

SAY ON CLIMATE ASSESSMENT



Country



France

Year

2026

Transparency rating

Alignment with FIR
recommendations

60% ↑

PERFORMANCE SCORE

57%



NARRATIVE SCORE

A B C D E

TREND SCORE



Mercialys has set a Net Zero 2050 ambition across its entire value chain, validated by SBTi in 2025 using the 'Whole Building' approach, with **clear long-term quantified targets**. The operational levers are numerous and detailed, with a **high and rising rate of CAPEX aligned with the taxonomy**.

However, several shortcomings undermine the credibility of the trajectory. In the short and medium term, **no specific targets have been set before 2030 for certain Scope 3 categories, and no action plan is envisaged beyond 2030**. Regarding the action plan, **the Scope 3 levers lack quantification** and the **contribution of each action to the targets is not specified**. In terms of governance, **long-term remuneration does not incorporate a specific target for Scope 3**, which nevertheless accounts for around 90% of total emissions.

In summary, **a well-structured long-term ambition**, improving compared to 2022, but **short- and medium-term management that is still insufficient** to guarantee the robustness of the trajectory.

SUMMARY

- ▶ [Assessment based on the FIR's analysis framework](#)
- ▶ [Assessment according to ACT](#)
- ▶ [FIR Recommendations Grid](#)
- ▶ [ACT Assessment Methodology](#)
- ▶ [ACT assessment methodology for the generic sector](#)

As early as 2021, the **Forum for Responsible Investment (FIR)** called for the widespread adoption of rigorous Say on Climate (SOC) measures. Following an initial initiative in 2022, it co-signed [an open letter with 48 French and European signatories](#) in March 2023 and again [in 2025](#), to encourage the development of SOC. At the same time, in 2022, [the FIR began analysing the climate plans of French companies](#) that put them to a shareholder vote. Having joined forces in 2023, the **FIR and ADEME** expanded their partnership in 2024 by working with **Ethos and the World Benchmarking Alliance** to analyse the transparency and performance of companies' climate plans, based on the [ACT methodology](#). Once again this year, these organisations will work together to examine the climate plans of **European companies** submitted to a consultative shareholder vote at their general meetings in 2026.

The analyses will be published progressively in the run-up to their AGMs. As in previous years, the FIR wishes to **commend the efforts of companies that contribute to improving shareholder dialogue and encourages companies to repeat the Say on Climate exercise annually**.

SAY ON CLIMATE ASSESSMENT



Net Zero 2050 ambition

Net Zero target across the entire value chain by 2050.
An improvement on the previous trajectory aiming for Well Below 2°C announced in 2019.



Reference scenario(s) used

Net Zero 2050 target across the three scopes validated in 2025 as being aligned with 1.5°C by SBTi according to the “Whole Building Approach” methodology.

Preliminary study of three reference scenarios:

- BAU, SDA for the property sector and well below 2°C, the latter being the most advanced SBTi scenario in 2019



Current GHG emissions (2025 vs 2024)

SCOPE 1 (location-based)	SCOPE 2 (market-based)*	SCOPE 3
1,218 tCO ₂ eq (vs 1,059) 4.8%	1,401 tCO ₂ eq (vs 2,960) 5.5%	22,651 tCO ₂ eq (vs 28,539) 89.6%

▷ Significant change in the reporting of Scope 3 GHG emissions, particularly regarding emissions linked to tenants' energy consumption, between the 2025 and 2024 DEUs, with no explanation (in the 2025 DEU, 2024 Scope 3 emissions amount to 28,539 tCO₂eq, whereas in the 2024 DEU, these emissions amount to 61,532 tCO₂eq)

▷ Lack of breakdown in Scope 3 reporting, which is not categorised according to the GHG Protocol



Short-term GHG emissions reduction target (before 2030)

▷ A decarbonisation pathway but no specific targets disclosed for the period between 2025 and 2030.



Medium-term GHG emissions reduction target (between 2030 and 2040)

2030 targets (vs 2017) validated at 1.5°C by SBTi from 2025:

- To reduce emissions linked to energy consumption at its centres (Scopes 1, 2 and 3, Category 13) by 62.8% per square metre using a market-based approach;
- Reduce emissions linked to construction work and waste management (Scope 3, categories 2, 4 and 5) by 32.5% in absolute terms;

▷ The following Scope 3 categories are not included in the medium-term targets: 1, 3, 6, 7, 8, 9, 15



Long-term GHG emissions reduction target (2050 or earlier)

2050 targets (vs 2017) validated by SBTi from 2025:

- Reduce emissions linked to energy consumption in its centres (Scopes 1, 2 and 3, category 13) by 93.2% per m² using a market-based approach
- Reduce Scope 3 emissions linked to all Mercialis activities (categories 1, 2, 3, 4, 5, 6, 7, 8, 9 and 15) by 90% in absolute terms.



Action plan measures

Key levers for Scope 1 & 2:

- Energy modelling of centres (100% of assets except the Saint-Genis 2 shopping centre acquired in 2025)
- Real-time remote meter reading at 89% of sites
- Building Management System (BMS) on 99% of assets
- Energy-saving plan: temperature controls, switching off lighting, reducing ventilation, etc.
- LED retrofitting and improved insulation

Change in rating compared to the Say on Climate 2022 FIR analysis:



Key:

- All criteria for achieving full marks have been met, but suggestions for improvement regarding transparency
- ▷ Shortcomings preventing the award of full marks

Next slide



* Location-based: 3,361 tCO₂eq (vs 3,736)

SAY ON CLIMATE ASSESSMENT



→ ● Action plan measures (continued)

Key levers for Scope 1 & 2:

- Preventive maintenance of HVAC (heating, ventilation and air conditioning) systems using a CMMS (computerised maintenance management system) across 44% of assets
- 45% of Mercialys centres' energy consumption to come from renewable sources by the end of 2025
- Installation of on-site solar panels (e.g. the Costières shopping park in Nîmes, where 33% of annual consumption is met by solar panels)

Key Scope 3 levers

- Collection of retailers' consumption data as part of the DEET (Tertiary Eco-Energy Scheme)
- Advice to tenants on purchasing carbon-free electricity
- Raising staff awareness regarding business travel (video conferencing, remote working, hybrid vehicles)
- Optimisation of waste sorting and treatment processes

Carbon offsetting: considered only as a last resort; not used to date.

- The levers for decarbonising Scope 3 could be quantified and detailed even further
- ▷ The contribution of actions to reduction targets is not explicitly stated
- ▷ No information on the action plan beyond 2030

↑ ● Alignment of CAPEX and OPEX investments

The proportion of eligible and aligned CAPEX stands at 99.8% and 71.1% respectively (vs 97% and 49.7% in 2024)

The proportion of aligned CAPEX has increased by 21.4% compared to 2024

- Expected improvement in transparency regarding CAPEX requirements associated with action levers

→ ● Remuneration

Remuneration of the Chief Executive Officer

- Annual variable remuneration ratio: 22% of the variable component based on an aggregate target including the implementation of the 4 Fair Impacts CSR strategy (Environmental component of 4 Fair Impacts: "OUR AMBITIONS BY 2030": Aiming for net-zero carbon emissions, 100% of waste recycled, zero use of plant protection products)
- Long-term remuneration ratio: 30% of the total allocation based on the 3-year target for reducing carbon intensity per square metre, in line with the property company's SBTi-certified Net Zero trajectory by 2050 (in kgCO₂ eq/m² using a 'whole building approach')
- Long-term remuneration policy: 25% of the total allocation based on the 3-year target (i.e. by the end of December 2028) for reducing carbon intensity per unit area (in kgCO₂ eq/m² using a 'whole building approach') in line with the property company's SBTi-certified Net Zero trajectory by 2050.

- ▷ Significant dilution and lack of transparency regarding the weighting of the GHG reduction criterion in the annual variable remuneration report
- ▷ Removal of the criterion directly linked to GHG emissions reduction from the 2026 variable remuneration policy
- ▷ Reduction in the weighting of the criterion relating to GHG emissions reduction in the long-term remuneration policy
- ▷ No specific Scope 3 target in long-term remuneration (accounting for around 90% of total emissions)

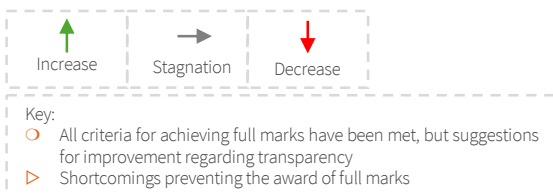
→ ● Annual advisory vote on implementation

No information.

→ ● Consultative vote every three years on strategy

No information but last SOC published in 2022.

Change in rating compared to the FIR Say on Climate 2022 analysis:



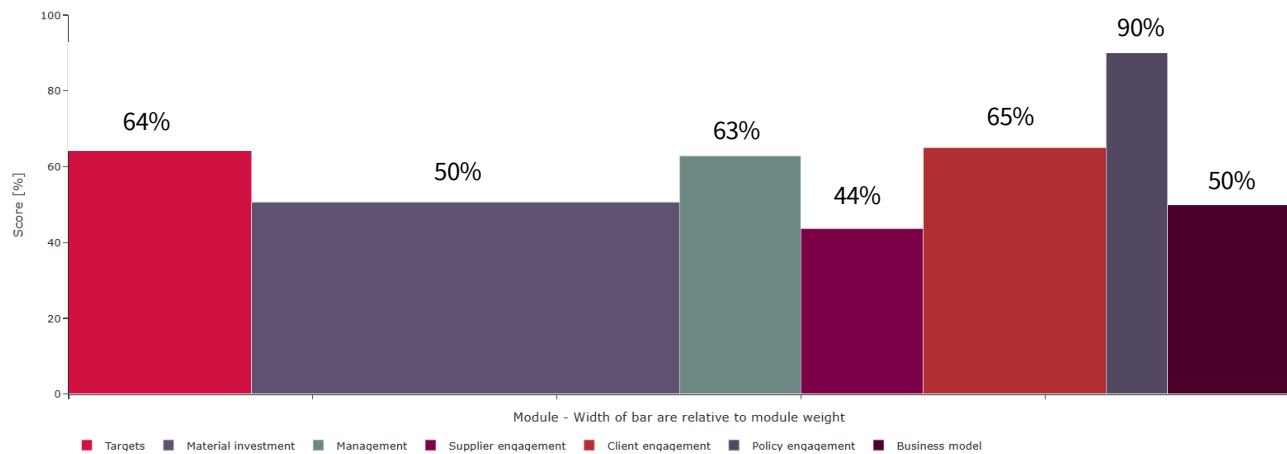


PERFORMANCE SCORE
57%

NARRATIVE SCORE
A B C D E

TREND SCORE
=

ACT Real Estate methodology



Transition plan assessment criteria

Performance score

1. Targets: Mercialis has set SBTi intensity targets aligned with a 1.5°C pathway for 2030 and 2050 (updated in 2025) for its owned and managed assets. However, the company does not appear to have defined specific targets or alignment criteria for newly acquired assets, and does not include emissions linked to the production of purchased goods and services (Scope 3 cat. 1) in its 2030 targets. Furthermore, the company could set milestones between 2030 and 2050.

2. Material investment: Scope 1 and 2 emissions are reducing significantly. However, the company only reports market-based Scope 2 emissions, i.e. those based on 'green' electricity purchase agreements. The company does not publish its locked-in emissions, nor the projected emissions from its leased buildings.

5. Management: The climate strategy is integrated into governance and addressed at the level of Mercialis' Board of Directors. Environmental KPIs are incorporated into the Chief Executive Officer's annual variable remuneration. However, the company does not mention having modelled different climate scenarios to assess the risks to its operations.

6/7. Value chain engagement: Despite a code of conduct containing environmental criteria, the integration of climate performance into supplier management remains limited, with no specific emissions reduction targets or systematic carbon criteria in procurement decisions. However, regarding customer engagement, Mercialis has developed environmental clauses ('responsible landlord-tenant pact') in its contracts and aims for 100% of tenants to be committed to these pledges by 2030. These clauses primarily focus on the sharing of customer data between the tenant and the landlord, as well as the implementation of action plans to improve the environmental performance of the property.

8. Public commitment: The company publicly supports the Paris Agreement, but could implement a process to review the positions and professional activities of which the company is a member or partner.

9. Business model: Mercialis is developing an approach aimed at promoting sustainable mobility around its shopping centres, through the deployment of facilities that encourage low-carbon modes of transport (electric vehicle charging points, bicycle parking, car-sharing spaces) and the accessibility of sites via public transport.

Climate consistency (narrative score): Mercialis has a structured transition plan, but the actions identified for its Scope 3 emissions - which account for over 90% of total emissions - remain inadequate. Furthermore, the company does not publish a long-term action plan, which makes the 'net zero' target by 2050 seem implausible. Mercialis is not the subject of any environmental controversy.

Trend score: The company appears capable of improving its performance in the coming years; however, it must implement and demonstrate action plans for its Scope 3 emissions to strengthen the credibility of its commitment.

Areas for improvement identified:

- Mercialis is expected to better outline its action plan and the **impact of the measures regarding its Scope 3 emissions**, which account for 90% of total emissions.
- Mercialis could **publish more detailed data**, particularly regarding its scope 2 location-based emissions, its CAPEX per asset, the future development of its portfolio, and the funds allocated to the transition.
- Mercialis should **set interim milestones** towards its long-term 'net zero' target, in order to strengthen the credibility of its commitment.

SAY ON CLIMATE 2026 EVALUATION GRID

Based on monitoring of FIR recommendations

Net Zero 2050 Ambition	Whether the stated ambition to contribute to carbon neutrality by 2050 is present, along with clear explanations of how this neutrality will be achieved The level of negative emissions is limited	The ambition to contribute to carbon neutrality by 2050 is stated and the explanations on how to achieve this neutrality are clear. The level of negative emissions is high or unclear.	Ambition stated but very unclear on how the company intends to achieve carbon neutrality (no long-term targets, the targets set are not credible, heavy reliance on offsetting, etc.) or no stated ambition for carbon neutrality by 2050
Reference scenarios used	The company aligns its climate strategy with a 1.5°C warming scenario across all scopes and in the medium and long term	The company uses a reference scenario limiting warming to between 2°C and 1.5°C or 1.5°C for only part of its scope or only in the medium or long term	No reference scenario is explicitly mentioned, or the scenario(s) is/are not used to define the strategy
Current GHG emissions	Disclosure of greenhouse gas emissions in absolute terms; breakdown by scope; reduction in absolute emissions over the last three years	Insufficiently detailed disclosure of greenhouse gas emissions in absolute terms, or no justification provided for the increase in absolute emissions over the last three years	Lack of public data, or if the upward trend in emissions intensity and absolute emissions is poorly justified or not justified at all
Short-term GHG emissions reduction target	Whether the quantified emission reduction targets for before 2030, expressed at a minimum in absolute terms, cover all three scopes and are set in relation to the company's 1.5°C alignment pathway. This pathway has been scientifically validated.	If the quantified emission reduction targets for before 2030 do not cover the majority of the company's activities, or if these targets cover all activities but are on a trajectory between 2°C and 1.5°C	Lack of a quantified short-term emissions reduction target or unambitious short-term targets (base year too distant, no absolute reduction, not scientifically validated, etc.)
Medium-term GHG emissions reduction target	If the quantified emission reduction targets for 2030, expressed at least in absolute terms, cover all three scopes and are aligned with a 1.5°C scenario. This trajectory has been scientifically validated	If the quantified emission reduction targets for 2030 do not cover the majority of the company's activities, or if these targets cover all activities but are on a trajectory between 2°C and 1.5°C	Absence of a quantified medium-term emissions reduction target or unambitious medium-term targets (reference year too distant, no absolute reduction, not scientifically validated, etc.)
Long-term GHG emissions reduction target	If the quantified emission reduction targets for 2050 or earlier, expressed at a minimum in absolute terms, cover all three scopes and are set in relation to the company's 1.5°C alignment trajectory. This trajectory has been scientifically validated	If the quantified emission reduction targets for 2050 or earlier do not cover the majority of the company's activities, or if these targets cover all activities but are on a trajectory between 2°C and 1.5°C	Lack of quantified long-term emission reduction targets or unambitious long-term targets (base year set too far in the past, no absolute reduction, not scientifically validated, etc.)
Measures in the action plan	Detailed measures for each scope of the company with sufficient detail, including short- and medium-term figures, enabling an assessment of the plan's alignment with the set targets	Detailed measures for each scope of the company, but the level of detail is insufficient to assess the degree of alignment with the set objectives (in particular, a lack of quantified measures)	Measures with little or no detail
Alignment of investments (OPEX / CAPEX)	Details the proportion of investments (OPEX and CAPEX) that contribute to meeting the set short- and medium-term objectives and explains how these investments enable the set objectives to be achieved	The information provided regarding the contribution of investments to meeting the set objectives does not make it possible to understand how the company achieves the set objectives	No investments contributing to the achievement of the stated objectives are specified
Remuneration	All variable components of executive directors' remuneration include at least one criterion that assesses the achievement of greenhouse gas emission reduction targets. The percentage of remuneration determined by this criterion is published; it represents a significant proportion (10% or more)	At least part of the variable component of executive directors' remuneration is subject to an undiluted criterion for reducing greenhouse gas emissions in line with the reduction trajectory defined by the company	The criterion incorporated into the remuneration of corporate officers relating to the reduction of greenhouse gas emissions is diluted, or does not follow the reduction trajectory defined by the company. Or there is no criterion linked to the reduction of greenhouse gas emissions in executive remuneration
Annual consultation on implementation	The company undertakes to consult shareholders annually on the implementation of the climate strategy	The company undertakes to consult shareholders on the implementation of the climate strategy in the coming years or is consulting for the second consecutive year or more	The company does not commit to consulting shareholders on the implementation of its climate strategy
Consultation every three years on the strategy	The company commits to consulting shareholders on its climate strategy at least every three years	The company commits to consulting shareholders on its climate strategy in the coming years or has done so for the second consecutive year or more	The company does not commit to consulting shareholders on its climate strategy

METHODOLOGY ACT

→ IT'S TIME TO ACT

WHAT IS ACT ?

A joint voluntary initiative of the UNFCCC secretariat Global Climate Agenda.

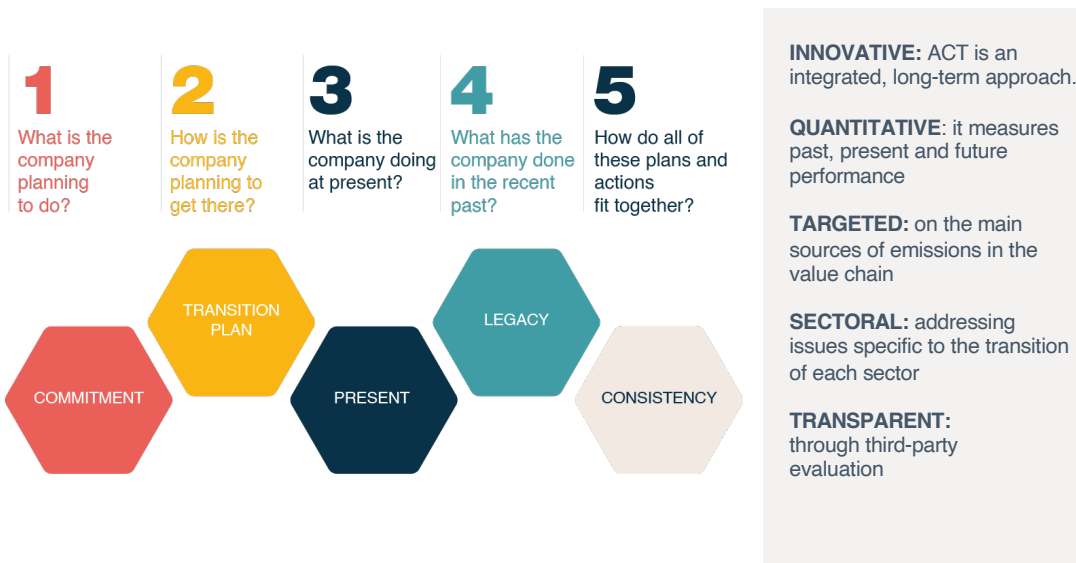
WHY ACT ?

Drive climate action by companies and align their strategies with low-carbon pathways.

HOW DOES ACT WORK ?

ACT provides sectoral methodologies as an accountability framework to assess how companies' strategies and actions contribute to the Paris mitigation goals.

FRAMEWORK



ACT ASSESSMENT

For what purpose?

Credibly measure the contribution to the net-zero objective in relation to sectoral low-carbon trajectories.

For whom?

Companies with science-based objectives and/or a transition plan ready for assessment



ACT METHODOLOGY

Real estate Sector

All the components of the ACT methodology for the Generic sector can be found on [its website](#). The detailed assessment is summarised in a rating based on three criteria: performance, overall consistency and trend. It takes the following form:

- **Performance:** a figure between 1 and 100
- **Assessment (consistency):** letter between A and E
- **Trend:** + (improvement), - (deterioration), = (stable)

Module	Indicator
1. Targets	1.1 Alignment of owned buildings reduction targets
	1.2 Alignment of buildings managed (use phase) reduction targets
	1.3 Alignment of new buildings integrated (use phase) reduction targets
	1.4 Alignment of new buildings (materials) reduction targets
	1.5 Time horizon of targets
	1.6 Historic target ambition and company performance
3. Material investment	3.1 Trend in past emissions intensity for buildings managed
	3.2 Emissions lock-in
	3.3 Trend in future emissions intensity for buildings managed
4. Management	5.1 Oversight of climate change issues
	5.2 Climate change oversight capability
	5.3 Low carbon transition plan
	5.4 Climate change management incentives
	5.5 Climate change scenario testing
6. Supplier	6.1 Strategy to influence suppliers to reduce their GHG emissions
	6.2 Activities to influence suppliers to reduce their GHG emissions
7. Clients	7.1 Strategy to influence clients to reduce their GHG emissions
	7.2 Activities to influence suppliers to reduce their GHG emissions
8. Engagement policy	8.1 Company policy on engagement with trade associations
	8.2 Trade associations supported do not have climate-negative activities or positions
	8.3 Position on significant climate policies
9. Business model	9.1 Integration of the low carbon economy in current and future business models

Assessment score

1. Business model and strategy
2. Consistency and credibility
3. Data quality
4. Reputation
5. Risks

Trend score

1. Probability of emissions changing
2. Changes to the business model and strategy

Disclaimer:

The information and assessments presented here do not in any way constitute investment or voting advice. Each organisation determines individually the most appropriate way to use this information.

Furthermore, the information and assessments contained in this document reflect a judgement at the time these assessments were made and do not guarantee that the company's most recent information has been taken into account, as such information may have been published between the time of the assessment and the publication or consultation of this document.