



TCFD Alignment Report

Real Estate | 2023

ECE Progressive Income Growth Fund

ECE Real Estate Partners

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The TCFD Alignment Level is an indication of an entity's efforts in addressing climate-related risks in line with the processes outlined by the TCFD. It can be interpreted as a high-level reference to the entity's position along its TCFD journey. For more information, please refer to the [TCFD Alignment Level](#) section in the Introduction.

Entity Details

Status Non-listed	Location Europe	Property Type Retail: Retail Centers: Shopping Center
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TCFD Alignment Level

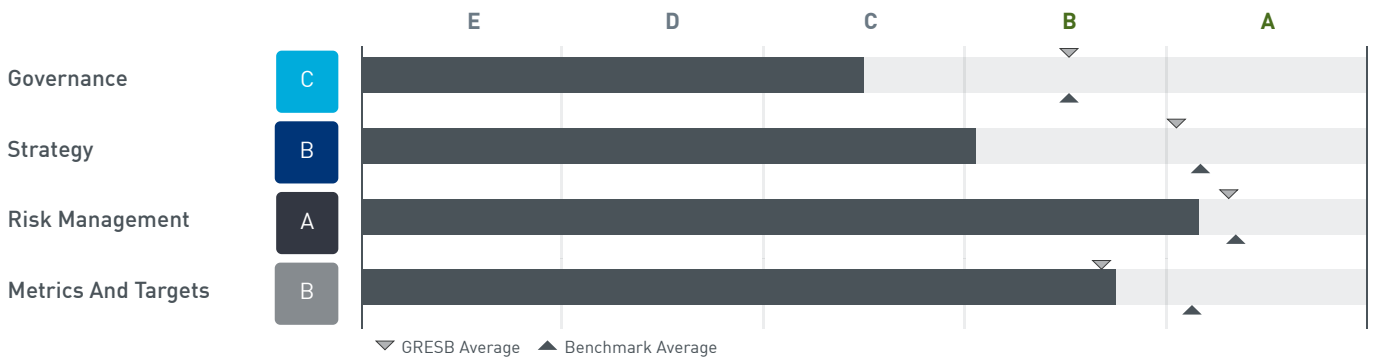


Benchmark Group

Status Core	Location Europe	Property Type Retail: Retail Centers: Shopping Center
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Core Element Alignment

This section provides a breakdown of the alignment of the entity with each of the four Core Elements of the TCFD, as well as the corresponding benchmarks. The Benchmark Average is based on the same peer group as for the GRESB Benchmark Reports. The GRESB Average refers to the average alignment of Participants within the same Assessment universe (Real Estate, Infrastructure Fund, Infrastructure Asset). For more detail on the distribution of the benchmarks, please refer to the [Core Element Alignment Breakdown](#).



Introduction ^

TCFD

The Task Force on Climate-related Financial Disclosures (TCFD) was originally formed to develop a voluntary framework designed to facilitate the clear, consistent, and relevant disclosure of climate-related information in organizations' financial reporting. Since the publication of its [Final Report](#) in 2017, the TCFD has become the de facto standard for how to report on climate-related issues, and its framework for disclosure has become a roadmap for how organizations should set up their internal climate-related processes to best identify, assess, and manage the range of climate-related issues that organizations are exposed to today.

The TCFD has grown rapidly, with an increasing number of organizations pledging support for the recommendations. However, as illustrated by the TCFD's [2023 Status Report](#), while the percentage of companies disclosing TCFD-aligned information continues to grow, "more progress is needed". For fiscal year 2022 reporting, 58% of companies disclosed in line with at least five of the 11 recommended disclosures—up from 18% in 2020; Only 4% disclosed in line with all 11. For materials and buildings companies, the second most advanced sector in terms of TCFD-aligned disclosure (the first is energy companies), companies reported on average of 5.8 of the 11 recommended disclosures. With the wide range of guidance on how to report in line with the TCFD, it can still be challenging to address each recommended disclosure for a particular reporting entity.

Furthermore, although the TCFD recommendations serve as the basis for an increasing number of mandatory reporting requirements, navigating these requirements still proves challenging. Each jurisdiction has its own interpretation of the TCFD recommendations as applicable to its own set of stakeholders, issuers, and audiences.

The issuance of IFRS S2 Climate-related Disclosures

In June 2023, ISSB issued its inaugural sustainability standards. This includes [International Financial Reporting Standards \(IFRS\) S1 & S2](#). While IFRS S1 provides the disclosure requirements for sustainability-related risks and opportunities, IFRS S2 provides the requirements for climate-related disclosures and works in conjunction with IFRS S1. Both IFRS S1 and S2 integrate and are consistent with the TCFD. The TCFD Recommendations can still be used by companies. The International Sustainability Standards Board (ISSB) will take over TCFD monitoring as of July 2024. This was previously done by the Financial Stability Board (FSB).

GRESB TCFD Alignment Report

The Alignment Report draws from information provided in the GRESB Assessment and compares this with TCFD requirements to identify alignment opportunities, providing a basis for the entity's own TCFD reporting efforts. Developed as a tool for GRESB Participants, the Alignment Report serves a variety of functions:

1. **Gap analysis:** It identifies areas of the TCFD that a Participant could further explore and implement;
2. **Benchmarking:** It compares an entity's TCFD alignment with that of its peer group;
3. **Engagement:** It illustrates to investors an entity's ability to report in line with TCFD, and the coverage of their climate-related risk processes in general, as well as their progress year-on-year.

TCFD Alignment Level

The Alignment Report results are summarized in an Alignment Level. Alignment is determined by the reported existence of leadership structures, risks and other climate-related processes that relate to the four TCFD pillars. The Alignment Level is not an indication of the quality of the entity's own TCFD reporting efforts or internal climate-related risk processes. Additionally, if an entity has made additional efforts to align with TCFD recommendations but has not reported these to the GRESB Assessment, this is naturally not reflected in GRESB's identified TCFD alignment report.

The TCFD Alignment Levels are graded as follows:

- A. Maximum alignment
- B. Advanced alignment
- C. Intermediate alignment
- D. Beginner alignment
- E. Minimal alignment

Maximum alignment indicates the highest level of alignment that GRESB can facilitate through its Assessments. While this assesses whether an entity has successfully reported against each of the 11 TCFD recommended disclosures, a maximum score doesn't mean that more couldn't be done to increase the quality of those disclosures.

The overall TCFD Alignment Level is the aggregate of the equally weighted 'scores' reflecting alignment to each of the 11 recommended disclosures of the TCFD.

Recommendations and Supporting Recommended Disclosures

Governance	Strategy	Risk Management	Metrics and Targets
<p>Disclose the organization's governance around climate-related risks and opportunities.</p>	<p>Disclose the actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning where such information is material.</p>	<p>Disclose how the organization identifies, assesses, and manages climate-related risks.</p>	<p>Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material.</p>
Recommended Disclosures	Recommended Disclosures	Recommended Disclosures	Recommended Disclosures
<p>a) Describe the board's oversight of climate-related risks and opportunities.</p>	<p>a) Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.</p>	<p>a) Describe the organization's processes for identifying and assessing climate-related risks.</p>	<p>a) Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.</p>
<p>b) Describe management's role in assessing and managing climate-related risks and opportunities.</p>	<p>b) Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.</p>	<p>b) Describe the organization's processes for managing climate-related risks.</p>	<p>b) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.</p>
	<p>c) Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.</p>	<p>c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.</p>	<p>c) Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.</p>

Source: After TCFD (2017)

The scores of each of the recommended disclosures are also aggregated into respective Core Element Alignment Levels to provide a thematic breakdown of alignment to TCFD processes (i.e. for each of the Governance, Strategy, Risk Management and Metrics & Targets).

This is aligned with the AI Review Methodology used by the TCFD in its [2021 Status Report](#). As in the AI Review Methodology, the Alignment Level methodology is not designed to assess the quality of a company's climate-related financial disclosures, but rather to provide an indication of the alignment of existing disclosures with the TCFD's 11 recommended disclosures. For more information, please refer to the [GRESB TCFD Alignment Methodology](#) document.

Guidance per TCFD Recommended Disclosure

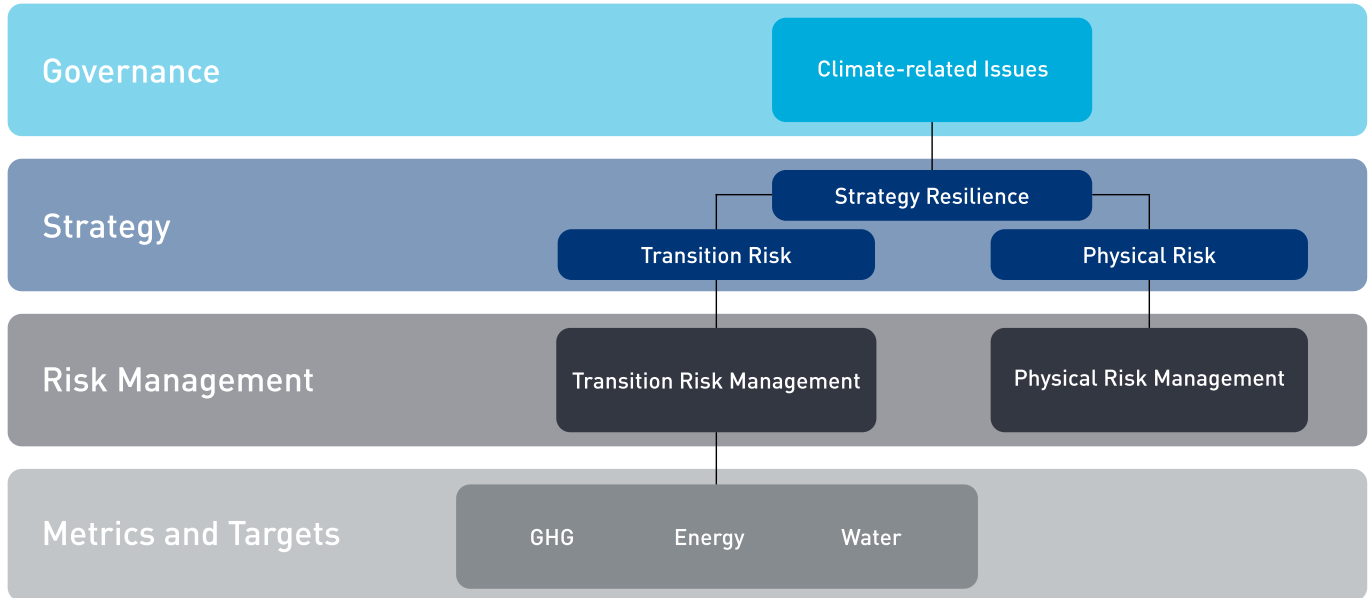
For each of the TCFD's 11 recommended disclosures, GRESB provides guidance on how responses to the GRESB Assessments can (or should not) be interpreted in light of TCFD-aligned reporting, based on the considerations included in the TCFD's Implementing the Recommendations of the Task Force on Climate-related Financial Disclosures report.

In light of the publication of IFRS S2 Climate-related Disclosures by ISSB, as well as the ISSB's new stewardship of TCFD monitoring, GRESB has included guidance regarding the areas where IFRS S2 differs from the TCFD for each recommended disclosure. This enables GRESB participants to identify, at a glance, the additional and/or differing information in comparison to TCFD, that they would need to collect and report to meet IFRS S2 requirements in the future. The language for this is reproduced from the [document](#) prepared by the staff of the IFRS Foundation on the comparison of IFRS S2 Climate-related Disclosures with the TCFD Recommendations.¹¹

Areas where IFRS S2 differs from the TCFD recommendations reflect differences between IFRS S2 and the TCFD's guidance, not the TCFD's core recommendations or recommended disclosures. These differences take three forms. Specifically, IFRS S2 ([Comparison IFRS S2 Climate-related Disclosures with the TCFD Recommendations](#), July 2023)

- uses **different wording** to capture the same information as the TCFD recommendations. In other words, in these cases, the requirements in IFRS S2 are described as being broadly consistent with the TCFD recommendations;
- requires **more detailed** information that is in line with the TCFD recommendations; and
- **differs** from the TCFD guidance—but not from the TCFD overall recommendations—mainly by providing some **additional** requirements and guidance

1. Disclaimer from ISSB: This document was prepared by the staff of the IFRS Foundation for the convenience of interested parties. The views expressed in this document are those of the staff who prepared it and are not necessarily the views or the opinions of the International Sustainability



Additional Context

However, climate-related opportunities are important for comprehensive climate-related disclosure and may be addressed in future iterations of the Alignment Report.

The TCFD generally refers to ‘climate-related’ issues at the level of the recommended disclosures, while the Alignment Report also provides a breakdown by the two major climate-related risk categories: transition risk and physical risk, adding helpful additional granularity that is critical to the holistic risk management of an entity.

The schematic above illustrates the scope at which each of the four TCFD Core Elements is addressed. In the Governance element, climate-related issues (risks and opportunities) are generally addressed holistically.

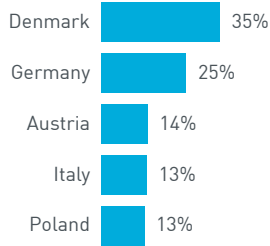
In the Strategy element, while organizational strategy may be established with regard to climate-related issues and resilience in general, scenario analysis is most effectively done with particular regard to the type and nature of risk at hand; thus, the separate treatment of transition and physical risk scenario analysis. As with scenario analysis, the Risk Management element is addressed according to the risk type (transition or physical), as the expertise, modeling, prioritization, and management of risks can differ greatly between transition and physical risks. Finally, GRESB does not currently address particular physical risk metrics. Thus, the data used for metrics and targets is constrained to that which would be useful in the monitoring and tracking of transition risks.

Portfolio Overview

Gross asset value (GAV)

USD 1.81 Billion

Country breakdown based on GAV



Property type breakdown based on GAV



Core Element Alignment Breakdown

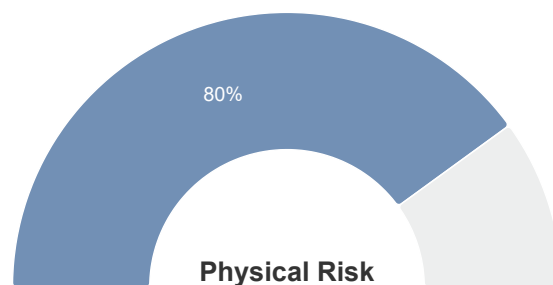
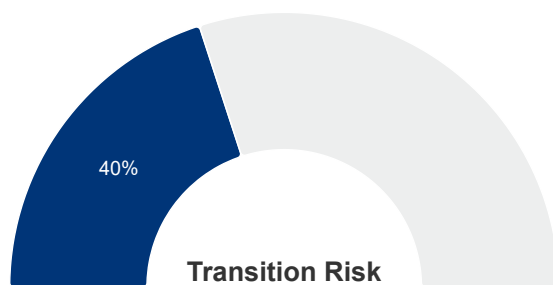
Similarly to the [Core Element Alignment](#) section on the scorecard page, this section provides a breakdown of the alignment of the entity with each of the four Core Elements of the TCFD, as well as the corresponding benchmarks. However, this table provides the numerical alignment scores, as well as the distribution of scores within the corresponding benchmark peer groups.

Core Element	Alignment Level	Obtained Score	Benchmark Average	GRESB Average	Benchmark Distribution
Governance	C	10/20	14	14	
Strategy	B	18/30	25	24	
Risk Management	A	25/30	26	26	
Metrics and Targets	B	23/30	24	22	

◆ Benchmark ● This Entity □ GRESB Universe

Climate-related Risk Process Focus

This section provides a high-level indication of the relative attention given to transition and physical risks. These meters are informed by the existence and coverage of risk identification and impact assessment processes dedicated to the two risk types. Some asset managers might tackle physical climate risks first, others transition risks. A large discrepancy between meter ratings could be indicative of a manager's position at the beginning of their climate-related risk management journey, or might warrant additional examination. It is important to understand the risk management priorities of an entity. For more information on the construction of these meters, please refer to the [GRESB TCFD Alignment Methodology](#) document.



Recommended Disclosure Alignment

Core Element	Recommended Disclosure		Benchmark Comparison	Entity Alignment
Governance	Board Oversight	Entity		0/10
		Benchmark		
Governance	Management's Role	Entity		10/10
		Benchmark		
Strategy	Risks and Opportunities	Entity		10/10
		Benchmark		
	Impact on Organization	Entity		5/10
Benchmark				
Strategy	Resilience of Strategy	Entity		3/10
		Benchmark		
Risk Management	Risk ID and Assessment Process	Entity		10/10
		Benchmark		
	Risk Management Process	Entity		10/10
Benchmark				
Risk Management	Integration into Overall Risk Management	Entity		5/10
		Benchmark		
Metrics and Targets	Climate-related Metrics	Entity		8/10
		Benchmark		
	Scope 1, 2, and 3 GHG Emissions	Entity		4/10
Benchmark				
Metrics and Targets	Climate-related Targets	Entity		10/10
		Benchmark		

Guidance per TCFD Recommended Disclosure

For each of the TCFD's 11 recommended disclosures, GRESB provides guidance on how responses to the GRESB Assessments can (or should not) be interpreted in light of TCFD-aligned reporting.

This GRESB guidance is not entity-specific. That is, the guidance is not customized to the responses of the particular entity, but rather is based on the structure and content of the Assessment indicators themselves.

In addition, entities can see a summary view of where IFRS S2 requires additional and/or differing information in comparison to the TCFD guidance for each of the 11 recommended disclosures.

Recommended Disclosure (a)

Description	GRESB Assessment Indicators	Alignment
Describe the board’s oversight of climate-related risks and opportunities.	LE5: ESG, climate-related and/or DEI senior decision maker	0/10

Guidance

The GRESB Real Estate Assessment addresses this recommended disclosure by asking about the existence of the senior decision-maker on climate-related risks and opportunities on the entity’s Board of Directors.

GRESB Assessment ESG and/or climate-related senior decision maker indicator (LE5) provides the details for the most senior decision-maker on climate-related issues, including if said individual sits on the Board of Directors. While details on the process and responsibilities of the individual (and the Board of Directors) are not addressed explicitly, descriptions of the process of informing the most senior decision-maker on climate-related issues may be described in the open text box.

TCFD Guidance for All Sectors	GRESB Guidance
Processes and frequency by which the board and/or board committees (e.g., audit, risk, or other committees) are informed about climate-related issues.	Not explicitly addressed in the GRESB Assessment. However, the open text box of the ESG and/or climate-related senior decision-maker indicator (LE5) asks for a description of the process of informing the most senior decision-maker on the ESG performance of the entity. This includes means of communication and frequency of reporting. These processes may also pertain to climate-related issues.
Whether the board and/or board committees consider climate-related issues when reviewing and guiding strategy, major plans of action, risk management policies, annual budgets, and business plans as well as setting the organization’s performance objectives, monitoring implementation and performance, and overseeing major capital expenditures, acquisitions, and divestitures.	Not explicitly addressed in the GRESB Assessment. However, the open text box of the ESG and/or climate-related senior decision-maker indicator (LE5) asks for a description of the process of informing the most senior decision-maker on the ESG performance of the entity. This includes contents of reporting for which examples can include, but are not limited to: (i) an overview of asset performance (quantitative), (ii) realized ESG performance against objectives, (iii) updates regarding long-term strategic objectives, (iv) updates/notifications regarding regulatory changes or (v) updates regarding proposed actions to improve the performance of the assets. This content of reporting may also pertain to climate-related issues.
How the board monitors and oversees progress against goals and targets for addressing climate-related issues.	Not explicitly addressed in the GRESB Assessment. However, the open text box of the ESG and/or climate-related senior decision-maker indicator (LE5) asks for a description of the process of informing the most senior decision-maker on the ESG performance of the entity. This includes contents of reporting for which examples can include, but are not limited to: (i) an overview of asset performance (quantitative), (ii) realized ESG performance against objectives. This content of reporting may also pertain to climate-related issues.

IFRS S2 Climate-related Disclosures

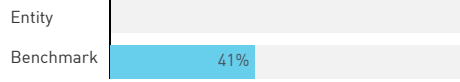
IFRS S2 is broadly consistent with the TCFD Recommended Disclosure a).

IFRS S2 requires the disclosure of **more detailed information**, for example, how the governance body(s) or individual(s) responsibilities for climate-related risks and opportunities are reflected in the terms of reference, mandates, role descriptions and other related policies applicable to that body(s) or individual(s).

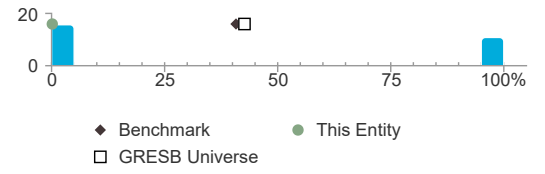
Scores

Scores

Score Comparison



Benchmark Distribution



Recommended Disclosure (b)

Description	GRESB Assessment Indicators	Alignment
Describe management’s role in assessing and managing climate-related risks and opportunities.	LE3: Individual responsible for ESG, climate-related, and/or DEI objectives LE5: ESG, climate-related and/or DEI senior decision maker	10/10

Guidance

The GRESB Real Estate Assessment addresses this recommended disclosure by asking about the existence of a senior decision-maker accountable for climate-related issues and the existence of one or more persons responsible for implementing climate-related objectives.

TCFD Guidance for All Sectors	GRESB Guidance
Whether the organization has assigned climate-related responsibilities to management-level positions or committees; and, if so, whether such management positions or committees report to the board or a committee of the board and whether those responsibilities include assessing and/or managing climate-related issues.	GRESB Assessment ESG and/or climate-related senior decision-maker indicator (LE5) provides the details for the most senior decision-maker on climate-related issues, including if said individual sits on the Board of Directors.
A description of the associated organizational structure(s).	Addressed in GRESB Assessment Individual responsible for ESG and/or climate-related objectives indicator (LE3) . This description may include details on the one or more persons responsible for implementing climate-related objectives, including whether the persons responsible include dedicated employee(s) for whom climate-related issues are core responsibilities, employee(s) for whom climate-related issues are among their responsibilities, external consultants/manager, and/or investment partners (co-investors/JV partners).
Processes by which management is informed about climate-related issues.	Not explicitly addressed in the GRESB Assessments. However, descriptions of the process of informing the most senior decision-maker on climate-related issues may be described in the open text box of ESG and/or climate-related senior decision-maker indicator (LE5) . The content of this reporting may also pertain to climate-related issues.
How management (through specific positions and/or management committees) monitors climate-related issues.	While the monitoring process is not explicitly addressed in the GRESB Assessments, the existence of specific positions is, as above, described in Individual responsible for ESG and/or climate-related objectives indicator (LE3) and ESG and/or climate-related senior decision-maker indicator (LE5)

IFRS S2 Climate-related Disclosures

IFRS S2 is broadly consistent with the TCFD Recommended Disclosure b)

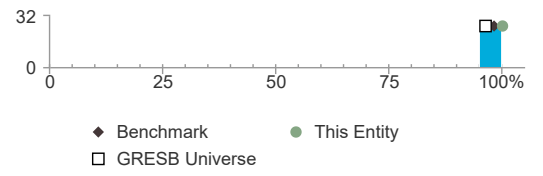
Scores

Scores

Score Comparison



Benchmark Distribution



Recommended Disclosure (a)

Description	GRESB Assessment Indicators	Alignment
Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	RM6.1: Transition risk identification RM6.3: Physical risk identification	10/10

Guidance

The GRESB Real Estate Assessment addresses this recommended disclosure by asking about the existence of systematic processes for identifying transition and physical risks that could have a material financial impact on the entity.

TCFD Guidance for All Sectors	GRESB Guidance
A description of what they consider to be the relevant short-, medium-, and long-term time horizons, taking into consideration the useful life of the organization’s assets or infrastructure and the fact that climate-related issues often manifest themselves over the medium and longer terms.	Not explicitly addressed in the GRESB Assessment.
A description of the specific climate-related issues for each time horizon (short, medium, and long term) that could have a material financial impact on the organization.	Addressed in GRESB Assessment Transition Risk Identification (RM6.1) and Physical Risk Identification (RM.6.3) indicators. Risks identified here can be disclosed in TCFD reporting and should be mapped onto the entity’s definitions of short-, medium-, and long-term time horizons. Alignment here references the existence of a systematic risk identification process rather than the number or type of risks identified. The identification of more risks in the GRESB Assessment could mean that the entity is exposed to a large number of risks and/or that the risk identification processes of the entity are more sensitive (more likely to identify a potential material risk if such a risk indeed exists). Conversely, fewer identified risks here could mean that the entity is exposed to fewer risks and/or that the risk identification processes of the entity are less sensitive (less likely to identify a potential material risk if such a risk indeed exists). Regardless, the individual risks should still be disclosed if they have the potential to be materially relevant.
A description of the process(es) used to determine which risks and opportunities could have a material financial impact on the organization.	Addressed in GRESB Assessment Transition Risk Identification (RM6.1) and Physical Risk Identification (RM.6.3) indicators. Users may consider the scope of the risk identification processes (“Select the elements covered in the risk identification process (multiple answers possible)”). If a particular element (e.g., reputational risks, acute physical risks) is not covered, then necessarily, no risks (real or not) are able to be identified in that category. It is important that various risk categories be scoped out, even if no potentially material risks are identified during the execution of the process.
Organizations should consider providing a description of their risks and opportunities by sector and/or geography, as appropriate.	Not explicitly addressed in GRESB Assessment.
In describing climate-related issues, organizations should refer to Tables A1.1 and A1.2 (pp. 75–76) .	The GRESB Assessments refer to climate-related risks outlined in Table 1.

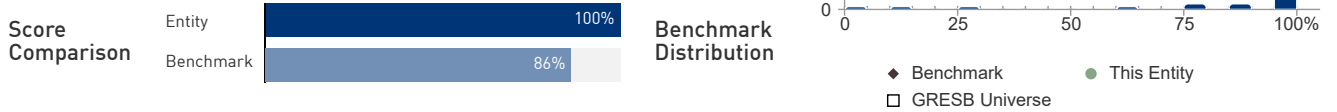
IFRS S2 Climate-related Disclosures

IFRS S2 is broadly consistent with the TCFD Recommended Disclosure a).

IFRS S2 additionally requires a company to refer to and consider the applicability of industry-based disclosure topics in the industry-based guidance in identifying climate-related risks and opportunities.

IFRS S2 also requires disclosure of more detailed information around where in the company's business model and value chain risks and opportunities are concentrated.

Scores



Recommended Disclosure (b)

Description	GRESB Assessment Indicators	Alignment
Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.	RM5: Resilience of strategy to climate-related risks RM6.1: Transition risk identification RM6.2: Transition risk impact assessment RM6.3: Physical risk identification RM6.4: Physical risk impact assessment	5/10

Guidance

The GRESB Real Estate Assessment addresses this recommended disclosure by asking about the existence of systematic processes to assess the material financial impact of transition and physical risks on the business and/or financial planning of the entity.

TCFD Guidance for All Sectors	GRESB Guidance
Building on recommended disclosure (a), organizations should discuss how identified climate-related issues have affected their businesses, strategy, and financial planning.	Addressed in GRESB Assessment Transition Risk Impact Assessment (RM.6.2) and Physical Risk Impact Assessment (RM.6.4) indicators. Impacts described here can be disclosed in TCFD reporting. An identified risk need not already have affected the business to affect the strategy or financial planning of an entity.
Organizations should consider including the impact on their businesses, strategy, and financial planning in the following areas: <ul style="list-style-type: none"> • Products and services • Supply chain and/or value chain • Adaptation and mitigation activities • Investment in research and development • Operations (including types of operations and location of facilities) • Acquisitions or divestments • Access to capital 	GRESB Assessment Transition Risk Impact Assessment (RM.6.2) and Physical Risk Impact Assessment (RM.6.4) indicators uses the language outlined in Table 1 of the TCFD's Final Recommendations, and as such, span these areas.
Organizations should describe how climate-related issues serve as an input to their financial planning process, the time period(s) used, and how these risks and opportunities are prioritized.	How identified risks are prioritized is covered in the open text boxes of GRESB Assessment indicators Transition Risk Identification (RM.6.1) and Physical Risk Identification (RM.6.3). If the process for risk prioritization in the context of financial planning is different than the process for risk prioritization elsewhere, this should be noted.
Organizations' disclosures should reflect a holistic picture of the interdependencies among the factors that affect their ability to create value over time.	Not explicitly addressed in GRESB Assessment.
Organizations should describe the impact of climate-related issues on their financial performance (e.g., revenues, costs) and financial position (e.g., assets, liabilities).	GRESB Assessment Transition Risk Impact Assessment (RM.6.2) and Physical Risk Impact Assessment (RM.6.4) indicators use the language outlined in Table 1 of the TCFD's Final Report , and as such, span a range of financial performance and financial position impacts qualitatively. These impacts should then be translated into quantitative metrics and aggregated into higher-level metrics (e.g., revenues, costs, assets, liabilities).
If climate-related scenarios were used to inform the organization's strategy and financial planning, such scenarios should be described.	The scenarios used in the process to inform the organization's strategy in the context of resilience building are listed in GRESB Assessment indicator Resilience of strategy to climate-related risks (RM5).

TCFD Guidance for All Sectors

Organizations that have made GHG emissions reduction commitments, operate in jurisdictions that have made such commitments, or have agreed to meet investor expectations regarding GHG emissions reductions should describe their plans for transitioning to a low-carbon economy, which could include GHG emissions targets and specific activities intended to reduce GHG emissions in their operations and value chain or to otherwise support the transition.

GRESB Guidance

While plans for transitioning to a low-carbon economy are not explicitly addressed in the GRESB Assessment, various elements underlying effective transition plans are. GHG reduction targets can be found in Targets indicator [T1.1](#).

As a starting point, entities may describe which of the 11 recommended disclosures are addressed in the governance, strategy, management, monitoring, and target setting of a transition plan (as opposed to only being addressed in the context of risks and opportunities). For more guidance, see the TCFD's [Guidance on Metrics, Targets, and Transition Plans](#) (2021).

IFRS S2 Climate-related Disclosures

IFRS S2 is broadly consistent with the Recommended Disclosure b).

In describing the effects of climate-related risks and opportunities, IFRS S2 requires more detailed information. For example, in disclosing how a company has responded to, and plans to respond to, the identified risks and opportunities, the company is required to disclose any transition plans it has and how the company plans to achieve its climate-related targets.

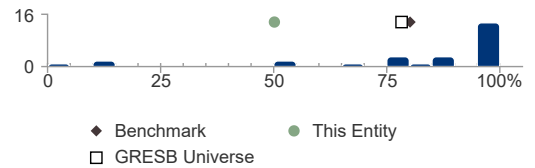
In providing disclosures about the current and anticipated effects of the risks and opportunities on a company's financial position, financial performance and cash flows, IFRS S2 sets out criteria for when quantitative and qualitative information is required. Disclosure of only qualitative information is permitted under some circumstances, for example, when a company cannot separately identify the effects of the risk or opportunity or when the level of measurement uncertainty involved is too high.

When preparing disclosures on the anticipated financial effects, IFRS S2 requires a company to use all reasonable and supportable information that is available at the reporting date without undue cost or effort and requires the use of an approach that is commensurate with the company's circumstances.

Scores



Benchmark Distribution



Recommended Disclosure (c)

Description	GRESB Assessment Indicators	Alignment
Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	RM5: Resilience of strategy to climate-related risks	3/10

Guidance

The GRESB Real Estate Assessment addresses this recommended disclosure by asking about the existence of a strategy that incorporates resilience to climate-related risks, as well as the use of both low-carbon transition and physical climate risk scenarios in the development of strategy resilience.

TCFD Guidance for All Sectors	GRESB Guidance
<p>Organizations should describe how resilient their strategies are to climate-related risks and opportunities, taking into consideration a transition to a low-carbon economy consistent with a 2°C or lower scenario and, where relevant to the organization, scenarios consistent with increased physical climate-related risks.</p>	<p>Addressed in GRESB Assessment indicator Resilience of strategy to climate-related risks (RM5). Note that due to the complexity involved in describing the resilience of a strategy, this indicator is not validated. A description of the strategy itself is insufficient. The description should provide a relative status of the resilience of the strategy – e.g., completely resilient, resilient to policy and legal risks as estimated by carbon pricing scenario X, resilient to a suite of physical risk factors modeled under Representative Concentration Pathway 8.5 (RCP8.5), etc.</p> <p>The entity's definition of resilience should be provided.</p> <p>Neither the GRESB Assessment nor this report makes a judgment as to the type or number of scenarios used in an entity's strategy development. One scenario can be used very well, or many scenarios can be used superficially. Furthermore, representative (widely used and understood) scenarios like those provided as indicator selection options may be used to clearly represent an entity's planning and performance, or custom scenarios may be preferred in an attempt to better reflect the local jurisdictions or markets affecting the entity. However, if custom scenarios are used in addition to or in lieu of those provided, an explanation as to why the use of custom scenarios was chosen should be provided, and whether those custom scenarios were informed by other published scenarios.</p> <p>As many jurisdictions aim for 1.5°C or Net Zero goals, it might be appropriate to use similarly aggressive scenarios, not just 2°C scenarios, in the entity's resilience exercises.</p> <p>Similarly, for "scenarios consistent with increased physical climate-related risks," many entities choose to use a risk projection corresponding to climate modeling using (at the very least) RCP8.5. As the IPCC begins to use the Shared Socioeconomic Pathways (SSPs), it is important not to conflate these with the RCPs. These sets of pathways are complementary, but are not meant to supersede the RCPs.</p>

TCFD Guidance for All Sectors

Organizations should consider discussing:

- where they believe their strategies may be affected by climate-related risks and opportunities;
- how their strategies might change to address such potential risks and opportunities;
- the potential impact of climate-related issues on financial performance (e.g., revenues, costs) and financial position (e.g., assets, liabilities); and
- the climate-related scenarios and associated time horizon(s) considered.

GRESB Guidance

GRESB Assessment Transition Risk Impact Assessment (RM.6.2) and Physical Risk Impact Assessment (RM.6.4) indicators the language outlined in Table 1 of the TCFD's [Final Report](#), and as such, span a range of financial performance and financial position impacts qualitatively. These impacts should then be translated into quantitative metrics and aggregated into higher-level metrics (e.g., revenues, costs, assets, liabilities).

Refer to Section D in the [Task Force's](#) report for information on applying scenarios to forward-looking analysis.

IFRS S2 Climate-related Disclosures

IFRS S2 is broadly consistent with the TCFD Recommended Disclosure c). However, IFRS S2 does not specify the particular scenarios that a company would be required to use in its climate-related scenario analysis.

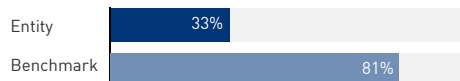
IFRS S2 requires additional information regarding resiliency on:

- significant areas of uncertainty considered by the company in its assessment;
- a company's capacity to adjust and adapt its strategy and business model over time; and
- details on how and when the climate-related scenario analysis was carried out.

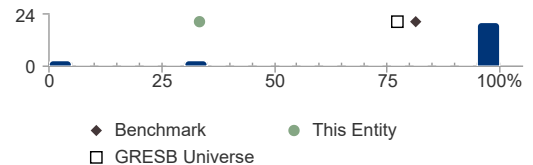
In using climate-related scenario analysis, IFRS S2 requires the use of an approach that is commensurate with the company's circumstances and a consideration of all reasonable and supportable information that is available at the reporting date without undue cost or effort.

Scores

Score Comparison



Benchmark Distribution



Recommended Disclosure (a)

Description	GRESB Assessment Indicators	Alignment
Describe the organization's processes for identifying and assessing climate-related risks.	RM6.1: Transition risk identification RM6.2: Transition risk impact assessment RM6.3: Physical risk identification RM6.4: Physical risk impact assessment	10/10

Guidance

The GRESB Real Estate Assessment addresses this recommended disclosure by asking about the scope, flow, and prioritization characteristics of the entity's systematic climate-related risk identification and impact assessment processes.

TCFD Guidance for All Sectors	GRESB Guidance
<p>Organizations should describe their risk management processes for identifying and assessing climate-related risks. An important aspect of this description is how organizations determine the relative significance of climate-related risks in relation to other risks.</p>	<p>By completing Transition Risk Identification (RM6.1), Transition Risk Impact Assessment (RM6.2), Physical Risk Identification (RM6.3), and Physical Risk Impact Assessment (RM6.4), this highlights that processes have been undertaken to scan the various climate-related risks. While potential material risks may not be identified in a particular risk category, it is best practice to consider each risk category and have a process attuned to identifying risks therein. It is also important that if risks are identified in an entity's risk identification process, that the impact of these risks are subsequently assessed.</p> <p>Furthermore, the open text boxes included in GRESB Assessment Transition Risk Identification (RM6.1) and Physical Risk Identification (RM6.3) indicators are meant to provide a description of the entity's process for prioritizing transition risks and a description of how materiality determinations are made for such risks. Such descriptions should make clear the processes, thresholds, or judgements that lead to risks being identified or carried on for further impact assessment. Particularly, the open text boxes in the Transition Risk Identification (RM6.1) and Physical Risk Identification (RM6.3) indicators are important in the interpretation of what it means for risks to have been identified in those indicators, respectively.</p>
<p>Organizations should describe whether they consider existing and emerging regulatory requirements related to climate change (e.g., limits on emissions) as well as other relevant factors considered.</p>	<p>There is a specific focus on existing and emerging regulatory requirements within the umbrella of transition risks. These refer to the issues under Policy and Legal category. Organizations need not necessarily identify risks in this area. However, they should ensure that this area is addressed in their risk identification process, as indicated in Transition Risk Identification (RM6.1). Similarly, should the entity identify risks during its risk identification process, the impact of these risks should be subsequently assessed.</p>
<p>Organizations should also consider disclosing the following:</p> <ul style="list-style-type: none"> processes for assessing the potential size and scope of identified climate-related risks and definitions of risk terminology used or references to existing risk classification frameworks used. 	<p>Not explicitly addressed in GRESB Assessment.</p>

IFRS S2 Climate-related Disclosures

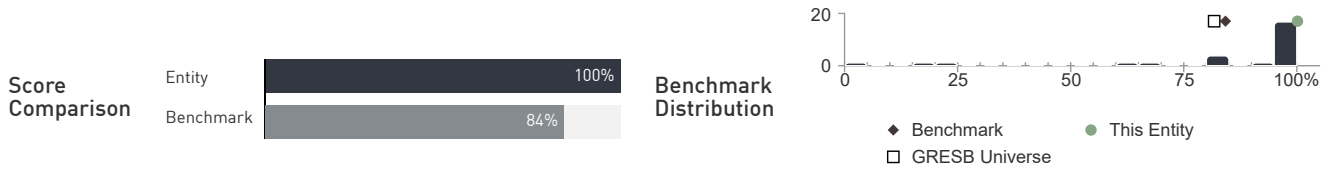
IFRS S2 is broadly consistent with the TCFD Recommended Disclosure a).

IFRS S2 requires disclosure of more detailed information, for example:

- the input parameters it uses to identify risks (for example, data sources, the scope of operations covered and the detail used in assumptions);
- whether and how the company uses climate-related scenario analysis to inform its identification of risks; and
- whether it has changed the processes used to identify, assess, prioritise and monitor risks compared to the prior reporting period.

IFRS S2 also explicitly requires additional disclosures on the processes used to identify, assess, prioritise and monitor opportunities.

Scores



RISK MANAGEMENT

Recommended Disclosure (b)

Description	GRESB Assessment Indicators	Alignment
Describe the organization's processes for managing climate-related risks.	RM6.1: Transition risk identification RM6.3: Physical risk identification	10/10

Guidance

The GRESB Real Estate Assessment addresses this recommended disclosure by asking about the description of the entity's process for prioritizing climate-related risks and how materiality determinations are made for such risks.

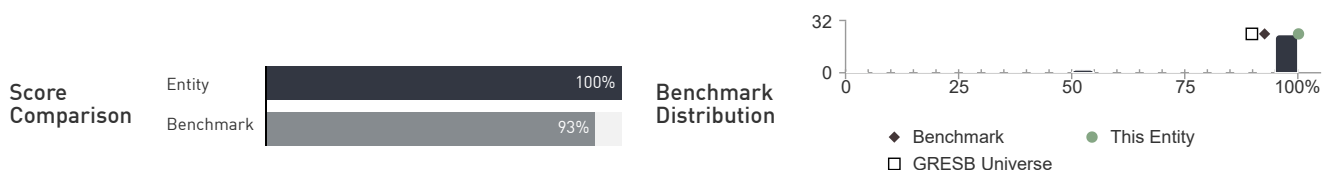
TCFD Guidance for All Sectors	GRESB Guidance
Organizations should describe their processes for managing climate-related risks, including how they make decisions to mitigate, transfer, accept, or control those risks.	Not explicitly addressed in the GRESB Assessment.
In addition, organizations should describe their processes for prioritizing climate-related risks, including how materiality determinations are made within their organizations.	Addressed in the open text boxes of Transition Risk Identification [RM6.1] and Physical Risk Identification [RM6.3] . While the processes for prioritization of the climate-related risks might differ based on whether they are transition risks or physical risks due to their treatment by different teams, use of different models, and use of different frameworks, it might be expected that how materiality determinations are made are similar, if not the same, if materiality is understood as an organizational concept.
In describing their processes for managing climate-related risks, organizations should address the risks included in Tables A1.1 and A1.2 (pp. 75-76) , as appropriate.	Addressed explicitly in open text boxes of Transition Risk Identification [RM6.1] and Physical Risk Identification [RM6.3] .

IFRS S2 Climate-related Disclosures

IFRS S2 is broadly consistent with the TCFD Recommended Disclosure b).

The risk management disclosure requirements in IFRS S2 focus on providing information about the processes used to identify, assess, prioritise and monitor climate-related risks and opportunities.

Scores



RISK MANAGEMENT

Recommended Disclosure (c)

Description	GRESB Assessment Indicators	Alignment
Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	RM6.2: Transition risk impact assessment RM6.4: Physical risk impact assessment	5/10

Guidance

The GRESB Real Estate Assessment addresses this recommended disclosure by asking about the description of how the entity's processes for identifying, assessing, and managing transition risks are integrated into its overall risk management.

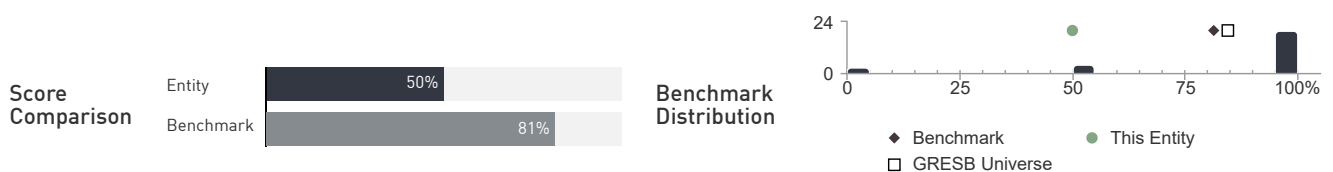
TCFD Guidance for All Sectors	GRESB Guidance
Organizations should describe how their processes for identifying, assessing, and managing climate-related risks are integrated into their overall risk management.	Addressed in the open text boxes of Transition Risk Impact Assessment (RM6.2) and Physical Risk Impact Assessment (RM6.4), which should include a brief description of the entity's overall risk management system and an explanation of how the entity's processes for identifying, assessing, and managing transition risks are integrated into this system.

IFRS S2 Climate-related Disclosures

IFRS S2 is broadly consistent with the TCFD Recommended Disclosure c).

IFRS S2 explicitly requires additional disclosures on the extent to which, and how, the processes used to identify, assess, prioritise and monitor opportunities are integrated into and inform the company's overall risk management process.

Scores



METRICS AND TARGETS

Recommended Disclosure (a)

Description	GRESB Assessment Indicators	Alignment
Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	EN1: Energy consumption GH1: GHG emissions WT1: Water use	8/10

Guidance

The GRESB Real Estate Assessment addresses this recommended disclosure by asking about the coverage of the climate-related metrics of Energy and Water consumption.

TCFD Guidance for All Sectors	GRESB Guidance
Organizations should provide the key metrics used to measure and manage climate-related risks and opportunities, as described in Tables A1.1 and A1.2 (pp. 75–76) , as well as metrics consistent with the cross-industry, climate-related metric categories described in Table A2.1 (p. 79) . 30 Organizations should consider including metrics on climate-related risks associated with water, energy, land use, and waste management where relevant and applicable.	The first of the TCFD's cross-industry, climate-related metric categories refers to GHG emissions, including absolute Scope 1, Scope 2, and Scope 3 emissions, and, notably, emissions intensity. For Real Estate, emissions intensity is often measured in kgCO ₂ e/m ² . The floor area-weighted emissions intensity of the portion of the portfolio for which there is 100% reported data coverage can be found in the GRESB Portfolio Impact . Furthermore, both energy and water consumption are important metrics to monitor. The availability of asset-level data with regard to these performance characteristics gives an indication of how suited an entity is able to use such metrics to inform its target-setting and risk management processes. The floor area-weighted consumption intensities of the portion of the portfolio for which there is 100% reported data coverage can be found in the GRESB Portfolio Impact .
Where climate-related issues are material, organizations should consider describing whether and how related performance metrics are incorporated into remuneration policies.	Not explicitly addressed in the GRESB Assessments.
Where relevant, organizations should provide their internal carbon prices as well as climate-related opportunity metrics such as revenue from products and services designed for a low-carbon economy.	Not explicitly addressed in GRESB Assessment.
Metrics should be provided for historical periods to allow for trend analysis. Where appropriate, organizations should consider providing forward-looking metrics for the cross-industry, climate-related metric categories described in Table A2.1 (p. 79) , consistent with their business or strategic planning time horizons. In addition, where not apparent, organizations should provide a description of the methodologies used to calculate or estimate climate-related metrics.	Data is reported for the current and previous reporting period. GRESB calculates Like-for-Like (LFL) change for entities, which can be found in Portfolio Impact . However, only assets that meet all of the following criteria, for both current and previous reporting years, are eligible for inclusion in the LFL calculations: <ul style="list-style-type: none"> • Data Availability covers the full year (> 355 days); • Data Coverage is positive; • Data Coverage is the same (within 1% error threshold); • The asset is classified as Standing Investment.
In addition, where not apparent, organizations should provide a description of the methodologies used to calculate or estimate climate-related metrics.	The methodologies used to aggregate asset-level metrics on data coverage, like-for-like, and intensities can be found in the GRESB Aggregation Rules Handbook .

IFRS S2 Climate-related Disclosures

IFRS S2 requires the same categories of cross-industry metrics as does the TCFD guidance.

In addition, IFRS S2 requires disclosure of industry-based metrics relevant to a company's business model and activities.

Scores



METRICS AND TARGETS

Recommended Disclosure (b)

Description	GRESB Assessment Indicators	Alignment
Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	GH1: GHG emissions	4/10

Guidance

The GRESB Real Estate Assessment addresses this recommended disclosure by asking about the disclosure of an entity's GHG emissions.

TCFD Guidance for All Sectors	GRESB Guidance
<p>Organizations should provide their Scope 1 and Scope 2 GHG emissions independent of a materiality assessment, and, if appropriate, Scope 3 GHG emissions and the related risks. All organizations should consider disclosing Scope 3 GHG emissions.</p>	<p>In corporate GHG reporting, building-related emissions may be classified as Scope 1, 2, or 3 depending on the reporting entity's organizational boundaries, consolidation approach, and leasing agreements. The GRESB Assessment categorizes building-related (fuels, energy, heating, and cooling) emissions from occupied tenant spaces as Scope 3 emissions. In real estate reporting, transition risk management, and other contexts, it is recognized that all building-related emissions (including energy-related tenant emissions) are material. Thus, if tenant-related emissions are classified as Scope 3 by the entity, it must disclose these Scope 3 emissions. The total emissions (sum of Scope 1, 2, and 3 emissions) can be found in Portfolio Impact. The split of the emissions into the different scopes can be found in the Benchmark Reports at the property sub-type level.</p> <p>GHG data coverage is important in understanding the quality of data used as the basis for decision making and should be disclosed alongside any final GHG figures.</p>
<p>GHG emissions should be calculated in line with the GHG Protocol methodology to allow for aggregation and comparability across organizations and jurisdictions. As appropriate, organizations should consider providing related, generally accepted industry-specific GHG efficiency ratios.</p>	<p>For real estate, the most common industry-specific GHG efficiency ratio is kgCO₂e/m² (or, in some geographies, kgCO₂e/sq.ft.).</p> <p>In the Benchmark Reports, users can find an entity's average GHG intensity at the Property Sub-Type level. The intensity is calculated for all assets from where the Data Coverage (in terms of floor area and time) is 100% and it is weighted by the floor areas of its constituent assets. GRESB uses the eligible assets' GFA as a denominator for determining intensities, and displays calculated values in either tCO₂/m² or tCO₂/sq.ft. depending on the unit selected by the participant.</p>
<p>GHG emissions and associated metrics should be provided for historical periods to allow for trend analysis.</p>	<p>Data is reported for the current and previous reporting period. GRESB calculates Like-for-Like (LFL) change for entities, which can be found in Portfolio Impact. However, only assets that meet all of the following criteria, for both current and previous reporting years, are eligible for inclusion in the LFL calculations:</p> <ul style="list-style-type: none"> • Data Availability covers the full year (> 355 days); • Data Coverage is positive; • Data Coverage is the same (within 1% error threshold); • The asset is classified as Standing Investment.

TCFD Guidance for All Sectors

Where not apparent, organizations should provide a description of the methodologies used to calculate or estimate the metrics.

GRESB Guidance

While location-based GHG calculation is the minimum requirement for GRESB as well as many other standards, the ability to calculate and report GHG emissions using market-based methods demonstrates an enhanced ability to monitor and manage transition risks within a real estate portfolio. Whether reporting just location-based figures, or both location-based and market-based figures, it is important to clarify which method is used, to report them separately, and to not mix reporting methods. Aggregating figures from assets and entities using different approaches leads to missed emissions and double-counting.

The methodologies used to aggregate asset-level metrics on data coverage, like-for-like, and intensities can be found in the GRESB [Aggregation Rules Handbook](#).

IFRS S2 Climate-related Disclosures

IFRS S2 is broadly consistent with the TCFD Recommended Disclosure b).

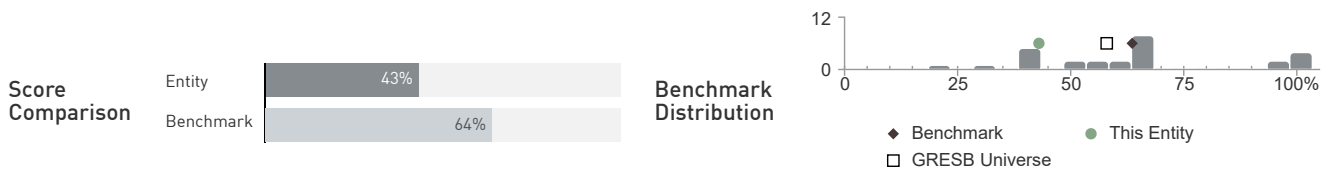
IFRS S2 requires additional disclosures related to a company's GHG emissions, including:

- a separate disclosure of Scope 1 and Scope 2 GHG emissions for (1) the consolidated accounting group, and (2) associates, joint ventures, unconsolidated subsidiaries or affiliates not included in the consolidated accounting group;
- Scope 2 GHG emissions using a location-based approach and information about any contractual instruments that is necessary to inform users' understanding;
- Scope 3 GHG emissions disclosures, including additional information about the company's financed emissions if the company has activities in asset management, commercial banking or insurance; and
- information about measurement approach, inputs and assumptions used in measuring Scope 3 GHG emissions.

In addition, IFRS S2 sets out a Scope 3 measurement framework to provide guidance for preparing Scope 3 GHG emissions disclosures.

While IFRS S2 does not explicitly require a company to disaggregate its GHG emissions disclosures by the constituent gases, IFRS S1 includes requirements on disaggregation that would result in the disclosure of the constituent gases being required if such disaggregation provides material information.

Scores



METRICS AND TARGETS

Recommended Disclosure (c)

Description	GRESB Assessment Indicators	Alignment
Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	T1.1: Portfolio improvement targets	10/10

Guidance

The GRESB Real Estate Assessment addresses this recommended disclosure by asking about the reporting of key climate-related targets, including their base year, the time frame, and whether the target is absolute or intensity-based.

TCFD Guidance for All Sectors	GRESB Guidance
Organizations should describe their key climate-related targets such as those related to GHG emissions, water usage, energy usage, etc., in line with the cross-industry, climate-related metric categories in Table A2.1 (p. 79) , where relevant, and in line with anticipated regulatory requirements or market constraints or other goals. Other goals may include efficiency or financial goals, financial loss tolerances, avoided GHG emissions through the entire product life cycle, or net revenue goals for products and services designed for a low-carbon economy.	Addressed in GRESB Assessment indicator Portfolio improvement targets (T1.1) and summarized here . Additional context regarding the methodology used to establish the targets and communicate the anticipated pathways to achieve these targets is also provided. This will increase in importance as regulations begin to align with the TCFD's Guidance on Metrics, Targets, and Transition Plans .
In describing their targets, organizations should consider including the following: <ul style="list-style-type: none"> • whether the target is absolute or intensity based; • time frames over which the target applies; • base year from which progress is measured; and • key performance indicators used to assess progress against targets. 	Addressed. See above.
Organizations disclosing medium-term or long-term targets should also disclose associated interim targets in aggregate or by business line, where available.	Addressed. See above.
Where not apparent, organizations should provide a description of the methodologies used to calculate targets and measures.	Addressed in GRESB Assessment indicator Portfolio improvement targets (T1.1) and summarized here . Additional context regarding the methodology used to establish the targets and communicate the anticipated pathways to achieve these targets is also provided. This will increase in importance as regulations begin to align with the TCFD's Guidance on Metrics, Targets, and Transition Plans .

IFRS S2 Climate-related Disclosures

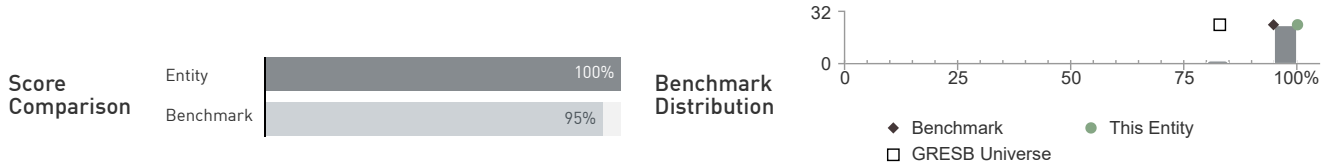
IFRS S2 is broadly consistent with the TCFD Recommended Disclosure c).

IFRS S2 differs from the TCFD guidance in, for example, requiring disclosures about how the latest international agreement on climate change has informed the target and whether the target has been validated by a third party.

IFRS S2 requires disclosure of more detailed information on GHG emissions targets, including additional information about the planned use of carbon credits to achieve a company's net GHG emissions targets.

IFRS S2 also includes additional requirements to disclose information about the approach to setting and reviewing each target, and how it monitors progress against each target, including whether the target was derived using a sectoral decarbonisation approach.

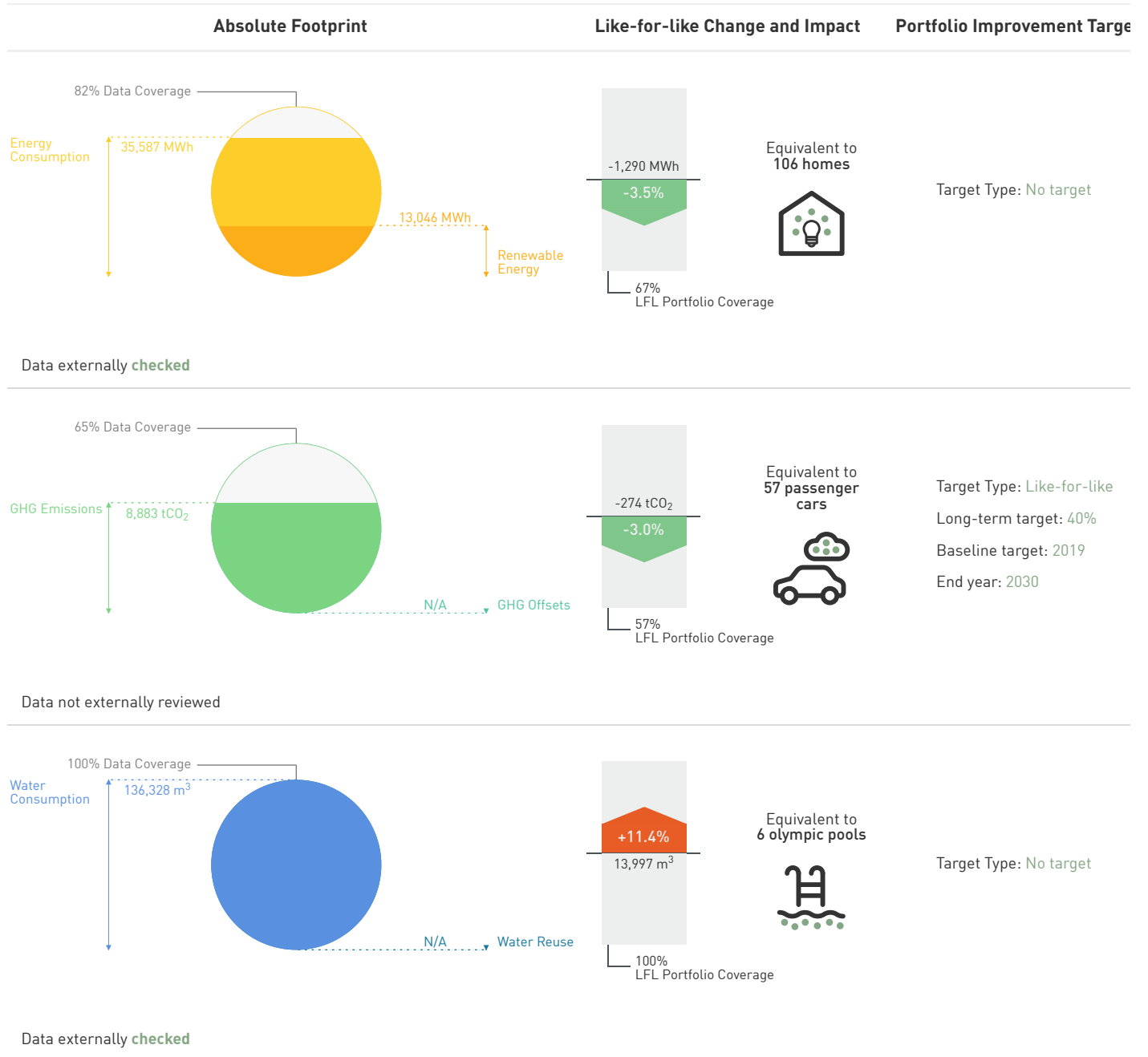
Scores



Appendix I: Relevant Assessment Responses and Benchmark Outputs

Assessment responses and associated Benchmark Report outputs are included in the following section insofar as they are relevant to include and inform a Participant's TCFD reporting efforts. Use this section in coordination with the Guidance per TCFD Recommended Disclosure section above, to understand where more work to collect particular data might be warranted.

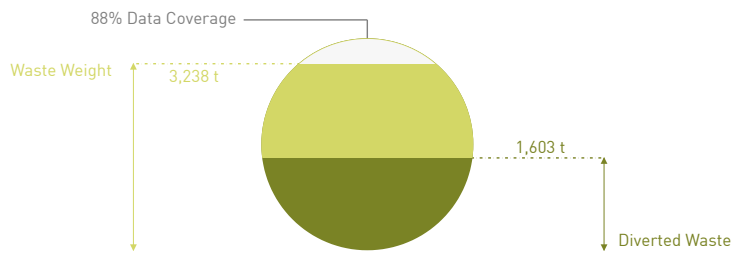
Portfolio Impact



Absolute Footprint

Like-for-like Change and Impact

Portfolio Improvement Target



Equivalent to
229 truck loads



Target Type: Absolute
Long-term target: 75%
Baseline target: 2019
End year: 2025

Data not externally reviewed

Portfolio Improvement Targets (Summary)

	Type	Long-term target	Baseline year	End year	Externally communicated
☁ GHG emissions	Like-for-like	40%	2019	2030	Yes
♻ Waste diverted from landfill	Absolute	75%	2019	2025	Yes
🏢 Building certifications	Absolute	100%	2019	2025	Yes
📄 Data coverage	Absolute	90%	2019	2030	Yes
🔌 green electricity	Absolute	100%	2019	2025	Yes

Methodology used to establish the targets and anticipated pathways to achieve them:

🔗 Targets were set based on individual building assessments. Overall, long term regulatory targets (Paris Agreement, German Climate Action Plan), investor requirements and expectations of external stakeholders (e. g. tenants and visitors) were taken into account. Goals were set on group level and approved by the highest level decision makers, the ECE management board. The goals are adopted for every asset and complemented with an individual action plan. In addition, the goals are published in the sustainability report "Future Forward", communicated to the investors and every department within ECE.

The Targets and KPIs are explained as follows:

Waste diverted from landfill: waste separation quota: 75% of all waste is intended to be recycled until 2025.

GHG: a reduction of 40% is aimed by ECE for its real estate portfolio.

Building certification: 100% of ECE real estate portfolio should be certified by 2025. 100% of the assets in this fund have a green building certificate.


Data coverage: 90% of all long-term leases are aimed to comply with the Green Lease Standard


Green electricity: the goal is to use 100% green electricity in all shopping centres. In the German Shopping Centres, the target is already reached.

Relevant Indicator Responses


LE3

Individual responsible for ESG, climate-related, and/or DEI objectives

Yes 100%  ^

ESG 100%  ^

The individual(s) is/are

Dedicated employee(s) for whom ESG is the core responsibility 89% 


Name: Maria Hill

Job title: Director Sustainability & Corporate Communications

Employee(s) for whom ESG is among their responsibilities 87% 

Name: Stefan Hinz


Job title: Team Lead Sustainability and Corporate Communications and Corporate Operations & Solutions

External consultants/manager 77% 


Name of the main contact: Timo Manssen

Job title: Manager Real Estate Fund Operations & Strategy at EY

Investment partners (co-investors/JV partners) 4% 


Climate-related risks and opportunities 99%  ^

The individual(s) is/are

Dedicated employee(s) for whom climate-related issues are core responsibilities 84% 


Name: Maria Hill

Job title: Director Sustainability & Corporate Communications

Employee(s) for whom climate-related issues are among their responsibilities 86% 


Name: Stefan Hinz

Job title: Team Lead Sustainability and Corporate Communications and Corporate Operations & Solutions

External consultants/manager 71% 

Name of the main contact: Timo Manssen

Job title: Manager Real Estate Fund Operations & Strategy at EY

Investment partners (co-investors/JV partners) 3% 

Diversity, Equity, and Inclusion (DEI)

96%  ^

The individual(s) is/are

Dedicated employee for whom DEI is the core responsibility

76% 

Name: Melanie Krüger

Job title: Diversity Managerin

Employee for whom DEI is among their responsibilities

73% 

Name: Dr. Stephanie Dutzke-Wittneben

Job title: Vertrauensperson/ Staff Counselor

External consultant/manager

23% 

Investment partners (co-investors/JV partners)

2% 

No

0% 

LE5

ESG, climate-related and/or DEI senior decision maker

Yes

100%  ^

ESG

99% 

Name: Maria Hill

Job title: Director Sustainability & Corporate Communications

The individual's most senior role is as part of



[44%] Board of Directors

[47%] C-suite level staff/Senior management

[<1%] Investment Committee

[7%] Fund/portfolio managers

[<1%] Other

[1%] No answer provided

Climate-related risks and opportunities

98% 

Name: Maria Hill

Job title: Director Sustainability & Corporate Communications

The individual's most senior role is as part of



- [41%] Board of Directors
- [48%] C-suite level staff/Senior management
- [1%] Investment Committee
- [7%] Fund/portfolio managers
- [<1%] Other
- [2%] No answer provided

Diversity, Equity, and Inclusion (DEI)

96%

Name: Melanie Krüger

Job title: Diversity Managerin

The individual's most senior role is as part of:



- [38%] Board of directors
- [54%] C-suite level staff/Senior management
- [1%] Fund/portfolio managers
- [<1%] Investment committee
- [2%] Other
- [4%] No answer provided

Process of informing the most senior decision-maker

The ECE Group (ECE) has clearly defined sustainability management structures. The sustainability department consists of the Sustainability and Communications Director and the Sustainability Team Leader. The ten cross-divisional Sustainability Coordinators, who are represented in each department, are led by the Sustainability Team leader. The Director Sustainability & Corporate Communications, who acts as the point of contact for the two-member ECE board – which includes the CEO. The Director Sustainability & Corporate Communication and the Sustainability team are responsible for all ECE's sustainability activities and monitor the social, economic, and political environment. Furthermore, the Director Sustainability & Corporate Communication develops and re-adjusts the overall ECE sustainability strategy, which also accounts for all subsidiaries. The strategy is signed off by the ECE Board members and includes standards, targets and processes for the whole ECE. Furthermore, ECE collects and evaluates the data for all assets. Within the data collection process, ECE collects the necessary data for the sustainability reporting. The annual performance data is reported to the Director of Sustainability and Corporate Communications. Within a quarterly portfolio report, current data updates are validated. If implausible performances occur the senior decision-makers are informed on short-term notice. The Group's sustainability department is responsible for association work, ESG related reporting and monitoring of group level targets. Measures are derived by the operational team and consulted by the internal team "Environmental Engineering & Grants". Funds are advised by external sustainability consultants on strategy, frameworks and regulatory requirements.

No

<1%

RM5

Resilience of strategy to climate-related risks

Yes

91% ^


Description of the resilience of the organization's strategy

Sustainability risks are integrated in the AIFMs processes as part of implemented policies and procedures. The management of sustainability risks is executed at pre-investment, ongoing (operational) and post-investment phases. 1) Pre-investment phase The sustainability risks are taken into account in the investment decision-making process under consideration of the pre-contractual disclosures of the respective vehicle pursuant to EU Regulation 2019/2088 article 6 (1). Transition risks and physical risks are considered (see RM6.1-RM6.4). 2) Ongoing and/or post-investment The ongoing monitoring of sustainability risks is ensured through the integration of the risks within the risk profile of each managed vehicle by considering relevant sustainability risk indicators/factors. The identification and selection of the sustainability risk

indicators/factors is based on the investment strategy of the fund. The risk manager is responsible for the ongoing monitoring of the relevant sustainability risk indicators/factors in accordance with the risk profile of the fund. In accordance with the disclosure requirements of the Taxonomy Regulation the robust climate risk and vulnerability assessment is conducted on an annual basis. The occurrence of sustainability risks can have a significant impact on the value and/or return of the investments and on the return of the fund. The risk management aims to identify, consider and prevent the occurrence of sustainability risks as early as possible in the investment decision making process (= minimize possible impacts on Investments and the return of the Fund). Once risks have been identified, investments in the asset are only made if measures can be taken to reduce them.

Use of scenario analysis

Yes 83% 

No 8% 


No 9% 

Additional context


[Not provided]

RM6.1

Transition risk identification


Yes 94%  ^


Elements covered

Policy and legal 93%  ^


Any risks identified


Yes 87% 


No 6% 

Technology 86%  ^

Any risks identified


Yes 80% 


No 6% 

Market 87%  ^

Any risks identified


Yes 83% 

No 5% 

Reputation 81%  ^

Any risks identified

Yes 75% 

No 7% 

Applicable evidence

Evidence provided

[2022_RM6.1_Risk-Management-Policy.pdf](#)

Processes for prioritizing transition risks

66 A robust climate risk and vulnerability assessment is part of the investment analysis at ECE-REP. ECE-REP divides transitional risk (TR) into three pillars. The priority of the risk is assessed by a rating which includes the severity (financial impact) and the likelihood of occurrence. TR – Regulatory risk The portfolio manager and compliance officer continuously monitor any developments in the regulatory environment to ensure that they are complied with. This measure is taking place on a quarterly basis. TR – technological risk The portfolio manager and the investment director continuously monitor any technological changes needed as a result of ESG factors and ensure that necessary CAPEX measures (e.g. reduction of energy consumption in favor of renewable energy, optimization of waste management etc.) are reflected in the business plan. This is an ongoing measure. TR – Reputation risk The portfolio manager and the investment director reviews measures to face micro- and macroeconomic factors at the level of the investments and the investment strategy. This is an ongoing measure to realize a potential loss of stakeholder trust in the company's competence or integrity. TR - Market risk The portfolio manager and the investment director reviews measures to face micro- and macroeconomic factors of the investments and the investment strategy. External financing is at fixed rates or hedged with financial hedging. Estimated collection curves, forecasting volume and timing of cashflows to be received from such Target Assets in terms of cashflow risk. Changes on market interest rates affecting the discounted cash flow are controlled.

No 6% 


Additional context

[Not provided]

RM6.2

Transition risk impact assessment


Yes 89% 

No 11% 


Additional context

[Not provided]


Physical risk identification

Yes 93% 


Elements covered


Acute hazards 91% 

Any acute hazards identified


Yes 78% 

Factors are

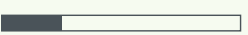
Extratropical storm 23% 

Flash flood 48% 

Hail 22% 


River flood 69% 

Storm surge 35% 


Tropical cyclone 25% 

Other 27% 

No 13% 

Chronic stressors 89% 


Any chronic stressors identified

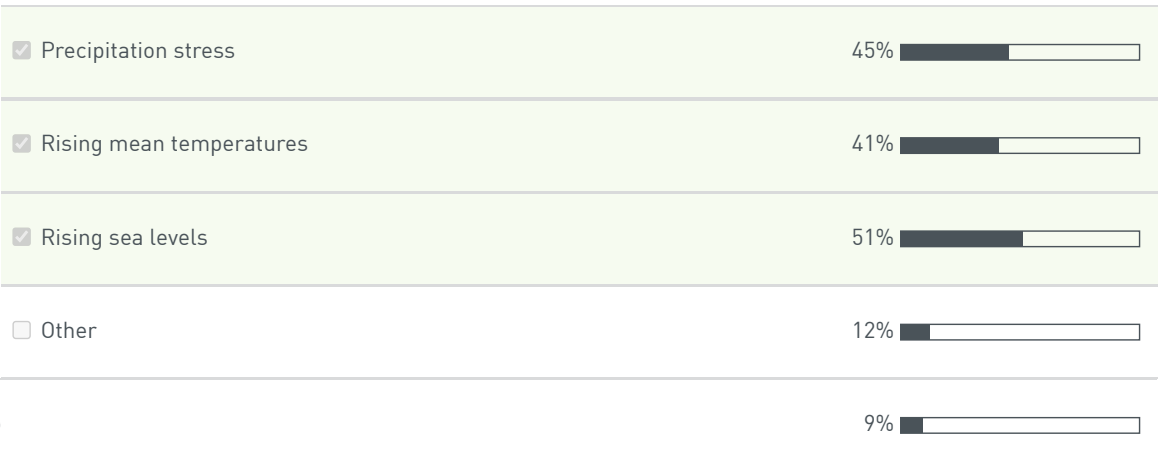
Yes 80% 

Factors are

Drought stress 51% 

Fire weather stress 30% 

Heat stress 61% 



Applicable evidence

Evidence provided

[2022_RM6.1_Risk-Management-Policy.pdf](#)

[2022_RM6.3_EPIG_climate_risk_assessments.pdf](#)

Physical risks prioritization process

🔗 Investment properties are influenced by their location based on the country, region, city or a specific catchment area. The location of the asset is among the main factors analyzed during the acquisition phase. During the pre-investment phase specific asset-related physical risks are identified. A technical and environmental DD is performed by an external provider. Physical risks are monitored and managed by an ongoing risk management monitor. Measures: Investment country's vulnerability and readiness to climate changes are considered in any investment decisions. AIFM reviews the investment committee's proposal and approves/declines the acquisition. Risk Management monitors respective country's ratings (NO-GAIN Country Index, Environmental Performance Index). This is measured on occurrence. The sustainability indices are monitored at acquisition and updated yearly. Depending on the development of the identified risks different types of action to mitigate the risk take place. Technical and environmental DDs are performed by an external advisor and the identified physical risks are one of the key documents for any investment decision. Climate Risks were assessed by the K.A.R.L. methodology. This climate risk assessment is undertaken by a third-party insurance company and was performed for each asset in the portfolio. The K.A.R.L. climate profile provides information about possible future trends in climate extremes at the site of investigation. The assessment examines climate related risks in regard to temperature, wind, water and soil-mass. The given indices essentially reflect the requirements for chronic and acute risks (i.e. in relation to exposure to temperature and precipitation or drought) from the EU Taxonomy regulation (2020/2021).

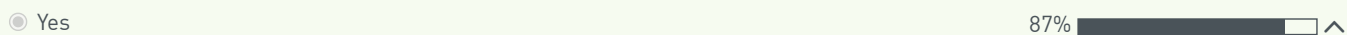


Additional context

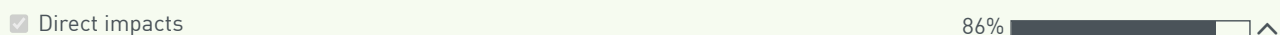
[Not provided]

RM6.4


Physical risk impact assessment




Elements covered




Any material impacts to the entity

Yes 62%  ^

Impacts are


Increased capital costs 58% 

Other 6% 


Value of Investment

[ACCEPTED]


No 24% 


Indirect impacts 79%  ^

Any material impacts to the entity

Yes 60%  ^

Impacts are

Increased insurance premiums and potential for reduced availability of insurance on assets in "high-risk" locations 44% 

Increased operating costs 50% 

Reduced revenue and higher costs from negative impacts on workforce 11% 

Reduced revenue from decreased production capacity 6% 

Reduced revenues from lower sales/output 26% 

Write-offs and early retirement of existing assets 27% 

Other <1% 


No 19% 

Applicable evidence

Evidence provided

[2022_RM6.1_Risk-Management-Policy.pdf](#)

Integration of physical risk identification, assessment, and management into the entity's overall risk management

 Investment properties are influenced by their location based on the country, region, city or even a specific catchment area. The location of the asset is among the main factors analyzed during the acquisition phase. During the pre-investment phase specific asset-related physical risks are identified. A technical and environmental due diligence is performed by an external provider. Physical risks are monitored and managed by an ongoing risk management monitor. Furthermore, the

comprehensive mitigation and capex plan to address any material physical risks identified are in place before taking the investment decisions. This is measured on occurrence. In addition, an insurance contract for all assets to ensure extensive warranties and indemnities insurance coverage for the share purchase agreement and also for the property/real estate finance project is signed. An up-to-date register of existing insurance contracts, including their maturity dates, is maintained and followed up by Risk Management. This is an ongoing measure.

No

13% 

Additional context

[Not provided]