

BIODIVERSITY POLICY

This document is part of the scope of the sustainability policies of MERLIN Properties SOCIMI, S.A. and its Group of Companies (hereinafter, "MERLIN" or the "Company").

The Board of Directors of MERLIN, in accordance with the provisions of Article 4 of the regulations of the Board of Directors, in its version of April 2015, has the responsibility of approving, among other things, this "Biodiversity Policy".

This policy is based on MERLIN's firm commitment to the environment, and to the preservation of the biodiversity of the territories in which the Company operates.

1. Purpose

The purpose of the Biodiversity Policy is to establish a reference framework to integrate the protection and promotion of biodiversity into the Group's strategy, and to define the principles of conduct for the development of a sustainable and positive business model with nature, so that its activities protect and promote the development and growth of the natural heritage, including, in particular, the protection of animals, as living beings endowed with sensitivity.

The degradation of ecosystems and the unprecedented decline in biological diversity, unanimously recognized by the scientific community as a direct consequence of the impact of human activities, entail serious environmental, economic and social risks, which calls for action to reverse the loss of biodiversity.

The Company is committed to assuming a leadership position in the conservation and promotion of biodiversity in its sector of activity and integrating into its management the United Nations 2050 vision "Living in harmony with nature", where biodiversity is valued, conserved, restored and used in a sustainable manner, maintaining ecosystem services, favoring a healthy planet and providing essential benefits for all people.

This is aligned with the achievement of Sustainable Development Goals (SDGs) seven, eleven, thirteen, fifteen and seventeen approved by the United Nations, to which the Company has adhered.

2. Scope of application

The Biodiversity Policy is applicable to the Board of Directors, the Management team and all employees of the Company, without exception, regardless of their position, responsibility or geographical location.

3. General principles of action

To achieve the implementation of its commitment to biodiversity, the Company shall be guided by the following basic principles of action that apply to all its activities:

- a. Integrate biodiversity into the Company's internal strategic planning and decision-making processes, as well as in the analysis, management and reporting of long-term risks;
- b. Identify, quantify and assess, on an ongoing basis and throughout the life cycle of the assets, the impacts and dependencies of the Company's activities on natural capital, including the diversity and protection of wild animals, protected and vulnerable species, promoting their respect in all lines of conduct;
- c. Protect species and habitats, those that are threatened and those of high biodiversity value, by adopting preventive, minimizing and enhancing measures;

- d. Manage and compensate both in quantity and in quality the negative impacts produced on the environment, giving priority to nature-based solutions, facilitating the connectivity of populations and encouraging the development of areas of special protection or private conservation; and
- e. Promote knowledge and training in biodiversity issues among the Company's professionals, as well as its suppliers.

4. Priority lines of action

Biodiversity plays a key role in MERLIN's strategy and, therefore, priority lines of action have been established in which the basic principles set out in the previous section will be applied:

- a. To have suitable habitats for the different species;
- b. Integrate sustainable urban drainage systems;
- c. Implement irrigation systems that allow greater water savings and are appropriate for each type of landscaping;
- d. Incorporate recycled and treated water facilities for irrigation, rainwater and/or gray water, whenever possible;
- e. Avoid the possibility of bird hits on building glazing by analyzing the most problematic areas for the placement of bird deterrents; and,
- f. Prioritize ecological gardening practices that favour biodiversity, promoting native species adapted to the climate of the area or region.

5. Communication of the Policy

The Policy will be made available to all the Company's stakeholders, both internally and externally, and will be the subject of appropriate communication, training and awareness-raising actions for its timely understanding and implementation throughout the organization.

6. Approval and updating

The Board of Directors of MERLIN Properties SOCIMI, S.A. is empowered to approve the Company's general policies and strategies.

The Biodiversity Policy shall be reviewed annually to ensure that it reflects the international recommendations and best practices in force at any given time and shall be amended when modifications occur.