



GREEN FINANCING FRAMEWORK

September 2025

STEEN  STROM

BACKGROUND

About us

Steen & Strøm is a Scandinavian shopping center operator, with nine leading centers located in the most attractive marketplaces in Denmark, Norway, and Sweden, attracting nearly 60 million visitors annually. Our ownership is strong and stable, with the Klépierre Group and APG as major stakeholders. As a fully integrated member of the Klépierre Group, the European leader in shopping malls, we benefit from a blend of property development and asset management expertise. Leveraging our strategy of focusing on assets in fast-growing metropolitan areas, we pursue a policy of targeted growth through expansions and renovations designed to cement each mall's prominence as a regional leader.

Sustainability at Steen & Strøm

Steen & Strøm has long managed a sustainability programme aimed at leading corporate responsibility within our industry. Shopping centers play a vital role in local communities and are well-positioned to positively influence the environment and society. Environmental and social responsibility is also a strategic priority for Klépierre, extending to all its subsidiaries. To achieve our sustainability vision, Steen & Strøm, in collaboration with Klépierre, has launched the Act4Good strategy. The strategy's goal is to build the most sustainable platform for commerce, with ambitious targets to be achieved by 2030 across the four pillars outlined to the right.

The Act4Good Committee, our sustainability steering committee, includes senior management representatives such as the CEO, Technical Director, COOs, Heads of Marketing, HR, Leasing, and the CSR Manager. Quarterly Act4Good calls are held with Klépierre to review our sustainability progress and ensure we are on track to meet our targets.

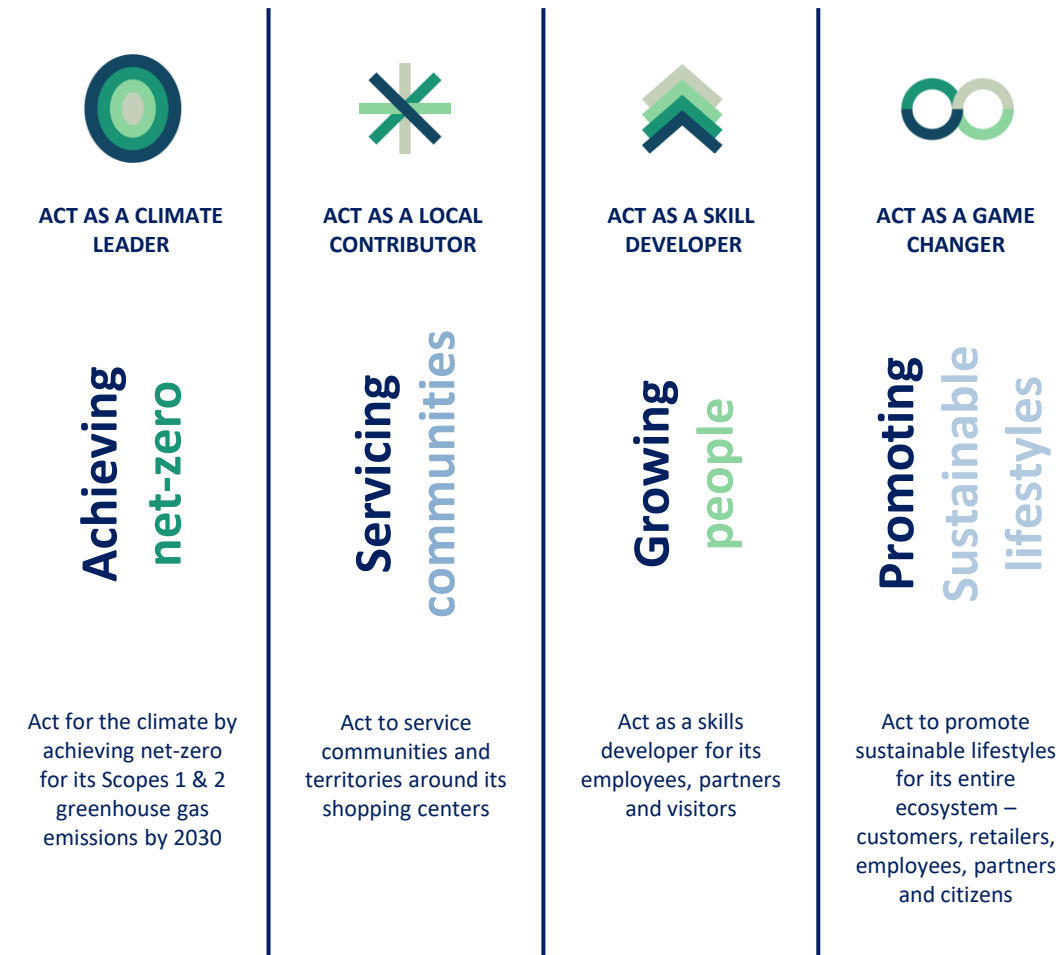


Figure 1: Overview of Steen & Strøm's sustainability strategy – Act4Good

Achieving net zero

As a climate leader, Steen & Strøm is committed to tackling major climate challenges by reducing greenhouse gas (GHG) emissions, integrating a comprehensive carbon footprint, and developing resilient assets. Our main goal is to achieve net zero emissions in scope 1 and 2 by 2030. To deliver on the commitment, we purchase green district heating, invest in heat pumps and renewable energy solutions, upgrade cooling systems to minimise climate impact, and implement digital solutions such as AI to enhance energy efficiency. Since 2014, Steen & Strøm has adhered to ISO-14001 standards, conducting annual audits with third-party auditors.

Furthermore, we have set objectives in key areas crucial for reducing both our direct and indirect environmental and climate impact. These include measuring and supporting our tenants in lowering their energy consumption, increasing the production of renewable energy, and promoting the circular economy through recycling and reuse. We also engage with our visitors to encourage reduced transport-related emissions by providing electric vehicle charging, bicycle parking and repair facilities, and information on alternative transport options like trains and buses. The targets of making 100% of our shopping centers accessible by public transport and equipping them with charging stations for electric vehicles have already been achieved.

In major development projects, we adhere to the international BREEAM classification system, aiming for an "Excellent" level and BREEAM In-use certification for existing centers. We are also committed to achieving net-zero land use for all development projects. Such efforts have earned Steen & Strøm top scores in the Global Real Estate Sustainability Benchmark (GRESB), ranking first in our peer group. To safeguard the long-term value of our assets, an external party conducted a Climate Risk Assessment across our property portfolio in 2022 to evaluate various climate risks and their potential impacts on our business. We monitor these assessments using our Komply tool to ensure timely actions are taken by the relevant management levels.



ENERGY EFFICIENCY

- Measure our retailers' private energy consumption in our shopping centers.
- Support our retailers in achieving a 20% reduction in their energy consumption.



PRODUCTION OF RENEWABLES

- Produce renewable energy locally to reach up to 30% of self-consumption for the top 5 assets in Steen & Strøm



MOBILITY

- Engage our visitors with the aim of achieving a 40% decrease in carbon emissions related to their transportation.



CIRCULAR ECONOMY

- Ensure all our new development & refurbishment projects include low-carbon solutions.
- Support our retailers in creating low-carbon shops (structural works and fit-outs).



BIODIVERSITY

- Commit to net-zero land use for all shopping center development projects.



CERTIFICATION

- Obtain operational sustainability certification for all our shopping centers.

Servicing communities

As a local contributor, Steen & Strøm prioritises community engagement by ensuring our shopping centers are accessible to everyone and offering valuable services to simplify the daily lives of our visitors.

We actively contribute to local communities through initiatives such as Giving Back projects, offering green services to visitors in all our centers, and ensuring compliance with internal standards on diversity and inclusion. Additionally, we are working to equip each shopping center with a disaster relief plan to support local communities in times of need.



LOCAL CONTRIBUTION

- Set up a GIVING BACK project per center with high impact for local communities.



GREEN SERVICES

- Offer green services to visitors in all our shopping centers (recycling/repair stations, clothes collection points, etc.).



DIVERSITY & INCLUSION

- Make all our shopping centers compliant with a set of internal Inclusion standards.



CARING PLACES

- Ensure one shopping center per local territory is equipped with a disaster relief plan for local communities.

Growing people

Steen & Strøm's most important resource is our employees, and we aim to promote a healthy working environment for everyone. Risk assessment has been prepared for each center, as well as feedback from employees.

Steen & Strøm strives to offer regular courses in safety, first aid and fire fighting for all relevant staff. As a skills developer, Steen & Strøm focuses on upskilling employees annually in corporate social responsibility, establishing Klépierre Academies to improve employability, including inclusion clauses in service provider contracts, engaging employees in sponsorship programs to empower communities, and protecting physical and mental health.



SKILLS DEVELOPMENT

- Upskill our employees in CSR every year.
- Create training programs for our partners and communities to upskill people and improve their employability in our Top-5 malls.



CORPORATE SPONSORSHIP

- Engage all employees in sponsorship programs aimed at empowering local communities.



HEALTH

- Protect people's physical and mental health by enabling access to preventive healthcare programs in all our workplaces and local communities.



STAFF ENGAGEMENT

- Ensure all staff have their performance appraised based on at least 1 CSR criteria



DIVERSITY, EQUITY & INCLUSION

- Reach 40% of women in Top Management, with non-significant pay gaps.
- Include an inclusion clause in all our service providers' contracts (disability, long-term unemployment, deprived neighborhoods).

Promoting sustainable lifestyles

Our commitment to reshaping retail involves expanding our offering to include more sustainable consumption options with dedicated units to responsible local concepts, raising awareness, supporting responsible initiatives and celebrating everyone's efforts.

Corporate governance

Steen & Strøm is committed to adhering to legal requirements, regulations, and ethical business practices. The Group prioritizes transparency in its economic performance and operations, basing corporate governance on Norwegian principles and aligning with international guidelines. In 2024, Klépierre introduced a new Code of Conduct for anti-corruption applicable to all Steen & Strøm employees. Steen & Strøm also maintains an employee manual and ethical guidelines incorporating anti-corruption measures, procedures for whistleblowing, and notifications in line with the Working Environment Act. The Group has established methods to detect potential corruption, including assessing conflicts of interest and managing gifts and invitations according to Klépierre's framework. All new employees are required to complete a virtual anti-corruption training program.



THE SUSTAINABILITY COMMITMENT OF OUR RETAILERS

- Promote sustainable commerce across all our shopping centers.
 - Showcase the responsible products/services of our retailers.
- Assess the CSR engagement of our tenants before signing leases.



NEW RESPONSIBLE CONCEPTS

- Dedicate a specific area to new local, responsible concepts in our Scandinavian shopping centers.



VISITORS' AWARENESS

- Raise our visitors' awareness of sustainable lifestyles through responsible events.
- By organizing at least 3 events/year (nutrition, sustainable consumption, etc.).
- By making sure that our events are organized responsibly.



INNOVATION

- Organize a biennial contest to support and promote 3 players (1 retailer, 1 service provider, 1 technical solution provider) committed to the low-carbon transition.

Steen & Strøm's rationale for green financing

The real estate sector accounts for around 40% of total energy consumed and over one third of the energy-related GHG emissions in Europe. In this context and as a commercial real estate owner and manager, Steen & Strøm has a central role to play in the decarbonization of its portfolio of shopping centers and in the promotion of resilient and sustainable retail.

This Green Financing Framework (the “Framework”) is an important next step for Steen & Strøm to further align its financing strategy with its long-term sustainability objectives, as outlined in its Act4Good program. The Framework enables Steen & Strøm to issue “Use of Proceeds”-based green finance instruments, including bonds, loans, and any other financing instruments. By issuing green finance instruments, Steen & Strøm aims to link its financing policy to its pioneering sustainability strategy and, as a result, attract more ESG-focused investors to its credit profile.

The Framework is aligned with the International Capital Market Association's (ICMA) Green Bond Principles (2025) and the Loan Market Association's (LMA) Green Loan Principles (2025), and follows its four core components:

- 1) Use of Proceeds
- 2) Process for Project Evaluation and Selection
- 3) Management of Proceeds
- 4) Reporting



1) USE OF PROCEEDS

Allocation of net proceeds

An amount equal to the net proceeds from green finance instruments issued by Steen & Strøm will finance or refinance, in whole or in part, an Eligible Green Portfolio, that comprises eligible green assets and capital expenditures undertaken by Steen & Strøm or its subsidiaries. The Eligible Green Portfolio must align with the eligibility criteria defined in the following pages, in each case as determined by Steen & Strøm. The financing of the Eligible Green Portfolio is expected to contribute to achieving Steen & Strøm's sustainability strategy, the EU environmental objective of Climate Change Mitigation as per the European Taxonomy as well as Sustainable Development Goals 7 "Affordable and clean energy" and 11 "Sustainable cities and communities".

Prior to the issuance of green finance instruments, Steen & Strøm will, on a best-effort basis, provide information to investors of the expected allocation of proceeds per eligible Green Category as well as estimated financing versus refinancing.

Financing and refinancing

An amount equal to the net proceeds can finance both existing and new Green Assets and Capital Expenditures financed by Steen & Strøm or its subsidiaries. New financing is defined as allocated amounts to Green Assets and Capital Expenditures financed within the reporting year, and refinancing is defined as allocated amounts to Green Assets and Capital Expenditures financed prior to the reporting year. The distribution between new financing and refinancing will be reported in Steen & Strøm's annual Green Impact Report.

1) USE OF PROCEEDS

Exclusions

The proceeds from Steen & Strøm's green finance instruments will not be directly allocated to projects involving fossil energy production, nuclear energy generation, potentially environmentally harmful resource extraction (such as rare-earth elements or fossil fuels) or gambling.

EU Taxonomy


The EU Taxonomy is a classification system, establishing a list of environmentally sustainable economic activities, with the aim of scaling up sustainable investments. Environmentally sustainable activities are economic activities that make a substantial contribution to at least one of the Taxonomy's six environmental objectives while doing no significant harm to any of the other five objectives and fulfilling Minimum Safeguards.

Steen & Strøm recognizes the importance of common definitions for activities to qualify as sustainable. The eligibility criteria for the Green Assets and Capital Expenditures in this Framework aim to align with the criteria set out in the EU Taxonomy for climate change mitigation, to the extent feasible and reasonable. Additionally, it includes eligibility criteria aligned with credible market standards, such as sustainable building certifications and energy performance requirements based on the CRREM-SBTi decarbonization pathways aligned with the 1.5°C target for the real estate sector.

Look-back period

Eligible Green Assets will be included in the Eligible Green Portfolio at their appraisal value and without a specific lookback period. Eligible Green Capital Expenditures qualify with a maximum look-back period of two years.

1) USE OF PROCEEDS

Eligible Green Categories	EU Taxonomy objective and eligible category	Eligibility criteria	SDGs
Green Buildings	Climate change mitigation 7.7 "Acquisition and ownership of buildings"	Acquisition and ownership of new or existing shopping centers that comply with one of the following criteria: <ul style="list-style-type: none"> Technical Screening Criteria* and Minimum Safeguards set out in the EU Taxonomy Regulation, mainly inter alia: <ul style="list-style-type: none"> a) Buildings built before 12/31/2020: EPC label "A" or belonging to the top 15% in primary energy demand (PED); b) Buildings built after 1/1/2021: PED 10% below locally applicable nearly-zero energy building (NZEB) requirements Buildings certified in accordance with the BREEAM "In-Use" scheme and with an assessment rating ≥ "Excellent" or equivalent, or Energy intensity below the CRREM decarbonization yearly targets¹ for shopping centers in the relevant country 5 years ahead. 	 
	Climate change mitigation 7.2 "Renovation of existing buildings" ²	Renovation of shopping centers that comply with the following criteria: <ul style="list-style-type: none"> BREEAM "Refurbishment and Fit Out" ≥ "Excellent" or any equivalent certification. 	
Renewable energy	Climate change mitigation 7.6. Installation, maintenance and repair of renewable energy technologies	Investments in installation and operation of new or existing renewable energy technologies (e.g. on-site solar photovoltaic systems, heat pumps) which comply with the Technical Screening Criteria* and Minimum Safeguards set out in the EU Taxonomy Regulation.	
Clean transportation	Climate change mitigation 7.4 Installation, maintenance and repair of charging stations for electric vehicles	Investments and expenditures to promote sustainable transportation modes e.g., electric vehicle charging infrastructure and bicycle parking) which comply with the Technical Screening Criteria* and Minimum Safeguards set out in the EU Taxonomy Regulation.	

* Technical Screening Criteria includes compliance with the Substantial Contribution to Climate Mitigation criteria and Do No Significant Harm ("DNSH") criteria. See Appendix 1 for more details.

- CRREM (Carbon Risk Real Estate Monitor) provides energy intensity targets as part of its framework for decarbonizing buildings. The targets guide real estate assets toward reaching net-zero emissions by 2050. For a given reporting year Y, the applicable threshold under this framework is the energy intensity threshold defined by CRREM for Y+5, in kWh Final Energy/m²/year for the relevant country. See Appendix 2 for more information about the target trajectory.
- Due to its activity, Steen & Strøm is not subject to economic activity 7.2 of the European Taxonomy. However, the company proposes to use these associated technical criteria, on a voluntary basis, for this framework purposes.

2) THE PROCESS FOR PROJECT EVALUATION AND SELECTION

ESG risk management

Eligible Green Assets and Capital Expenditures under the Framework are expected to comply with local laws and regulations, as well as Steen & Strøm internal policies and standards related to environmental and social risks.

Steen & Strøm is committed to responsible corporate governance practices and the assessment and management of environmental, social, governance and financial risks are core components of our decision-making processes. Our risk management strategy is stated in our policies, guidelines and instructions.

The process for evaluation and selection of Green Assets and Capital Expenditures will follow the same standard due diligence and decision-making process, to ensure adequate identification and management of environmental and social risks related to the Green Assets and Capital Expenditures.



2) THE PROCESS FOR PROJECT EVALUATION AND SELECTION

Green Finance Committee

The process for project evaluation and selection is essential to ensure that an amount equal to the net proceeds from green finance instruments is allocated to Green Assets and Capital Expenditures eligible under this Framework. Steen & Strøm has established a Green Finance Committee (GFC), which is responsible for overseeing the process and based on the following steps:

- Representatives within Steen & Strøm's different business segments evaluate potential Green Assets and Capital Expenditures, their compliance with the eligibility criteria, and their environmental benefits.
- A list of the potential Green Assets and Capital Expenditures is presented to the GFC. The GFC is solely responsible for acknowledging the project as green, in line with the eligibility criteria. Green Assets and Capital Expenditures will be marked as green in the dedicated Eligible Green Portfolio. A decision to allocate net proceeds will require consensus decision by the GFC. The decisions made by the GFC will be documented and filed.

The GFC is consisting of the CEO, CFO and CIO of Steen & Strøm and will convene at least once a year. For the avoidance of doubt, the GFC holds the right to exclude any Green Assets and Capital Expenditures already funded by green finance instruments net proceeds. If a Green Assets and Capital Expenditures is sold, or for other reasons loses its eligibility, funds will then follow the procedure under Management of Proceeds until reallocated to other eligible Green Assets and Capital Expenditures.



2) THE PROCESS FOR PROJECT EVALUATION AND SELECTION

Special considerations for Eligible Green Assets and Capital Expenditures qualifying under the EU Taxonomy criteria

Klépierre assesses the alignment of its turnover, Capital Expenditures and Operational Expenditures against the EU Taxonomy and reports annually on this in its Universal Registration Document, including a description of the underlying methodology and a review of the results by a qualified independent third party. As a subsidiary of Klépierre and fully integrated into the Group, this assessment also extends to Steen & Strøm's assets.

The Taxonomy alignment assessment includes demonstrating the alignment of Eligible Green Assets and Capital Expenditures with relevant substantial contribution for climate change mitigation, Do No Significant Harm (DNSH) and Minimum Safeguards criteria. Details on the policies carried out by Klépierre to demonstrate alignment with the main applicable substantial contribution and DNSH criteria are provided in Appendix 1.

Regarding the Minimum Safeguards criteria, Klépierre has defined policies and put in place processes to ensure high standards of business ethics, including Klépierre's Anti-corruption Code of Conduct, an adequate whistleblowing mechanism and strong communication efforts towards internal and external stakeholders, which are also applicable to Steen & Strøm. To further enhance its monitoring process, Klépierre formalized its Human Rights Risk Mapping in 2023, enabling more precise tracking of human rights issues.



3) MANAGEMENT OF PROCEEDS

Steen & Strøm will manage the net proceeds of the green finance instruments issued under the Framework on a portfolio basis, meaning that an amount equivalent to the net proceeds of Steen & Strøm's green finance instruments outstanding will be earmarked for allocation to the Eligible Green Portfolio, as validated by the Green Finance Committee. A loan or a tranche of a loan will only be labelled as green if an equivalent amount of net proceeds from that loan or tranche is allocated to the Eligible Green Portfolio. The allocation will be tracked and reported in line with the Framework. The Corporate Finance department will ensure that the proceeds raised by the aggregated amount of green financing is lower than the outstanding amount of the Eligible Green Portfolio. Eligible Green Assets will be included in the Eligible Green Portfolio at their appraisal value. The Eligible Green Portfolio will be tested every year.

Steen & Strøm intends to fully allocate the proceeds of issued green finance instruments within a timeframe of no more than 24 months after issuance. Pending the allocation of the net proceeds of issued green finance instruments to the Eligible Green Portfolio, or where there are insufficient Eligible Green Assets and Capital Expenditures available, Steen & Strøm has undertaken to temporarily place the unallocated proceeds in the liquidity reserve, in line with its treasury criteria and excluding any investments towards environmentally and/or socially harmful activities.

Should any Eligible Green Asset or Capital Expenditure be subject to major controversies, cease to comply with the Eligibility Criteria or be divested, Steen & Strøm will remove it from the Eligible Green Portfolio and use its best efforts to substitute it if needed as soon as is feasible and within 24 months.



4) REPORTING

Reporting on the allocation of proceeds of green finance instruments and the Eligible Green Portfolio's positive impacts will be available on the Financing section of Steen & Strøm's website each year, starting from the first year following the issuance of any given green finance instrument and as long as the green finance instruments are outstanding.

Allocation Reporting

Allocation reporting will include the following information:

- The total outstanding volume of green finance instruments issued under the Framework;
- The size of the Eligible Green Portfolio, including a breakdown per Category;
- A breakdown per Eligible Green Assets and Capital Expenditures category aligned with the EU Taxonomy;
- The value of unallocated proceeds (if any);
- The share of financing vs. refinancing and the average look-back period of the portfolio.

Impact Reporting

To promote transparency and contribute to the harmonization of impact reporting methodologies, Steen & Strøm intends to align its impact reporting with the ICMA Harmonized Framework for Impact Reporting (June 2024). Where possible, the impact reporting will provide information on the Eligible Green Portfolio based on the impact indicators provided in the table on the next page.

In addition to these impact indicators, the impact reporting will refer to risks stemming from project-related controversies (if any) and may provide an estimation of adverse environmental and social impacts related to the Eligible Green Portfolio and how these are managed and mitigated by Steen & Strøm.

4) REPORTING

Category	Potential output indicators	Potential impact indicators
Green buildings	<ul style="list-style-type: none">• Number of eligible Green Buildings, and sq.m. data• Green Building certification levels• Energy Performance Certificate (EPC) labels• Energy intensity expressed in kWh/sq.m./year• Carbon intensity expressed in kgCO₂e/sq.m./year	<ul style="list-style-type: none">• Estimated annual GHG emissions avoided (tCO₂e)
Renewable energy	<ul style="list-style-type: none">• The total installed capacity (in MWp)• The total annual generation of renewable energy (in MWh)• Number of assets equipped	<ul style="list-style-type: none">• Estimated annual GHG emissions avoided (tCO₂e)
Clean transportation	<ul style="list-style-type: none">• The number of implemented EV charging stations• Share of shopping centers equipped with EV charging stations• Number of shopping centers equipped with bicycle parking stations	<ul style="list-style-type: none">• Estimated annual GHG emissions avoided (tCO₂e)

External review

Pre-issuance verification

ISS ESG has provided a Second Party Opinion (SPO) on this Green Financing Framework, verifying its alignment with the ICMA Green Bond Principles (as of 2025), and the LMA's Green Loan Principles (as of 2025).

Post-issuance review

An independent external party, appointed by Steen & Strøm, will on an annual basis, until full allocation and in the event of any material developments, provide a review confirming that an amount equal to the net proceeds has been allocated to Green Assets and Capital Expenditures. The external verification will also cover the Impact Report.

Publicly available documents

The Framework and the SPO will be publicly available on Steen & Strøm's website, together with the post-issuance review and the reporting, once published.





Appendices

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Appendix 1: Applicable Technical Screening Criteria for Climate Change Mitigation

Substantial contribution criteria	Applicable activities	Main criteria	Steen & Strøm's alignment policies
Climate change mitigation	7.7	<ul style="list-style-type: none"> For buildings built before year-end 2020, the building has at least an Energy Performance Certificate (EPC) class A or is within the top 15% of the national or regional building stock expressed as operational Primary Energy Demand (PED). For buildings built after year-end 2020, the PED is at least 10% lower than the threshold set for nearly zero-energy buildings (NZEB). The energy performance must be certified using an "as built" EPC. For buildings > 5,000 sq.m., the building undergoes testing for air-tightness and thermal integrity, and the lifecycle Global Warming Potential (GWP) of the building has been calculated for each stage in the lifecycle and is disclosed to investors and clients upon request. Where the building is a large non-residential building, it is efficiently operated through energy performance monitoring and assessment. 	<ul style="list-style-type: none"> To demonstrate that buildings are efficiently operated, Steen & Strøm uses the monitoring tool Deepki for the energy consumption of 100% of its assets in value, and all its assets are equipped with a Building Management System (BMS) to supervise the daily functioning of equipment. Steen & Strøm's methodology for assessing compliance with this criterion is based on Klépierre's EU Taxonomy assessment methodology. It compares the primary energy intensity of each shopping center against Deepki's ESG index, using European values on average primary energy intensity for buildings comparable with Steen & Strøm's portfolio.

DNSH requirements	Applicable activities	Main criteria	Steen & Strøm's alignment policies
Climate change mitigation	7.7	<ul style="list-style-type: none"> Physical climate risks must be identified. Where the activity is assessed to be at risk, a climate risk and vulnerability assessment must be carried out. Adaptation solutions must be identified for the most important physical risks (up to five years) and supported by action plans. 	In 2022, Klépierre commissioned a study to identify its main climate, physical and transition risks and opportunities as well as their impact on its activities. Each asset's exposure, including Steen & Strøm's assets, and impacts on Klépierre activities have been assessed based on scenarios consistent with the IPCC (SSP 4-5 and 8-5) and the TCFD. The study evaluated the likelihood and impact of ten physical risks over various time horizons (2030 and 2050) and led to the identification of the most vulnerable assets for each physical climate risk. The results of the study are disclosed in Klépierre's annual report.

Appendix 2

The table below outlines energy intensity pathways provided by CRREM (Carbon Risk Real Estate Monitor), which are aligned with achieving net-zero emissions by 2050 for shopping centers in the Nordic countries where Steen & Strøm operates.

Energy intensity pathways aligned with 1.5°C for Nordic shopping centers (kWh/m² per year)												
	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Denmark	201.6	190.2	179.5	169.4	159.9	150.9	142.4	134.4	126.9	119.7	113	106.7
Norway	196	190.4	185	179.8	174.6	169.7	164.8	160.2	155.6	151.2	146.9	142.7
Sweden	229.9	216.2	203.3	191.2	179.8	169.1	159	149.6	140.6	132.3	124.4	117