

ENVIRONMENTAL SOCIAL GOVERNANCE (ESG) POLICY

2026

TECŌM GROUP

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1 SCOPE & DEFINITIONS

1.1 Policy Vision

- Our vision is to lead the curation of innovative ecosystems that drive sustainable growth and future development.

1.2 Purpose

- TECOM Group PJSC is dedicated to building thriving ecosystems that empower our clients, and power the future of Dubai. Our multifaceted operations encompass offices, logistics, worker accommodations and land leasing, seamlessly integrating global leading companies, regional powerhouses, and dynamic Small Medium Enterprises (SMEs) within our six bustling business districts. Complementing this synergy, we extend critical government and business services to our customers and the broader community. Aligned with our overarching mission, we are steadfastly committed to optimising core business functions, developing differentiated value propositions, and building new sources of growth.
- As a major portion of our operations is in the built environment, we acknowledge the impact of our operations, and the pivotal role we play in climate action. The real estate sector shoulders a key responsibility, with buildings globally contributing around %40 of global emissions, %28 of which stem from operational activities. This underscores the pressing imperative for real estate entities, including ours, to curtail emissions, and mitigate environmental footprints. Throughout our business operations, including services, we recognise our pivotal role in generating sustained economic value, while fostering social cohesion and societal progress. At TECOM Group, we have a responsibility towards our stakeholders; be it our esteemed business partners, tenants, communities, shareholders, or dedicated employees, to preserve economic, environmental and social value.

1 SCOPE & DEFINITIONS

- The purpose of TECOM Group’s Environmental, Social and Governance (ESG) Policy (henceforth “Policy”) is to embed ESG principles within our operations. By integrating ESG considerations into our purpose and values, we not only fortify our strategic objectives but also lay the foundation for sustained growth and holistic development. At TECOM Group, our journey towards a prosperous future is intrinsically linked with our dedication to responsible and sustainable practices that safeguard the interests of all stakeholders and contribute meaningfully to broader society.

1.3 Scope

- This Policy applies to all our business districts, business segments and internal operations.

1.4 Policy Objectives

- Promote robust governance and ethical standards in line with our Code of Conduct, expecting the same from our suppliers and partners.
- Pioneer environmental stewardship within the real estate sector in UAE by promoting efficient and responsible consumption of natural resources, minimising our environmental impact, and continuously improving energy efficiency.
- Build a resilient portfolio by investing in high-quality, sustainable infrastructure to mitigate climate risks, including natural hazards and extreme weather events.
- Engage in and advocate for global climate action initiatives, by actively working towards reducing our carbon footprint.

1 SCOPE & DEFINITIONS

- Ensure the health, safety, and wellbeing of our employees, customers, and suppliers, while fostering a diverse and inclusive workplace and business environment that ensures fair treatment for all.
- Invest strategically in employee development, empowering them to realise their full potential.
- Create sustainable and inclusive spaces that deliver long-term social value for clients and communities.
- Establish sustainable supply chains by working with our suppliers and, prioritise support for women-owned businesses and SMEs, including those from our start-up incubator.
- Contribute to community development initiatives that benefit society at large while promoting responsible living and fostering healthier lifestyles.
- Ensure ongoing compliance with evolving ESG regulatory standards.
- Maintain consistency, transparency and reliability in measuring and communicating our ESG impacts and expand on our reporting frameworks periodically.
- Foster strong stakeholder relationships to drive ESG initiatives forward.

1 SCOPE & DEFINITIONS

1.5 References

- Our strategy for integrating ESG into our operations is shaped by regulations, frameworks and alliances focused on sustainable development and ESG practices, including those for the real estate sector. We ensure that our operations align with overarching sustainability strategies and initiatives that drive sustainability efforts global and regional efforts, particularly within the UAE.
- We adhere to general principles of sustainability reporting and risk assessment, guided by well-established frameworks. Our strategy is further informed by leading platforms and benchmarks that assess environmental disclosures and ESG performance in real estate. Additionally, our approach is influenced by key international alliances within the real estate sector and we incorporate best practices from globally recognized green building certifications.
- Through the implementation of this Policy, we commit to maintaining alignment with leading sustainability standards and to enhancing our reporting and performance in alignment with the highest industry benchmarks.

2 ESG FRAMEWORK PILLARS, MATERIAL TOPICS & INITIATIVES

To achieve our Policy objectives, we strive to implement initiatives for material topics outlined in our ESG framework. Our ESG framework encompasses 17 material topics categorised under five ESG pillars - Planet, People, Community, Economy, Governance. These material topics signify the areas with the highest and most direct impact in terms of sustaining sustainable operations and maximising performance. We will endeavour to undertake the following efforts to manage each of our material topics.

TECOM GROUP ESG FRAMEWORK

Our vision is to lead the curation of innovative ecosystems that drive sustainable growth and future development.



2 ESG FRAMEWORK PILLARS, MATERIAL TOPICS & INITIATIVES

TECOM Group's ESG approach reflects and supports key UAE strategies, including: UAE Net Zero by 2050 Strategic Initiative, UAE Energy Strategy 2050, UAE Circular Economy Policy 2031-2021, UAE Green Agenda 2030, UAE Gender Balance Council Strategy, UAE In-Country Value (ICV) Programme, Nafis Programme for Emiratisation, UAE Quality of Life Strategy 2033, UAE Agenda for Entrepreneurship and SMEs, Dubai Clean Energy Strategy 2030, Dubai Demand Side Management (DSM) Strategy 205, Dubai Economic Agenda (D33) and Dubai Social Agenda 33.

The framework also ensures alignment with key regulatory requirements including the latest regulation on Climate Change, requiring emissions reporting, decarbonisation efforts and adaptation planning and CSR-related legislation, including regulations on cash and in-kind donations and fundraising. Together, these national strategies and regulatory requirements shape TECOM Group's sustainability direction and inform the priorities embedded within our management approach towards the focus areas.

Our ESG Framework further aligns with the SDGs, supporting global priorities across climate action and societal progress. TECOM Group contributes to SDGs including: SDG 3 Good Health and Wellbeing, SDG 4 Quality Education, SDG 5 Gender Equality, SDG 8 Decent Work and Economic Growth, SDG 9 Industry, Innovation and Infrastructure, SDG 11 Sustainable Cities and Communities, SDG 12 Responsible Consumption and Production, SDG 13 Climate Action, SDG 16 Peace, Justice and Strong Institution and SDG 17 Partnerships for the Goals.

2 ESG FRAMEWORK PILLARS, MATERIAL TOPICS & INITIATIVES

2.1 Pillar – Governance & Risk

This pillar underscores the rigorous management of our business practices, governance procedures, and ethical conduct, serving as the cornerstone of our organisational integrity and sustainability commitment.

- **Material Topic – Ethical Business Policies & Practices**
- We continue to uphold the highest standards of ethical conduct, ensuring compliance with all applicable laws and regulations, and meeting stakeholder expectations.
- We strive to implement and monitor the tenets of our Code of Conduct including Business Ethics, Regulatory Compliance, Market Misconduct, Anti-bribery and Corruption, Anti-competitive Behaviour, Conflict of Interest, Gifts, Responsible Communication, Anti-money Laundering, and Data Protection.
- **Material Topic – Robust Governance**
- We ensure that robust governance forms the cornerstone of our corporate strategy, instilling trust and confidence in our investors and partners, while facilitating long-term growth.
- We establish our ESG Governance framework to integrate sustainability seamlessly into our decision-making process.

2 ESG FRAMEWORK PILLARS, MATERIAL TOPICS & INITIATIVES

- **Material Topic – Prudent Risk Management**
 - We are ensuring that risks are continuously identified, assessed, mitigated, reported, and monitored to safeguard the future of our organisation.
 - We focus on making our portfolio climate resilient.
 - We enhance ESG integration in our Enterprise Risk Management (ERM) Framework.
- **Material Topic – Sustainable Procurement**
 - We manage the impact on our supply chains by incorporating ESG principles into our procurement processes, including prequalification, and collaborate directly with our suppliers to enhance our ESG performance.
 - We strive to integrate local suppliers, women-owned businesses and SMEs, including those from in5, into our supply chain ecosystem to foster their development.

2.2 Pillar – Economy

This pillar supports our economic efforts, embodying our commitment to sustainable growth and resilience.

2 ESG FRAMEWORK PILLARS, MATERIAL TOPICS & INITIATIVES

- **Material Topic – Economic Performance**

- Our Group's Business Plan integrates ESG factors into our strategic objectives.
- We align with global ESG regulatory requirements and best practices, such as SFDR and GRESB assessments, and diligently work towards achieving these objectives in the most effective manner possible.

- **Material Topic – Incubating Innovation**

- We provide support to the companies in our incubation programme, in5, through training, mentorship, and advisory services aimed at enhancing their stability and success.
- We strive to enhance their access to investment and development opportunities, including exposure to our own supply chain ecosystem and subsequently, our business partner networks as well.

- **Material Topic – Customer Centricity**

- We prioritise the needs and aspirations of our business partners by routinely collecting feedback through our Customer Experience (CX) Index, incorporating it into our value proposition, and working towards enhancing our CX.

2 ESG FRAMEWORK PILLARS, MATERIAL TOPICS & INITIATIVES

- By leveraging partner input, we will improve our facilities, services, and value chains, and foster greater collaboration within our network.
- We remain committed to incorporating well-being into our Built-to-Suit business segment and refurbishments, to ensure the provision of healthy and sustainable spaces.

2.3 Pillar - People

This pillar underscores our focus on nurturing our most valuable asset, our people. It embodies our commitment to creating a workplace culture that prioritises employee well-being, growth, and development.

- **Material Topic - Health & Safety**
- We are dedicated to enhancing employee well-being and satisfaction by continually improving our Health & Safety standards and prioritising initiatives for employee inclusion and well-being.
- We ensure that our Health & Safety procedures align with the best available standards such as ISO 45001, conduct routine training, and participate in annual audits.
- We are implementing targeted initiatives and policies to improve employee well-being and ensure a healthy work-life balance.

2 ESG FRAMEWORK PILLARS, MATERIAL TOPICS & INITIATIVES

- **Material Topic - Diversity and Inclusion**

- We continue to establish a culture of inclusion by implementing our Diversity, Equality and Inclusion (DEI) Strategy through initiatives such as blind recruitment processes, non-discriminative promotion opportunities, and paternal leave.

- **Material Topic - Capacity Building**

- We are committed to fostering an innovative and engaging work environment where every employee can reach their full potential.
- We invest in employee training throughout the year, aiming to increase our training hours annually to align with industry best practices.
- We commit to offering career accelerator programs for high-performing employees, provide executive education for our leadership team, and actively work to support youth employment within our networks.

- **Material Topic - Customer Wellbeing**

- We continue to actively invest in enhancing our communities to become more vibrant and sustainable.
- We are committed to providing safe, accessible, and engaging environments that support customer wellbeing and encourage active, community-oriented lifestyles.

2 ESG FRAMEWORK PILLARS, MATERIAL TOPICS & INITIATIVES

2.4 Pillar - Community

This pillar reflects our dedication to actively improving and empowering the communities where we operate.

- **Material Topic - Investing in Local Communities**
- We continue to enhance our communities to support vibrancy and long-term sustainability.
- We are committed to investing in CSR initiatives that yield impact, engage our customers, and contribute to community development.
- We prioritise specific areas where we can generate significant impact, based on local requirements and our business model, and invest in these areas.

2.5 Pillar - Planet

This pillar underscores our unwavering dedication to environmental stewardship, driving initiatives that enhance energy and water efficiency, incorporate renewable energy usage, embed sustainable building principles, promote resource management and circular economy principles, and advance sustainable practices across our operations, aiming to further reduce emissions.

2 ESG FRAMEWORK PILLARS, MATERIAL TOPICS & INITIATIVES

- **Material Topic - Energy Efficiency**

- We reduce the energy intensity of our built portfolio and increase savings, by leveraging innovative technologies and best practices.
- We continue to invest in renewable energy projects in accordance with regulations.
- We support green transportation through provision of Electric Vehicle (EV) chargers.
- We strive to foster a culture of environmental responsibility among our tenants, collaborating closely with them to minimise our collective environmental footprint and advance our shared sustainability goals.

- **Material Topic - Water Efficiency**

- We continue to make efforts towards improving our water efficiency and reducing our water footprint by leveraging water-saving technologies and implementing practices that encourage responsible water management.
- We raise awareness among our stakeholders to support these efforts.

2 ESG FRAMEWORK PILLARS, MATERIAL TOPICS & INITIATIVES

- **Material Topic – Waste Management**

- We strive to enhance resource management, minimise waste and promote circularity within our built portfolio.
- We continue to monitor our waste generation, recycling, and landfill diversion rates, and implement measures to bolster these efforts.
- We work towards collaborating closely with our tenants to optimise waste management practices.

- **Material Topic – Sustainable Buildings**

- We undertake new developments and implement retrofits as per sustainable design, construction, operation, and end-of-life principles.
- We remain steadfast in our commitment to environmental stewardship and actively pursue initiatives to increase the proportion of green buildings within our built portfolio.

2 ESG FRAMEWORK PILLARS, MATERIAL TOPICS & INITIATIVES

- **Material Topic – Reducing GHG Emissions**

- We maintain our commitment to reporting our emissions, periodically refining our calculation methodology for accuracy.
- We continue to make efforts to reduce emissions directly within our control and primarily focus on energy, water, and waste management.
- We extend our emissions reduction impact by collaborating with business partners and suppliers, particularly in segments like Built-to-Suit, to decrease emissions within our sphere of influence over the long term.

2.6 Overview of Enablers

- **Digitalisation**

- Leverage digital solutions to enhance ESG data accuracy, operational efficiency, transparency and sustainability performance.

- **Policies & Procedures**

- Maintain robust ESG policies and procedures that are embedded into governance and business processes.

2 ESG FRAMEWORK PILLARS, MATERIAL TOPICS & INITIATIVES

- **Performance Management**
- Integrate ESG objectives into performance management KPIs to monitor progress, accountability and enable continuous improvement.
- **Awareness & Training**
- Build awareness and capability through regular training and engagement activities.

3 ESG GOVERNANCE & REPORTING

3.1 ESG Governance

- The Policy delineates specific commitments and expectations for our employees and leadership to realise our ESG aspirations. As outlined in Section 3.1.2 Material Topic – Robust Governance, we have established our ESG Governance framework to seamlessly integrate sustainability into our decision-making processes. We will ensure that responsibilities are allocated throughout our organisation in the following manner, to ensure the effective implementation of ESG initiatives.
- **Risk Committee** – At the top of this structure, the Board Risk Committee serves as the primary decision-making body, overseeing ESG implementation by monitoring objectives, strategies, and associated risks.
- **CEO** – The CEO plays a pivotal role in reviewing and guiding ESG strategy and governance, receiving quarterly updates from the ESG Committee to ensure alignment with TECOM Group’s broader objectives.
- **ESG Committee** – The ESG Committee, led by the Senior Vice President of Strategy and Marketing and composed of senior leaders across Engineering, Business Support, Human Capital and Finance, is accountable for ESG implementation and offers essential coordination and strategic recommendations to drive ESG performance.
- **ESG Champions** – Supporting this governance structure, ESG Champions within each department actively work with the ESG Committee to implement initiatives, track progress, and address barriers, fostering an integrated culture of sustainability throughout TECOM Group.

3 ESG GOVERNANCE & REPORTING

- To ensure the effective implementation of ESG initiatives, an ESG Committee Terms of Reference (ToR) will supplement the aforementioned structure. Quarterly and annual objectives, along with associated KPIs for all relevant departments, will be established to assess our ESG impacts across all material topics, and efforts will be made to increase ambition each year. Reporting to the Board against these objectives and associated KPIs will be conducted in accordance with the requirements outlined in the ToR.

3.2 ESG Reporting

- We ensure that all departments collect ESG data and qualitative information on a quarterly basis to track our progress against our objectives, and facilitate annual ESG reporting as per the planned reporting framework/s. We periodically review and update our reporting frameworks in line with market requirements and best practices.

**THANK
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