



EPP Community Properties JV B.V. (EPP CP) ethical marketing & communications policy

September 2024

Why do we need this policy?

Transparent communications, both internal and external, is a key element of any sustainable development strategy.

This policy is an expression of our dedication to properly communicate EPP CP 's activities through marketing and public relations, social media, websites and other communication channels, and to prevent accusations of, for example, greenwashing. We want to effectively and transparently engage and communicate with our stakeholders in the spirit and in line with ESG requirements.



What does the policy include?

Colourwashing & greenwashing

One of the most common concerns that companies face when communicating their ESG policies is greenwashing. In this section, we provide a definition of colourwashing and greenwashing and ways to prevent them

Ethical communications principles

This section provides basic principles to guide you towards running transparent and ethical communications

Dos & Don'ts

The last part gives specific examples of desirable actions and those that should be avoided while communicating on EPP CP





Colourwashing & greenwashing

All colours of manipulation

Colourwashing is an umbrella term for the profit-driven practice of companies and brands to deceptively communicate unsubstantiated values in products and services to appeal and market them better to socially and environmentally aware consumers. It is the practice of marketing values without the substantiated evidence needed to uphold those values.

The most known and common type of colourwashing is **greenwashing**, and it may occur when communicating **ESG-related topics**.

At EPP CP we are aware of colourwashing practices, we know the ways to prevent them, and we make every effort to avoid such practices.



Types of colourwashing

PINKWASHING

The promotion of the female empowerment through advertisements, product messaging or further brand communications while hiding ones own exploitative and/or unequal practices towards women

RAINBOWWASHING

Trying to appear as being supportive of LGTBQIA+ movement while not empowering LGTBQIA+ individuals inside of your own business

BROWNWASHING

Trying to appear as being supportive of Black, Brown, Indigenous and People of Color while not implementing anti-racist and/or BIPOC empowering circumstances into the own business

WHITEWASHING

An attempt to prevent people from knowing the true facts about a situation, particularly in difficult and crisis contexts

What is greenwashing?

According to the American Sustainable Business Network (ASBN):

GREENWASHING IS DEFINED AS “THE ACT OR PRACTICE OF MAKING A PRODUCT, SERVICE, ORGANISATION, OR POLICY APPEAR MORE ENVIRONMENTALLY FRIENDLY OR LESS ENVIRONMENTALLY HARMFUL THAN IT ACTUALLY IS”.

It is used to describe a false, misleading or untrue action or set of claims made by an organisation about the positive impact that a company, product or service has on the environment.

The aim of such practices is to gain the trust of customers and stakeholders, and to build the perception of the company/brand as socially responsible.

Accusations of greenwashing can also arise in relation to activities that have a positive environmental impact and are sustainable but have not been properly communicated. Therefore, it is essential to follow good practices when communicating on sustainability.



Examples of greenwashing

hf. We're living in the **golden age of greenwash**. And companies are **finding ever newer ways to pull the wool over buyers' eyes, creating distinct types of greenwashing** to look out for, such as:

<p>GREENWASHING</p> <p>When companies make misleading claims about their environmental credentials to get people interested.</p> 	<p>GREEN CROWDING</p>  <p>Involves hiding in a group and moving at the speed of the slowest adopter of sustainability policies.</p>
<p>GREENSHIFTING</p> <p>Is when companies imply that consumers are at fault and shift the blame onto them.</p> 	<p>GREEN LIGHTING</p>  <p>In a greenwashing context, is when a company spotlights a particularly green feature of its operations or products. This tactic aims to draw attention away from environmentally damaging activities being conducted elsewhere.</p>
<p>GREEN RINSING</p> <p>Refers to a company regularly changing its ESG targets before they are achieved. Short for Environmental, Social and Governance, ESG is a set of standards measuring a business's impact on society, the environment, and its transparency and accountability.</p> 	<p>GREEN LABELLING</p>  <p>Is a practice where marketers call something green or sustainable, but closer examination reveals this to be misleading.</p>

And now there is also **GREENHUSHING**

It's when organizations choose to **under-report or hide their green or ESG credentials from public view for fear of being accused of greenwashing!**



Suggesting “greenness” without providing evidence or while based on non-transparent data

Using vocabulary indicating eco-friendliness (e.g. “eco-”, “bio-”, “environmentally friendly”) without justification (so-called green labelling)

Highlighting the company's activities that are environmentally relevant but insignificant in terms of the company's operations

Promoting the “lesser evil”, i.e. a solution that is “less harmful” than comparable one, but is still not environmentally friendly or harmless

Statement of untruth

Green lighting – is when a company spotlights a particularly green feature of its operations or products. This tactic aims to draw attention away from environmentally damaging activities being conducted elsewhere

Green crowding – involves hiding in a group and moving at the speed of the slowest adopter of sustainability policies

Green rinsing – regularly changing the company's green targets before they have been achieved

Greenshifting – when companies imply that consumers are at fault and shift the blame onto them

A woman with dark hair tied back, wearing a light blue polo shirt, is looking down at a black smartphone she is holding in her hands. The background is a blurred office or indoor setting with a window. A blue rectangular box with rounded corners is overlaid on the right side of the image, containing white text.

**Ethical
communications
principles used at EPP
CP**

Rules of ethical communications at EPP

Ethical communications is about passing information between two parties in a manner that is accurate, truthful and acceptable.

Therefore honesty, transparency and respect are applied when communicating on behalf of EPP CP, and communications is designed so that the recipient clearly understands the message.



How do we communicate at EPP CP

1. We are open, honest and transparent
2. We are respectful for our audiences and stakeholders
3. We provide facts and data-driven information
4. We aim to use clear language that is tailored to our audience – [diversity and inclusion in communications](#)
5. We avoid speculations, negative tone and judgemental language
6. We do not lie or try to make things look better even when dealing with difficult situations
7. We strive to answer all questions – even the difficult ones – from our stakeholders without undue delay. If we don't know the answer at a given time, we come back later with an answer
8. We are self-aware and apologetic when we make a mistake
9. We are aware of colourwashing practices including the most well-known and common type of them – greenwashing, we [know the ways to prevent them](#), and we make every effort to avoid such practices



Diversity and inclusion in communications



People are diverse, including the way they absorb information or communicate with others. Therefore, communications also need to be diverse.

Diversity in communications is about taking into account different audiences when developing verbal, written, visual or non-verbal messages. It adapts and adjusts communications styles, approaches and content to effectively engage and connect with people from diverse backgrounds.

Inclusive communications considers and respects the diversity of individuals by eliminating barriers that might arise from differences in culture, language, abilities, and perspectives. It:

- Avoids stereotypes
- Is mindful of cultural sensitivity
- Uses clear and plain language
- Is accessible (it accommodates visual and auditory impairments)
- Utilises both text and visual representations
- Is easily converted to different languages
- Uses respectful language

Greenwashing can be avoided by

- Taking a fact-based approach (through verification of facts, not using any false information)
- Using only claims and data that are based on verified sources (e.g. scientific research, third-party certifications or government data)
- Using the latest data and reports on the company, not relying on information that may be out of date
- Providing information in a manner that is not distorted or misleading, even if the content is true and accurate
- Avoiding general statements (“environmentally friendly”, “this solution is green”)
- Using precise, understandable, non-emotional language, without technical terms (e.g. avoiding jargon) that may be incomprehensible to the recipient
- Eliminating claims that a solution is better than others in a particular category or industry, without bearing in mind its overall environmental impact



Dos & Don'ts



The best practices used

DO:

Include relevant sources while communicating data and figures

Give the broader context so your message is clearly understood

Show the impact your actions/achievements/investments have on the stakeholders including the Planet

Update your claims in case of technical advances

Make appropriate comparisons

Support key messages by clearly verified facts and figures

DON'T:

Use general claims

Use unclear or ambiguous claims

Make references to overall environmental/social friendliness

Overestimate the small, insignificant positive aspects to make the overall business look more sustainable

Use irrelevant/selective comparison groups

Be subjective and excessively optimistic while making evaluation of your business impact

DOs in practice (1/3)



Include relevant sources while communicating data and figures

- Messages, in particular figures, should be referenced to the exact source of the data with an indication of the time
Example: *2025 EPP CP Goal: 13,500 Mg CO₂ reduction of indirect (Scope 2) GHG emissions comparing to the base year (2019).*
Source: EPP CP ESG REPORT 2023.

Give the broader context so your message is clearly understood

- Saying that your actions or plans have positive impact on the planet without indicating how it is going to be achieved is misleading. Give explanations and broader context
Example: *We plan to significantly reduce our GHG emissions in the coming years. This will be achieved by, among other things, reducing energy consumption and purchasing energy from alternative sources. By 2030, the share of green energy for Scope 1 and 2 used in the assets we manage is expected to be as high as 60%.*

DOs in practice (2/3)



Show the impact your actions/achievements/ investments have on the stakeholders including the Planet

- The achievements emphasised in the communications need to be translated into a significant impact that can be observed
Example: *Photocell-controlled taps and the installation of aerators in Galeria Młociny has led to a 50% reduction in water consumption.*

Update your claims in case of technical advances

- If developments achieved by technical advances or certain implementations lead to a change in claims/ facts/ plans, they must be reviewed and updated
Example: *In FY2022/2023 LED lighting was used in 82% of the shopping centre's common areas. This figure is expected to increase in the coming years, which will impact on the reported electricity savings. This figure should be reviewed and updated accordingly.*

DOs in practice (3/3)



Make appropriate comparisons

- When comparing, the selected criteria must be relevant. In comparing with another period, it is important to ensure that it covers the same length of time, but also that there have not been any significant changes in the market during the period in question
Example: *The shopping centre's turnover in 2020 was 50% lower than in 2019, due to the coronavirus pandemic and numerous restrictions.*

Support key messages by clearly verified facts and figures

- The data provided must be based on credible, independent, scientific and reliable evidence
Example: *In 2023, the EPP CP Group has committed to reducing absolute Scope 1 and 2 GHG emissions by 50% by 2030 and by 90% by 2050 compared to a 2019 baseline. These short- and long-term targets were reviewed and validated by the Science Based Targets initiative (SBTi).*

DON'Ts in practice (1/3)

No general claims

- Don't use general, not precise statements. Instead, describe specific features, materials, areas – real benefits or business impact
Example: Instead of saying e.g.: *EPP CP is sustainable*, say e.g.: *EPP CP is on track to become net zero by 2050, having achieved a 22% reduction in GHG emissions in the portfolio it directly manages in the FY2022/2023 compared to 2019.*

No unclear or ambiguous claims

- Environmental benefits must be verifiable and clear about which (product/ activity/ implementation/ service/ operations) characteristic the statement refers to
Example: Instead of saying e.g.: *The majority of energy used comes from renewable sources*, say e.g.: *EPP CP is already using electricity from renewable sources in the common areas in 100% in office and in 20% in retail assets.*



DON'Ts in practice (2/3)

No references to overall environmental/social friendliness

- The environmental aspects should be specific and consider the impact of the whole service/ building
Example: Instead of saying e.g.: *Choosing an EPP CP-managed office building means protecting the environment*, say e.g.: *EPP CP-managed office building is a right choice for environmentally aware companies as it uses 20% less electricity resulting from implemented upgrades, such as LED lighting, CO₂ sensors or BMS update.*

Avoid overestimating the small, insignificant positive aspects to make the overall business look better

- Avoid highlighting one positive aspect of minor importance without considering company's overall impact
Example: Instead of saying e.g.: *The waste bins in the shopping centre parking lot are made of recycled plastic*, say e.g.: *We are delivering improvements at many levels of the business. We focus on both the sustainable management of the building and the elements around it, such as recycling bins, though we are aware this is just one piece of a bigger puzzle.*



DON'Ts in practice (3/3)

Don't use irrelevant/selective comparison groups

- Comparisons need to be based on objective and relevant group criteria, not manipulated to make the company look better
Example: Instead of saying e.g.: *Our shopping centre is built in a more sustainable way than the metal factory next to us*, compare your business/service to your industry benchmarks.

Don't be subjective and excessively optimistic while making evaluation of your business impact

- It is not recommended to make subjective comparisons of the described services or your business, also regarding sustainable claims
Example: Instead of saying e.g.: *Our shopping centres are the most ecological on the market. We use certified materials, which is why our buildings are the most sustainable*, show the third-party assessment or accreditation as a proof-point.



