### Platzer Fastigheter AB Shades of Green Assessment Update 2023

20 June, 2023

#### **EXECUTIVE SUMMARY**

**Platzer Fastigheter AB (hereafter Platzer) was founded in 1969. In 2008 Platzer was established in its current form, with a strong focus on commercial properties in the Gothenburg area.** End of 2022, the company owned 72 properties with a total lettable area of approximately 845,000 m<sup>2</sup>, worth SEK 27bn and with total rental revenue of SEK 1,229m. Of the total area, offices and shops account for 70%, while industry/warehouses accounted for 30%.

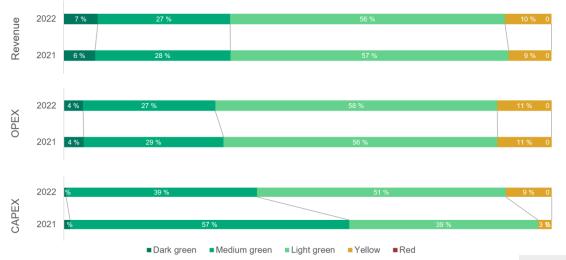


Figure 1: Shading of revenue and investments for Platzer from 2021 to 2022

We note that Platzer's portfolio stayed largely the same in 2022. One property was acquired, and six new construction projects were ongoing (three fully owned, three parts of a joint venture with Bockasjö<sup>3</sup>.) In 2022, 90% of the rental revenue, 89% of OPEX and 91% of CAPEX came from buildings with a Shade of Green. While the share of green stayed largely the same for revenue and OPEX, the share of green-shaded investments has decreased 6% year-on-year and has shifted to lighter shades. This is primarily due to significant investments in a few Light Green properties. The Shade of Green assigned to a property reflects its overall climate risk and environmental impact and is based on the same methodology CICERO Shades of Green used in 2021 to enable comparison of Platzer's portfolio performance over time.

The Shade of Green assigned to Platzer's properties reflects the energy use of the building, the level of environmental certification, and the management of physical climate risks. Platzer is well aware of the physical risks to its portfolio. Dark Green is assigned to properties with the highest levels of green building certifications and energy performance.

### Nasdaq Green Designation Annual Renewal<sup>1</sup>

Sector: Real Estate

**Region: Sweden** 

Based on this review, CICERO Green assesses that Platzer meets the Nasdaq Green Equity Designation requirements for annual renewal as set out in the Nasdaq Green Equity Principles.



<sup>&</sup>lt;sup>1</sup> CICERO Shades of Green is an approved reviewer to assess alignment with the Nasdaq Green Equity Principles, Nasdaq.com/Solutions/Nasdaq-Nordic-Green-Designations

 $<sup>^{2}</sup>$  For the purpose of this assessment, revenue and turnover are used interchangeably, as are operating costs and OPEX, investments and CAPEX  $^{3}$  The three properties that were under construction in 2022 and owned in a joint venture with Bockasjö will be full owned by Platzer by the  $30^{th}$  of June 2023.

Medium Green is assigned to properties with high levels of certification and strong energy performance. Light Green is assigned to properties with adequate energy performance or certification as well as individual energy efficiency activities. Energy performance for each Shade of Green is based on EPC labels, percentage improvement over regulation, and comparison to Platzer's average energy intensity.

**Platzer has introduced a new energy intensity target.** By 2025, the target is that the property portfolio energy intensity shall be lower than 70 kWh/sqm. It believes having a target based on specific energy use in its property portfolio rather than a general 2% reduction annually helps the organization to work in a more efficient way and to focus on where energy efficiency projects have the largest effects. The energy consumption for the like-for-like portfolio declined by 6.7% in 2022 compared to 2021. According to Platzer, the decrease was the result of investing in new energy monitoring systems, working actively to improve energy management, and energy efficiency measures.

In 2022, Platzer strengthened its scope 3 reporting by introducing a new emissions category: capital goods in tenant adaptations. In 2022, Platzer carried out 50 tenant adaptations (compared to six new construction projects) that were included in emission reporting. Emissions from bigger construction projects and tenant electricity use are currently not covered by scope 3 reporting. The company has still not introduced any scope 3 reduction targets.

While Platzer previously has assessed physical climate risks in the areas where most of its properties are clustered, in 2023 it started to perform such assessment on a property level. It has considered the requirements of Appendix A of the EU Taxonomy DNSH criteria for climate adaptation and, with help from external consultants, has performed the assessments based on standardized processes.

Since our previous assessment update, Platzer has taken steps to improve its environmental governance. In 2022, the recommendations from the Task Force on Climate-Related Financial Disclosures (TCFD) were for the first time addressed in its annual report. Key developments include setting new targets, systemizing its sustainability work and planning to introduce a sustainability framework for new development projects. The overall assessment of Platzer's environmental governance gives it a rating of **Good**.



Figure 2: CICERO Green assesses Platzer's governance structure and practice to be Good.

The relevant EU Taxonomy criteria are Acquisition and ownership of buildings, Construction of new buildings, Renovation of existing buildings, as

well as diverse additional activities related to energy performance, renewable energy, and electric vehicle charging stations. We assess that Platzer had no fully taxonomy-aligned turnover, OPEX nor CAPEX in 2022, as Swedish trade associations are currently seeking clarity on the DNSH as further guidance is needed before concluding on alignment. 23% of revenues, 18% of OPEX, and 47% of CAPEX was aligned with the Substantial Contribution criteria only. The share of alignment has fallen due to an updated report defining the top 15% of Swedish building stock in terms of energy performance. Shades of Green still considers that Platzer appears to partly fulfil the minimum social safeguards of the EU taxonomy.

Table 1:	Table 1: Sector Specific Metrics for Platzer						
	Energy use (kWh/m² Atemp)	Environmentally certified (% of area)	Emission intensity scope 1 + 2 (kg CO2e/m <sup>2</sup> )	Per cent area heated directly by fossil fuels			
2022	78.5	63%	0.67	0%			
2021	80.6	51%	0.77	0%			
2020	82.5	48%	0.65	0%			



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# 1 Platzer key developments 2023

### **Company update**

Platzer Fastigheter AB (Platzer) is a real estate company founded in 1969, but it was not until 2008 that Platzer in its current form was established. Today, Platzer is one of the largest commercial property companies in Gothenburg, primarily in office property. The company's strategy is to participate in the creation, preservation and regeneration of the best locations in Gothenburg and maintaining a people focus while doing this. As of 2022, the company owned 72 properties with a total lettable area of approximately 845,000 m<sup>2</sup>, worth SEK 27bn and with total rental revenue of SEK 1,229m. Of the total area, offices and shops account for 70%, while industry/warehouses accounted for 30%.

### **Governance Update**

The overall assessment of Platzer's environmental governance gives it a rating of **Good**. Since our previous assessment update, Platzer has taken steps to improve its environmental governance. In 2022, the recommendations from the Task Force on Climate-Related Financial Disclosures (TCFD) were for the first time addressed in its annual report. Key developments include setting new targets, scope 3 reporting, systemizing its sustainability work and plans to introduce a sustainability framework for new development projects.



In 2022, Platzer strengthened its scope 3 reporting by introducing a new emissions category: capital goods in tenant adaptations. In 2022, Platzer carried out 50 tenant adaptations (compared to six new construction projects) that were included in emission reporting. Emissions from bigger construction projects and tenant electricity use are currently not covered by scope 3 reporting. The company has still not introduced any scope 3 reduction targets.

In 2023, Platzer also introduced a new energy intensity target to reduce property portfolio energy intensity below 70 kWh/sqm by 2025 (in 2022, it reported an energy intensity of 78,5kWh/sqm). The target was set by the head of sustainability together with technical managers. Platzer believes having a target based on specific energy use in its property portfolio rather than a general 2% reduction annually helps the organization to work in a more efficient way and to focus on where energy efficiency projects have the largest effects. The target is based on like-for-like figures and not absolute energy usage. In 2022, it performed multiple measures to reduce energy use in its portfolio, such as installing new energy management and monitoring systems for all assets that had outdated systems, and to perform energy efficiency measures (such as changing lighting and installing solar panels).

Further, Platzer has been working on how it can reach its carbon neutral property management target. The target covers scope 1 and 2 emissions, and includes emissions associated with its activities within property management such as district heating and landlord electricity (covering energy posts such as lifts, common areas, etc.) The target does not include tenant electricity use. To reach its target, it has identified some measures where it has direct control, while some of the emission reductions are dependent on external parties, such as its district heating suppliers. It informs us it is in dialogue with these suppliers about their emissions intensity; however the company shared that it may need to use carbon offsetting or removals to become climate neutral if its district heating suppliers do not reduce their emissions.

In 2023, Platzer set a target to include recycled or reused materials in all projects. While the work to introduce circularity in its projects had already started, it is now working on how to systemize and structure the work so that it can be implemented for all projects and to make it easier to track and monitor climate impact. It has set a working group that has as mandate to work on these processes. Parts of this work has been looking at developing inventory apps to be able to track the type of materials and objects it has recovered from previous projects for potential reuse. Most of Platzer's projects are tenant adaptations, which are often minor renovations of interior spaces. A priority in its work with circularity is to assess how to handle vacant premises, especially which materials in the premises it wishes to keep when a new tenant moves in. Further, Platzer provides its tenants with suggestions of products for such adaptations and is looking at introducing a climate dimension to these suggestions, so as to nudge its tenants to consider climate impact when choosing design and products.

Platzer informs us, as new agreements with new suppliers are being signed, its code of conduct is being included in all processes. Platzer expect this to enable it to work with its suppliers more systematically. The company is considering setting higher demands for suppliers to decrease emissions for construction projects but has not given any indication of how much more stringent they may become or by when they expect to do so.

While Platzer previously has assessed physical climate risks associated with the areas where most of its properties are clustered, in 2023 it has started to perform such assessment on a property level. It has considered the requirements of Appendix A of the EU Taxonomy DNSH criteria for climate adaptation and, with help from external consultants, has performed the assessments based on standardized processes. In these assessments, new risks such as erosion, avalanches, and hurricanes, in addition to risks addressed in the previous assessment, have now been analyzed on a property level. Platzer expects to have all assessments completed by Q3 2023. Moving forward, the physical climate risk assessment will be performed when acquiring new assets. After the assessments have been completed, the next steps will be to identify the measures needed to mitigate identified risks as well as setting up an action plan to implement such measures. When selling assets, Platzer will provide potential buyers with the assessment so they can be aware of potential physical climate risks and continue with adaptation measures if needed.

Platzer has been working on a sustainability framework for its new construction and larger renovations projects. The framework formalizes the requirement for projects to be aligned with the EU taxonomy criteria for substantial contribution as described in the activities 7.1 New construction and 7.2 Renovation of buildings. Platzer informs us that with time the framework might address the DNSH criteria, however, for now the DNSH criteria will be addressed on a case-by-case basis. The framework will also cover ecosystem services (such as biodiversity) that need to be taken into consideration for projects. The framework will be presented to contractors and partners and will be mandatory to follow for new projects.

### Key performance indicators

Table 3: Energy Mix for Platzer				
	Total (GWh)	District heating and cooling (GWh)	Electricity (GWh)	
Main targets	-2% p.a.			
2022	74.1	45.3 (61% of total)	28.9 (39% of total)	
2021	71.8	43.9 (61% of total)	27.9 (39% of total)	
2020	74.9	42.8 (57% of total)	32.2 (43% of total)	
2019	86.2	44.0 (51% of total)	42.2 (49% of total)	
Change 2021-2022	+3%	+3%	+4%	

Platzer's total energy use increased by 3% in 2022, explained by the acquiring and finalization of new properties, increasing the total size of the portfolio. According to its annual report, the energy consumption in comparable property (the like-for-like portfolio) declined by 6.7% in 2022 compared to 2021. According to Platzer, the decrease was the result of investing in new energy monitoring systems, working actively to improve energy management, and energy efficiency measures.

Table 4: Platzer's CO <sub>2</sub> -emissions and main CO <sub>2</sub> -emission reduction targets					
Emissions	Total (tons CO <sub>2</sub> e <sup>4</sup> )	Scope 1	Scope 2	Scope 3	Specific emissions (emissions
Main Targets			to have a climate neutral (scope 1 and scope 2).*	Measure more categories of scope 3 and work systematically to reduce emissions, especially those we can influence.	0.5
2022	5804	175	395	5234	0.7
2021	692	283	408	1	0.8
2020	546	238	309	1	0.7
Change 2021-2022	+739%	-38%	-3%	+523300%	-13%

Shades of Green Company Assessment update for Platzer

 $<sup>^4</sup>$  CO<sub>2</sub>e, carbon dioxide equivalent, is a measurement term for greenhouse gas accounting.

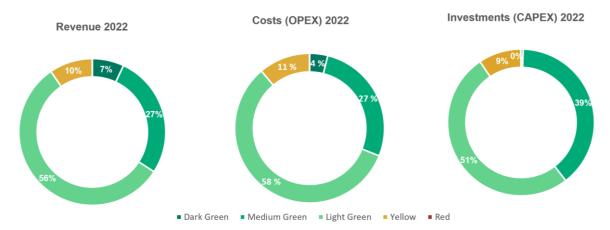
Own cars and pool	District heating.	Business travel and capital	
cars, refrigerants.	Emission factors	goods in tenant adaptations.	
Data and emission	from its energy	Emissions from	
factors from	suppliers, Göteborgs	construction projects-	
Swedish Transport	Energi, Möndal	tenant adaptions are	
Agency, Swedish	energi and Solör	calculated using an	
Cooling and Heat	Energi. Emissions	emissions factor for climate	
Pump Association,	associated with	impact per square meter of	
mileage data from	electricity use are	tenant adaptation multiplied	
Abax provider of	market-based,	by the volume of adapted	
its digital driving		square metres in the year.	
journal.		The emissions factor is	
		based on an actual climate	
		calculation on one of its	
		construction projects -	
		tenant adaptation performed	
		in 2022.	

The key factor to the increase in scope 3 emissions in 2022 is that Platzer introduced more comprehensive scope 3 emission reporting. While in 2020 and 2021 it only reported emissions from business travel, it now also includes capital goods in tenant adaptations. Therefore, one cannot compare 2021 and 2022 scope 3 emission data, nor total emissions. Emissions from bigger constructions projects and tenant electricity use are currently not covered by scope 3 reporting.

In Platzer's annual report, it reports that scope 1 and 2 emissions in the like-for-like portfolio declined by 18% in 2022 compared to 2021. While scope 2 emissions are largely the same in 2022, with a 3% decrease compared to 2021, scope 1 emissions decreased by 38%. According to Platzer, the decrease was the result of reduced leakage from refrigerants (170 tonnes in 2022 compared with 269 tonnes in 2021). In 2022, Platzer also adjusted the emission factor for company cars that run on natural biogas, which resulted in a decrease in its scope 1 emissions. The minor decrease in scope 2 emissions is caused by using updated emission factors for 2022 for electricity and district heating.

# 2 Assessment of Platzer's revenues and investments

### Shading of Plazer's revenue, operating expenses and investments





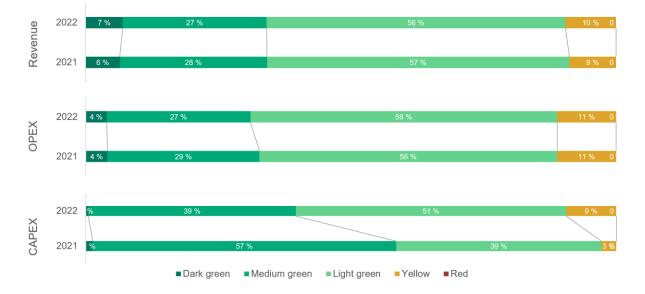
Using the previous 2021 shading methodology, the Shade of Green assigned to Platzer's properties reflects the energy use of the building, the level of environmental certification, and the management of physical climate risks. Platzer is well aware of the physical risks to its portfolio. We have taken the age distribution of Platzer's portfolio into account. Platzer's real estate portfolio has an average age of over 40 years, and the oldest building in the portfolio is from 1729 (refurbished in 1960). From a climate perspective, it is better to maintain existing buildings rather than build new properties, especially in regions with a large share of renewables in the electricity grid. Higher demands on energy efficiency would therefore be required for a portfolio consisting of newer building. The average energy intensity of Platzer's portfolio is 79 kWh/m<sup>2</sup>. From a 2050 perspective, this needs to improve over time. Buildings that contribute towards this improvement or have other environmental benefits, as demonstrated by a high level of green building certification, are assessed as green.

**Dark Green** is assigned to properties with an environmental certificate of BREEAM Outstanding, BREEAM Excellent or LEED Platinum and with an energy use less than the Platzer average of 79 kWh/m<sup>2</sup>. Without certification, the energy performance certificate needs to have an EPC-label of A or the property should have an energy use at or below 35 kWh/m<sup>2</sup> (roughly corresponding to 50% of the current Boverket's building regulations (BBR)).

**Medium Green** is assigned to properties with an environmental certificate of Green Building, Miljöbyggnad Silver, BREEAM Very Good or LEED Gold with an energy use of less than 79 kWh/m<sup>2</sup>. Properties without an environmental certificate will need as a minimum to have an energy use below 50 kWh/m<sup>2</sup> (roughly corresponding to 20% of current BBR) or an energy performance certificate of B.

**Light Green** is assigned to properties with an environmental certification of Green Building, BREEAM Excellent or Very Good, LEED Gold or Miljöbyggnad Silver, and for existing older buildings<sup>5</sup> with energy use below 81 kWh/m<sup>2</sup>. Some of the properties shaded Light Green have an energy intensity well above 79 kWh/m<sup>2</sup>. However, the many environmental benefits associated with the high level of BREEAM, LEED and Miljöbyggnad certification systems qualify the properties for the Light Green shade. The Green Building certification is focused on energy efficiency<sup>6</sup> alone. The criteria for certification are to either reduce energy efficiency in existing building by 25% or to the level of current BBR (which is below the average energy intensity in the Platzer portfolio). The buildings in Platzer's portfolio certified by Green Building have therefore demonstrated the considerable energy efficiency improvements required for the Light Green shade.

Yellow is allocated for properties that do not fulfil any of the criteria above. No assets in Platzer's portfolio have been shaded Red, the shade allocated to projects and solutions that have no role to play in a low-carbon and climate resilient future. These are the heaviest emitting assets, with the most potential for lock in of emissions and is generally not applicable to Nordic real estate.



# Figure 4: Comparison of shading of Platzer's revenues, operating expenses (OPEX), and investments (CAPEX) for 2021 and 2022.

Based on this approach, we find that 7% of revenues in 2022 came from assets considered Dark Green, up from 6% in 2021, 27% came from Medium Green, down from 28% in 2021, and 56% came from Light Green, down from 57% in 2021. Thus, the total share of assets given a Shade of Green stayed nearly the same in 2022 compared to 2021, where also the shares of different shades of green stayed relatively similar. Operating expenses are distributed similarly, where 4% are shaded Dark Green, 27% Medium Green and 58% are shaded Light Green, compared to 4%, 29%, and 56% in 2021. The total share of green investments decreased in 2022 to 91% from 97% in 2021, where the Shade of Green has shifted to lighter shades. This is primarily due to significant investments in a few Light Green properties. Six new construction projects were ongoing (three fully owned, three parts of a joint venture with Bockasjö.), all shaded Medium Green.

<sup>&</sup>lt;sup>5</sup> Interpreted as at least 10 years old.

<sup>&</sup>lt;sup>6</sup> Green Building started in 2004 as an EU initiative to improve energy efficiency and is now managed by the Swedish Green Building Council. https://www.sgbc.se/certifiering/greenbuilding/vad-ar-greenbuilding/

The shading in this update is based on the same methodology CICERO Shades of Green used in 2021 to allow for a comparison of Platzer's portfolio performance over time. Investors should be aware that our methodology is dynamic, as technology, regulations, and sector norms continuously evolve. If Platzer decides to complete a new full company assessment as required at the end of three years, we will use an updated methodology incorporating the latest sector information at that time.

Investors should note that our assessment is based on data reported or estimated by the company and has not always been verified by a third party. We analyse revenue, operating costs and investments, however there is typically not an explicit link between sustainability and financial data<sup>7</sup>. Our shading often requires allocating line items in financial statements to projects or products, for this we rely on the company's internal allocation methods. In addition, there are numerous ways to estimate, measure, verify and report e.g. data on emissions, which may make direct comparisons between companies or regulatory criteria difficult and somewhat uncertain.

### **Nasdaq Green Designation**

CICERO Shades of Green confirms that Platzer meets the requirements for Nasdaq Green Equity Designation set out in the Nasdaq Green Equity Principles.

In 2022, 90% of Platzer's turnover came from assets with some Shade of Green, exceeding the 50% threshold for green activities for company turnover. The sum of OPEX and CAPEX allocated a Shade of Green is 85%. This exceeds the 50% threshold for investments, defined as the sum of CAPEX and OPEX. In 2022, Platzer had no turnover assessed shaded Red, meeting the threshold of less than 5% of the company's turnover being derived from fossil fuel activities.

In addition, this report provides transparency on alignment of the company's activities with the EU Taxonomy and transparency on the company's environmental targets and KPIs is provide

<sup>&</sup>lt;sup>7</sup> Most accounting systems do typically not provide a break-down of revenue and investments by environmental impact, and the analysis may therefore include imprecisions and may not be directly comparable with figures in the annual reporting

### EU Taxonomy update

The mitigation criteria in the EU Taxonomy includes specific thresholds for the categories relevant to Platzer, which include:

- Acquisition and ownership of buildings
- Construction of new buildings
- Renovation of existing buildings
- Installation, maintenance and repair of energy efficiency equipment
- Installation, maintenance and repair of charging stations for electric vehicles in buildings and parking spaces attached to buildings
- Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings
- Installation, maintenance and repair of renewable energy technologies

Comments on alignment are given in the table below, and detailed thresholds, NACE-codes and likely alignment with DNSH criteria are given in Appendix 2.

Investors should note that our assessment of likely EU Taxonomy alignment, unlike our shading, has been updated this year to reflect new guidance from the Swedish Building Owners (Fastighetsägarna) on the top 15% of buildings in Sweden, which was established since the previous assessment.

Overall, we find likely shares of portfolio alignment with the EU Taxonomy as follows:

Table 5: Overall EU Taxonomy alignment (Technical Criteria + DNSH + minimum safeguards)	Revenue	OPEX	CAPEX
Total share eligible (activities covered by criteria)	100%	100%	100%
Total share likely aligned with Technical Criteria and DNSH Criteria	0%	0%	0%
Total share likely aligned to Technical Criteria for mitigation <sup>8</sup>	23%	18%	47%

Table 6: Economic Activity: Acquisition and ownership of buildings (7.7) (NACE Code L68)				
Technical Criteria	Full assessment from 2022	Updated comments on alignment		

DNSH-criteria	Fı	Ill assessment from 2022	Update	d comments on alignment
	~	Improved clarity from new national building stock energy performance thresholds allows for assessment		report defining the top 15 percent of the national building stock in Sweden.
	and CAPEX aligned to the substantial contribution criteria in 2021 was 58%, 62%, and 17%	$\checkmark$	criteria only was in 2022 23%, 18%, and 2%. Fastighetsägarna has published an updated	
Mitigation Criteria	✓ ✓	The eligible share of revenue, OPEX and CAPEX in 2021 was 89%, 89%, and 27% Likely aligned share of revenue, OPEX,	✓ ✓	The eligible share of revenue, OPEX and CAPEX in 2022 was 100%, 100% and 55,4% Likely aligned share of revenue, OPEX, and CAPEX aligned to the substantial contribution

<sup>&</sup>lt;sup>8</sup> Platzer's properties are likely aligned to all DNSH criteria except criteria on circular economy under the Construction of New Buildings and Renovation of Existing Buildings categories.

Likely aligned through IPCC scenario Platzer informs us that after further clarity from **Climate Change** analysis of risks to building clusters and Adaptation risk mitigation measures where needed

external consultants on what is asked in Appendix A, more risks needed to be evaluated and the assessments needed to be on a property level. As of now we assess that Platzer is likely not aligned, however when it completes the current physical climate risks assessments done on a property level it will likely be aligned.

Table 7: Economic Activity: Construction of New Buildings (7.1) (NACE Code F41.1, F41.2)				
Technical Criteria	Full assessment from 2022   U	Jpdated comments on alignment		
Mitigation Criteria	<ul> <li>CAPEX in 2021 was 7%, 3%, and 70%</li> <li>The eligible share of revenue, OPEX and ✓</li> <li>CAPEX aligned to the substantial contribution criteria in 2021 was 7%, 3%, and 70%</li> <li>✓</li> <li>One property's expected energy performance is likely aligned but still needs to be verified. With more information, likely alignment will be ✓ confirmed or may change.</li> </ul>	The eligible share of revenue, OPEX and CAPEX in 2022 was 0%, 0%, and 37% The eligible share of CAPEX aligned to the energy requirement for the substantial contribution criteria only in 2022 was 37% All properties expected energy performance is likely aligned but still needs to be verified. With more information, likely alignment will be confirmed or may change. All six buildings are bigger than 5000 m2. Platzer has the ambition to conduct the GWP calculations that are needed for alignment. Testing of airtightness is a requirement for BREEAM, Nordic Swan Ecolabel and Miljöbyggnad certifications.		

DNSH-criteria	Full assessment from 2022	Updated comments on alignment
Climate Change	Likely aligned	See comments under Acquisition and ownership of buildings
Adaptation		
Sustainable use and protection of water and marine	✓ Likely aligned	/ Likely aligned
Transition to a circular economy (circular	✓ Likely aligned to criteria on waster management	Not enough information
economy)	✓ Likely not aligned to criteria on circular	
Pollution prevention and control	✓ Likely aligned	Not enough information
Protection and restoration of biodiversity and ecosystems	✓ Likely aligned	Not enough information

 Table 8: Economic Activity: Renovation of existing buildings (7.2) (NACE Code F41 and F43)

 Technical Criteria Full assessment from 2022 Updated comments on alignment

Mitigation
Criteria

 $\checkmark$ CAPEX in 2021 was 4%, 8%, and 2%

- $\checkmark$  This is also the share aligned with the substantial contribution criteria  $\checkmark$
- The eligible share of revenue, OPEX and ✓ The eligible share of revenue, OPEX and CAPEX to the substantial contribution criteria only in 2022 was 0%, 0%, and 7%
  - This is also the share aligned with the substantial contribution criteria

DNSH-criteria	Fu	ll assessment from 2022	Up	dated comments on alignment
Climate Change Adaptation	✓	Likely aligned		See comments under Acquisition and ownership of buildings
Sustainable use and protection of water and marine	<b>√</b>	Likely aligned	~	Likely aligned
Transition to a circular economy (circular	~	Likely aligned on criteria on waste management	~	Not enough information
economy)	~	Likely not aligned to criteria on circular economy		
Pollution prevention and control	~	Likely aligned	~	Not enough information

### Table 9: Economic Activity: Installation, maintenance and repair of energy efficiency equipment (7.3) (NACE Codes F42, F43, M71, C16, C17, C22, C23, C25, C27, C28, S95.21, S95.22, or C33.12)

Technical Criteri	a F	ull assessment from 2022	U	pdated comments on alignment
Mitigation Criteria	✓ ✓ ✓	The eligible and likely aligned share of CAPEX in 2021 was 1.2% Likely aligned as lighting and ventilation efficiency improvements Likely aligned with energy efficiency requirements	✓ ✓ ✓	The eligible and likely aligned share of CAPEX to the substantial contribution criteria only in 2022 was 0,78% Likely aligned as lighting and ventilation efficiency improvements Likely aligned with energy efficiency requirements
DNSH-criteria	Fu	ll assessment from 2022	Up	odated comments on alignment
DNSH-criteria Climate Change Adaptation	Fu ✓	ll assessment from 2022 Likely aligned through IPCC scenario analysis of risks to building clusters and risk mitigation measures where needed	Up ✓	odated comments on alignment See comments under Acquisition and ownership of buildings

Table 10: Economic Activity: Installation, maintenance and repair of charging stations for electric vehicles in buildings and parking spaces attached to buildings (7.4) (NACE Codes F42, F43, M71, C16, C17, C22, C23, C25, C27 or C28) 

**Technical Criteria** Full assessment from 2022

Updated comments on alignment

Mitigation Criteria	✓ ✓	The eligible and likely aligned share of $\checkmark$ CAPEX in 2021 was 0.1% Likely aligned with requirements for installation of electric vehicle charging $\checkmark$ stations	The eligible and likely aligned share of CAPEX to the substantial contribution criteria only in 2022 was 0.04% Likely aligned with requirements for installation of	
DNSH-criteria	Fu		electric vehicle charging stations odated comments on alignment	
Climate Change Adaptation	✓	Likely aligned through IPCC scenario analysis of risks to building clusters and risk mitigation measures where needed	See comments under Acquisition and ownership of buildings	

Table 11: Economic Activity: Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings (7.5) (NACE Codes F42, F43, M71, and C16, C17, C22, C23, C25, C27, or C28)

Technical Criteri	a F	ull assessment from 2022	U	pdated comments on alignment
Mitigation Criteria	✓ ✓	The eligible and likely aligned share of CAPEX in 2021 was 0.2% Likely aligned as energy management		The eligible and likely aligned share of CAPEX to the substantial contribution criteria only in 2022 wa 0.10%
DNSH-criteria	Fu	systems Ill assessment from 2022	✓ Up	Likely aligned as energy management systems dated comments on alignment
Climate Change Adaptation	✓	Likely aligned through IPCC scenario analysis of risks to building clusters and risk mitigation measures where needed	•	See comments under Acquisition and ownership of buildings

Table 12: Economic Activity: Installation, maintenance and repair of renewable energy technologies (7.6)(NACE Codes F42, F43, M71, C16, C17, C22, C23, C25, C27 or C28)

Technical Criteri	a F	ull assessment from 2022	U	pdated comments on alignment
Mitigation Criteria	✓ ✓	The eligible and likely aligned share o CAPEX in 2021 was 0.1% Likely aligned as a solar photovoltain		The eligible and likely aligned share of CAPEX to the substantial contribution criteria only in 2022 was 0.28%
		system	✓	Likely aligned as a solar photovoltaic system
DNSH-criteria	Fu	ll assessment from 2022	Up	dated comments on alignment
Climate Change Adaptation	✓	Likely aligned through IPCC scenario analysis of risks to building clusters and risk mitigation measures where needed	✓	See comments under Acquisition and ownership of buildings

### 2 Terms and methodology

This analysis aims to be a practical tool for investors, lenders, and public authorities for understanding climate risk. CICERO Shades of Green encourages the client to make this annual update to the company assessment publicly available. If any part of the annual update or company assessment is quoted, the full report must be made available. Our annual assessment update, including governance, is relevant for the reporting year covered by the analysis. This annual assessment update is based on a review of documentation of the client's policies and processes, as well as information provided to us by the client during meetings, teleconferences, and email correspondence. In our review, we have relied on the correctness and completeness of the information made available to us by the company.

#### Shading corporate revenue and investments

Our view is that the green transformation must be financially sustainable to be lasting at the corporate level. Therefore, we have shaded the company's current revenue-generating activities, investments, and operating expenses.

The approach is an adaptation of the CICERO Shades of Green methodology for the green bond market. The Shade of Green allocated to a green bond framework reflects how aligned the likely implementation of the framework is to a low carbon and climate resilient future, and we have rated investments and revenue streams in this assessment similarly. We allocate a shade of green to the revenue stream and investments according to how these streams reflect alignment of the underlying activities to a low carbon and climate resilient future account governance issues.

	Shading	Examples
°C	<b>Dark Green</b> is allocated to projects and solutions that correspond to the long- term vision of a low-carbon and climate resilient future.	-'o'- Solar power plants
°C	<b>Medium Green</b> is allocated to projects and solutions that represent significant steps towards the long-term vision but are not quite there yet.	Energy efficient buildings
°C	<b>Light Green</b> is allocated to transition activities that do not lock in emissions. These projects reduce emissions or have other environmental benefits in the near term rather than representing low carbon and climate resilient long-term solutions.	Eo
°C	<b>Yellow</b> is allocated to projects and solutions that do not explicitly contribute to the transition to a low carbon and climate resilient future. This category also includes activities with too little information to assess.	Healthcare services
°C	<b>Red</b> is allocated to projects and solutions that have no role to play in a low- carbon and climate resilient future. These are the heaviest emitting assets, with the most potential for lock in of emissions and highest risk of stranded assets.	New oil

In addition to shading from dark green to red, CICERO Shades of Green also includes a governance score to show the robustness of the environmental governance structure. When assessing the governance of the company, CICERO Shades of Green looks at five elements: 1) strategy, policies, and governance structure; 2) lifecycle considerations

including supply chain policies and environmental considerations towards customers; 3) the integration of climate considerations into their business and the handling of resilience issues; 4) the awareness of social risks and the management of these, and 5) reporting. Based on these aspects, an overall grading is given on governance strength, falling into one of three classes: Fair, Good or Excellent. Please note this is not a substitute for a full evaluation of the governance of the issuing institution, and does not cover, e.g., corruption.

The EU Taxonomy, first introduced in 2020, seeks to set out common classification systems to determine the environmental sustainability of activities. The EU-taxonomy regulation<sup>9</sup> defines six environmental objectives. To be considered environmentally sustainable, an activity must substantially contribute to one or more of the six objectives, not significantly harm any of the other six objectives (Do-No-Significant-Harm - DNSH), and comply with the technical screening criteria (TSC). In June 2021, EU published its delegated acts outlining the TSC for climate adaptation and mitigation objectives, respectively, which it was tasked to develop after the Taxonomy Regulation entered into law in July 2020<sup>10</sup>.

CICERO Shades of Green has assessed potential alignment against the mitigation thresholds and the DNSH criteria in the delegated acts published in June 2021 in the assessment of the company carried out in 2021<sup>11</sup>.

In order to qualify as a sustainable activity under the EU regulation 2020/852 certain minimum safeguards must be complied with. The safeguards entail alignment with the OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights, including the International Labour Organisation's ('ILO') declaration on Fundamental Rights and Principles at Work, the eight ILO core conventions and the International Bill of Human Rights. CICERO Shades of Green has completed a light touch assessment of the above social safeguards with a focus on human rights and labor rights risks<sup>12</sup>. We take the sectoral, regional and judicial context into account and focus on the risks likely to be the most material social risk.

Our assessment of alignment against the EU Taxonomy is based on a desk review of the listed source documents against the Taxonomy Delegate Act and following our own shading methodology.

<sup>&</sup>lt;sup>9</sup> EU-Taxonomy regulation (2020/852), <u>https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32020R0852&from=EN</u> <sup>10</sup> taxonomy-regulation-delegated-act-2021-2800-annex-1\_en.pdf (europa.eu)

<sup>&</sup>lt;sup>11</sup> https://www.spglobal.com/\_assets/documents/ratings/research/sog/company-assessment-green-platzer-fastigheter-07-june-2021.pdf

<sup>&</sup>lt;sup>12</sup> CICERO Shades of Green is in the process of further developing its assessment method to ensure that it encompasses the object and purpose of the minimum safeguards.



#### **About CICERO Shades of Green**

CICERO Shades of Green, now a part of S&P Global, provides independent, research-based second party opinions (SPOs) of green financing frameworks as well as climate risk and impact reporting reviews of companies. At the heart of all our SPOs is the multi-award-winning Shades of Green methodology, which assigns shadings to investments and activities to reflect the extent to which they contribute to the transition to a low carbon and climate resilient future.

CICERO Shades of Green Company Assessments indicate the greenness of a company by providing a shading of revenues, operating costs and capital expenditures, as well as an assessment the company's governance structure. CICERO Shades of Green also provides second opinions on institutions' frameworks and guidance for assessing and selecting eligible projects for green, sustainability and sustainability-linked bond investments. CICERO Shades of Green is internationally recognized as a leading provider of independent reviews of green bonds, since the market's inception in 2008. CICERO Shades of Green is independent of the company being assessed, its directors, senior management and advisers, and is remunerated in a way that prevents any conflicts of interests arising as a result of the fee structure. CICERO Shades of Green operates independently from the financial sector and other stakeholders to preserve the unbiased nature and high quality of assessments.

2021 Largest External Reviewer, Climate Bonds Initiative Awards

Environmental Finance Bond Awards 2022 Winner External assessment provider of the year 2020 External Assessment Provider Of The Year, Environmental Finance Green Bond Awards
 2020 Largest External Review Provider In Number Of Deals, Climate Bonds Initiative Awards
 2019 External Assessment Provider Of The Year, Environmental Finance Green Bond Awards
 2019 Largest Green Bond SPO Provider, Climate Bonds Initiative Awards
 2018 External Assessment Provider Of The Year, Environmental Finance Green Bond Awards
 2018 External Assessment Provider Of The Year, Environmental Finance Green Bond Awards
 2018 Largest External Reviewer, Climate Bonds Initiative Awards
 2018 Largest External Reviewer, Climate Bonds Initiative Awards

2016 Most Second Opinions, Climate Bonds Initiative Awards

°C

# **Appendix 1: Referenced documents list**

Document Number	Document Name	Description
1	Data collection sheet	Financial numbers from 2022 and descriptions of Platzer's activities, provided to us by request.
2	Sustainability report from 2022	
3	Platzer company assessment update 2022 (spglobal.com)	



### **Appendix 2: EU Taxonomy criteria and alignment**

Complete details of the EU taxonomy criteria are given in taxonomy-regulation-delegated-act-2021-2800-annex-1 en.pdf (europa.eu)

Framework activity	Green buildings						
Taxonomy activity	Acquisition and ownership of buildings (NACE Code L68)						
	EU Technical mitigation criteria	Comments on alignment	Alignment				
Mitigation criteria	<ul> <li>Substantial contribution to climate change mitigation</li> <li>Acquisition and ownership of buildings, eligible if:</li> <li>For buildings built before 31 December 2020, the building has at least Energy Performance Certificate (EPC) class A. As an alternative, the building is within the top 15% of the national or regional building stock expressed as operational Primary Energy Demand (PED) and demonstrated by adequate evidence, which at least compares the performance of the relevant asset to the performance of the national or regional stock built before 31 December 2020 and at least distinguishes between residential and non-residential buildings.</li> <li>For buildings built after 31 December 2020, the building meets the criteria set out for the activity 'construction of new buildings'.</li> <li>Where the building is a large non-residential building<sup>13</sup> it is efficiently operated through energy performance monitoring and assessment.</li> </ul>	<ul> <li>Comments on alignment</li> <li>We consider a report from Fastighetsägarna to provide adequate evidence for the energy efficiency of the top 15 percent of the national building stock. Fastighetsägarna has published an updated report defining the top 15 percent of the national building stock in Sweden. <sup>14</sup></li> <li>All properties are assessed to be likely aligned with the energy management criteria</li> </ul>	Alignment The eligible share of revenue, OPEX and CAPEX in 2022 was 100%, 100% and 55,4% Likely aligned share of revenue, OPEX, and CAPEX aligned to the substantial contribution criteria was in 2022 23%, 18%, and 2%.				
			2022				

### Acquisition and ownership of buildings (7.7)

<sup>&</sup>lt;sup>13</sup> With an effective rated output for heating systems, systems for combined space heating and ventilation, air-conditioning systems or systems for combined air-conditioning and ventilation of over 290 kW. <sup>14</sup> Topp 15 och 30% (fastighetsagarna.se)



	<ul> <li>The Primary Energy Demand is at least 10 % lower than the threshold set for the nearly zero-energy building (NZEB) requirements in national regulation.</li> <li>The energy performance is certified using an Energy Performance Certificate (EPC).</li> <li>EU Taxonomy DNSH-criteria</li> </ul>	Comments on alignment	Alignment
Climate change adaptation	<ul> <li>Physical climate risks material to the activity should be identified (chronic and acute, related to temperature, wind, water, and soil) by performing a robust climate risk and vulnerability assessment.</li> <li>The assessment should be proportionate to the scale of the activity and its expected lifespan, such that:         <ul> <li>a) for investments into activities with an expected lifespan of less than 10 years, the assessment is performed, at least by using downscaling of climate projections;</li> <li>b) for all other activities, the assessment is performed using high resolution, state-of-the-art climate projections across a range of future scenarios consistent with the expected lifetime of the activity, including, at least, 10 to 30 years climate projections scenarios for major investments.</li> </ul> </li> <li>The economic operator has developed a plan to implement adaptation solutions to reduce material physical climate risks to the activity. The adaptation solutions identified need to be implemented within five years from the start of the activity. These adaptation solutions do not adversely affect the adaptation efforts or the level of resilience to physical climate risks of other people, of nature, of assets and of other economic activities and are consistent with local, sectoral, regional or national adaptation efforts.</li> </ul>	• Platzer has started to perform assessment on a property level, where it has considered what is asked for in Appendix A of the EU Taxonomy DNSH criterion in objective 2. Assessments are done with help from external consultants and are based on standardized processes. It is expecting to have all assessments completed by Q3 in 2023. Moving forward, the physical climate risk assessment will be performed when acquiring new assets. When selling assets, it will provide potential buyers with the assessment so they can be aware of potential physical climate risks and continue with adaptation measures if needed. After the assessments have been completed, the next steps will be to see what type of measures that need to be implemented to mitigate identified risks as well as setting up an action plan to perform such measures.	Likely not aligned While we assess Platzer to likely not be aligned for all assets as of now, when it has completed its work on physical climate risks assessments, we assess that it likely will be aligned

### **Construction of new buildings (7.1)**

Framework activity	Green buildings		
Taxonomy activity	Construction of new buildings (NACE Code F41.1, F41.2)		
	EU Technical mitigation criteria	Comments on alignment	Alignment



Technical screening criteria	<ul> <li>Substantial contribution to climate change mitigation</li> <li>Constructions of new building, eligible if:</li> <li>The Primary Energy Demand is at least 10 % lower than the threshold set for the nearly zero-energy building (NZEB) requirements in national regulation. The energy performance is certified using an as built Energy Performance Certificate (EPC).</li> <li>For buildings larger than 5000 m<sup>2</sup>, upon completion, the building resulting from the construction undergoes testing for air-tightness and thermal integrity, and any deviation in the levels of performance set at the design stage or defects in the building envelope are disclosed to investors and clients. As an alternative; where robust and traceable quality control processes are in place during the construction process this is acceptable as an alternative to thermal integrity testing.</li> <li>For buildings larger than 5000 m<sup>2</sup>, the life cycle Global Warming Potential of the building resulting from the construction the construction has been calculated for each stage in the life cycle and is disclosed to investors and clients on demand.</li> </ul>	<ul> <li>Contextual information</li> <li>Energy requirements set in BBR (Swedish building regulations) is defined as NZEB in Sweden.</li> <li>In Sweden, climate calculations establishing the GWP for the construction phase are a regulatory requirement since 1. January 2022. The requirement is only valid for properties seeking a construction permit after January 1, 2022. This only covers phase A of construction, while the criterion in the taxonomy refers to phase A-C.</li> <li>Testing of airtightness is a requirement for BREEAM, Nordic Swan Ecolabel and Miljöbyggnad certifications.</li> <li>In 2022, Platzer has investment related to 6 properties that are considered new construction.</li> </ul>	The eligible share of revenue, opex and capex in 2022 was 0%, 0%, and 37% Likely aligned share of revenue, OPEX, and CAPEX aligned to the substantial contribution criteria was in 2022 0%, 0%, and 37%.
	EU Taxonomy DNSH-criteria	Comments on alignment	Alignment
Climate change adaptation	Please refer to Acquisition and ownership of buildings	See comments under Acquisition and ownership of buildings	Likely not aligned
Sustainable use and protection of water and marine resources	<ul> <li>Where installed, except for installations in residential building units, the specified water use for the following water appliances are attested by product datasheets, a building certification or an existing product label<sup>15</sup> in the Union, in accordance with the technical specifications:</li> <li>(a) wash hand basin taps and kitchen taps have a maximum water flow of 6 litres/min;</li> <li>(b) showers have a maximum water flow of 8 litres/min;</li> <li>(c) WCs, including suites, bowls and flushing cisterns, have a full flush volume of a maximum of 6 litres;</li> <li>(d) urinals use a maximum of 2 litres/bowl/hour. Flushing urinals have a maximum full flush volume of 1 litre.</li> </ul>	<ul> <li>Platzer confirmed their new construction properties will meet the water appliance efficiency requirements.</li> <li>Platzer has informed us that new construction will be in compliance with the EU Water Framework Directive.</li> </ul>	Likely aligned

<sup>&</sup>lt;sup>15</sup> The Taxonomy is referring to Appendix E in the Taxonomy Annex 1.



Transition to a circular economy (circular economy)	<ul> <li>To avoid impact from the construction site, the activity complies with the criteria in the EU Water Framework Directive<sup>16</sup>.</li> <li>Where an Environmental Impact Assessment is carried out in accordance with Directive 2011/92/EU<sup>17</sup> and includes an assessment of the impact on water in accordance with the Water Framework Directive, no additional assessment of impact on water is required, provided the risks identified have been addressed.</li> <li>At least 70 % (by weight) of the non-hazardous construction and demolition waste (excluding naturally occurring material<sup>18</sup>) generated on the construction site is prepared for re-use, recycling and other material recovery, including backfilling operations using waste to substitute other materials.</li> <li>Operators limit waste generation in processes related to construction and demolition to enable removal and safe handling of hazardous substances and facilitate reuse and high-quality recycling by selective removal of materials, using available sorting systems for construction and demolition waste.</li> <li>Building designs and construction techniques support circularity and in particular demonstrate how they are designed to be more resource efficient (with reference to ISO 208872<sup>19</sup>), adaptable, flexible and dismantlable to enable reuse and recycling.</li> </ul>	<ul> <li>Platzer has confirmed that less than 30 % of construction waste is landfilled, and informs us that its internal goal is that at least 85% of waste shall be sorted. However, as in Sweden some sorted waste is sent for incineration to district heating facilities, it cannot confirm that 70% is prepared for re-use, recycling or material recovery excluding incineration.</li> <li>Platzer has joined a local circular construction initiative and begun discussing modular, multipurpose product development and reducing waste with suppliers and clients. However, it has not yet fully implemented circular economy thinking into their design or construction techniques.</li> <li>It lacks national KPIs to judge whether projects fulfil the criteria set out in the taxonomy that building designs and construction techniques support circularity and in particular demonstrate how they are designed to be more resource efficient, adaptable, flexible and dismantlable to enable reuse and recycling.</li> </ul>	Not enough information
Pollution prevention and control	Building components and materials used in the construction comply with the criteria set out in Appendix C to the Taxonomy Annex 1.	<ul> <li>Two Swedish sector organisations (Fastighetsägarna and Byggindustrierna) are currently leading the process of getting sector-specific interpretations to Appendic C. There is</li> </ul>	Not enough information

<sup>&</sup>lt;sup>16</sup> Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy

<sup>&</sup>lt;sup>17</sup> DIRECTIVE 2011/92/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the assessment of the effects of certain public and private projects on the environment. <sup>18</sup> Refer to the European List of Waste established by Commission Decision 2000/532/EC

<sup>&</sup>lt;sup>19</sup> ISO 20887:2020, Sustainability in buildings and civil engineering works - Design for disassembly and adaptability - Principles, requirements and guidance (version of [adoption date]: https://www.iso.org/standard/69370.html).



	•	For building components and materials used in the construction that may come into contact with occupiers formaldehyde emissions are within relevant limits <sup>20</sup> . Where the new construction is located on a potentially contaminated site (brownfield site), the site has been subject to an investigation for potential contaminants <sup>21</sup> . Measures are taken to reduce noise, dust and pollutant emissions during construction or maintenance works.	•	currently a lack of information to judge if Platzer fulfil the criteria. Platzer has a list of materials they have approved for use in their projects. Environmental considerations are key in evaluating which materials make it on the list. In Platzer's projects, the end-clients only get a few alternatives when customizing the building. These alternatives are carefully picked out by Platzer with focus on ensuring that the materials used are the most sustainable options available. Platzer uses Byggvarubedömningen to support this process. Platzer has confirmed that they would investigate brownfield sites and preform decontamination if needed. Platzer confirms that they take appropriate measures to reduce noise, dust and pollutant emissions during construction or maintenance works.	
Protection and restoration of biodiversity and ecosystems	•	An Environmental Impact Assessment (EIA) or screening should be completed in accordance with national provisions <sup>22</sup> . Where an EIA has been carried out, the required mitigation and compensation measures for protecting the environment are implemented. For sites/operations located in or near biodiversity-sensitive areas (including the Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas, as well as other protected areas), an appropriate assessment where applicable, has been conducted and based on its conclusions the necessary mitigation measures are implemented. The new construction should not be built on one of the following: a) arable land and crop land;	•	Swedish trade associations are currently seeking clarity on the DNSH as further guidance is needed before concluding on alignment. In Sweden, general planning is the responsibility of the municipality and EIAs will be carried out on municipality level. Land that is covered by area protection according to the Planning and Building Act is Natura 2000, nature reserves and animal and plant protection areas, and construction is not permitted. This is stated in the general and detailed plan for each municipality. Before construction on new land is permitted, the builder needs to prepare a detailed plan and receive a building permit.	Not enough information

<sup>&</sup>lt;sup>20</sup> Emit less than 0,06 mg of formaldehyde per m<sup>3</sup> of material or component and less than 0,001 mg of categories 1A and 1B carcinogenic volatile organic compounds per m<sup>3</sup> of material or component, upon testing in accordance with CEN/TS 16516522 and ISO 16000-3 523 or other comparable standardised test conditions and determination method.

<sup>&</sup>lt;sup>21</sup> Standard ISO 18400 can be used.

<sup>&</sup>lt;sup>22</sup> The Taxonomy is referring to Appendix D in the Taxonomy Annex 1.



<ul> <li>b) greenfield land of recognised high biodiversity value and land that serves as habitat of endangered species (flora and fauna) listed on the European Red List or the IUCN Red List.</li> <li>c) land matching the definition of forest as set out in national law used in the national greenhouse gas inventory, or where not available, is in accordance with the FAO definition of forest<sup>23</sup>.</li> </ul>	The company has confirmed that they have no properties on arable land.
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### Renovation of existing buildings (7.2)

Framework activity	Green buildings		
Taxonomy activity	Renovation of existing buildings (NACE code F41 and F43)		
	EU Technical mitigation criteria	Comments on alignment	Alignment
Technical screening criteria	<ul> <li>Substantial contribution to climate change mitigation</li> <li>Renovation of existing buildings, eligible if:</li> <li>The building renovation complies with the applicable requirements for major renovations<sup>24</sup></li> <li>Alternatively, the reduction of primary energy demand (PED) must be at least 30 %.</li> </ul>	• In 2022, Platzer undertook two renovation projects. None of these projects are completed, however Platzer informs us that they both indicate a PED reduction of greater than 30%.	The eligible share of revenue, opex and capex in 2022 was 0%, 0%, and 7% Likely aligned share of revenue, OPEX, and CAPEX aligned to the substantial contribution criteria was in 2022 0%, 0%, and 7%.
	EU Taxonomy DNSH-criteria	Comments on alignment	Alignment
Climate change adaptation	• Please refer to Acquisition and ownership of buildings.	• See comments under Acquisition and ownership of buildings	Likely not aligned
Sustainable use and protection of water and marine resources	• Where installed, except for installations in residential building units, the specified water use for the following water appliances are attested	• Platzer confirmed their renovated property will meet the water appliance efficiency requirements.	Likely aligned

<sup>&</sup>lt;sup>23</sup> Land spanning more than 0,5 hectares with trees higher than five meters and a canopy cover of more than 10 %, or trees able to reach those thresholds in situ. It does not include land that is predominantly under agricultural or urban land use, FAO Global Resources Assessment 2020. Terms and definitions. (Version of [adoption date]: http://www.fao.org/3/I8661EN/i8661en.pdf).

<sup>&</sup>lt;sup>24</sup> As set in the applicable national and regional building regulations for 'major renovation' implementing Directive 2010/31/EU. The energy performance of the building or the renovated part that is upgraded meets cost-optimal minimum energy performance requirements in accordance with the respective directive

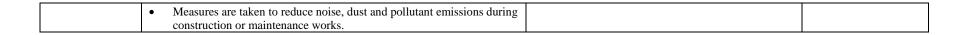


	<ul> <li>by product datasheets, a building certification or an existing product label<sup>25</sup> in the Union, in accordance with the technical specifications:</li> <li>(a) wash hand basin taps and kitchen taps have a maximum water flow of 6 litres/min;</li> <li>(b) showers have a maximum water flow of 8 litres/min;</li> <li>(c) WCs, including suites, bowls and flushing cisterns, have a full flush volume of a maximum of 6 litres and a maximum average flush volume of 3,5 litres;</li> <li>(d) urinals use a maximum full flush volume of 1 litre.</li> </ul>		
Transition to a circular economy (circular economy)	<ul> <li>At least 70 % (by weight) of the non-hazardous construction and demolition waste (excluding naturally occurring material<sup>26</sup>) generated on the construction site is prepared for re-use, recycling and other material recovery, including backfilling operations using waste to substitute other materials.</li> <li>Operators limit waste generation in processes related to construction and demolition in accordance with the EU Construction and Demolition Waste Management Protocol and taking into account best available techniques and using selective demolition to enable removal and safe handling of hazardous substances and facilitate reuse and high-quality recycling by selective removal of materials, using available sorting systems for construction and demolition waste.</li> <li>Building designs and construction techniques support circularity and in particular demonstrate how they are designed to be more resource efficient (with reference to ISO 208872<sup>27</sup>), adaptable, flexible and dismantlable to enable reuse and recycling.</li> </ul>	See comments under Construction of New buildings	Not enough information
Pollution prevention and control	<ul> <li>Building components and materials used in the construction comply with the criteria set out in Appendix C to the Taxonomy Annex 1.</li> <li>Building components and materials used in the construction that may come into contact with occupiers emit less than 0,06 mg of formaldehyde per m<sup>3</sup> of material or component and less than 0,001 mg of carcinogenic volatiles<sup>28</sup>.</li> </ul>	See comments under Construction of New buildings	Not enough information

 $<sup>^{25}</sup>$  The Taxonomy is referring to Appendix E in the Taxonomy Annex 1.  $^{26}$  Refer to the European List of Waste established by Commission Decision 2000/532/EC

<sup>&</sup>lt;sup>27</sup> ISO 20887:2020, Sustainability in buildings and civil engineering works - Design for disassembly and adaptability - Principles, requirements and guidance (version of [adoption date]: https://www.iso.org/standard/69370.html).

<sup>&</sup>lt;sup>28</sup> Categories 1A and 1B carcinogenic volatile organic compounds per m<sup>3</sup> of material or component, upon testing in accordance with CEN/TS 16516522 and ISO 16000-3 523 or other comparable standardised test conditions and determination method.



### Installation, maintenance and repair of energy efficiency equipment (7.3)

°CICERO

Green

Shades of now a part of S&P Global

Taxonomy activity	Installation, maintenance and repair of energy efficiency equipment (NACE Codes F42, F43, M71, C16, C17, C22, C23, C25, C27, C28, S95.21, S95.22, or C33.12)				
	EU Technical mitigation criteria	Comments on alignment	Alignment		
Mitigation criteria	• Substantial contribution to climate change mitigation Installation, maintenance and repair of energy efficiency equipment, eligible if:	• Platzer informs us that during 2022 it did energy efficiency measures such as the installation of energy efficient light sources, ventilation and fans.	Likely aligned		
	<ul> <li>The activity consists in one of the following individual measures provided that they comply with minimum requirements set for individual components and systems in the applicable national measures implementing Directive 2010/31/EU and, where applicable, are rated in the highest two populated classes of energy efficiency in accordance with Regulation (EU) 2017/1369 and delegated acts adopted under that Regulation:         <ul> <li>Addition of insulation to existing envelope components, such as external walls (including green valls), roofs (including green roofs), lofts, basements and ground floors (including measures to ensure airtightness, measures to reduce the effects of thermal bridges and scaffolding) and products for the application of the insulation to the building envelope (including mechanical fixings and adhesive).</li> <li>Replacement of existing external doors with new energy efficient windows.</li> <li>Installation and replacement of energy efficient light sources.</li> <li>Installation, replacement, maintenance and repair of heating, ventilation and air conditioning (HVAC) and water heating systems, including equipment related to</li> </ul> </li> </ul>				



	<ul> <li>district heating services, with highly efficient technologies.</li> <li>Installation of low water and energy using kitchen and sanitary water fittings which comply with technical specifications set out in Appendix E to this Annex and, in case of shower solutions, mixer showers, shower outlets and taps, have a max water flow EN 173 EN of 6 L/min or less attested by an existing label in the Union market.</li> </ul>		
	EU Taxonomy DNSH-criteria	Comments on alignment	Alignment
Climate change adaptation	Please refer to Acquisition and ownership of buildings.	• See comments under Acquisition and ownership of buildings.	Likely not aligned
Pollution prevention and control	<ul> <li>In case of addition of thermal insulation to an existing building envelope, a building survey is carried out in accordance with national law by a competent specialist with training in asbestos surveying. Any stripping of lagging that contains or is likely to contain asbestos, breaking or mechanical drilling or screwing or removal of insulation board, tiles and other asbestos containing materials is carried out by appropriately trained personnel, with health monitoring before, during and after the works, in accordance with national law.</li> <li>The activity meets generic criteria for DNSH to pollution prevention and control regarding use and presence of chemicals, such that the activity does not lead to the manufacture, placing on the market or use of:         <ul> <li>a) Substances, whether on their own, in mixtures or in articles, listed in Annexes I or II to Regulation (EU) 2019/1021 of the European Parliament and of the Council, except in the case of substances present as an unintentional trace contaminant.</li> <li>b) Mercury and mercury compounds, their mixtures and mercury-added products as defined in Article 2 of Regulation (EU) 2017/852 of the European Parliament and of the Council.</li> </ul> </li> </ul>	<ul> <li>Thermal insulation will not be part of these efforts.</li> <li>According to Platzer, lighting efficiency upgrades will meet generic criteria for pollution prevention and control.</li> </ul>	Likely aligned



c)	Substances, whether on their own, in mixture	
	or in articles, listed in Annexes I or II to	
	Regulation (EC) No 1005/2009 of the	
	European Parliament and of the Council.	
d)	Substances, whether on their own, in	
	mixtures or in an articles, listed in Annex II	
	to Directive 2011/65/EU of the European	
	Parliament and of the Council, except where	
	there is full compliance with Article 4(1) of	
	that Directive.	
e)	Substances, whether on their own, in	
	mixtures or in an article, listed in Annex	
	XVII to Regulation (EC) 1907/2006 of the	
	European Parliament and of the Council332,	
	except where there is full compliance with the	
	conditions specified in that Annex.	
f)	Substances, whether on their own, in	
	mixtures or in an article, meeting the criteria	
	laid down in Article 57 of Regulation (EC)	
	1907/2006 and identified in accordance with	
	Article 59(1) of that Regulation, except where	
	their use has been proven to be essential for	
	the society.	
g)	Other substances, whether on their own, in	
	mixtures or in an article, that meet the criteria	
	laid down in Article 57 of Regulation (EC)	
	1907/2006, except where their use has been	
	proven to be essential for the society.	

### Installation, maintenance and repair of charging stations for electric vehicles in buildings and parking spaces attached to buildings (7.4)

Taxonomy activity	Installation, maintenance and repair of charging stations for electric vehicles in buildings and parking spaces attached to buildings (NACE Codes F42, F43, M71, C16, C17, C22, C23, C25, C27 or C28)		
	EU Technical mitigation criteria	Comments on alignment	Alignment
Mitigation criteria	<ul> <li>Substantial contribution to climate change mitigation</li> <li>Installation, maintenance and repair of charging stations for electric vehicles in buildings and parking spaces attached to buildings, eligible if:</li> <li>Charging stations for electric vehicles.</li> </ul>	• Platzer installed three charging stations on three different properties in 2022.	Likely aligned as electric vehicle charging stations



		EU Taxonomy DNSH-criteria	Com	nments on alignment	Alignment
Climate change adaptation	•	Please refer to Acquisition and ownership of buildings.	٠	See comments under Acquisition and ownership of buildings.	

# Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings (7.5)

Taxonomy activity	Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings (NACE Codes F42, F43, M71, and C16, C17, C22, C23, C25, C27, or C28)			
	EU Technical mitigation criteria	Comments on alignment	Alignment	
Mitigation criteria	<ul> <li>Substantial contribution to climate change mitigation</li> <li>Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of building, eligible if consisting of one of the following measures:</li> <li>Zoned thermostats, smart thermostat systems and sensing equipment, including. motion and day light control.</li> <li>Building automation and control systems, building energy management systems (BEMS), lighting control systems and energy management systems (EMS).</li> <li>Smart meters for gas, heat, cool and electricity.</li> <li>Façade and roofing elements with a solar shading or solar control function, including those that support the growing of vegetation.</li> </ul>	• Platzer plans to install energy monitoring systems at five of its sites.	Likely aligned as energy management systems	
	EU Taxonomy DNSH-criteria	Comments on alignment	Alignment	
Climate change adaptation	Please refer to Acquisition and ownership of buildings.	• See comments under Acquisition and ownership of buildings.		

### Installation, maintenance and repair of renewable energy technologies (7.6)

Taxonomy	Category (NACE Code F42, F43, M71, C16, C17, C22, C23, C25, C27 or C28)
activity	



	EU Technical mitigation criteria	Comments on alignment	Alignment
Mitigation criteria	<ul> <li>Substantial contribution to climate change mitigation</li> <li>Installation, maintenance and repair of renewable energy technologies, eligible if the activity consists in one of the following individual measures, if installed on-site as technical building systems:</li> <li>Solar photovoltaic systems and the ancillary technical equipment.</li> <li>Solar hot water panels and the ancillary technical equipment.</li> <li>Heat pumps contributing to the targets for renewable energy in heat and cool in accordance with Directive (EU) 2018/2001 and the ancillary technical equipment.</li> <li>Wind turbines and the ancillary technical equipment; EN 177 EN.</li> <li>Solar transpired collectors and the ancillary technical equipment.</li> <li>Thermal or electric energy storage units and the ancillary technical equipment.</li> <li>High efficiency micro CHP (combined heat and power) plant.</li> <li>Heat exchanger/recovery systems.</li> </ul>	Platzer installed solar panels on four of its sites.	Likely aligned as a solar photovoltaic system
	EU Taxonomy DNSH-criteria	Comments on alignment	Alignment
Climate change adaptation	• Please refer to Acquisition and ownership of buildings.	• See comments under Acquisition and ownership of buildings.	