan	Status
<ul style="list-style-type: none"> Establish a working group to map upcoming requirements for circular solutions in construction 	Completed.
<ul style="list-style-type: none"> Establish procedures for opportunities for reuse in construction projects 	Ongoing: A method is being developed to systematise this.
<ul style="list-style-type: none"> Map the current potential for use of recycled materials in construction projects 	Completed.
<ul style="list-style-type: none"> Establish collection of data on waste sorting at construction sites 	Completed: Addressed in accordance with TEK 17 and construction planning.
<ul style="list-style-type: none"> Set targets and expand the area of use for Thon Gjenbruk 	Ongoing: Work is being done to systematise this and gain a better overview before setting targets.
<ul style="list-style-type: none"> Continue expansion of waste management project 	Completed.

be monitored regularly during operations. The group's properties depend on good planning for waste management and sorting, as well as the tenants' and hotel guests' commitment and procedures for good waste management. The shopping centres in the portfolio are best equipped for such facilitation and this is also where the largest amount of waste originates (approx. 90%). Commercial properties in the centre of Oslo are less adaptable for optimum waste management due to physical restrictions in the buildings and are therefore expected to have a somewhat lower sorting rate.

The goal to expand the waste management project is therefore expected to contribute to the goal to increase the sorting rate. The project involves testing new solutions for registering and tracking waste at shopping centres, the main goal of which is to reduce the percentage of residual waste. It also provides an overview of which fractions exist in a shopping centre and experiment with which downstream solutions can be found and/or developed for these fractions. The solution has made it easier to engage tenants in sorting and handling the waste better. The group's managers have faster and easier access to waste data through a factual status report, which makes it possible to immediately address deviations. This creates closer collaboration with tenants, which in turn contributes to higher sorting and cleaner fractions.

Food waste

Since 2017, Thon Hotels has focused on reducing food waste through such measures as using smaller plates at the buffet, so that guests do not help themselves to more food than they actually eat.

The hotels have started to register how much food is thrown away. Food waste is the part of food waste that consists of the edible food. Shells and bone residues are not considered food waste, as these are waste that would not have been eaten anyway. The amount of resulting

data that can be used depends on the individual hotel and quality of the data. Continuous efforts are made to improve the use of the system to ensure better data quality.

Based on the data reported from 2024, the active hotels had food waste of 152,947 kg. This corresponds to 50 g per guest. Compared to 2019 (116 g), this is a decrease of 43%. But the data for 2019 is still incomplete, so we plan to establish a reference year.

REUSE OF MATERIALS

E5-4

In 2024, a working group for circular solutions was established, tasked with identifying requirements for circularity in buildings, developing procedures for reuse in construction projects and assessing the potential for recycled materials. In 2025, the Thon Group's input factors in construction projects will be mapped in line with the sustainability strategy, greenhouse gas accounting and work related to the Transparency Act. This will provide better insight into data and the ability to measure progress against set targets.

Thon Gjenbruk

Thon Gjenbruk AS collects surplus goods and equipment from our projects and attempts to reuse them in our own projects. The concept also allows for the possibility to sell the goods externally if appropriate. The initiative is established in Norway, where the majority of operations are also located.

The main purpose of Thon Gjenbruk is to minimise the amount of waste in real estate projects in the group. The group is present in much of Norway. Efforts are therefore made to transport the goods as little as possible. Collection for intermediate storage for use at one of our own projects or sale to external parties therefore takes place at the construction site.

Thon Gjenbruk has had limited activity to date. Targets have been set to expand the company's scope of use. The target has been carried forward to 2025.

WASTE AND SORTING RATE

E5-5

Table 12 provides an overview of the Thon Group's amount of waste for 2024. The total waste volume was 1% lower than the previous year, which represents a marginal reduction. At the same time, the percentage of waste

sent to material recycling has increased, while waste for incineration and landfill has been reduced. This development is positive, as material recycling helps reduce environmental impact, particularly through lower consumption of virgin resources.

The sorting rate in 2024 was 60.4%, a reduction of 0.1 percentage points compared to the previous year. This means that, despite an increase in waste sent to material recycling, the amount of residual waste has remained virtually unchanged.

TABLE 12: WASTE SORTING (E5-5)

Waste	Previous year 2023	Status 2024	Change (kg)	Change (%)
Derived from final treatment	15,059,771	16,233,528	1,196,929	8%
Hazardous waste	40,190	48,876	8,686	22%
Preparation for reuse	-	-	-	-
Material recycling	40,190	48,876	8,686	22%
Other recovery	-	-	-	-
Non-hazardous waste	14,996,409	16,184,652	1,188,243	8%
Preparation for reuse	-	-	-	-
Material recycling	14,996,409	16,184,652	1,188,243	8%
Other recovery	-	-	-	-
Directed to final treatment	10,722,423	9,382,893	-1,339,530	-12%
Hazardous waste	412,720	360,008	-52,712	-13%
Incineration	410,676	346,306	-64,370	-16%
Landfill	2,044	13,702	11,658	-570%
Other final treatment	-	-	-	-
Non-hazardous waste	10,309,703	9,022,885	-1,286,818	-12%
Incineration	6,436,835	8,720,080	2,283,246	35%
Landfill	3,787,270	178,177	-3,609,094	-95%
Other final treatment	85,598	124,628	39,030	46%
Total amount of waste	25,759,022	25,616,421	-142,601	-1%
Total amount of non-recovered waste	10,722,423	9,382,893	-1,339,530	-12%
Percentage of non-recovered waste	41.6%	36.6%	-5%	
Total hazardous waste	452,910	408,884	-44,025	-10%
Sorting rate	60.4%	60.5%	-0.1	



Social matters

This chapter deals with the pillar of social justice from the group's sustainability strategy. The Thon Group's material topics within these pillars are mapped against, and structured according to, the social topics in the ESRS framework.

TABLE 13: SOCIAL JUSTICE				5 GENDER EQUALITY	10 HUMAN RESOURCES
2023	2025	2027	2030		
Inclusive workplace (S1 – Own workforce)					
Create a working group for equality, inclusion and diversity	✓	Hire a manager for equality, inclusion and diversity	✓	Representative management	
Equality, inclusion and diversity strategy	✓	Report on transparency, diversity and equality			
			40% of each gender overall and on management levels 1-4		
Human rights, transparency and responsible business practices (S2 – Value chain workers)					
Human rights policy, code of conduct, ethical procurement requirements in line with the Transparency Act	✓	Ethical procurement strategy and procedures implemented		Full insight into value chain	
Human rights landing page and public request management system	✓				
		Report on transparency, diversity and equality			
Supply chain mapping for 1-3 product categories	✓	Supply chain mapping for 50% of product categories	Supply chain mapping for 100% of product categories		
Conduct an overall risk assessment	✓	Separate guidelines for high-risk human rights violations			

Inclusive workplace

S1 Own workforce

INTERESTS AND VIEWS OF STAKEHOLDERS

ESRS 2 SBM-2

See the stakeholder assessment on pages 9 and 10 for how employees and their interests and views were taken into account in the double materiality assessment. Representatives from both HR and HSE were also included in the project as experts. The company's HSE manager was the representative from the HSE department. The company's HSE manager also attends regular meetings of the working environment committee, where employees and their representatives can express their needs and opinions.

IMPACTS, RISKS AND OPPORTUNITIES

ESRS 2 SBM-3

The Thon Group has an impact on the working environment the group creates through its efforts related to equality, inclusion and diversity internally. With its own HR and HSE departments, the group focuses on how to best look after its employees by focusing on equality, inclusion, diversity, health, attendance and safety.

There are growing requirements for transparency in terms of equality and diversity in working life, both for employees and management. At the same time, there is increased focus on anti-discrimination and inclusion. A lack of an inclusive culture can affect the company's attractiveness as an employer, reduce employees' sense of belonging and increase reputational risk in the event of perceived discrimination or inequality in opportunities and pay.

Studies show that diverse companies perform better than less diverse, and that employees who undergo personal development thrive better and remain longer at a job. In addition, young employees are largely attracted to employers with a sense of responsibility.

In order to create a good working environment and ensure equal opportunities, the Thon Group aims to work actively, purposefully and systematically to promote equality, diversity and inclusion, as well as prevent discrimination.

GUIDELINES RELATED TO OWN WORKFORCE

S1-1

The work with equality, diversity and inclusion (EDI) is integrated in the group's HR and HSE activities and continuously safeguarded throughout the term of employment for all employees across the organisation. This work is rooted in several general documents, including:

- Ethical guidelines in the Thon Group
- Strategy for equality, diversity and inclusion
- Sustainability policy

- Company instructions for personnel policy
- Company management instructions for personnel management
- Diversity and equality efforts in the Thon Group
- Whistleblowing poster

Consideration of equality and non-discrimination is further incorporated in the group's personnel policy, as well as relevant policies and manuals.

The HR department prepares an annual equality report in accordance with the activity and reporting obligation. For more information, see thon.no.

In order to systematise equality, diversity and inclusion efforts, a designated working group was established in 2023, which developed a strategy for the group's efforts through to 2030. The strategy aims to ensure that the group remains an inclusive workplace and supports the target of representative management. A manager has also been appointed for these efforts and equality, diversity and inclusion have now been jointly established as a separate specialist area under the company's HSE manager.

PROCESSES FOR ENGAGING WITH WORKERS AND WHISTLEBLOWING

S1-2 and S1-3

The Thon Group has several arenas in which employees and their representatives are involved for both information sharing and participation in matters that may affect them. These include:

- Quarterly management team meetings
- Department meetings (at least quarterly)
- Working Environment Committee (AMU)
- Safety officers
- Safety inspections
- Performance appraisals
- Employee surveys
- HSE email

Working Environment Committee

The Working Environment Committee (AMU) acts as an advisory and decision-making body to ensure compliance with working environment legislation. The committee participates in the planning of health, environment and safety activities and monitors the development of the working environment.

The Thon Group has a total of 13 working environment committees, including a central AMU for the hotel and restaurant business and 12 local AMUs, nine of which

TABLE 14: ACTIONS RELATED TO AN INCLUSIVE WORKPLACE

Activities in the action plan	Status
<ul style="list-style-type: none"> Project for equality, diversity and inclusion established as a specialist field 	Completed: Separate specialist field under HSE.

are linked to Thon Hotels. Over 90% of employees are represented through a formal AMU.

Reporting suspected wrongdoings

The Thon Group encourages the reporting of suspected wrongdoings, as this may help to ensure that the situation can be resolved. Internal reports can be made to the line manager, a manager higher up in the line, a safety representative or employee representative. Our whistleblowing channel is available to parties wishing to remain anonymous or who are not an employee of the company. The group has engaged an external party to receive reports through the whistleblowing channel in order to safeguard any desired anonymity. The company CHRO and company HSE manager receive the reports and assess who is responsible for following up on each whistleblowing case.

The group has produced a whistleblowing poster, describing what whistleblowing is, the options and rights of a whistleblower, and what happens when a report is made. A procedure has also been drawn up describing what someone wishing to make a report needs to do. The whistleblowing poster describes the group's procedures for reporting suspected wrongdoings, such as discrimination, harassment or bullying. The document is based on the fact that everyone in the group has equal worth, so such incidents should not occur. The threshold for reporting should be low so that anyone experiencing undesirable behaviour is taken seriously.

The group also has various systems in place for reporting and handling non-conformities. Non-conformities within safety, fire, privacy and HSE are reported here. Non-conformities can take different forms and do not have to concern suspected wrongdoings.

ACTIONS RELATED TO OWN WORKFORCE

S1-4

Actions and activities related to an inclusive workplace are set out in the group's annual sustainability action plan. Responsibilities are assigned to different disciplines and business areas. Table 14 shows an overview of actions completed in 2024.

TARGETS RELATED TO OWN WORKFORCE

S1-5

Targets related to an inclusive workplace are established in the group's sustainability strategy. See Table 13 on page 22 for a complete overview.

These targets are established in line with the group's ambition to promote equality, diversity and inclusion. Monitoring takes place quarterly through status updates to executive management, facilitated through the sustainability department together with other targets in the sustainability strategy.

OUR EMPLOYEES

S1-6

Employee statistics are collected from the group's HR system and from externally managed companies. The data is based on each individual who worked at one or more of the majority-owned Thon Group companies full-time or part-time in 2024. Unlike in previous years, this includes on-call and extra workers, but not hired

TABLE 15: EMPLOYEES (S1-6)

Category	Number	Percentage
Number of employees by gender		
Women	3450	52%
Men	3125	47%
Not reported	24	0%
Number of employees by country		
Norway	6097	92%
Sweden	105	2%
Belgium	352	5%
Netherlands	45	1%
Number of permanent employees	3469	53%
Women	1714	
Men	1747	
Not reported	8	
Number of temporary employees	345	5%
Women	187	
Men	156	
Not reported	2	
Number of employees without guaranteed working hours	2785	42%
Women	1549	
Men	1222	
Not reported	14	
Staff turnover⁷	45%	
Number of employees who have left the company ⁷	1725	
Total number of employees	6599	100%

⁷ Only includes data from our Norwegian companies managed through our central HR system.

temporary workers. This is to ensure that the statistics comply with ESRS disclosure requirements. Gender is according to national gender recognition regulations, so the ‘other’ category is not relevant.

The majority of our employees work in Norway and 48% are permanent employees. A total of 47% of the group’s employees do not have guaranteed working hours. This is because we have many hotel and restaurant employees who are on-call or extra workers.

DIVERSITY METRICS

S1-9

Table 16 provides an overview of the group’s age distribution. The statistics show that the majority of employees are 50 years of age or younger. This is probably because many of our team members are hotel or restaurant employees without guaranteed working hours. This is a group of employees that often consists of younger employees in part-time positions, such as students.

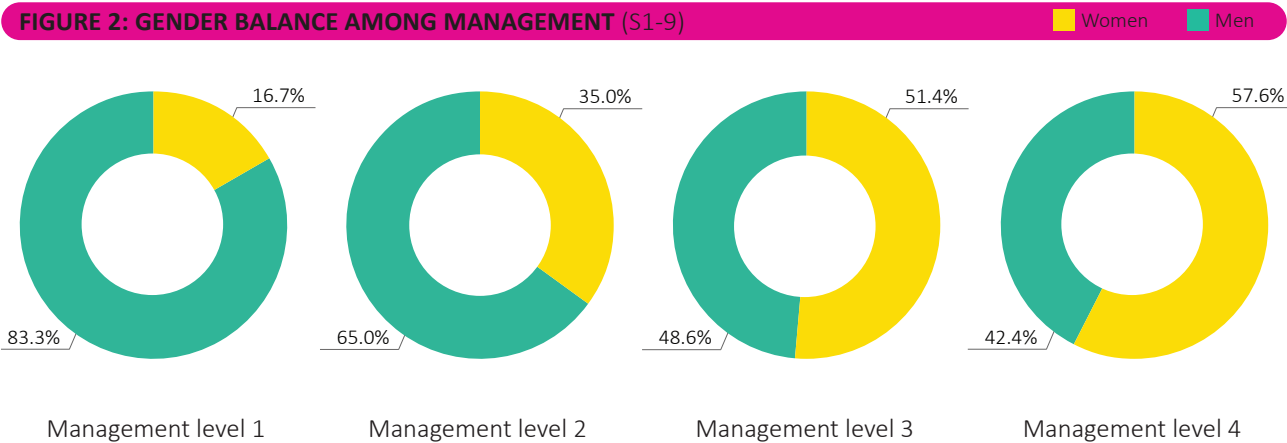
The group aims to achieve a representative management group. In 2024, 62% of all managers in the company were women, while 38% were men.

ADEQUATE WAGES

S1-10

The Thon Group ensures competitive and fair wage conditions for all employees in line with applicable laws, collective agreements and industry standards.

TABLE 16: AGE DISTRIBUTION (S1-9)		
Category	Number	Percentage
Number of employees under 30	2698	41%
Women	1614	
Men	1082	
Gender not reported	2	
Number of employees aged 30-50	2730	42%
Women	1334	
Men	1395	
Gender not reported	1	
Number of employees over 50	1063	
Women	459	16%
Men	604	
Gender not reported	0	
Total number of employees	6491	98%
<i>(Remaining 2% of employees have not reported their age)</i>		



Human rights, transparency and responsible business practices

S2 Workers in the value chain

Respect within the company for working conditions and human rights in the value chain is the subject of increasing focus. The Thon Group purchases goods and services for several billion NOK per year. This entails a significant responsibility as a purchaser.

STAKEHOLDER INTERESTS AND VIEWS

ESRS 2 SBM-2

See the stakeholder assessment on pages 9 and 10 for how stakeholders and their interests and viewpoints were taken into account in connection with the double materiality assessment.

The group's purchasing department has overall responsibility for responsible procurement practices and following up on contract suppliers through regular dialogue. Human rights due diligence assessments are now an integral part of the agenda during these meetings to gain better insight into suppliers' value chain activities.

In the past, the group used annual supplier surveys to this end. In 2024, the focus was shifted to relationship building and skills development in prioritised risk areas. This takes place through a review of supplier policies and procedures, as well as supplier meetings. The aim is to understand their work, assess industry maturity and establish relationships that promote collaboration in due diligence assessments. This also provides valuable insight into supplier sustainability perspectives.

IMPACTS, RISKS AND OPPORTUNITIES

ESRS 2 SBM-3

As a property owner and large-scale purchaser, the Thon Group has the opportunity to influence human rights and workers' rights in the value chain. The choice of suppliers and products has direct consequences in these matters. The group purchases a wide range of goods and services from different suppliers, which entails complex supply chains and challenges in ensuring transparency at all stages.

A strategic approach to increasing insight in the value chain enables both the potential and actual risk of irresponsible behaviours to be identified and reduced. Better transparency can contribute to positive changes in the supply chain and provide valuable knowledge that strengthens transparency for customers and tenants. This facilitates more informed and ethical choices for end users.

In 2024, the group continued its work based on the results of the group's previous overall risk assessment. The risk assessment resulted in the following prioritised risk areas:

- Labour rights in construction projects and associated supply chains
- Working conditions at IT hardware production sites
- Working conditions in agriculture linked to the supply chain for dry goods

Labour rights in construction projects and associated supply chains

The construction industry, in which the group has a significant presence, is particularly vulnerable to occupational crime, high accident rates, a lack of trade union organisation and low wages, which increases the risk of violations of health, safety and labour rights. This is an area in which we invest heavily, have a high potential impact on and a central business relationship with.

In several construction and expansion projects, we use turnkey contractors, who both carry out the construction work and are responsible for the procurement of goods and services. This means that many input factors are provided by subcontractors, which makes it more difficult to maintain a full overview of origin.

Nevertheless, we have established guidelines for what is included in the project and how it is carried out, giving us an opportunity to influence the choice of materials and supply chains.

Working conditions at IT hardware production sites

The group's dependence on IT hardware entails material impacts, particularly related to resource extraction, production and disposal. Risks include human rights violations in the supply chain. The extraction of raw materials in particular involves an increased risk of violations of labour rights.

IT hardware consists of numerous components produced in countries with varying working conditions and complex supply chains that can make traceability challenging.

This underscores the need for increased insight and due diligence, as the greatest human rights risks are identified at the early stages of the value chain, in raw material extraction and production processes.

Working conditions in agriculture linked to the supply chain for dry goods

Potential risks associated with dry goods are often related to labour rights among agricultural workers, particularly in the production and harvesting of raw materials in countries with a high risk of human rights violations.

In 2024, we chose to focus on coffee, cocoa, tea and sugar, as these are all high-risk products from the Norwegian Agency for Public and Financial Management (DFØ)'s list, as well as the fact that we buy a relatively large quantity of these products.

GUIDELINES RELATED TO VALUE CHAIN WORKERS

S2-1

To ensure that human and workers' rights are respected throughout the Thon Group's value chain, policies and procedures, as well as ethical guidelines, have been prepared for suppliers.

Responsible business practices policy

The group's policy for responsible business practices commits the company to respect people, society and the environment. The policy covers requirements for own operations with regard to due diligence assessments, countries under trade boycott and requirements for conditions in the supply chain. It also describes the principles of responsible business practices to which we are committed through our membership in Ethical Trade Norway.

Company procurement policy and responsible procurement practices policy

A company procurement policy has been prepared, as well as detailed procedures for supplier selection. This includes mapping several aspects of social responsibility relevant to the individual categories in which these considerations are integrated. In 2024, we revised our company procurement policy to include a commitment to work towards ensuring that all procurement takes place in accordance with the OECD guidelines for responsible business conduct.

During the autumn of 2024, a procedure for responsible procurement practices was drawn up. The goal was to obtain an overview how the work with responsible procurement practices is performed and will be performed in practice, as well as to specify the distribution of roles and therefore create internal anchoring within the company. The policy provides the basis for implementing our public commitments to responsible procurement in practice, as expressed in the company procurement policy and in the responsible business practices policy.

Ethical guidelines for suppliers

The group has prepared a set of ethical guidelines with clear requirements for suppliers and subcontractors. To clarify our expectations, the Thon Group has developed requirements based on the UN conventions and ILO's core conventions. These cover topics such as human rights, forced labour, child labour, freedom of association, wages, discrimination, HSE, the environment, corruption and animal welfare, as well as improvement work related to these topics.

The ethical guidelines are attached as an appendix to all supplier agreements. When calling for tenders and concluding agreements, they are reviewed prior to any signing. Suppliers undertake to comply with these requirements and pass them on to their subcontractors. We also expect them to actively contribute to the compliance of subcontractors, while ensuring compliance in their own operations.

PROCESS FOR ENGAGING WITH VALUE CHAIN WORKERS

S2-2

The group's due diligence assessment activities are currently at a level in which dialogue primarily takes place with our suppliers (see 'Interests and views of stakeholders' on page 27). This work will help to uncover possible risks of human rights and labour rights violations. But we are also fully aware that this means that we are currently not in direct contact with workers or their representatives in the value chain. This process is expected to develop over time as risks are identified and a need for more direct contact and procedures for this may arise.

MANAGEMENT OF NEGATIVE IMPACTS

S2-3

Through the group's responsible business practices policy and efforts related to due diligence assessments in accordance with the OECD's guidelines to responsible business conduct, the group is committed to and works strategically to ensure or contribute to remediation if we have caused or contributed to a material negative impact on value chain workers.

Identifying and dealing with any violations of labour rights in our construction projects and associated supply chains requires collaboration with key suppliers. Supplier dialogue has played a key role in our risk mapping in 2024, especially in attempts to understand the structure of our supply chains and our connection to any challenges. A concrete procedure for remediation of negative impacts has not yet been developed. This is being developed as needs are identified.

The group has a whistleblowing channel available at thon.no, open to anyone wishing to report suspected

wrongdoings related to the business, including matters affecting workers in the value chain. All reported cases are investigated and the response is adapted to the nature and severity of the case. As we have not yet received any reports related to workers in the value chain, no specific procedure has been established for handling such cases. For further information on the whistleblowing channel, see the ‘Reporting suspected wrongdoings’ section on page 23.

Our ethical guidelines for suppliers also require that they “*have a well-functioning system for handling complaints related to human rights, labour rights, the environment and corruption*” and “*ensure that such complaints can be made by workers and external parties, including local communities and civil society organisations*”.

ACTIONS

S2-4

A number of overall processes are set out in the group’s sustainability action plan. More concrete actions are defined in a separate due diligence action plan. This contains more concrete targets in relation to human rights due diligence assessments in accordance with the Transparency Act. Table 17 provides an overview of the actions in the action plan for due diligence assessments in 2024. Future actions for 2025 are also shown in Table 17.

In 2014, the focus was on further mapping and identifying risks within the prioritised risk areas in order to identify and if relevant, deal with actual and potential human rights violations.

Labour rights in construction projects and associated supply chains

In 2024, the group prioritised internal skills development related to due diligence assessments in construction projects and supply chains. This has strengthened the understanding of the group’s connection to potential violations of workers’ rights and laid the foundation for effective actions.

Desktop assessments of guidelines and procedures were carried out at six suppliers, followed by dialogue meetings to clarify approaches, expectations and opportunities for collaboration. Building relationships with suppliers is key to increasing transparency and accountability in the value chain.

Based on this work, we have identified two prioritised risk areas:

- Worker rights and risk of wage theft in Norwegian construction projects.
- Working conditions in the supply chain for building materials.

TABLE 17: ACTIONS RELATED TO HUMAN RIGHTS, TRANSPARENCY AND RESPONSIBLE BUSINESS PRACTICES

Activities in the 2024 action plan	Status
<ul style="list-style-type: none"> • Hire a person responsible for the work with the Transparency Act and due diligence assessments. 	Completed.
<ul style="list-style-type: none"> • Develop new and revise existing policies, procedures and guidelines for responsible procurement practices. 	Completed.
<ul style="list-style-type: none"> • Map where in the company the majority of procurement and other activities that impact the work on due diligence assessments take place. 	Completed.
<ul style="list-style-type: none"> • Build relationships with suppliers of IT hardware and improve competence in their due diligence assessments. 	Completed: Ongoing work, but was completed in 2024.
<ul style="list-style-type: none"> • Build relationships with dry goods suppliers and improve competence in their due diligence assessments. 	Completed: Ongoing work, but was completed in 2024.
<ul style="list-style-type: none"> • Improve competence in the work with due diligence assessments in the Norwegian construction industry, including the due diligence assessments of our largest suppliers in construction and civil engineering. 	Completed.
Upcoming actions in the 2025 action plan	
<ul style="list-style-type: none"> • Map input factors within the category of construction companies and small contractors, as well as geographical travel. • Map stakeholders in relation to labour rights at Norwegian (our) construction sites. • Initiate cooperation project on due diligence assessments with supplier(s) within the Major contractors category. • Further risk mapping related to IT hardware procurement. • Map the supply chain for prioritised risk products (coffee, tea, cocoa and sugar) within dry goods and work with the supplier to implement actions to reduce the risk of violations in cooperation with the main supplier. 	

Working conditions at IT hardware production sites

Internal skills development and relationship building have also been central to the risk assessment of the IT hardware industry. We held a meeting with our IT hardware supplier to discuss their due diligence assessments and implementation of the Transparency Act. This laid the foundation for further cooperation on responsible business practices.

Close cooperation with the supplier is particularly important, as they are more closely connected to the links in the value chain with the highest risk of human rights and labour rights violations. Increased internal competence makes us better equipped to identify risks and cooperate on actions where necessary.

Working conditions in agriculture linked to the supply chain for dry goods

To strengthen insight into our dry goods supplier's activities in relation to due diligence and responsible sourcing practices, we conducted an analysis of their available policies and procedures. In autumn 2024, we established a sustainability committee in collaboration with the supplier to promote joint sustainability targets, clarify our expectations and lay the foundation for further cooperation on due diligence assessments. Among other things, we emphasised the need for increased traceability in the supply chain for better mapping of raw material origin.

To gain more insight into risk products, we have engaged in dialogue with relevant organisations about certification as a possible action. Participation in professional networks

has also enhanced the group's understanding of industry risks in the agricultural value chain and international guidelines for responsible business practices.

TARGETS

S2-5

Targets related to human rights, transparency and responsible business practices are set out in the group's sustainability strategy. See Table 13 on page 21 for a complete overview.

These targets are set in line with the group's ambition to achieve full insight in the value chain. Since the previous knowledge base was limited, the first step has been to collect the necessary information. Through dialogue and collaboration with our closest suppliers, we expect to strengthen our understanding of the value chain, which will facilitate the identification and uncovering of actual and potential violations of human rights and labour rights.

Monitoring takes place quarterly through status updates to executive management, facilitated by the sustainability department, together with other targets from the sustainability strategy.

The sustainability department continuously monitors progress through defined actions and sub-goals in the action plan for human rights due diligence assessments. The action plan, which applies to the period 2024-2027, sets out concrete sub-targets, actions and further steps to ensure targets are achieved in line with the group's strategic priorities.

UN Global Compact

The Global Compact is the UN initiative for cooperation with the business community to promote sustainable development. The letter below was sent to then UN Secretary-General H.E. Ban Ki-moon and confirms that the Thon Group is a participant in the Global Compact initiative and that the group promises to integrate the ten basic principles into its strategy and daily operations. The next letter is a confirmation that the Thon Group is still a signatory in the UN Global Compact initiative and that the group's work will be presented in an annual report (Communication on Progress).



02.05.2013

H.E. Ban Ki-Moon
Secretary-General
United Nations
New York, NY 10017
USA

Dear Mr. Secretary-General,

I am pleased to confirm that *Olav Thon Gruppen* supports the ten principles of the Global Compact with respect to human rights, labour, environment and anti-corruption.

We are committed to making the Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Millennium Development Goals. Olav Thon Gruppen will make a clear statement of this commitment to our stakeholders and the general public.

We recognize that a key requirement for participation in the Global Compact is the annual submission of a Communication on Progress (COP) that describes our company's efforts to implement the ten principles. We support public accountability and transparency, and therefore commit to report on progress within one year of joining the Global Compact, and annually thereafter according to the Global Compact COP policy.

Sincerely yours,

Mr. Dag Tangevald-Jensen
CEO, Olav Thon Gruppen



OLAV THON GRUPPEN

06.03.2025

To our stakeholders;

I am pleased to confirm that Olav Thon Gruppen reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In the annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our primary channels of communication.

Sincerely yours,

Mr. Kjetil Nilsen
CEO, Olav Thon Gruppen

ESRS Index

The Thon Group's sustainability report for 2024 is based on the ESRS framework for sustainability reporting. This index meets ESRS 2 IRO-2 disclosure requirements.

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E1-5	Energy consumption and mix	Pages 13 and 14
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E1-7	GHG removals and GHG mitigation projects financed through carbon credits	Not relevant
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E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Uses phase-in option

E4 BIODIVERSITY AND ECOSYSTEMS

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E4-6	Potential financial effects from biodiversity and ecosystem-related risks and opportunities	Uses phase-in option

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S – Social matters

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S1-16	Remuneration metrics (pay gap and total remuneration)	Uses phase-in option
S1-17	Incidents, complaints and severe human rights impacts	Uses phase-in option

S1 OWN WORKFORCE

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S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	Page 27
S2-5	Targets related to managing material impacts, advancing positive impacts, as well as to risks and opportunities	Page 28

Appendix

The appendix provides supplementary information on the various elements in this year's sustainability report.

Annex A

LIST OF TOPICS SUBMITTED TO AND ASSESSED BY THE THON GROUP'S EXECUTIVE MANAGEMENT

- Status of the sustainability department's work in 2024, including SBTi and CSRD.
- Introduction to CSRD, ESRS and what this will mean for the Thon Group.
- Laws and international agreements, including gender balance on the boards and COP28.
- Quarterly status action plan, including EV chargers, BREEAM certification and gender balance among management.
- Nature impact assessment.
- Transparency Act and human rights due diligence assessments.
- The EU Taxonomy, including minimum social safeguards.
- Project plan, procedures and principles for double materiality project 2025.

Annex B

DATA, ENERGY

The Thon Group has implemented an energy monitoring system (EOS) called Energinet. This is a tool for monitoring energy consumption to ensure effective development and optimisation of the property. Reported energy consumption is consumption that does not include the tenant's own consumption.

There is a difference between electricity in our Thon Innsikt database and the Energinet portal. For 2024, this difference was 0.02%. The reason for this lies in how the Thon Group's hierarchy is structured in the portal and how extraction is done through an API. For example, a meter may be located under several buildings with a percentage distribution that cannot be retrieved. The meter will then be registered as if there were two meters in our database. Another important factor is that Energinet is a tool used daily by the company's operations department, which means that there are continuous changes in meter value, area divisions, new/deleted buildings, etc.

Conversions from the actual consumption of petrol, diesel, gas and heating oil to energy consumption (MWh) are collected from our carbon accounting report.

DATA, GREENHOUSE GAS ACCOUNTING

The carbon accounting report was prepared in collaboration with CEMAsys, who provide advice, as well as a solution for calculating the carbon footprint of the Thon Group. Our carbon accounting report complies with the GHG protocol and uses emission factors from the IPCC (AR4). An account of the data in general is described for the individual data in the various parts of the report, and in the appendix. The complete carbon accounting report, with the associated report on methodology from CEMAsys, is available on the Thon Group's website.

DATA, FUEL

The fuel data is an extract from our fuel supplier. It was collected as a single extract for 2024 and grouped by company. We only have data available from when the company card was used at the supplier's stations. We do not have data available for any other fuel consumption and consumption is not included in the report in this case.

DATA, NATURAL GAS

Natural gas is collected from Energinet and reported as actual consumption.

DATA, AIR TRAVEL

A single extract is collected from the travel agency who is the main supplier for air travel in the Thon Group, with information about passenger kilometres per company. If business trips have been booked outside of the travel agency, we do not have data available and this is not included in this report.

DATA, EMPLOYEE COMMUTING

Calculations have been made based on the number of employees in the company, the average distance between home and workplace and a national distribution of modes of transport used to commute to the workplace. The number of employees per mode of transport multiplied by the average distance provides the number of passenger kilometres per mode of transport, which is then multiplied by emission factors for the different modes of transport. Emission factors from Statistics Norway were used here.

DATA, LEASED ASSETS

An assessment has been made of the level of energy intensity (kWh per square metre) of the different shopping centre and commercial property building categories. It is used to calculate an estimate of the buildings' total energy consumption. By then subtracting the group's total consumption, we can calculate each tenant's estimated consumption. The same energy intensity is used regardless of the year.

FRANCHISES

The data is obtained directly from the group's partner hotels through an annual survey. The consumption data entered into the carbon accounting report therefore depends on which hotels respond to the survey. Every attempt is made to receive responses from everyone, but there is no guarantee at this point.

DATA, WASTE

The data for waste is collected from our waste disposal suppliers. All waste figures were collected for the entire calendar year of 2024. Data from our largest supplier is collected regularly from automated data. The sorting rate is calculated on the basis of waste volume and represents the group's sorting rate in its entirety.

The Thon Group has an overview of which waste fractions are used in sorting at source. Different codes for waste and emissions are used in the mapping of fractions, depending on the country. In Norway, NS codes are used, while EAL codes are used in Sweden and the EU. The supplier for carbon accounting uses EF codes for emissions per waste fraction. There is currently no key

to the relationship between the different codes. As a result, the Thon Group team and consultants from our supplier have together attempted to establish a relationship between these categories. This was initially necessary to identify the relationship between the NS codes and EAL codes. It was also important to link these to the EF codes because the EF codes determine the calculation variable for the conversion of waste volume to CO₂ equivalents.

Food and residual waste from Sweden is managed by Swedish municipalities and these figures were excluded due to limited data access. We only have access to the number of waste collections, but not the actual volume of waste. Nor was an estimation made of what these figures could be. For future reporting, we will strive for find ways to access this data on a monthly basis.

DATA, OWN EMPLOYEES

Gender statistics are collected from the Thon Group's HR system and manually from externally managed companies. The data is based on each individual who worked at least one of the Thon Gruppen AS companies full-time or part-time in 2024. This includes on-call and extra workers, but not hired temporary workers.

The age distribution is calculated based on the year each employee was born and categorised into the three categories under 30 years, 30-50 years and over 50 years.

Employee turnover is calculated based on the number of employees who have left the company during the reporting year divided by the average number of employees.

In connection with the Thon Group's sustainability strategy and targets of 40% of each gender at management levels 1-3, a mapping process was carried out of everyone in a managerial role (personnel responsibility) in order to ensure the correct division of levels. The starting point is that executive management is the highest management level (level 1) and the other levels are defined accordingly. The definition is based on position rather than person. In other words, where one person has two positions, the top management position was decisive. This is also reflected further down. For example, persons at management level 4 can have a manager who is at management level 3, but also level 2. In this case, management level 2 applies. The person at management level 4 will remain at level 4 despite the fact that the person concerned reports directly to someone at management level 2. The data for gender distribution among managers originates from the Thon Group's HR system in Norway. This system includes the management levels for all managers. The number of managers is grouped by gender, followed by a simple percentage calculation of gender distribution for management levels 1-4 and an overall summary.

THE THON GROUP

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