Europäisches Patentamt
European Patent Office
Office européen des brevets

Environmental Report 2025

Annex to the Annual Review

epo.org

Executive summary

The European Patent Office (EPO) continues to shape its future around sustainability, guided by the ambitions of the Strategic Plan 2028 (SP2028). In this context, 2025 marked a pivotal year on the path towards becoming a carbon-neutral organisation by 2030. Throughout the year, the Office balanced long-term modernisation and operational optimisation, ensuring that existing infrastructure and processes continued to perform efficiently while major upgrades took place.

This dual focus helped maintain a stable environmental performance: taken together, these developments resulted in a carbon footprint broadly in line with that of 2024, totalling 3 010 t CO_2e in 2025. This outcome underlines the importance of the building-related improvements now underway, which are essential to sustaining progress towards carbon neutrality by 2030 and delivering a long-lasting impact.

In 2025, the strategic foundations for the Building Investment Programme (BIP) were established, ahead of implementation from 2026 onwards, when its environmental benefits are expected to materialise.

In day-to-day operational optimisation, tangible progress was achieved in several areas. Energy consumption decreased by 10% across sites driven by the move to new and more sustainable premises in Berlin, responsible management of buildings, ongoing efficiency measures and the full decommissioning of the Shell building in The Hague in preparation for its deconstruction. Staff mobility patterns continued to evolve positively: emissions from commuting and teleworking declined by 20% compared with 2024, supported by the growing uptake of electric vehicles and other sustainable mobility options. At the same time, paper consumption reached a new low, with printed output dropping to 6.1 million sheets − 40% less than in 2024 − reflecting the continued digitalisation of the Patent Granting Process. The EPO is on track to meet the goal of becoming paperless in 2027.

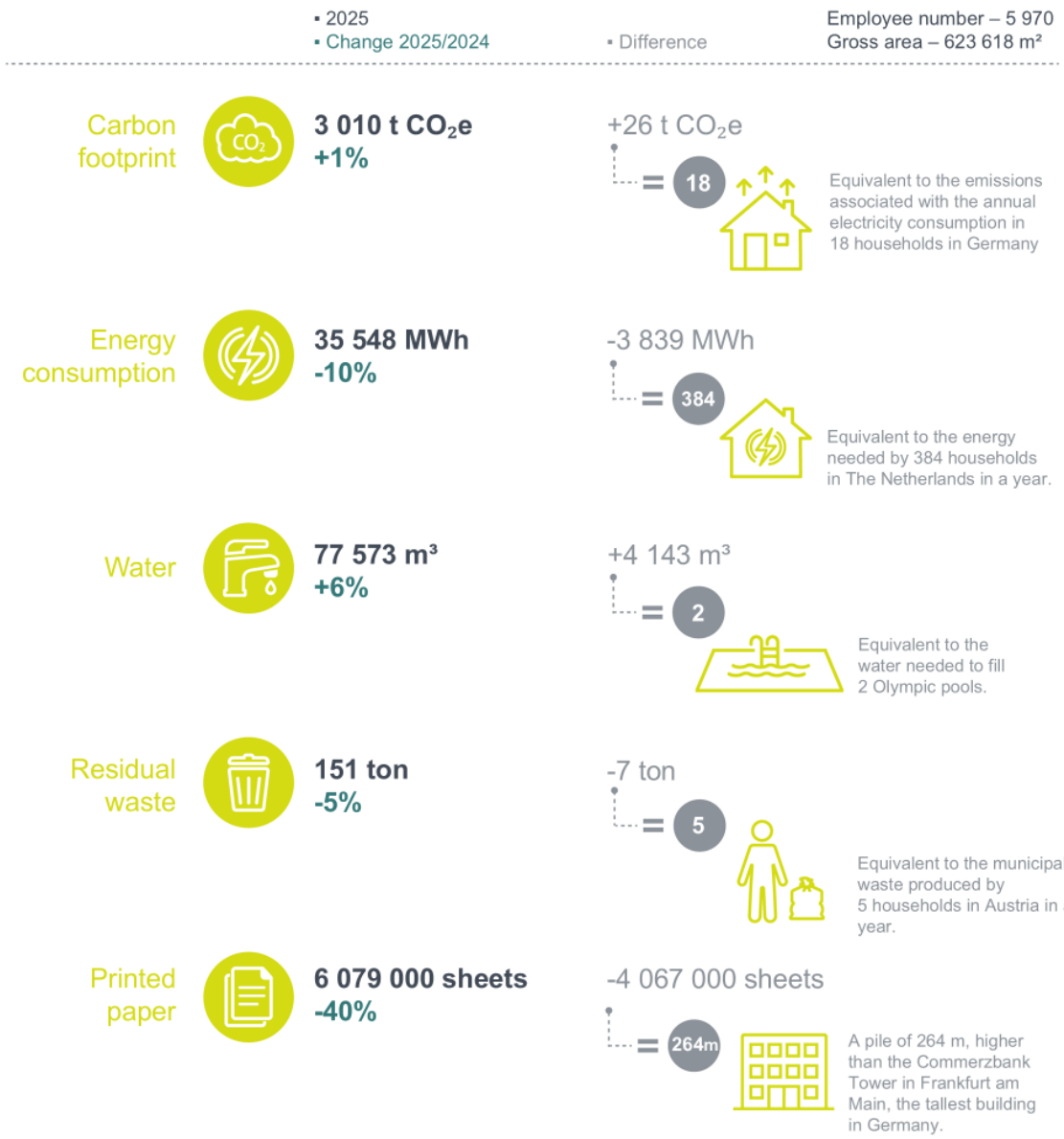
The year also highlighted structural challenges that require targeted action. Ageing technical installations led to cooling-agent leakages, significantly increasing scope 1 emissions. These issues are being tackled through targeted investments aimed at modernising the cooling infrastructure and reducing future risks. In parallel, business travel emissions increased compared with 2024, reflecting both an improved reporting methodology, resulting in more accurate (albeit higher) estimates, and evolving operational needs. Importantly, these emissions remain well below pre-pandemic levels.

Beyond operational performance, the EPO continued to strengthen its contribution to sustainability through sustainable procurement and knowledge sharing. In 2025, the Office expanded its portfolio of studies, insights, technology platforms and publications on emerging innovation trends, to include digital agriculture, advances in photovoltaic technologies and plastic waste management.

Looking ahead to 2026, the implementation of the BIP will be the primary driver behind improvements in environmental performance. In addition, organisational developments, notably the move of the EU Agency for Fundamental Rights

(FRA) headquarters to the EPO’s premises in Vienna and the relocation of the Boards of Appeal (BoA) to PschorrHöfe in Munich, will be reflected in the Office's environmental footprint. Together, these developments support the EPO's environmental sustainability objectives while enabling the efficient and forward-looking management of office space.

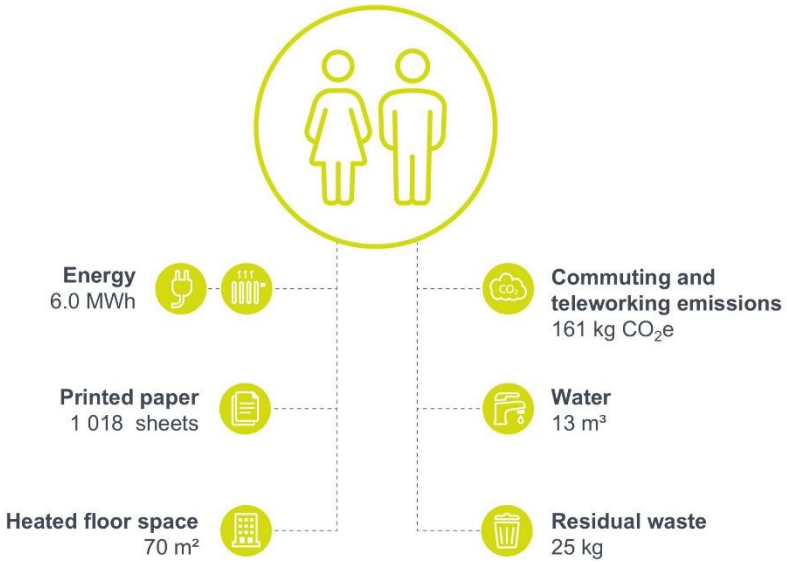
Figure 1 – Key environmental data*



Source: EPO

*In EMAS certified sites (Munich Isar, Munich PschorrHöfe, The Hague and Vienna) and rented sites in Berlin and Brussels. Details on the scope of the reported carbon footprint are provided in 5.1 Greenhouse gas emissions.

Figure 2 – Average footprint per staff member in 2025*



Source: EPO

*In EMAS certified sites (Munich Isar, Munich PschorrHöfe, The Hague and Vienna) and rented sites in Berlin and Brussels.

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1. The European Patent Office

Founded in 1973, from the 16 signatory states of the European Patent Convention, the European Patent Organisation has now grown to 40 member states, including all 27 EU member states plus countries such as Norway, Switzerland and Türkiye. Today, it is one of the largest public service organisations in Europe, employing over 6 000 staff of 35 different nationalities. Of them, over 4 000 are highly qualified scientists and engineers working as patent examiners in all fields of technology.

The European Patent Office (EPO), the executive arm of the European Patent Organisation, examines European patent applications, enabling inventors, researchers, and companies from around the world to obtain protection for their inventions in up to 46 countries through a centralised and uniform procedure that requires just one application. The EPO is also the world's leading authority in patent information and patent searching.

As the patent office for Europe, the EPO fosters innovation, competitiveness and economic growth by delivering high-quality patents and efficient services. Innovation is essential to finding solutions that safeguard our planet for future generations. Through our core business of granting patents on inventions and making patent knowledge accessible to all, we contribute directly to technological advances that address climate change.

Headquartered in Munich with offices in Berlin, Brussels, The Hague and Vienna, the EPO has been certified since 2009 as complying with the Eco-Management and Audit Scheme (EMAS). The EPO owned buildings in Munich, The Hague and Vienna are registered EMAS sites and are presented in more detail in Annex 3. In 2022 the EPO adopted the GHG Protocol as its standard for reporting its carbon footprint (see 5.1 Greenhouse gas emissions).

EPO staff working in Berlin moved to a new rented office space in March 2025. To ensure comparability with prior reports, consumption figures relating to the previously rented office spaces in Berlin and Vienna are included in this report, which is issued in accordance with EMAS Regulation (EC) No 1221/2009, Commission Regulation (EU) 2017/1505 and Commission Regulation (EU) 2018/2026 and can be downloaded from our website (www.epo.org).

2. Our environmental policy

Every year, the impact of climate change on our planet is more tangible, making any mitigating or adaptive action increasingly urgent.

For this reason, the EPO is committed to becoming a more environmentally sustainable organisation.

This policy guides all aspects of our work in achieving this goal. By reducing the environmental impact of our operations and by fostering innovation and access to knowledge on climate change technologies, we also contribute to the United Nations Agenda 2030 and its Sustainable Development Goals.

Our principles:

- Take a holistic approach to meeting our commitments.
- Comply with relevant environmental legislation and regulations.
- Reduce our consumption of resources and minimise our environmental footprint by promoting re-use, recovery and recycling.
- Encourage and engage our staff to embrace sustainable behaviour.
- Join forces with our external stakeholders to work towards environmental sustainability.
- Highlight the role of intellectual property and innovation in mitigating climate change.

Our objectives:

- Become carbon neutral by 2030.
- Assess our carbon footprint, accounting for and reporting on direct and indirect emissions across the value chain of our activities according to the GHG Protocol.
- Implement initiatives to mitigate our environmental impact towards our carbon neutrality goal.
- Conduct business with responsible suppliers that respect the rule of law and human rights and recognise their responsibility to protect the environment.
- Engage with local, national and international institutions and organisations.
- Provide our staff with appropriate training, advice and information on how they can play their part.
- Report regularly and transparently to the public on the implementation status of this policy.

At the EPO, we are deeply committed to sustainability and ready to embrace new and more sustainable ways of working. Success can only be achieved by joining forces within and outside the EPO. Every stakeholder has an important role to play in making this policy successful and ultimately contributing to a more sustainable world.

3. Environmental goals

Within the framework of SP2028 with its sole goal, sustainability, the EPO is committed to becoming a carbon neutral organisation by 2030. This means working towards delivering our all our products and services with the lowest possible environmental impact, whilst maintaining our high-quality standards.

Our target supports the goal of the European Union's Green Deal (no net emissions of greenhouse gases by 2050) and contributes to the commitment of the United Nations Paris Agreement (limit global warming to well below 2 degrees, preferably 1.5 degrees Celsius, compared with pre-industrial levels).

To remain on track to reach this target, we must reduce our emissions and achieve a carbon footprint of 1 000 tonnes of CO_2e from operations by the end of 2028.

Our main direct impact on the environment is triggered by the operation of our buildings. The New Ways of Working (NWoW) policy offering staff broad flexibility on where they choose to work, has already enabled us to improve significantly our environmental performance, by managing office spaces responsibly and efficiently.

Environmental sustainability guides us in how we maintain and develop our existing buildings. All BIP projects aiming at reducing our energy consumption and related carbon emissions have now been launched and are progressing according to plan.

4. Assessment of environmental aspects

All EPO activities have a direct or indirect environmental impact. In accordance with our environmental policy, we strive to minimise this impact by applying an environmental management system and continually improving our environmental performance.

With the aim of establishing a basis for developing environmental objectives and measures, we assess our environmental aspects annually according to the following criteria:

- the potential harm or benefit to the environment
- the condition of the environment
- the size, amount, frequency and reversibility of the aspect or impact
- the existence and requirements of relevant environmental legislation
- the concerns of interested parties, including EPO staff.

This assessment is taken into consideration when developing new policies and measures for further improvement. Environmental aspects are subdivided into direct and indirect aspects (Figure 3 and Figure 4). To help assess their relevance and the need for action (significance), the aspects have been rated as follows:

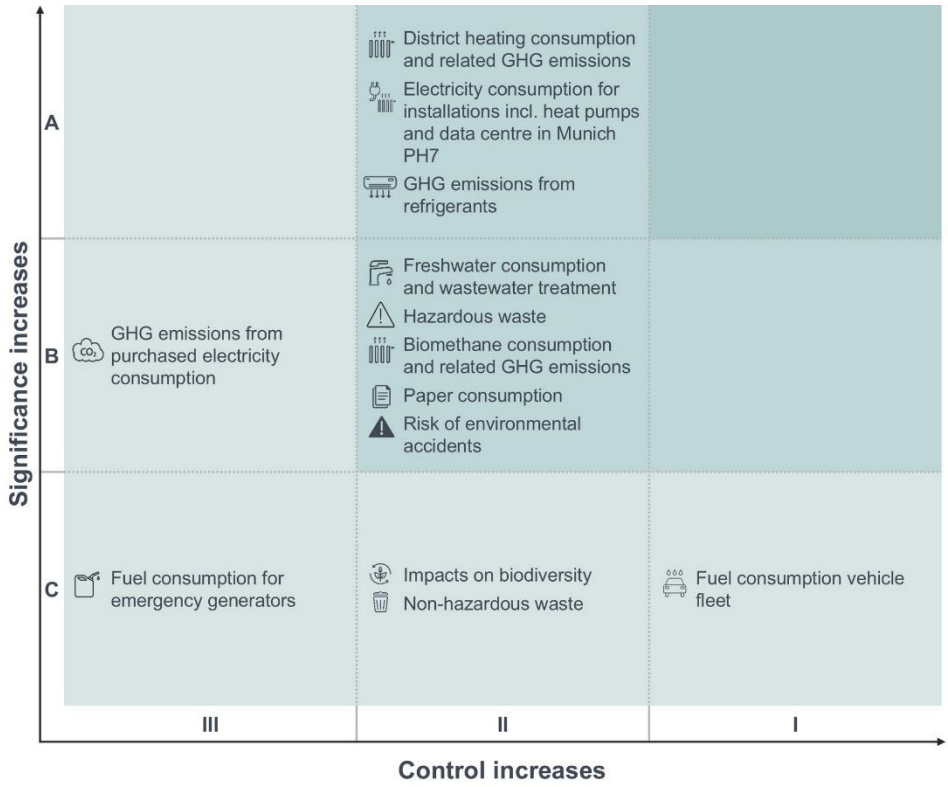
A = very significant environmental aspect with above-average need for action
B = significant environmental aspect with average need for action
C = less significant environmental aspect with low need for action.

In addition, the extent to which they can be influenced (control) is indicated by the following ratings:

I = short-term control possible
II = mid to long-term control possible
III = control not possible or possible only in the long term or subject to third-party decisions.

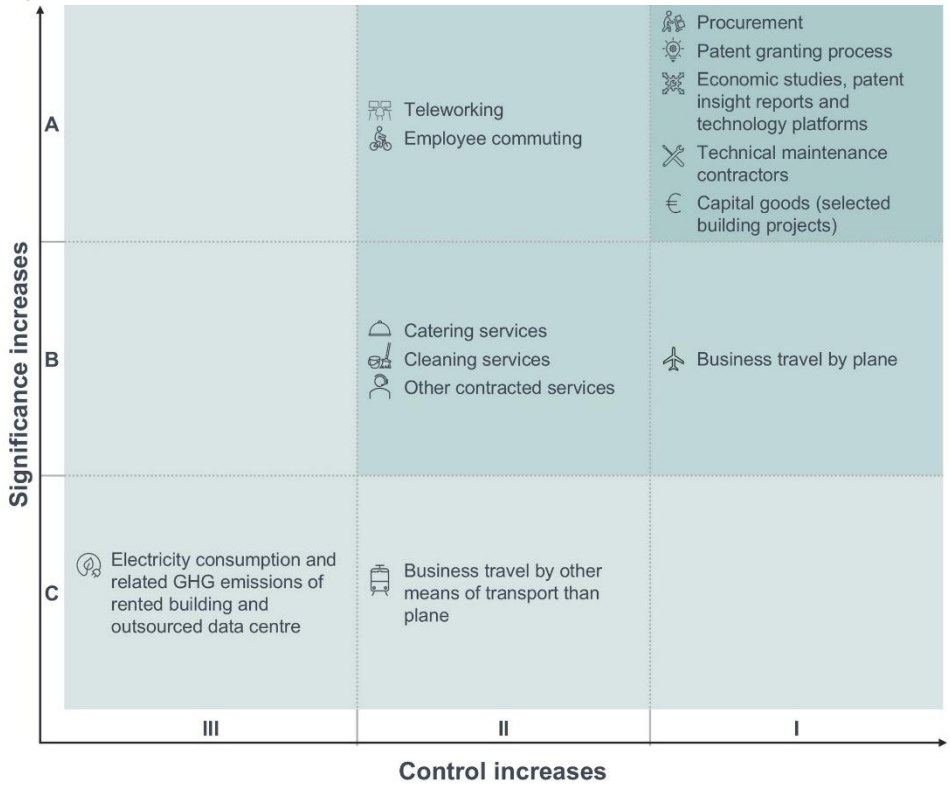
A detailed assessment of the direct environmental aspects per site is included in Annex 2.

Figure 3 – Direct environmental aspects of EPO activities



Source: EPO

Figure 4 – Indirect environmental aspects of EPO activities



Source: EPO

5. Environmental performance

5.1 Greenhouse gas emissions

The EPO aligns its accounting and reporting of emissions with the GHG Protocol standard with its well-known scopes[1] (Figure 5). Our GHG inventory includes emissions in scopes 1 and 2 for the owned sites Munich Isar, Munich PschorrHöfe, The Hague and Vienna. GHG emissions in scope 3 include the categories of fuel and energy-related activities (for the part not already included in scopes 1 and 2), transportation and distribution (upstream activities), waste generated in operations, business travel, employee commuting and teleworking, leased assets (Berlin, Brussels and the rented space in Vienna from November 2022 until October 2024) and major investments (capital goods).

Total Scope 1 and 2 GHG emissions from operations in 2025: 1 115 t CO2e

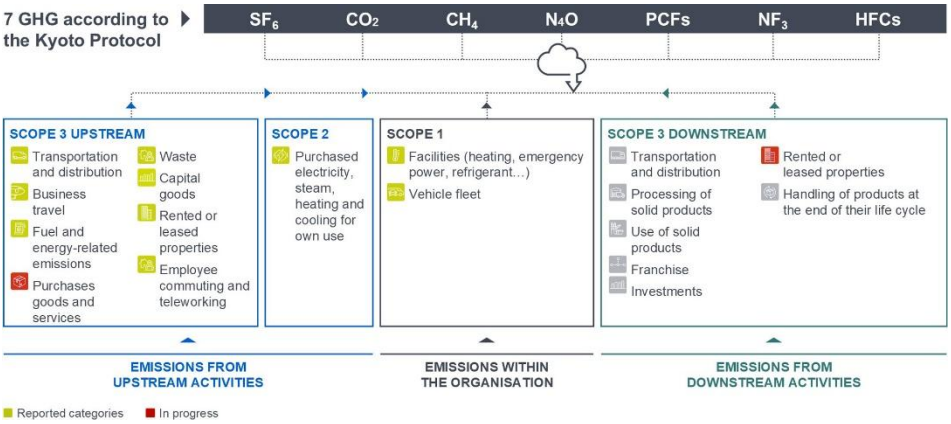
-77% compared with 2019

It is worth noting that the latter are part of the reported carbon footprint, however they are not included in our carbon neutrality target because these are

[1] Scope 1 includes direct GHG emissions from facilities owned or controlled by the reporting organisation, such as natural gas burnt at premises owned by the EPO, fuels used for owned vehicles or leakages of cooling agents. Scope 2 covers indirect GHG emissions from purchased energy, in our case electricity and district heating. Scope 3 includes all other indirect GHG emissions originating in the value chain. Emissions are indicated in CO_2 equivalents (CO_2e), which includes carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF_6) and nitrogen trifluoride (NF_3).

one-off capital investments, making it difficult to establish and monitor consistent, year-on-year reduction targets compared to operational emissions.

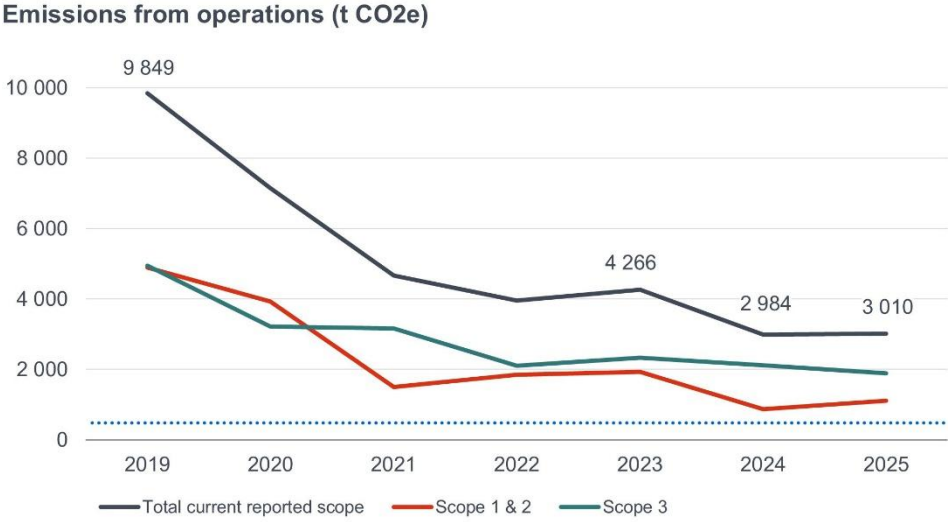
Figure 5 – Scope 1, 2 and 3 categories, according to the GHG Protocol



Source: EPO

In 2025, emissions from activities in operations in scopes 1, 2 and 3 totalled 3 010 t CO_2e and were very similar to the previous year (+26 t CO_2e). Figure 6 summarises the evolution of the reported carbon footprint since 2019, the first year the EPO accounted for its emissions according to the GHG Protocol. Over the period, total emissions have decreased by 69%, of which scope 1 and 2 emissions - over which EPO has a high level of control - decreased by 77%.

Figure 6 – Progress towards carbon neutrality



Source: EPO

Table 1 summarises our GHG inventory for 2019 (base year) and the last three years. Details of the methodology and emission factors[2] used, as well as site-specific scope 1 and 2 emissions, are included in Annex 1 and Annex 3 respectively.

[2] Emission factors are used to calculate the GHG emissions for a given source, relative to units of activity. They reflect average values by sector, technology type and/or fuel type.

Table 1 – GHG emissions (t CO_2e per year) [3]

	2019	2023	2024	2025	Change 2024-25 in %
Scope 1	**2 070**	**1 036**	**27**	**299**	**+1 023**
Facilities[4]	1 475	19	17	19	+10
Vehicle fleet	14	11	6	4	-26
Loss of cooling agents	581	1 006	4	276	+7 631
Scope 2	**2 829**	**893**	**841**	**816**	**-3**
Purchased electricity[5]	-	-	-	-	
District heating	2 829	893	841	816	-3
Scope 3	**4 950**	**2 337**	**2 116**	**1 895**	**-10**
Fuel and energy-related activities not included in scope 1 or 2	1 194	356	195	141	-28
Upstream transportation and distribution	-	249	157	137	-13
Waste generated in operations	-	88	53	40	-24
Business travel[6]	1 297	130	144	354	+146
Employee commuting and teleworking[7]	1 984	1 154	1 199	963	-20
Upstream leased assets (Berlin[8], Brussels[9] and Vienna rented space)	474	361	368	259	-30
Total emissions from operations	**9 849**	**4 266**	**2 984**	**3 010**	**+1**
Scope 3 Capital goods (major building investments)			**1 017**		
Total non-biogenic emissions	**9 849**	**4 279**	**4 001**	**3 010**	

[3] Totals or percentage changes may not reflect the displayed data because of rounding.
[4] 2024 figure corrected compared to previous report.
[5] For calculating GHG emissions from purchased electricity, we use the market-based approach from the GHG Protocol, reflecting the emissions from the electricity mix (100% green electricity) purchased by the EPO via its electricity contracts. Using the location-based approach, emissions amount respectively to 14 966 t CO_2e (2019), 9 277 t CO_2e (2023), 7 512 t CO_2e (2024), and 6 191 t CO_2e (2025).
[6] 2023 and 2024 figures corrected compared to previous report to exclude business travel of the BoA.
[7] 2023 and 2024 figures updated compared to previous report based on new emissions factors.
[8] 2024 figure updated compared to previous report with consumption figures from the landlord in Berlin. 2025 figure based on provisional meter readings by the landlord and own estimates.
[9] Brussels' rented space is included as of 2025.

Biogenic CO_2[10]	**-**	**930**	**393**	**233**	**-41**

Scope 1 emissions

Scope 1 emissions increased by 1 023% (+273 t CO_2e) compared with 2024. The increase was due to cooling agent losses in technical installations that have reached the end of their lifespan. Accordingly, investments are foreseen within the BIP to reduce the risk of leakages.

Other scope 1 emissions originate from the operation of vehicles, from biomethane consumption for heating in The Hague (methane and nitrous oxide), and from the diesel and heating oil consumption of our emergency generators in Munich and The Hague. The latter increased by 10% compared with 2024 because maintenance on the electrical system resulted in increased fuel consumption by the emergency generators.

Scope 2 emissions

Scope 2 emissions include emissions from purchased electricity in Munich, The Hague and Vienna and from district heating in Munich. Given that the EPO has purchased green electricity since 2019, emissions from electricity consumption equal zero according to the market-based calculation approach.

Emissions from district heating decreased by 3% in 2025 compared with the previous year (-25 t CO_2e). The main drivers for this decrease are presented below in 5.2 Energy.

Scope 3 emissions

In comparison to the previous year, scope 3 emissions decreased by 10% (221 t CO_2e).

Upstream emissions from the supply chain of the electricity, biomethane and fuel consumed at our own sites[11] decreased by 28% (54 t CO_2e) in comparison to 2024. This positive result is due to the energy saving measures detailed in 5.2 Energy.

Emissions from logistic services purchased by the EPO (scope 3 category Upstream transportation and distribution), which relate to letters, parcels and other deliveries mainly sent from our sites in Munich and The Hague, are reported according to primary data from our service providers or, when not available, estimated based on the number of items sent, and emission factors from the International Post Corporation (IPC).

[10] According to the GHG Protocol, direct CO_2 emissions from biologically sequestered carbon (e.g., CO_2 from burning biomass/biofuels) are reported separately from scopes 1 to 3.

[11] According to the GHG Protocol, the category includes: emissions for the extraction, production and transportation of fuels consumed at EPO premises; emissions for the extraction, production and transportation of fuels consumed in the generation of electricity, steam, heating and cooling consumed by the EPO; and transmission and distribution losses.

Reported emissions have decreased by 13% compared with 2024 as the number of documents sent and the corresponding amounts of printed paper continued to decrease, reflecting the uptake of the MyEPO services[12] and cited patent literature in search and examination proceedings only being available in electronic format as of October 2024 (see 5.4 Paper).

The category "Waste generated in operations" covers the disposal and treatment of both solid waste and wastewater produced in our operations by third parties. The impact is assessed by applying the waste-type-specific method which involves using specific emission factors per type of waste and method of treatment (e.g., recycling, incineration, or landfill).

Emission conversion factors from the UK Department for Environment, Food & Rural Affairs (DEFRA), which are highly regarded in the literature, are used in the absence of primary data and comprehensive sources specific to our hosting countries. Compared to 2024, emissions from waste generated in operations decreased by 24% in 2025 (see 5.6 Waste).

In 2025, emissions from the scope 3 category "Business travel" totalled 354 t CO_2e, 146% greater than 2024. This increase reflects the evolving operational needs of our organisation, whilst remaining well below pre-pandemic levels (-73% compared to 2019). More details are provided under 5.7 Business travel.

The combined estimated emissions from "Employee commuting and teleworking" decreased by 20% compared with 2024 (-236 t CO_2e), mainly because of the increased adoption of electric vehicles. Overall, they account for 32% of the EPO's total reported emissions in 2025 (see 5.9 Employee commuting and teleworking).

Building-related emissions (electricity, natural gas, district heating, cooling agents) at our rented sites in Berlin and Brussels, which are not part of the EPO's EMAS registration in view of our limited operational control, represent 9% of the EPO's reported carbon footprint (259 t CO_2e).

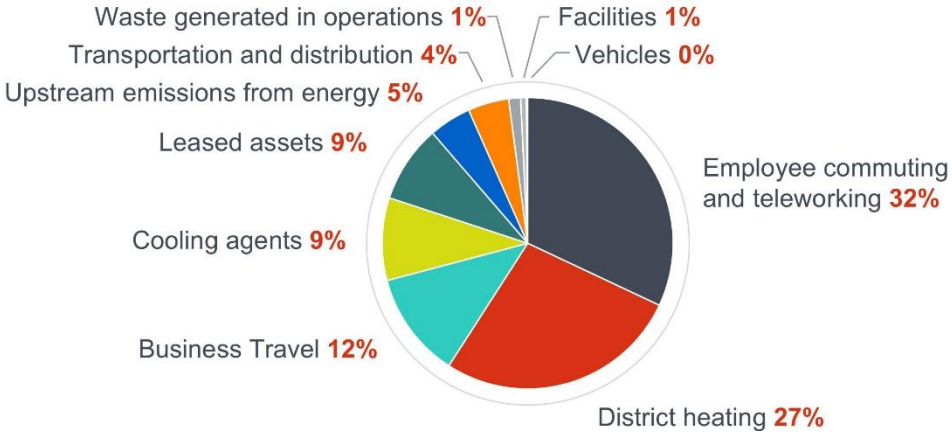
Since March 2025, our new office premises in Berlin, which combine modern office design with environmentally sustainable features such as natural lighting, energy-efficient systems, smart LED lighting and photovoltaic panels, reflect our commitment to sustainability.

These features reduce energy consumption and CO_2 emissions by a factor of 10 compared with the former rented building. The central location, excellent public transport connections and cycle parking with e-charging facilities encourage green commuting.

Figure 7 summarises the proportion of non-biogenic emissions per reported category.

[12] Our secure services are designed to make it easy to file patent applications and submissions, interact with EPO during European Patent, Unitary Patent and PCT proceedings, pay fees and claim refunds.

Figure 7 – Non-biogenic GHG emissions from operations in 2025 (% of total)



Source: EPO

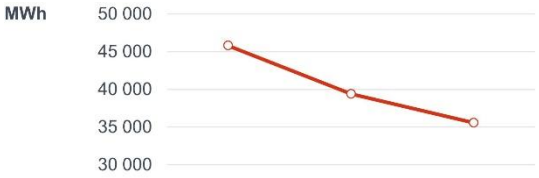
Finally, biogenic CO_2 emissions decreased by 41% in line with the reduction in the consumption of biomethane in The Hague (see 5.2 Energy).

Looking forward, the relocation of the BoA to PH7 will influence the EPO reported carbon footprint. To preserve year-on-year comparability, the base year 2019 and the years 2024 and 2025 will be recalculated to include estimated emissions from its current building in Munich Haar.

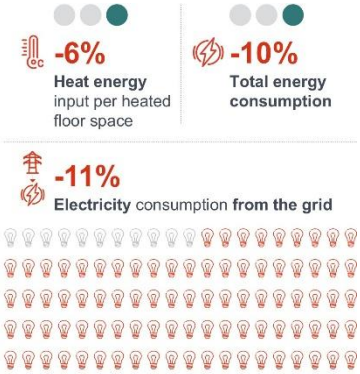
Following the FRA's move to our Vienna premises, the EPO will begin accounting for and reporting on the scope 3 category "Downstream leased assets" as of the Environmental Report 2026.

In addition, the Office will continue to collect data on emissions associated with the scope 3 category "Purchased goods and services", reinforcing our commitment to capture all significant emission sources and to establish a comprehensive understanding of the environmental impact of our operations (see 5.5. Sustainable information and communication technology and 5.8 Other purchased goods and services).

5.2 Energy



	2023	2024	2025	Change 2024-25 in %
MWh	45 795	39 386	35 548	-10
MWh/employee	7.6	6.5	6.0	-9
MWh/m²	48	38	36	-6



Energy consumption in the form of electricity and heating is the most significant environmental aspect at the EPO. Overall, total energy consumption reduced by 10% compared with 2024, decreasing from 6.5 to 6.0 MWh per employee (see Table 2 in Annex 3 for details on energy input by source). Heating energy at the different sites is generated from various sources: district heating in Munich and in the new premises in Berlin, heat pumps in The Hague (Main building) and in Vienna, biomethane in all buildings in The Hague, natural gas in the old premises in Berlin (until February 2025)[13].

Total electricity generated on site in 2025:
184 MWh

+165%
compared with 2024

Electricity consumption essentially consists of electricity used by:

- cooling/heating systems
- ventilation and air conditioning
- IT equipment (e.g., data centres, workstations and printers)
- lighting in offices and public areas (e.g., canteens, parking), and other equipment.

Consumption of electricity from the grid decreased by 11% compared with 2024. The main drivers for this decrease were the further optimisation of the consumption in the empty buildings PschorrHöfe 5-7 in Munich and Shell in The Hague. Moreover, with the Vienna building fully in operation, electricity generated on site rose by 165% from 69 to 184 MWh.

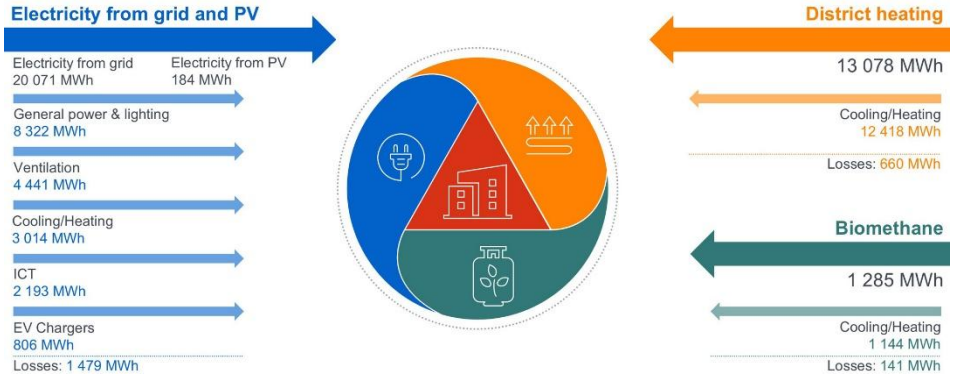
In Munich, district heating consumption was 3% higher than in 2024. However, once adjusted for the significantly colder weather, heating performance shows an estimated 6% reduction compared with the previous year. In The Hague, biomethane consumption decreased by 41% following the decoupling of the Shell building and boiler optimisation in the Hinge and Main buildings. Heat energy input per unit of heated floor space dropped from 38 to 36 kWh per square metre across all EPO owned buildings.

Routine monthly maintenance tests of emergency generators are conducted at both the Munich and The Hague sites. In Munich, maintenance on the electrical system resulted in increased fuel consumption by the emergency generators.

[13] The energy consumption from the Luxembourg data centre is not included as differences in methodological approaches and system boundaries would impair the comparability of the reported figures. Related emissions will be accounted for under the category scope 3 "Purchased goods and services" upon its inclusion in the reported carbon footprint.

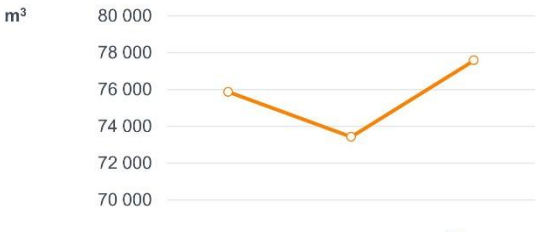
Figure 8 is a representation of the energy consumption in owned buildings by source and purpose (e.g., main categories of usage).

Figure 8 – Estimated energy flows in owned buildings associated with main input sources and purposes[14]



Source: EPO

5.3 Water



	2023	2024	2025	Change 2024-25 in %
m³	75 864	73 430	77 573	6
m³/employee	12.6	12.2	13.0	6

Rainwater harvesting provided 72 m³ of water for irrigation and facilities in Vienna

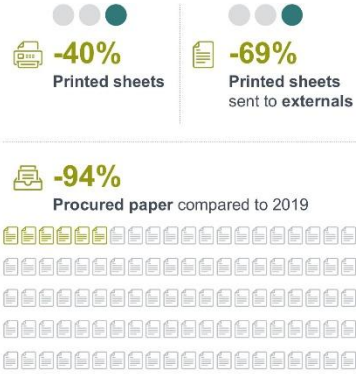
At all sites, water is provided by the municipal supplier. It is mostly deployed in sanitary facilities and kitchens. In Munich and in The Hague, water is also used for the air conditioning systems and for watering plants and green spaces on site. Wastewater contamination consists mainly of organic substances. Where needed, grease traps are installed in specific locations to remove contaminants from wastewater.

Water consumption increased by 6% in comparison to 2024[15], mainly because of isolated leaks in The Hague and issues with the water management system in Vienna which have all been rectified (Table 3 in Annex 3). In the renovated Vienna building, the integration of a rainwater harvesting system met a share of the irrigation and facility-related demand, reducing the consumption of freshwater accordingly.

[14] Electricity from grid and self-produced including energy losses from transmission, distribution and transformation.
[15] 2023 and 2024 figures corrected compared to the previous report.

5.4 Paper

	2023	2024	2025	Change 2024-25 in %
Printed sheets	13 949 558	10 146 377	6 079 216	-40
Per product	37	25	15	-42
Procured paper	13 800 000	10 240 000	7 420 000	-28



Paper consumption is measured as input (paper procured) and output (sheets printed). The former is relevant for assessing the carbon footprint of the goods we purchase; the latter better reflects the impact of the digitalisation of our core business and corporate services.

Sheets mailed to externals in 2025: 1.5 million

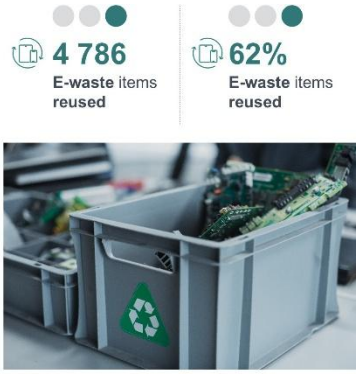
-69%
compared with 2024

In 2025, paper procured decreased by 28% compared with 2024. Printing reached a record low of 6.1 million sheets, 40% less than in the previous year with printed paper consumption per EPO product[16] decreasing by 42%. About 25% of printed sheets related to documents mailed to externals (1.5 million sheets, -69% compared with 2024).

The continuous growth in the number of users of MyEPO and the extension of the MyEPO functionalities are expected to enable further reductions in the number of documents we print and mail to externals and, together with the necessary legal changes, lead to a paperless patent granting process by 2027.

5.5 Sustainable information and communication technology

	2023	2024	2025	Change 2024-25 in %
E-waste reused items	3 536	3 613	4 786	32
E-waste recycled items	6 494	11 400	2 915	-74



The new ecoDesign framework will help to reduce the footprint of EPO software developed in-house.

[16] EPO products filing, search, examination and opposition

More than 4% of global greenhouse gas emissions come from the IT sector[17], and ICT emissions are growing even faster, driven by digitalisation, artificial intelligence, and data demand. Moreover, considered globally, electronic waste or e-waste is considered the fastest growing domestic waste-stream. It amounted to 62 million metric tonnes in 2022, an increase of 82% from 2010, and is expected to increase further to 82 million tonnes, by 2030[18].

As a knowledge-intensive organisation, the EPO is highly dependent on information and communication technology (ICT) for its core business and will become even more so as it continues to digitalise all its processes. ICT sustainability is therefore an essential aspect of the EPO's environmental performance.

With increasing demands on ICT systems and end-to-end digital workflows, it is essential to choose environmentally friendly options and find sustainable and efficient ways to operate them. To facilitate smart, sustainable decisions concerning its ICT systems, the EPO has developed a specific policy on ICT sustainability. This policy is regularly updated; the latest version came into force at the end of 2025.

Our objective is to reduce the environmental footprint associated with ICT assets, including their electricity consumption. This is achieved, for example, by streamlining and digitalising business processes in close co-operation with the relevant business areas. A further example of how we have successfully embedded ICT sustainability in our operations is our treatment of e-waste. Here, we aim to maximise the number of devices repaired and reused upon disposal from the EPO.

In driving digital transformation, the EPO will be mindful of the environmental impact of digital technologies by extending our measurement of GHG emissions to cloud services and applying circular economy principles to the lifecycle of our digital equipment. In 2025, we also developed an ecoDesign Framework to minimise environmental impact by optimising energy consumption, reducing data transfer, and enhancing hardware longevity throughout the software lifecycle.

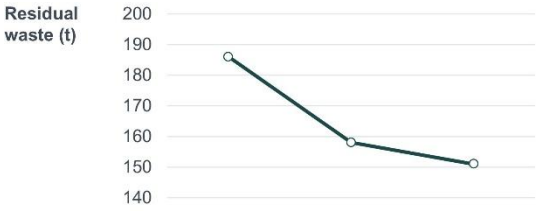
The treatment of e-waste, a substantial part of the reported hazardous waste (see below 5.6 Waste), is managed via a dedicated service provider. In 2025, almost 8 000 IT equipment items were disposed of. Most of the items were given a second life (62%) while the rest were recycled, a concrete example of our commitment to UN SDG 12 − Responsible Production and Consumption.

Overall, our aim is to build a culture of ICT sustainability across the EPO. Internally designed online digital training modules on "E-waste Sobriety", "Digital Responsibility", and the "ecoDesign Framework" are available for all staff and are mandatory for all newcomers and Young Professionals.

[17] "World Bank. 2023. Green Digital Transformation: How to Sustainably Close the Digital Divide and Harness Digital Tools for Climate Action. Climate Change and Development Series. © Washington, DC: World Bank. License: CC BY 3.0 IGO."
[18] Global e-Waste Monitor 2024: Electronic Waste Rising Five Times Faster than Documented E-waste Recycling (UNITAR/ITU, 2024).

Additionally, we promote ICT sustainability in regular annual events, including the Digital Clean-up Day and the International E-waste Day.

5.6 Waste



	2023	2024	2025	Change 2024-25 in %
Residual waste (t)	186	158	151	-5
Paper waste (t)	471	160	154	-4

Wastepaper and residual waste constitute the main categories at all sites (Table 4 in Annex 3), and the EPO has established a waste separation system with clearly identifiable and distinguishable waste containers on all sites. Staff are briefed on waste avoidance, recycling and correct disposal.

Goal of zero-waste pilot:

30 g waste per on-site person per day

In 2024, wastepaper decreased significantly compared with 2023 (-66%), when paper archives were disposed of in Munich and The Hague. The positive trend continued in 2025, albeit at a slower pace, as paper consumption decreased (see 5.4 Paper above).

Residual waste, which had peaked in 2023 due to several clearing actions, returned to previous levels in 2024. This downward trend continued in 2025, with a further 5% reduction. To build on this progress, the Office has launched a zero-waste pilot in The Hague aimed at reducing everyday waste from offices and shared spaces, aiming at 30 grams per on-site person per day. Depending on the results of the pilot, it may be extended to additional sites.

A more sustainable coffee experience

Around 250 000 paper cups were used each year in our premises in The Hague. The thin plastic lining in these cups prevented recycling or composting, meaning that they were discarded as general waste.

From December 2025, paper coffee cups and plastic milk packets have been replaced by porcelain cups, drinking glasses, and milk powder sticks in all kitchenettes in The Hague, the coffee corner, and the Hinge canteen.

Moving to reusable cups and glasses reduces waste and aligns with European and Dutch sustainability standards and the Office's environmental objectives.
The transition also promotes a circular approach: items are used, cleaned, and reused, rather than being disposed of after a single use.

5.7 Business travel

Leveraging the benefits of the NWoW and digital videoconferencing tools, a wide range of activities, including training and outreach, take place primarily in hybrid format or completely online, reducing the need for duty travel.

When travelling is necessary, in line with our key principles of sustainable duty travel, EPO staff are invited to "plan green", choosing environmentally friendly forms of transport where feasible, and "plan smart", prioritising travel that focuses on relationship-building or combining multiple trips in a single mission of longer duration if possible.

GHG emissions from air travel in 2025:
354 t CO_2e

+146%
compared with 2024

Business travel emissions in 2025 total 354 t CO_2e, an increase of 146% compared with 2024[19] (Table 5 in Annex 3), a figure that remains well below the almost 1 300 t CO_2e emissions reported pre-pandemic (2019).

This increase reflects both the impact of the methodology used by the new service provider for reporting flight emissions, resulting in higher albeit more accurate estimates, and the evolving operational needs of our organisation.

5.8 Other purchased goods and services

In line with its Sustainable Procurement Policy, the Office seeks to achieve high standards of integrity, inclusivity, transparency and stewardship in its supply chain. The Office is committed to conducting business with responsible suppliers – companies that respect the rule of law and human rights, understand the nature and impact of the products, materials, and production and transport methods they provide and use, and recognise their responsibility to protect the environment.

Suppliers are evaluated against EPO-specific sustainability requirements, both environmental and social. We have continued our efforts to assess the emissions associated with the goods and services we purchase, aiming at including them in the perimeter of our reported emissions.

Moreover, in 2025, sustainability criteria were integrated into contracts covering a wide range of environmental matters, such as for technical planning for energy optimisation and for the renovation of the Isar building in Munich. Finally, building on the results of the previous years, we continued to convert our office supplies to equivalent green versions, and environmentally friendly products now constitute over 94% of the total.

5.9 Employee commuting and teleworking

	2023	2024	2025	Change 2024-25 in %
tCO_2e	1 154	1 199	963	-20
Vehicles parking	206 437	202 986	187 777	-7
EV charging sessions	27 077	34 237	46 154	35

In 2025, the combined estimated emissions from commuting and teleworking amounted to 963 t CO_2e, 20% lower than in 2024, with the number of cars using the parking spaces in our owned buildings

EV charging sessions in 2025:
46 154

+35%
compared with 2024

[19]Vis-à-vis last year's report, 2023 and 2024 data have been corrected to exclude business travel from the Board of Appeals.

decreasing by 7%.

To promote more sustainable mobility choices, the Office strengthened staff awareness through a set of complementary initiatives.

A dedicated microlearning module on green mobility highlights the benefits of different transport options, while a commuting dashboard accessible to all staff raises awareness of the emissions associated with daily travel to and from work.

These tools are complemented by the sustainable mobility guide, first published in 2022 and regularly updated with contributions from colleagues, which provides practical information on the sustainable transport options available at all EPO sites.

Moreover, our sustainable mobility guide highlights the sustainable transport options available at all our sites. First published in 2022, it is regularly updated with additional information provided by our colleagues.

In 2025, the cycle parking of the Main building in The Hague was enhanced for a better commuting experience. With an area of 1 600 m², the upgraded parking provides 620 spaces for all types of bicycles and includes several new features such as a new ramp to improve accessibility, 30 e-charging stations for e-bikes and spacious parking zones suitable for cargo bikes.

Overall, on our owned premises, we have installed over 1 870 bike parking spaces and dedicated repair stations. Charging stations and lockers for e-bike batteries are also available.

To support colleagues who still need to drive to work while transitioning to more sustainable solutions, 20% of the parking spaces in Munich, The Hague and Vienna are equipped with electric vehicle (EV) charging points, providing green electricity free of charge. Accordingly, we take into consideration the number of EV charging sessions (+35% compared with 2024) in estimating emissions from employee commuting (see Annex 1 Methodology), which is the main driver behind the reduction in 2025 employee commuting emissions (-26%).

5.10 Capital goods

Capital goods are assets that organisations use to manufacture products and provide services (e.g., equipment, machinery, buildings, facilities, and vehicles). In this category, we report emissions relating to the acquisition or refurbishment of our owned buildings, i.e. major investment projects. Emissions from other purchased goods considered assets in the EPO financial accounting will be reported under the scope 3 category "Purchased goods and services" (see 5.8 Other purchased goods and services).

The renovation of the Vienna building, completed in 2024, was the first project reported under this category. Within the BIP, several projects have been launched that will reduce the consumption of purchased energy and related GHG emissions (e.g., second internal facade in our Isar headquarters and Shell building deconstruction, see boxes below). The emissions relating to their execution phases will be reported here upon the projects' conclusion.

Shell building deconstruction – enabling a low impact transition

Completed in 1983, the Shell building has reached the end of its operational life. It no longer meets the standards expected of modern office buildings and would require extensive and costly renovation to comply with current technical and energy efficiency requirements.

In this context, the EPO has decided to decommission the building and return the site to greenfield status. The approach allows retention of the plot as a long-term real estate asset while significantly reducing operational and maintenance requirements, as well as the plot's environmental impact.

During the preliminary planning phase, ecology specialists surveyed the area in line with European and Dutch environmental regulations. Using bat detectors and thermal imaging cameras, they confirmed that the protected common pipistrelle bat (Pipistrellus pipistrellus) had been nesting in small gaps in the Shell building's façade.

As this species is important for the local ecosystem, especially for controlling insects, several measures were put in place in co-operation with local nature protection authorities to protect the bat's habitat during the project. These measures include installing bat boxes along the canal near Tinbergen Street, two nesting towers in the main garden, and a façade-mounted nesting box on the roof garden of the New Hinge building.

The project is being implemented in three phases. The first phase, which is complete, focused on decoupling the Shell building's technical installations, which were highly integrated with the rest of the site. In the second phase, the building will be deconstructed placing emphasis on the reuse and recycling of disassembly and demolition materials, with the objective being to send less than 5% of the building materials to general waste. In the final phase, the cleared area will be completed with basic green landscaping, ensuring a safe and stable condition of the site that supports future flexibility over its use.

Isar building modernisation – combining heritage preservation and energy efficiency

The Isar building, our headquarters in Munich, is an important part of the EPO's history and identity. Built in 1980 and partly protected as a historic monument, it is valued for its location and architecture. At the same time, its ageing systems make it the most energy-intensive building at the EPO.

Therefore, the EPO has launched a major modernisation project as part of the BIP. The goal is to make the building much more energy-efficient while preserving its distinctive look and character. Early improvements focused on better daylight and workplace quality, for example by replacing closed corridor walls with glass partitions. The current works cover the building façade, technical systems and key interior areas such as ceilings, kitchens, sanitary facilities, and the entrance hall.

A major challenge is reducing energy use while respecting the rules for listed buildings. Since external sun-shading was not possible, an alternative solution was developed inside the building: an internal thermal façade with integrated sun protection to prevent overheating without changing the outside appearance. New opening and closing windows will allow staff to control fresh air individually, improving comfort.

The project is also replacing outdated heating and cooling systems with modern, energy-efficient solutions, including ceiling heating and cooling systems and demand-driven ventilation. Smart technologies such as motion sensors, CO_2 sensors and window contacts automatically reduce energy use when rooms are empty or windows are open. Wherever possible, existing materials are reused, and lighting is upgraded to efficient LED systems.

Construction started in December 2025 and will continue for around two years while the building remains in use. Once completed, the Isar building will combine its original design with modern standards for energy efficiency, comfort and sustainability.

5.11 Communication and staff engagement

Progress on our journey to carbon neutrality is reported transparently, ensuring that our staff, the member states and other stakeholders all have a clear view of how we are advancing. Through targeted internal and external communication, the EPO both promotes sustainable thinking and engages staff as multipliers of its environmental policies and initiatives.

Following the launch of the BIP at the end of 2024, an intranet section on "What is happening in our buildings" and dedicated news articles informed staff about projects and plans to renovate our buildings and make them more sustainable, contributing to our goal of carbon neutrality by 2030. Examples include articles on reducing energy consumption, increasing the use of renewable energy and further improving the facilities available for green commuting.

Other examples include a new maintenance concept to increase biodiversity in the Office's green spaces. We also raised staff awareness of the Office's environmental efforts by communicating about the Vienna building being awarded the highest BREEAM rating, the world's leading sustainability standard for buildings, in the DACH region (Germany, Austria, Switzerland) and winning three awards in recognition of its sustainable design and urban impact.

The sustainability section on our intranet was also updated in 2025 to align with the Environmental, Social, Governance and Finance (ESG and F) approach that the Office takes to sustainability and the priorities outlined in SP2028.

Initiatives to promote environmental awareness were organised for staff during the Campus Days in May and October and were well attended. Activities included Climate Fresk workshops, food collections for charity and an interactive board game developed by Young Professionals.

Environmentally relevant international occurrences were promoted via social media campaigns and targeted internal communication. Examples were "Earth Hour", "Earth Day", "World Water Day" and "International Zero Waste Day".

Our Environmental Group promoted bicycle repair services at our buildings and organised donation campaigns of satchels and toys. The "EcoChat", an informal channel for colleagues to exchange ideas, best practices and tips on environmental matters, continued to grow, reaching almost 500 members by the end of 2025.

All initiatives were the outcome of cross-departmental collaboration and recorded high levels of participation, confirming that these topics are close to the hearts of our staff.

5.12 Impact of services

The EPO promotes technology intelligence to support innovation for a more sustainable future, inspiring and empowering innovators and the general public to tackle the sustainability challenge. Based on patent data, the EPO analyses emerging technologies and their role in shaping the future and key innovation areas, and provides a deeper understanding of how technological advancements address global challenges

such as the climate crisis. Reports, studies and technology platforms on specific topics are produced mostly in collaboration with international organisations. This dynamic engagement of stakeholders brings complementary expertise and a plurality of views.

Our smart technology platforms make patent intelligence more easily available to our users via ready-made searches which can be input into our Espacenet database with just a few mouse clicks, thus supporting ongoing research or potentially sparking new ideas. Our patent insight reports focus on innovation trends in emerging technologies, using patent knowledge to analyse up-and-coming industries and provide insights into potentially transformative technologies. Finally, our studies provide high-level expertise and analysis on innovation topics.

In 2025, the EPO released a comprehensive highlight report "Patents paving the way to a more sustainable future", updated in the first quarter of 2025, links 41 of the EPO's most recent knowledge initiatives to 11 UN Sustainable Development Goals (SDGs). The report outlines the main examples of how patent knowledge serves as a catalyst for innovation and positive change: EPO technology platforms, patent insight reports and studies.

In 2025, three projects were completed, comprising studies, smart technology platforms and updates to the EPO's Deep Tech Finder, relevant mainly to UN SDG 2 Zero Hunger, UN SDG 7 Affordable and Clean Energy and UN SDG 12 Sustainable Consumption and Production.

In relation to UN SDG 2, the EPO, in co-operation with European and Latin American national patent offices, released a study on "Digital agriculture − towards sustainable food security", highlighting how digital agriculture could provide enough food to feed the world while reducing the need for water, fertilisers and pesticides through more efficient and sustainable farming principles. The study also contributes to UN SDGs 12 Responsible Consumption and Production, 13 Climate Action, 14 Life Below Water and 15 Life on Land. This publication was accompanied by a smart technology platform where users can easily identify patents mapped to 47 search concepts relevant for digital agriculture technologies.

Contributing to UN SDG 7, the EPO released a study on "Advances in photovoltaics − technology trends for solar energy". This study highlights the important role of photovoltaics to support cleaner, more secure and more sustainable energy systems (also relating to SDGs 9 Industry, Innovation, Technology and Infrastructure, 11 Sustainable Cities and Communities, and 13 Climate Action).

In connection to UN SDG 12, the EPO launched a study on "Plastics in transition – technologies for plastics waste management", which examines technology developments in plastic waste management and analyses innovative solutions for waste recovery and recycling (also contributing to SDGs 6 Clean Water and Sanitation, 14 Life Below Water and, 15 Life on Land). This publication was complemented by a smart technology platform allowing users to quickly navigate patents mapped to 70 relevant concepts of plastics waste management technologies and new alternative materials.

6. Action plan

In accordance with our environmental policy, we seek to minimise the direct environmental footprint of our operations. The action plan includes deliverables from the Building Investment Programme and actions for the continuous improvement of our environmental performance, including suggestions from internal and external audits, and suggestions from staff and environmental groups. It also takes account of best environmental management practices as recommended in the European Commission's sectoral reference document for public administration[20] and uses them as inspiration in developing improvement measures.

The tables below present the main actions implemented in 2025 and those planned as of 2026. Measures regarding technical installations relate exclusively to the buildings owned by the EPO, as rented buildings are operated and maintained by the respective landlords. Where applicable, the estimation of the benefits is quantified on the basis of available information.

Total number of improvement measures completed in 2025: 10

Table 7 – Status icon

Completed		Cancelled	
In progress		Planned	

6.1 Action plan 2025: initiatives completed and on-going

Action	Site	Benefits	Status	Impact
Move to new premises in Berlin	Berlin	Reduce energy consumption and related emissions[21]		
Installation of solar panels in PH 7-8	Munich PH	Reduce scope 3 emissions from purchased energy consumption		
Bicycle parking optimisation	The Hague	Reduction of emissions from employee commuting		
BIT enhanced policy on ICT Sustainability	All sites	Raise awareness, reduce ICT emissions		

[20] Commission Decision (EU) 2019/61 of 19 December 2018.

[21] It is expected to reduce energy consumption and GHG emissions by a factor of 10 compared with the former building.

Action	Site	Benefits	Status	Impact
New eco-Design framework for IT developments	All sites	Reduce ICT emissions		
Catalogue office supplies: 90% green articles	All sites	Promote sustainable procurement		
Updated sustainability pages on EPO.org	n/a	Raise awareness		
Environmental Communications Campaigns on: ▪ International Day of Clean Energy ▪ Digital Clean Up Day ▪ World Water Day / Earth Hour ▪ UN Zero-Waste Day ▪ Earth Day ▪ World Bicycle Day ▪ World Environment Day ▪ EU Mobility Week	All sites	Raise awareness and promote internal knowledge		
Environmental sessions at Campus Days, including Climate Fresks	Munich, The Hague	Raise awareness and promote internal knowledge		
Toys and satchels collection	Munich	Promote reuse and reduce waste		
Extend carbon footprint calculation to further material scope 3 categories (purchased goods and services)	All sites	Improve quality of reported carbon footprint		
Develop a high-level plan for carbon neutral buildings by 2030	All sites	Reduce energy consumption and related emissions		

6.2 Initiatives planned for 2026-2028

Action	Site	Benefits	Status	Impact
Upgraded meeting facilities (new Conference Centre)	The Hague	Reduce energy consumption and related emissions		
Create e-learning module on EcoDesign	All sites	Raise awareness, reduce ICT emissions		
Awareness event on digital ecoTips	All sites	Raise awareness, reduce ICT emissions		
Installation of solar panels	Munich Isar Munich PH	Reduce purchased energy		

Action	Site	Benefits	Status	Impact
		consumption		
Installation of LED lighting in PH 7-8	Munich PH	Reduce energy consumption and related emissions		
Second internal facade	Munich Isar	Reduce energy consumption and related emissions		
Deconstruction of Shell building	The Hague	Reduce energy consumption and related emissions		
Renovation of Hinge building (including installation of solar panels)	The Hague	Reduce energy consumption and related emissions		
Kitchen renovation	Munich Isar	Reduce energy consumption and related emissions		
Extend carbon footprint calculation to scope 3 category downstream leased assets)	All sites	Improve quality of reported carbon footprint		
Updated sustainability page on the EPO intranet	All sites	Raise awareness		
Environmental Communications Campaigns on: ▪ International Day of Clean Energy ▪ Digital Clean Up Day ▪ World Water Day / Earth Hour ▪ UN Zero-Waste Day ▪ Earth Day ▪ World Bicycle Day ▪ World Environment Day ▪ EU Mobility Week	All sites	Raise awareness and promote internal knowledge		
Environmental sessions at Campus Days (e.g., Climate Fresks)	Munich, The Hague	Raise awareness and promote internal knowledge		
Roll-out of ecoDesign framework	All sites	Reduce ICT emissions		
Toys and satchels collection	Munich	Promote reuse and reduce waste		

Annex 1 Methodology

Greenhouse gas emissions are calculated in accordance with the requirements of the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard and the Corporate Value Chain (scope 3) Standard. The sources of activity data and the emission factors used for the calculation are shown in the table below.

Table 8 – Conversion factors for GHG emission sources

Emission source	Source of activity data	Source of emission factor
Energy		
Natural gas (Berlin)	Data provided by landlord	Umweltbundesamt Deutschland, 03/2025, Emissionsbilanz erneuerbarer Energieträger, Bestimmung der vermiedenen Emissionen im Jahr 2023
Biomethane (The Hague)	Invoices, meter readings (if invoices are not available)	Direct emissions: Factor for natural gas (The Hague) due to comparable chemical composition; CO_2 reported under biogenic, CH_4 and N_2O reported in scope 1
		Milieu Centraal, Stimular, SKAO, Connekt, Rijksoverheid, CO_2emissiefactoren 2025
Heating oil (Munich)	Runtimes and refuelling quantities of emergency generators	Umweltbundesamt Deutschland, 11/2026, Emissionsbilanz erneuerbarer Energieträger, Bestimmung der vermiedenen Emissionen im Jahr 2024
Diesel, petrol (Munich)	Fuelling records of cars	Umweltbundesamt, 2025, Liste mit Emissionsfaktoren für die Treibhausgasbilanzierung von Organisationen V2.0
Diesel, petrol (The Hague)	Fuelling records of cars, runtimes and refuelling quantities of emergency generators	Milieu Centraal, Stimular, SKAO, Connekt, Rijksoverheid, CO_2emissiefactoren 2025
District heating (Munich, Vienna)	Invoices, meter readings (if invoices are not available) Rented site Vienna: calculated based on average consumption per m^2	Certificate from energy provider
District heating (Berlin)	Data provided by landlord	Certificate from energy provider
Electricity (100% renewable) Munich	Invoices, meter readings (if invoices are not available)	Scope 2 market-based: electricity provider
		Scope 2 location-based: Umweltbundesamt Deutschland, 13/2025, Entwicklung der spezifischen Treibhausgas-Emissionen des deutschen Strommix in den Jahren 1990 – 2024
		Scope 3: Study "The inventory and life cycle data for Norwegian hydroelectricity" (2020), M. Silva & I. Saur Modahl, Ostfold Research
Electricity (100% renewable) The Hague	Invoices, meter readings (if invoices are not available)	Scope 2 market-based: electricity provider
		Scope 2 location-based, scope 3: Milieu Centraal, Stimular, SKAO, Connekt, Rijksoverheid, CO_2emissiefactoren 2024
Electricity (100%	Owned building: invoices,	Scope 2 market-based: energy provider

Emission source	Source of activity data	Source of emission factor
renewable) Vienna	meter readings (if invoices are not available) Rented space: calculated based on average consumption per m^2	Scope 2 location-based: Umweltbundesamt Österreich, 2024, Harmonisierte österreichische direkte und indirekte THG-Emissionsfaktoren für relevante Energieträger & Technologien
		Scope 3: Study "The inventory and life cycle data for Norwegian hydroelectricity" (2020), M. Silva & I. Saur Modahl, Ostfold Research
Electricity (100% renewable) Berlin	Invoices	Scope 2 market-based: electricity provider
		Scope 2 location-based, scope 3: Umweltbundesamt Deutschland, 13/2025, Entwicklung der spezifischen Treibhausgas-Emissionen des deutschen Strommix in den Jahren 1990 - 2024
Cooling agents		
Fluorinated gases	Maintenance logs	Umweltbundesamt Deutschland, 2024, Treibhauspotentiale (Global Warming Potential, GWP) ausgewählter Verbindungen und deren Gemische gemäß Viertem (AR4) und Fünftem (AR5) IPCC Sachstandsbericht sowie Verordnung (EU) 2024/573 (F-Gas-VO) bezogen auf einen Zeitraum von 100 Jahren; used GWP_{100} according to EU F-Gas Regulation
Upstream transportation and distribution		
Transport of letters and parcels	Internally registered amount	Emissions calculated by service providers, average factor per letter/parcel from International Post Corporation (if emissions from service providers are not available)
Waste		
Different waste categories (incl. wastewater)	Invoices from disposal companies (Munich, The Hague), waste amount calculated based on volume of containers and number of collections (Berlin, Vienna)	UK Government GHG Conversion Factors for Company Reporting 2025
Business travel		
Air	Business travel requests	Flights booked until April 2025: American Express Global Business Travel Flights booked as of May 2025: Westtours-Reisen GmbH
Rail	Duty travel requests	UK Government GHG Conversion Factors for Company Reporting 2025
Taxi	Duty travel requests	European Environment Agency, 2024, CO2 emissions performance of new passenger cars in Europe
Public transport	Duty travel requests	UK Government GHG Conversion Factors for Company Reporting 2025

Emission source	Source of activity data	Source of emission factor
Private cars	Duty travel requests (flight is taken as means of transport when distance is more than 500 km)	European Environment Agency, 2024, CO_2 emissions performance of new passenger cars in Europe
Employee commuting		
Car	Estimates on km travelled per mode of transport based on: ▪ Average commuting distance per site ▪ Data on building occupancy and number of employee cars using our parking spaces ▪ Expert estimates on commuting patterns per site (e.g., means of transport)	European Environment Agency, 2024, CO_2 emissions performance of new passenger cars in Europe
Public transport		- Germany: Umweltbundesamt, TREMOD 6.71B (10/2025) - The Netherlands: Milieu Centraal, Stimular, SKAO, Connekt, Rijksoverheid, CO_2emissiefactoren 2025 - Austria: Emissionskennzahlen 2025 - Bundesministerium Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie
Bike or walking		No emission calculation
Teleworking		
Electricity (Germany)	Average estimated electricity consumption per employee based on: ▪ working days per year ▪ hours worked per day ▪ percentage of teleworking per year ▪ IT equipment power[22] ▪ light power	Umweltbundesamt Deutschland, 13/2025, Entwicklung der spezifischen Treibhausgas-Emissionen des deutschen Strommix in den Jahren 1990 - 2024
Electricity (Netherlands)		Milieu Centraal, Stimular, SKAO, Connekt, Rijksoverheid, CO_2emissiefactoren 2024
Electricity (Austria)		Umweltbundesamt Österreich, 2024, Harmonisierte österreichische direkte und indirekte THG-Emissionsfaktoren für relevante Energieträger & Technologien
Data transmission	Average emissions per working hour	Umweltbundesamt Deutschland, 2020, Energie- und Ressourceneffizienz digitaler Infrastrukturen Ergebnisse des Forschungsprojektes "Green Cloud-Computing"
Heating energy mix (Germany, Netherlands, Austria)	Average heating energy consumption per employee based on: ▪ average heating energy consumption per m^2 in Germany[23] ▪ estimated size of working area ▪ estimated additional heating energy consumption due to teleworking (%)	GEMIS 5.1, factors for national heating energy mixes

[22] IT equipment refers to 38" screen, PC, iPad, webcam, headset, wireless keyboard, network, router.

[23] Germany heating consumption per m^2 applied to all sites.

Key environmental data has been presented with real-life examples to facilitate the understanding of our impact. The conversion factors are presented below.

Table 9 – Conversion factors for real-life examples

Comparative base	Real-life comparative	Source of conversion factor
Carbon footprint	Average electricity usage per household in Germany	De Statis, Statistisches Bundesamt, Environmental Economic Accounting, Electricity Consumption of household by household size 2021
	Electricity emission factor – Germany	Umweltbundesamt Deutschland, 13/2025, Entwicklung der spezifischen Treibhausgas-Emissionen des deutschen Strommix in den Jahren 1990 - 2024
Energy consumption	Average energy usage per person in The Netherlands	Eurostat, Energy statistics – quantities, annual data, Energy indicators, "Available energy, energy supply and final energy consumption per capita"
	Average number of people per household in The Netherlands	Eurostat, Household composition statistics
Water	Volume of water in an Olympic swimming pool	Wikipedia, "Olympic-size swimming pool"
Printed paper	Paper sheet A4 (80gr/m^2)	Zxprinter, Blog, The Thickness of Printing Paper List
	La Torre de Cristal	Skyscrapercenter, Spain, Europe, Overview

Annex 2 Evaluation of environmental aspects

To help assess their relevance and the need for action, the different direct and indirect environmental aspects have been rated as follows:
A = very significant environmental aspect with above-average need for action
B = significant environmental aspect with average need for action
C = less significant environmental aspect with low need for action

In addition, the extent to which they can be influenced is indicated by the following ratings:
I = short-term control possible
II = mid to long-term control possible
III = control not possible or possible only in the long term or subject to third-party decisions

With regard to the assessment of indirect aspects, there is no differentiation between the sites (Figure 4). All direct environmental aspects under the EMAS III Regulation were assessed according to their relevance for the EPO and only those found to be relevant are included below, differentiated by site.

Environmental aspect and impact		Berlin	Brussels	MUC Isar	MUC PH	The Hague	Vienna
Electricity: resource consumption	General power	A II	C III	A II	A II	A II	B II
	Data centre	–	–	C III	B II	C III	C III
	Garages	–	–	B I	A I	B II	C I
	HVAC	–	–	B I	A I	A II	B II
	Canteen	–	–	A III	A III	A III	C II
Electricity: GHG emissions		B III	C III	B III	B III	B III	B III
Heating energy: resource consumption and related GHG emissions	District heating	B II	–	A II	A II	–	–
	Natural gas / biomethane	–	C III	–	–	B II	–
	Diesel / Heating oil	–	–	–	–	–	–
	Electricity consumption of heat pumps	–	–	–	–	A II	B II
Fuel consumption: resource consumption and related GHG emissions	Vehicle fleet	–	–	C I	–	C I	–
	Emergency generator	–	–	C III	C III	C III	–

Environmental aspect and impact		Berlin	Brussels	MUC Isar	MUC PH	The Hague	Vienna
Direct emissions from refrigerants: GHG emissions contributing to global warming		–	–	A II	A II	A II	B II
Freshwater: resource consumption	Sanitary facilities and canteen	C II	C III	B II	B II	B II	C II
	Technical facilities and cooling	–	–	B II	B II	B II	–
Wastewater: energy and resource consumption for water treatment, risk of water pollution		C II	C III	B II	B II	B II	B II
Waste − non-hazardous: resource and energy consumption for waste treatment		C II	C III	C II	C II	C II	C II
Waste − hazardous: resource and energy consumption for waste treatment; emissions from waste combustion, risk of environmental pollution		C III	–	B II	B II	B II	C II
Paper: resource and energy consumption for paper production		C II	C III	B II	B II	B II	C II
Risk of environmental accidents: pollution of ground water		C II	–	B II	B II	B II	B II
Impacts on biodiversity: sealing of soils for construction purposes		C III	–	C II	C II	C II	C II

Annex 3 Tables on environmental performance

Table 2 – Total energy input (MWh per year) [24]

		2023	2024	2025	Change 2024-25 in %
Mains electricity	Berlin	306	276	50	-82
	MUC Isar	5 633	5 444	4 940	-9
	MUC PH	7 536	7 092	6 912	-3
	The Hague	11 917	9 727	7 730	-21
	Vienna[25]	57	179	489	+273
Electricity from solar panels	The Hague	50	62	44	-30
	Vienna	-	7	140	+1 901
Total electricity		**25 499**	**22 787**	**20 305**	**-11**
District heating	MUC Isar	6 154	5 600	5 329	-5
	MUC PH	7 373	7 144	7 749	+8
	Vienna − rented space[26]	95	79	-	-
Total district heating		**13 622**	**12 823**	**13 078**	**+2**
Biomethane	The Hague	5 113	2 164	1 285	-41
Natural gas	Berlin[27]	1 455	1 527	794	-48
Heating oil	MUC Isar	3	3	4	+34
	MUC PH	21	24	29	+25
Diesel	MUC Isar	17	14	15	+7
	The Hague	46	43	38	-12
Petrol	The Hague	20	0	-	-
All inputs	**EPO total**	**45 795**	**39 386**	**35 548**	**-10**

[24] Totals or percentage changes may not reflect the displayed data because of rounding.
[25] Vienna rented space until October 2024, Vienna own premises as of November 2024.
[26] No data from landlord available. Figure estimated based on average mean annual heat energy per square metre in office buildings in Austria (two months in 2022, ten months in 2024).
[27] Vis-à-vis last year's report, the 2024 consumption has been updated with the landlord's figures. For 2025, consumption is estimated because data was not available at the time of compiling of this report.

Table 3 − Water consumption (m^3 per year)

	2023	2024	2025	Change 2024-25 in %
Berlin	1 325	1 325	1 325	-
MUC Isar	18 428	18 740	17 645	-6
MUC PH	33 229	28 667	29 592	+3
The Hague	22 367	23 830	26 045	+9
Vienna[28]	515[29]	868	2 965	+242
Total	**75 864**	**73 430**	**77 573**	**+6**

[28] Vienna rented space until October 2024, Vienna own premises as of November 2024.
[29] For the rented space, no data from landlord is available. Related water consumption for 2023 and 2024 estimated based on water consumption per employee at the owned site before the renovation.

Table 4 – Total waste generated in operations (t per year) [30]

	2023	2024	2025	2024-25 change in %
Residual waste				
Berlin[31]	40	40	40	-
MUC Isar	19	19	25	+27
MUC PH	53	38	52	+35
The Hague	70	55	24	-57
Vienna[32]	4	6	11	+98
Total	**186**	**158**	**151**	**-5**
Paper waste				
Berlin	18	10	-	-
MUC Isar	142	79	91	+15
MUC PH	184	31	44	+40
The Hague	126	37	13	-64
Vienna[21]	1	3	5	+116
Total	**471**	**160**	**154**	**-4**
Plastics				
Berlin	4.7	4.7	-	-
MUC Isar	2.3	3.2	2.2	-32
MUC PH	6.4	8.4	7.2	-14
The Hague	4.6	4.5	-	-
Total	**18**	**21**	**9**	**-55**
Food waste				
MUC Isar	18	19	19	-
MUC PH	37	35	33	-7
The Hague	23	25	27	+9
Total	**78**	**80**	**80**	**-**
Grease separator waste				
MUC Isar	106	194	216	+11
MUC PH	22	55	57	+4
The Hague	41	14	-	-
Total	**170**	**263**	**273**	**+4**
Hazardous waste				
Berlin		4		
MUC Isar	13	13	4	-71
MUC PH	20	7	23	+237
The Hague	32	45	6	-87
Total[33]	**64**	**67**	**32**	**-52**

[30] Totals or percentage changes may not reflect the displayed data because of rounding.
[31] In Berlin, residual waste and plastics/packaging waste are calculated based on the containers' volume and the number of collections by the disposal companies.
[32] Vienna rented space until October 2024, Vienna own premises as of November 2024. In Vienna, plastic waste is not collected separately and is included in the residual waste figures

Table 5 – GHG emissions from business travel (kg CO_2e)

	2023	2024	2025	Change 2024-25 in %
Flights	122 308	134 962	341 004	153
Rail	1 051	867	967	12
Public transport	1 007	1 296	1 692	31
Taxi	1 368	1 991	2 169	9
Private cars	4 404	4 879	8 421	73
Total	**130 138**	**143 995**	**354 254**	**146**

[33] The 2023 and 2024 figures differ from the previous report due to a correction to the 2023 data and updated 2024 consumption figures provided by the Berlin landlord.

Annex 4 Overview per site

The following sections contain a detailed overview of our EMAS-certified sites. For each site, we present environmentally relevant facilities and legal aspects, and the core indicators for environmental performance.

1. Munich

Munich is the largest of our sites in terms of gross floor area and staff numbers. The condition of the buildings varies, with some being relatively old, such as the Isar building (opened in 1980), and others newer, namely PschorrHöfe 7 (2005) and 8 (2008). The Isar building and the PschorrHöfe buildings have district heating. Other facilities of environmental relevance are primarily situated in the Isar building. They include a repair shop and carpenter's workshop, as well as a water treatment installation.

GHG emissions (scope 1 and 2) in 2025:
1 105 t CO_2e

+29%
compared with 2024

The Isar building and PschorrHöfe 1-8 have an oil and/or grease trap and a kitchen/canteen and dishwashing area. All Munich buildings have storage areas for cleaning agents and chemicals. There is no information to suggest any land contamination at the Munich sites.

PschorrHöfe 5-7 were emptied by Q4 2023 following the rationalisation of office space after the implementation of the NWoW scheme. PschorrHöfe 5-6 are being renovated within the scope of the BIP.

Figure 17 – EPO Munich, Isar building

Source: EPO

Figure 18 – EPO Munich, PschorrHöfe complex

Source: EPO

Table 10 − Environmental law and relevant facilities, EPO Munich

Most relevant areas of environmental law	Relevant facilities/activities
Building energy efficiency regulations	Energy certification, building insulation, energy-efficient technologies, criteria for renovation/rebuilding and new buildings
Water regulations	Storage of heating oil, operation of grease traps, cooling and wastewater discharge into sewage system
Waste regulations	Recycling/separation/disposal of various types of waste, handling of hazardous waste (spent batteries, old fluorescent tubes and waste oil)
Pollution regulations governing small and medium-sized combustion systems	Emergency generators
Regulations on climate protection and refrigerants	Cooling installations with GWP of at least 5 t CO_2e, performance of density checks
Health and safety	Appropriate risk assessment, fire prevention, restrictions on certain chemical agents, availability of safety information sheets and operating instructions

EPO Munich – Isar building

Address	Bob-van-Benthem-Platz 1, 80469 Munich, Germany			
Status	Owned by EPO			
Reference values	**Unit**	**2023**	**2024**	**2025**
Gross floor area	m^2	91 346	91 346	91 346
Heated floor area[34]	m^2	67 847	67 847	68 288
Built surface area (sealed)	m^2	18 113	18 113	18 113
Nature-oriented area on-site	m^2	10 579	10 579	10 579
Number of employees[35]	empl	1 000	1 013	1 003
Emissions				
GHG emissions (scopes 1 and 2)	t CO_2e/empl	0.41	0.37	0.62
SO_2 (fuels)	g/empl	0.70	1.18	1.54
NO_x (fuels)	g/empl	13.62	11.84	13.54
Particulates (fuels)	g/empl	0.15	0.15	0.18
Energy and water consumption				
Electricity consumption	kWh/empl	5 633	5 374	4 926
Heat energy consumption (district heating)	kWh/m^2	91	83	78
Renewable energy as a percentage of total consumption (electricity and heat)	%	59	62	61
Heating oil consumption[36]	kWh	2 515	2 982	3 986
Diesel consumption	kWh	16 536	13 668	14 596
Water consumption	m^3/empl	18.43	18.50	17.59
Waste generated in operations				
Residual waste	kg/empl	18.87	19.16	24.62
Paper/cardboard	kg/empl	141.62	78.45	91.16
Plastics	kg/empl	2.30	3.12	2.15
Food waste	kg/empl	18.00	19.19	19.38
Grease trap residues	kg/empl	106.40	191.31	215.00
Hazardous waste	kg/empl	12.57	12.35	3.60

[34] Updated in 2025 following change in methodology.
[35] Figures aligned with the Social Report 2025. This affects all employees related KPIs.
[36] Reported under diesel oil consumption in previous years.

EPO Munich – PschorrHöfe 1-8

Address	Bayerstr. 34, 80335 Munich, Germany			
Status	Owned by EPO			
Reference values	**Unit**	**2023**	**2024**	**2025**
Gross floor area	m^2	276 180	276 180	276 180
Heated floor area[37]	m^2	178 320	178 320	178 700
Built surface area (sealed)	m^2	42 641	42 641	42 641
Total nature-oriented area on site	m^2	18 422	18 422	18 422
Number of employees	empl	2 331	2 305	2 243
Emissions				
Greenhouse gases (scopes 1 and 2)	t CO_2e/empl	0.39	0.21	0.22
SO_2 (fuels)	g/empl	1.81	3.45	4.44
NO_x (fuels)	g/empl	4.88	4.92	6.33
Particulates (fuels)	g/empl	0.09	0.11	0.14
Energy and water consumption				
Electricity consumption	kWh/empl	3 233	3 077	3 081
Heat energy consumption (district heating)	kWh/m^2	41	40	43
Renewable energy as a percentage of total energy consumption	%	61	62	61
Heating oil consumption	kWh	21 063	23 518	29 452
Water consumption	m^3/empl	14.26	12.44	13.19
Waste generated in operations				
Residual waste	kg/empl	22.82	16.57	23.04
Paper/cardboard	kg/empl	79.07	13.66	19.67
Plastics	kg/empl	2.75	3.62	3.21
Food waste	kg/empl	15.92	15.33	14.81
Grease trap residues	kg/empl	9.58	23.86	25.41
Hazardous waste	kg/empl	8.66	2.93	10.13

[37] Updated in 2025 following change in methodology.

2. The Hague

The Hague is our second-largest site after Munich. The Main building is partly heated and cooled by groundwater heat pumps and additionally heated by biomethane. There is no information to suggest any land contamination at the site in The Hague. Under Dutch law, the site in The Hague is subject to an "activity decree", a simplified environmental permit.

GHG emissions (scope 1 and 2) in 2025:
11 t CO_2e

- 14%
compared with 2024

Construction work on the Main and Hinge buildings in The Hague was completed in the summer of 2018. The buildings were constructed based on high sustainability standards, such as minimising the environmental impact in the construction phase, significantly reduced energy consumption, optimal and particularly user-friendly air conditioning. The EPO has chosen to comply with the certification criteria of multiple standards for sustainable buildings (Dutch Bouwbesluit Building Decree 2012, BREEAM[38]) and to aim for an energy efficiency rating of 20% above the requirements laid down in the 2012 Dutch building regulations. In the long term, 15% of the energy required for building operation is expected to be generated on-site, from groundwater heat and solar power, for example.

The Shell building was emptied by Q4 2023 following the rationalisation of office space after the implementation of the NWoW scheme and its deconstruction will be completed by 2028.

Figure 19 – EPO The Hague, New Main building

Source: EPO

[38] BREEAM (Building Research Establishment Environmental Assessment Method) is a leading method for master planning projects, infrastructure and buildings. It recognises and reflects the value of higher-performing assets across the built environment lifecycle, from new construction to in-use refurbishment.

Table 11 – Environmental law and relevant facilities, EPO The Hague

Most relevant areas of environmental law	Relevant facilities/activities
Rules on general environmental management	Environmental permit, annual environmental report to the municipality of Rijswijk
Building regulations	Building activities: criteria for renovation/rebuilding and new buildings
Water regulations	Water discharge into sewage system
Waste regulations	Recycling/separation/disposal of various types of waste, handling of hazardous waste (spent batteries, old fluorescent tubes and waste oil)
Pollution regulations governing combustion units of type B	Heating system (biomethane), checked to comply with emission thresholds
Regulations on climate protection and refrigerants	Cooling installations with GWP of at least 5 t CO_2e, performance of density checks
Hazardous materials regulations	Handling/storage/transport of hazardous substances; transmission of hazardous waste (potential); grease traps, cleaning agents
Regulations on underground storage of hazardous substances	Underground storage area for diesel fuel (emergency generators)
Health and safety	Appropriate risk assessment, fire prevention, restrictions on certain chemical agents, availability of safety information sheets and operating instructions

EPO The Hague				
Address	Patentlaan 2, 2288 EE Rijswijk, Netherlands			
Status	Owned by EPO			
Reference values	**Unit**	**2023**	**2024**	**2025**
Gross floor area[39]	m²	217 465	217 465	218 770
Heated floor area	m²	159 884	159 884	159 884
Built surface area (sealed)	m^2	51 196	51 196	51 196
Total nature-oriented area on site	m^2	43 018	43 018	43 018
Number of employees	empl	2 442	2 441	2 461
Emissions				
Greenhouse gases (scopes 1 and 2)	t CO_2e/empl	0.25	0.01	0.00
SO_2 (fuels, natural gas, biomethane)	g/empl	6.28	1.56	1.71
NO_x (fuels, natural gas, biomethane)	g/empl	123.85	56.74	34.41
Particulates (fuels, natural gas, biomethane)	g/empl	2.18	0.97	0.58
Energy and water consumption				
Electricity consumption	kWh/empl	4 900	4 011	3 159
Heat energy consumption (biomethane)	kWh/m^2	32	14	8
Renewable energy as a percentage of total energy consumption	%	100	100	100
Diesel consumption	kWh	45 861	43 317	38 081
Petrol consumption	kWh	19 858	396	0
Water consumption	m^3/empl	9.16	9.76	10.58
Waste generated in operations				
Residual waste	kg/empl	28.67	22.59	9.64
Paper/cardboard	kg/empl	51.49	15.01	5.37
Plastics	kg/empl	1.90	1.85	0.00
Food waste	kg/empl	9.29	10.18	10.98
Grease trap residues	kg/empl	16.76	5.91	0.00
Hazardous waste	kg/empl	12.92	18.23	2.33

[39] Updated in 2025 following change in methodology.

3. Vienna

Vienna is the smallest of all EMAS-certified sites, in terms of both gross floor area and staff numbers. The site renovation project was completed according to plan and staff returned to the premises in November 2024. Accordingly, 2025 was the first full year of operation after the completion of project.

GHG emissions (scope 1 and 2) in 2025:
0 t CO_2e

- 100%
compared with 2022 (before renovation)

Following the renovation of the building, district heating is no longer in use. Facilities of environmental relevance are limited to a small storage area for cleaning agents.

The heat pumps use ammonia (NH_3), a cooling agent which does not contribute to ozone depletion and has no global warming potential (GWP). However, it is classified as a substance hazardous to water, so preventive measures, such as regular leakage inspections are undertaken, while an appropriate location for the pumps was selected.

Thanks to the constant attention given to improving the environmental performance, the Office has made substantial progress towards achieving the expected benefits. These efforts need to continue in the coming years and an update on the benefits realisation will be provided in the next report.

There is no information to suggest any land contamination at the Vienna site.

The space currently occupied has proven more than sufficient to meet our operational needs. As part of our ongoing commitment to financial and environmental sustainability, we are now renting out a part of our building to ensure that empty floors are actively utilised, and resources are managed efficiently.

The FRA (EU Agency for Fundamental Rights) will occupy the first and second floor and access our canteen and meeting rooms under the same conditions as our staff. The agency plans to move in during the first half of 2026.

Figure 21 – EPO Vienna

Source: EPO

Table 13 – Environmental law and relevant facilities, EPO Vienna

Most relevant areas of environmental law	Relevant facilities/activities
Building energy efficiency regulations	Energy certification, building insulation, energy-efficient technologies
Water regulations	Water discharge into sewage system
Waste regulations	Recycling/separation/disposal of various types of waste
Health and safety	Appropriate risk assessment, fire prevention, restrictions on certain chemical agents, availability of safety information sheets and operating instructions

EPO Vienna

Address	Rennweg 12, 1030 Vienna, Austria			
Status	Owned by EPO			
Reference values[40]	**Unit**	**2023[41]**	**2024**	**2025**
Gross floor area	m^2	-	13 232	13 232
Heated floor area	m^2	-	7 973	7 973
Built surface area (sealed)	m^2	-	2 547	2 547
Total nature-oriented area on site	m^2	-	1 966	1 966
Number of employees	empl	-	75	73
Emissions				
Greenhouse gases (scopes 1 and 2)	t CO_2e/empl	-	0.00	0.00
SO_2 (fuels)	g/empl	-	0.00	0.00
NO_x (fuels)	g/empl	-	0.00	0.00
Particulates (fuels)	g/empl	-	0.00	0.00
Energy and water consumption				
Electricity consumption[42]	kWh/empl	-	1 842	8 623
Heat energy consumption (district heating)[43]	kWh/m^2	-	-	-
Renewable energy as a percentage of total energy consumption	%	-	100	100
Water consumption	m^3/empl	-	5.85	40.62
Waste generated in operations				
Residual waste	kg/empl	-	26.67	149.39
Paper/card	kg/empl	-	20.00	73.97
Plastics[44]	kg/empl	-	N/A	-
Food waste[45]	kg/empl	-	N/A	-
Hazardous waste	kg/empl	-	N/A	5.81

[40] The reference values are indicated for the owned office in Vienna.
[41] In 2023, the building was under renovation.
[42] 2024 value only for November and December, includes heating pump consumption
[43] No more district heating in Vienna following the renovation project.
[44] Plastic waste is not collected separately in Vienna and is included in the residual waste figures.
[45] Disposal handled by canteen service provider.

Annex 5 Environmental management system

Our environmental management system (EMS) according to EMAS has been implemented to integrate environmental aspects into all operational processes and identify potential improvements in environmental protection.

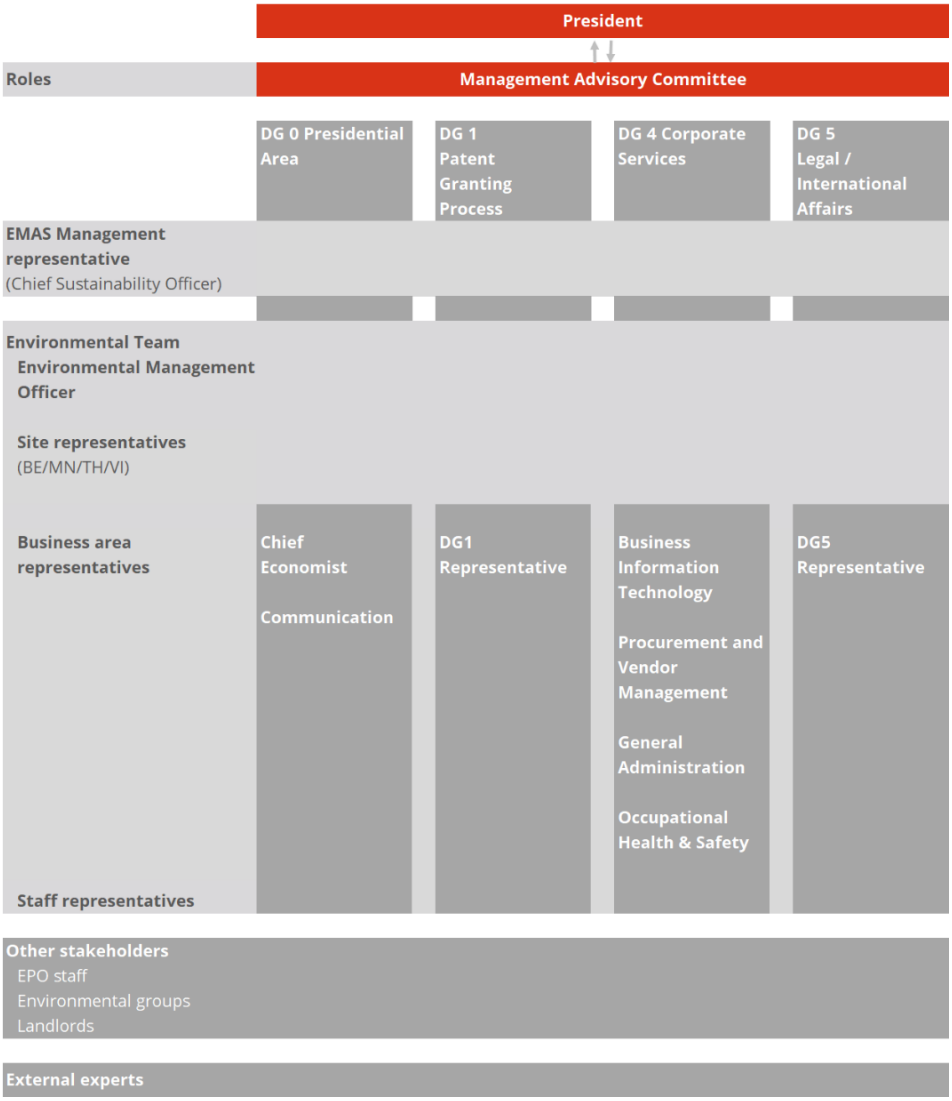
4. Structure and responsibilities

The structure of our EMS is set out in our environmental management documentation, which applies to all sites. We regularly evaluate our environmental context to identify relevant stakeholders and their expectations regarding the environmental management system. The EMS is regularly assessed in internal audits, thus ensuring a continuous improvement process. Staff are encouraged to adopt environmentally friendly behaviour. Relevant information is communicated to staff via info screens in the office buildings and the intranet and is made available to the public in the Environmental Report.

The Chief Sustainability Officer acts as EMAS Management Representative and is responsible for implementing and further developing the EMS with the support of the Environmental Management Officer (EMO). Site representatives monitor local activities with environmental impact (e.g., waste management) and ensure that environmental aspects are integrated into everyday operations at each site.

Together with business area representatives, the EMO and the site representatives form the EPO's environmental team. The business area representatives are tasked with integrating environmental aspects in their respective departments, thereby strengthening the organisation-wide implementation of EMAS. Voluntary environmental groups initiated by staff support the team's work by submitting proposals to the environmental programme.

Figure 22 – EMS governance structure



Source: EPO

5. Compliance with binding obligations

EMAS and the environmental laws applying to the different EPO sites constitute external requirements to be met by the EPO and its EMS. The legal requirements and other binding obligations relevant for each place of employment have been identified. The most relevant environmental regulations for each place of employment are set out in the previous section. All binding obligations are documented in the legal register for each country in which the EPO is located. By continuously reviewing and updating the legal register, we identify changes to environmental law and implement new requirements. Moreover, all recurrent obligations at the different sites are documented in local registers. Compliance with legal requirements is verified by annual internal audits. No non-compliances were detected.