

Civinity, AB Sustainability Report

For the year ended 31 December 2024

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INTRODUCTORY WORD

Dear Partners and Colleagues,

For the first time, Civinity has voluntarily prepared a 2024 sustainability report, partially based on the general principles of the European Sustainability Reporting Standards (ESRS) and partially on the thematic disclosures. During this process, we calculated the company's greenhouse gas emissions for the first time and conducted a comprehensive assessment of the operational impact.

The report allows us to more clearly identify areas where we can more effectively manage our impact on the environment and society. Civinity aims not only to meet regulatory requirements, but also to put more sustainable solutions into practice in our day-to-day operations.

This first sustainability report is an important step towards setting clear indicators and targets to guide our future progress and strategy.

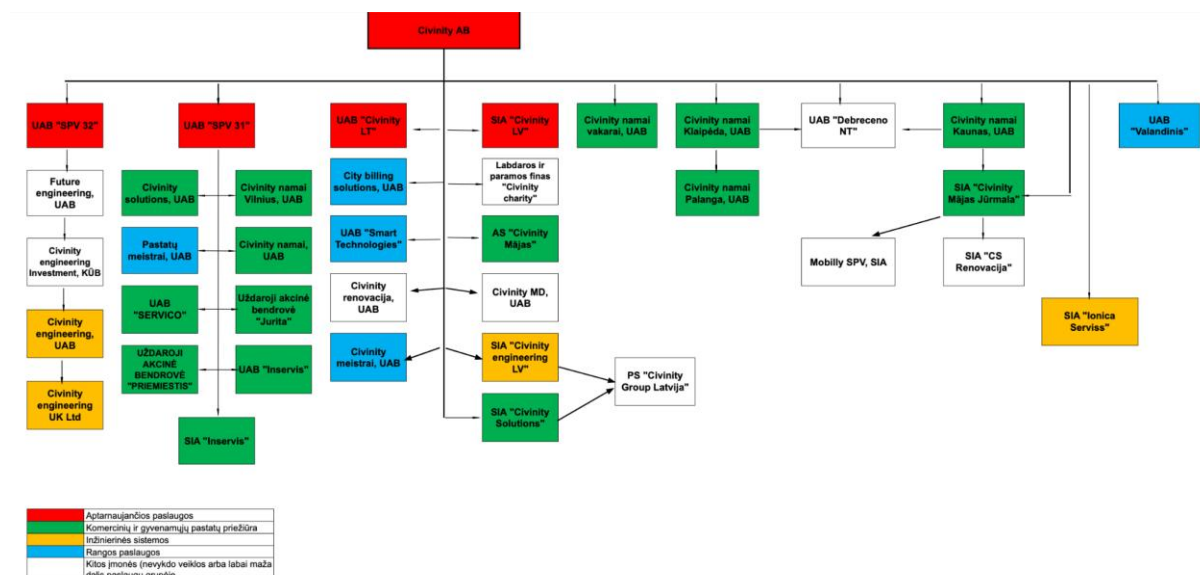
The sustainability disclosures are partly based on the European Sustainability Reporting Standards (ESRS), as laid down in the, and the Corporate Sustainability Reporting Directive (CSRD, Directive (EU) 2022/2464), which has been transposed into national legislation. The table below shows the structure of the report with references to the sustainability topics identified in the ETAS.

*Structure of the Sustainability
Report*

Parts of the report	ESRS code	Name
1. General information	2 ESRS	<u>General disclosures</u>
2. Environmental protection information	Not applicable	<u>Disclosure under Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)</u>
	E1 ESRS	<u>Climate change</u>
	E2 ESRS	<u>Pollution</u>
	E3 ESRS	<u>Water and marine resources</u>
	E4 ESRS	<u>Biodiversity and ecosystems</u>
	E5 ESRS	<u>Circular economy</u>
3. Social information	S1 ESRS	<u>Own workforce</u>
	S2 ESRS	<u>Value chain employees</u>
	S3 ESRS	<u>Affected communities</u>
	S4 ESRS	<u>Consumers and end-users</u>
4. Management information	G1 ESRS	<u>Business ethics</u>

1. GENERAL INFORMATION

AB "Civinity" (hereinafter referred to as - Civinity, company) is one of the largest building maintenance and engineering solutions groups in the Baltic States, combining the full range of services provided to its clients under three main brand names: "Civinity Namai", "Civinity Solutions" and "Civinity Engineering". The history of "Civinity Namai" began with the administration of apartment buildings in Lithuania in 1991.



1.1. Basis for the report

The Sustainability Report is prepared on a consolidated basis and covers all the company's activities for the financial year of 2024. The scope of consolidation of Civinity's Sustainability Report is in line with the scope of the financial statements, ensuring that the sustainability indicators cover all group companies in the same way as the financial statements.

The sustainability-related information covers both the upstream and downstream parts of Civinity's value chain, aiming to disclose significant impacts, risks, and opportunities related to the company's operations. The company has voluntarily prepared the 2024 sustainability report, partially based on the general principles of the European Sustainability Reporting Standards (ESRS) and partially on the thematic disclosures. In preparing the report, we strive to ensure the most comprehensive data collection possible from all participants in the value chain. We continuously strengthen our collaboration with suppliers and partners, promoting transparency and the exchange of sustainability-related data. As our suppliers' and partners' data management processes evolve, we aim to more accurately reflect their impact within our value chain.

Civinity has not exercised the option not to disclose intellectual property, know-how or innovation results and discloses all relevant information on future business developments and matters related to ongoing negotiations. This ensures transparent and comprehensive presentation

of sustainability information, allowing stakeholders to clearly understand the impact of the company's activities and sustainability strategy.

BP-1

1.1.1. Disclosure of information relating to special circumstances

As part of Civinity's first Sustainability Report under the ESRS standard for 2024, we have for the first time accounted for greenhouse gas (GHG) emissions. By counting emissions for the first time, we have identified key data gaps and opportunities to improve future data collection. In 2025, we plan to expand the scope of the calculation to include Scope 3 emissions across the entire value chain.

BP-2

1.2. Management

1.2.1. Role of administrative, management and supervisory bodies

According to the ESRS standard, the administrative, management and supervisory bodies (hereinafter - AMB) are the governing bodies of a company with the highest decision-making powers. Civinity's AMB comprises a Board of Directors consisting of five members, four of whom are independent, and a Chief Executive Officer. AMB has collected significant long-year experience in the building management and maintenance, engineering solutions and cleaning sectors, providing a deep understanding of the business, personnel management solutions, labour market dynamics and specific operational and geographic peculiarities in Lithuania and Latvia. The AMB is composed of 1 executive and 1 non-executive member. All employees are represented by the General director. AMB is composed of 3 men and 3 women, ensuring gender balance at decision-making level. The General director is responsible for overseeing the impacts, risks and opportunities (IRO) in the Civinity AMB.

1.2.2. Governance structure for sustainability issues

The governance structure for sustainability issues is summarised visually in the following sustainability performance model.

Civinity's sustainability governance structure

MANAGEMENT BOARD	
COMPOSITION	FUNCTIONS

Company owner Management board	Sets the strategic direction and objectives for sustainability. Gets Approval of the strategic direction and objectives. Receives reports on implementation.
GENERAL DIRECTOR	
COMPOSITION	FUNCTIONS
General director	<p>Approves the strategic direction and objectives for sustainability after receiving the Board's insights.</p> <p>Receives reports on implementation.</p> <p>Approves the actions needed to implement the sustainability direction and objectives.</p>
STRATEGIC PROJECTS WORKING GROUP	
COMPOSITION	FUNCTIONS
General director Finance director Legal director Director of Operations Marketing manager	<p>Discusses reports on the implementation in the sustainability area and targets, and the results of audits.</p> <p>Oversees the implementation of the sustainability direction and objectives.</p> <p>Initiates the necessary actions to comply with the direction, adjustments and objectives.</p> <p>Takes decisions on the actions needed to achieve the sustainability direction and objectives.</p>
SUSTAINABILITY STRATEGY PROJECT MANAGER	
COMPOSITION	FUNCTIONS
Legal director	<p>Analyses and proposes strategic direction and objectives for sustainability and ways of implementation.</p> <p>Sets out the sustainability indicators to be pursued.</p> <p>Ensures monitoring of the implementation of the chosen strategy</p>
MANAGEMENT MEETING	
COMPOSITION	FUNCTIONS

C-level (functional) managers Business managers	Implements the sustainability orientation and objectives through the identified measures.
	Declares a sustainable direction for customers, partners.
	Informs about implementation challenges, successes.
	Provides feedback on the adoption of the sustainability direction, implementation options to the management meeting.
	Provides suggestions on the direction and implementation of sustainability objectives.
ADMINISTRATION STAFF	
COMPOSITION	FUNCTIONS
Administration staff	Provide input to the Sustainability Strategy Project manager on the implementation of the sustainability direction and objectives.
	Follow procedures and policies on sustainability.

Management plays a key role in monitoring, managing and overseeing impacts, risks and opportunities (IROs) through a well-defined sustainability governance structure and division of responsibilities. Civinity's sustainability management is integrated into the organisation's strategic decisions, with decision-making shared between the Board, the General director, the Strategic projects working group, the Sustainability Strategy Project manager and the Management meeting.

Oversight of the IRO is the responsibility of the General director, who approves the sustainability direction and decides on the actions needed to implement it. The Legal director is appointed as the project manager for the Sustainability Strategy, providing analysis, proposing strategic direction and objectives, setting targets and monitoring implementation. The Strategic projects working group, which also includes the Legal director, regularly discusses progress, the results of audits, initiates corrective actions and decides on measures to implement sustainability.

The Management meeting puts sustainability actions into practice, provides feedback and suggestions, and administrative staff contribute by following the established procedures and

making suggestions for improvement. This multi-layered structure ensures that sustainability management processes are implemented efficiently, transparently and consistently.

Developing sustainability competences is also the responsibility of the Legal director. He identifies learning needs, participates in sustainability conferences and community events to follow current trends and initiate their integration into the organisation's practices. External expertise and training is also provided as needed to ensure that relevant knowledge is available to all staff working on sustainability.

The formulation, approval and oversight of the implementation of the Business ethics policy is the responsibility of the Board. It reviews ethical breaches, decides on actions, ensures staff awareness, training and the availability of reporting channels. The Board uses external consultants and participates in international training to update its expertise.

GOV-1

1.2.3. Information provided to and sustainability issues addressed by the company's administrative, management and supervisory bodies

The AMB are informed about sustainability issues through strategic project reports, management meetings and quarterly and annual staff meetings. Sustainability topics are included in the planning and reporting of strategic projects, ensuring that members of the AMB are well informed and able to exercise their oversight functions effectively. The AMB informs the Legal director responsible for the implementation of the sustainability project of material impacts, risks and opportunities.

GOV-2

1.2.4. Integrating sustainability-related performance into incentive schemes

Currently, there is no incentive scheme for AMB members related to sustainability issues. Future work is planned to analyse possible forms of incentive schemes and their contribution to the company's sustainability objectives.

GOV-3

1.2.5. Declaration of due diligence

The due diligence process at Civity is a tool to help assess and manage the impact of activities on the environment and people. It involves identifying, preventing, mitigating and taking responsibility for the impact of the company's activities. This process applies to both internal operations and the value chain, from suppliers to service delivery and business relationship management.

The due diligence process affects a company's strategy, operations, business relationships, operations and recruitment in international markets. We follow international best practices and are guided by the United Nations Guiding Principles on Business and Human Rights and the Organisation for Economic Co-operation and Development's (OECD) Guidelines for Multinational Enterprises. Although the process is not yet fully implemented in line with these standards, we foresee a strengthening of their application in the future, increasing transparency and responsible business practices throughout the value chain.

Civity's due diligence process includes the following key elements:

The main elements of a thorough check	Parts of the sustainability report
a) Integrating due diligence into governance, strategy and business model	GOV-2 , GOV-3 , SBM-3
b) Involvement of affected stakeholders in all key stages of due diligence	GOV-2 , SBM-2 , IRO-1 , MDR-P , S1 , S2 , S3 , S4 , G1
c) Identification and assessment of negative impacts	IRO-1 , SBM-3
d) Taking action to address such negative impact	E1 , E5 , S1 , S2 , S3 , S4 , G1
e) Monitoring and communicating the effectiveness of such efforts	E1 , E5 , S1 , S2 , S3 , S4 , G1

GOV-4

1.2.6. Sustainability reporting risk management and internal control

Civity is currently in the process of developing a sustainability reporting risk management framework to ensure data accuracy, reliability and transparency. The main challenges we face in disclosing sustainability information:

- The challenge of information dissemination - data on sustainability performance is scattered across different systems, documents and departments, making it difficult to

collect and consolidate. We are strengthening data centralisation and unified access to information for more efficient management.

- Data collection and reporting - most indicators need to be adapted to sustainability reporting standards and methodologies, so we are developing systems to collect, verify and report data quickly.
- Documenting and storing processes - the dependence of information on individual staff members poses a continuity risk. We aim to introduce systematic documentation of processes and ensure knowledge transfer and retention.

GOV-5

1.3. Strategy

1.3.1. Business model

Our company offers comprehensive building maintenance and engineering solutions. The Group brings together more than 20 companies operating in four areas:

- Residential building management - daily maintenance, servicing, cleaning, heating system maintenance, renovations, 24/7 support, self-service mobile app.
- Maintenance of commercial buildings - grounds and facilities management, technical servicing, safety and energy systems maintenance.
- Engineering solutions - design, installation and maintenance of intelligent engineering systems: heating, ventilation, cooling, electricity, water, fire protection and BMS systems.
- Digital solutions - building management systems (BMS), data analytics, mobile apps for residential and business customers.

The company's goal is to ensure the long-term functionality, comfort and value of buildings through innovation and responsible practices.

Markets served

Civinity provides services in two main geographic markets - Lithuania and Latvia. The company has a strong presence in major city centres, ensuring wide coverage and rapid service delivery.

In Lithuania, Civinity operates under the "Civinity Namai", "Civinity engineering", "Civinity solutions" and "Inservis" trademarks (brands) and provides a full range of building management and maintenance services for residential and other buildings. The main activities include maintenance, repair work, technical maintenance of heating systems and other building engineering systems, design and installation of engineering systems, grounds management, cleaning services and customer self-service. The headquarters are located in Vilnius, Kaunas, Klaipėda and Palanga.

In Latvia, Civinity operates under the "Civinity Mājas" brand and provides services not only for the management and maintenance of residential buildings, but also for commercial and public buildings. Headquarters are located in Riga and Jurmala.

In these markets, Civinity has consistently expanded its range of services to ensure the long-term performance of buildings, comfort of its occupants and customer satisfaction.

No new markets or client groups were added or removed during the reporting period and our services remained available to all interested parties. The number of employees by geographical location is presented in section 3.1.1 ["Company's workforce and its diversity"](#).

SBM-1

1.3.2. Strategy and sustainability objectives

Sustainability is part of Civinity's strategy to create long-term value for customers, employees, partners and the society. We are committed to responsible growth, efficient use of resources, innovative solutions and employee well-being. Our strategy is based on improving service quality, digitising operations, developing sustainable energy solutions and a transparent management culture.

The sustainability directions cover three main areas - environment, social responsibility and governance (ESG). In each area, we have set specific targets and initiatives to reduce our environmental impact, enhance employee experience and ensure responsible management by the year 2025.

In the environmental field, we aim to contribute to climate change mitigation and better resource use efficiency, focusing on energy use efficiency, transport solutions and the integration of green solutions. Initiatives are being implemented to use renewable energy, reduce emissions and modernise equipment.

The ambition of the social sector - is to create a safe, inclusive and supportive working environment. The company invests in employees' emotional and physical well-being, professional development and ensuring equal opportunities. Employee engagement, learning and community spirit are promoted - both in the internal culture and in relations with customers.

In terms of governance, we are guided by the principles of transparent, accountable and efficient management. Anti-corruption, conduct and supply chain ethics policies are installed, ensuring data security, customer trust and quality compliance management. The aim is to digitise business processes and enhance customer experience and engagement.

SBM-1

1.3.3. Value chain

Our value chain ¹covers all key stages of building administration, engineering and digital services - from identifying customer needs and designing solutions to implementation of services and long-term maintenance. Input elements include internal and external human resources, contractors, suppliers, digital solutions and customer engagement. Value creation is based on high quality services, efficient process management, building staff competences and implementing innovative solutions. In the future, we plan to develop a comprehensive value chain visualization that will reflect the value chain of all Civinity Group companies, highlighting key impacts for both internal and external stakeholders.

Civinity value chain

Starting link	Business operations	Final link
Includes analysing customer needs, developing service models, order taking, sales activities and partnerships with suppliers and contractors. This is the stage where the content of the services is shaped and the methods of operation are chosen to ensure the smooth running of the services.	Core value is created through the provision of services - building administration, maintenance, repair, cleaning, energy and engineering systems management and customer service. At the heart of it all are process efficiency, quality standards, staff development and continuous improvement. Digital tools (e.g. "Mano Civinity" (My Civinity)) ensure transparency and communication with customers.	The ultimate value is delivered to customers through high quality of service, long term performance of buildings, responsiveness to needs and provision of transparent information. Value is also returned to internal audiences, providing job growth opportunities for employees, stable relationships for partners and financial and reputational security for investors.

Characteristics of the value chain and Civinity's position in it

Civinity acts as an intermediary between residents, businesses and the public sector, integrating building maintenance, engineering and digital services. The company brings together the interests of its various partners, customers and employees, coordinating their activities to create shared value. Civinity operates in several markets - Lithuania and Latvia - adapting to local legal requirements and the specifics of building infrastructure. This position in the value chain

¹ The value chain refers to all the activities, resources and relationships of a company that relate to its business model and the external environment in which it operates.

allows Civinity to ensure a smooth, sustainable and tailored service flow from order to long-term maintenance.

SBM-1

1.3.4. Stakeholder involvement

We assess stakeholder perspectives to identify, assess and manage impacts, risks and opportunities. By involving stakeholders, we aim to ensure that our decisions are sound, our operations transparent and that we integrate the principles of sustainability into our operations. Our main stakeholders are:

Stakeholders and method of involvement

Stakeholders	Methods of involvement
Shareholders and investors	Board meetings, strategy sessions
Employees	Teams, Facebook closed group, face-to-face meetings, annual and monthly surveys (NPS), company events, Civinity Academy (training), internal documents, procedures, review and evaluation of indicators
Customers (B2B, B2C, B2G)	Customer service and customer support, customer surveys, educational articles on the company website, media and social networks, self-service platform, conferences
Management	Weekly and monthly meetings, KPI review and evaluation meetings, all-manager meetings, company events.
Suppliers	Individual meetings, communication through various channels (email, telephone, live meetings, etc.), various events and conferences
Regulators (NASDAQ) and public authorities	Company website, financial and operational reporting, reporting of material events on NASDAQ
Non-governmental organisations (NGO's)	Socially responsible partnerships, events, social media, conferences
Business partners	Individual meetings, communication through various channels (email, telephone, live meetings, etc.), various events and conferences

Stakeholder involvement was carried out in several ways to ensure the broadest possible approach and validity of the data. One of the most important sources of information was a survey conducted in 2022 among representatives of Lithuanian and Latvian companies. A total of 701 stakeholder responses were received, covering B2C and B2B customers, employees, shareholders, investors, business partners, NGOs and other relevant external representatives.


In addition, data available from periodic customer surveys, employee satisfaction surveys (including NPS indicators) and other regularly collected insights were used. There was also an active work group made up of legal, marketing, operations and finance specialists representing different functions of the company. The work group provided strategic and practical insights and participated in two workshops to assess and agree on the impacts, risks and opportunities identified. External consultants provided methodological and strategic support throughout the process. This multi-faceted engagement model ensured that the assessment of materiality was not only structured, but also based on stakeholder expectations and relevant insights.

SBM-2

1.4. Impact, risk and opportunity assessment process

In 2024, we conducted a dual materiality assessment in accordance with the European Sustainability Reporting Standards (ESRS) guidelines, the Corporate Sustainability Reporting Directive (CSRD Directive (EU) 2022/2464), EFRAG guidelines on dual materiality assessment and value chain analysis, and the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). In addition, reference was made to the Sustainability Accounting Standard Board (SASB). The dual materiality assessment was performed taking in the account the activities of all Civity group companies. This assessment was an essential part of Civity's sustainability strategy, helping to identify the key social, environmental and governance issues that have a material impact on our operations, stakeholders and the environment. The assessment process was coordinated by external sustainability consultants.

Impact identification and assessment

 **Material impact**- a sustainability issue is considered material in terms of impacts when it involves a material actual or potential positive or negative impact on people or the environment in the short, medium and long term. For the purposes of impact assessment, a material sustainability issue includes impacts related to the company's operations and the initial and final stages of the value chain, including its products and services, as well as its business relationships.

We started with a detailed industry analysis to set the broader context of the company's current and potential impact², taking into account industry trends and practices of other companies. This was followed by a comprehensive review of internal documents, including the Sustainability strategy paper (2022), the results of the stakeholder engagement, the company's structure and value chains. This included the management and maintenance of residential and

² ESRS 2, IRO-1, 53 b.

other buildings, engineering systems, maintenance services and contracting services. This data³ was used to map the company's value chain against the ESRS list⁴ of sustainability issues.

To refine the information, we held weekly working sessions with the heads of legal and marketing departments, where topics outside the scope of corporate influence were dropped, resulting in a shorter, more focused list. Particular attention was paid to climate change and social issues in the company's operations and value chain, as well as to the well-being of the company's employees and related business ethics issues. To further enhance the accuracy of this process, we have used a previously conducted stakeholder survey to confirm the importance of these impacts and gather additional views, focusing on activities and business relationships that increase the likelihood of negative impacts.

In the dual materiality case, we assessed the potential and actual impacts of the company on people and the environment against the criteria set out in the ESRS:

1. **Magnitude of impact (S)**: How strong the negative impact is or how much the positive impact benefits people or the environment;
2. **Impact coverage (Sc)**: how widespread a negative or positive impact is. In the case of environmental impacts, coverage can be understood as the extent of environmental damage or the geographical extent of the damage. In the case of human exposure, coverage can be understood as the number of people adversely affected;
3. **Irreversible nature of the impact (I)**: Whether and to what extent the negative impact can be remedied, i.e. restored to the original state of the environment or the people affected;⁵
4. **Likelihood (L)**: The likelihood and nature of the impact, ranging from actual to possible.⁶
5. **Period (T)**: short, medium or long-term.⁷

The formula has been designed to combine all the individual scores for the various criteria into a single scoring system that gives a clear and consistent indication of the overall severity of impacts. By integrating different dimensions - impact magnitude, impact coverage, irreversibility, likelihood and period - this assessment framework ensures that the various factors that determine impacts are unified into a single standardised indicator. This approach allows for a more holistic understanding of the overall impact, while maintaining the comparability and objectivity of different impacts and criteria.

Formula				
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³ ESRS 2, IRO-1, 53 g.

⁴ ESRS 1, Annex A, AR16.

⁵ ESRS 1, Annex A, AR10 c.


⁶ ESRS 2, BP-2, 9.

⁷ ESRS 2, BP-2, 9.

Impact strength =	(S x Sc x I)	+	(L x T)	
	3		2	

The weight structure in the formula reflects the relative importance of the different criteria. By averagely assessing the first three criteria (magnitude, coverage and reversibility), and considering probability and time period separately, the formula balances the importance of short-term and long-term considerations, while taking into account probability and the potential magnitude of the impact. In addition, in cases of positive feedback, the score is set at 0, thus ensuring that the negative impact is weighted more heavily in the overall assessment and in the average score.⁸

Identifying and assessing risks and opportunities

 **Financial materiality** - a sustainability issue is considered financially material if it presents risks or opportunities that have an impact (or could reasonably be expected to have an impact) on the company's financial position, financial performance, cash flows, ability to secure financing or cost of capital in the short, medium or long term.

Based on industry insights and supporting documents, we have identified potential risks and opportunities associated with the identified impacts. A detailed analysis of climate-related risk scenarios was not carried out at this stage.

The dual materiality assessment assessed emerging risks and opportunities with actual or potential financial impact, as well as potential and actual impacts, using criteria defined by ESRS, which are different from the criteria used for impact assessment:

1. **Magnitude of potential financial impact (M)**: the extent or magnitude of the potential or actual financial impact on the company;⁹
2. **Likelihood (L)**: The likelihood and nature of the impact, ranging from actual to possible.
3. **Period (T)**: short, medium or long-term.

The logic of the financial impact assessment follows a similar structure to that, presented in the impact assessment section. However, instead of looking at magnitude, coverage and irreversibility, the focus is on the magnitude, likelihood and period of the financial impact.

Formula				
Financial impact =	M	+	(L x T)	

⁸ ESRS 2, IRO-1, 53 b iv.

⁹ ESRS 1, 3.5 Financial materiality, 49.

			2	
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Financial materiality was assessed using quantitative and qualitative indicators based on the financial impact on profitability, financial position and cash flow.

Determination of materiality thresholds

The threshold for material impact and financial materiality was set at 6 out of 10 for the identification of material sustainability issues to be reported.¹⁰

Materiality	Score
High	8-10
Average	5-7
Low	≤ 4

Frequency of materiality assessment

The assessment of materiality will be carried out every two years at the company, unless there are significant changes within that period that could affect the identification of material impacts, risks or opportunities. Each year, as part of the preparation of the Sustainability report, a review of the evaluation will be carried out to ensure that the results of the previous evaluation are still relevant. If it is found that there have been no significant changes in the company's operations, structure or external environment, the conclusions of the previous assessment will be used.

IRO-1

1.1. Impact, risk and opportunity assessment results

After a dual materiality assessment, we have purified the key topics that are relevant to Civinity's performance under the ESRS requirements. In the environmental field, the most relevant topic is E1 Climate change, in the social field S1 Own workforce and S4 Consumers and end-users, and in the governance field G1 Business ethics. These topics reflect the impact, risks and opportunities of our activities, both internally and externally.

In assessing impacts, risks and opportunities, we have considered temporary and administrative staff separately, as their nature of work, conditions and associated risks differ significantly. Temporary employees are directly employed by client organisations, so their working environment, social security and safety issues depend on the specific sector and employer policy.

¹⁰ ESRS 2, IRO-1, 53 b iv.

These employees are usually exposed to different working conditions depending on the sector in which they work, so their social and occupational safety aspects were assessed separately.

Administrative staff work within the company, so their most important topics relate to working conditions, career development opportunities and organisational management principles. As their working environment is stable and regulated by internal processes, their evaluation was focused on governance and social responsibility.

Environmental impacts, risks and opportunities

E1 CLIMATE CHANGE				
Subtopic: Climate change mitigation				
Material IRO	Material impacts, risks and opportunities	Estimated period	Part of the value chain	Description
GHG emissions	Negative effects/actual	Short period	All	Negative impacts on the environment and society due to greenhouse gas (GHG) emissions in the company's operations and throughout the value chain.
Energy use	Negative effects/actual	Short period	Key operations; Final chain	The negative effects are due to the high energy consumption for direct operations, which is determined by the size of the company, and the additional energy demand associated with the intermediation of the organisation of the energy supply to customers.
	Possibility	Short period	Final chain	Offer clients building renovation and other measures to improve energy efficiency and reduce energy costs.
	Possibility	Medium period	Key operations	The ability to buy certified renewable energy for both direct operations and customers, thus reducing environmental impact, contributing to sustainability goals and ensuring comfortable working and service conditions.

Social impacts, risks and opportunities

S1 OWN LABOR FORCE

Subtopic. Working conditions

ESRS code	Material impacts, risks and opportunities	Estimated period	Part of the value chain	Description
Guaranteed employment	Risk	Short period	Key operations	Risk of staff shortage: the limited number of specialists with specific knowledge and certifications in the market makes it difficult to attract and retain them.
Decent wages (additional benefits)	Positive effect/actual	Short period	Key operations	The company's employees are satisfied and motivated. They are provided with additional benefits – partner discounts, additional days off on certain occasions, and a hybrid work model that creates more flexible working conditions.
	Risk	Short period	Key operations	Employee dissatisfaction with pay and rising expectations for compensation can lead to employee turnover and increase operating costs.
Social dialogue	Positive effect/actual	Short period	Key operations	Positive impact: fosters cooperation between management and employees, strengthens organizational culture and mutual trust.
Health and safety	Negative effect/actual	Short period	Key operations	Given the nature of Civinity activities, working with building maintenance, installation and repair of engineering systems inevitably involves an increased risk environment. Such activities may lead to the risk of work-related accidents and health disorders, therefore having a direct negative impact on health and safety.
	Risk	Short period	Key operations	The main risk is non-compliance with health and safety requirements, which can lead to accidents, including fatalities, and have a negative impact on employee safety and the company's reputation.

Subtopic. Equal treatment and equal opportunities for everyone

Gender equality and equal pay for work of equal value	Positive effect/actual	Short period	Key operations	Positive impact: ensuring equal treatment and equal opportunities for all – adhering to the principles of gender equality and applying equal pay for work of equal value, regardless of gender.
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S1 OWN LABOR FORCE

Subtopic. Working conditions

ESRS code	Material impacts, risks and opportunities	Estimated period	Part of the value chain	Description
Measures to combat violence and harassment in the workplace	Positive effect/actual	Short period	Key operations	Positive impact: An implemented policy to combat violence and harassment in the workplace and a clear reporting channel (email) ensure a sense of safety for employees and encourage them to openly report potential violations.
Diversity	Positive effect/actual	Short period	Key operations	Positive impact: The company promotes diversity and non-discrimination based on age, gender or beliefs. Standard provisions and internal procedures are used to implement this policy, ensuring that there are no barriers that could limit or reduce diversity.

S2 VALUE CHAIN EMPLOYEES

Subtopic: Value chain employees

ESRS code	Material impacts, risks and opportunities	Estimated period	Part of the value chain	Description
Health and safety	Negative effect	Short period	Starting chain	Throughout the Civity Group value chain – from service provision to engineering solutions and building maintenance – employees of suppliers, contractors and other partners are exposed to health and safety risks. These risks can lead to workplace accidents, which have a negative impact on the well-being and health of employees.
	Risk	Short period	Starting chain	Potential health risks to value chain workers due to non-compliance with safety requirements by contractors or service providers - possible delays, reputational damage, customer dissatisfaction.

S4 CONSUMERS AND END-USERS

Subtopic: Personal safety of users and/or end-users

ESRS code	Material impacts, risks and opportunities	Estimated period	Part of the value chain	Description
Personal security	Positive effect/actual	Short period	Final link	Positive impacts: personal safety of users and end-users is ensured through lighting of staircases and areas, installation of CCTV cameras, slip-resistant staircases and safe areas during the cold season, pest control, disinfection, hydraulic testing, maintenance and testing of equipment (e.g. lifts) and ongoing maintenance of buildings.

S4 CONSUMERS AND END-USERS

Subtopic: Personal safety of users and/or end-users

ESRS code	Material impacts, risks and opportunities	Estimated period	Part of the value chain	Description
				Constantly maintains buildings
	Possibility	Short period	Final chain	Offer customers additional security measures, such as CCTV cameras, to ensure greater personal safety and improve security levels.

Management impacts, risks and opportunities

G1 Business ethics				
Subtopic: Company culture				
Material IRO	Material impacts, risks and opportunities	Estimated period	Part of the value chain	Description
Company culture	Positive effect/actual	Short period	Key operations	Positive impact: the company has a unifying organisational culture that motivates and promotes their engagement
Subtopic: Supplier relationship management, including payment practices				
Supplier relationship management, including payment practices	Positive effect/actual	Short period	Starting link	Positive impact: the company maintains strong and long-lasting relationships with its suppliers, ensuring continuity and stability in cooperation. Payment practices are transparent and timely, which helps to build trust with suppliers and ensure successful future cooperation.
Subtopic: Cyber security				
Cyber security	Risk	Short period	Key operations	The risk of hacking , which can lead to data loss, reputational damage and potential business disruption, which can have a negative impact on business performance and trust.
Subtopic: Company culture				
Prevention and detection, including training	Risk			Limited employee awareness of preventive measures may mean that not all employees are aware of the possibility to report incidents, which may reduce the effectiveness of detection and risk unfair behaviour within the organisation.

Other ESRS topics such as E2 Pollution, E3 Water and marine resources, E4 Biodiversity and ecosystems, E5 Resource use and the circular economy, as well as in the social field, the topic related to S3 Affected communities, were not recognised as relevant for Civinity's activities. The impact of these topics on our organisation is minimal, as our activities are not directly linked to production processes, sources of pollution or the use of natural resources.

IRO-1	SBM-3
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Civinity's Sustainability report includes the ESRS 2 IRO-2 disclosure requirements, which cover the data units of the horizontal and thematic standards and are in line with the requirements of other EU legislation, such as the Sustainable Finance Disclosure Regulation (SFDR) and the EU Climate Law. The material disclosures have been identified through a process of impact, risk and opportunity assessment and details are provided in [Annex 1](#) to this report.

IRO-2

1.2. Company policies

We do not currently have a formal sustainability policy, but we plan to have one in place in the second quarter of 2025, setting out our key sustainability principles and provisions. Below are the policies relevant to Civinity, the implementation of which is ensured by the Director of the company. The following sections will provide detailed descriptions of each policy, taking into account the significant aspects of IRO.

Key Civinity policies

Policy	Approved	Coverage	Familiarisation with the policy	ASV topics related to the Policy
Statement of social responsibility	2022 meter	The company's approach and activities include the promotion of volunteering, engaging in social activities, and encouraging employees to participate in social and community activities.	The main policy provisions are included in contracts with the interested party or declared to the party when it comes into contact with the country. Employees always have access to the policy from their first day of work with the company.	Equal treatment and equal opportunities for all, Company culture
Rules of Procedure	2023	The document sets out the main provisions relating to the organisation of the work process in the company and the rights and obligations of employees.	Each employee shall be informed of the Rules of Procedure with a signed confirmation of familiarization at the start of his employment. Employees have access to the rules from their first day of work with the company.	Working conditions

Code of ethics	2019	The document sets out the standards of conduct to which employees are expected to adhere. The document summarises the company's values and business principles.	Each employee shall be informed of the Rules of Procedure with a signed confirmation of familiarization at the start of his employment. Employees have access to the rules from their first day of work with the company.	Company culture
Procedures for monitoring and control of information and communication technologies and employees in the workplace	2019	The document establishes the procedures for the use of information and communication technologies in the company and defines the scope and conditions for monitoring and controlling employees in the workplace.	Each employee shall be informed of the Rules of Procedure with a signed confirmation of familiarization at the start of his employment. Employees have access to the rules from their first day of work with the company.	Other rights, Cyber security
Equal opportunities policy and implementation order	2019	The purpose of the policy - is to ensure equal treatment of all employees of the company and persons applying for employment, both before and after the conclusion of the employment contract, regardless of gender, race, nationality, language, origin, social status, religion, beliefs or opinions, age, sexual orientation, disability, ethnicity and/or religion.	Each employee shall be informed of the Rules of Procedure with a signed confirmation of familiarization at the start of his employment. Employees have access to the rules from their first day of work with the company.	Equal treatment and equal opportunities for all, Company culture
Order for the submission and handling of requests from staff members relating to family responsibilities	2019	This order establishes the rules and procedures under which employees may submit requests to their employer relating to the reconciliation of family responsibilities and work duties, and sets out the basic principles and guidelines for the employer's handling of these requests.	Each employee shall be informed of the Rules of Procedure with a signed confirmation of familiarization at the start of his employment. Employees have access to the rules from their first day of work with the company.	Other rights

Violence and harassment prevention policy	2022 meter	The policy sets out effective and efficient measures to protect employees from violence and harassment. The policy also helps employees to have a clear understanding of the possible manifestations of violence and harassment at work, to recognise the signs and to know the legal remedies.	Each employee shall be informed of the Rules of Procedure with a signed confirmation of familiarization at the start of his employment. Employees have access to the rules from their first day of work with the company.	Other rights, Company culture
Procedures for handling complaints received and responding to customers	2021	Establishes the process by which complaints received from customers are dealt with, and the response to the customer is prepared and delivered.	Employees who interact with the company's customers, deal with customer complaints and prepare responses to them are familiarized with the procedure.	Other rights, Information-related impacts on consumers/end users
Remote work procedure	2023	The procedure lays down the rules for the organisation of teleworking by the company's employees	Each employee shall be informed of the Rules of Procedure with a signed confirmation of familiarization at the start of his employment. Employees have access to the rules from their first day of work with the company.	Working conditions
Customer service standard	2021	Sets out the basic principles, policies and procedures for how the company's employees interact with customers	Each employee shall be informed of the Rules of Procedure with a signed confirmation of familiarization at the start of his employment. Employees have access to the rules from their first day of work with the company.	Information-related impacts on consumers/end-users, Company culture

Zero tolerance policy for unfair treatment	2024	The policy sets out the principles that are binding on all employees and which are used to ensure the transparency of the Company's operations and to prevent any dishonest behaviour. The policy also covers the prevention of corruption and the avoidance of conflicts of interest. The policy sets out the procedures for individuals to report unfair treatment, how such requests are dealt with, and how the anonymity and protection of the whistleblower is ensured.	Each employee shall be informed of the Rules of Procedure with a signed confirmation of familiarization at the start of his employment. Employees have access to the rules from their first day of work with the company.	Corruption and bribery, Company culture
Personal data processing policy. Rules on the processing of personal data. Policy on the retention of employees' personal data.	2018	Lays down the principles and rules for the processing of personal data, the rules for exercising and enforcing the rights of data subjects, and the procedure for handling complaints.	Each employee shall be informed of the Rules of Procedure with a signed confirmation of familiarization at the start of his employment. Employees have access to the rules from their first day of work with the company.	Other rights
Debts management and recovery procedures	2018	Establishes rules and procedures for dealing with debts owed by customers, suppliers and contractors, for organising the debt recovery process and for preventing arrears	Each employee shall be informed of the Rules of Procedure with a signed confirmation of familiarization at the start of his employment. Employees have access to the rules from their first day of work with the company.	"Supplier relationship management, including payment practices"

S1-1	E1-2	MDR-P
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2. ENVIRONMENTAL PROTECTION INFORMATION

Environmental issues are an important part of our business and we strive to consistently reduce our climate impact and integrate sustainability principles into our daily operations. Based on the ESRS requirements and the results of our dual materiality assessment, we have identified E1 Climate change as one of the key areas for action. Climate change mitigation and energy consumption are key sustainability issues.

Disclosure under Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)

This year, we have not yet reported under Article 8 of Regulation (EU) 2020/852 (the Taxonomy Regulation) as we have prioritised other sustainability disclosure requirements. From next year, we plan to start providing information on the taxonomic compliance of activities in accordance with the legislation.

2.1. A transformation plan to mitigate climate change

To reduce the climate impact of our operations, we plan to integrate sustainability solutions into our business processes. One of our key objectives is to reduce GHG emissions and optimise energy use in offices and other operational areas. We plan to include additional sustainability criteria in the selection processes for service providers to ensure that our partners respect environmental principles.

We have not yet developed a comprehensive transformation plan, but we are assessing the various options and selecting the most appropriate solutions to effectively reduce our climate impact. We expect a comprehensive transformation plan to be developed and delivered in the next 2-3 years.

E1-1

2.2. Greenhouse effect causing gases

To responsibly manage our environmental impact, we develop a Sustainability policy and follow sustainability principles that help integrate environmental considerations into our day-to-day operations. The development of a GHG Emissions reduction plan for 2026-2027 will lead to the formulation and implementation of policies related to climate change mitigation and adaptation. For more information on our policy guidelines, see section [1.5 "Company policies"](#).

2.2.1. Impact, risks and opportunities

The dual materiality assessment found that Civinity's activities have a significant impact on the climate through greenhouse gas (GHG) emissions from both its direct operations and its activities along the value chain. It also identifies the high energy consumption associated with the

scale of the company and the intermediation of the organisation of energy supply to customers, which leads to additional environmental impacts.

The assessment also highlighted opportunities related to climate change, as green energy procurement can significantly reduce negative environmental impacts, contribute to sustainable performance targets and improve energy efficiency in buildings.

E1-1	SBM-3
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2.2.2. Actions and objectives

Company actions, targets and indicators

Actions	Tasks	Indicators
Develop and implement a green energy procurement plan	Start buying green energy	100% of the energy the company buys comes from renewable energy sources

E1-4

2.2.3. GHG emissions

In 2024, Civinity's total GHG emissions amounted to 2,098.92 tonnes of carbon dioxide equivalent emissions. The total Scope 1 GHG emissions amounted to 1979.39 tonnes of carbon dioxide emissions. The total Scope 2 GHG emissions amounted to 119.53 tonnes of carbon dioxide emissions. This year, the company has counted only direct and indirect emissions from its activities/operations, i.e. scope 1 and scope 2 emissions. In the future, Civinity plans to expand the scope of the calculation to include emissions from managed buildings and the entire supply chain (Scope 3), thus ensuring a more comprehensive assessment of its climate impact.

GHG emissions by sector

		Unit of measure	CO2e
Scope 1 GHG emissions			
Total Scope 1 GHG emissions		tCO2e	1979.39
1	Mobile devices	tCO2e	1979.387
2	Stationary devices	tCO2e	0
Percentage of Scope 1 emissions subject to a regulated ETS		%	0

Scope 2 GHG emissions		
Total Scope 2 GHG emissions	tCO ₂ e	
Total Scope 2 emissions determined by the local method	tCO ₂ e	119.535
Total market-based Scope 2 emissions	tCO ₂ e	236 319
Total GHG emissions		2098.92
Total GHG emissions (local method)	tCO ₂ e	2098.92
Total GHG emissions (market method)	tCO ₂ e	2215.71
Anthropogenic emissions	tCO ₂ e	1974.41
Biogenic emissions	tCO ₂ e	124.509

Base year

2024 is the first year we calculate our carbon footprint, so this data will serve as a baseline for future emissions calculation and reduction initiatives.

GHG emissions intensity by net revenue

In 2024, the Group's net revenue amounted to EUR 88,481,000 (Civinity financial statements, page 10). After analysing the environmental footprint, we have calculated that for every euro earned, 0.000025 tCO₂e is generated using the local and market approach. This indicator was determined by dividing Civinity's total GHG emissions for the reporting year by its annual net revenue to measure the climate impact of our activities.

GHG emission intensity by net revenue

GHG emissions intensity by net revenue	Unit of measure	2024
Total GHG emissions <u>(based on the location-based approach)</u> divided by net revenue	tCO ₂ e / €	0.000024
Total GHG emissions <u>(based on the market-based approach)</u> divided by net revenue	tCO ₂ e / €	0.000025

2.2.4. Energy consumption

Civinity had a net revenue of EUR 88,481,000 in 2024 (Civinity financial statements, page 10). During the same period, the company's energy consumption was 782.69 MWh. The energy intensity indicator shows how much energy is used to generate one euro of revenue. It is calculated by dividing annual energy consumption by annual net revenue. In this case, the 2024 intensity target is 0.00088 MWh/Eur.

Civinity energy consumption and mix of energy types

No.	Energy consumption and type mix	Unit of measure	2024
1	Fuel consumption of coal and its products	MWh	0.00
2	Consumption of crude oil and petroleum product fuels	MWh	0.00
3	Natural gas fuel consumption	MWh	56.51
4	Consumption of other fossil fuels	MWh	0.00
5	Consumption of electricity, heat, steam and cooling from fossil resources	MWh	726.18
6	Total fossil energy consumption	MWh	782.69
Share of fossil energy in total energy consumption		%	100.000%
7	Nuclear fuel consumption	MWh	0.00
Share of nuclear energy in total energy consumption		%	0.00%
8	Consumption of renewable fuels, including biomass (which also includes industrial and municipal waste of biological origin, biogas, hydrogen from renewable sources, etc.)	MWh	0.00
9	Consumption of electricity, heat, steam and cooling from renewable energy sources	MWh	0.00
10	Consumption of non-fuel renewable energy produced	MWh	0.00
11	Total renewable energy consumption	MWh	0.00
Share of renewable energy in total energy consumption		%	0.000%
Total energy consumption (sum of rows 6 and 11)		MWh	782.69

Energy intensity by net revenue		2024
Total energy consumed by activities in sectors with high climate impact divided by the net revenue generated by those activities		MWh / € 0.00088

		2024
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1	The amount of non-renewable energy produced by the company.	MWh	0
2	The amount of renewable energy produced by the company.	MWh	0

This is the first year that we have recorded energy consumption intensity figures, so we are not yet in a position to compare them with the previous reporting year. The next report will use 2024 as a baseline year, and the data collected will allow for a more accurate assessment of changes in energy consumption and efficiency.

E1-5

2.2.5. GHG reduction targets

As part of our commitment to consistently reducing our climate impact, we aim to set short-, medium- and long-term GHG emission reduction targets that cover all areas. At the moment, specific targets have not yet been defined, but we plan to set them and present them in the 2026 report.

Carbon self-appraisal

During the reporting period, we did not carry out any carbon absorption or storage activities and did not contribute to GHG reduction projects through carbon credits. We have also not yet developed a methodology to neutralise residual emissions.

Estimated financial impact of significant climate-related physical and transformational risks and potential opportunities

It is planned to disclose the assessment of the expected financial impact of significant physical and transformational risks and climate-related options in stages. This will be done following a comprehensive climate risk assessment and a transformation plan.

E1-4	E1-7	E1-8	E1-9
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2.2.6. GHG methodology

In this section, we provide detailed information on our GHG footprint, with a detailed overview of the categories, thresholds, assumptions and methodology used.

The information is based on good practice principles and is based on:

- The World Business Council for Sustainable Development(WBCSD) and the World Resources Institute. The *World Resource Institute's* 2004 Corporate Accounting and Reporting Standard (CRS). *GHG Protocol*;

- UK Department for Environment, Food and Rural Affairs (*hereinafter* - DEFRA) has adopted the year 2022 *Government Greenhouse Gas Conversion Factors for Company Reporting*;
- Intergovernmental Panel on Climate Change (*hereinafter* IPCC) 2006 "Guidelines for national greenhouse gas accounting".

Organisational boundaries

Civinity has established clear organisational boundaries, based on the GHG Protocol, to calculate and report on the GHG footprint. These boundaries are defined by the Operational boundaries (*hereinafter* - OB) approach, which ensures that GHG emissions from all operations over which a company has control are accounted for, regardless of whether it has a financial interest in them.

Limits of accountability

Scope 1: Direct GHG emissions

Civinity's direct GHG emissions in the first scope come from sources within our management and control. This includes:

- Mobile sources - fuel consumption generated by the use of cars owned by Civinity. These emissions accounted for 29.68% of total scope 1 emissions.

Scope 2: Indirect GHG emissions from purchased energy

Civinity's indirect GHG emissions under Scope 2 are due to the consumption of purchased electricity, heat and cooling energy used in our operations in our offices and administrative premises.

Our second area includes the following issues:

- **Electricity consumption in the office space** accounts for the majority of emissions in Scope 2. All our offices buy electricity under standard contracts, using both renewable and conventional electricity.
- **Premises heating and cooling** - all our office spaces are heated and cooled using energy supplied by external energy suppliers (district heating, electricity or external energy services).

GHG emission sources not included

This report does not calculate GHG emissions from Scope 3.

Qualitative uncertainty assessment

For the calculation of GHG emissions, we have used emission factors obtained from reliable sources such as DEFRA, AIB (. *Association of Issuing Bodies*), the UK's Department for Business, Energy and Industrial Strategy (BEIS) and the UK's Department for Business, Energy and Industrial

Strategy (DBEIS) the IPCC, the French Environment and Energy Management Agency, the United States Environmental Protection Agency, U.S. , their publications and reports. Emission factors available in the "Climatiq.io" database were also used. Where available, we use emission factors available for the Lithuanian region.

Quantification of GHG emissions

To determine the amount of GHG emissions, our activity data is multiplied by the corresponding GHG emission factor.

The carbon footprint, expressed in CO₂ equivalent (kg CO₂e), is obtained by multiplying the activity data by the verified GHG emission factor. The final GHG emissions for each group shall be reported in tonnes of CO₂ equivalent (t CO₂e.). The global warming potential (GWP) value is used to calculate CO₂e, it is based on the IPCC Fourth assessment report.

Formula for determining GHG emissions

GHG emissions = VD x EV	
GHG emissions amount	kg CO ₂ e
VD (performance data)	Expression of an enterprise's performance in units of the relevant measure
EV (emission factor)	kg CO ₂ e/unit of measurement

Once the emissions of GHGs (e.g. carbon dioxide, methane and nitrous oxide) have been determined, their CO₂ equivalent value is calculated by multiplying these emissions by the corresponding global warming potential, as indicated in the table below. These values are taken from the IPCC Fourth assessment report.

Global warming potential values for GHG

Gas	Global warming potential (GWP)
Carbon dioxide (CO ₂)	1
Methane (CH ₄)	25
Diazote monoxide (N ₂ O)	293
Hydrofluorocarbon (HFC)	1 300 – 1 924* ¹¹

¹¹ Depends on the gas.

GHG calculation principles

This report has been prepared in accordance with the GHG accounting and reporting framework:

- **materiality:** Civinity has systematically identified sources of GHG emissions related to its activities and stakeholders and reports on them in this report. This ensures that Civinity's GHG accounting is appropriate to the scale of the activity and addresses the key issues raised by stakeholders;
- **comprehensiveness:** the report covers all sources of GHG emissions within the activity boundaries defined by Civinity. If certain sources are not included, the report shall give clear and reasoned reasons for their exclusion.
- **consistency:** the chosen methodology and the use of appropriate data sources are consistently followed in order to allow reliable year-on-year comparisons and to enable stakeholders to monitor progress in Civinity. Any deviations from or changes to the methodology will be fully explained and justified;
- **transparency:** Civinity commits to provide detailed information on its GHG accounting methodologies, assumptions and data sources. This commitment ensures that stakeholders have a clear understanding of the company's reporting processes and are able to assess the integrity of the data provided;
- **Accuracy:** Civinity applies rigorous data collection processes, uses updated emission factors and uses accurate measurement methodologies. While it is difficult to achieve complete accuracy, the aim is always to minimise potential errors and uncertainties in the data.

E1-6

2.3. Circular economy

The circular economy factor in Civinity's activities was assessed as negligible, as our activities do not involve manufacturing processes, intensive use of raw materials or the generation of large amounts of waste. However, we encourage responsible use of resources and waste reduction in our office activities. We will review this factor in a future double materiality assessment and, if it becomes material, include it in the analysis.

E5

2.4. Pollution

The pollution factor in Civinity's activities has been assessed as negligible as our activities are not directly linked to production processes or the intensive use of pollution sources. We will review this factor in a future double materiality assessment and, if it becomes material, include it in the analysis.

E2

2.5. Water and marine resources

Civinity's water use is limited to basic office needs and the extent to which it is used by customers in the buildings it manages, so this factor was considered negligible in the dual materiality assessment. We plan to review this factor in a future double materiality reassessment and, if found to be material, include it in the sustainability analysis.

E3

2.6. Biodiversity

GHG emissions contribute to climate change and extreme weather events, which in the long term can have negative impacts on biodiversity and ecosystems - contributing to species loss, habitat degradation and natural resource imbalances. However, the dual materiality assessment did not identify any significant actual or potential negative or positive impacts of Civinity on biodiversity. We plan to review this factor in a future double materiality reassessment and, if found to be material, include it in the sustainability analysis.

E4

3. SOCIAL INFORMATION

The foundation of our activities - is respect for people and a commitment to creating a responsible, collaborative environment. We understand that every employee contributes to the success of the company, so we strive to build trusting relationships, a clear culture of responsibility and mutual understanding.

Guided by the values of "People" and "One team", we see the team as a whole, where everyone's contribution matters. We want employees to feel heard, engaged and empowered to grow with the organisation.

For us, social responsibility is not only about respectful relationships, but also about working to create a sustainable, people-friendly working environment. We want everyone to be able to see their work as meaningful and contributing to a responsible future.

3.1. Own workforce

3.1.1. The company's employees and their diversity

As at 31 December 2024, the number of employees at the company was 1642 persons. Below is a breakdown of the number of employees across the different cuts.

SBM-1	S1-6
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Breakdown of employees by form of employment and gender

2024.12.31	2024				
	WOMEN	% <i>part of everyone</i>	MEN	% <i>part of everyone</i>	TOTAL:
Employed staff (all)	866	52.74%	776	47.26%	1642
Permanent staff	862	52.74%	769	47.26%	1631
Temporary staff	0	0.00%	0	0.00%	0
Non-guaranteed load workers	0	0.00%	0	0.00%	0
Top management	4	0.00%	7	0.00%	11

Non-employed staff (all)	0	0.00%	0	0.00%	0
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Distribution of employees by age and category

	Women						
	up to 30 year		30-50 years		over 50 year		
	The number of employees	% part of everyone	The number of employees	% part of everyone	The number of employees	% part of everyone	TOTAL :
Members of the management body (Board)	1	9.1%	1	9.1%	2	18.2%	4
Senior managers	0	0.0%	6	26.1%	1	4.3%	7
Middle managers	0	0.0%	9	33.3%	2	7.4%	11
Administration	11	2.4%	220	47.2%	18	3.9%	249
Drivers	0	0.0%	0	0.0%	0	0.0%	0
Qualified workers	0	0.0%	4	4.1%	3	3.1%	7
Unqualified workers	13	1.3%	250	25.7%	304	31.3%	567
Foreigners (citizenship)	0	0.0%	7	15.2%	14	30.4%	21
Total (2023)	33	2.0%	474	28.6%	331	20.0%	838
Total (2024)	25	1.5%	497	30.3%	344	21.0%	866
Change	-8	-24.2%	23	4.9%	13	3.9%	28

	Men						
	up to 30 year		30-50 years		over 50 year		
	The number of employees	% part of everyone	The number of employees	% part of everyone	The number of employees	% part of everyone	TOTAL :
Members of the management body (Board)	0	0.0%	7	63.6%	0	0.0%	7
Senior managers	0	0.0%	14	60.9%	2	8.7%	16
Middle managers	0	0.0%	16	59.3%	0	0.0%	16

Administration	22	4.7%	161	34.5%	34	7.3%	217
Drivers	0	0.0%	1	100.0%	0	0.0%	1
Qualified workers	1	1.0%	56	57.7%	33	34.0%	90
Unqualified workers	14	1.4%	182	18.7%	208	21.4%	404
Foreigners (citizenship)	5	10.9%	17	37.0%	3	6.5%	25
Total (2023)	51	3.1%	484	29.2%	284	17.1%	819
Total (2024)	42	2.6%	454	27.6%	280	17.1%	776
Change	-9	-17.6%	-30	-6.2%	-4	-1.4%	-43

In 2024, the number of staff decreased by 0.9% compared to the previous reporting year. The biggest change is in the under-30 age category.

	TOTAL:							
	up to 30 year		30-50 years		over 50 year		TOTAL L:	TOTAL (%)
	The number of employees	% part of everyone	The number of employees	% part of everyone	The number of employees	% part of everyone		
Members of the management body (Board)	1	9.1%	8	72.7%	2	18.2%	11	100.0%
Senior managers	0	0.0%	20	87.0%	3	13.0%	23	100.0%
Middle managers	0	0.0%	25	92.6%	2	7.4%	27	100.0%
Administration	33	7.1%	381	81.8%	52	11.2%	466	100.0%
Drivers	0	0.0%	1	100.0%	0	0.0%	1	100.0%
Qualified workers	1	1.0%	60	61.9%	36	37.1%	97	100.0%
Unqualified workers	27	2.8%	432	44.5%	512	52.7%	971	100.0%
Foreigners (citizenship)	5	10.9%	24	52.2%	17	37.0%	46	100.0%
Total (2023)	84	5.1%	958	57.8%	615	37.1%	1657	100.0%
Total (2024)	67	4.1%	951	57.9%	624	38.0%	1642	100.0%
Change	-17	-20.2%	-7	-0.7%	9	1.5%	-15	-0.9%

S1-6	S1-7	S1-9
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3.1.2. Human rights policy

Civinity strives to ensure equality and respect for human rights in all stages of the company's activities and to prevent discrimination of any kind. To achieve this, the company enforces two main policies:

1. Equal opportunity policy and its implementation procedure - to ensure equal treatment of all employees of the company and persons applying for employment, both before and after the conclusion of the employment contract, regardless of gender, race, nationality, language, origin, social status, religion, beliefs or opinions, age, sexual orientation, disability, ethnicity and/or religion.

2. Violence and harassment prevention policy - that sets out effective and efficient measures to protect employees from violence and harassment. The policy also helps employees to have a clear understanding of the possible manifestations of violence and harassment at work, to recognise the signs and to know the legal remedies.

See section 1.5 "Company policies" for more information .

S1-1

3.1.2.1. Impact, risks and opportunities

The company has a positive impact on its employees by implementing anti-violence and anti-harassment measures that increase employee safety and confidence in the working environment. The company has a Vindication department, which allows all employees to confidentially report harassment or violence via a dedicated mailbox (see section **4.2.3 Whistleblowing** for more information). In addition, internal training is provided on the mobbing prevention and its importance in raising awareness and fostering a culture of respect within the workforce.

S1-4

SBM-3

3.1.2.2. Actions and objectives

The company actively implements measures to combat violence and harassment in the workplace to ensure a safe and respectful working environment for all employees. Preventive measures are ongoing and their effectiveness will be continuously monitored and evaluated in the future. Below is a table with information on the company's actions, targets and indicators related to combating violence and harassment in the workplace.

Company actions, targets and indicators

Actions	Tasks	Indicators
Continue to make staff aware of the Violence and Harassment Prevention Policy and ensure the quality of their understanding of it.	Maintain 0 tolerance for violence and harassment in the workplace.	0% of confirmed cases of mobbing per year.
		100% of staff received training.

Ensure a clear and consistent feedback infrastructure that creates opportunities for staff to discuss challenges with their line manager, in a weekly meeting, or confidentially with the HR manager as appropriate.		
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S1-5

Policy implementation and monitoring

Human rights are upheld in all Civinity Group companies through business processes that include equal opportunities, social responsibility and the protection of human rights. However, each process takes into account objective criteria that may lead to exceptions to the policy.

The most senior position responsible for implementing the policy in the company is the General director. Civinity is not committed to third country standards or initiatives in the implementation of this policy.

Employee involvement and representation

Civinity actively considers the views of employees when making decisions to manage both actual and potential impacts on employees. Employees or their representatives are directly involved through a variety of channels depending on the type of impact: microclimate surveys, individual meetings, and the application of the guidelines set out in our Code of Ethics and other related rules (see [Stakeholder engagement](#) below).

These methods of engagement are applied at different levels of the organisation and include annual reviews, monthly, weekly and daily meetings, as well as interviews during the recruitment, employment probationary period and dismissal processes. The responsibility for promoting this inclusion and incorporating its results into the company's business strategy rests with the company's human resources manager. The effectiveness of such inclusion is measured through microclimate surveys and further evaluated through annual interviews.

For more information on the channels and procedures for reporting by staff, see section **4.2.3 Whistleblowing**.

Incidents

In 2024, we received 5 complaints about guaranteed employment, working hours and decent pay. After a thorough investigation of the circumstances, none of the complaints were upheld. In 2023, we received 3 complaints relating to decent pay and violence and harassment in the workplace. After examining all the circumstances, none of the complaints were found to be substantiated incidents. Similarly to the previous reporting year, we did not receive any complaints of discrimination in 2023.

S1-1	S1-2	S1-3	S1-17
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3.1.3. Working conditions

3.1.3.1. Impact, risks and opportunities

The topic of working conditions in Civinity's activities covers both the positive impact on employee well-being and the material risks associated with human resources. The company faces challenges in attracting and retaining specialists with specific skills, particularly in the HVAC field, which increases the risk of staff turnover and may affect business continuity. There is also a reluctance of employees to work on-call time, which limits flexibility in organising working time. Nevertheless, the company is implementing best practices by offering a hybrid working model, more flexible schedules, extra benefits and a shorter working week in certain structures, thus promoting employee satisfaction and motivation. Work-life balance also remains an important topic - for some employees, on-call time and high demands from managers can lead to burnout and lower job satisfaction.

S1-4	SBM-3
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3.1.3.2. Actions and objectives

Below is a table with information on the company's actions, targets and indicators related to the working conditions of temporary workers.

Company actions, targets and indicators

Actions	Tasks	Indicators
Develop a diversity and inclusion policy	Embed the principles of equal opportunities and a respectful working environment	Staff awareness of the policy - 100%
Review the benefits package offered to full-time staff	Update the benefits package according to identified needs	Change in employee satisfaction level (%) after the update

S1-5

3.1.3.3. Staff turnover

The annual staff turnover rate is used to calculate staff turnover. The annual rate of change is calculated according to the formula:

Formula:	
Staff turnover rate =	$\frac{\text{Total number of employees who left voluntarily or were dismissed or retired}}{\text{Total number of employees at the start of the year}}$

Number of employees at the end of the year

Staff turnover rate for the year 2024¹²

	2023		2024	
	Number	%	Number	%
Retired employed staff	527	31.80%	693	42.20%

S1-6

3.1.3.4. Decent wage

All salaries in the company comply with national laws, as set out in Directive (EU) 2022/2041 of the European Parliament and of the Council of 19 October 2022 on adequate minimum wages in the European Union. The wages paid to employees are between the minimum and average wages, according to sector benchmarks. For administrative staff, salaries are set according to market benchmarks and above the market average. Periodic analysis of wages in the labour market.

Male and female employee wage gap¹³

€	2023			2024		
	Women	Men	Ratio	Women	Men	Ratio
Average remuneration (per month)	1508.00	2098.00	28.12%	1675.00	2321.00	27.83%

The pay gap between the highest and the lowest paid employees in the company is large, mainly due to the nature of Civinity Solutions' activities. This part of the company employs a large

¹² The staff turnover rate is calculated as follows: the total number of employed staff who leave voluntarily or are dismissed, retire or die in the line of duty divided by the number of employed staff at the end of the year.

¹³ The gender pay gap is calculated using the following formula: subtract the average hourly earnings after tax of female employees from the average hourly earnings before tax of male employees, divide the result by the average hourly earnings before tax of male employees and multiply by 100.

number of cleaning employees, often paid at the national minimum wage. This has a material impact on the overall distribution of rewards across the group.

Civinity's total annual remuneration ratio¹⁴

€	2023	2024
Remuneration of the person with the highest salary	269987	164689
Average staff remuneration	21698	24422
Ratio	12.44	6.74

S1-10	S1-16
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3.1.3.5. Welfare package

The co-benefits focus on the emotional balance, financial security, health and professional growth of administrative staff. These include material benefits for special occasions, health insurance, events and flexible working hours.

Company welfare package

Name	Description
Accommodation	Comfortable living conditions for our employees.
Gifts for children of employees.	Gifts for children of employees.
Christmas gifts	Festive gifts that spread holiday cheer.
Health insurance during work	We make sure employees are covered by health insurance during work.
Birthday gifts	The company gives you an extra day of paid holiday on your birthday.
Organised events	Organising events to promote a sense of community among staff.
Vaccinations	The company reimburses flu and tick-borne encephalitis vaccinations (for employees doing outdoor work)
Payouts	Death of a family member, marriage, birth of a child, employee's anniversary

¹⁴ The annual total remuneration ratio is calculated according to the formula and guidelines set out in the ESRS Standard S1-16 TR 101 Application Requirements. It is calculated using the formula: the annual gross remuneration of the highest paid person in the company divided by the average annual gross remuneration of hired employees (excluding the highest paid person)

Payouts	For a new recruit who successfully completes a probationary period
Work schedule	Hybrid working model - an employee can work from home 1 day a week. The start and end times of an employee's work may be individually agreed with the employee

S1-4

3.1.3.6. Social security

Our company provides social security for all employees to protect them against loss of income during major life events. These guarantees apply both under public programmes and through the benefits we offer. Our employees are financially protected in the event of sickness, unemployment (while working for the company), accidents at work or acquired disability, as well as in the event of parental leave or retirement. We are committed to providing these guarantees to all our employees so they can feel safe and secure.

S1-11

3.1.4. Social dialogue

To ensure social dialogue with our employees, we follow an equal opportunities policy, a policy on the prevention of violence and harassment, and a workplace policy. See section [1.5 "Company policies"](#) for more information .

S1-1

3.1.4.1. Impact, risks and opportunities

Strengthening social dialogue at *Civinity* has a positive impact on organisational culture, with cooperation between management and employees contributing to greater trust, transparency and a better microclimate. However, employee passivity or a lack of information can lead to work councils not forming or being inactive, which increases the risk of employees' interests being overlooked and potential breaches of labour law. At the same time, the active involvement of employees in decision-making, through existing councils or other dialogue mechanisms, is an opportunity to strengthen engagement, loyalty and more sustainable management of the organisation.

S1-4

SBM-3

3.1.4.2. Actions and objectives

Below is a table with information on the company's actions, targets and indicators related to social dialogue.

Company actions, targets and indicators

Actions	Tasks	Indicators
Encourage social dialogue with employees' representatives, keeping them regularly informed and consulted.	Labour council established and running	The participation rate of the members of the Labour council in the monthly meetings is 90%.

S1-5

3.1.5. Health and safety

All Civity employees are covered by a health and safety management system that complies with legal requirements. See section [1.5 "Company policies"](#) for more information .

S1-1

3.1.5.1. Impact, risks and opportunities

During the dual materiality assessment, it was determined that the employees of the Civity group of companies are exposed to adverse health and safety impacts due to the nature of their activities, which include building maintenance, installation, repair and administration of engineering systems. These activities are inevitably related to physical work, electrical installations and other high-risk situations, therefore employees may suffer injuries or health problems. The company applies measures to help prevent accidents at work - employees are provided with all necessary safety equipment and are additionally insured against accidents at work.

Taking into account the identified risks, Civity applies active health and safety measures to reduce the potential negative impact on employees.

However, one of the main risks is non-compliance with health and safety requirements, which can lead to accidents, including fatalities. If not managed properly, these risks can have a material negative impact not only on the safety and life of employees, but also on the company's reputation.

S1-4	SBM-3
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3.1.5.2. Actions and objectives

Actions	Tasks	Indicators
Establish a process for mandatory health and safety training for all employees	Ensuring that all employees receive health and safety training	100% of all staff have reviewed the scheduled training and passed the knowledge test.
Develop a health and safety policy	Establishing a coherent approach to occupational safety and health	All staff are aware of the policy
Implement preventive measures and strengthen safety culture	Reduce work-related injuries by 20%	Number of work-related injuries

S1-5

Below is information on work-related incidents.

Work-related incidents in 2024¹⁵

		2024
		Own workforce
		Employed staff
Deaths due to work-related <u>injuries</u>	Number	0
Deaths due to work-related <u>health problems</u> **	Number	0
Recordable work-related <u>injuries</u>	Number	5
	Indicator	0.00
Fatal cases	Number	0
	Indicator	0

¹⁵ The concept of work-related incidents (deaths, injuries and health problems), the indicators and the number of working days lost shall be applied in the context of the guidelines as described in the S1-14 application requirements.

Severe cases	Number	0
	Indicator	0
Mild cases	Number	5
	Indicator	0.00
Recordable work-related <u>health problems</u>	Number	0
Fatal cases	Number	0
Severe cases	Number	0
Mild cases	Number	0

S1-14

3.1.6. Training and skill development

Training and skills development for Civinity staff is provided in accordance with the rules of procedure. See section 1.5 "Company policies" for more information .

S1-1

3.1.6.1. Impact, risks and opportunities

The company has a significant positive impact on its employees by providing them with systematic professional development opportunities through the Civinity Academy training. This learning platform provides staff with the opportunity to continuously improve their competences through training sessions led by external experts as well as by experienced in-house specialists. The training programmes cover both technical competences and the universal skills needed in today's working environment.

In the future, we see great potential to further strengthen the work of the Civinity Academy by expanding its educational impact. We plan to develop new, specialised training programmes tailored to staff of different levels and areas of employment. We also intend to introduce a system of individual learning plans to personalise each employee's professional development path according to his career goals and the needs of the company. In this way, we will not only meet the current learning needs of our employees, but also develop a long-term, forward-looking culture of competence development throughout the organisation.

S1-4	SBM-3
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3.1.6.2. Actions and objectives

Actions	Tasks	Indicators
Organise training on sustainability	Increase in the number of employees receiving sustainability training by 10%	Number of staff participating in sustainability training (% change)
Provide opportunities for staff to develop their skills	Increase in the number of staff with improved competences by 20%	Proportion of staff who have improved their competences (% of total staff)
Perform the evaluation of the quality of training and take improvement measures	Improve the quality of training provided (where quality deficiencies are identified)	Assessment of the quality of training

S1-5

Annual staff performance appraisal

The annual staff performance appraisal is carried out systematically once a year. The implementation and quality of this process is the responsibility of company managers and line managers, who are directly responsible for carrying out the evaluation procedure, recording the results and drawing up plans for further development.

Staff performance indicators for 2024

	2023		2024	
Number of staff who have had a review	Number	%	Number	%
Women	70	3.9%	86	5.0%
Men	77	4.3%	81	4.7%

Training for staff

Currently, we do not have a systematic methodology to measure and account for the hours of training completed by staff per year. Although we provide a variety of training through the Civinity Academy platform, this specific indicator - the number of staff and the number of learning hours they accumulate - has not been included in our regularly monitored performance indicators so far.

Given the importance of training for staff development and organisational development, we plan to include this indicator in our regular monitoring in the near future. This will not only allow us to track the effectiveness of training resources, but also to better understand staff engagement in

professional development activities, identify gaps, and identify more targeted learning opportunities for the future.

		Hours of staff training in 2024	
		2023	2024
Number of hours offered to	Number of hours of training offered	40	55
	Employee	0.02	0.03
	Female employee	0.04	0.06
	Male employee	0.05	0.07
Hours of training completed by	Hours of training completed	no data	no data
	Employee	no data	no data
	Female employee	no data	no data
	Male employee	no data	no data

S1-13

3.1.7. Diversity, inclusion and equal opportunities

To ensure diversity, inclusion and equal opportunities, we base our activities on the Equal opportunities policy and its implementation procedures. See section [1.5 "Company policies"](#) for more information .

S1-1

3.1.7.1. Impact, risks and opportunities

Promoting diversity in the company has a positive real impact on both employee well-being and the company's performance. The company's standard policies and internal procedures ensure non-discrimination on the basis of age, sex, religion or other personal characteristics. There are no

barriers or practices that could limit the diversity of the workforce or the ability to engage in the organisation.

S1-4	SBM-3
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3.1.7.2. Actions and objectives

The Diversity, inclusion and equal opportunities strategy will be disclosed in the next report, once it has been fully developed and evaluated.

S1-5

3.1.7.3. Gender distribution in top management

Civinity's top management consists of 11 persons, of whom 4 are women (36%) and 7 are men (64%). Although the proportion of women is still lower than that of men, the company aims to further strengthen the principles of inclusion and to promote equal opportunities for all genders at the highest levels of management.

Distribution of men and women in top management .

	Women	% part of everyone	Men	% part of everyone	Total:
Top management	4	36%	7	64%	11

S1-9

3.1.7.4. Persons with disabilities

The company does not currently have accurate, structured information on the number of employees with disabilities. Under Lithuanian law, employees with disabilities are not obliged to inform their employer of their disability if it does not affect the person's ability to work. As such data has not been collected systematically, the company is not in a position to provide this information at this time.

S1-12

3.1.7.5. Work-life balance

All employees are entitled to family leave. This right is guaranteed under current national law.

2024 Family leave for staff

	2024					
	Women	% part of everyone	Men	% part of everyone	Total:	% part of everyone
Entitled to family leave	501	27.97%	489	27.30%	990	55.28%
Exercised family leave entitlement	17	3.39%	9	1.84%	26	2.63%

S1-15

3.2. Value chain employees

Value chain employees are an important topic for all the activities of the Civity Group of companies, as the conditions of employees in the supply chain affect the quality of activities and the reputation of our company.

3.2.1.1. Impacts, risks and opportunities

The dual materiality assessment identified that there are adverse health and safety impacts for employees in the Civity Group's value chain. As Civity activities include building maintenance, administration and engineering services, employees of suppliers, contractors and other partners may be exposed to risks of injury, accidents or ill health in the workplace. These risks may have a negative impact not only on employee well-being but also on the company's reputation. Potential negative impacts due to non-compliance with safety requirements by contractors or service providers include potential delays, reputational damage and customer dissatisfaction.

The company is currently monitoring and assessing the safety standards and risk management measures applied by suppliers and partners, and in the future it is planned to identify specific actions and objectives to manage these risks. These actions and objectives will be included in future reports in order to ensure consistent risk management and compliance with safety standards throughout the value chain.

S2

3.3. Affected communities

The topic of affected communities is not recognised as material to Civinity's operations, as the company's activities do not have a direct or significant impact on the social, economic or environmental condition of local communities. "Civinity" provides building maintenance, management and engineering solutions services that focus on maintaining the condition and comfort of its clients' assets, but do not involve community development or significant infrastructure changes that would normally have a direct impact on the quality of life of residents. Therefore, this topic has been excluded from the report for the purposes of assessing materiality. Nevertheless, we are aware that indirect impacts on communities may occur through the activities of partners or clients, so the topic is being monitored and may be reviewed in the future if necessary.

S3

3.4. Consumers and end-users

The topic of users and end-users has been identified as material to Civinity's activities in the context of a dual materiality assessment. The evaluation identified positive impacts in terms of ensuring the personal safety of users and end-users by lighting stairwells and areas, installing CCTV cameras, ensuring slip-resistant staircases and a safe environment during the cold season, carrying out pest control, disinfection, hydraulic testing, maintaining and testing equipment (such as lifts) and regular maintenance of buildings, which helps to prevent accidents and damages.

Despite the materiality of the topic, a detailed description and specific performance indicators are not provided at this stage of the report. We aim to ensure accurate, complete and reliable information, so indicators and a broader explanation of this topic will be included in subsequent reports once specific actions and objectives are formulated.

S4

4. MANAGEMENT INFORMATION

4.1. Business ethics policy and company culture

Our company culture is based on four core values - one team, sustainable results, innovation and people. These values shape our organisational structure, leadership principles and day-to-day decisions.

We make a concerted effort to educate our employees about the rules and expectations set out in the Code of Conduct, emphasising their importance in relation to their job responsibilities. Staff members are made aware of the code of ethics at the time of employment and whenever changes are made. The signed form confirms that they have read, understood and agreed to abide by the code. Ignorance of or failure to sign the code does not relieve an employee of the obligation to comply with it. Violation of the code constitutes a failure to fulfil work obligations and is punishable by disciplinary action.

G1-1

4.1.1. Impact, risks and opportunities

The company has a positive impact because a clearly defined mission, vision and values help to create a cohesive company culture. Civinity's work is based on clear values that promote collaboration, responsibility and continuous improvement. For more information on the company's mission, vision and values, please visit the official website www.civinity.com.

The company's activities are guided by the Code of ethics, the Zero tolerance policy, the Customer service standard, the Equal opportunities policy and its implementation procedures, and the Personal data processing policy. See section [1.5 "Company policies"](#) for more information .

SBM-3

4.1.2. Actions and objectives

Actions	Tasks	Indicators
Incorporate activities in periodic company events to promote mutually defined values	Align company values and behaviours with employees	All administrative employees are aware of the company's positioning and act on it (positive quality assessment indicators)

4.2. Protection of Notifiers

4.2.1. Impact, risks and opportunities

The company makes a positive impact by providing a safe working environment where employees are encouraged to report misconduct and possible violations. To protect whistleblowers and ensure transparency, the company has a whistleblower protection procedure that allows employees to confidentially report information about possible violations. A dedicated system is in place, including a dedicated email address for anonymous reporting of illegal acts or breaches of work ethics.

To ensure the protection of whistleblowers, we follow the whistleblowing procedure description. See section [1.5 "Company policies"](#) for more information .

4.2.2. Actions and objectives

Actions	Tasks	Indicators
Description of the whistleblowing procedure is prepared under whistleblower protection legislation	Establish and maintain an infrastructure to protect whistleblowers.	Whistleblower protection violations - 0

4.2.2.1. Violation notifications

It is the responsibility of the Company's managers to ensure that the Policy is properly communicated and implemented, and that existing and new Employees reporting to them are made aware of and comply with the provisions of the Policy. In order to ensure transparency of corporate processes, the Vindication unit carries out planned and systematic analyses of the regulation and practical implementation of the most risky corporate processes and makes recommendations for their improvement. Any employee, business partner or customer of the Company who has encountered unfair behaviour by Company employees has the opportunity to report it to the Company's Vindication department at +370 621 15287 or by e-mail at pranesk@civinity.com

The availability and effectiveness of channels is ensured:

- Employees are informed about help channels in their employment contracts and internal procedures.
- Weekly meetings monitor indicators, analyse the resolution of complaints and raise issues. If the problem recurs, an action plan is drawn up, a timeframe for a solution is set and implementation is monitored.
- The number of complaints received through the different channels is analysed, and decisions can be made on process improvements based on this data.

The company aims to ensure that employees feel safe and have a clear opportunity to report violations, and that each report is dealt with in a timely manner, in accordance with the principles of confidentiality and objectivity.

G1-1

4.3. Supplier relationship management

Civinity takes an integrated approach to supplier management. Before entering into a business relationship, a company carries out a thorough creditworthiness check on its suppliers. The supplier selection process includes not only an assessment of financial aspects, but also social and environmental criteria to ensure that suppliers comply with legal requirements. Additional checks are made on the status of potential partners in public databases, including the State Register of Waste Managers (SRWM).

Currently, the company does not have a formal policy in place to prevent late payments to small to medium business companies. Nevertheless, processes to ensure timely settlements with all business partners and policies are in place.

4.4. Prevention of corruption and bribery

In order to foster a transparent and responsible organisational culture, the company has adopted a Zero tolerance policy for unfair behaviour, effective from 2024.

The company has internal reporting channels in place and has designated staff responsible for managing the messages they receive, who are trained to deal with the information they receive. Whistleblowers are protected through the principles of confidentiality and anonymity throughout and after the investigation.

4.4.1. Positions vulnerable to corruption

Persons that are most at risk of corruption and bribery are those in senior positions and procurement staff. These posts are given special attention to ensure that their performance meets the highest standards of ethics and transparency.

G1-1

4.4.1.1. Corruption and bribery incidents

The company has not received any convictions for breaches of anti-corruption and anti-bribery laws. Nor have any fines been imposed for these infringements.

G1-4

4.5. Cybersecurity and privacy

4.5.1. Impact, risks and opportunities

Civinity has a positive impact on stakeholders by ensuring cyber security prevention, data protection and privacy. In order to maximise the protection of sensitive information, we work with external providers of cyber security services and continuously look for new solutions to strengthen data protection mechanisms and prevent potential breaches. Despite our best efforts, cyber incidents can pose financial and reputational risks. Leaks of data such as account numbers, personal data or addresses can have serious consequences, including financial losses in terms of compensation or fines, as well as damage to a company's reputation and a loss of trust with customers and partners.

To ensure cybersecurity and privacy, we follow the Personal data processing policy, the Personal data retention policy and the Employee personal data retention policy. See section [1.5 "Company policies"](#) for more information .

SBM-3

4.5.2. Actions and objectives

Actions	Tasks	Indicators
Training is prepared and available to all staff.	Make staff aware of cyber security, risks and prevention measures	0 critical cybersecurity breaches per year
Implementation of the cybersecurity directive	Ensuring the quality of the organisation of activities in compliance with the legislation in force	High-quality and timeliness of implementation of the safety directive

4.6. Payment practice

Civinity's average deferral¹⁶ period for payments for goods and services is 30-45 days after the payment due date. The standard payment term for most suppliers is 30 days, but in some cases it can be up to 12 calendar months. This applies to contractors carrying out major renovation works in managed homes, if residents are given a lease period to pay for the work completed. Around 50% of payments are made within these deadlines.

There are currently no pending court cases related to late payments to suppliers.

G1-6

¹⁶ The average deferral period is calculated using the formula: debts owed to suppliers divided by the average daily cost, so it reflects the real situation and no representative sample is used.

Annex 1. ESRS disclosure requirements included in the corporate sustainability report

Disclosure requirement (DR) and related data units	ESRS	Link to TF1AR ¹⁷	Reference to Pillar 3 of the Basel III framework ¹⁸	Reference to the Benchmark regulation ¹⁹	Link to EU climate legal act ²⁰	Materiality
2 ESRS GOV-1 Gender balance on the board	21 d	Annex 1 table 13 indicator		Annex II to Commission Delegated Regulation (EU) 2020/1816 ²¹		Material
2 ESRS GOV-1 Percentage of independent board members	21 e			Annex II to Commission Delegated Regulation (EU) 2020/1816		Material
2 ESRS GOV-4 Declaration of due diligence	30	Annex 1, Table 3, indicator 10		Annex II to Commission Delegated Regulation (EU) 2020/1816		Material
2 ESRS SBM-1 Participation in fossil fuel related activities	40 i	Annex 1, Table 1, indicator 4	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU)	Annex II to Commission Delegated Regulation (EU) 2020/1816		Non-material

¹⁷ Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable financing disclosure regulation, SDFR)(OL L 317, 2019 12 09, p. 1).

¹⁸ Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms, amending Directive 2002/87/EC Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (Capital requirements regulation, CRR) (OL L 176, 2013 06 27, p. 1).

¹⁹ Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (General index regulation) (OL L 171, 2016 06 29, p. 1).

²⁰ Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ("European Climate Law")(OL L 243, 2021 07 09, p. 1).

²¹ 17 July 2020 Commission Delegated Regulation (EU) 2020/1816 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards the explanation in the benchmark statement of how environmental, social and governance factors are reflected in each benchmark provided and published (OL L 406, 2020 12 03, p. 1).

			2022/2453 ²² Table 1: Qualitative information on environmental risks and Table 2: Qualitative information on social risks			
2 ESRS SBM-1 Participation in activities related to the production of chemicals	40 d ii	Annex 1, Table 2, indicator 9		Annex II to Commission Delegated Regulation (EU) 2020/1816 ²³		Non-material
2 ESRS SBM-1 Participation in activities related to controversial weapons	40 d iii					Non-material
2 ESRS SBM-1 Participation in activities related to tobacco production and cultivation	40 d iv					Non-material
E1-1 ESRS Roadmap for moving to a climate- neutral economy by 2050	14					To be applied gradually
E1-1 ESRS Enterprises not covered by benchmarks aligned to the Paris Agreement	16 g					To be applied gradually
E1-4 ESRS GHG emission reduction targets	34					To be applied gradually
E1-5 ESRS Fossil energy consumption broken down by source (only for sectors with high climate impact)	38					Non-material

²² Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 amending the implementing technical standards laid down in Implementing Regulation (EU) 2021/637 as regards the disclosure of environmental, social and governance risks (OL L 324, 2022 12 19, p. 1).

²³ 17 July 2020 Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks (OL L 406, 2020 12 03, p. 17).

E1-5 ESRS Energy consumption and mix	37					Material
E1-5 ESRS Energy intensity related to the activities of sectors with significant climate impacts	40–43					Material
E1-6 ESRS Combined Tier 1, Tier 2 and Tier 3 and total GHG emissions	44					Material
E1-6 ESRS Energy intensity of total GHG emissions	53–55					Material
E1-7 ESRS GHG absorption and carbon credits	56					Non-material
E1-9 ESRS Exposure of the benchmark portfolio to climate-related physical risk	66					Non-material
E1-9 ESRS Breakdown of cash amounts by acute and chronic physical risk	66 a					To be applied gradually
E1-9 ESRS Determining the location of assets subject to material physical risk	66 c					To be applied gradually
E1-9 ESRS Breakdown of the carrying amount of the company's real estate by energy efficiency class	67 c					To be applied gradually
E1-9 ESRS Portfolio exposure to climate-related opportunities	69					To be applied gradually
E2-4 ESRS Amount of each pollutant listed in Annex II of the European Pollutant Release and Transfer Register (E-PRTR) emitted to air, water and soil	28					Non-material
E3-1 ESRS Water and marine resources	9					Non-material
E3-1 ESRS Adopted policy	13					Non-material

E3-1 ESRS Sustainable oceans and seas	14					Non-material
E3-4 ESRS Total amount of water recycled and reused	28 c					Non-material
E3-4 ESRS Total water consumption (m3) by net revenue of own operations	29	Annex 1, Table 3, Indicator 7				Non-material
2 ESRS IRO 1 - E4	16 a i	Annex 1, Table 2, Indicator 10				Non-material
2 ESRS IRO 1 - E4	16 b	Annex 1, Table 2, Indicator 14				Non-material
2 ESRS IRO 1 - E4	16 c	Annex 1, Table 2, Indicator 11				Non-material
E4-2 ESRS Sustainable land use/agricultural practices or policies	24 b	Annex 1, Table 2, Indicator 12				Non-material
E4-2 ESRS Sustainable water/marine use practices or policies	24 c	Annex 1, Table 2, Indicator 15				Non-material
E4-2 ESRS Policies to address deforestation	24 d	Annex 1, Table 2, Indicator 13				Non-material
E5-5 ESRS Unsorted waste	37 d	Annex 1, Table 1, Indicator 9				Non-material
E5-5 ESRS Hazardous waste and radioactive waste	39	Annex 1, Table 3, Indicator 13				Non-material
2 ESRS - SBM3 - S1 Risk of forced labour incidents	14 f	Annex 1, Table 3, Indicator 12				Non-material
2 ESRS - SBM3 - S1 Risk of child labour incidents	14 g	Annex 1, Table 3, Indicator 9 and Table 1, Indicator 11				Non-material
S1-1 ETAS Human rights policy commitments	20			Commission delegated regulation (EU)		Material

S1-1 ESRS Comprehensive verification policy applicable to aspects covered by ILO Core Conventions 1-8	21		2020/1816 Annex II			Material
S1-1 ESRS Processes and tools to prevent trafficking in human beings	22	Annex 1, Table 3, Indicator 11				Non-material
S1-1 ESRS Occupational accident prevention policy or management system	23	Annex 1, Table 3, Indicator 1				Material
S1-3 ESRS Complaints submission and/or handling mechanism	32 c	Annex 1, Table 3, Indicator 5				Material
S1-14 ESRS Number and sex of deaths and work-related accidents	88 b and c	Annex 1, Table 3, Indicator 2		Annex II to Commission Delegated Regulation (EU) 2020/1816		Material
S1-14 ESRS Number of working days lost due to injury, accident, death or illness	88 e	Annex 1, Table 3, Indicator 3				Material
S1-16 ESRS Unadjusted gender pay gap between men and women	97 a	Annex 1, Table 1, Indicator 12		Annex II to Commission Delegated Regulation (EU) 2020/1816		Material
S1-16 ESRS Excessive pay weighting for the executive director	97 b	Annex 1, Table 3, Indicator 8				Material
S1-17 ESRS Discrimination cases	103 a	Annex 1, Table 3, Indicator 7				Material
S1-17 ESRS Failure to comply with the UN Guiding Principles on Business and Human Rights and OECD recommendations	104 a	Annex 1, Table 1, Indicator 10 and Table 3, Indicator 14		Annex II to Commission Delegated Regulation (EU) 2020/1816, Commission Delegated Regulation (EU)		Material

				2020/1818, Article 12, part 1		
S2 ESRS - SBM3 - S2 High risk of child labour or forced labour in the value chain	11 b	Annex 1, Table 3, Indicator 12 and 13				Non-material
S1-1 ESRS Human rights policy commitments	17	Annex 1, Table 3, Indicator 9 and Table 1, Indicator 11				Non-material
S2-1 ESRS Policy on value chain employees	18	Annex 1, Table 3, Indicator 11 and 4				Non-material
S2-1 ESRS Failure to comply with the UN Guiding Principles on Business and Human Rights and OECD recommendations	19	Annex 1, Table 3, Indicator 10		Annex II to Commission Delegated Regulation (EU) 2020/1816, Commission Delegated Regulation (EU) 2020/1818, Article 12, part 1		Non-material
S2-1 ESRS Comprehensive verification policy applicable to aspects covered by ILO Core Conventions 1-8	19					Non-material
S2-4 ESRS Human rights issues and incidents related to upstream and downstream parts of the value chain	36	Annex 1, Table 3, Indicator 14				Non-material
S3-1 ESRS Human rights policy commitments	16	Annex 1, Table 3, Indicator 9 and Table 1, Indicator 11				Non-material
S3-1 ESRS Non-compliance with UN Guiding Principles on Business and Human	17	Annex 1, Table 3, Indicator 10		Annex II to Commission Delegated Regulation (EU) 2020/1816,		Non-material

Rights, ILO Principles and OECD Recommendations				Commission Delegated Regulation (EU) 2020/1818, Article 12, part 1		
S3-4 ESRS Human rights issues and incidents	36	Annex 1, Table 3, Indicator 14				Non-material
S4-1 ESRS Consumer and end-user related policies	16	Annex 1, Table 3, Indicator 9 and Table 1, Indicator 11				Material
S4-1 ESRS Failure to comply with the UN Guiding Principles on Business and Human Rights and OECD recommendations	17	Annex 1, Table 3, Indicator 10		Annex II to Commission Delegated Regulation (EU) 2020/1816, Commission Delegated Regulation (EU) 2020/1818, Article 12, part 1		Material
S4-4 ESRS Human rights issues and incidents	35	Annex 1, Table 3, Indicator 14				Non-material
G1-1 ESRS United Nations Convention against Corruption	10 b	Annex 1, Table 3, Indicator 15				Material
G1-1 ESRS Protection of whistleblowers	10 d	Annex 1, Table 3, Indicator 6				Material
G1-4 ESRS Fines for infringements of anti-corruption and anti-bribery laws	24 a	Annex 1, Table 3, Indicator 17			Annex II to Delegated Regulation (EU) 2020/1816	Material
G1-4 ESRS Anti-corruption and Anti-bribery standards	24 b	Annex 1, Table 3, Indicator 16				Material

Annex 2. List of disclosure requirements under ESRS

Code	Title, reference to the part of the report
2 ESRS	General disclosures
BP-1	Common framework for sustainability reporting
BP-2	Disclosure of information relating to special circumstances
GOV-1	Role of administrative, management and supervisory bodies
GOV-2	Information provided to and sustainability issues addressed by the company's administrative, management and supervisory bodies
GOV-3	Integrating sustainability-related performance into incentive schemes
GOV-4	Declaration of due diligence
GOV-5	Sustainability reporting risk management and internal control
SBM-1	Market situation, strategy, business model(s) and value chain
SBM-2	Stakeholder subjects' interests and opinions
SBM-3	Material impact, risks and opportunities and their interaction with strategy and business model(s)
IRO-1	Description of the processes for identifying and assessing material impacts, risks and opportunities
IRO-2	ESRS disclosure requirements included in the corporate sustainability reports
E1	Climate change
2 ESRS GOV-3-E1	Integrating sustainability-related performance into incentive schemes
E1-1	A transformation plan to mitigate climate change
2 ESRS SBM-3-E1	Material impact, risks and opportunities and their interaction with strategy and business model
2 ESRS IRO-1-E1	Description of the processes for identifying and assessing material impacts related with climate, the risks and opportunities
E1-2	Policies related to climate change mitigation and adaptation
E1-3	Actions and resources related to climate change policy
E1-4	Tasks related to climate change mitigation and adaptation
E1-5	Energy consumption and energy type mix
E1-6	Total emissions of Scope 1, 2 and 3 GHG emissions and total GHG emissions
E1-7	GHG absorption and GHG quantity reduction projects financed by carbon credits
E1-8	Carbon self-appraisal
E1-9	Estimated financial impact of significant climate-related physical and transformational risks and

	potential opportunities
E2	Pollution
E3	Water and marine resources
E4	Biodiversity and ecosystems
E5	Resource use and the circular economy
S1	Own workforce
2 ESRS SBM-2-S1	Stakeholder subjects' interests and opinions
2 ESRS SBM-3-S1	<p>Material impact, risks and opportunities and their interaction with strategy and business model:</p> <ul style="list-style-type: none"> • Human rights policy • Working conditions • Social dialogue • Health and safety • Training and skill development • Diversity, inclusion and equal opportunities
S1-1	Policies related to own workforce
S1-2	Processes for involving own employees and employees' representatives in impact issues
S1-3	Processes for correcting negative impacts and channels through which own employees can raise concerns
S1-4	<p>Actions taken to address material impacts on own workforce, methods of mitigating material risks to own workforce and taking advantage of material opportunities, and the effectiveness of those actions:</p> <ul style="list-style-type: none"> • Human rights policy • Working conditions • Social dialogue • Health and safety • Training and skill development • Diversity, inclusion and equal opportunities
S1-5	<p>Challenges related to managing material negative impacts, maximising positive impacts and managing material risks and opportunities</p> <ul style="list-style-type: none"> • Human rights policy • Working conditions • Social dialogue • Health and safety • Training and skill development • Diversity, inclusion and equal opportunities
S1-6	Characteristics of the company's employees
S1-7	Characteristics of non-employees classified as own workforce
S1-8	Coverage of collective agreements and social dialogue
S1-9	Diversity indicators
S1-10	Decent wage

S1-11	Social security
S1-12	Persons with disabilities
S1-13	Indicators for training and skills development
S1-14	Health and safety indicators
S1-15	Work-life balance indicators
S1-16	Compensation indicators (pay gap and general compensation)
S1-17	Incidents, complaints and strong human rights impacts
S2	Value chain employees
S3	Affected communities
S4	Consumers and end-users
2 ESRS SBM-2-S4	Stakeholder subjects' interests and opinions
2 ESRS SBM-3-S4	Material impact, risks and opportunities and their interaction with strategy and business model
S4-1	Consumer and end-user related policy
S4-2	Processes for involving consumers and end-users in impact issues
S4-3	Processes and channels for correcting adverse effects, through which users and/or end-users can raise concerns
S4-4	Actions taken in relation to material impacts on consumers and end-users, methods of managing material risks and using material possibilities, related to consumers and end-users and the effectiveness of those actions
S4-5	Challenges related to managing material negative impacts, maximising positive impacts and managing material risks and opportunities
G1	Business ethics
2 ESRS SBM-3-G1	Stakeholder subjects' interests and opinions
2 ESRS GOV-1-G1	Role of administrative, supervisory and management bodies
2 ESRS IRO-1-G1	Description of the processes for identifying and assessing material impacts, risks and opportunities
G1-1	Company culture and business ethics policy
G1-2	Supplier relationship management
G1-3	Preventing and detecting corruption and bribery
G1-4	Confirmed incidents of corruption or bribery
G1-5	Political influence and lobbying (Non-material)

G1-6	Payment practice
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