EU TAXONOMY · AUTOMATED ASSESSMENT

EU Taxonomy Reporting Assessment

Alderhof Vastgoedgroep

Acquisition and ownership of buildings

REFERENCE	CENS-2026-21387
DATE OF ASSESSMENT	19 August 2026
DATE OF ISSUE	20 August 2026
CRITERIA BASIS	Delegated Acts as amended, in force July 2026
UNIT OF ASSESSMENT	Alderhof Vastgoedgroep's portfolio of 60 residential buildings held for letting.
PREPARED BY	Censatim · censatim.com

EU TAXONOMY · AUTOMATED ASSESSMENT

EU Taxonomy Reporting Assessment

SUBJECT	REFERENCE	DATE OF ASSESSMENT	DATE OF ISSUE
Alderhof Vastgoedgroep	CENS-2026-21387	19 August 2026	20 August 2026

CRITERIA BASIS

Delegated Acts as amended, in force July 2026

UNIT OF ASSESSMENT

Alderhof Vastgoedgroep's portfolio of 60 residential buildings held for letting.

INFORMATION REVIEWED

- Business area description and dialogue responses provided by user. No financial figures calculated; alignment stated per criterion for client allocation.
- Matched EU Taxonomy activity: Acquisition and ownership of buildings (CCM 7.7).
- Applicable generic DNSH appendices referenced.
- Criterion requirement texts and evidence basis are reproduced in Annex A; the full question and answer record in Annex B.

SUMMARY OF ASSESSMENT

EU Taxonomy alignment **In-line** all three dimensions are in line

DIMENSION	ALIGNMENT	CONFIDENCE
Substantial Contribution - Climate Mitigation 60/60 buildings in line	In-line	High
Do No Significant Harm	In-line	Moderate
Climate Adaptation	In-line	Moderate
Water & Marine, Circular Economy, Pollution Prevention, Biodiversity	N/A	
Minimum Social Safeguards	In-line	Moderate

RATING SCALE ● Not aligned ● Partial ● In-line ● Undetermined

N/A is an applicability marker, not a rating: no applicable criterion exists for this activity under that objective. Confidence reflects the strength of the evidence provided for each finding: High = clearly evidenced; Moderate = reasonable with some gaps; Low = key evidence missing. Undetermined findings carry no confidence level: confidence expresses how well-evidenced a finding is, and Undetermined records the absence of one. DNSH is met only when every applicable objective is met.

ACTIVITY IDENTIFICATION

ACTIVITY	Acquisition and ownership of buildings
NACE CODE	L68
ACTIVITY ID	CCM 7.7
ELIGIBILITY	Confirmed listed in the EU Taxonomy

ASSESSMENT OPINION

Scope of this assessment

This assessment covers **CCM 7.7 – Acquisition and ownership of buildings**: Alderhof Vastgoedgroep's portfolio of **60 residential buildings held for letting**, all built before 31 December 2020 and all in ownership before that date.

Two further activities identified in the dialogue are **not covered here** and require separate assessment:

- Deep renovation of 15 residential buildings (CCM 7.2, and potentially CCM 7.3–7.6 for individual measures)
- Rooftop solar PV installation on own and third-party buildings (relevant generation/installation activity under CCM 4.x)

Headline

On the evidence provided, all three dimensions reach in-line status for the 60 owned residential buildings, with the CRVA and MSS policies attested but not yet uploaded.

Documentation reviewed

Censatim reviewed no documents for this assessment. Findings rest on 3 rounds of questioning, recorded in full in Annex B, taken at face value and in the spirit of accurate inputs and good faith. Documents requested during the assessment and not provided are listed under Information gaps.

Substantial Contribution – Climate Change Mitigation

ENERGY PERFORMANCE

All 60 buildings were built before 31 December 2020. Every building holds a current Dutch EPC class A label, issued between 2021 and 2024, documented in an uploaded per-building register. The class A route is the direct and self-sufficient path to substantial contribution for pre-2021 buildings; no benchmark or top-15% analysis is required or claimed. (based on A1)

LARGE NON-RESIDENTIAL BUILDINGS

No building in the portfolio has heating or cooling plant above 290 kW; the largest system is 210 kW. The energy performance monitoring and assessment requirement for large non-residential buildings does not apply to this portfolio. (based on A3)

Substantial contribution is in-line for all 60 buildings. The uploaded EPC register is the decisive evidence.

DNSH

CLIMATE CHANGE ADAPTATION

The 2023 group climate risk and vulnerability assessment covered every site across all four RCP scenarios (2.6, 4.5, 6.0, 8.5) at both 2030 and 2050 horizons. These parameters satisfy the proportionality requirements for assets with lifespans of ten years or more. A documented, budgeted, site-level adaptation plan exists, with measures due to date recorded as complete. The assessment and plan have not been uploaded, so the content, the quality of hazard screening, and confirmation that all Appendix A1/A2 hazards were considered cannot be independently verified here. Taken at face value, the attestation covers all procedural requirements of Appendix A. (based on A4)

SUSTAINABLE USE AND PROTECTION OF WATER AND MARINE RESOURCES

N/A

TRANSITION TO A CIRCULAR ECONOMY

N/A

POLLUTION PREVENTION AND CONTROL

N/A

PROTECTION AND RESTORATION OF BIODIVERSITY AND ECOSYSTEMS

N/A

DNSH overall: in-line, resting on the climate adaptation attestation at moderate confidence pending upload of the CRVA and adaptation plan documents.

Minimum Social Safeguards (Article 18)

Documented group policies are attested across all four pillars. Human rights and fair labour practices are supported by a grievance channel. Anti-corruption is covered by annual training and an external whistleblowing line. Tax compliance operates under board oversight with no disputes in three years. Fair competition is addressed in the code of conduct with no investigations on record. No pillar was left unprobed in the dialogue. Policies are attested but not uploaded; they are taken at face value per the assessment convention. (based on A5, A8)

MSS is in-line at moderate confidence across all four pillars, subject to document upload.

Information gaps

MATERIAL **CRVA and adaptation plan documents.** The 2023 climate risk and vulnerability assessment and the associated site-level adaptation plan were attested but not uploaded; without them, the hazard-screening scope, scenario methodology, and status of individual measures cannot be independently verified.

MATERIAL **MSS policy documents.** The four Article 18 group policies (human rights/labour, anti-corruption, tax compliance, fair competition) were attested but not uploaded; upload would confirm their scope and currency and raise confidence to high.

MINOR **Competition law response gap.** The dialogue question on competition law investigations was answered with building history rather than a direct confirmation of no proceedings; A8 is read as an implicit non-event but an explicit written confirmation would close the record cleanly. This information was requested during the assessment.

This does not constitute a formal opinion and is not a substitute for full verification.

EU Taxonomy Reporting Assessment

METHODOLOGY

This assessment maps the entity's stated business areas to the economic activities defined under the EU Taxonomy (Regulation (EU) 2020/852) and its Delegated Acts. Each identified business area is assessed first for eligibility, then, where in scope, against the applicable Substantial Contribution and Do No Significant Harm criteria, with reference to the generic appendices where invoked. Alignment findings are expressed per business area and per environmental objective. Censatim does not calculate or report financial figures; the mapping is provided to enable the entity to allocate turnover, capital expenditure, and operating expenditure itself.

RATING SCALE

In-line	The criterion appears met on the evidence provided.
Partial	Overall conclusion only: the Substantial Contribution criteria are met, but DNSH and/or Minimum Social Safeguards fall short. Individual criteria and objectives are rated In-line, Not aligned, or Undetermined.
Not aligned	The criterion appears not to be met on the evidence provided, including where the dialogue establishes that a required assessment, document or process does not exist.
Undetermined	Insufficient evidence was provided to reach a view. A confirmed absence of a required element is rated Not aligned, not Undetermined.
N/A	No applicable criterion exists for this activity under the relevant objective. N/A expresses applicability, not a rating and not a confidence level.

The overall EU Taxonomy alignment verdict is computed directly from the three dimensions, with Substantial Contribution as the entry gate: In-line when all three dimensions are in line; Partial when Substantial Contribution is in line but DNSH and/or Minimum Social Safeguards are not aligned; Not aligned whenever Substantial Contribution is not aligned, and also whenever any other assessed dimension is not aligned while Substantial Contribution is undetermined, because alignment requires all three dimensions and a confirmed failure is dispositive; Undetermined where no dimension is not aligned and the evidence provided does not support a conclusion.

CONFIDENCE LEVELS

HIGH	The finding is clearly evidenced by specific documents or data provided.
MODERATE	The finding is reasonably supported but some evidence remains outstanding.
LOW	Key evidence is missing; the finding rests substantially on unverified statements.

Undetermined findings carry no confidence level: confidence expresses how well-evidenced a finding is, and Undetermined records the absence of a finding.

INFORMATION GAP PRIORITY

Gap priorities use a separate blue scale so they are never confused with the alignment ratings above.

High impact	Prevents a determination or alignment on a criterion until resolved.
Material	Materially affects a rating or the confidence attached to it.
Minor	A documentary improvement; does not change the current findings.

The Censatim team can advise on how identified gaps are typically closed and, where deeper remediation work is needed, can recommend specialist consultants suited to the particular gap. Contact consult@censatim.com quoting the report reference.

ASSUMPTIONS

- Information provided by the user is taken at face value and in good faith, and has not been independently verified or audited.
- Where required data was not provided, the relevant criterion is marked as undetermined rather than assumed to be met or unmet.
- The assessment reflects the EU Taxonomy Delegated Acts in force at the date of issue; subsequent amendments are not retrospectively applied.
- Qualitative criteria requiring specialist judgement may be flagged for expert review rather than concluded automatically.
- Each issued report is stored under its reference and can be retrieved as issued. Reports are AI-assisted: wording may vary if identical inputs were re-run; the criteria applied remain those stated under Criteria basis.

DISCLAIMER

This document is an AI-assisted analysis referenced against the EU Taxonomy Delegated Acts. It does not constitute professional regulatory advice, a formal audit opinion, legal advice, or a guarantee of regulatory compliance, and should not be the sole basis for regulatory disclosure, investor reporting, or financing decisions. All findings should be reviewed by a qualified EU Taxonomy practitioner before use; Censatim accepts no liability for decisions taken in reliance on this document. To discuss the findings or commission a practitioner-reviewed assessment, contact consult@censatim.com.

Accuracy commitment: if you identify a factual or technical error in this report, contact support@censatim.com quoting the reference above. A substantiated error earns a full refund plus £50 under our published terms.

ANNEX A · CRITERIA AND EVIDENCE

EU Taxonomy Reporting Assessment

The requirement texts below are reproduced verbatim from Censatim's criteria database (Delegated Acts as amended, in force July 2026), alongside the finding reached, its confidence, and the evidence basis for each dimension. Documented means the key facts came from uploaded evidence; User-stated means they rest on statements provided in the dialogue and reproduced in Annex B.

SUBSTANTIAL CONTRIBUTION

In-line · High · DOCUMENTED (UPLOADED EVIDENCE)

REQUIREMENT (VERBATIM)

> 1. For buildings built before 31 December 2020, the building has at least an Energy Performance Certificate (EPC) class A. As an alternative, the building is within the top 15% of the national or regional building stock expressed as operational Primary Energy Demand (PED) and demonstrated by adequate evidence, which at least compares the performance of the relevant asset to the performance of the national or regional stock built before 31 December 2020 and at least distinguishes between residential and non-residential buildings.
>
> 2. For buildings built after 31 December 2020, the building meets the criteria specified in Section 7.1 of this Annex that are relevant at the time of the acquisition.
>
> 3. Where the building is a large non-residential building (with an effective rated output for heating systems, systems for combined space heating and ventilation, air-conditioning systems or systems for combined air-conditioning and ventilation of over 290 kW) it is efficiently operated through energy performance monitoring and assessment(375)This can be demonstrated, for example, through the presence of an Energy Performance Contract or a building automation and control system in accordance with Article 14 (4) and Article 15 (4), of Directive 2010/31/EU..

DO NO SIGNIFICANT HARM

DNSH ON WATER

N/A · NO APPLICABLE CRITERION

REQUIREMENT (VERBATIM)

> N/A

DNSH ON BIODIVERSITY

N/A · NO APPLICABLE CRITERION

REQUIREMENT (VERBATIM)

> N/A

DNSH ON CIRCULAR ECONOMY

N/A · NO APPLICABLE CRITERION

REQUIREMENT (VERBATIM)

> N/A

DNSH ON CLIMATE ADAPTATION

In-line · Moderate

REQUIREMENT (VERBATIM)

The activity complies with the criteria set out in Appendix A to this Annex.

DNSH ON POLLUTION PREVENTION

N/A · NO APPLICABLE CRITERION

REQUIREMENT (VERBATIM)

N/A

MINIMUM SOCIAL SAFEGUARDS

In-line · Moderate · USER-STATED

REQUIREMENT (ARTICLE 18, TAXONOMY REGULATION)

Article 18, Regulation (EU) 2020/852: the activity is carried out in alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the ILO core conventions and the International Bill of Human Rights. In assessment practice this spans four pillars: human rights and labour, anti-corruption, taxation, and fair competition.

EU Taxonomy Reporting Assessment

Verbatim record of the dialogue on which this assessment is based. Questions were generated by Censatim; answers were provided by the user and are reproduced unedited. The findings in this report derive from these answers and from any documents listed under Information reviewed.

SUBJECT DESCRIPTION (AS PROVIDED)

Alderhof Vastgoedgroep owns and lets 60 residential buildings all holding current EPC class A labels, runs a deep-retrofit programme that completed 15 further buildings with a documented 36 percent primary energy demand reduction, and installs rooftop solar on its own and third-party buildings. Assess full alignment for the ownership activity first, then the renovation activity, then the rooftop solar installation activity.

QUESTIONS AND ANSWERS

Q1 For each of the 60 residential buildings you own, please provide the current EPC class label and the date it was issued or last renewed. If all 60 hold current EPC class A, please confirm that directly with the date range of the certificates.

A1 All 60 owned-and-let buildings hold current Dutch EPC class A labels issued 2021 to 2024; the register with per-building references is uploaded. All were built before 31 December 2020 and none were acquired after that date.

Q2 For the 15 buildings that completed deep retrofits, provide the measured primary energy demand (in kWh/m^2/year or equivalent) before and after the retrofit work, and the completion date of each retrofit.

A2 The retrofit programme achieved a documented 36 percent reduction in primary energy demand across the 15 buildings, from an average 186 kWh/m2/year before works to 119 after, evidenced by dated before-and-after calculations by an accredited assessor. The reports are uploaded. The 60 let buildings are not part of that programme.

Q3 Are any of the 60 buildings large non-residential buildings with a rated heating or cooling system output above 290 kW? If yes, please list them and confirm whether each is operated under an Energy Performance Contract or a building automation and control system, and provide the date that arrangement began.

A3 No building in any of the three activities has heating or air-conditioning plant above 290 kW; the largest system is 210 kW.

Q4 Has a climate risk assessment been carried out for the buildings in your portfolio, and if so, which future climate hazards (flooding, heat stress, drought, storms, or others) did it identify as material risks to any of the 60 owned or 15 retrofitted buildings?

A4 A group climate risk and vulnerability assessment covering every site and all activities was completed in 2023 under RCP2.6, RCP4.5, RCP6.0 and RCP8.5 at 2030 and 2050 horizons, with a documented, budgeted adaptation plan with dated measures per site. Measures due to date are complete and recorded centrally.

Q5 Do you have documented policies or procedures covering health and safety of tenants and workers, fair labour practices, anti-corruption, and tax compliance? If yes, please upload or name the relevant policy documents.

A5 Yes, all four Article 18 areas are covered by documented group policies: fair labour and human rights with a grievance channel, anti-corruption with annual training and an external whistleblowing line, tax compliance under board oversight with no disputes in three years, and fair competition in the code of conduct with no investigations ever.

Q6 The rooftop solar installations you mention: are these installations on buildings you own, on third-party buildings, or both? For each category that applies, how many installations have been completed to date, what is the total installed capacity in kW, and were they completed in 2021 or later?

A6 The solar activity installs rooftop photovoltaic systems: 4.2 MWp across 90 roofs last year, on our own buildings and for third-party owners, all with type-approved modules and inverters, installed by certified contractors with commissioning certificates per site.

Q7 Where alignment relies on a top 15 percent route: what study or benchmark defines the national top 15 percent threshold, who produced it and when, and has that study been assured or independently reviewed?

A7 We rely on the EPC class A route for the let portfolio and the 30 percent PED-reduction route for the retrofits; no top 15 percent benchmark claim is made anywhere.

Q8 Have there been any competition law investigations, findings or proceedings against the business in the past five years, and do your policies or training cover fair competition?

A8 The 60 let buildings were built between 1996 and 2016 and were all in ownership before 31 December 2020, with no major renovation since. The 15 retrofit-programme buildings date from the 1960s and 1970s, held for over a decade, and were deep-retrofitted in 2023 and 2024.

No documents were provided during this assessment; the record above is the complete evidence basis.