#### Disclaimer

This document has been prepared solely for the purpose of providing U.K. and Dutch investors with certain information under Article 23 of the European Alternative Investment Fund Managers Directive (European Directive 2011/61/EU) (the "AIFMD") as implemented in their respective jurisdictions. Accordingly, you should not use this document for any other purpose.

### European Economic Area Investors

The Directive 2011/61/EU (the "Alternative Investment Fund Managers Directive", or the "AIFMD"), was adopted on June 8, 2011 and was required to be implemented by each Member State of the EEA into its national legislation by July 22, 2013. The units of INV may not be marketed (within the meaning given to the term "marketing" under the AIFMD), and the Communication may not be conducted, to prospective investors domiciled or with a registered office in any Member State of the EEA unless: (i) the units of INV may be marketed under any national private placement regime (including under the AIFMD) or other exemption in that Member State; or (ii) the units of INV can otherwise be lawfully marketed or sold in that Member State in circumstances in which the AIFMD does not apply, provided that any such offer or sale is not made to a retail investor as described above. We have made a notification to each of the Netherlands Authority for the Financial Markets and the United Kingdom Financial Conduct Authority pursuant to Article 42 of the AIFMD in order to market the units of INV in the Netherlands and the United Kingdom, respectively.

# Prohibition of Sales to EEA Retail Investors

In addition to the restrictions under the AIFMD, the units of Invincible Investment Corporation ("INV" or the "AIF") are not intended to be offered, sold or otherwise made available to and should not be offered, sold or otherwise made available to any retail investor in the European Economic Area, or the EEA. For these purposes, a retail investor means a person who is one (or more) of: (i) a retail client as defined in point (11) of Article 4(1) of Directive 2014/65/EU, as amended, or the MiFID II; or (ii) a customer within the meaning of Directive (EU) 2016/97, where that customer would not qualify as a professional client as defined in point (10) of Article 4(1) of MiFID II; or (iii) not a qualified investor as defined in Regulation (EU) 2017/1129, as amended, the Prospectus Regulation. Consequently no key information document required by Regulation (EU) No 1286/2014, or the PRIIPs Regulation, for offering or selling the units of INV or otherwise making them available to retail investors in the EEA has been prepared and therefore offering or selling the units of INV, or otherwise making them available, to any retail investor in the EEA may be unlawful under the PRIIPs Regulation.

# **United Kingdom**

The units of INV are being marketed in the United Kingdom pursuant to Article 59 of the United Kingdom Alternative Investment Fund Managers Regulations 2013. In accordance with this provision, Consonant Investment Management Co., Ltd. (the "AIFM") has notified the Financial Conduct Authority (the "FCA") of its intention to offer these units in the United Kingdom. For the purposes of the United Kingdom Financial Services and Markets Act 2000 ("FSMA") INV is an unregulated collective investment scheme which has not been authorized by the FCA. Accordingly, any communications of an invitation or inducement to invest in INV may be made only to: (i) investment professionals falling within Article 19(5) of the Financial Services and Markets Act 2000 (Financial Promotion) Order 2005, as amended, or the Order; (ii) high net worth companies, unincorporated associations or other entities falling within Articles 49(2)(a) to (d) of the Order; or (iii) other persons to whom it may lawfully be communicated (all such persons together being referred to as "Relevant Persons"). In the United Kingdom, this document and its contents are directed only at Relevant Persons and must not be acted on or relied on by persons who are not Relevant Persons. The transmission of this document and its contents in the United Kingdom to any person other than a Relevant Person is unauthorized and may contravene the FSMA and other United Kingdom securities laws and regulations.

# Prohibition of Sales to UK Retail Investors

In addition to the restrictions under the AIFMD, as retained by the United Kingdom in its domestic laws, the Units of INV are not intended to be offered, sold or otherwise made available to and should not be offered, sold or otherwise made available to any retail investor in the United Kingdom. For these purposes of this provision, a "retail investor" means a person who is one (or more) of: (i) a retail client, as defined in point (8) of Article 2 of Regulation (EU) No 2017/565 as it forms part of domestic law by virtue of the European Union (Withdrawal) Act 2018 ("EUWA"); or (ii) a customer within the meaning of the provisions of the FSMA and any rules or regulations made under the FSMA to implement Directive (EU) 2016/97, where that customer would not qualify as a professional client, as defined in point (8) of Article 2(1) of Regulation (EU) No 600/2014 as it forms part of domestic law by virtue of the EUWA; or (iii) not a qualified investor as defined in Article 2 of Regulation (EU) 2017/1129, as it forms part of domestic law by virtue of the EUWA; and the expression "offer" includes the communication in any form and by any means of sufficient information on the terms of the offer and the international units to be offered so as to enable an investor to decide to purchase or subscribe the international units.

Consequently no key information document required by Regulation (EU) No 1286/2014, as it forms part of domestic law by virtue of the EUWA (the "UK PRIIPs Regulation"), for offering or selling

the international units or otherwise making them available to retail investors in the United Kingdom has been prepared and therefore offering or selling the international units or otherwise making them available to any retail investor in the United Kingdom may be unlawful under the UK PRIIPs Regulation.

### Netherlands

The units of INV are being marketed in the Netherlands under Section 1:13b of the Dutch Financial Supervision Act (*Wet op het financieel toezicht*, or the "Wft"). In accordance with this provision, the AIFM has notified the Dutch Authority for the Financial Markets of its intention to offer these units in the Netherlands. The units of INV will not, directly or indirectly, be offered, sold, transferred or delivered in the Netherlands, except to or by individuals or entities that are qualified investors (*gekwalificeerde beleggers*) within the meaning of Article 1:1 of the Wft. and as a consequence neither the AIFM nor INV is subject to the license requirement pursuant to the Wft. Consequently, neither the AIFM nor INV is subject to supervision of the Dutch Central Bank (De Nederlandsche Bank, "DNB") or the Netherlands Authority for Financial Markets (Autoriteit Financiële Markten, the "AFM") and this Article 23 AIFMD Prospectus is not subject to approval by the AFM. No approved prospectus is required to be published in the Netherlands pursuant to Article 3 of the Regulation (EU) 2017/1129 as amended and applicable in the Netherlands. The AIFM is therefore solely subject to limited ongoing regulatory requirements as referred to in Article 42 of the AIFMD.

Article 23 (1)(a)		
Objectives of the AIF	INV seeks to achieve distribution growth and enhancement of unitholders' value by building a balanced portfolio composed primarily of hotels, including limited service hotels, full service hotels and resort hotels, and residential properties, which together constitute INV's "core assets". By achieving such balance, INV seeks to optimize the mix of stability associated with residential properties and growth opportunities arising from investments in hotels.	
Investment strategy	In addition to investing in and growing a balanced portfolio composed primarily of hotels and residential properties, INV seeks to:  • utilize resources and pipeline support of Fortress Investment Group LLC and its affiliates (collectively, the "Fortress Group", which sponsors INV and is part of Mubadala Investment Company);  • source attractive properties using Consonant Investment Management Co., Ltd.'s (the "Asset Manager") information network; and  • utilize comprehensive hotel operational expertise of Iconia Hospitality K.K. ("ICN").	
Types of assets the	Real estate, including trust beneficiary interests in real estate, securities	
AIF may invest in	backed by real estate, specified assets and other assets, including any of the foregoing assets governed by foreign laws and regulations, as well as equity interests in corporations holding overseas real estate.	
Techniques it may	INV invests primarily in hotels and residential properties, while also making	
employ and all associated risks	investments in select office buildings, retail properties and parking facilities, to achieve distribution growth and enhancement of unitholders' value.	
	The principal risks with respect to investment in INV are as follows:  Property and Business Risks  Any adverse conditions in the Japanese economy could adversely affect	
	INV's properties.	
	<ul> <li>An epidemic such as SARS, MERS and COVID-19 may have a significant long-term adverse impact on economic activities, including as a result of self-isolation measures, which in turn may adversely affect the operators' profitability, performance of INV's portfolio and market price of its units.</li> <li>INV may not be able to acquire properties to execute its growth and</li> </ul>	

- investment strategy in a manner that is accretive to earnings.
- INV's reliance on Fortress Group could have a material adverse effect on its business.
- INV's investment in the Cayman Islands hotels exposes it to risks
  inherent in investment in overseas properties, including operational risks
  due to its limited experience in operating properties outside of Japan,
  exposure to the economic, market and environmental conditions in the
  Cayman Islands and foreign exchange risk.
- INV's strategy to acquire properties outside of Japan may expose it to additional risks.
- As a large portion of INV's hotels are subject to a variable rent structure, its results of operations are inherently more volatile than the results of properties with fixed-rent lease arrangements, and INV may not be able to effectively manage its hotel portfolio due to its relatively limited operating history in owning full service hotels and resort hotels that it may decide to acquire in greater numbers in the future.
- INV may not close its anticipated or other future property acquisitions.
- Increases in prevailing market interest rates, particularly following the Bank of Japan's announcement of a major new policy for monetary easing, would increase INV's interest expense and may result in a decline in the market price of its units.
- The relatively high geographic concentration of INV's real estate portfolio in the greater Tokyo area and other major cities could have a material adverse effect on its business.
- Competition for tenants and hotel guests may adversely affect INV's ability to retain its current tenants and find new tenants, and to maintain occupancy rates and revenue.
- INV's domestic hotels are subject to the operating risks common to the hospitality industry, which have a direct effect on the variable rent component of its portfolio's revenue.
- The cyclical and seasonal nature of the hospitality industry may cause fluctuations in INV's operating performance, which could have a material adverse effect on it and its variable rent revenues.
- INV may incur unexpected expenses, expenditure or other losses for repair or maintenance of its properties, and its hotels require periodic capital reinvestment for renovation.

- The majority of INV's hotels are leased to ICN or its subsidiaries which are owned by Fortress Group-managed funds, and subject to the risk of default under their hotel lease agreements.
- INV's focus on residential properties could have a material adverse effect on its business.
- INV may lose rental revenues in the event of defaults by end-tenants under their lease agreements for properties other than hotels.
- Master leases may give rise to certain risks.
- INV may suffer large losses if any of its properties incur damage from a natural or man-made disaster or acts of violence.
- INV may be liable for an unforeseen loss, damage or injury suffered by a third party at its properties.
- Because most of INV's operating expenses are largely fixed, it may suffer adverse consequences if its rental revenues decline.
- INV may not be able to promptly acquire suitable properties or sell those
  in its portfolio on acceptable terms in response to changing economic,
  financial or investment conditions.
- Defects or problems relating to INV's properties, including nonconformity to agreements, may adversely affect its financial condition and results of operations.
- INV relies on expert appraisals and engineering, environmental and seismic reports, which are subject to significant uncertainties.
- The environmental assessments of INV's properties made prior to its
  ownership may not have uncovered all environmental liabilities, and
  Japanese laws and other overseas laws subject property owners to strict
  environmental liabilities.
- Decreases in tenant leasehold and/or security deposits would increase INV's funding costs.
- Any inability to obtain financing for future acquisitions, or any restrictions on INV's activities under its financing arrangements, could adversely affect INV.
- A high LTV ratio may increase INV's exposure to changes in interest rates and have a material adverse effect on its results of operations.
- INV may suffer impairment losses relating to its properties and may also suffer adverse tax effects upon recognizing impairments.
- The performance of Fortress Group is not an indicator or guarantee of

- INV's future results.
- INV's financial statements are prepared in accordance with Japanese GAAP, which differs in certain material respects from IFRS, U.S. GAAP and generally accepted accounting principles and financial reporting standards in other jurisdictions.
- INV relies on industry and market data that are subject to significant uncertainties.
- INV may be exposed to risks relating to investments in the operators or master lessees of its properties.

# **Management and Governance Risks**

- INV's success depends on the performances of service providers to which it is required to assign various key functions.
- There are potential conflicts of interest between INV and certain Fortress Group affiliates or Fortress Group-related companies including the Asset Manager, ICN.
- INV depends on the efforts of its executive director and key personnel of the Asset Manager.
- Unitholders have limited control over INV's policies.
- The Japanese regulatory authorities have tightened regulatory supervision of J-REITs and their asset managers and their corporate governance.
- If unitholders do not exercise their voting rights, INV may count their votes in favor of proposals at a general meeting of unitholders.

# **Taxation Risks**

- INV's failure to satisfy a complex series of requirements pursuant to
  Japanese tax regulations would disqualify INV from certain taxation
  benefits and significantly reduce its distributions to its unitholders.
- If the Japanese tax authorities disagree with the interpretations INV used for prior periods, it may be forced to pay additional taxes for those periods.
- INV may not be able to benefit from reductions in certain real estate taxes enjoyed by qualified J-REITs.
- Changes in Japanese tax laws may significantly increase INV's tax burden.
- INV may be subject to taxes in countries other than Japan due to its investments outside of Japan and investors may not be able to take

- advantage of available credits associated with such taxes.
- INV's distributions may decrease due to reversals of allowance for temporary differences adjustment.
- INV expects to be treated as a "passive foreign investment company" for U.S. federal income tax purposes.
- Unitholders may become subject to U.S. Foreign Account Tax
   Compliance Act (FATCA) withholding tax.

# Legal and Regulatory Risks

- INV's ownership rights in some of its properties may be declared invalid or limited.
- INV's may lose its rights in a property it owns if the purchase of the property is recharacterized as a secured financing.
- Acquisition of properties for which third parties hold leasehold interests in the land and own the buildings may subject INV to various risks.
- INV's leasehold interests may be terminated or may not be asserted against a third party in some cases, or its leases with its tenants could be modified.
- INV currently hold interests in Sheraton Grande Tokyo Bay Hotel through, and may make further investments in, preferred equities of a TMK (tokutei mokuteki kaisha), and illiquidity in the market for such equities may limit its ability to sell its interests, and INV is exposed to risks unique to this investment structure.
- INV may hold interests in some properties through Japanese anonymous association (tokumei kumiai) agreements.
- INV currently holds several properties in the form of compartmentalized ownership interests (kubun shoyu-ken) and its rights relating to such properties may be affected by the intentions of other owners.
- INV may acquire properties in the form of co-ownership (kyoyu) and its
  rights relating to such properties may be affected by the intentions of
  other owners.
- Tax increases or adverse changes in applicable laws may affect INV's potential liabilities relating to its properties and operations.
- Compliance with energy conservation regulations in Japan may adversely affect INV's financial results.
- INV's costs of complying with regulations applicable to its properties could adversely affect its results of operations.

INV owns a substantial portion of its properties through trust beneficiary interests and may suffer losses as a trust beneficiary. The Alternative Investment Fund Managers Directive (AIFMD) may adversely affect INV's ability to market its units in the EEA and increase its compliance costs associated with the marketing of its units in the EEA. INV's assets may be deemed to constitute "plan assets" for ERISA purposes, which may lead to the rescission of certain transactions, tax or fiduciary liability and its being held in violation of ERISA requirements. Any applicable INV is subject to investment restrictions under Japanese laws and regulations investment restrictions (e.g., the Act on Investment Trusts and Investment Corporations (the "ITA"), the Financial Instruments and Exchange Act (the "FIEA")) as well as its articles of incorporation. INV must invest primarily in specified assets as defined in the ITA. Specified assets include, but are not limited to, securities, real estate, leaseholds of real estate, surface rights (chijō-ken) (i.e., right to use land for the purpose of having a structure on it) or trust beneficiary interests for securities or real estate, leaseholds of real estate or surface rights. Furthermore, a listed J-REIT must invest substantially all of its assets in real estate, real estate-related assets and liquid assets as provided by the listing requirements. Real estate in this context includes, but is not limited to, real estate, leaseholds of real estate, surface rights, and trust beneficiary interests for these assets, and real estate-related assets in this context include, but not limited to, anonymous association (tokumei kumiai) interests for investment in real estate. Pursuant to the ITA, investment corporations may not independently develop land for housing or to construct buildings, but may outsource such activities in certain circumstances. The investment by the AIF must be made in accordance with the basic investment policy as set out in its articles of incorporation. Circumstances in INV may take out loans or issue investment corporation bonds (including which the AIF may use short-term corporation bonds) for the purpose of, among other things, leverage acquiring assets, repair or distribution payments and acquiring operational funding or procuring funds for debt repayment, which are conducive to the efficient management of investment assets and the stability of management. The types and sources INV may take out loans or issue investment corporation bonds for financing its

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under the ITA and INV's articles of incorporation, unitholders who do not attend and exercise their voting rights at a general meeting of unitholders are deemed to be in agreement with proposals submitted at the meeting, except in cases where contrary proposals are also being submitted or cases regarding (i) dismissal of an executive director or supervisory director, (ii) consent to the termination of the asset management agreement by the Asset Manager, (iii) termination of the asset management agreement by INV, (iv) addition, amendment or abolition of the provisions related to deemed affirmative vote in the articles of incorporation or (v) dissolution of INV. Additionally, the guidelines of the AIFM, which provide more detailed policies within INV's overall investment strategy and policy, can be modified without such formal amendment of the articles of incorporation.

# Article 23(1) (c)

Description of the main legal implications of the contractual relationship entered into for the purpose of investment, including jurisdiction, applicable law, and the existence or not of any legal instruments providing for the recognition and enforcement of judgments in the territory where the AIF is established

INV is a corporate-type investment trust in the form of investment corporation (toshi hojin) provided for under the ITA. Therefore, the relationship between INV and its unitholders is governed by INV's articles of incorporation (as opposed to individual agreements), which can be amended from time to time upon resolution of a general unitholders' meeting. INV's articles of incorporation stipulate rules relating to general unitholders meetings, including the convocation, setting of record date, exercise of voting rights, resolutions and election of INV's directors.

The relationship between INV and its unitholders is also governed by, and is

subject to the provisions of, Japanese law, including the ITA.

The courts in Japan would recognize as a valid judgment any final and conclusive civil judgment for monetary claims (which, for this purpose, are limited to those of a purely civil nature and do not include monetary claims of the nature of criminal or administrative sanction, such as punitive damages, even though they take the form of civil claims) against INV obtained in a foreign court provided that (i) the jurisdiction of such foreign court is admitted under the laws of Japan, (ii) INV has received service of process for the commencement of the relevant proceedings, otherwise than by a public notice or any method comparable thereto, or has appeared without any reservation before such foreign court, (iii) neither such judgment nor the relevant proceeding is repugnant to public policy as applied in Japan, (iv) there exists reciprocity as to the recognition by such foreign court of a final judgment obtained in a Japanese court and (v) there is no conflicting judgement on the

subject matter by any Japanese court.

The AIFM has entered into a sponsor support agreement with Fortress Investment Group Japan Godo Kaisha.

The above agreement is governed by Japanese law.

INV is not involved in or threatened by any legal arbitration, administrative or other proceedings, the results of which might, individually or in the aggregate, be material.

### Article 23(1) (d)

The identity of the
AIFM, AIF's
depositary, auditor
and any other service
providers and a
description of their
duties and the
investors' rights
thereto

 AIFM (Asset Manager) / General Administrator: Consonant Investment Management Co., Ltd.

The Asset Manager provides the services including asset management, financing, investor relations and financial reporting, and operational planning.

The General Administrator provides administrative services to us, including administration of unitholder meetings (excluding services related to distribution of documents for the unitholders' meeting and acceptance and tabulation of the voting ballots) and administration of board meetings.

- Auditor: Ernst & Young ShinNihon LLC
   The independent auditor audits financial statements and prepare audit reports.
- Asset Custodian / Unitholders' Register Administrative Agent / Special Accounts Administrator: Sumitomo Mitsui Trust Bank, Limited ("SMTB")
   The Asset Custodian provides custodial services to us, including custody of our assets.

The Unitholders' Register Administrative Agent provides administrative services to us, including creation, administration and custody of the unitholders' register and related documents.

The Special Accounts Administrator provides administrative services to us, including the preparation, management and custody of the transfer account book and other services in relation to the special accounts of pre-merger unitholders of LCP.

 Special Accounts Administrator: Mitsubishi UFJ Trust and Banking Corporation ("MUTB")

The Special Accounts Manager provides administrative services to us,

including the preparation, management and custody of the transfer account register and collection, registration, custody, use, removal and deletion of the individual number and other information in relation to the special accounts of pre-merger unitholders of us.

- Accounting Administrator: SMTB
   The Accounting Administrator provides administrative services to us, including administration of accounting matters, preparation of accounting books and tax-related services.
- General Administrative Agent (Corporation Bonds): Mizuho Bank, Ltd.
   The General Administrative Agent (Corporation Bonds) provides
   administrative services related to Corporation Bonds.

INV relies on Consonant Investment Management Co., Ltd. to manage its operations, to formulate and implement strategies to achieve its investment objectives and to administer unitholder meeting and board meetings. Ernst & Young ShinNihon LLC is INV's independent auditor and audits INV's financial statements. SMTB provides custodian services and certain administrative services to INV, including custody of its assets, creation of the unitholders' register and preparation of the transfer account book in relation to the special accounts of pre-merger unitholders of LCP Investment Corporation ("LCP"). MUTB provides certain administrative services to INV, including the custody of the transfer account register in relation to the special accounts of pre-merger unitholders of INV. SMTB provides certain administrative services to INV, including the administration of accounting matters and preparation of accounting books.

Service providers owe contractual obligations under their respective agreements with the AIF or the AIFM, as the case may be. In addition, the FIEA provides that the Asset Manager owes the AIF a fiduciary duty and must conduct its activities as the Asset Manager in good faith. The FIEA also prohibits the Asset Manager from engaging in certain specified conduct, including entering into transactions outside the ordinary course of business or with related parties of the Asset Manager that are contrary to or violate the AIF's interests. Pursuant to the ITA, the unitholders have the right to approve the execution or termination of the asset management agreement at a general meeting of unitholders.

	The unithalders do not have any contractival relative with INV 8-2-2
	The unitholders do not have any contractual relationship with INV's service
	providers and therefore will not be able to bring any contractual claims against
	a service provider.
Article 23(1) (e)	
Description of how the	Not applicable.
AIFM complies with	
the requirements to	
cover professional	
liability risks (own	
funds / professional	
indemnity insurance)	
Article 23(1) (f)	
Description of any	Not applicable. There is no delegation of such functions beyond the AIFM,
delegated	which is responsible for portfolio and risk management, and the asset
management function	custodian, which is responsible for safekeeping activities.
such as portfolio	
management or risk	
management and of	
any safekeeping	
function delegated by	
the depositary, the	
identification of the	
delegate and any	
conflicts of interest	
that may arise from	
such delegations	
Article 23(1) (g)	
Description of the	INV makes investment decisions based on the valuation of properties, upon
AIF's valuation	consideration of the property appraisal value. INV evaluates assets in
procedure and pricing	accordance with its articles of incorporation. The methods and standards that
methodology,	INV uses for the evaluation of assets are based on the Regulations
including the methods	Concerning the Calculations of Investment Corporations, as well as the
used in valuing hard-	Regulations Concerning Real Estate Investment Trusts and Real Estate
to-value assets	Investment Corporations and other regulations stipulated by ITA, in addition to
	Japanese GAAP. J-REITs may only use the valuation methods prescribed in
	the rules of the Investment Trusts Association, Japan, which emphasize

	market price valuation.	
Article 23(1) (h)		
Description of the	INV seeks to manage its capital resources and liquidity sources to provide	
AIF's liquidity risk	adequate funds for current and future financial obligations and other cash	
management,	needs and acquisitions.	
including redemption	Net cash provided by operating activities constitutes INV's primary source of	
rights in normal and	iquidity to fund distributions, interest payments on loans payable, fees to the	
exceptional	Asset Manager and other service providers, property-related taxes, repairs	
circumstances and	and maintenance, and capital expenditures for its properties in the ordinary	
existing redemption	course of business. INV's liquidity risks are managed by the Asset Manager	
arrangements with	by preparing monthly plans for funds, and monitoring the covenants defined in	
investors	loan agreements.	
	As INV is a closed-end investment corporation, unitholders are not entitled to	
	request the redemption of their investment.	
Article 23(1) (i)		
Description of all fees,	Compensation: INV's articles of incorporation provide that it may pay its	
charges and expenses	executive director up to JPY 800,000 per month and its supervisory director	
and a maximum	up to JPY 400,000 per month. The board of directors is responsible for	
amount which is	determining the amounts of the monthly remuneration for the executive	
directly / indirectly	director and the supervisory director.	
borne by the investors		
	Asset Manager:	
	Asset Management Fee: INV pays to the AIFM an asset management	
	fee as follows:	
	(1) From January 2025 through December 2025, as a fee for every half	
	accounting period (three months), an amount not exceeding the lower of	
	either (A) the amount calculated by multiplying the total amount of the	
	relevant assets recorded as of the end of the relevant half accounting	
	period by 0.4%, and then dividing by 4 (disregarding any amounts less	
	than JPY 1) or (B) JPY 275,000,000.	
	(2) From January 2026, as a monthly fee, the higher of either (A) the	
	amount calculated by multiplying the total amount of the relevant assets	
	recorded as of the end of each relevant month by 0.4%, and then	
	dividing by 12 (disregarding any amounts less than JPY 1) or (B) JPY	
	25,000,000.	
	Acquisition Fee:	

If INV acquires any real estate or real estate-backed securities, which are targeted for asset investment, INV pays an amount not exceeding 0.5% of the amount contributed by INV among the purchase price thereof (excluding an amount equivalent to the consumption tax thereon relevant to the building) within three months from the end of the month in which the date of acquisition of such assets falls.

#### Disposition Fee

If INV disposes of any specified assets defined in INV's Articles of Incorporation, Article 11, Paragraph 1 (meaning the real estate, etc. and the real estate-backed securities), or any specified assets defined in Paragraphs 2 or any assets defined in Paragraph 3 of the same Article invested accompanying or in conjunction with the specified assets defined in Article 11, Paragraph 1, which are targeted for asset investment (including but not limited to when any assets underlying these assets are disposed of), INV pays an amount not exceeding 0.5% of the disposition price thereof (excluding an amount equivalent to the consumption tax thereon relevant to the building. For the avoidance of doubt, in the event that the assets underlying these assets are disposed of, the disposition price means the principal amount of the investment and the profits, etc. thereof (meaning dividends and other distributions other than the principal amount of the investment, which does not include any amounts reasonably calculated to have been collected by INV irrespective of whether or not such disposition of assets is made) collected by INV (hereinafter referred to as the "amount received by INV")). This amount shall be paid within three months after the end of the month in which the date of disposition of such assets falls (provided, however, that in the event that the assets underlying these assets are disposed of, within three months after the end of the month in which the date when the amount received by INV is received by INV falls). For the avoidance of doubt, if INV does not gain any profit from the subject disposition, no disposition fee shall be generated therefrom.

#### Merger Fee:

If INV is merged with another investment corporation (including by way of either incorporation-type mergers (*shinsetsu-gappei*) or absorption-type mergers (*kyushu-gappei*) in which INV becomes either the surviving corporation or the absorbed corporation after the merger), where the

Asset Manager conducts services in respect of such merger such as investigating and evaluating the assets held by such other investment corporation and other matters and thereafter the merger becomes effective, INV shall pay an amount not exceeding 0.5% of the appraised value (at the time of the merger) of the real estate, etc. and the real estate-backed securities held by such other investment corporation at the time of the merger (disregarding any amounts less than JPY 1). This amount shall be paid within three months after the effective date of such merger.

### Administrative Agency Fee:

INV pays the AIFM a fee of JPY 100,000 for each month, payable on a quarterly basis for services performed during the three-month periods ending March 31, June 30, September 30, and December 31, respectively, and payable within two months of the end of the relevant period. If INV holds a general meeting of unitholders, INV pays the AIFM an additional fee of JPY 500,000 for services performed in connection with each such meeting, payable within the three-month period immediately following the end of the month in which such meeting is held.

### Custodian:

### Custodian Fee:

INV pays to the Asset Custodian a custodian fee for each fiscal period, which may not exceed, on an annual basis, 0.02% of the total amount of its assets.

# Unitholders' Register Administrative Agent:

# • Standard Fees:

INV pays standard fees for services such as storage and administration of INV's unitholder's register, monthly reports or other reports that form part of the regular services, and the determination of the identity of INV's unitholders as of end-of-period, mid-period, and quarterly dates (excluding extraordinary determinations) and compilation of various statistical data. Monthly standard fees are equal to one-sixth of the sum of the total amount of fees calculated in the manner below, provided that the minimum monthly fee is set at JPY 200,000.

Number of unitholders	Fees per Unitholder
The first 5,000 unitholders	JPY 480
Over 5,000 and not more than 10,000	JPY 420
Over 10,000 and not more than 30,000	JPY 360
Over 30,000 and not more than 50,000	JPY 300
Over 50,000 and not more than 100,000	JPY 260
Over 100,000 unitholders	JPY 225

INV also pays a JPY 70 fee per case for data entry regarding deregistration from the unitholder's register.

#### Administration of Distributions Fees:

INV pays fees for the calculation of distributions and services such as the creation of distribution records and receipts, processing of stamp tax payment, preparation of payment records, determination of unpaid distributions and preparation of unpaid distributions records, preparation of wire transfer notices, wire transfer tape and wire transfer slips for distributions, application of withholding tax rates other than general tax rates, and preparation of distribution statements of accounts. The fees are determined based on the total number of unitholders as of the record date and calculated according to the table below, provided that the minimum fee is set at JPY 350,000.

Number of unitholders	Fees per unitholder
	receiving
	distributions
The first 5,000 unitholders	JPY 120
Over 5,000 and not more than 10,000	JPY 110
Over 10,000 and not more than 30,000	JPY 100
Over 30,000 and not more than 50,000	JPY 80
Over 50,000 and not more than 100,000	JPY 60
Over 100,000 unitholders	JPY 50

INV pays an additional charge of JPY 150 per instance in connection with distribution wire transfer instructions; a charge of JPY 100 per instance in connection with postal dividends receipts; a charge of JPY 150 per instance in connection with the application of special tax rates; and a charge of JPY 15 per instance for preparation of distribution account statements.

Special Accounts Administrator:

• Special Account Administration Fees (SMTB): These fees are for the administration of special accounts, transfer agent and handling reports, verification of securities storage and transfer mechanism and total unit numbers, and creation of reports on transaction totals. The fees are based on the total number of subscribers as of the end of the relevant month and are calculated according to the table below. There is a minimum special account administration fee of JPY 20,000 per month.

Number of subscribers	Fees per subscriber
The first 5,000 subscribers	JPY 150
Over 5,000 and up to 10,000	JPY 130
Over 10,000 subscribers	JPY 110

### Special Account Administration Fees (MUTB):

These fees are for the creation and administration of the transfer account register and the account ledger attached thereto; for reports for the notification of general unitholders; new listing, registration, cancellation, and total cancellation procedures; individual unitholder requests for information; listing and registration in the transfer account register, listing and registration of pledges, and listing and registration of trustees and assets held in trust; the opening and closing of special accounts; registration of seals for subscriber information and notifications, renewal of registration, and notifications to the subscriber information mechanism; services related to requests for the opening of special accounts for purchasers under the New Act on the Transfer of Corporate Bonds, etc.; and services relating to unit splits and reverse unit splits. The fees are based on the total number of unitholders as of the end of the relevant month and calculated according to the table below. There is a minimum fee of JPY 20,000 per month.

Number of unitholders	Fees per unitholder
The first 3,000 unitholder	JPY 150
Over 3,000 and up to 10,000	JPY 125
Over 10,000 and up to 30,000	JPY 100
Over 30,000 unitholders	JPY 75

INV also pays special account administration fees for the administration of each special account (except for certain unitholders as separately

defined) as follows: a fee of JPY 150 for a general unitholder report; a fee of JPY 250 for offer or receipt of an individual unitholder notification; a fee of JPY 250 for receipt of information requests; a fee of JPY 250 for receipt of various notices; a fee of JPY 130 for services related to distribution wire transfers; and a fee of JPY 250 for services related to documents delivery.

# Accounting Administrator:

Accounting Administration Fee:

INV pays an accounting administration fee, payable by the end of the month immediately following the month in which it receives an invoice from the Accounting Administrator. The accounting administration fee for any month is established by written agreement between INV and the Accounting Administrator, subject to a cap calculated as follows: total assets shown on INV's trial balance as of the end of the immediately prior month, multiplied by 0.0045% and divided by 12 (subject to a minimum fee of JPY 500,000).

The accounting administration fee in respect of any period less than a month is calculated on a daily pro rata basis for such period.

### Auditor:

Auditor Fee:

Remuneration for the independent auditor shall be determined by the board of directors within the maximum amount of JPY 25,000,000 per fiscal period subject to audit.

General Administrative Agent (Corporation Bonds):

• General Administrative Agent (Corporation Bonds) Fee: For principal and interest payment services with respect to series two, five, six, seven, eight, nine, ten and twelve corporation bonds, the General Administrative Agent (Corporation Bonds) receives a General Administrative Agent Fee (Corporation Bonds) equivalent to 0.00075% of any principal and interest payment amount. For principal and interest payment services with respect to series eleven corporation bonds, the General Administrative Agent (Corporation Bonds) receives a General Administrative Agent Fee (Corporation Bonds) equivalent to 0.011% of

any principal and interest payment amount. INV may also incur other miscellaneous fees in connection with the payment of distributions; certain notices, investigations and certificates; mailing of notices; handling of returned mail; preparation for general unitholders' meetings; preparation of table of unitholders; preparation of CD-ROM; printing; solicitation of wire transfer distributions; creation and processing of certain data; processing of individual or corporate number-related data; and receipt of transfer requests. Article 23(1) (j) Description of the Under Article 77 paragraph 4 of the ITA, which applies the requirements of AIFM's procedure to Article 109 paragraph 1 of the Companies Act to investment corporations, ensure fair treatment investment corporations are required to treat unitholders equally depending on of investors and the number and content of units held. In addition, upon liquidation, the details of any allotment of residual assets to unitholders is required to be made equally preferential treatment depending on the number units held under Article 77 paragraph 2 item 2 and received by investors, Article 158 of the ITA. including detailing the type of investors and their legal or economic links with the AIF or AIFM Article 23(1) (k) The latest annual Additional information may be found in INV's most recent semi-annual report report referred to in prepared in accordance with Article 22 of the AIFMD, which is available at the Article 22(1) Asset Manager's office located at Roppongi Hills Mori Tower, 6-10-1 Roppongi, Minato-ku, Tokyo. Article 23(1) (I) The procedure and INV is authorized under the articles of incorporation to issue up to 20,000,000 conditions for the units. The units of INV's predecessor, TGR Investment, Inc., were listed on issue and sale of the Osaka Stock Exchange on May 17, 2004. On February 1, 2010, TGR units Investment, Inc. merged with LCP and changed the corporate name to Invincible Investment Corporation. The units of INV have been listed on the Tokyo Stock Exchange since August 1, 2006. Secondary market sales and transfers of units will be conducted in accordance with the rules of the Tokyo Stock Exchange. Unit prices on the Tokyo Stock Exchange are determined on

	a real-time basis by the equilibrium between bids and offers. The Tokyo Stock			
	Exchange sets daily price limits, which limit the maximum range of fluctuation			
	within a single trading day. Daily price limits are set according to the previous			
	day's closing price or special quote.			
Article 23(1) (m)				
Latest net asset value	INV's unit's latest market price is publicly available at the Tokyo Stock			
of the AIF or latest	Exchange or from financial information venders (including Reuters), which can			
market price of the	be viewed at			
unit or share of the	https://www.reuters.com/markets/companies/8963.T/			
AIF				
Article 23(1) (n)				
Details of the historical	The units of INV were listed on the Tokyo Stock Exchange on August 1, 2006.			e on August 1, 2006.
performance of the	The performance of t	he units for the m	ost recent five fisca	al periods is as
AIF, where available	follows.			
	Fiscal period	Total Assets	Total Net	Net Assets per
		(JPY million)	Assets (JPY	unit (base value)
			million)	(JPY)
	40th fiscal period	496,819	254,024	41,665
	(from January 1,			
	2023 to June 30,			
	2023)			
	41st fiscal period	563,393	290,305	43,090
	(from July 1, 2023			
	to December 31,			
	2023)			
	42nd fiscal period	569,016	292,766	43,455
	(from January 1,	,	,	
	2024 to June 30,			
	2024)			
	43rd fiscal period	680,004	351,388	45,954
	(from July 1, 2024		,	
	to December 31,			
	2024)			
	44th fiscal period	675,146	351,363	45,951
	(from January 1,	070,140	001,000	70,001
	2025 to June 30,			

	2025)
Article 23(1) (o)	
Identity of the prime	No applicable prime broker.
broker, any material	
arrangements of the	
AIF with its prime	
brokers, how conflicts	
of interest are	
managed with the	
prime broker and the	
provision in the	
contract with the	
depositary on the	
possibility of transfer	
and reuse of AIF	
assets, and	
information about any	
transfer of liability to	
the prime broker that	
may exist	
Article 23(1) (p)	
Description of how	The AIFM will disclose the matters described in Articles 23(4) and 23(5)
and when periodic	periodically through the AIF Internet website and other public disclosures.
disclosures will be	
made in relation to	
leverage, liquidity and	
risk profile of the	
assets, pursuant to	
Articles 23(4) and	
23(5)	
Article 23(2)	
The AIFM shall inform	Not applicable.
the investors before	
they invest in the AIF	
of any arrangement	

made by the	
_	
depositary to	
contractually	
discharge itself of	
liability in accordance	
with Article 21(13)	
The AIFM shall also	Not applicable.
inform investors of any	
changes with respect	
to depositary liability	
without delay	
Article 23(4)(a)	
Percentage of the	There are no assets that are subject to special arrangements arising from
AIF's assets which are	their illiquid nature.
subject to special	
arrangements arising	
from their illiquid	
nature. The	
percentage shall be	
calculated as the net	
value of those assets	
subject to special	
arrangements divided	
by the net asset value	
of the AIF concerned	
Overview of any	There are no such special arrangements.
special arrangements,	
including whether they	
relate to side pockets,	
gates or other	
arrangements	
Valuation	There are no such special arrangements.
methodology applied	
to assets which are	
subject to such	
arrangements	
methodology applied to assets which are subject to such	

How management and	There are no such special arrangements.
performance fees	
apply to such assets	
Article 23(4)(b)	
Any new	Any new arrangements or change in applicable arrangements will be
arrangements for	disclosed at an appropriate time.
managing the liquidity	
of the AIF	
For each AIF that the	Any new arrangements or change in applicable arrangements will be
AIFM manages that is	disclosed at an appropriate time.
not an unleveraged	
closed-end AIF, notify	
to investors whenever	
they make changes to	
its liquidity	
management systems	
(which enable an	
AIFM to monitor the	
liquidity risk of the AIF	
and to ensure the	
liquidity profile of the	
investments of the AIF	
complies with its	
underlying obligations)	
that are material in	
accordance with	
Article 106(1) of	
Regulation (EU) No	
231/2013	
(i.e., there is a	
substantial likelihood	
that a reasonable	
investor, becoming	
aware of such	
information, would	
reconsider its	

investment in the AIF,	
including because	
such information could	
impact an investor's	
ability to	
exercise its rights in	
relation to its	
investment, or	
otherwise prejudice	
the interests of one or	
more investors in the	
AIF).	
Immediately notify	Any new arrangements or change in applicable arrangements will be
investors where they	disclosed at an appropriate time.
activate gates, side	
pockets or similar	
special arrangements	
or where they decide	
to suspend	
redemptions	
Overview of changes	Any new arrangements or change in applicable arrangements will be
to liquidity	disclosed at an appropriate time.
arrangements, even if	
not special	
arrangements	
Terms of redemption	INV is a closed-end investment corporation, and unitholders are not entitled to
and circumstances	request the redemption of their investment.
where management	
discretion applies,	
where relevant	
Also any voting or	There are no voting or other restrictions on the rights attaching to units.
other restrictions	
exercisable, the length	
of any lock-up or any	
provision concerning	
'first in line' or 'pro-	

rating' on gates and suspensions shall be included		
Article 23(4)(c)		
The current risk profile of the AIF and the risk management systems employed by the AIFM to manage those risks	The appropriateness and effectiveness of the risk management structure are regularly evaluated and enhanced by the AIFM.  Funds from debts are mainly used for asset acquisition or debt repayment.  These are exposed to liquidity risk at the time of repayment. However, the liquidity risk is controlled through such measures as striving to maintain and strengthen the capacity to procure funds from the capital market via capital raising, along with securing several fund procurement sources and diversifying repayment deadlines, and also preparing monthly plans for funds. Debt with a floating interest rate is exposed to interest rate fluctuation risks, but the impact that interest rate rises have on the operations is limited by keeping the LTV at low levels. INV takes measures to control interest rate fluctuation risks, including derivative transactions (interest rate swap transactions) to mitigate the risks of rises in floating interest rates.  Tenant leasehold and security deposits are deposits from tenants and are exposed to liquidity risks arising from tenants moving out of properties, but the liquidity risk is controlled through such measures as preparing monthly plans	
Measures to assess the sensitivity of the AIF's portfolio to the most relevant risks to which the AIF is or could be exposed	for funds.  No such measures have been implemented.	
If risk limits set by the AIFM have been or are likely to be exceeded and where these risk limits have been exceeded a description of the circumstances and the remedial measures	No such situation has occurred.	

taken		
Article 23(5)(a)		
Any changes to the	Any new arrangements or change in applicable arrangements will be	
maximum amount of	disclosed at an appropriate time.	
leverage which the		
AIFM may employ on		
behalf of the AIF,		
calculated in		
accordance with the		
gross and commitment		
methods. This shall		
include the original		
and revised maximum		
level of leverage		
calculated in		
accordance with		
Articles 7 and 8 of		
Regulation (EU) No		
231/2013, whereby		
the level of leverage		
shall be calculated as		
the relevant exposure		
divided by the net		
asset value of the AIF.		
Any right of the reuse	No such right or guarantee exists.	
of collateral or any		
guarantee granted		
under the leveraging		
agreement, including		
the nature of the rights		
granted for the reuse		
of collateral and the		
nature of the		
guarantees granted		
Details of any change	Any new arrangements or change in applicable arrangements will be	
in service providers	disclosed at an appropriate time.	

relating to the above.	
Article 23(5)(b)	
Information on the	The aggregate amount of debt with interest is JPY 348,654 million as of October
total amount of	31, 2025
leverage employed by	
the AIF calculated in	
accordance with the	
gross and commitment	
methods	

# PROMOTION OF ENVIRONMENTAL AND/OR SOCIAL CHARACTERISTICS SFDR PRE-CONTRACTUAL DISCLOSURE

Product Name/Legal Identifier: Invincible Investment Corporation / 353800JY6M2692VAV685

Invincible Investment Corporation (hereafter referred to as "INV") promotes environmental and social characteristics, but does not have as its objective a sustainable investment within the meaning of article 9(1) of Regulation (EU) 2019/2088 ("SFDR"). We have no employees in accordance with the prohibition on having employees under the Act on Investment Trusts and Investment Corporations of Japan, and relies on Consonant Investment Management Co., Ltd. ("Asset Manager"), to manage and operate the properties in our portfolio. INV and Consonant Investment Management Co., Ltd. are hereinafter referred to collectively as "we," "us" or "our." References to "fiscal year" or "FY" are to the 12 months began or beginning April 1 of the year, unless noted otherwise. We have no reference benchmark designated for the purposes of attaining the environmental or social characteristics promoted by our investment units.

Does this financial product have a sustainable investment objective?					
	□ Yes		⊠ No		
	☐ It will make a minimum of sustainable investments with an environmental objective:%		It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of% of sustainable investments		
	☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy		with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy		
	☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy		with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy		
			□ with a social objective		
	It will make a minimum of sustainable investments with a social objective:%	×	It promotes E/S characteristics, but will not make any sustainable investments		

# What environmental and/or social ("E/S") characteristics are promoted by INV?

We recognize the importance of environmental, social, and governance ("ESG") considerations in real estate investment management. With respect to this, we consider economic and social development, contribution to global environmental conservation and achieving sustainability goals as an important part of our management strategy. We have established the policies that promote sustainability based on our belief that the incorporation of ESG considerations into the real estate investment management business, which is our primary business, is essential for maximizing unitholder value over the medium to long term.

INV does not have a specific index designated as a reference benchmark to determine whether INV is aligned with the environmental or social characteristics that it promotes.

We have implemented various environmental initiatives including the following:

• Promotion of energy conservation and reduction of greenhouse gas. We promote energy saving efforts and the reduction of greenhouse gas emissions in managing our investment

assets. Out of our 146 total properties, as of June 30, 2025, we have implemented the following initiatives: Introduction of automatic meter readings (for three properties), adoption of Building and Energy Management System ("BEMS", which efficiently manages air conditioning systems and lighting) (for one property), installation of LED lightning (for 142 properties), installation of on-site renewable energy in the form of solar power (for one properties), installation of high-efficiency air-conditioning equipment and appliances (for 75 properties), installation of gas generation systems (which utilize otherwise wasted heat to reduce greenhouse gas emissions as compared to the previous power generation systems) (for 10 properties) and installation of other kinds of energy-efficient equipment such as inverters (which help make electrical facilities operate more efficiently) (for 69 properties). We have established the following targets with respect to energy saving efforts and the reduction of greenhouse gas emissions:

- Target to reduce energy consumption: Reduce energy intensity of our assets we manage as owner by 5% during the period from fiscal 2024 to fiscal 2029; and
- Target to reduce greenhouse gas: Reduce emission intensity (scope 1 and scope 2) of our entire portfolio by 5% during the period from fiscal 2024 to fiscal 2029.
- Reducing water use. As of June 30, 2025, we have implemented the following water saving measures in our properties: installation of water-saving type toilets (for six properties) and water-saving showers (for 85 properties), implementation of wastewater treatment (for one property) and reuse of rainwater, reclaimed water, and drainage (for four properties).
- Effective utilization of resources and reduction of waste. Iconia Hospitality K.K., the main operator of INV's domestic hotel portfolio, has established a matching system that reuses furniture, fixtures, equipment, tableware, and artwork that are no longer needed at other properties, in order to realize cost reduction and waste reduction.

  \* MyStays Hotel Management Co., Ltd. changed its name to Iconia Hospitality K.K. as of July 1, 2025.
- Education of our hotel assets' operators. We provide our hotel assets' operators with documentation regarding sustainable hotel operations. We conduct such education efforts and cooperate with them in order to decrease the burden on the environment caused by hotel operations and improve hotel users' consciousness about environmental issues.
- Including "Green Lease" provisions in our agreements. We have introduced environmental provisions, which we refer to as "Green Lease" provisions, in our leases with our tenants, under which tenants are required to collaborate on environmentally conscious measures and share various environment-related data with us. As of June 30, 2025, Green Lease provisions have been introduced in 73.0% of our portfolio based on gross floor area.

We have implemented various social initiatives at our properties, including the following:

- Collaboration with tenants, supply chains and local communities. We expanded the "Matching Project" which had been implemented among group hotels to promote the reuse of products, to the general public and organized an event at Art Hotel Osaka Bay Tower to sell items such as tableware, furniture and home appliances that were no longer used in the establishments due to renovation or renewal. 635 visitors participated in the event and approximately JPY 1 million in sales were donated to "Plan International", an international NGO.
- Contribution to disaster prevention. As of June 30, 2025, six of our properties are designated as "Tsunami Evacuation Buildings", which are buildings designated by municipalities in advance as an emergency evacuation site to which local residents can be evacuated temporarily when a Tsunami inundates an area.

- Providing support for employees. Employees of the Asset Manager are provided with elearning content to prepare for qualification exams and to acquire various business skills. Employees can use such content at any time to improve their expertise and skills. The Asset Manager also conducts sustainability-focused training for all its officers and employees, including temporary staff, at least once a year. The purpose of this training is to help the officers and employees acquire knowledge and raise awareness of sustainability considerations in line with business practices, such as market trends and regulations related to ESG investment and environmentally friendly real estate.
- Benefit programs for the health and well-being of each employee. The Asset Manager has
  established various benefit programs, listed below, to support the work and lifestyles of our
  employees.
  - ✓ Full subsidy for a comprehensive medical checkup (no age restriction)
  - ✓ Sick leave and consecutive leave that can be taken separately from annual paid leave
  - ✓ Family care leave (including shortened work hours for childcare or nursing care)
  - ✓ Family care leave to care for children, etc.
  - ✓ Monetary gifts for congratulations, condolences, etc.
  - ✓ Service provided by an employee benefits services company
  - Flexible working hours and remote working system
- Respect for human rights and promotion of diversity. The Asset Manager acknowledges and accepts differences in each employee's ability and values and pays respect to heterogeneity in order to maximize the abilities of each employee. We aspire to achieve sustainable corporate growth creating additional value. Our compliance regulations clearly prohibit each kind of discrimination and sexual harassment, and we strive to foster a corporate culture that respects each personality. We also promote the active participation of women by a creating work environment and systems that are comfortable for women.
- Whistleblowing system. The Asset Manager has established whistleblower protection rules that allow its officers and employees (including temporary employees) to report or consult about potential harassment, fraud or other inappropriate acts. In accordance with the Whistleblower Protection Act of Japan, the rules protect whistleblowers by prohibiting inappropriate treatment upon whistleblowing, allowing anonymous reports and keeping whistleblowers' reports confidential, and stipulate procedures to find and correct reported acts, including investigation and disciplinary actions for those who are found to have engaged in inappropriate behavior. In addition to using an in-house contact system, a whistleblower may consult an outside attorney who has no business relationship with the Asset Manager.
- Regular performance appraisals and feedback processes. All of the Asset Manager's employees set an annual performance goal following an interview with their supervisor at the beginning of each fiscal period. We conduct personnel evaluations at the end of each fiscal period after an interview with all employees to look back on their performance and provide feedback on the evaluation results. Such results are reflected in each employee's compensation. We also have established a transparent personnel evaluation system through regular measurement and feedback processes.
- Promotion of local consumption of locally produced foods. Two of our properties, Hotel Epinard Nasu and Hotel MyStays Gotanda Station, have restaurants that offer dishes using plentiful local foods. We support local agriculture and promote education regarding food.

What sustainability indicators are used to measure the attainment of each of the E/S characteristics promoted by INV?

We use the following indicators to measure the attainment of the E/S characteristics we promote.

- GRESB Real Estate Assessment. The GRESB is an annual benchmarking assessment to measure ESG integration of real estate companies and funds. It was founded in 2009 by a group of major European pension funds who played leading roles in launching Principles for Responsible Investment ("PRI"). The GRESB Real Estate Assessment is characterized by evaluating sustainability initiatives of real estate companies, REITs, and real estate funds, rather than targeting individual real estate. In the 2025 GRESB Real Estate Assessment, INV received the "3-Star" GRESB Rating, which is based on overall GRESB scores and its quintile position among participants, for the third consecutive year. INV was also awarded the "Green Star" designation for the fifth consecutive year by achieving high performance in both the "Management Component" that evaluates policies and organizational structure for ESG promotion, and the "Performance Component" that assesses environmental performance and tenant engagement of properties owned. Furthermore, INV was highly evaluated for its ESG information disclosure efforts and received, for the fourth consecutive year, the "A Level", which is the highest level for GRESB Public Disclosure assessing the substantiality of ESG information disclosure.
- Environmental targets. The Asset Manager has formulated an "Energy Conservation Policy", "Greenhouse Gas Emissions Reduction Policy", "Water Saving Policy" and "Waste Management Policy", which stipulate initiatives to reduce environmental impact caused by real estate investment management operations. Through the cycle of planning, implementation, performance management, and improvement set forth in an "Environmental Management System Operation Manual" that stipulates the details for operating these policies, the Asset Manager strives to continuously reduce the environmental impact. The Asset Manager has specific targets as stated above under "Promotion of energy conservation and reduction of greenhouse gas."
- Tenant Satisfaction Survey. The Asset Manager conducted a satisfaction survey for all residents of our residential properties (excluding three residences for students with fixed-rent subleases) through an external research organization. We continuously collect opinions and requests of residents and share them with property management companies to improve building/equipment specifications and services.
- Building-housing Energy-efficiency Labeling System ("BELS") Certification The BELS system was created for the purpose of implementing accurate evaluation and labeling of nonresidential buildings' energy-efficiency performance by third-party organizations based on the evaluation guidelines for energy-efficiency labeling for non-residential buildings issued by the Ministry of Land, Infrastructure, Transport and Tourism of Japan in October 2013. As of June 30, 2025, we had received five stars for six properties, four stars for five properties, three stars for three properties and two stars for five properties. The BELS system was revised in April 2024 and the rating system for non-residential buildings was changed from a five-star ranking to a six-star ranking to reflect higher levels of energy efficiency than the previous maximum rating.
- Comprehensive Assessment System for Built Environment Efficiency ("CASBEE") CASBEE is a method that comprehensively assesses the quality of a building, and evaluates features such as interior comfort and scenic aesthetics, in consideration of environment practices including use of materials and equipment that save energy or achieve smaller environmental loads. As of June 30, 2025, we had acquired CASBEE Certification for Buildings (Existing Buildings) for five hotel properties with the certification rank of Rank A, Rank B+ and Rank B-, out of a scale with the following five ranks: Rank S (the highest rank), Rank A, Rank B+, Rank B-, and Rank C. In addition, we had acquired Certification for CASBEE for Real Estate for three residential properties and three hotel properties with the certification rank of Rank A and Rank B+, out of a scale with the following four ranks: Rank S (the highest rank), Rank A, Rank B+, and Rank B-.
- DBJ Green Building Certification. DBJ Green Building Certification is an environmental and social rating system created and administered by the Development Bank of Japan to measure

the environmental and social awareness characteristics of real estate properties. The DBJ Green Building Certification assesses the characteristics of a green building from perspectives such as ecology, risk management and amenity and community & partnership. As of June 30, 2025, we acquired certifications for six hotel properties with certification ranks of four stars and three stars, out of a five-star ranking system: five stars (the highest rank), four stars, three stars, two stars and one star.

- Green Key. Green Key certificate is a prestigious international eco-label given to environmentally friendly accommodation and leisure facilities and is a certification system established by the Foundation for International Environmental Education, headquartered in Denmark. As of June 30, 2025, we acquired a certification for one hotel property (this hotel property is the underlying asset of the preferred equity interests that INV holds). Green Key certificate has no ranking levels.
- Sakura Quality An ESG Practice. Sakura Quality An ESG Practice is an ESG certification for accommodation facilities developed in Japan, aimed at maintaining and enhancing initiatives supporting SDGs in areas such as community engagement, cultural preservation, and environmental practices within the hospitality industry. It is an international certification system approved by the Global Sustainable Tourism Council. As of June 30, 2025, we acquired certifications for two hotel properties with a three-star rating out of a five-star ranking system: five stars (highest rank), four stars, three stars, two stars and one star.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

Not applicable.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Not applicable.

# **Principal Adverse Impacts**

# Does INV consider principal adverse impacts on sustainability factors?

Yes, INV considers principal adverse impacts on sustainability factors. INV collects on an ongoing basis select information on our existing portfolio regarding the principal adverse impact indicators, including exposure to fossil fuels through investment assets, exposure to energy-inefficient investment assets and GHG emission intensity. We aim to manage the risk connected to principal adverse impacts from our investment decisions in several ways, including general screening criteria and due diligence.

- Exposure to fossil fuels through assets. We do not invest in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels.
- Exposure to energy-inefficient investment assets. We consider properties that have not received any of the green building certifications to be energy-inefficient. As described in more detail above, we implement appropriate measures to reduce the environmental impact of these properties and believe such engagement results in obtaining environmental certifications.
- GHG emission intensity. Total GHG emissions generated by INV's portfolio were 24,546 t-CO2 in FY2020, 25,722 t-CO2 in FY2021, 26,477 t-CO2 in FY2022, 26,553 t-CO2 in FY2023 and 26,595 t-CO2 in FY2024. We aim to reduce GHG emissions intensity (aggregate amount of Scope 1 and 2) of our portfolio by 5% over five years compared to the FY2024 levels. Furthermore, we aim to reduce GHG emissions intensity (Scope 3 and

aggregate amount of Scope 1, 2 and 3) of our portfolio by 1% over five years compared to the FY2024 levels.

• Respect for human rights. The Asset Manager respects human rights and diversity, and does not tolerate human rights infringement such as forced labor, child labor, discrimination and harassment in its business activities pursuant to our compliance rules. We also promote the active participation of women by creating work environment and systems that are comfortable for women and create a corporate culture that respects each personality.

We believe that investment decisions that negatively affect climate or other environmental elements, or have negative implications for society, can have a significant impact to risk and value creation for our unitholders. To this end, we consider the principal adverse impacts of our investment decisions on the above sustainability factors throughout all major steps of the investment decision and management process throughout the lifecycle of the properties in our portfolio.

More information related to principal impacts on sustainability factors can be found on the website: <a href="https://www.invincible-inv.co.jp/en/strategy/sustainability.html">https://www.invincible-inv.co.jp/en/strategy/sustainability.html</a>

### **Investment Strategy**

# What investment strategy does INV follow?

- Investment policy. INV, which makes focused investments in hotels and residential properties as core assets, manages its assets with an aim to secure stable growth and profits over the medium and long term. INV also recognizes its social responsibility to the environment and local communities as a J-REIT and therefore proactively implements ESG-friendly investment management and sustainability initiatives that take advantage of our assets' characteristics, such as providing our properties for social contribution activities such as voluntary cleanup on roads and rivers.
- Due diligence. Prior to our investment in a property, to identify risks and avoid investments in properties that have overly high levels of risk, the Asset Manager conducts a due diligence review of the property, including investigation of soil contamination and toxic substances such as asbestos, Freon gas and polychlorinated biphenyls ("PCB") by obtaining real estate appraisal reports and engineering reports, from real estate appraisers and real estate investigators, in addition to conducting economical, physical and legal assessment. For overseas property, INV complies with laws and regulations regarding the environment and geology in the country or region where properties are located and makes a comprehensive judgment on whether or not to invest, taking into account real estate market trends based on political and economic conditions, the practices in the region and various risks in various fields such as legal affairs, accounting, taxation, foreign exchange, and socio-economic conditions.
- Sustainability Committee. The Asset Manager has established the Sustainability Committee, which generally meets at least four times a year. The Sustainability Committee uses the data of environmental performance to assess progress made against sustainable targets, and decides on necessary action plans in order to implement initiatives continuously and systematically based on our Sustainability Policy. The activity conducted by the Sustainability Committee is reported to all officers and employees of the Asset Manager and INV's board of directors.

# What are the binding elements of the investment strategy used to select the investments to attain each of the E/S characteristics promoted by INV?

When the Investment Committee and the Compliance Committee of the Asset Manager make a decision to invest in a property (subject to the approval of the board of directors of the Asset Manager), findings about the property on the sustainability considerations are incorporated into the overall investment proposal. To the extent possible, the committees generally exclude investment proposals with the following ESG issues: (i) the level of asbestos in the property, after removal or treatment, exceeds the maximum level permitted under applicable environmental law; (ii) the usage and disposal of PCB-containing machines in the property are not properly handled in accordance with relevant law; (iii) soil contamination, after treatment, exceeds the maximum level permitted under applicable environmental law. As discussed above, the Asset Manager has established the Sustainability Committee, which uses environmental performance data to assess progress made against sustainable targets with the aim of not increasing intensity levels (e.g., of energy consumption, greenhouse gas emissions and water usage and waste volume) compared to the FY 2019 levels, and decides on necessary action plans in order to implement initiatives continuously and systematically based on our Sustainability Policy.

Also, INV does not invest in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels and/or nuclear energy-related activities.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

All investments are made pursuant to our current investment strategy.

Prior to our investment in a property, the Asset Manager conducts due diligence review of the property, including the assessment of compliance with applicable environmental laws and regulations, environmental performance and disaster risks, as well as investigation into hazardous substances and soil contamination by obtaining environmental assessment from third parties. We also do not consider investing in properties that do not meet the standards for soil contamination and other environmental contamination in accordance with the related environmental laws and ordinances. However, from time to time we invest in properties not meeting the standards as long as they are deemed fixable promptly after the investment.

# What is the policy to assess good governance practices of the investee companies and INV?

INV invests directly or indirectly through trust beneficiary interests in real estate and real estate-related assets. Therefore, the assessment of good governance practices in relation to investee companies is not applicable to INV.

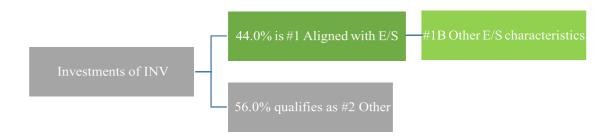
While there is no third-party rating used to assess our governance practices, we, along with the Asset Manager, have introduced the following measures to assess and enhance our governance systems:

- Related-party transactions. When INV conducts certain transactions such as asset acquisition from sponsor related parties, prior approvals by the Board of Directors of INV are required to ensure an objectivity in deliberation regarding conflicts of interests. In such agenda, only two supervisory directors (a lawyer and a certified public accountant) will participate in the vote, and the executive director who concurrently serves as the representative director of the Asset Manager will not participate in the vote as he is a related-party.
- Risk management. The Asset Manager has established a risk management manual for the purpose of ensuring stable management and performing appropriate risk management as a financial instruments business operator. In addition, the Asset Manager's Board of Directors has established a risk management policy and procedures to monitor and supervise the development of an appropriate risk management system.
- Internal audit system. The Asset Manager conducts annual internal audits at least once a year, in order to evaluate its risk management. Once the internal audit is completed, the Compliance Officer, who serves as the chief controller of internal audit, reports the audit results to the representative director of the Asset Manager, Compliance Committee and the audited departments. The Compliance Officer also reports to the Board of Directors of the Asset Manager as necessary. The Compliance Officer reports the progress made on matters for improvement indicated by internal audits. Verification of the status of improvement will be conducted subsequent to on-site audits.

#### Asset Allocation

# What is the asset allocation planned for INV?

INV's asset allocation is 100% in real estate and real estate-related assets. As of June 30, 2025, INV has a BELS certification for its 19 hotels, accounting for 21.1% of our properties based on appraisal value on the valuation date of June 30, 2025 and acquisition price of the preferred equity interest in the TMK which holds Sheraton Grande Tokyo Bay Hotel as an underlying asset. In addition, INV has CASBEE Certification for Buildings (Existing Buildings) for its five hotels and Certification for CASBEE for Real Estate for its three residential properties and three hotel properties, DBJ Green Building Certification for six hotel properties, Green Key certificate for one hotel property (which is the underlying asset of the preferred equity interests that INV holds), and Sakura Quality An ESG Practice for two hotel properties, accounting for 33.0% of our properties as of June 30, 2025 (properties with multiple certifications are only counted once for such purposes). We target to further acquire such certifications as BELS, CASBEE, DBJ Green Building Certification, Green Key certificate and Sakura Quality An ESG Practice, prioritizing hotels which represent major portions of INV's portfolio in terms of gross floor area. As a result, 44.0% of our properties is #1 aligned with E/S characteristics as of June 30, 2025.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

The sub-category #1B Other E/S characteristics covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by INV?

Not applicable.

To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

Not applicable.

Does INV invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?

Not applicable. INV does not invest in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels and/or nuclear energy-related activities.

What is the minimum share of investments in transitional and enabling activities?

Not applicable.

What is the minimum share of sustainable investments with an environmental objective that are not

aligned with the EU Taxonomy?

Not applicable.

What is the minimum share of socially sustainable investments?

Not applicable.

What investments are included under "#2 Other," what is their purpose and are there any minimum environmental or social safeguards?

We have invested in these properties in accordance with our investment strategy before we established the policies for sustainability, because these properties met our minimum investment criteria and we believed the acquisition of these properties would enhance unitholder value. We implement appropriate measures such as installation of energy-saving or water-saving equipment and waste recycling to reduce their environmental impact following acquisition, including by obtaining environmental certifications. We also investigate the presence of harmful substances, the history of past land usages and the soil when investing in properties. We do not invest in properties with respect to which appropriate measures have not been taken under the Soil Contamination Countermeasures Act of Japan and other environmental laws and ordinances.

#### **Index as Reference Benchmark**

Is a specific index designated as a reference benchmark to determine whether INV is aligned with the environmental or social characteristics that it promotes?

INV does not use a specific index designated as a reference benchmark to determine whether INV is aligned with the environmental or social characteristics that it promotes. However, our investment units have been included in the Nikkei ESG-REIT index ("Nikkei Index"), which was established in 2020, since its establishment. The Nikkei Index is an index composed of Tokyo Stock Exchange-listed J-REITs, which are included based on GRESB's evaluations on ESG indicators. Its constituents are reviewed and updated every November.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by INV?

Not applicable.

Where can the methodology used for the calculation of the designated index be found?

Not applicable.

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

We ensure the alignment of our investment strategy with the methodology of Nikkei ESG through investments in energy saving or environmentally certified buildings.

How does the designated index differ from a relevant broad market index?

See above.

**More Product-specific Information** 

Where can I find more product-specific information online?

More product-specific information can be found on the website: <a href="https://www.invincible-inv.co.jp/en/strategy/sustainability.html">https://www.invincible-inv.co.jp/en/strategy/sustainability.html</a>

# **Note Regarding the EU Taxonomy Regulation**

As set out above, we promote certain environmental characteristics.

The Asset Manager is required, under Regulation (EU) 2020/852 (the "EU Taxonomy Regulation"), to disclose whether its assets are aligned with the environmental objectives formulated in the EU Taxonomy regulation. The EU Taxonomy Regulation is to be complemented by technical standards and screening criteria. The technical screening criteria for the first two environmental objectives (climate change mitigation and climate change adaptation) were adopted in December 2021 and amended in June 2023. The amended criteria apply as of January 1, 2024. The technical screening criteria for the other four environmental objectives (sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems) were adopted in June 2023. They apply as of January 1, 2024.

We invest in economic activities that are eligible under the EU Taxonomy Regulation in respect of climate change mitigation and/or climate change adaptation. This means that screening criteria for these investments have been or will be developed. The Asset Manager expressly states that in view of the fact that the regulations are still under development or have only recently been adopted and/or amended and the fact that, as a result thereof, data on alignment of our investments with these environmental objectives and climate related goals in line with EU Taxonomy Regulation are not sufficiently available, the Asset Manager is not currently in a position to disclose on an accurate and reliable basis to what extent our investments technically qualify as Taxonomy-aligned or "environmentally sustainable" within the specific meaning of the EU Taxonomy Regulation. Our investments may have a positive contribution to these environmental objectives and may therefore eventually be considered Taxonomy-aligned, but at this stage, the Asset Manager is required to state that there is no minimum proportion of our investments that qualify as such.

The Asset Manager further states that the "do no significant harm" principle applies only to those investments underlying the financial product that takes into account the EU criteria for environmentally sustainable economic activities. The investments underlying the other portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

# INTEGRATION OF SUSTAINABILITY RISKS IN THE INVESTMENT DECISIONS, AND THE IMPACT OF SUCH RISKS ON THE RETURNS OF INV (SFDR ARTICLE 6 DISCLOSURE)

INV and the Asset Manager address sustainability risks by taking into account environmental, social and governance, or ESG, factors in our investment decision process and on a continuous basis.

The Asset Manager tracks and monitors the property-level environmental performance indicators of our properties to assess the environmental performance of our portfolio appropriately. The Asset Manager's Sustainability Committee, which generally meets at least four times a year, uses the data of environmental performance to assess progress made against sustainable targets, and decides on necessary action plans in order to implement initiatives continuously and systematically based on our Sustainability Policy. The Sustainability Committee consists of (i) the President and CEO, who is the final decision-maker, (ii) the general manager of the Asset Management Department and the general manager of the Planning Department, who are responsible for executing sustainability initiatives, and (iii) officers and employees that engage in promoting sustainability.

Under this organizational structure, we have instituted a number of initiatives, at both the portfolio

level and individual property level, to promote E/S characteristics. Such initiatives include climate change initiatives, initiatives for saving/reducing energy consumption, local community initiatives, and initiatives for employees'/tenants' initiatives.

In order to conduct sustainable asset management while maximizing the value of our properties, we have considered ESG factors in our investment and asset management processes. Our Sustainability Policy expressly states that we consider the environment and stakeholders such as tenants, supplier and local communities, and we request our hotel tenants to cooperate with our sustainability initiatives. We consider environmental and social factors when procuring products and services.

While sustainability issues will severely impact our business activities, we believe that such issues may also become potential business opportunities to create new value for sustainable growth. Accordingly, we position our commitment to sustainability as one of the top priorities in our management strategies. We also believe that integrating sustainability factors alongside traditional financial and operational metrics in our investment decision process helps us make a more holistic assessment of a property's risks and opportunities and is commensurate with the pursuit of superior risk-adjusted returns. In other words, we believe that if we fail to consider ESG factors enough in the investment decision-making process, it may cause the increase of capital cost and even reduce investors' returns. If our ESG initiatives are not sufficient, our investment units may be excluded from investment by investors who use the status of ESG initiatives as one of their investment criteria. As a result, the investment unit price may be adversely affected. We are exposed to the following risks in particular.

# Physical risks

The assets in which we invest are exposed to earthquake, flood and storm risks because some of our properties are located in areas that are sensitive to their impact. If a significant earthquake, flood or storm hits any of our properties, it will likely have a negative effect on its value. This may include physical damage to the properties and tenants' premises. In order to secure stable growth of investment assets and stable profits over the medium and long term, INV aims to construct a portfolio of geographically diverse investment assets by avoiding concentrated investment in certain areas to mitigate earthquake and other risks.

# Reputation and fund raising risks

We are exposed to the risk of funds being available only at less advantageous terms due to stricter ESG requirements on portfolio composition and other factors, as well as the risk of reputational decline if INV's measures on climate-related issues are perceived negatively by investors or the general public. We fulfill our accountability for stakeholders by actively disclosing ESG related information. We also consider the use of external evaluations and third-party certification to visualize the results of our environmental and social initiatives.