

# ENVIRONMENT SOCIAL GOVERNANCE

ISS ESG

C+ «Prime»

2024 C «Prime»

SUSTAINALYTICS

Low Risk

2024 Low Risk

MSCI

AAA

2024 AAA  
(Scale: AAA to CCC)

inrate

B+

2024 B+  
(scale A+ to D-)

PRI Principles for Responsible Investment

4 stars

Policy, governance and strategy

2024 4/5 stars

4 stars

Real estate

2024 4/5 stars

5 stars

Confidence-building measures

2024 5/5 stars

We are committed to the responsible, value-oriented management and supervision of the Company. By implementing integrated risk management and sustainable procurement, we ensure that our business practices remain ethical, transparent and responsible in the long term.

## Our material topics

- Sustainable procurement and supply chain
- Responsible corporate governance
- Integrated risk management

# How we ensure responsible executive management

## **Risk awareness as the foundation of a strong risk culture**

A robust risk culture is the basis for effective risk management. Risks are identified at an early stage, taken into account in decisions and communicated openly. This strengthens our shared understanding of risk.

Swiss Prime Site promotes this culture through targeted measures. These include risk awareness training (e.g. third-party management, information security, compliance), cross-divisional workshops for risk identification, and the integration of the risk function into strategic and operational processes. The integrated risk management system is embedded in our corporate strategy and culture and goes beyond traditional control instruments. It enables the systematic assessment and management of risks in conjunction with opportunities, thus strengthening the Company's resilience and sustainable success.

## **Strengthening our organisational resilience**

Given the increasing complexity and dynamism of the global environment, resilience is a key success factor. Resilience also includes adaptability, clear decision-making and the ability to act under pressure.

In the reporting year, we actively strengthened our resilience by strategically developing our Business Continuity Management (BCM). The focus was on a group-wide crisis simulation with external specialist support. We used this simulation to test both our ability to respond to complex crisis situations and our cross-divisional collaboration.

The insights gained were fed directly into the further development of the BCM documentation. This enabled us to expand and optimise our crisis management in a targeted manner.

## **Updating our system of directives**

In the reporting year, we specified our due diligence obligations in more detail, particularly with regard to child labour and conflict minerals. In this context, we revised our Code of Conduct, the Supplier Code of Conduct and the Environmental Policy Concept. In keeping with these guidelines, we have now implemented new processes for embedding, analysing, monitoring and complaint management and reviewed the governance structures.

With the closure of the Jelmoli department store at the start of 2025, Swiss Prime Site completed its strategic repositioning and is now focusing entirely on its core area of real estate. In view of this, the group-wide system of «SPS directives» was updated.

## **Regular specific training sessions on information security and data protection**

During the reporting year, important topics were addressed in the training sessions: IT phishing, communication and negotiating skills.

### Effectiveness audit in the reporting year

- No known cases of non-compliance with laws and/or official regulations (no fines or sanctions imposed on the Company or its employees)
- No legal actions for anti-competitive behaviour, anti-trust or monopoly practices known.
- No breaches of data security or data protection ascertained. No unauthorised access, data loss, data leaks or other security-related incidents have come to light that would have necessitated reporting to supervisory authorities or data subjects. There have also been no complaints or investigations by data protection authorities.
- There are no indications of bribery, the granting of advantages or other improper influence in violation of internal guidelines or applicable statutory provisions. Similarly, no investigations have been initiated or conducted by law enforcement or supervisory authorities in connection with suspected corruption.
- No legal action due to non-compliance with environmental laws and regulations known. There were no official investigations, sanctions or other measures that might have indicated non-compliance with environmental regulations (e.g. in the area of emissions, waste disposal, water protection or energy consumption). To the best of our knowledge, all relevant requirements have been met.

### **Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (CO Art. 964 j–k)**

- There is no evidence that minerals or metals from conflict areas are being imported or processed or that any quantities specified in the Ordinance are being exceeded.
- There have been no indications pointing to risks of serious impact on human rights in our activities or in our environment. No suspicions of child labour.
- Based on the Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour, we are therefore exempt from the corresponding due diligence and reporting obligations of Switzerland and the EU.