# COMETE

by Alderan

## Transparency Code

The Transparency Code was updated on 30 June 2026, based on figures as at 31 December 2025

Head office: 4, avenue Georges Mandel - Paris (75116)
Companies Registry under no. 980 596 811
SCPI Visa no. 23-13 dated 1 Decembre 2023

ALDERAN

The SRI Label, in its July 2020 version adapted for the property sector and supplemented by its November 2021 implementation guide, recognises property funds that are committed to adhering to the principles of socially responsible investment by using a methodology based on enhanced Environmental, Social and Governance criteria. It is awarded by independent bodies accredited by COFRAC (the French Accreditation Committee). The SRI Label enables clearly defined and enforceable objectives to be set. The SRI Label is therefore part of a voluntary initiative by Alderan to integrate extra-financial criteria into the operational implementation of the investment strategy of the SCPI Comète, hereinafter the “fund” or the “SCPI” with a view to pursuing the objective of improving the non-financial performance of the property assets in the portfolio.

## Objectives of the Transparency Code

This Transparency Code has been introduced as part of the certification process for the Comète SCPI. Its purpose is to improve the clarity and transparency of the SRI approach for investors and all other stakeholders.

This document was first introduced at the end of 2024, during the SCPI’s first certification cycle, in order to align it with the new strategic and methodological guidelines of the SRI Label.

A further update to this Transparency Code took place in 2026.

## Guiding Principle

SCPI Comète is committed to communicating clearly, accurately and in a manner accessible to all audiences. This information, which is regularly updated, is intended to enable all stakeholders – and in particular investors and savers – to fully understand how ESG issues are integrated into the SCPI’s investment and management strategy.

## Compliance with the Transparency Code

Socially Responsible Investment (SRI) is an essential part of the strategic positioning and management of the Comète SCPI. Accordingly, the responses to this Transparency Code are intended to provide investors and stakeholders with clear and accurate information on the full scope of SRI management carried out by Alderan on behalf of the Comète SCPI. This document is made available to all investors.

# Summary

# 1. Preamble

This Transparency Code is adapted from the AFG[1] Transparency Code and the FIR[2] so that it may be applied to alternative investment funds (AIFs) in the property sector.

The purpose of this Transparency Code is to:

- improve the clarity and transparency of the approach taken by SRI property funds vis-à-vis investors, savers and any other stakeholders;
- contribute to strengthening more proactive self-regulation that promotes the development and promotion of SRI property funds through the establishment of a common, unifying framework of best practices in transparency.

## 1.1. What is the SRI Label?

Launched in late 2015 by the public authorities, the SRI Label enables investors to easily identify savings and investment products that seek to balance financial and non-financial performance by incorporating ESG criteria into their investment and management processes.

## 1.2. A government label

The SRI Label is a public label, created and supported by the Ministry of the Economy and Finance. The public authorities own the label (trademark, rules of use, reference framework) and approve proposals for changes to the label put forward by the Label Committee, an independent collegial body.

## 1.3. External certification

The SRI Label is awarded for a three-year period, renewable following an audit carried out in accordance with the label's specifications by a specially accredited independent third-party body. Labelled funds are monitored on an annual basis and, in the event of persistent breaches, may lose their label.

## 1.4. A benchmark in Europe

The SRI Label ranks first in Europe in terms of the number of labelled funds and second in terms of assets under management amongst the ten or so labels created over the last fifteen years, enabling investors to identify sustainable and responsible financial products more easily.

## 1.5. Added value of the SRI Label:

- a mark of credibility and visibility for SRI-certified funds;
- a guarantee of transparency and quality in SRI management for investors.

# 2. Fund covered by this Transparency Code

This Transparency Code applies to the SCPI Comète (ISIN: FR001400MQK9 - LEI: 969500RUMTT4YW0A3303).

| Primary strategy | Main asset classes | Geographical areas | Labels/Certifications |
|---|---|---|---|
| Best in progress | All types of assets | Spain, Italy, the Netherlands, the United Kingdom, Ireland, Poland, Canada | 1st cycle of the SRI Label obtained at the end of December 2024 and audited on 8 October 2025 by AFNOR with no non-conformities. |

(1) The French Association for Financial Management (AFG) represents professionals in the field of third-party asset management. It brings together all stakeholders in the asset management sector, whether providing individualised (discretionary) or collective management services.

(2) The FIR – Forum for Responsible Investment – is a multi-stakeholder association whose sole purpose is to promote SRI, or Socially Responsible Investment. The FIR brings together all stakeholders in the SRI sector: investors, asset management firms, brokers, non-financial rating agencies, investment advisers, market organisations and trade unions, as well as academics and committed professionals

# 3. General information on the management company and asset management

## 3.1. Name of the management company responsible for the fund(s) to which this code applies

Alderan, acting on behalf of SCPI Comète, is a portfolio management company established in 2015 and authorised under the AIFM Directive by the AMF under number GP-17000026 dated 5 September 2017. Alderan is a simplified joint-stock company registered with the Paris Trade and Companies Register (RCS) under number 538 704 979 and with its registered office at 4, avenue Georges Mandel, Paris16th arrondissement.

Its website, www.alderan.fr, provides information about the company, its products (in particular the SCPI Comète) and its team.

## 3.2 What is the background and what are the principles underpinning the responsible investment approach of the management company and its asset management activities?

The management company Alderan manages two SCPIs with SRI certification.

- The SCPI ActivImmo has held SRI certification since 8 December 2021 and had its certification renewed on 6 December 2024. Furthermore, since the end of December 2024, the SCPI Comète has also held SRI certification.
- The SCPI Comète's SRI strategy and methodology aim to drive progress in the property assets managed by the fund, using a 'Best in Progress' approach. This Transparency Code sets out the SCPI's SRI approach for its first three-year certification cycle.

## 3.3 How has the fund formalised its responsible investment approach?

SCPI Comète has formalised its responsible investment approach through the documentation set out below:

- this Transparency Code;
- the stakeholder engagement policy;
- the non-financial report published annually alongside the annual report, which incorporates the financial data and information relating to the real estate 's portfolio. The SCPI Comète non-financial report is available on the website www.alderan.fr.

## 3.4 How does the management company address the issue of ESG risks and opportunities, including those related to climate change

Alderan places great importance on integrating issues relating to sustainable finance, which include the ESG risks defined below:

- **sustainability risks:** these are risks associated with an event or situation in the environmental, social or governance sphere which, if it were to occur, could have a significant negative impact – whether actual or potential – on the value of the investments of one or more funds, and on their net asset value. The ESG risk management policy applies to funds that take these criteria into account, namely, at present, the SCPI Comète, which has been awarded the SRI Label.
- **physical risks:** physical risks, defined as exposure to the physical consequences of environmental factors.
- **climate risks :** risks linked to climate (weather and marine hazards: storms, cyclones, floods, landslides, etc.).

These risks have been broken down into nine risk categories within Alderan's ESG risk mapping, in order to identify the risks to which Alderan is potentially exposed. The nine categories are as follows:

- environmental risks;
- social risks;
- governance risks;
- reputational risk;
- ESG - related financial risks;
- regulatory and compliance risks;
- operational risks;
- risks related to the energy transition;
- supply chain risks.

Furthermore, in accordance with Article 3 of European Regulation 2019/2088 (SFDR), Alderan incorporates a policy on the integration of sustainability risks into the investment strategy of its SRI-labelled funds. In particular, if an asset is likely to be allocated to the SCPI Comète, Alderan checks that no deal-breaking criteria have been identified in relation to the fund's ESG approach. If such criteria are identified, the asset will be subject to further audits.

For the SCPI Comète, an assessment of exposure to climate change risks may be carried out during the acquisition phase or the management phase.

This assessment is based on the Bat-Adapt' tool from the Observatoire de l'Immobilier Durable (OID), or an equivalent tool. This criterion is taken into account in the ESG analysis framework under the Governance dimension.

## 3.5 Which teams are involved in the management company's responsible investment activities?

Firstly, Alderan has established a dedicated ESG unit focused entirely on this area. Alderan also involves all teams responsible for the acquisition and management of properties.

**The Investment team** therefore ensures that properties under consideration for acquisition do not meet any deal-breaking criteria and excludes any property whose characteristics deviate too significantly from the ESG objectives set out in the SCPI's investment policy.

**The ESG unit** identifies any improvements that may need to be made to the property in order to enhance its ESG rating in line with the SCPI's SRI strategy.

**The Asset Management** team then defines and implements a 'best in progress' continuous improvement programme tailored to each property. The Asset Management team shares this information with the ESG team to update each property's ESG rating annually and to summarise the SCPI's overall rating.

All these activities are subject to ongoing first-level controls carried out by the ESG team, second-level controls under the responsibility of **the Head of Compliance and Internal Control (RCCI)**, and finally periodic third-level controls entrusted to an independent external firm.

Finally, **the Sales Department** incorporates ESG considerations into its communications and materials for distributors, so that they can take into account the sustainability preferences of Comète's investors. Staff in the Sales Department are trained in sustainable finance issues, notably through preparation for the AMF Durable certification.

## 3.6 What internal or external resources does the management company use to incorporate ESG analysis?

Alderan's teams ensure that they have and implement all the resources necessary to achieve the objectives set out as part of SCPI Comète's SRI approach.

To this end, they integrate the objectives related to the SRI approach into their asset management process. The ESG unit ensures that all staff involved in its implementation receive training and fully understand this approach.

The ESG division has trained the in-house Investment and Asset Management teams to carry out and monitor ESG assessments of property assets. These teams may also call upon external service providers to assist with this ESG analysis. Resources are utilised to carry out this analysis, such as:

- benchmarks and thematic studies (Observatoire de l'Immobilier Durable, Deepki ESG index, etc.);
- ADEME databases;
- the standards for various thematic certificates and labels (HQE, BREEAM, etc.);
- internal standards;
- other market-specific standards.

Work relating to the implementation and roll-out of the SRI approach is overseen by the SRI Committee. This SRI Committee meets at least once a year.

The following matters will be discussed:

- monitoring the assessment of the SCPI's ESG indicators and the associated action plans;
- the performance of the property assets against the selected performance indicators;
- an overall assessment of the various asset classes;
- monitoring of measures to improve the ESG ratings of the property assets;
- monitoring the roll-out of the documentation framework (ESG management system);
- proposing improvements to tools and methods.

The SRI Committee comprises the following roles:

- the Chief Executive Officer;
- the Head of Compliance, Internal Control and Risk Management;
- the Head of Asset Management;
- the ESG Lead.

Furthermore, Alderan may engage external service providers to implement its SRI approach: project management, consultancy firms, etc.

## 3.7 In which Responsible Investment initiatives is the management company involved?

Alderan is a member of the SRI committee of the ASPIM (French Association of Property Investment Companies) and of the AFG (French Asset Management Association).

### 3.8 What is the total assets under management of the management company's property funds managed in accordance with an SRI approach?

The total assets under management of the management company's property funds managed in accordance with an SRI approach comprise the assets of the SCPIs ActivImmo and Comète, valued at their gross value, and amount to approximately 1.635 billion euros as at 31 December 2025.

### 3.9 What percentage of the management company's property assets under management are managed in accordance with an SRI approach, relative to total property assets under management?

As at 31 December 2025, the total assets under management of the two SRI-certified SCPIs represented 85,3 per cent of total assets under management.

### 3.10 Which SRI funds, open to the public, are managed by the management company?

To date, the SCPIs ActivImmo and Comète have been awarded SRI certification.

## 4. General information about the fund

### 4.1 What is the objective of incorporating ESG criteria into the fund?

Through its ESG approach, Alderan aims to contribute to improving the non-financial performance of property assets, with a particular focus on the existing portfolio. This portfolio forms the core of the SCPIs' investments and has long been less affected by public policies, which have mainly focused on new-build developments.

This 'best in progress' approach, which is a long-term one, is also consistent with the holding horizon typical of an SCPI.

To achieve this, it works both internally and with all external stakeholders: tenants, users and service providers. The overall objective is broken down into three areas: Environment, Social and Governance – for which the relative weightings adopted by Comète are as follows:

- Environment: 40 per cent;
- Social: 30 per cent;
- Governance: 30%.

The weighting assigned to each criterion, as well as that of the E, S and G pillars, was determined by taking into account the issues addressed by each criterion (levers for action) and the framework of the SRI label's 2021 version.

More specifically, the SCPI pursues the following objectives:

**Environmental aspect:**

- to limit the assets' energy, carbon and water consumption;
- to improve on-site waste prevention and management;
- promote biodiversity at relevant sites.

**Social Aspect:**

- improve the comfort of people working on the premises, particularly in terms of thermal and visual comfort;
- enhance the well-being and quality of workspaces and relaxation areas;
- integrate biodiversity and enhance the appeal of the sites.

**Governance Component:**

- to promote the resilience of assets to climate-related risks;
- encourage service providers to adopt more sustainable practices;
- engage tenants in the sustainability initiative.

The consideration of ESG criteria is not the subject of any specific financial target.

## 4.2 Which ESG criteria does the fund take into account?

The following ESG criteria are taken into account by the SCPI Comète:

**1. On the environmental (E) front, 28 criteria, divided into 5 themes:**

| Themes | Criteria |
| --- | --- |
| **Energy** | • presence of sub-metering for energy by usage (heating, cooling, lighting, etc.);<br>• whether energy consumption is sub-metered by area (at the very least, private areas and communal areas, where applicable;<br>• actual energy consumption in kWhEF/m² per year by energy source (use the DPE/CPE if the data is not available);<br>• existence of a monitoring system, with regular analysis of this consumption (energy reporting;<br>• existence of an energy management system such as SME;<br>• implementation of passive solutions to reduce energy consumption (dual-flow ventilation, enhanced insulation, etc.);<br>• implementation of technical solutions to reduce HVAC energy consumption;<br>• implementation of high-performance technical solutions for lighting, namely: installation of LED bulbs, lighting zoning, presence detection and timer-controlled lighting;<br>• existence of a green energy contract;<br>• on-site renewable energy generation (kWhEF/year). |
| **Carbon** | • GHG emissions linked to energy consumption, as a relative value of the asset (kgCO₂eq/m²) or within the top 30% according to international benchmarks (Deepki Index, OID, etc.) and asset types;<br>• existence of a building label or certification addressing carbon issues (E+C-, HQE, BREEAM, etc.). |
| **Water management** | • presence of sub-metering by use, by zone and/or by water type (potable/non-potable);<br>• presence of a system for monitoring water consumption;<br>• presence of a smart leak detection system;<br>• water-saving fittings in place (aerators, 3/6L flushes, etc.);<br>• no use of drinking water for watering green space;<br>• presence of a water reuse/recovery system (rainwater or sprinkler water). |
| **Waste management** | • provision of a dedicated waste management area of sufficient size to allow for waste sorting, as well as the easy handling and removal of bins to the outside;<br>• provision of waste sorting facilities for at least five waste streams (e.g. paper/cardboard, glass, compostable waste, household waste);<br>• promotion and implementation of best practices for waste reduction at source (during operations);<br>• implementation of a waste reduction strategy;<br>• taking environmental criteria into account when selecting a waste management contractor (distance, facilities, certification schemes). |
| **Biodiversity** | • analysis/assessment of biodiversity at the asset's site;<br>• existence of a certification scheme that takes biodiversity into account (Biodivercity, Effinature, Ecojardin, HQE, BREEAM, etc.);<br>• biotope coefficient >0,3. OR to be replaced by: eco-developable area (proportion of areas conducive to biodiversity);<br>• existence of measures and schemes promoting biodiversity (eco-grazing with sheep, green roofs, 'zero herbicide' policy, differentiated management of green spaces, nesting boxes, beehives, etc.),<br>• measures to limit urban sprawl or land sealing (e.g. reversibility of the building, removal of impervious surfaces, etc. |

### 1. In the social category (S), 13 criteria, divided into 3 themes:

| Themes | Criteria |
|---|---|
| **Mobility et accessibility** | • proximity to public transport (<15 minutes' walk or the provision of a shuttle service linking the site to the nearest public transport station);<br>• provision of bicycle storage facilities;<br>• connecting the site to major transport routes;<br>• site accessible to people with reduced mobility;<br>• provision of renewable energy charging points for electric and hydrogen vehicles. |
| **Health & comfort of occupants & neighbours** | • existence of measures or a specific study on natural lighting to ensure visual comfort for staff in logistics premises;<br>• assessment of occupant comfort (dynamic thermal simulation, hygrothermal measurements, indoor air quality, acoustics, etc.);<br>• absence of on-site pollution (asbestos, lead, R22, etc.);<br>• incorporation of indoor greenery;<br>• features that help reduce noise pollution for local residents (due to the building's location, cladding, etc.);<br>• provision of changing rooms with showers and lockers in sufficient numbers relative to the number of employees. |
| **Services provided to occupants** | • on-site facilities that contribute to staff wellbeing (catering, heated relaxation area, outdoor wellbeing space such as a vegetable garden, recreational area, picnic tables, etc.);<br>• availability of nearby facilities that contribute to employees' wellbeing (green spaces, catering, nurseries, gyms, etc.). |

### 1. In the governance (G) category, there are 11 criteria, divided into 4 themes:

| Themes | Criteria |
|---|---|
| **Supply chain management** | • inclusion of a social integration clause in contracts with contractors and suppliers;<br>• inclusion of a proximity criterion in the selection of contractors and suppliers (<50 km) for multi-tenant leases;<br>• inclusion of a sustainability criterion in the selection of contractors and suppliers (internal CSR policy, external communication and ESG commitment);<br>• systematic use of a green building site charter during construction works. |
| **Relations with stakeholders** | • proportion of leases containing an environmental annex;<br>• the existence of a system for informing occupants about the ESG measures implemented on site and for raising awareness of best practices (energy efficiency, reducing water consumption, etc.);<br>• conducting an annual tenant satisfaction survey incorporating ESG criteria;<br>• tenant satisfaction rate. |
| **Integration into the local environment** | • the property is integrated into the surrounding landscape (architecture, fencing, etc.). |
| **Risk management and resilience** | • a resilience assessment of the asset has been carried out (study of exposure, vulnerability, etc.);<br>• a plan has been drawn up to adapt the asset to the current and future climate-related hazards to which it is exposed. |

### 4.3 What climate change-related principles and criteria does the fund take into account?

Climate change mitigation risk is addressed within the energy and carbon criteria of the Environment section of the ESG framework, via a series of indicators. The physical risks identified for Comète's assets are fully taken into account by the ESG analysis framework. In particular, the resilience section of the Governance component uses the Bat-Adapt tool to assess whether a site is exposed to climate-related hazards. Where applicable, a proposal will be made to implement an adaptation plan.

This tool measures the risks of exposure to climate change using a mapping system covering the years 2030, 2050, 2070 and 2090, focusing on the following themes:

- heatwaves;
- droughts and the shrinkage and swelling of clay soils;
- precipitation and flooding;
- coastal dynamics;
- storms and strong winds;
- forest fires;
- extreme cold;
- landslides.

If risks are identified, a vulnerability assessment may be carried out.

### 4.4 What is the methodology for the ESG analysis and assessment of property assets (structure, assessment scale, etc.)?

The methodology for the ESG analysis and assessment of SCPI Comète's property assets is based on an ESG analysis grid specifically designed for the fund, taking into account its asset type, which comprises logistics warehouses and business premises. This framework enables each asset to be assigned a non-financial score on a scale of 0 to 100 prior to acquisition, and allows the progress or improvement of this score to be monitored year on year.

The rating system is structured around three ESG components, with weightings set in advance: Environment 40 per cent, Social 30 per cent, Governance 30 per cent. The overall score is therefore the weighted aggregate of these three components.

The framework then focuses on 12 ESG themes against which each asset is assessed: energy and renewable energy, carbon, water management, waste management, biodiversity management, mobility/accessibility, occupant health and comfort, services provided to occupants, tenant engagement, supply chain management, integration into the local area, and risk management, nd resilience. These themes contribute to the ratings within the E, S and G categories, and are then consolidated into a final score ranging from 0 to 100.

With regard to the investment strategy, acquisitions are analysed by the Investment team prior to investment committee meetings. Based on the available information, the Investment team seeks to identify any deal-breaking criteria, and then establishes an initial rating for the asset (or portfolio, where applicable) during the due diligence phase.

This analysis is based primarily on:

- a technical audit carried out by a specialist external service provider with all the necessary technical expertise;
- energy performance assessments;
- the documents provided by the seller.

Implementation of the 'best in progress' approach:

To align the SCPI Comète portfolio with ESG objectives, each asset must achieve a minimum score of 60/100 or improve by +20 points over three years compared with its initial score.

Assets that do not meet this minimum score of 60/100 are placed in the 'best-in-progress' portfolio and are subject to an action plan.

Their selection is also, and above all, based on an assessment of their potential for improvement.

### 4.5 How often is the ESG assessment of property assets reviewed?

The ESG assessment of property assets is reviewed annually by the Asset Management team and the ESG team.

In addition, an SRI Committee meets annually, bringing together the key functions involved in ESG issues, notably the ESG division, Senior Management, the RCCI and Asset Management. This committee provides an opportunity to review the actions undertaken over the year, analyse developments and share the main results achieved.

## 5. Management process

### 5.1 How are the results of ESG research taken into account in portfolio construction?

The results of ESG research are directly integrated into portfolio construction via two approaches: 'best in progress' and 'best in class'.

The selection and management strategy is based on defining and applying a minimum rating for the fund. The ESG rating serves as a benchmark for classifying assets and guiding investment and management decisions.

### 5.2 How are climate change criteria taken into account in portfolio construction?

Climate change is taken into account through the criteria set out in the ESG framework, and more specifically through the following themes:

- energy;
- carbon and GHG emissions;
- water management;
- waste management;
- biodiversity.

### 5.3 How are assets in the fund's portfolio that are not subject to an ESG analysis taken into account? Please specify the maximum proportion of such assets the fund may hold.

N/A – All assets held by SCPI Comète are subject to an ESG analysis at the time of acquisition and ar d throughout the period covered by the SRI Label.

### 5.4 Has the ESG assessment process and/or management process changed in the last twelve months?

No, the ESG assessment process or management process has not changed in the last twelve months.

### 5.5 Does the fund contribute to the development of the social and solidarity economy (see Article L. 3332-17-1 of the Labour Code)?

The fund does not contribute to the development of the social and solidarity economy.

### 5.6 Does the fund invest in UCITS?

SCPI Comète does not invest in UCITS.

## 6. ESG controls

### 6.1 What internal and/or external control procedures have been put in place to ensure the portfolio complies with the ESG rules established for the management of the fund?

In order to place internal control at the heart of Alderan's activities, a three-tier internal control framework has been implemented:

**The first level** is carried out by operational staff and their line managers as part of their day-to-day activities. This forms the essential foundation of the system known as 'first-level ongoing control', which is an integral part of the operational processes described in Alderan's internal procedures. With regard to the portfolio's compliance with the ESG rules established for the management of the Comète SCPI, first-level control is the responsibility of the ESG division, in coordination with the Investment team and the Asset Management Department, which are respectively in charge of acquisitions and the management of property assets. These first-level controls are formalised in the minutes of the investment committees during the acquisition phase and through the annual update of the ESG matrix during the management phase. Furthermore, the SRI Committee verifies the proper implementation of the approach as well as the calculation of the indicators used to report on the fund's non-financial performance.

**The second level** comprises two functions (compliance and risk management). An annual audit is carried out by the Internal Auditor to ensure, in particular, that ESG criteria are taken into account in the implementation of the SCPI's investment strategy, that the requirements of the SRI Label are met and, more generally, that the documents and information provided to investors and referred to in question 7.3 below are compliant.

**The third level** (or 'periodic audit') is entrusted to an external audit provider. The latter may also, in accordance with its three-year audit plan, verify the portfolio's compliance with the ESG rules established for the management of the Comète SCPI.

Finally, as part of the real estate SRI Label, a surveillance audit is carried out annually by an independent certification body, and a renewal audit is conducted every three years by the same body.

# 7. Impact measures and ESG reporting

## 7.1 How is the fund's ESG quality assessed ?

ESG quality is assessed by measuring the fund's non-financial performance. This performance is measured using performance indicators selected in line with the SCPI's SRI strategy.

## 7.2 Which ESG impact indicators does the fund use?

The following indicators have been selected by the Asset Management Department:

**Environmental aspect:**

- limiting the final energy consumption of assets: final energy consumption of assets in kWhEF/m²/year;
- reducing the carbon emissions of the assets: GHG emissions of the assets in $kgCO_2eq/m^2$/year;
- reducing water consumption by assets: proportion of assets fitted with water-saving equipment;
- improving waste prevention and management: average number of waste prevention and management initiatives per site;
- promoting biodiversity: number of sites implementing measures to promote biodiversity.

**Social aspect:**

- improving occupants' thermal comfort: proportion of properties where measures to improve thermal comfort have been implemented;
- improving the amenities and quality of occupants' leisure areas: proportion of properties where measures have been taken to improve the amenities and quality of leisure areas.

**Governance:**

- promoting the resilience of properties to climate risks: proportion of properties that have undergone a climate risk vulnerability assessment;
- encouraging service providers to adopt more sustainable practices: proportion of properties where the lease includes an ESG annex;
- encouraging tenants to adopt more sustainable practices: proportion of assets where contracts with service providers include ESG clauses.

## 7.3 What media channels are used to inform investors about the SRI management of the fund(s)?

Investors are informed via the following media:

- the SFDR pre-contractual information attached to the Comète SCPI prospectus;
- the SFDR periodic disclosures appended to the annual report;
- the annual non-financial report;
- the stakeholder engagement policy and this Transparency Code;
- information on sustainability risks, available under the 'sustainable finance' tab, in the 'sustainability risk management policy' section.

## 7.4 Does the management company publish the results of its engagement policy with regard to the fund's key stakeholders?

The results of the stakeholder engagement policy are reported annually in SCPI Comète's annual non-financial report.

Comète, a French société civile de placement immobilier, having its registered office 4 avenue Georges Mandel, 75116, Paris (France), registered with the Paris Trade and Companies Registry under no. 980 596 811, represented by its sole manager Alderan, a French portfolio management company, itself represented by Mr Benjamin Le Baut, acting in his capacity as CEO.

Alderan, a portfolio management company established under the laws of France, with a € 1,619,207 share capital, having its registered office in Paris (75116), 4 avenue Georges Mandel, registered with the Paris Trade and Companies Registry under no. 538 704 479, itself represented by Mr Benjamin Le Baut, acting in his capacity as CEO