

EU Taxonomy 2023

Introduction

Purpose

As a Norwegian public-interest company with more than 500 employees in the consolidated Group, it is mandatory for Hospitality Invest AS to report under the EU Taxonomy Regulation for 2023.

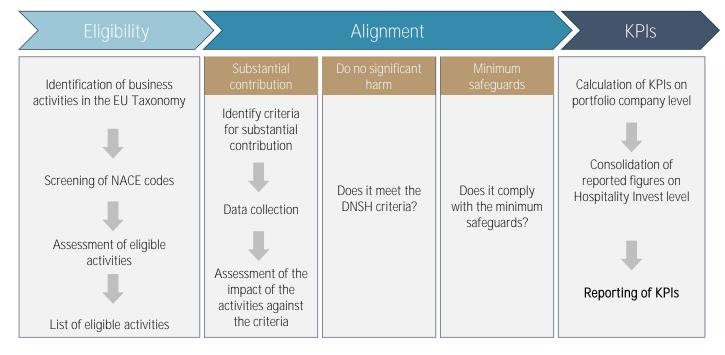
The EU Taxonomy Regulation classifies economic activities based on their environmental sustainability, to **encourage investments that align with the EU's climate** -and environmental objectives and the European Green Deal. The implementation of the taxonomy for Hospitality Invest AS will evolve over time as this is our first reporting year.

The EU Taxonomy Regulation serves as a guide for investors to channel funds into activities that advance the EU's environmental ambitions, which encompass:

- 1. Mitigating climate change
- 2. Adapting to climate change
- 3. Sustainably managing water and marine resources
- 4. Shifting to a circular economy
- 5. Preventing pollution and controlling it
- 6. Protecting and restoring biodiversity and ecosystems

To assess whether an activity significantly contributes to these objectives, the European Commission sets out technical screening criteria via delegated acts. Initially, in February 2022, criteria were available for only the first two climate-centric objectives. The subsequent four objectives were incorporated into the criteria in 2023. For Hospitality Invest, disclosures for the latter four goals added in 2023 remain not applicable for this year's reporting.

Hospitality Invest's adherence to the EU Taxonomy's goals is measured via three financial KPIs: Turnover, CapEx, and OpEx. An activity is tagged as "eligible" if it fits the EU Taxonomy's economic activity definitions and as "aligned" if it meets the substantial contribution criteria, the Do No Significant Harm ("DNSH") principles and satisfies the minimum safeguard requirements. The full report is presented in templates on pages 12–14, and the alignment process is outlined in the subsequent figure on the next page.



Refer to the figure above for a detailed overview of the process.

Hospitality Invests AS' initial taxonomy report for the 2023 fiscal year complies with the established EU Regulation (EU) 2020/852 and subsequent delegated legislation.

Scope

All of Hospitality Invest's consolidated portfolio companies have been considered for reporting on the EU Taxonomy for 2023.

We have not included joint ventures and associated companies, as they are not consolidated in the Group's financial statements. Each portfolio company has identified their potential eligible activities by assessing their economic activities that are potentially sustainable by using the EU Taxonomy Compass with assistance from Hospitality Invest's ESG-team.

As Ferda Norge AS will be consolidated in Hospitality Invest's figures in the Other segment starting Q1 24, Ferda has not been assessed, nor is included in Hospitality Invest's taxonomy reporting for 2023.

The financial information in the following section is based on IFRS and Hospitality Invest's consolidated annual accounts for 2023. See note 1 in Hospitality Invest AS' annual accounts for a specification of accounting principles, including consolidation principles.

Taxonomy eligible and aligned activities

Process

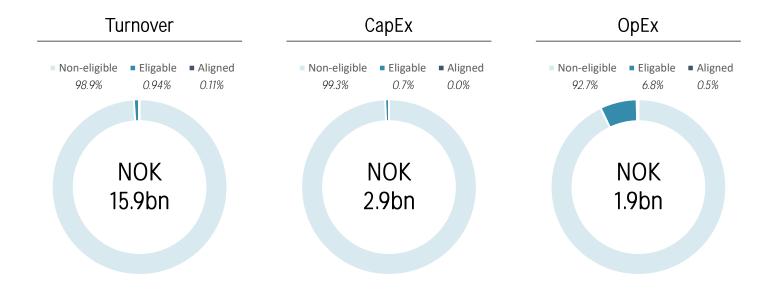
Hospitality Invest has conducted an EU Taxonomy assessment for activities eligible for 2023 reporting, based on current legislation, guidance, and information. Notably, changes in legal and regulatory environments could alter the assessment of our activities under taxonomy regulation in the future.

Hospitality Invest's controlling companies are diverse as the Company operate as a diversified family-owned private investment company. As mentioned, each relevant portfolio company, with support from Hospitality Invest AS' own ESG-team, has conducted the taxonomy assessment. This process began with eligibility checks and was followed by compliance assessments against the technical screening criteria for substantial contribution, the DNSH principle and minimum safeguard requirements.

Hospitality Invest has performed a group-level assessment of minimum safeguards based on the Group's policies and procedures. Activities meeting the screening criteria, DNSH, and minimum safeguards are reported as aligned. Hospitality Invest aggregates this data for its portfolio company reporting. In evaluating the technical screening criteria, we have faced interpretation challenges and uncertainties in best practice application. Certain criteria reference to EU directives that are either not adopted or only partially enacted in Norway, resulting in gaps and ambiguities in specific requirements and thresholds. Consequently, this may lead to certain requirements and thresholds not being provided.

In the subsequent section, we present the proportion of Hospitality Invest's consolidated turnover, capital expenditure (CapEx), and operational expenses (OpEx) linked to taxonomy-eligible and aligned activities for the 2023 financial year.

The following figure outlines Hospitality Invest's economic activities within the taxonomy. Currently, a minimal proportion of our activities align with the taxonomy, primarily due to the Company's core business activities (amongst Residential Care and Education) are not encompassed by activities under climate change mitigation or adaption. Nonetheless, Hospitality Invest actively fosters sustainability and social responsibility across its business spectrum. Details on our comprehensive sustainability initiatives are available in our Sustainability Report found on our website: https://hospitalityinvest.no/sustainability/



Hospitality Invest has identified the following economic activities covered by the taxonomy, across the current two environmental objectives. Two of these are assessed both as eligible and as taxonomy-aligned, the rest being either eligible or non-eligible.

Activity	Economic activity	Company	Eligible	Aligned
4.5	Electricity generation from hydropower	Haneseth Gruppen	√	×
4.9	Transmission and distribution of electricity	Haneseth Gruppen	√	×
4.16	Installation and operation of electric heat pumps	Haneseth Gruppen	√	x
7.1	Construction of new buildings	Norlandia Health & Care Group, BG Entreprenør	√	x
7.2	Renovation of existing buildings	Norlandia Health & Care Group, BG Entreprenør	√	x
7.3	Installation, maintenance and repair of energy efficiency equipment	Haneseth Gruppen, Norlandia Hotel Group	√	x
7.4	Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	Haneseth Gruppen Norlandia Hotel Group	√	√
7.6	Installation, maintenance and repair of renewable energy technologies	Haneseth Gruppen	√	√
7.7	Acquisition and ownership of buildings	Norlandia Health & Care Group	√	×

Hospitality Invest has not been able to conduct a climate risk and vulnerability assessment across the Group's activities. As this report represents Hospitality Invest's first report on the taxonomy, we have not been able to complete this process. As a result, in our 2023 report, certain activities that may have qualified for alignment are currently categorized only as eligible.

4.5 Electricity generation from hydropower

Haneseth Gruppen ("Haneseth") owns its own power plant that can produce 100% renewable energy from hydropower that is mainly used for its own operations. In addition, Haneseth offers a range of services in the hydropower sector, including streamflow calculation, preliminary project assessments, control systems, site and flow rate calculation and permit applications.

<u>Alignment review:</u> Haneseth's own power plant operate as river power plants, thus aligning with the significant contribution compliance criteria. However, the facility does not meet the EU Taxonomy's DNSH criteria. Consequently, this activity has been assessed as not taxonomy-aligned.

4.9 Transmission and distribution of electricity

Haneseth provide a comprehensive set of services in the high-voltage electricity sector. Their offerings encompass a full range of solutions for distribution systems, including roles like operations management and engineering services.

<u>Alignment review:</u> Haneseth meets one of the EU Taxonomy criteria for alignment by constructing and operating electric vehicle (EV) charging stations and supporting electric infrastructure. This activity promotes the electrification of transport and adheres to the technical screening criteria under the transport section of the taxonomy Annex of this section. In addition, Haneseth provides construction/installation and operation of equipment and infrastructure where the main objective is an increase of the generation or use of renewable electricity generation.

For the activity to be aligned with the EU Taxonomy, Haneseth must also meet the DNSH criteria. Haneseth currently does not meet this criteria due to the lack of a waste management plan and systems to monitor pollution prevention. The company intends to address these gaps by initiating efforts to establish a waste management plan and implement systems that comply with pollution prevention criteria to ensure future alignment.

4.16 Installation and operation of electric heat pumps

Haneseth offers installation and operational services for electric heat pumps, an activity that qualifies as eligible under the current criteria.

Alignment review: Haneseth is yet to implement systems to evaluate whether the installation and operation of electric heat pumps meet the substantial contribution criteria, specifically regarding the refrigerant threshold and energy efficiency requirements for the electric heat pumps. In addition, Haneseth does not currently meet the DNSH criteria pertaining to the circular economy and pollution prevention for the installation and operation of electric heat pumps. The company intends to develop and implement measures to address these criteria's, including assessing the use of durable and recyclable components and establishing a waste management plan, as well as adhering to sound power level thresholds for air-to-air heat pumps.

7.1 Construction of new buildings

In 2023, two of Hospitality Invest's subsidiaries; Norlandia Health & Care Group and BG-Entreprenør, executed several new building projects.

<u>Alignment review:</u> While each new construction has been designed with an emphasis on energy-efficient designs, it is not yet determined if they meet the rigorous standards required for zero-emission buildings. Due to time constraints and the complexity of these standards, further assessments have been deferred. As a result, this activity has not been included in the taxonomy-aligned activities report for this year. It should be noted that in terms of energy, the buildings are constructed in accordance with the Technical Regulations (TEK 17), which sets requirements for energy savings. For NHC's kindergartens for instance, a standard of 135 kWh per square meter has been established as a standard.

7.2 Renovation of existing buildings

Hospitality Invest's portfolio companies has facilitated renovations of buildings and other facilities, including the replacement of floors, doors, roofs, windows and other upgrades.

<u>Alignment review:</u> None of the renovations complied with the criteria for substantial contribution for this activity. Consequently, further assessments to determine if the activities meet the DNSH criteria have not been conducted. Therefore, these activities are not included in the reporting of taxonomy-aligned activities.

7.3 Installation, maintenance and repair of energy efficiency equipment

Hospitality Invest's companies are dedicated to ongoing energy efficiency and related improvement initiatives in their offices, facilities, etc. For the purposes of this taxonomy report, we have chosen to assess only those measures related to energy efficiency in buildings as it falls within the scope of this taxonomy activity.

<u>Alignment review:</u> The substantial contribution criteria encompass the installation, replacement, maintenance, and repair of heating, ventilation, and air-conditioning (HVAC) systems, services that are among Haneseth's offerings. However, the lack of verification regarding whether these products meet the EU energy efficiency standards, as stipulated by the EU Directive 2010/31/EU (Energy Performance of Buildings Directive) and bear the high energy-efficiency label under EU Regulation (EU) 2017/1369, results in the determination that these activities do not align with the current standards.

7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)

Haneseth install charging stations for electric car charging at home, at work, in housing associations or in commercial buildings, and adapt existing electrical systems to support charging. They also advise on best practice for safe and efficient charging and provide maintenance to ensure reliable operation. In addition, Norlandia Hotel Group has taken a step towards climate action measures by installing several electric vehicle charging stations at several hotels.

<u>Alignment review:</u> Currently, there is only one DNSH criterion related to the environmental goal of adaptation to climate change for this activity. Hospitality Invest assesses that all our activities satisfy this generic criterion, thereby including this activity in the reporting of taxonomy-aligned activities.

7.6 Installation, maintenance and repair of renewable energy technologies

Haneseth offers a range of services in the renewable energy sector, including the installation, maintenance, and repair of various systems and technologies. In response to the surge in electricity costs in 2023, the interest in microturbines increased significantly. To meet this demand, Haneseth initiated production of a series of small-scale hydro turbines, with capacities from 20 to 250 kW. These turbines are produced at their own facility in Mo i Rana, Norway. Additionally, the company provides and installs a variety of heat pumps. For example, for Ferda, Haneseth implemented a new aerothermal heating system in the vehicle hall, operated by two heat pumps.

<u>Alignment review:</u> The projects associated with this activity, including the installation of turbines and ancillary technical equipment, and heat exchange systems, are thus considered a contributor to the first environmental objective. Currently, for this activity, there is only one DNSH criterion related to the environmental goal of climate change adaptation. Hospitality Invest assesses that all of our activities meet this generic criterion. Therefore, this activity is included in the reporting of taxonomy-aligned activities.

7.7 Acquisition and ownership of buildings

The real estate segment under Norlandia Health & Care Group ("NHC") engages in purchasing real estate and maintaining ownership of such real estate, making their activities eligible.

<u>Alignment review:</u> NHC has conducted an analysis of their property holdings against established criteria for contributing significantly to climate change mitigation. The criteria for assessing a building's Primary Energy Demand (PED) vary depending on the construction date. There is a distinction between buildings constructed before and after December 31, 2020. It has been determined that buildings from both periods fail to meet the substantial contribution criteria. As a result, this activity has been evaluated as not being in alignment with the taxonomy standards.

Relevant activities

11. Education and 12.1 Residential care activities

Hospitality Invest's majority-owned companies, although diverse, share a common focus on labor-intensive sectors, particularly in elderly and social care services, as well as competence and staffing solutions for social welfare services. Specifically, activities falling under Taxonomy categories 11 (Education) and 12.1 (Residential care) are relevant, where the focus is on the environmental objectives related to the properties used for these activities.

However, neither NHC nor Ifront Karriere, the relevant companies in these sectors, own the properties where their operations take place. Consequently, the ability to undertake long-term environmental scenario analyses is limited. Although long-term rental contracts increase exposure risks over time if the buildings are not adapted, collaboration with property owners and municipal clients is essential to identify solutions that meets EUs criteria for climate change mitigation.

In terms of climate change adaptation, both Education and Residential care activities are categorized as transitional activities under Taxonomy regulations. For such activities, only CapEx and OpEx related to measures enhancing resilience against physical and non-physical climate risks are relevant. Given that neither company owns the properties where these activities occur, property owners typically handle environmental scenario analyses and adaptation measures. Therefore, NHC and Ifront Karriere are not obliged to report CapEx or OpEx for these transitional activities.

While NHC and Ifront Karriere's core activities do not directly fall under the first two environmental objective of the EU Taxonomy, they actively promote sustainability and social responsibility in other operational contexts. For more details, please refer to Hospitality Invest's ESG Report and NHC's own sustainability report.

Minimum social safeguards

The minimum safeguards assessment has been conducted by Hospitality Invest AS on group level, based on existing policies and procedures covering the Group. Hospitality Invest expects its business partners to respect human rights and abide by minimum safeguards on social aspects in alignment with OECD Guidelines for Multinational Enterprises and The UN Guiding Principles on Business and Human Rights. Furthermore, Hospitality Invest expects business partners to perform human rights impact assessments and due diligence to understand and mitigate potential and actual adverse impacts and ensure that their companies, through their operations, do not cause or contribute to adverse human rights impacts.

Please refer to the following sections for information on Hospitality Invest's processes and outcomes related to minimum safeguards:

- Human rights, including workers rights: Refer to the our the 2022 ESG report page 24
- Anti-corruption: Refer to the ESG principles in Hospitality Invest in the 2022 ESG report
- Other: Refer to Hospitality Invest's Supplier Code of Conduct which can be found at our website: https://hospitalityinvest.no/sustainability/

Reporting requirements

Taxonomy KPIs

Turnover

The KPI for revenue is calculated as the portion of net revenue derived from taxonomy-compliant and non-compliant activities, divided by total net revenue.

The recognized amount corresponds to the Group's total net sales and is assessed using the same principles as in our 2023 Annual Report. The amount corresponds to the total operating revenue and other income in the consolidated income statement on page 32 and note 4 in the 2023 annual report. For further details on our accounting principles for consolidated net revenue, please see page 18 of the 2023 annual report.

Capital expenditure (CapEx)

The CapEx-based KPI is calculated as the portion of capital expenditures related to assets or developments associated with taxonomy-compliant/incompliant activities, divided by total capital expenditures.

The denominator in the CapEx KPI calculation is defined as all capitalized costs in the consolidated financial statements during the year and includes capitalized costs from the following IFRS standards, which are the relevant standards for the Hospitality Invest:

- IAS 16 Property, plant and equipment
- IAS 38 Intangible assets
- IFRS 16 Leases

The CapEx denominator also includes additions to fixed and intangible assets resulting from business combinations (acquisitions of business).

The numerator in the CapEx KPI includes the total capitalized costs related to taxonomy-eligible and taxonomy-aligned assets during the year

Operating expenditure (OpEx)

Total OpEx in the OpEx KPI does not necessarily equal total OpEx from the consolidated financial statement.

The OpEx KPI differs from total OpEx reported in the consolidated financial statements, focusing on direct, non-capitalized costs pertinent to daily operations and asset maintenance. This includes research and development, building renovations, short-term leases, and routine maintenance.

For the KPI, the numerator captures the portion of OpEx for assets and processes tied to taxonomy-aligned activities, such as staff training, adaptation needs, and direct research and development costs not capitalized. Additionally, it includes expenditures contributing significantly to climate change adaptation as outlined in Annex II of the Climate Delegated Act. Only the segments of OpEx making a substantial contribution to climate adaptation are factored into the numerator.

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Text		Millions, local CCY	%	%	%	%	%	%	%	N/A	N/N	N/A	Y/N	N/A	N/A	N/A	%	E	T
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Acquisition and ownership of buildings		6,157.00	0%																
Construction of new buildings		6,521,900.00	0%																
Electricity generation from hydropower		193,141.00	0%																
Installation and operation of electric heat pun	eat pun	482,358.00 665.150.00	0%																
Renovation of existing buildings		3,229,959.00	0%																
Transmission and distribution of electricity	icity	2,124,547.00	0%																
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		13,223,212.00	1%																
Total (A.1+A.2)		14,710,132.00	1%																
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES	-																		
Tumover of Taxonomy-non-eligible activities		1,387,935,955.00	99%																
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* For the purposes of this illustrative template, this figure shows the: Taxonomy-aligned turnover of the activity / Total Taxonomy eligible turnover of the activity.

** Taxonomy-aligned turnover of the activity / Total turnover of undertaking

Note: Figures in EUR

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* For the purposes of this illustrative template, this figure shows the: Taxonomy-aligned turnover of the activity / Total Taxonomy eligible turnover of the activity.

**Taxonomy-aligned CapEx of the activity/ Total CapEx of undertaking

Note: Figures in EUR

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A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) Acquisition and owners hip of buildings (OpEx 0.00 0%	ngs (OpEx	able activities (not Taxo	onomy-aligne	ed activities)															
Construction of new buildings (OpEx B)	в)	6,334,037.00																	
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Installation, maintenance and repair of energ	ir of energy	403,657.00																	
Renovation of existing buildings (OpEx B)	Ex B)	1,943,272.00	1%																
Transmission and distribution of electricity (Q	ectricity (Or	1,874,853.00	1%																
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)	not	11,053,882.00	7%																
Total (A.1+A.2)		11,909,736.00	7%																
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES	S																		
OpEx of Taxonomy-non-eligible activities	35	150,809,701.00	93%																
Total (A+B)		162,719,437.00	100%																

* For the purposes of this illustrative template, this figure shows the: Taxonomy-aligned turnover of the activity / Total Taxonomy eligible turnover of the activity.

** Taxonomy-aligned OpEx of the activity / Total OpEx of undertaking

Note: Figures in EUR



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