

An aerial photograph of a city, likely Atlanta, Georgia, showing a mix of urban development and green space. A river flows through the city, with several bridges crossing it. In the background, there are industrial buildings and a tall smokestack. The foreground is dominated by a large, modern residential or commercial development with multiple interconnected buildings featuring brick and wood paneling. The sky is clear and blue.

AKROPOLIS

REAL ESTATE DEVELOPMENT &
MANAGEMENT COMPANY

Akropolis Group Green Finance Framework

February 2025

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1. Akropolis Group at a Glance

Akropolis Group, headquartered in Vilnius, Lithuania, continues to stand as the foremost shopping and entertainment centres' (SC) development and management company in the Baltic states for over 20 years.

Akropolis Group manages five shopping and entertainment centres: three in Lithuania – in Vilnius, Klaipėda and Šiauliai, and two in Latvia – Akropole Riga and Akropole Alfa in Riga, the capital city of Latvia. By offering relevant shops, services and entertainment to visitors, the centres controlled by Akropolis Group hold strong leadership positions in the cities in which they operate.

The Group (AKROPOLIS GROUP, UAB and its direct and indirect subsidiaries) is also actively developing new investment projects, including the expansions and renovations of existing shopping centres and potential development of Akropolis Vingis, which would be the Group's second project in Vilnius.

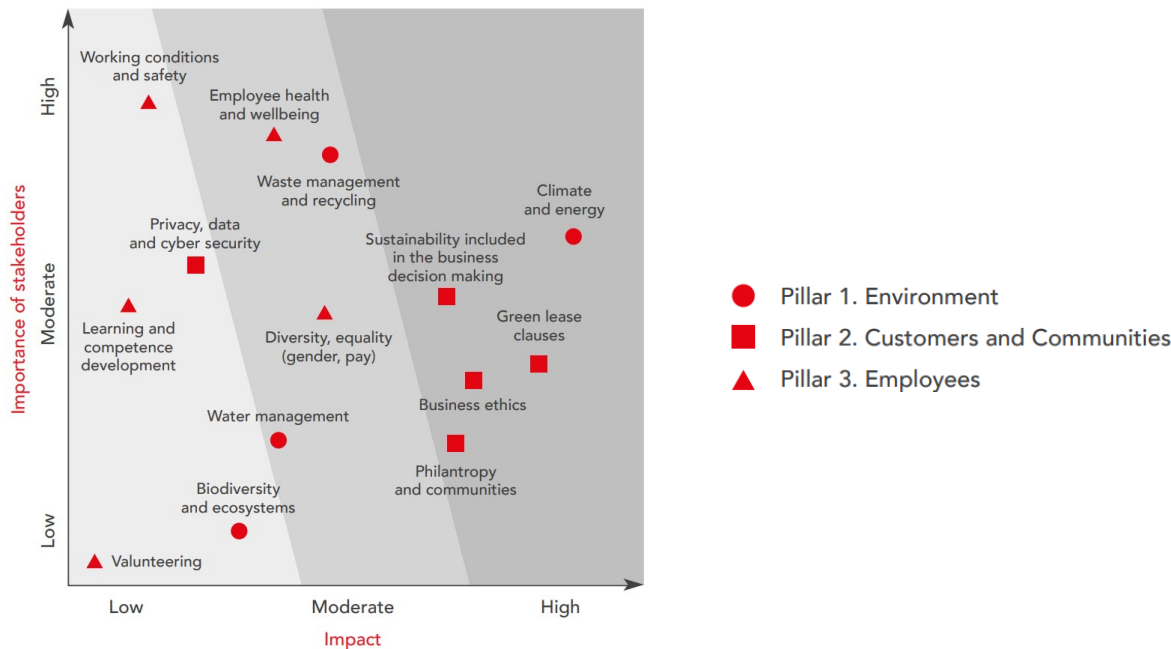


2. Akropolis Group’s Approach to Sustainability

Sustainable operation is the overarching goal of Akropolis Group, and Akropolis Group dedicate special attention to this endeavour. In developing and managing shopping and entertainment centres, Akropolis Group strives to be a responsible real estate manager and a reliable partner. By ensuring business ethics and transparency, promoting balanced urban development, and enhancing the well-being of visitors and tenants' employees, Akropolis Group acts as a responsible community participant. Additionally, Akropolis Group functions as a responsible employer by implementing equality and inclusivity, continuous growth, and improvement opportunities for its employees.

2.1. Materiality Analysis

The materiality matrix has served as Akropolis Group’s compass on the sustainability journey. It guided the identification of priority areas, marking the systematic attention to these focal points. In the future, a review of priority areas will be conducted based on the double materiality approach, and adjustments will be made as necessary to refine the sustainability strategy.



2.2. Environmental Commitments

Akropolis Group acknowledges the significant environmental footprint associated with its operations, particularly in energy consumption and transportation, which significantly contribute to climate change. Akropolis Group's commitment to tenants' and visitors' well-being requires substantial energy usage in Akropolis Group's SCs, and the way visitors get to the SCs also increases emissions. In 2023, the Group took a significant step towards environmental responsibility by conducting a thorough assessment of Akropolis Group's carbon footprint. Akropolis Group is committed to continue sharing its environmental impact with full transparency.

In response, Akropolis Group takes responsibility for managing and mitigating these impacts. Akropolis Group is dedicated to investing in resource-saving solutions and minimising environmental impact. Akropolis Group's commitment to responsible business practices extends beyond day-to-day operations, encompassing Akropolis Group's role as stewards of real estate assets. This commitment is guided by the principles outlined in the Group's Sustainability Policy, which sets specific targets and management strategies.

Moreover, Akropolis Group has set up intensity-based emission targets encompassing its Scope 1, 2, and 3 emissions. Akropolis Group commits to reduce Scope 1 and 2 GHG emissions per sq.m by 65% by 2030 compared to 2023 baseline year¹. Akropolis Group also commits to reduce its Scope 3 GHG emissions for Categories 5 and 13 per sq.m by 55% by 2030 compared to 2023 baseline year¹.

Energy

Akropolis Group's SCs require substantial energy due to the high level of in-use phase activity and the need for climate control to ensure the comfort of visitors, tenants, and employees. As such, Akropolis Group invests in decreasing the use of energy and enhancing energy efficiency such as:

- Replacing worn-out lamps with energy-efficient LED lighting across almost all five Akropolis SCs and encouraging tenants using worn-out lamps to adopt LED fixtures during refurbishment projects
- The utilisation of heat recovered from ice arena refrigeration machines
- Adjustment of the operating mode of circulation pumps in ventilation chambers (automatic shutdown when heating is not required)
- Balancing of supply and return airflows, ensuring comfort in tenants' premises
- Insulation of the glass facades
- Replacement of refrigeration machines
- Updating BMS systems

¹ per average portfolio gross leasable area square meter

Furthermore, Akropolis Group is planning to transition to 100% renewable energy and further expand EV charging stations at SCs (2024 performance: 65%).

Water

As part of Akropolis Group's enduring commitment to environmental sustainability, Akropolis Group places a strong emphasis on water conservation and responsible water usage management. Across Akropolis Group's SCs, water is sourced and managed through local municipal utility providers. Akropolis Group observes conscientious water usage, predominantly influenced by visitor activities in restroom facilities and the upkeep of premises and surrounding areas, including cleaning and landscaping endeavours. To achieve more rational consumption of water and to reduce ecological repercussions, Akropolis Group proactively invests in water-efficient fixtures and technologies, embracing solutions such as water-efficient faucets and eco-friendly toilet units.

Furthermore, through the integration of recommendations on green lease clauses, Akropolis Group endeavours to empower its tenants to monitor water usage and promptly report any potential plumbing irregularities.

In order to proactively address potential risks associated with water pollution, the Group conducts quarterly collection and laboratory testing of water samples. As part of Akropolis Group's internal control measures, tenants, who are the primary water users, submit lists of chemical agents used in their operations at Akropolis Group's request annually. The Group is consistently delivering on its commitment to water quality and regulatory compliance.

Furthermore, Akropolis Group's organisation is dedicated to implementing water-saving measures, particularly in common areas frequented by visitors. Akropolis Group prioritises installation of sensor-equipped plumbing fixtures to consume water responsibly. Additionally, Akropolis Group strives to provide accessible water drinking stations throughout its SCs, ensuring visitors have convenient access to hydration options.

Waste

The Akropolis Group recognises the detrimental impact of waste generation within its SCs and is committed to addressing this challenge. To promote sustainability, Akropolis Group actively advocates recycling initiatives among visitors, tenants, and employees. Throughout all SCs' alleys strategically positioned recycling bins for paper, plastic, and small electronics facilitate convenient waste sorting and disposal. Additionally, each SC is equipped with dedicated glass, plastic, and paper recycling containers exclusively for tenant use. Akropolis Group commits to reach waste recycling rate of 55% by 2030 (2024 performance: 49%).

Since 2022, significant enhancements were made to waste collection and sorting systems across selected SCs to ensure adherence to rigorous recycling standards. Regular communication and monitoring mechanisms are implemented to reinforce tenant compliance with recycling obligations. Furthermore, waste produced during construction, renovation, or fit-out activities – regardless of the organising party – is meticulously collected and transported to specialised construction waste collection sites.

Biodiversity and Ecosystems

Akropolis Group approaches its activities and their impact on the environment with great responsibility. Akropolis Group aims to develop a biodiversity policy and action plan to conserve and enhance biodiversity at all of Akropolis Group's properties by the end of 2026 and start implementing it during 2027. The potential construction of Akropolis Vingis would not only comply with national laws but also adhere to best BREEAM practices and requirements. In preparation for construction, old factory buildings were demolished, and contaminated soil was cleaned. Initially, the land plot had low ecological value, but it would be changed during the construction process. The potential construction of the multifunctional complex would enhance biodiversity and create green spaces. Using local plant species from the neighbouring Vingis Park, additional habitats for the ecological system, including fauna, would be established.

As the SCs controlled by the Group are located in urban areas, the damage to biodiversity is minimal and does not cause significant negative changes. Nevertheless, Akropolis Group constantly seeks ways to contribute to the preservation and flourishing of biodiversity:

- Investing in more sustainable operational solutions for SCs, such as water and air filters, strict waste sorting, control of chemical substance use, thereby reducing overall pollution and conserving resources
- Collaborating with city infrastructure planners and developers to make Akropolis Group's SCs more accessible by public and green transportation (bicycles, scooters, electric vehicles), thus reducing air pollution and noise
- Planning sustainable practices for the future, such as green roof installation, beekeeping on building roofs, installation of insect houses in SC areas, thus contributing to biodiversity conservation and air purification. Akropolis Group also collaborates with local nature conservation organisations in order to increase awareness of the importance of biodiversity.

Akropolis Group understands that operating assets can have certain indirect impacts on the environment, such as increased traffic and noise. However, Akropolis Group aims for its SCs to be designed and managed to avoid any negative impact on the environment and, conversely, through additional sustainable practices and initiatives, have a positive impact on biodiversity and adjacent ecosystems.

Certifications

Significant achievements reflecting Akropolis Group's commitment to sustainable practices and environmental impact reduction include the international "BREEAM In-Use" sustainability certification, rated at the "Very Good" level, awarded to Akropole Alfa shopping and entertainment centre in Riga in 2023. This certification marks the achievement of one of the Group's sustainability goals – all five Akropolis Group centres in Lithuania and Latvia are now certified according to the globally recognized "BREEAM" sustainability standard. Akropolis Group commits to achieve and maintain at least "BREEAM-in Use Very Good" (or equivalent) certification for all existing assets by 2030.

Another important recognition is the ISO environmental (ISO 14001) and occupational health and safety (ISO 45001) certifications earned by Akropolis Group for the activities of the holding company in real estate development, management, and leasing. These ISO certifications confirm Akropolis Group's compliance with rigorous

quality control and management, environmental, sustainability, and safe working environment standards that guide Akropolis Group's provision of services to its business clients and partners in Akropolis Group's daily operations.

In 2023, Akropolis Group has supplemented the internal rules of its shopping centres with recommendations to tenants regarding sustainable practices, aiming to have not only fellow travellers but also reliable companions on the sustainability journey.

2.3. Sustainability Governance

Sustainability is ingrained within the Group's governance structure through the development of the sustainability policy that harmonizes with Akropolis Group's values and strategic objectives. Given the direct impact of sustainability considerations on strategic decisions, such as the development of new shopping centres and the management of existing properties, both the CEO and the Board play main roles in overseeing sustainability-related management within the Group. They are actively engaged in crafting and endorsing sustainability policies, setting goals and targets, identifying and evaluating sustainability-related risks that could influence the Group's long-term viability, value creation and reputation.

At the helm of the Group's governance, the Board is responsible for steering the Group's strategic trajectory, with a keen focus on effective governance and sustainability. This encompasses setting sustainability-centric agendas for Board and shareholder meetings, ensuring alignment with strategic objectives, and collaborating with Senior Management to seamlessly integrate sustainability into core business strategies. The chairman diligently monitors progress toward sustainability targets, integrating these objectives into the fabric of the Group's identity and operations.

Moreover, the Sustainability Project Manager is empowered to assemble a dedicated sustainability team with cross-functional representation. The highest governance body ensures synchronization between sustainability reporting and overall business strategies by conducting materiality assessments to pinpoint and prioritize sustainability issues relevant to the business and its stakeholders.

2.4. Stakeholder Engagement

In Akropolis Group’s commitment to transparency and comprehensive stakeholder engagement, Akropolis Group have identified key groups pivotal to its operations as SCs developer and manager. Recognising the diverse interests and impacts associated with Akropolis Group’s business, Akropolis Group have categorised stakeholders into distinct groups to facilitate targeted communication and tailored strategies.

This strategic separation enables Akropolis Group to tailor its approaches, ensuring that each stakeholder group's unique needs and concerns are addressed effectively.

Stakeholder type	Stakeholder group
Internal Stakeholders	Employees Shareholders
External Business Stakeholders	Tenants Visitors Suppliers
External Financial Stakeholders	Investors and financing partners
External Societal Stakeholders	Public authorities (government, local authorities) Non-governmental organisations Local communities

Stakeholder input is crucial to Akropolis Group’s organisation's decision-making process, particularly in shaping Akropolis Group’s sustainability strategies and practices. To comprehensively understand the environmental and social needs of Akropolis Group’s stakeholders, in the beginning of 2023 Akropolis Group conducted a survey involving over 800 participants, including tenants, visitors, employees, shareholders, partners (service providers, banks), non-governmental organisations (NGO), community representatives. The feedback collected during the survey played a pivotal role in identifying and prioritising key sustainability areas for Akropolis Group’s attention and management. Akropolis Group’s current sustainability activities are aligned with priority topics that were reflected in the materiality assessment.

3. Rationale for Green Finance Framework

In alignment with the Akropolis Group’s broader sustainability strategy, Akropolis Group has established this green finance framework (hereinafter **“Framework”**) to be able to issue green finance instruments (hereinafter **“Green Finance Instruments”**) to finance and/or refinance projects which enable the transition to a low carbon and climate resilient economy.

Akropolis Group is committed to promoting sustainable business activities in the industry sectors and regions where the company operates in. By issuing Green Finance Instruments, the company will provide additional transparency around funded projects that carry environmental benefits. Akropolis Group hereby hopes to promote further investments into environmentally sustainable projects that will assist in reaching the targets set forth by the Paris Climate Agreement and the UN Sustainable Development Goals (UN SDGs).

In addition, Green Finance Instruments will help to diversify Akropolis Group’s investor base, to broaden dialogue with the existing investors and to contribute to the development of the green finance market.



4. Green Finance Framework

Under this Framework, Akropolis Group or any of its subsidiaries may issue Green Finance Instruments, which may include senior bonds, subordinated bonds, medium-term notes, promissory notes, commercial papers, loans, bonding lines, guarantee lines, letters of credit or other debt instruments to finance and/or refinance eligible green projects (hereinafter “**Eligible Green Projects**”) with a positive environmental benefit.

The Green Finance Framework is based on the:

- [ICMA Green Bond Principles 2021, including the updated Appendix I of June 2022](#)
- [APLMA/LMA/LSTA Green Loan Principles 2023](#)

The Green Finance Framework is presented through four core components:

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

The Green Finance Framework also follows the [ICMA Guidelines](#) regarding External Review for Green Bonds.






This Framework may, from time to time, be updated and be applied to any outstanding Green Finance Instrument issued by Akropolis Group following the date of publication of the updated framework. For instance, future changes to the ICMA Green Bond Principles, the APLMA/LMA/LSTA Green Loan Principles, and/or developments related to sustainable finance regulation may be implemented in future versions of this Green Finance Framework. Any future version of this Green Finance Framework will either keep or improve the current level of transparency and reporting disclosures, including the corresponding review by an external independent second-party opinion provider. For the avoidance of doubt, any future change to the eligibility criteria may not necessarily apply to Green Finance Instruments issued under this Framework.

4.1. Use of Proceeds

An amount equal to the proceeds from Green Finance Instruments issued by Akropolis Group will be used to finance and/or refinance, a portfolio of Eligible Green Projects as defined by the eligibility criteria (hereinafter “**Eligibility Criteria**”) in this Framework. Eligible Green Projects may include assets (hereinafter “**Assets**”), capital expenditures (hereinafter “**CapEx**”) and/or operational expenditures (hereinafter “**OpEx**”) associated with the Eligibility Criteria outlined below. Assets shall qualify for refinancing with no look-back period, while CapEx and OpEx will qualify with a maximum three-year look-back period.

In alignment with Akropolis Group’s broader sustainability strategy, the Eligibility Criteria contemplated under this Framework may directly contribute to the achievement of UN SDGs and EU Environmental Objectives.

Under this Framework, equity investments, such as acquisitions of majority or minority stakes, qualify only when they relate to “pure-play companies” with over 90% of revenues coming from green activities as outlined in the Eligibility Criteria below.

GBP/GLP Category	Eligibility Criteria	Contribution to UN SDGs	Contribution to EU Environmental Objective	EU Economic Activity Mapping
<p>Green Buildings</p> 	<p>Assets, CapEx, and/or OpEx associated with construction, renovation, acquisition and ownership of buildings:</p> <ul style="list-style-type: none"> Buildings that received at least one of the following certifications: <ul style="list-style-type: none"> BREEAM “Very Good” or above certification LEED “Gold” or above certification Buildings built before 31 December 2020 with at least an Energy Performance Certificate (EPC) class A or belonging to the top 15% of the local building stock based on Primary Energy Demand (PED) Buildings built after 31 December 2020 with energy performance lower of at least 10% than the local threshold set for Nearly Zero-Building (NZEB) regulation Refurbished buildings that achieve energy savings of at least 30% (improvement in actual reduction in primary energy demand) Buildings that have been refurbished meeting the criteria for major renovations under applicable building regulations² 	   	<p>Climate Change Mitigation</p>	<p>7.1. Construction of new buildings</p> <p>7.2. Renovation of existing buildings</p> <p>7.3. Installation, maintenance and repair of energy efficiency equipment</p> <p>7.4. Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)</p> <p>7.6. Installation, maintenance and repair of renewable energy technologies</p> <p>7.7. Acquisition and ownership of buildings</p>

² As set in the applicable national and regional building regulations for ‘major renovation’ implementing Directive 2010/31/EU. The energy performance of the building or the renovated part that is upgraded meets cost-optimal minimum energy performance requirements in accordance with the respective directive.

	<p>Assets, CapEx, and/or OpEx associated with installation, maintenance or repair of:</p> <ul style="list-style-type: none"> • Energy efficiency equipment³ • Charging stations for electric vehicles (EVs) in buildings and parking spaces attached to the buildings • Renewable energy technologies (on-site) and the ancillary technical equipment related to these technologies that includes: <ul style="list-style-type: none"> ○ solar photovoltaic systems; ○ solar hot water panels; ○ heat pumps contributing to the targets for renewable energy in heat and cool in accordance with Directive (EU) 2018/2001; ○ heat exchanger/recovery systems; ○ solar transpired collectors; ○ thermal or electric energy storage units. 			
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4.2. Process for Project Evaluation and Selection

Akropolis Group has established a clear decision-making process to determine the eligibility of the nominated Eligible Green Projects, in accordance with the description of the Eligibility Criteria in the Use of Proceeds section of this Green Finance Framework. Eligible Green Projects will be selected by a dedicated Green Finance Working Group (hereinafter “**Working Group**”) set up within Akropolis Group. The Working Group is formed by members of the finance and development team, accounting, legal, sustainability and other relevant business teams when necessary. The Working Group will meet at least on an annual basis.

The Working Group is also responsible for:

- Evaluating and selecting the Eligible Green Projects in line with the Eligibility Criteria as set out in the Framework, excluding projects that no longer comply with the Eligibility Criteria or have been disposed of and, in such case, replacing them

³ Where applicable, the measures comply with minimum requirements set for individual components and systems in the applicable national measures implementing Directive 2010/31/EU, and where applicable, are rated in the highest two populated classes of energy efficiency in accordance with Regulation (EU) 2017/1369 and delegated acts adopted under that Regulation.

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- Reviewing the content of Akropolis Group’s Green Finance Framework and updating it to reflect changes in corporate strategy, technology, market, or regulatory developments on a best effort basis
- Updating external documents such as Second Party Opinion and related documents from external consultants and accountants
- Overseeing, approving and publishing the allocation and impact reporting, including external assurance statements. Akropolis Group may rely on external consultants and their data sources, in addition to its own assessment
- Monitoring internal processes to identify known material risks of negative social and/or environmental impacts associated with Eligible Green Projects and appropriate mitigation measures where possible
- Liaising with relevant business finance segments and other stakeholders on the above

Furthermore, Akropolis Group has stringent processes in place to ensure compliance with official national and international environmental and social standards and local laws and regulations across all of its activities. These laws are monitored and enforced by the local authorities, amongst others as part of obtaining the necessary permits for new projects and infrastructure maintenance.

ESG Policies

Akropolis Group’s Environmental and Social Risk policies define minimum standards for all its activities, including those financed with the proceeds of Green Finance Instruments issued under this Framework. Below are some examples of relevant codes and policies:

- [Sustainability Policy](#)
- [Equal Opportunities and Diversity Policy](#)
- [Corruption Prevention Policy](#)
- [Code of Business Ethics of Vilniaus Prekyba Group of Companies](#)
- [Privacy Policy](#)
- [Violence and Harassment Prevention Policy](#)
- [Akropolis Group Principles of Ethical Communication and Procedures of Their Application](#)

Notably, Akropolis Group’s Sustainability Policy is aligned with international standards and guidelines, including:

- OECD Guidelines for Multinational Enterprise

- UN Guiding Principles on Business and Human Rights
- UN Global Compact

The Group's policies, approved by the CEO, are disseminated through Akropolis Group's internal document management system. All employees must confirm their familiarity with the policies, overseen by a dedicated person to ensure comprehensive understanding. The policies will undergo regular reviews to enhance their effectiveness and align with evolving sustainability challenges.

4.3. Management of Proceeds

An amount equal to the proceeds of Green Finance Instruments will be tracked and monitored through an internal tracking system. Akropolis' finance team will manage the allocation of an amount equivalent to the net proceeds of its Green Finance Instruments on an aggregated basis for multiple Green Finance Instruments (portfolio approach).

Akropolis Group expects to allocate proceeds to Eligible Green Projects, selected in accordance with the Eligibility Criteria and the Process for Project Evaluation and Selection presented above, within 24 months of issuance of the Green Finance Instrument. Akropolis Group will ensure over time that the amount of Eligible Green Projects is at least equal to the proceeds of outstanding Green Finance Instruments.

Pending full allocation, unallocated proceeds from Green Finance Instruments will be managed in accordance with Akropolis Group's treasury management policy and may be used for other cash management purposes such as investments in cash or cash equivalents and / or debt repurchase or refinancing, with the exclusion of debt refinancing linked to carbon intensive assets / activities. If an Eligible Green Project no longer meets the Eligibility Criteria, the proceeds will be reallocated to other Eligible Green Projects as soon as reasonably practicable (but within a period of 24 months).

4.4. Reporting

Starting one year after the issuance of Green Finance Instrument(s), Akropolis Group will publish a report on the allocation of proceeds from Green Financing Instruments to Eligible Green Projects and on their impact annually until full allocation and in the event of material changes.

Akropolis Group will report on allocation and impact of Eligible Green Projects at least at the category level. Both the allocation report(s) and the impact report(s) will be made available on Akropolis Group's website at [AKROPOLIS GROUP, Ltd - Real Estate development company](#).

Furthermore, Akropolis Group intends to align its impact reporting with the approach described in the [ICMA Handbook – Harmonised Framework for Impact Reporting \(June 2024\)](#).

Allocation Reporting

The allocation report will include the following information, on an aggregated basis:

- The size of the identified portfolio of Eligible Green Projects
- The balance (if any) of unallocated proceeds
- The amount or the percentage of new financing⁴ and refinancing
- The geographic location of the projects, where feasible
- Upon Akropolis Group discretion, the amount or the percentage of projects aligned with the EU Taxonomy Climate Delegated Act's Substantial Contribution criteria, Do No Significant Harm (DNSH) and/or Minimum Safeguards (MS)

Impact Reporting

The impact report will include the following information, on an aggregated basis:

- A description of relevant Eligible Green Projects
- The breakdown of Eligible Green Projects by nature of what is being financed
- Environmental impact metrics regarding Eligible Green Projects on a best effort basis, including but not limited to:
 - Green building certification and level obtained
 - Annual emissions reduced in tonnes of CO₂ equiv. vs baseline year
 - % of emissions per sq.m* reduced vs baseline year (for operating assets)

**per average portfolio gross leasable area square meter of operating assets (compared to 2023 baseline year)*

Depending on availability and subject to confidentiality agreements, Akropolis Group might seek to complement the above indicators with relevant case studies. Akropolis Group may choose to appoint specialised consultants to develop a methodology for the estimation and calculation of the impacts that were made publicly available.

⁴ New financing refers to projects financed over the previous reporting period

4.5. External Review

Second Party Opinion

Akropolis Group has obtained an independent second party opinion from Sustainalytics to assess the alignment of the Framework with the ICMA Green Bond Principles 2021 (including the updated Appendix I of June 2022) and the APLMA/LMA/LSTA Green Loan Principles 2023. The independent second party opinion is available on Akropolis Group's website at [AKROPOLIS GROUP, Ltd - Real Estate development company](#).

Verification

Akropolis Group intends to request on an annual basis, starting one year after issuance and until full allocation, a limited assurance report on the allocation of the proceeds to Eligible Green Projects, provided by its external auditor (or any subsequent external auditor).

5. Disclaimer

The goal of this Green Finance Framework is to provide general overview and information contained herein shall be considered as non-exhaustive and of general nature. Akropolis Group does not guarantee the completeness or accuracy of the Green Finance Framework content.

This Green Finance Framework may contain statements about plans, objectives, strategies, future events or performances and expectations that should be interpreted as forward-looking statements and are based on various assumptions and inherently involve significant uncertainties and contingencies that are difficult to predict and are beyond Akropolis Group's control. The nature of such forward-looking statements makes them subject to risks and uncertainties that could cause actual results to differ significantly from the scenarios projected in these statements. None of the forward-looking statements, expectations, estimates or prospects contained in this Green Finance Framework should be understood as predictions or promises, nor should they be understood as an indication, representation or guarantee that the assumptions underlying such forward-looking statements are accurate or complete or are fully stated.

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This Green Finance Framework does not create any legally enforceable obligations towards Akropolis Group or its officers, employees or advisors. Failure to comply with any of the statements of this Green Finance Framework, including, but not limited to, failure to achieve any sustainability goals or targets set forth herein, shall not constitute a default or a breach of any obligations. This Green Finance Framework is not intended to provide legal or financial advice and should not be understood or used as such.

This Green Finance Framework should not be interpreted as an offer or invitation to, or solicitation of, any such distribution, placement, sale, purchase or other transfer of any Akropolis Group's securities. Prospective investors should base their investment decisions solely on the information contained in the prospectus or legal documentation associated with the securities offering. Prospective investors are encouraged to conduct their own independent assessments of Akropolis Group's business, financial condition, and the nature of the securities before making any investment decisions. It is possible that any prospectus issued in connection with the securities offering may contain different or updated information compared to what is presented in this Green Finance Framework.

This Green Finance Framework is not considered a prospectus or offering document and should not be deemed incorporated by reference into any prospectus or offering document. Furthermore, it is not intended for distribution or use in any jurisdiction where such distribution or use would contravene applicable laws or regulations. Individuals who come into possession of this document should familiarize themselves and comply with any relevant distribution restrictions.

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