

Sustainability report 2022





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1. Velfra

Based in Oslo, Velfra is a long-term owner of critical social infrastructure assets within health, care and education in Norway. Velfra leases specialist properties on long-term contracts to a range of operators of assisted living & habilitation (ALH), rehabilitation centres, preschools, schools and is owned by two leading infrastructure funds, Nordic-based Infranode and Netherlands-based DIF Capital Partners (DIF). Velfra currently owns 50 single-user assets with a total area of approx. 52 000 sqm. The portfolio is managed by Velfra's managing director and with the assistance of Newsec Basale, which is responsible for the day-to-day technical follow-up of our assets. As a responsible investor and based on personal commitment and the expectations and demands from our investors, Velfra has a strong focus on ESG and is committed to contribute to decarbonization, environmental and social sustainability.

1.1 ESG strategy

Velfra has the strategic objective to achieve outstanding ESG performance with the following tactical objectives and operationalization of the strategy concerning ESG.

Tactical objective	Operational focus / measures
Take environmental	Energy efficiency
responsibility	 Use suppliers with environmental certifications
	 Reduce environmental impact of transport
	 Encourage reuse of building materials
Take social responsibility	 Combine maintenance with social responsibility
	 Yearly sponsoring of social entrepreneurship
	 Pursue and use market power to achieve a diverse and
	inclusive culture
High corporate governance	 Conduct business with highest degree of ethics and
standards	integrity
	 Up-to-date corporate manual
	Transparency
	 Use professional suppliers with a transparent
	subsupplier structure
	 GRESB – reporting
	Act on Transparency
Minimize HSE risk	 Quarterly HSE-reporting
	 HSE-focus in tenant dialogue
	 Assess additional HSE-measures for highest risk assets
	 Regular inspections of tenants' HSE obligations

Table 1: ESG objectives and measurements

1.2 Sustainability through our customers

In addition to Velfra's own direct sustainability initiatives, our customers play a significant role with regards to UN development goals good health and well-being, and quality education. Within assisted living & habilitation, people with mental and/or physical difficulties or disability are provided with a home and support customized for their needs. Within our rehabilitation centres, people who have undergone surgery or sickness are trained to speed their recovery. In our schools and preschools, children and youth receive high quality education in a safe environment to develop them as individuals and to reach their full potential.

2. Focus areas 2022

Sustainable development is a common social responsibility. Velfra contributes through its core business, with property leasing to health care, schools and kindergartens. To ensure transparency and facilitate for safe and forward-looking operations, Velfra has during 2022 conducted a variety of assessments regarding sustainability themes. As the term sustainability refers to a variety of themes, aspects, and initiatives, some of the chapters following overlaps or complements each other.

2.1 Sustainability reporting (ESG)

Sustainability reporting is a way of communicating environmental, social and governance (ESG) progress and goals. There are several ways sustainability can be reported and measured, such as through assessment portals and validated independent organizations. Velfra has in 2022 reported on sustainability in GRESB (Global Real Estate Sustainability Benchmark), for DIF and to Velfra's Lender. These reporting forms are shortly described below:

- GRESB is an independent organization and provides validated ESG performance and benchmarks with the goal of improving business sustainability. Velfra started with their GRESB-reporting in 2021. GRESB differentiates on asset types, where Velfra is categorized as Social Infrastructure. GRESB-reporting works as a survey with questions and documentation requirements to gather information on the company's ESG performance. In this survey, future goals and measures is also included to facilitate continuous improvement on sustainability.
- DIF Capital Partners is a global infrastructure investor. DIF collaborated with consultant from the Environmental Resource Management (ERM) to create the DIF ESG Path assessment, which is designed to annually evaluate the current ESG performance of companies. This comprehensive survey includes both qualitative and quantitative KPIs, such as greenhouse gas (GHG) emissions, which is one of the KPIs that Velfra has provided as part of the assessment.
- **Lender** ESG-survey was prepared and distributed. Velfra contributed to its Lender's increasing sustainability focus and performed the survey on ESG. This survey was only intended for internal usage.

2.2 Data collection

Velfra has conducted an extensive data collection exercise for the calculation of our footprint as a starting point and guidance with regards to future objectives and measures for reducing energy consumption and greenhouse gas emissions.

- Velfra collects electricity consumption data from all our assets through the digital meters and the public portal Elhub
- Velfra collects additional manual data from our customers with regards to other energy consumption, waste and HSE
- Velfra has started collecting detailed data as energy consumption, transport, HSE, waste and environmental product declarations from larger maintenance projects for calculation of CO₂e footprint
- Velfra has started collecting automatically generated data on waste from our larger assets from waste management companies.

To further streamline data collection is crucial when it comes to succeeding in achieving environmental objectives and Velfra supports all public and private initiatives to automize and simplify this process.

2.3 Climate risk

Carbone4 has conducted a physical risks analysis of Infranode portfolio fund 1, including Velfra's property portfolio. The analysis follows the CIARA methodology, which covers ten hazards included in the taxonomy, but also a complementary analysis to cover the rest of the relevant hazards. For physical climate risks, it was found that the only high, future risk is the risk of heavy blizzard conditions. This might lead to severe damage on roofs, in addition to drafts, plumbing issues, door frame rotting and foundation cracking. Historic risks also show that cold waves and heavy snow has been a hazard previously. Climate risk is one of the themes reported in ESG.

2.4 Carbon footprint

As a part of the ESG reporting, Velfra has established a carbon footprint of the company (GHG account). The carbon footprint is developed in line with the internationally recognized *GHG Protocol.* The calculated emissions are presented in Table 3. The GHG protocol divides the emissions into "scopes", depending on where in the value chain emissions have occurred. The full carbon footprint for 2021 and 2022 is listed in Appendix 1.

As Velfra has no internal productions, only 1 employee and the only car used is an electrical vehicle, Velfra has no emissions from scope 1 (direct emissions). Scope 2 emissions, from electricity and district heating in the Velfra office are fairly low, visualized in Figure 1.

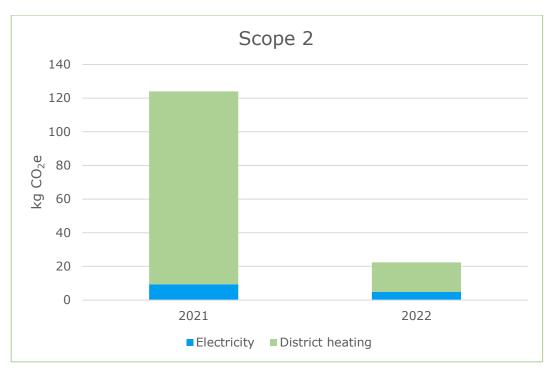
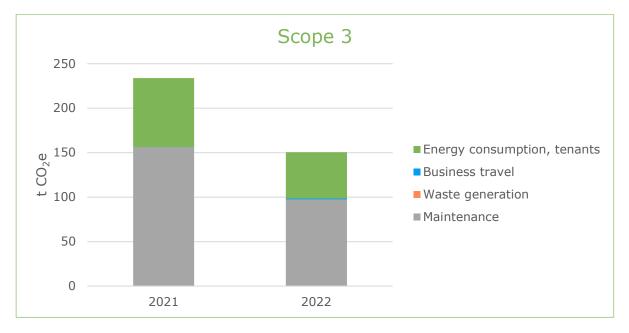


Figure 1: Calculated carbon footprint of scope 2, energy consumption [kg CO₂e]

There has been a decrease in energy consumption at the Velfra office from 2021 to 2022, which has led to emission reductions from both district heating and electricity. The emissions from district heating are additionally lower due to a change in emission factor. In 2021, an average emission factor for Norway was used, whereas a local emission factor for Oslo district heat was applied in 2022. The overall emissions from scope 2 in 2022 is estimated to 22,4 kg CO₂e. Indirect emissions, emissions that occurs geographically elsewhere, such as during production of a product, are placed in scope 3. Scope 3 emissions are shown in Figure 2. The largest share of emissions is generated by maintenance of the Velfra properties. Energy consumption from the same asset are also significantly contributing to the emissions. Emissions from business travel is



the only increase from 2021 to 2022, due to longer flights. Waste generation at the Velfra office is negligible compared to the other activities.

Figure 2: Calculated carbon footprint of scope 3, emissions from the value chain [t CO2e]

Emissions from maintenance of the leased assets seems unrealistically high. These emissions are calculated using economical results, based on average emissions from the construction industry. It does not take into consideration that most of the money spent on maintenance is in fact wages for the hired employee, and not actual building materials. Thus, it is assumed that this emission factor is unsuitable for the purpose of refurbishing and maintenance. In order to establish a robust and realistic carbon footprint, Velfra has begun the work of preparing a new emission factor adapted to the actual conditions. The new emission factor is made by calculating emissions from real projects based on the purchases, energy consumption and EPDs. Subsequently, emissions per NOK can be used as emission factor.

A full carbon footprint for all economic activites in 2022 can be found in Appendix 1. Only emission sources that have been calculated for both years are visualized in Figure 1 and Figure 2. In 2022 Velfra started investigating the possibilities to become net zero for scope 1 and 2. To make up for the relatively small emissions from energy consumption in the Velfra office, the plan was to produce the same amount of electricity on one of the assets in the Velfra portfolio using PV panels. However, because the office and the potential asset is not located on the same property, the emission reduction from PV production would therefore count as a scope 3 reduction instead of scope 2. Velfra has started a dialogue with the Norwegian Green Building council on the matter, but with the current energy regulations it seems difficult to become scope 1 and 2 net zero on paper. Velfra wants to keep focus on measures with actual emission reductions rather than measures that will only reduce emissions on paper. Thus, Velfra has not yet looked into certificates of origin, but this might be a necessary step in the future to reach net zero.

2.5 Energy assessments

During 2022, Rambøll has assessed the energy efficiency of four buildings which are leased to Unicare. The four buildings are Unicare's rehabilitation centers at Rykkinn, Hokksund, Steffensrud and Moss. Main purpose of the analyzes has been to map the existing building stock in order to

find good energy saving measures. As a result, a report has been prepared with calculation of possible energy savings and associated profitability for the different measures. In addition, a recommendation has been made regarding certain measures linked to operating routines. They have not been quantified with exact numbers but may provide better control over energy use and thus form a basis for future energy savings.

Additionally, Velfra has conducted a benchmark analysis of energy consumption in our Assisted living and habiltation assets, to identify which assets to prioritize for energy efficiency measures.

2.6 Social responsibility

Velfra is committed to contributing to an environment where all people are included, treated with dignity and respect. We aim to promote diversity and inclusion through our business. Velfra is committed to always being an inclusive company that welcomes people with all backgrounds. Velfra aims to create a work environment both internally and externally where all differences are valued.

Velfra has the following commitment with regards to social sustainability:

- Follow and promote national and fair wage requirements
- To ensure effective systems and policies are in place to prevent and eliminate modern slavery
- Be fully committed to the health and safety of our own staff and the staff of our suppliers and their sub suppliers
- To promote professional skills development and to promote employment of people with disabilities and/or special needs
- To demonstrate positive social impact and responsible procurement practices
- Promote diversity and inclusion

Velfra has since 2021 been a sponsor of Mental Helse Ungdom ("MHU"), a member-based interest organization for children and young people up to 36 years of age. MHU work for increased openness about mental health, prevention of mental disorders and a better mental healthcare service.

Velfra has since 2021 used the social initiative Pøbelprosjektet for smaller maintenance tasks in our portfolio. Pøbelprosjektet aims to get young people who, for one reason or another, are outside the established school system and working life - into work or further education.

With regards to gender equality, Velfra has only one employee – which is male. In Velfra's board there are 3 female and 2 male board members.

2.7 Working conditions

Velfra is a small company and does not perform field work or physical challenging tasks. However, Velfra has an agreement with Newsec, which manage, tender and carries out repair work and refurbishment projects on Velfra's leased properties. Thus, the work ethics in Newsec is important for Velfra's impact through the supply chain. Newsec is certified by ISO 14001:2015 and ISO 90001:215, is a member of the Norwegian Green Building Council and has a clear internal anticorruption guideline with a whistleblowing system. In relation to developing the new emission factor on property maintenance, Velfra now demands a report from every project, including both environmental, social and economical data. Thus, Velfra takes an active part in ensuring that Newsecs high standards are sustained in its projects.

2.8 Health and safety

Velfra is committed to the health and safety of our own staff, the staff of our suppliers and their sub suppliers. The suppliers must comply with all applicable international and national laws and

directives related to health and safety in the workplace. In addition, the following applies (not an exhaustive list):

- All employees must be informed about potential safety or health risks in their work.
- Employees must be offered health services and covered by personnel insurance that is relevant to the job they will perform.
- Appropriate work and protective equipment must be provided for the employees.
- Written safety instructions must be available to all employees.
- Service providers and suppliers must register all accidents, incidents and hazards, and implement measures to ensure proactivity and minimize the risk of injury and accident.
- Deliveries must be carried out in a safe manner and in accordance with Norwegian legislation.

Identified deviations are followed up swiftly and reported/known accidents and incidents are reported as part of Velfra's HSE reporting.

Velfra is not the least committed to health and safety of the users of our assets. Fire safety and physical hazard at the assets shall be always be at the of our priority list. Velfra is regulary inspecting our assets and controlling our customers duties when it comes to internal control, service on fire safety installations, escape routes etc. In 2022 Velfra has with the help of Newsec implemented a facility management system for more systematic follow-up and control of HSE-obligations. Furthermore Velfra has carried out electrical inspections of all ALH-assets to identify potential non-conformities and closed identified deviations.

2.9 Customer satisfaction survey

Velfra annually measures customer satisfaction with the assistance of The Norwegian Tenant Satisfaction Index (Norwegian abbreviation: NLI). This is the largest customer satisfaction benchmark for commercial real estate leasing in Norway, and, combined with its Swedish sister survey, also the largest in Scandinavia. It measures the tenant portfolios of landlords and property managers and help align the deliveries towards customers.

The 2022 survey was sent out to 47 contact persons from our 5 tenants, with a response rate of 77 %. The score ended at an average of 74, compared to 62 in the 2021 survey.

2.10 EU Taxonomy

Infranode has completed an EU Sustainability Taxonomy Analysis screening of the Velfra portfolio. The first part of an EU Sustainability Taxonomy analysis is to determine if the company conducts any of the activities that the EU Sustainability Taxonomy currently covers. This is called the eligibility analysis. Non-eligible business activities refer to those that are not yet covered by the EU Taxonomy i.e., no criteria have yet been established by the EU to assess whether an activity is sustainable or not. It is our assessment that 100 % Velfra's turnover is eligible.

The second part of an EU Sustainability Taxonomy assessment is to assess whether the eligible activities meet the alignment criteria to determine whether they are sustainable (=aligned). At an activity level (including specific facilities), the associated turnover is either fully aligned, or not aligned. Based on the information we have reviewed we have been able to classify 0.7% of the turnover as fully aligned with the EU Sustainability Taxonomy. Out of the 54 properties that have been assessed, only two buildings meet the energy efficiency requirements to be aligned. In order to improve the alignment score, energy efficiency measurements must be implemented.

3. Further work

Velfra has begun planning for the future, as reducing the impact on society requires a continuously effort. Some of the initiatives are especially aimed at increasing Velfra's positive impact on economic, social and environmental sustainability. Other initiatives are adapted to the two investors, Infranode and DIF, in order to create more transparent value chains. This chapter outlines the activities set to 2023, although the reporting initiatives also includes the activites already completed in 2022.

3.1 Sustainable Finance Disclosure Regulation

As a part of the European Green Deal and the increasing regulatory requirements related to the real estate sector, it is an ongoing discussion on which frameworks Velfra should report on. Chapter 2.1 is an example of this. The Sustainable Finance Disclosure Regulation (SFDR) is a regulation that some of Velfra's investors are already reporting on and could potentially be mandatory for Velfra in the future. Infranode is collecting relevant information from their investee objects from 2022. Velfra's relevant indicators are attached in Appendix 2.

3.2 Net Zero strategy

As mentioned in chapter 2.4, a carbon footprint assessment has been done for Velfra. Based on this carbon footprint, a climate strategy for reaching net zero was proposed to the board in May 2022. A first draft of the net zero strategy is shown in Figure 3. As the baseline needs to be calculated with a more accurate emission factor for operation and maintenance of the property portfolio. Subsequently the net zero strategies need to be updated in accordance. Velfra is dedicated to first and foremost reducing its environmental impact, and in this case its GHG emissions. To be formally net zero scope 1+2 according to the GHG protocol will come second to real reductions.

Action	Timeframe	Status
Map current emissions	2022	
Decide on a science based climate strategy	2023	
Calculate a robust baseline	2023	
Local energy production	2024	\bigcirc
Reach net zero scope 1 + 2	2024	
Offset / buy carbon credits (if necessary)	2028	
Reach net zero scope 1 + 2 + 3	2030	

Figure 3: Climate strategy for Velfra towards net zero

3.3 Circular economy

Velfra has very limited development activity and is therefore not a large consumer of building materials. That said, Velfra aspires to contribute to the transition into a circular economy through selecting sub-suppliers, that encourage reuse of materials and to choose long-lasting reusable

materials. Furthermore, Velfra aims to maintain our portfolio proactively, with the objective of reducing the long-term need for replacing building materials.

3.4 New energy efficiency requirements

As a consequence of the EU green deal and the new regulations there are a both uncertainties and rapid developments in different existing laws and requirements. One that might have a substantial effect on Velfra is the "Energy performance of buildings directive" from EU, which could require increased energy performance of the Velfra properties. To reduce energy consumption from the assets could thus be legally required, in addition to being an important climate mitigation measure. This needs to be further looked into in 2023, and should draw upon the work done with the energy assessment, described in chapter 2.5.

3.5 Measured progress

In order to secure a continuous improvement towards real sustainable development, Velfra has established several key performance indicators (KPI's). These are tracked annually, aiming to increase the positive impact on society. Some of the KPI's are also reported in the GRESB assessment, which is further explained in chapter 2.1.

Goal	Key performance indicator	Score 2021	Score 2022	Comment
Improve overall ESG impact	GRESB Score > 75	70		Improve the overall GRESB score
Net Zero operations	Local energy production > 1 100 kWh	0 kWh	0 kWh	First step towards climate neutral operations (scope 1 + 2)
HSE-accidents last 12m	Fatalities and injuries with minimum 1 day absence among own staff and contractors/subcontractors working with maintenance or facility management on our properties or general management of our portfolio (Norw: H1) Fatalities or severe injuries among users of our assets related to HSE-regulations for the building (for example fires)	0	0	Long-term objective of < 1
HSE-incidents last 12m	Near miss fatalities in our assets related to HSE-regulations for the building Reported or known significant injuries with medical treatment among staff or users of our assets. The injuries need to be somehow related to HSE-regulations for the building.	1	3	Long-term objective of < 2

Table 2: KPIs for sustainable development

Social responsibility initiatives	Number of initiatives and partnerships last 12m connected to Velfra's social responsibility commitments	2	2	Long-term goal of > 2
Ongoing energy efficiency projects	Number of projects last 12m connected to Velfra's enviromental responsibility commitments	3	3	Long-term goal of > 2
Customer satisfaction	CSI score (0-100)	62	74	Long-term goal of > 75

3.6 Transparency Act

In 2022, the Trancparancy Act (Åpenhetsloven) was implemented in Norwegian law, in order to promote enterprises' respect for fundamental human rights and decent working conditions and their impact through own operations and value chain. The Act applies to larger Norwegian enterprises or enterprises that offer goods and services in Norway.

The Transparency Act is meant to ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions. However, because the Act will apply to a variety of different companies, it is intended to be adaptive. Due diligence shall be carried out regularly and in proportion to the size of the enterprise, the nature of the enterprise, the context of its operations, and the severity and probability of adverse impacts on fundamental human rights and decent working conditions. Thus, for Velfra, a updated mapping of potential risks is on the agenda for 2023.

Appendix 1 GHG emissions

All calculated emissions are listed in the table below. Table 3 includes emissions from consultancy and lawyers as well. These were not included in the figures in chapter 2.4, because they were not calculated in 2021. The main reason for increased scope 3 emissions from 2021 to 2022 is the inclusion of more emission sources, such as emissions from consultants, lawyers and software.

Scope	Element	Overall asset	Overall asset
		emissions	emissions
		2021	2022
1	Stationary combustion	0 kg CO ₂ e	0 kg CO ₂ e
L	Mobile combustion	0 kg CO₂e	0 kg CO ₂ e
2	Electricity	9,4 kg CO₂e	4,8 kg CO₂e
2	District heating	114,6 kg CO₂e	17,6 kg CO2e
1 + 2	Total scope 1+2 emissions	124 kg CO ₂ e	22 kg CO₂e
	Maintenance	156 t CO ₂ e	97 t CO ₂ e
	Consultant hours	-	128 t CO ₂ e
	Lawyer hours (Refinancing fees)	-	166 t CO ₂ e
	Waste generation	0,6 kg CO₂e	4,9 kg CO₂e
2	Audit	-	9,8 t CO ₂ e
3	Insurances		4,4 t CO ₂ e
	Business travel	0,1 t CO ₂ e	1,1 t CO ₂ e
	Software and IT	-	2,2 t CO ₂ e
	Energy consumption, tenants	77,6 t CO ₂ e	51,9 t CO ₂ e
	Waste generation, tenants	-	4,3 t CO ₂ e
3	Total scope 3 emissions	234 t CO2e	466 t CO₂e

Table 3: Calculated GHG emissions for Velfra in 2021 and 2022. Note that scope 2 emissions are given in kg, while scope 3 emissions are given in tons

Appendix 2 Infranode: SFDR PAI

Infranode, one of Velfra's main investors is subject to the sustainable finance disclosure regulation (SDFR). Velfra, as an investee object, must report on Infranode's selected principle adverse impact indicators (PAIs). These are attached in Appendix 2.

Category	No.	Question	Guidance	GRESB indicator	Unit	Full Year 2022	Targets for 2023	Comments and explanation on absence of answers
	1.1	Total energy imported or purchased	This includes all energy that originates off- site, e.g., biomass, electricity, and natural gas. This metric is aligned with GRESB EN1 - see the GRESB Infrastructure Asset Assessment reference guide for additional guidance.		MWh	8 834	0	Biooil + electricity + district heat (Scope 1-3)
	1.2	Share of renewable energy in the imported or purchased energy	This relates to question 1.1. Specify in the comment what exactly is counted as renewable. Biomass (all fractions) is currently considered renewable, while municipal waste is not. This metric is aligned with GRESB EN1 - see the GRESB Infrastructure Asset Assessment reference guide for additional guidance.		%	98 %	0 %	Norway has approx. 98 % renewable energy in the national grid. However, Velfra does not have certificates on origin.
Energy and GHG emissions	1.3	Total energy input not imported/purchased	This includes all energy that originates on- site (i.e. not purchased/imported), e.g., from Solar PV, geothermal, hydroelectric etc. Please do not include the output from transformation of the energy included in 1.1 (e.g., heat/electricity from incineration of imported biomass). This metric is aligned with GRESB EN1 - see the GRESB Infrastructure Asset Assessment reference guide for additional guidance.	EN1	MWh	0	0	
	1.4	Total energy exported/sold	Sold to end customer or sent to the grid. This metric is aligned with GRESB EN1 - see the GRESB Infrastructure Asset Assessment reference guide for additional guidance. Exported energy (1.4) = imported energy (1.1) + on-site energy (1.3) - energy consumed by the entity, or otherwise lost.		MWh	0	0	
	1.5	Share of renewable energy in the energy sold	This relates to question 1.4. Specify in the comment what exactly is counted as renewable. This metric is aligned with GRESB EN1 - see the GRESB Infrastructure Asset Assessment reference guide for additional guidance. The intention is to		%	0 %	0 %	

			capture the share of the final output which stems from renewable energy.					
1.	.6	Scope 1 GHG emissions	Direct emissions from sources controlled or owned by the reporting entity. Do not include biogenic emissions (e.g., GHG emissions from biomass). Where relevant provide the biogenic emissions in the comment field.		tCO2e	0	0	
1.		Scope 2 GHG emissions	Indirect emissions from purchased or acquired electricity, steam, heating, or cooling used by the reporting entity (in other words, direct emissions of the energy generator that supplies the energy used by the entity). Use the "market based" approach if the entity has purposefully chosen renewable energy (electricity, steam, heating, or cooling), i.e. it is based on contractual instruments such as certificates of origin. If the company has not made any purposeful choices of energy sources, please use the "location based" approach: Market-based approach: A method to calculate scope 2 emissions, reflecting emissions from electricity that the entity has purposefully chosen (or their lack of choice). It derives emission factors from contractual instruments (definition based on the GHG protocol). Location-based approach: A method to calculate scope 2 emissions, reflecting the average emissions intensity of grids on which energy consumption occurs (using mostly grid-average emission factor data) (definition based on the GHG protocol) In the comment, indicate what approach has been used.	GH1	tCO2e	0,0022	0,00220	

	1.8	Scope 3 GHG emissions	All other indirect emissions that occur in the value chain of the reporting entity, both upstream and downstream. Specify in the comment what methodology and scope were used.		tCO ₂ e	466	20 790	
	2.1	Are any of sites/operations located in or near biodiversity sensitive areas?	See definitions in sheet "Biodiversity". Please provide the names of the sites and the affected biodiversity sensitive areas in the comments.	RC7	Yes/No	NO	NO	
Biodiversity	2.2	Are the activities of the sites/operations listed in 2.1 negatively affecting the biodiversity sensitive areas?	Question relevant in case the question 2.1. is answered with "yes". See definitions on the sheet "Guidance".		Yes/No	NO	NO	
	3.1	Total direct emissions to water of "priority substances"	See the list of "priority substances" in the sheet "Guidance".		Tonnes	0	0	Not relevant for Norwegian housing
	3.2	Total direct emissions of nitrates	-		Tonnes	0	0	
	3.3	Total direct emissions of phosphates	-		Tonnes	0	0	
Pollution	3.4	Total direct emissions of pesticides	-		Tonnes	0	0	
and material use	3.5	SOx emissions	SOx gases are mainly emitted during combustion. In case of uncertainty please refer to GRI 305-7 (2016).		Kg	0	0	
	3.6	NOx emissions	NOx gases are mainly emitted during combustion. In case of uncertainty please refer to GRI 305-7 (2016).	AP1	Kg	0	0	
	3.7	PM 2.5 emissions	Particulate matter (small droplets in the air of various diameter) can result from the burning of fuels or directly from industrial processes and/or construction. In case of uncertainty please refer to GRI 305-7 (2016).		Kg	0	0	

3.8	Hazardous waste generation	Includes construction and demolition waste, as well as any other hazardous materials resulting from production of goods and products, including radioactive waste. In case of uncertainty please refer to GRI 306-3 (2020). Specify in the comments what types of hazardous waste in included, and how it was disposed. Hazardous waste possesses any of the characteristics contained in Annex III of the Basel Convention (see sheet "Guidance"), or that is considered to be hazardous by national legislation.		Tonnes	0	0	
3.9	Non-recycled waste	Report the tonnes of waste which are not recycled i.e., which end in a landfill/backfill or incineration. Recycling means any recovery operation by which waste materials are reprocessed into products, materials, or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations.	WS1	Tonnes	131	0	Assumes that paper, glass, metals, food and porcelen are material recycled. Mixed waste, plastic, and health sector products are listed here. Only three tenants reported waste, thus this estimate is multiplied with the size of the other buildings. The share of waste generated from Velfra's own operations are neglible (see attatched carbon footprint)
3.10	Water use	Water drawn into the boundaries of the entity from all sources (including surface water, ground water, rainwater, and municipal water supply)	WT1	Megaliters	30	0	Estimate for parts of the portfolio, which has municipal water supply and no meters. Mean value multiplied with total amounts of properties.
3.11	Water recycling	Percentage of water recycled and reused by the company. This includes water and wastewater (treated or untreated) that has been used more than once before being discharged from the undertaking's boundary, so that water demand is reduced. This may be in the same process (recycled), or used in a different process within the same facility or		%	0	0	

			another of the undertaking's facilities (reused).					
	4.1	Has the company been involved in violations of UN and OECD Guidelines for Multinational Enterprises during the year?	Referred documents in the question: UN Global Compact principles; Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises Please provide any additional relevant information in the comments field.	RP2.1	Yes/No	NO	NO	
Social and employee	4.2	Does the company have related policies to monitor compliance, and grievance/complaints handling mechanisms to address violations of these principles/guidelines?	Referred documents in the question: UN Global Compact principles; Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises Please provide any additional relevant information in the comments field.	PO1, PO2, PO3, RM2.1, RM2.2, RM2.3, SE2, SE3.1, SE3.2	Yes/No	YES	YES	
matters	4.3	Average gross hourly earnings of male employees	Gross hourly earnings are the wages and salaries earned by full-time and part-time employees, per hour paid, before any tax and social security contributions are deducted. Wages and salaries include any overtime pay, shift premiums, allowances, bonuses, and commissions.	EM2	Currency/hour	N/A		Only 1 employee i company
	4.4	Average gross hourly earnings of female employees	Same as 4.3. but for female workers.		Currency/hour	N/A		
	4.5	Male board members	As of year-end.	EM2	#	2		
	4.6	Female board members	As of year-end.		#	3		
	4.7	Male employees	As of year-end.		#	1		

	4.8	Female employees	As of year-end.		#	0		
	4.9	Year of latest customer satisfaction survey	In the comment, please indicate any other relevant explanatory details.	CU1	year	2 022		
	4.10	Total number of customers	As of year-end. In the comment, please indicate any other relevant explanatory details.	OI1	#	5		
	4.11	Estimated number of people benefitting from the infrastructure service	Estimate a number of people that benefit from your infrastructure company. The estimation can be very rough e.g., as % of population of a town where your company operates. In the comment field, please specify briefly how you estimated this number, so we better understand it.		#	4 800		Based on the number of pupils, preschool children, patients and users of ALH actually using the assets
	4.12	Does the company have a <u>supplier</u> code of conduct?	A Supplier Code of Conduct is a statement of the behaviours which an organisation expects of its suppliers and their staff. The Code of Conduct must include unsafe working conditions, precarious work, child labour, and forced labour. If "No", please add a comment to the comment section regarding the reasons for not having it.	SE2	Yes/No	Yes		
	5.1	Number of fatalities as a result of work- related injuries	For direct employees only. Same instruction for all questions in section 5.		#	0	0	
Health & safety Employees	5.2	Number of lost time injuries (excluding fatalities)	Any injury, arising in the course of work, that results in temporary or permanent time away from work. Includes fatalities, permanent disabilities and injuries that have led to absence from work. Please provide the number of injuries, not the total hours lost due to the injuries.	HS1	#	0	0	

	5.3	Number of recordable work-related injuries (excluding fatalities and high- consequence injuries)	Recordable work-related injury: work-related injury or ill health that results in any of the following: days away from work, restricted work or transfer to another job, medical treatment beyond first aid, or loss of consciousness; or significant injury or ill health diagnosed by a physician or other licensed healthcare professional, even if it does not result in days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness. GRI 403-9a (2018). Please provide the total number of hours		#	0	0	
	5.4	hours worked	worked for the employees of the company.		hours/year	1 950		
Health & safety Contractors	6.1	Number of fatalities as a result of work- related injuries	For contractors only. Same instruction for all questions in section 6.	HS2	#	0	0	
	6.2	Number of lost time injuries (excluding fatalities)	Any injury, arising in the course of work, that results in temporary or permanent time away from work. Includes fatalities, permanent disabilities and injuries that have led to absence from work. Please provide the number of injuries, not the total hours lost due to the injuries.		#	0	0	
	6.3	Number of recordable work-related injuries (excluding fatalities and high- consequence injuries)	Recordable work-related injury: work-related injury or ill health that results in any of the following: days away from work, restricted work or transfer to another job, medical treatment beyond first aid, or loss of consciousness; or significant injury or ill health diagnosed by a physician or other licensed healthcare professional, even if it does not result in days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness. GRI 403-9a (2018).		#	1	0	
	6.4	Total number of hours worked	Please provide the total number of hours worked by contractors on behalf of the company.		hours/year	12 000		Estimate based on actual hours spent at Kirkelina 15 and Gamleveien calculated towards maintenance costs (spend-based)

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