



Belfius Thematic Strategies Transparency Code



Statement of Engagement

Sustainable & Responsible Investment is an essential part of the strategic positioning and behaviour of the Management Company, Belfius Asset Management and the Investment Manager, Candriam. Belfius Asset Management (Belfius AM) and Candriam have been involved in SRI since 2019 and 1996.

Belfius Asset Management and Candriam are committed to transparency, and we believe that we are as transparent as possible given the regulatory and competitive environments that exist in the countries in which we operate.

The Transparency Codes are available on our respective corporate websites:

Belfius Asset Management

SRI Publications | Belfius

Candriam

SRI Publications | Candriam

August 2024





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1. List of Funds Covered by the Code

Dominant/preferred SRI strategy	Asset Class	Exclusions standards and norms**	Labels
 □ Best in Class □ Best in Universe* □ Engagement & Voting □ ESG Integration □ Exclusion □ Impact investing □ Norms-based Screening □ Sustainability Themed 	Passively managed Passive investing – core benchmark: specify the index tracking Passive investing –ESG/SRI benchmark: specify the index tracking Actively managed Shares in a euro area country Shares in an EU country International Shares Bonds and other debt securities denominated in euro International bonds and other debt securities Monetary assets Short-term assets Structured funds	 Controversial weapons Alcohol Tobacco Arms Nuclear power Human rights Labour rights Gambling Pornography Animal testing Conflict minerals Biodiversity Deforestation CO2 intensive (including coal) Genetic engineering Global Compact OECD Guidelines for MNCs ILO Conventions Other (please specify) Oppressive Regimes Unconventional & conventional oil & gas Palm oil 	 □ French SRI label □ French TEEC label □ French CIES label □ Luxflag Label □ FNG Label □ Austrian Ecolabel ⊠ Other (please specify) <i>Towards Sustainability (BE)***</i>

* The following funds apply a Best In Universe philosophy: Belfius Equities Become, Belfius Equities Climate, Belfius Equities Water=Well, Belfius Equities Cure, Belfius Equities Innov=Eat, Belfius Equities Move, Belfius Equities Re=New, Belfius Equities Wo=Men

** Please note that the strategies follow distinct Exclusion policies as outlined in section 3.5. The table above highlights the exclusions relevant to our SRI Level 3 Exclusions.

*** The following funds have been awarded the Towards Sustainability label (BE): Belfius Equities Climate, Belfius Equities Be=Long, Belfius Equities Cure, Belfius Equities Wo=Men



2. General information about the fund management company

2.1. Name of the fund management company that manages the applicant fund(s)

The Management Company of the fund is:

Belfius Asset Management Place Rogier, 11 1210 Bruxelles

Belfius AM is the Asset Management competence center for Belfius Group.

The investment management company that manages the applicant fund is the following:

Candriam Belgian Branch Avenue des Arts, 58 1000 Brussels – Belgium

Please consult our website for further information: <u>www.candriam.com</u>. This code applies to the strategy classified as Article 8 according to the "Sustainable Finance Disclosure Regulation" (SFDR) and managed by Candriam.

Any question regarding sustainable and responsible investment (SRI) at Candriam can be e-mailed to the following address: <u>Contact | Candriam</u>.

2.2. What are the company's track record and principles when it comes to integrating SRI into its processes?

Management Company - Belfius Asset Management

Sustainable development is at the heart of the investment approach of Belfius Asset Management (and more generally of the Belfius Group).

Responsible investment is an investment strategy and practice that incorporates Environmental, Social and Governance (ESG) factors in investment decisions and active ownership.

Belfius Asset Management has adopted an investment process in which fundamental analysis is combined with environmental, social responsibility and governance factors that are gradually further integrated.

The signature on 28th February 2019 of the UN Principles for Responsible Investment (UN PRI) is one of the first commitments taken by Belfius Asset Management towards this progressive introduction of a specific and gradual attention to ESG in the development of (sustainable) investment solutions.

For more information, please refer to the website Responsible Investments | Belfius Asset Management.

Investment Management Company – Candriam

Sustainability is rooted in Candriam's operating model and forms a key part of our corporate culture. Our sustainable development strategy leads us to incorporate the overall trends that will shape the world of tomorrow when defining our strategic operational choices. This strategy aims to establish and maintain a balance between, on the one hand, responsible behaviour towards all stakeholders and, on the other, (a) the synergies between our SRI and traditional investment activities, and (b) the determination to run the company in consideration of the Environment and of Society.

Candriam has been managing Sustainable Investments since 1996. As a responsible asset manager for over two decades, we are committed to the continuous development of our long-standing and holistic Environmental, Social, and Governance analysis approaches, and to the on-going expansion of our ESG integration process towards our large range of investment products.



As a sustainable asset manager, Candriam recognises the importance of taking into account sustainability risks and opportunities in the portfolios it manages and to duly consider sustainability impacts.

Milestones in Candriam's Environmental, Social, and Governance Investing:

1996 – First Sustainable Equity Fund. In 1996, Candriam's predecessor company, Cordius Asset Management, offered investors our first Sustainable Equity Fund.

2003 – Structured Proxy Voting System Established. Candriam was a pioneer among Belgian investment managers in exercising the voting rights of its clients to improve investment returns. In 2003 we began a systematic and structured proxy voting effort.

2005 – Proprietary Environmental, Social, and Governance research. In 2005, Candriam launched its in-house ESG analysis. Our ESG approach is based on a sophisticated set of ESG factors and performance indicators in six stakeholder domains, which is Investors, Employees, Environment, Suppliers, Customers, and Society, and are the core of Candriam's approach to Sustainable and Responsible investing.

2005 – Engagement Embedded in the Research Process. Our Engagement activities began at the outset of our in-house ESG research in 2005. Engagement arose from our dialogues with companies to obtain additional information. Our direct engagement with companies has grown organically over the years; for Candriam, Dialogue is synonymous with ESG Research.

2006 – Founding Signatory of the UN Principles for Responsible Investing. Candriam was present at the birth of the PRI. Candriam has been participating in industry working groups and sustainable investing organisations since 2003.

2008 – Emerging Markets ESG Investing. We believe that analysing ESG issues in Emerging Markets requires a different approach to accommodate the lower levels of information and transparency, as well as lower levels of issuer and investor experience with ESG factors.

2009 – ESG country framework established. Our analysis of sovereign and related issuers, based on the four pillars of Human Capital, Natural Capital, Social Capital, and Economic Capital.

2010 – ESG Indexed Funds – In 2010, following the controversial armaments exclusions firm-wide, Candriam decided to apply its SRI screening to its indexed fund range

2016 – Engagement: from Initiation to Influence. In 2016, we significantly increased our commitment by dedicating a group of our experienced Sustainable Investing professionals to full-time coordination of our decade-long efforts. Currently, we are putting our Engagement efforts behind three 'Conviction Topics': Corruption, Energy Transition, and Well-Being at Work.

2017 – Responsible Investing in Emerging Market Debt and High Yield Debt. In 2017, our expansion of our ESG included SRI Bond Emerging Markets, and SRI Bond Global High Yield. Five Candriam SRI funds were awarded AFNOR Certifications by the French-government-backed organisation, making our High Yield fund the first to receive an SRI label.

2017 – Helping to Train the Next Generation of Responsible Investors – In October 2017, Candriam launched the Academy for Sustainable and Responsible Investing. The Candriam Academy aims to raise awareness, promote education, and improve knowledge of sustainable investing via an innovative and accredited online educational platform.

2018 – Launch of Fossil Free funds. Launch in September 2018 of two Candriam Fossil Free funds to support investors moving towards carbon neutrality.

2018 – Exclusion of Thermal Coal and Tobacco from all investments. In 2018, all Candriam strategies divested from companies with more than 10% of their activities in thermal coal, and from any companies which initiate new thermal coal projects, based both on stranded asset and sustainability considerations. Candriam also divested from any companies with more than 5% of their activities



stemming from tobacco. These exclusions demonstrate our commitment to both investment performance and responsibility.

2019 – Launch of Climate Action strategy. Launched in May 2019, the fund invests in companies providing tangible solutions in terms of mitigation and adaptation to Climate Change.

2020 – Launch of Circular Economy strategy. Launched in April 2020, the strategy invests in companies providing solutions/services in the advancement of a more sustainable economic model.

2020 and beyond – Holistic Integration of Sustainability in Finance. In 2020 and beyond, we plan to continue to innovate and develop new sustainable investment solutions, as well as to increasingly integrate ESG risks and opportunities in all our investments, drawing on our more than two decades of experience in sustainable investing.

2021 – Joining the Net Zero Asset Manager Initiative. Candriam Announced on the 1st of November 2021 advanced decarbonisation ambition and joins the Net Zero Asset Managers Initiative with the aim to secure a 50% reduction in greenhouse gas emissions across a significant share of its investment portfolio by 2030 and will pursue net zero emissions of its investment portfolio by 2050 or sooner.

2021 – Joining the Net Zero Asset Manager Initiative. Candriam Announced on the 1st of November 2021 advanced decarbonisation ambition and joins the Net Zero Asset Managers Initiative with the aim to secure a 50% reduction in greenhouse gas emissions across a significant share of its investment portfolio by 2030 and will pursue net zero emissions of its investment portfolio by 2050 or sooner.

2021 – Impact Private Debt with Kartesia. Since 2021, Kartesia, as a leading private debt expert, has significantly bolstered its commitment to sustainability by embarking on a partnership with Candriam, as a renowned pioneer in ESG with over 25 years of expertise in Sustainable and Impact Investing, to launch one of the very first European Direct Lending Impact strategy within the industry. This unique strategy marks a significant milestone in Kartesia's sustainability journey and aims to actively pursue investment opportunities that directly and significantly contribute to the UN SDGs.

2023 – Publication of Candriam's Climate Strategy. In 2022, we further integrated climate change at the heart of our ESG strategy and investment philosophy by committing to net zero by 2050 with very ambitious 2030 objectives. We joined the Net Zero Asset Managers Initiative (NZAMI) in November 2021. As part of this commitment, we published an updated Climate Strategy in April 2023. This reflects our awareness and integration into our investments of the fact that our climate is changing faster and faster, bringing our world closer to disastrous social and economic consequences every year.

2024 – Launch of first sustainable Long-Short Strategy. In 2024, Candriam launched its first sustainable long-short strategy, aimed at investors seeking to navigate the complexities of the credit markets with a focus on sustainability. This strategy is designed to provide uncorrelated returns and controlled volatility, leveraging Candriam's extensive experience in sustainable investing and credit analysis.

2.3. How does the company formalise its sustainable investment process?

Management Company – Belfius Asset Management

Belfius Asset Management' approach to responsible investment ranges from a basic screening to apply legal exclusions (controversial activities) to a thematic approach or an approach in which ESG factors are actively taken into account in the investment strategy. Only shares or bonds of companies or countries that perform well on environmental, social or good governance issues, ideally a combination of all three, can then be included in the portfolio.

Belfius Asset Management has, in this context, signed the Charter for Sustainable Investment (PRI - Principles for Responsible Investment) on 28 February 2019.

Our approach to responsible investment is set out in more detail in our responsible investment policy.



As part of responsible investment, Belfius Asset Management has also developed an engagement policy with our asset management partners.

A report on our engagement and voting activities that took place in 2023 can be found in our 2023 Active Ownership Report.

Belfius Asset Management has also been actively involved in the development of the Belgian 'Towards Sustainability' label, a Febelfin initiative defining a uniform framework within the Belgian market for sustainable investment products. The first labels were awarded in November 2019.

For more information, please refer to the website <u>Responsible Investing | Belfius Asset Management</u>.

Investment Management Company - Candriam

At Candriam, we have actively incorporated ESG analysis in our investing since 1996. We believe that a company's long-term value is not purely measurable by purely financial metrics. By evaluating ESG criteria, investors can identify additional factors which affect a company's long-term value.

ESG considerations are central to Candriam's investment philosophy. To this end, Candriam's company-wide controversial activities policy integrates ESG factors including exclusions on controversial weapons, thermal coal and tobacco.

The policy is applicable to all funds for which Candriam has the full discretion as management company and investment manager. Except if otherwise agreed between the relevant parties, the following portfolios are therefore excluded from the scope of this policy:

- Funds for which Candriam is the Management Company but has delegated the investment management activity to another entity.
- Funds for which Candriam is not the Management Company but has received the investment management activity through a delegation by another entity.
- Fund of Funds managed by Candriam where the underlying funds are not managed by Candriam.

For third-party discretionary portfolio mandates, company-wide exclusions are applied if parties so agree. For additional information, please find Company-Wide Exclusion Policy published on our website:

Exclusion Policy | Candriam

In addition to publishing our Transparency Codes, Candriam formalises its responsible investment process through publishing its Sustainability Risk Policy, followed by its Engagement and Proxy Voting Policies:

Sustainability Risk Management Policy | Candriam

Engagement Policy | Candriam

Proxy Voting Policy | Candriam

Responsible Practices at Candriam - Sustainability is embedded in Candriam's business model and forms an essential part of our culture. We are committed to incorporating the global trends that will shape tomorrow's world in our strategic business choices and our daily life. We balance responsible behavior towards our stakeholders with the synergies between our ESG and traditional financial investment activities, as well as with our role in environmental and societal stewardship.

We offer transparency through our annual review of our own internal Environmental, Social, and Governance practices, and the results are published in our annual Corporate Sustainability Report (CSR). Candriam's CSR lists our concrete achievements and our 'deliverables' in our commitment to develop our own company responsibly. The latest version is available on our corporate website at https://www.candriam.com.

Commitment at all levels is essential. Our Group Strategic Committee regularly assesses our relevant sustainability challenges to determine how Candriam should manage our stakeholder relations and how we should attune our business model and practices to all of these long-term challenges.



In 2020, we further clarified the firm's sustainability governance:

- A Strategic Sustainability Committee: the GSC, supported by Candriam's ESG and CSR experts, sets out the strategic orientations for both ESG investing (both product and commercial wise) and CSR.
- **Sustainability Risk Committee:** (company-wide), reporting into GSC, assesses corporate reputational & financial risks regarding sustainability including climate risks and defines a controversial Company and Country Watch list for all Candriam's activities.
- **The Proxy Voting Committee:** furnishes strategic guidance on Proxy Voting best practices and monitor Candriam's voting policy.
- The Candriam Institute for Sustainable Development: oversees Candriam's Philanthropy and community-impact program, through the support of initiatives in ESG Research & Education and in the Social Impact domain.
- **The ESG Steering Committee** coordinates the implementation of the strategic ESG Roadmap, relying on several agile investments, operational and IT workstreams.
- The **CSR Steering Committee:** oversees and coordinates the implementation of the CSR Roadmap across the axes of Staff, Clients, Operational Value Chain, Governance and Community.

As an investment manager, we strive to integrate ESG across all processes, offering the best services and products in ESG Investing. As a company, we commit to upholding the highest sustainability standards in every dimension of our business and we believe that our new ESG Governance Framework will allow us to do so in a more efficient manner.

2.4. How are ESG risks and opportunities – including those linked to climate change – understood/taken into account by company?

Investment Management Company – Candriam

Candriam considers that a company's long-term value is not solely influenced by financial criteria such as income or growth in the operating margin. By incorporating environmental, social and governance (ESG) criteria, we identify other factors liable to influence a company's value and competitiveness over the medium and long term. Within the analysis of Environmental factors, we take into account a company's exposure and strategy in terms of Climate Change.

The inclusion of ESG factors rounds out the assessment of risks incurred by issuers. These risks can be broken down into four categories:

- **Operational risk:** risk of losses stemming from a failure or inadequacy in an institution's procedures, staff, internal systems or due to external events.
- **Reputational risk:** risk of loss in enterprise value stemming from the materialisation of a risk, affecting the perception of the company held by its clients, shareholders, counterparties, regulators or investors.
- **Strategic risk:** risk of losses stemming from an actual or potential risk, affecting capital and profit, and resulting from changes in business model or adverse commercial decisions, a lack of responsiveness to a market development, or the inappropriate implementation of decisions.
- **Financial risk:** risks arising from banking and financial activities, predominantly including foreign exchange, interest rate and liquidity risks.

More specifically, climate change is a source of financial and reputational risk for investors. There are two types of climate risks: physical risks and risks associated with a transition to a low-carbon economy.

Physical risks

Physical risks cover immediate material and financial aspects, as well as operational aspects (e.g. production halts, water scarcity) and reputational aspects (e.g. conflicts with local populations, major migratory flows).

Transition risks

Searching for solutions to climate change issues can generate risks and opportunities for some sectors/companies. In particular, these risks cover:



- Changes in prices of energy resources and energy efficiency, with the added drawback of leaving companies with stranded assets:
 - Reduction of renewable energy costs, and increase in supply of renewable energies, have driven down demand for the highest-polluting energies (with coal in the lead).
 - Reserves of the highest-polluting energies may end up never being used, forcing the owners to write them off.
 - Changes in anti-pollution tax systems and more restrictive carbon markets, driving up prices of CO2 per metric ton.
 - Financing risk for companies active in high-polluting sectors or involved with obsolete energy activities. This risk has arisen due to the growing preference of clients and other stakeholders for energy transition financing and associated risks.

Type of risks

	Risks	Operational	Reputational	Strategic	Financial
sk	Physical risks	ü	ü		
e ris	Transition risks			ü	
ati	- asset value				
Clim	Transition risks - legal and market constraints	ü		ü	ü
_	Transition risks - financing/funding		ü		ü

Candriam decided to exclude companies on a firm-wide level displaying more than 5% in thermal coal activities and those launching new projects in order to take into account potential stranded assets linked to climate change.

At Candriam, the inclusion of ESG criteria is the first step in the responsible investment process. Candriam's ESG analysis is designed to select those issuers that best manage the challenges related to sustainable development, including climate change and energy transition.

All these issuers form the ESG universe. The investment portfolios are then compiled from this ESG universe and in accordance with analysts' recommendations. This rigorous investment process ensures that short-, medium- and long-term ESG and financial risks and opportunities are taken into account and thus adds value to the investment as it enables the selection of issuers best positioned both from a financial point of view and from a sustainable-development point of view.

Furthermore, as described in section 2.3, Candriam has implemented a firm-wide ESG governance structure to ensure proper oversight and information flow of ESG issues. Climate Risks are analysed by the Sustainability Risk Committee which assesses corporate reputational & financial risks. This committee reports directly into Candriam's Group Strategic Committee.

2.5. Which Teams are involved in the company's sustainable investment activity?

Management Company – Belfius Asset Management

Sustainable investment is a responsibility within Belfius Asset Management shared by several teams. The Responsible Investment team is responsible for monitoring and applying the Belfius Group's exclusion policy for the implementation and monitoring of ESG regulations. The team published Belfius Asset Management' results on proxy voting and engagement. In addition to the responsible investment team, the following teams are also closely involved in sustainable investment: the investment team, the fund selection team, the risk monitoring team, compliance and, of course, the IT department, which ensures that the company's systems are adapted to the needs of sustainable investment.

Investment Management Company - Candriam

Candriam launched its first SRI fund in 1996. For more than 20 years now, the company has developed expertise in ESG analysis thanks to its dedicated ESG Team. The team comprises analysts who specialise in specific sectors, sovereign analysis and active engagement activities. The team has developed its own ESG analysis methodology applied to governments, corporations and supranational agencies/organisations.



For the majority of our SRI strategies (i.e., strategies based on our proprietary industry specific ESG materiality framework), the ESG analysts provide recommendations on issuers that determine the eligibility and, as a consequence, the ESG investment universe for the portfolio manager teams. The portfolio managers then apply their respective investment processes and select issuers from this ESG universe. For specific thematic strategies, the eligibility of issuers is determined in conjunction with the investment teams during dedicated committees.

Furthermore, in order to enhance synergies between the ESG Team and portfolio management teams, one or more portfolio managers/analysts on each portfolio management team are designed as "ESG Ambassadors." The ESG analysts regularly take part in Portfolio Management Committees and on an ad hoc, monthly or quarterly basis the ESG ambassadors and ESG Team discuss ongoing projects and exchange ideas on ESG themes.

2.6. How many employees are directly involved in the company's sustainable investment activity?

Management Company – Belfius Asset Management

The ESG workgroup focusing on ESG topics is made of 5 employees.

Investment Management Company - Candriam

Across our front office teams, there are approximately 60 employees that are major stakeholders and directly involved in the company's sustainable investment activity.

2.7. Is the company involved in any RI initiatives?

Investment Management Company - Candriam

General Initiatives	Environmental/Climate Initiatives	Social Initiatives	Governance Initiatives
 □ ECCR – Ecumenical Council for Corporate Responsibility ☑ EFAMA RI WG □ European Commission's High- Level Expert Group on Sustainable Finance □ ICCR – Interfaith Center on Corporate Responsibility ☑ National Asset Manager Association (RI Group) ☑ PRI - Principles For Responsible Investment ☑ SIFs - Sustainable Investment Fora ☑ Other -Please refer to the section below for further information 	 CDP – Carbon Disclosure Project (including Climate Change, and Water and Forest programmes) Climate Bond Initiative Green Bond Principles IIGCC – Institutional Investors Group on Climate Change Montreal Carbon pledge Paris Pledge for Action Portfolio Decarbonization Coalition Other: TCFD -Please refer to the section below for further information 	 Access to Medicine Foundation Access to Nutrition Foundation Accord on Fire and Building Safety in Bangladesh Other Please refer to the section below for further information 	 ☐ ICGN - International Corporate Governance Network ☑ Other -Please refer to the section below for further information

As a responsible asset manager, the United Nations Principles for Responsible Investment are an important initiative to support.

We are proud to have been one of the first signatories to the UN-PRI. The PRIs are a voluntary initiative aimed at encouraging investors to include ESG (Environmental, Social & Governance) considerations in their investment decisions.

The most recent version of the PRI Report is available on the PRI website:

Candriam | Signatory Profile | PRI



Candriam's sustainable commitments

We commit ourselves, as an investor or as a company, to behave in a responsible way. Here below are the statements we have signed or the initiatives we have joined accordingly:

Commitments and statements signed	Thematic	Signed in	Conviction topics
Principles for Responsible Investment (PRI)	ESG	2006	
UNGC Call to Action on Anti-corruption	G	2014	4500
G20 Energy Efficiency Investor Statement	E	2015	\rightarrow
Montreal Carbon Pledge	E	2015	\Rightarrow
Paris Pledge for Action	E	2015	\rightarrow
Investor Statement on ESG Credit ratings	ESG	2017	
Adhesion to Green and Social Bond Principles	ES	2017	
Tobacco-free Finance Pledge	s	2018	
The Investor Agenda	E	2018	\rightarrow
Commitment to support a Just Transition on Climate Change	ESG	2018	\Rightarrow
Task Force on Climate-Related Financial Disclosures (TCFD) supporter	E	2021	\rightarrow
Net Zero Asset Managers Initiative (NZAMI)	E	2021	$\langle + \rangle$
UK Stewardship Code 2020	ESG	2022 application, approved in 2023	
Task Force on Nature-related Financial Disclosures (TNFD)	E	2023, public information 2024	



Collaborative Initiatives

We join forces with other investors to secure greater leverage in calling on stakeholders to act responsibly. The table below shows a non-exhaustive list of active collaborative initiatives, but that Candriam had started to support in previous years, their impact and Candriam specific contributions:

Commitments and statements signed	Thematic	Signed in	Conviction topics
Principles for Responsible Investment (PRI)	ESG	2006	
UNGC Call to Action on Anti-corruption	G	2014	450
G20 Energy Efficiency Investor Statement	E	2015	\rightarrow
Montreal Carbon Pledge	E	2015	\rightarrow
Paris Pledge for Action	E	2015	\rightarrow
Investor Statement on ESG Credit ratings	ESG	2017	
Adhesion to Green and Social Bond Principles	ES	2017	
Tobacco-free Finance Pledge	s	2018	
The Investor Agenda	E	2018	\rightarrow
Commitment to support a Just Transition on Climate Change	ESG	2018	\rightarrow
Task Force on Climate-Related Financial Disclosures (TCFD) supporter	E	2021	\rightarrow
Net Zero Asset Managers Initiative (NZAMI)	E	2021	\Rightarrow
UK Stewardship Code 2020	ESG	2022 application, approved in 2023	
Task Force on Nature-related Financial Disclosures (TNFD)	E	2023, public information 2024	



Initiative name Type	Thematic	Joined/ Renewed in	Candriam role Initiative trigger	Conviction topics
Marine Microplastic Pollution Collaborative Dialogue	E	2020	Mix of support Thematic	
Collaborative Engagement on Uyghurs Slave Labour in the Supply Chain Collaborative Dialogue	S	2020	Mix of support Exceptional event/ Controversy	
Access to Nutrition Index 2021 - 2023 Collaborative Dialogue	s	2021 Renewal	Mix of support Thematic	450
BBFAW Investor Collaboration on Farm Animal Welfare 2021-24 Collaborative Dialogue	E	2021 Renewal	Passive support Thematic	
2021-22 Kingspan Governance Structure Engagement Collaborative Dialogue	SG	2021	Lead Pre/post AGM Engagement	250
Global Banks Climate Change & Biodiversity Collaborative Dialogue	E	2021	Mix of support Thematic	$\langle \uparrow \rangle$
Corporate Accountability for Digital Rights 2021-22 Collaborative Dialogue	s	2021 Renewal	Mix of support Thematic	
Investor Engagement on Facial Recognition 2021 Collaborative Dialogue	s	2021	Active Support Thematic	
FAIRR: Where's the Beef Statement Collaborative Statement	E	2021	Passive Support Thematic	
IIGCC Investor Position Statement: Voting on Transition Planning Collaborative Statement		2021	Thematic	
Net Zero Proxy Advice: IIGCC Investors Letter to Proxy Advisors Collaborative Statement	E	2021	Passive Support Thematic	$\langle \mathbf{A} \rangle$
Healthy Market Initiative Collaborative Dialogue	SG	2021	Active Support Thematic	100
Investor Letter: Linking Access to Vaccine with Pharmaceuticals' Executives' Remuneration Collaborative Dialogue	SG	2021	Mix of support Thematic	**
2022 IIGCC/CERES Banks Engagement Collaborative Dialogue	E	2022	Mix of support Thematic	$\langle \uparrow \rangle$
2022 Letter to Starbucks on Worker Representation Collaborative Dialogue	s	2022	Passive Support Exceptional event/ Controversy	کلک



Initiative name Type	Thematic	Joined/ Renewed in	Candriam role Initiative trigger	Conviction topics
Investor Initiative on Responsible Care - UNI Global led Collaborative Dialogue	S	2022	Mix of Support Exceptional event/ Controversy	
2022 PRI-Coordinated Collaborative Sovereign Engagement on Climate Change: Australian Pilot Collaborative Dialogue	E	2022	Active Support Thematic	
2022 UNPRI Tax Reference Group Collaborative Dialogue	s	2022	Mix of support Thematic	450
2022 Global Investor Statement to Governments on the Climate Crisis Collaborative Statement	ES	2021 Renewal	Passive Support Thematic	
30% Club France Collaborative Dialogue	SG	2022	Mix of support Thematic	বাহ
WBA Investor Engagement on Ethical Al Collaborative Dialogue	ESG	2022	Mix of support Thematic	
FAIRR Biodiversity : Waste & Pollution Collaborative Dialogue	E	2022	Mix of support Thematic	
2022 PRI Advance: Human Rights Collaborative Dialogue	s	2022	Mix of support Thematic	
2023 BFF Bank SpA: Collaborative Engagement on Remuneration Collaborative Dialogue	SG	2022	Lead	كلك
2023 Big Tech and Human Rights Collaborative Dialogue	s	2023 New	Mix of support Thematic	
30% Club Germany Collaborative Dialogue		2023 New	Mix of support Investment team request	
Animal Welfare: Investors' Letter to the EU Collaborative Statement	E	2023 New	Passive Support Thematic	
Breast Milk Substitute Marketing: Abbott Lab Collaborative Statement	SG	2023 New	Passive support Exceptional event/ Controversy	বাহ
CDP Climate, Forest & Water 2023 Collaborative Dialogue	E	2023 Renewal	Mix of support Thematic	



Initiative name Type	Thematic	Joined/ Renewed in	Candriam role Initiative trigger	Conviction topics
Enhancing Legal Framework Say-on-Climate and Shareholder Resolutions Collaborative Dialogue	ESG	2023 New	Passive support Exceptional event/ Controversy	
Eurosif, PRI, IIGCC, EFAMA, UNEP FI: Joint Statement on ESRS Collaborative Statement		2023 New	Passive Support Strategic decision	
FIR: Forced Labour and Child Labour Engagement Collaborative Dialogue	S	2023 New	Active Support Investment team request	
Intesa Sanpaolo's Thermal Coal policy Collaborative Dialogue	E	2023 New	Active Support Thematic	*
Investor Letter to Nike on Wages Owed to Workers Collaborative Statement	S	2023 New	Passive Support Exceptional event/ Controversy	<u>مت</u> م ۵۵۵
Investor Letter to NXP Semi on links to Russia weapons systems Collaborative Statement	s	2023 New	Active Support Exceptional event/ Controversy	
Investor statement on Tobacco Control Collaborative Statement	s	2023 New	Passive Support Thematic	
Nature Action 100 Collaborative Dialogue	E	2023 New	Mix of support Thematic	450
Plastic Solutions Investor Alliance : Petrochemicals Collaborative Dialogue	E	2023 New	Active Support Thematic	450
PRI Nature Reference Group Collaborative Dialogue		2023 New	Active Support Thematic	
Telecom Italia: Delayering Plan Collaborative Dialogue	G	2023 New	Mix of support Exceptional event/ Controversy	
VBDO: Investor call to Reduce Plastic Collaborative Statement	E	2023 New	Active Support Thematic	
VBDO: Plastic Engagement Collaborative Dialogue	E	2023 New	Mix of support Thematic	
Workforce Disclosure Initiative 2023 Collaborative Dialogue	s	2023 Renewal	Mix of support Thematic	



2.8. What is the total number of SRI assets under the company's management?

Management Company - Belfius Asset Management

As of end of December 2023, Candriam manages €19 billion of asset on behalf of Belfius AM for article 8 or article 9 funds.

Investment Management Company - Candriam

Our assets under management dedicated to ESG-related products have reached €111 billion as of December 2023.

2.9. What is the percentage of total SRI assets under the company's management?

Management Company – Belfius Asset Management

As of end of December 2023, 92% of the assets that Candriam manages on behalf of Belfius AM were for article 8 or article 9 funds.

Investment Management Company - Candriam

Our assets under management dedicated to ESG-related products represent 77% of our total AUM, as of December 2023.

2.10. Which are the SRI funds publicly managed by the company?

Management Company – Belfius Asset Management

As of December 2023, the Belfius AM SRI funds (i.e. Article 8 and Article 9 funds), are the following ones:

Belfius Equities Be=Long

Belfius Equities Become

Belfius Equities China

Belfius Equities Climate

Belfius Equities Cure

Belfius Equities Water=Well

Belfius Equities Europe Conviction

Belfius Equities Europe Small & Mid-Caps

Belfius Equities Global Health Care

Belfius Equities Innov=Eat

Belfius Equities Leading Brands

Belfius Equities Move

Belfius Equities Re=New

Belfius Equities Robotics & Innovative Technology

Belfius Equities Virtu=All

Belfius Equities Wo=Men

Belfius Fullinvest Low

Belfius Fullinvest Medium

Belfius Fullinvest High

Belfius Pension Fund Balanced Plus



Belfius Pension Fund High Equities Belfius Pension Fund Low Equities Belfius Portfolio Advanced High Belfius Portfolio Advanced Low Belfius Portfolio Advanced Medium Belfius Portfolio Equities Emerging Markets Belfius Portfolio Equities US Sustainable Belfius Portfolio Euro Short Term Belfius Portfolio Global Allocation 30 Belfius Portfolio Global Allocation 50 Belfius Portfolio Global Allocation 70 **Belfius Portfolio Global Allocation Bonds** Belfius Portfolio Global Allocation Equity Belfius Select Portfolio Sustainable Low Belfius Select Portfolio Sustainable Medium Belfius Select Portfolio World Balanced 40 Belfius Select Portfolio World Balanced 60 Belfius Select Portfolio World Bonds Belfius Select Portfolio World Growth Belfius Select Portfolio World Yield Belfius Sustainable High Belfius Sustainable Low Belfius Sustainable Medium





3. General information about the SRI fund(s) that comes under the scope of the Code

3.1. What is (are) the fund(s) aiming to achieve by integrating ESG factors?

Due to the varying nature of each strategy's investment process, the specific objectives of each strategy will vary and are summarised in the table below:

Fund	Objectives and context
Innov=Eat	 Objectives: 1. The strategy aims to invest in companies that help address the challenges in the food industry and that have a positive contribution towards an efficient and healthy production process. 2. The fund aims to invest in companies that satisfy the food needs of a growing population, with the same amount of available land, with a decreasing active workforce and while confronted with climate change.
	Context: The global population is projected to reach 9.8 billion by 2050, driving a 60% increase in food demand. Over one third of the population may lack adequate food access, partly due to current consumer behaviour wasting 40% of food production. Fruit and vegetable intake is 50% below healthy diet targets.
	Since 2010, mortality from unhealthy lifestyles has increased by 15%. The food industry contributes 35% of global emissions and depletes natural resources, impacting biodiversity. Technology boosts productivity but automates many jobs, posing challenges.
Be=Long	 Objectives: The strategy seeks to contribute to longer life expectancy together with an emphasis on longer quality lives through the integration of ESG factors with a strong focus on global social aspects. To this end, the strategy invests in a diversified portfolio of companies that contribute to better health, improved autonomy through high tech products and happier life by increasing social inclusion. The fund aims to invest in companies whose revenue is based on a weighted average of more than 50% from products and services that contribute to better aging through a healthy, autonomous, and social life.
	Context: The World Health Organisation (WHO), has set up a number of recommendations related to the "healthy ageing" global trend. Among them, physical activities, healthy diet, healthcare solutions including monitoring and diagnostics, housing facilities and social inclusion are top priorities to age in a better way. For instance, healthy nutrition helps prevent diseases such as diabetes, heart disease and cancer. Also, physical inactivity is a major cause of up to 30% of heart diseases and contributes to 6% of the total deaths worldwide. Reduce mortality rate of such diseases is one of the Sustainable Development Goals (SDGs hereafter) of the United Nations (Goal 3.4). Thanks to advanced medical solutions, global mortality rate of ear and cancer diseases among 65+ years old have fallen about 40% since 1950.
Become	 Objectives: 1. The strategy seeks to contribute to the well-being of children by investing in a selection of companies impacting their lives in a positive way. To this end, the strategy invests in a diversified portfolio of global companies that are leading the way towards fulfilling children's basic needs (essentials) and/or contributing to their development and quality of life. The proprietary thematic approach is positive and inclusive, integrating ESG factors while also contributing indirectly to a wide number of SDGs. 2. We aim to provide an opportunity to encourage a positive change, because investing in childhood is to invest in better societies for tomorrow.
	Context: As of today, there are 2.2 billion children on Earth which represents one third of the global population. Nonetheless, children are often overlooked while they are the most vulnerable stakeholders. This is due to the fact that they rely on adults to ensure their rights and needs are both met and respected. Moreover, childhood is a critical period of development not only physical but also mental and emotional, where every experience will have an impact (rather positive or negative) and will define the adults they will become.
Move	Objectives: The strategy seeks to contribute to a safer, greener and more efficient kind of mobility through the integration of ESG factors with a strong focus on global social and environmental aspects. To this end, the strategy invests in a diversified portfolio of companies that actively contribute to a more responsible way of mobility. Companies eligible for this strategy will help preserve the environment by offering solutions that make mobility more environmentally friendly, more safe and more efficient.
	Context As transportation and mobility in general have a profound impact on the environment, on the use of natural resources, on air pollution, on climate change, the inclusion of ESG factors in the investment process adds tremendous value to the traditional fundamental company analysis.
Re=New	 Objectives: 1. The strategy seeks to invest in zero waste economies. The priority of the strategy will be to invest in companies that provide solutions or integrate these solutions in their value chain to converge towards a zero-waste society/ to contribute to drastic waste reduction. 2. This strategy will also contribute to the achievement of the UN 2030 Agenda and its SDGs.
	Context: Participate in a multi decade investment opportunity that will represent an estimated 4.5 trillion- dollar economy by



	2030. Additionally, Europe, as a pioneer, has pledged to achieve a zero-waste economy by 2050, therefore, creating a huge opportunity for 'circular companies'.
Wo=Men	 Objectives: The strategy seeks to contribute to a better gender equality and empower all women and girls through the integration of ESG factors with a strong focus on global social aspects. To this end, the strategy invests in a diversified portfolio of companies that focus and contribute to a better gender balance in leadership & workforce, equal compensations, more promotion of gender equality and more commitment & transparency.
	Context: We focus on gender equality as a growing body of academic and industry research illustrates that companies with higher gender diversity at management level tend to outperform their peers over time. Companies enabling women to lead fulfilling professional lives with the flexibility to accommodate pregnancies are becoming an essential feature to retain female workers and attract talent. In the aftermath of the #metoo movement, gender issues have come to the forefront and the risk of controversies engulfing companies because of mishandling of gender related issues has grown significantly
Climate Action	 Objectives: The strategy seeks to contribute to the advancement of the goals set by the Paris 2°C Agreement with a strong focus on environmental aspects. To this end, the strategy invests in a diversified portfolio of Climate Change solutions providers for the mitigation and adaptation to climate change.
	Context: Climate change represents two main types of risks, physical and transitional risks. The first includes direct damage caused by weather events. The latter results from transitioning to a low-carbon economy and climate resilient future. For example, this risk entails the depreciation of assets, or stranded assets, as a result of regulatory developments that would penalise or even prohibit certain activities deemed too intensive in the emission of greenhouse gases. The degree of risk and opportunities varies across sectors. For instance, this is particularly problematic in the Oil and Gas sector, which is currently experiencing an increase in stranded assets as demand for fossil fuel falls in the transition to a low- carbon economy.
Global Health Care	Objectives: 1. The strategy seeks to contribute to fight against cancer through the integration of ESG factors with a strong focus on global social aspects. To this end, the strategy seeks to invest in a global range of companies that make a difference to cancer patients. The strategy will invest in companies of all sizes that strive for improvements in the research, diagnosis/screening, profiling, and treatment of all cancers
	Context: Patients are central in the strategy, the investment philosophy focusses to find those diagnostics, devices and drugs that have the most impact for patients, it is Candriam' s conviction that those therapies will be prescribed by doctors and in the end will be the best for patients and investors alike.
Cure	At least 85% of the fund assets must be invested in the Master Candriam Equities L Oncology Impact, which itself invests mainly in equity-type transferable securities of companies active in the field of oncology (study, diagnosis,
	treatment, etc. of/against cancer) with their headquarters and/or main activities worldwide.
	treatment, etc. of/against cancer) with their headquarters and/or main activities worldwide. For more information on the integration of ESG criteria, please refer to the above section related to the Global Heath
Water=Well	 treatment, etc. of/against cancer) with their headquarters and/or main activities worldwide. For more information on the integration of ESG criteria, please refer to the above section related to the Global Heath Care fund, which follows the same ESG integration strategy as the Master Candriam Equities L Oncology Impact. Objectives: The strategy seeks to support the transition towards cleaner and more sustainable water solutions, which play a critical role in achieving global temperature reduction targets. Companies are selected based on their ability to alleviate the pressure that human activities place on water resources. This objective is aligned with the SICAV's sustainable objective related to climate change in as much as the transition towards cleaner & sufficient water and more efficient water solutions represents an important step towards achieving the objectives of reducing the global temperature. The strategy also seeks to support companies whose activities demonstrate highly efficient water management. These are companies that make a positive contribution to the preservation water resources by both being large
Water=Well	 treatment, etc. of/against cancer) with their headquarters and/or main activities worldwide. For more information on the integration of ESG criteria, please refer to the above section related to the Global Heath Care fund, which follows the same ESG integration strategy as the Master Candriam Equities L Oncology Impact. Objectives: The strategy seeks to support the transition towards cleaner and more sustainable water solutions, which play a critical role in achieving global temperature reduction targets. Companies are selected based on their ability to alleviate the pressure that human activities place on water resources. This objective is aligned with the SICAV's sustainable objective related to climate change in as much as the transition towards cleaner & sufficient water and more efficient water solutions represents an important step towards achieving the objectives of reducing the global temperature. The strategy also seeks to support companies whose activities demonstrate highly efficient water management. These are companies that make a positive contribution to the preservation water resources by both being large water consumer and reducing their consumption of fresh water consumption, mitigating water-related risks and
Water=Well	 treatment, etc. of/against cancer) with their headquarters and/or main activities worldwide. For more information on the integration of ESG criteria, please refer to the above section related to the Global Heath Care fund, which follows the same ESG integration strategy as the Master Candriam Equities L Oncology Impact. Objectives: The strategy seeks to support the transition towards cleaner and more sustainable water solutions, which play a critical role in achieving global temperature reduction targets. Companies are selected based on their ability to alleviate the pressure that human activities place on water resources. This objective is aligned with the SICAV's sustainable objective related to climate change in as much as the transition towards cleaner & sufficient water and more efficient water solutions represents an important step towards achieving the objectives of reducing the global temperature. The strategy also seeks to support companies whose activities demonstrate highly efficient water management. These are companies that make a positive contribution to the preservation water resources by both being large water consumer and reducing their consumption of fresh water consumption, mitigating water-related risks and seeking to manage freshwater resources efficiently. Context The world is facing a critical water crisis. Despite 70% of the Earth's surface being covered by water, less than 1% is accessible for human use. With 97% of water in the oceans and 2% locked in glaciers, freshwater is alarmingly scarce.

For more specific fund information, such as KPIs used, please refer to each fund prospectus available at this website: <u>https://www.belfius.be/retail/fr/produits/epargner-investir/investir/fonds-sicav/recherche-de-fonds/index.aspx</u>



3.2. What internal or external resources are used for ESG evaluation of the issuers who makes up the investment universe of the fund(s)?

The ESG Investments & Research Team has developed its own ESG methodology applied to governments, corporations and supranational agencies/organisations. The portfolio managers then apply their respective investment processes and integrate ESG information in order to better assess the risks and opportunities that stem from the business activities and operations of companies. The ESG Analysts use internal and external research to feed their models.

The Team strives to source information from diverse sources as we consider information from different providers to be complementary. This is as a result of providers' varying coverage, methodologies, as well as culture which may ultimately lead to discrepancies in views and final ratings. These different assessments enable our ESG analysts to have a more holistic view of a company.

Rating Agencies	Certification	Scope	Scope Types of Screening	
Equileap	-	International companies	Gender equality criteria	https://equileap.org/
Bloomberg	Gender- Equality Index	International Companies	International standardised reporting and disclosure method for workplace gender data.	www.bloomberg.com/GEI
MSCI ESG Research	-	International Companies	ESG Criteria – Controversial Activities – Norms-based Criteria	https://www.msci.com/es g-integration
ISS-Ethix		Emerging Markets Companies	Norms-based Criteria	https://www.issgovernanc
	-	International Companies	Screening criteria used to exclude the weapon industry	e.com/
S&P Trucost	-	International Companies	Environmental Data Greenhouse gas emissions, energy mix, percentage of exposure to fossil fuels	https://www.trucost.com/
Sustainalytics	-	International Companies	ESG Criteria – Controversial Activities – Norms-based Criteria	https://www.sustainalytics .com/
Wood Mackenzie	-	International Companies	Energy and mining sectors screening used to exclude unconventional extractions and thermal coal	https://www.woodmac.co m/
ISS-Oekom	-	International Companies	Sustainable Development Goals measurements	https://www.issgovernanc e.com/esg/
MapleCroft	-	Sovereign Issuers	Country risk metrics and analysis	https://www.maplecroft.co m/
RepRisk	-	Sovereign Issuers	ESG Country risk metrics and analysis	https://www.reprisk.c
EIU	-	Sovereign Issuers	Country risk metrics and analysis Country energy data	https://www.eiu.com/ n/
PRS Group	-	Sovereign Issuers	Quantitative data, political risk and country risk ratings	https://www.prsgroup. com/
Beyond Ratings	-	Sovereign Issuers	ESG performance of economies - Sovereign Credit risk – Climate Objectives Alignment	https://www.beyond- ratings.com/
Carbon4 Finance	-	International Companies	Environmental Data based on energy transition & adaptation to climate change	http://www.carbon4fin ance.com/

Please find below an overview of the external ESG data providers used by the Team:

Furthermore, we also source information from academic experts, sector federations, the media, and NGOs. Examples of NGOs used in analysis include:

- **Freedom House:** measure of freedom and democracy, understood via electoral process, political pluralism, functioning government, rule of law etc. (<u>https://freedomhouse.org/</u>)
- Fraser Institute: measure of human freedom, understood as the absence of coercive constraint (https://www.fraserinstitute.org/)
- **Transparency International (CPI):** measure of public sector corruption. (https://www.transparency.org/)
- Environmental Performance Index (EPI): ranks countries which are best addressing the environmental challenges that every nation faces.



- Paris Equity Check: assesses how fair are countries' climate pledges under the Paris agreement.
- Ease of Doing Business Index: ranks countries on their ease of doing business.

Lastly, our ESG analysts obtain information from various International Organisations, which are either an integral part of the ESG Sovereign framework or serve as additional information in analysis. Examples of International organisations include: World Bank, IMF, World Health Organisation, UN Programme for the Environment, International Labour Organisation, United Nations Development Programme, United Nations Organisation Food and Agriculture Organisation.

3.3. What ESG criteria are taken into account by the fund(s)?

The ESG approach and thematic framework vary for each strategy. Nevertheless, all thematic strategies comprise the two common pillars:

- **Controversial Activities**: exclusion of companies involved in selected activities that do not embody sustainability.
- **Norms-Based Analysis**: companies that do not uphold the principles of the UN Global Compact are excluded.

This exclusion analysis is coupled with an ESG assessment of companies by their ability to create value by integrating sustainability into their business activities and the interest of stakeholders within their operating and financial managerial processes.

Then, all portfolio managers monitor and take into account the sustainability information that they receive from the ESG team and integrate them into their investment processes and decisions in order to better assess the risks and opportunities for each issuer. This ESG integration approach will impact the fundamental and/or credit analysis of issuers, valuation and/or ultimately impact the final portfolio construction. For further information, please refer to question 4.1.

For additional information on the other pillars of ESG approaches, please refer to the dedicated chapters for each specific strategy, as well as the table below, which outlines the thematic frameworks and how they incorporate ESG criteria:

Fund	ESG Criteria per Thematic Framework
Innov=Eat	In the Innov=eat thematic framework, social factors are taken into account to identify the best positioned companies which provide services and products that satisfy the food needs of a growing population, with the same amount of available land, with a decreasing active workforce and while confronted with climate change. These challenges are also picked up by the United Nations (5 step plan) and the European Commission (Green deal – Farm to Fork).
	To look for investment ideas that have a positive contribution towards these challenges we focused on 2 pillars: On the one side the efficient part of the productions process, and on the other side the healthy & nutrition food. Within each pillar we focus on subcategories that show promising future growth such as precision farming, green logistics, decrease in waste and urban farming in the efficient pillar, and organic food, alternative proteins, food safety and food supplements in the healthy pillar.
	We categorised the companies in the efficient pillar under subcategories such as AgriTech, Smart irrigation, Disease treatment and Green logistics & packaging. On the healthy pillar, two other subcategories are displayed, nutritious food and food safety.
Be=Long	In the Longevity thematic framework, social factors are taken into account to identify the best positioned companies which provide services and products that contribute to the global wellbeing and health of the human population who enjoy the benefit of the longer life expectancy. At least 50% of the total portfolio (by AUM) is invested in economic activities contributing to promote healthy, autonomous, and social aging.
	The longevity strategy seeks to contribute to longer life expectancy together with an emphasis on longer quality lives through the integration of ESG factors with a strong focus on global social aspects. The world's population aged over 65 years increased from approximately 130 million in 1950 to 700 million in 2019. By 2050, this number will have doubled to 1.5 billion or 16% of the global population. Longer life expectancy is enjoyable as long as health conditions allow it. However, older population suffers from several diseases such as diabetes, cancer or heart diseases, as well as loneliness and dependency. We believe that private sector has a role to play in providing products and services that respond to those new challenges.
	In the Longevity Thematic framework, we identify companies tackling longevity through healthier, easier and happier life.
	Easier: Seniors are looking for effective solutions to make their lives easier, both at home and on the go. Therefore, smart home, autonomous cares, home related services as well as personal comfort helps older generation to stay independent longer, enjoy a more autonomous life and contribute to their global wellbeing.



	Healthier: Human has gained almost 6 years of healthy life expectancy thanks to an increasing awareness of nutrition and physical activities benefits, as well as medical solutions progress with better diagnostics, monitoring and treatments. Those 3 essential aspects are top priorities of the WHO as well as SDGs to prevent from any kind of diseases.
	Happier: Seniors have successfully completed the magic equation which combines leisure time and available income thanks to a better health condition. Also, seniors are very connected with 70% of American seniors and 50% of Europear seniors using internet, mostly to reach their beloved and family members. Both technologies and traditional leisure companies provide services that increase social inclusion for older generation which is a WHO recommendation for a healthy ageing.
	We believe that a healthier population is essential for the development of each economy; especially in developed countries were the number of 65+ years old has increased significantly and is a current key driver of the globa consumption demand. A healthier population is also a main social challenge as the increasing older population suffer from heath issues.
Become	The investable universe is comprised by a list of companies that have successfully fulfilled our Thematic Framework, a selection of companies supporting children's wellbeing and impacting their lives in a positive way. In that sense, al selected companies have been identified as a provider of direct and tangible solutions (or products) that contribute positively to either children's essentials and/or to their development.
Move	The Future Mobility Thematic Framework naturally embeds environmental criteria addressing certain aspects such as air pollution, natural resources depletion, climate change and alternative energy, whilst the ESG analysis incorporates all three criteria: environmental, social and governance.
Re=New	In the Circular Economy Thematic Framework, due to the nature of the investment process, all issuers selected for investment have undergone the Circular Economy framework assessment. To this end, all selected companies have been identified as a provider of direct and tangible solutions to tackle the circular economy transition.
	Through the circular economy assessment, an investable universe of both enablers and transformers is created and the way the companies in this universe support the transition to a circular economy is key to their strategy, growth and profitability.
Wo=Men	In the Gender Equality thematic framework, social factors are taken into account to identify the best positioned companies which contribute to a better gender balance in leadership & workforce, equal compensations and more commitment & transparency.
	The strategy seeks to contribute to a better balance in companies and governance bodies through the integration of ESG factors with a strong focus on global social aspects.
Climate Action	In the Climate Change thematic framework, environmental factors are taken into account to identify the best positioned companies to provide solutions to climate change challenges through mitigation and adaption technologies, products and services as well as companies that will be able to leverage from the energy transition
Global Health Care	The Global Health Care strategy seeks to contribute to fight against cancer through the integration of ESG factors with a strong focus on global social aspects. To this end, the strategy seeks to invest in a global range of companies that make a difference to cancer patients. The strategy will invest in companies of all sizes that strive for improvements in the research, diagnosis, profiling, and treatment of all cancers.
	According to the WHO, Cancer is the second leading cause of death globally, and is responsible for an estimated 9.6 million deaths in 2018. Globally, about 1 in 6 deaths is due to cancer. In 2017, the World Health Assembly passed the resolution Cancer Prevention and Control through an Integrated Approach (WHA70.12) urges governments and WHC to accelerate action to achieve the targets specified in the Global Action Plan and 2030 UN Agenda for Sustainable Development to reduce premature mortality from cancer. Amongst the pillars, they have highlighted the importance of implementing early diagnosis, screening, and treatment.
Water=Well	In the Water=Well thematic framework, environmental factors are taken into account to identify the best positioned companies which contribute to enable citizens and businesses to access to water that meets their consumption needs (water analysis, filtration and purification, auditing and certification of water treatment plants, etc.), provide solutions for designing infrastructures to manage and optimise flows, provide water transport and storage services, develop solutions to enable more efficient production and use of water.

3.4. What principles and criteria linked to climate change are scrutinised in the Fund(s)?

Candriam believes investment opportunities and risks cannot be fully evaluated using traditional financial metrics alone. We believe that taking into account ESG criteria is a source of long-term value and risk mitigation that cannot be fully captured by traditional financial analysis. To this end, our ESG framework assesses the risks and opportunities to create value through integrating Business Activities and Stakeholder management sustainability factors within their operating and financial managerial processes.

The Business Activities Analysis evaluates the company's exposure (services/products, production areas, market segments, etc.) to the major sustainable development challenges. These challenges are long-term trends liable to considerably influence the economic environment in which companies operate and to determine the future challenges in the market as well as the long-term growth opportunities. Candriam has identified five major challenges including Climate Change.



The Stakeholder Analysis evaluates a company's ability to incorporate stakeholder interests in its longterm strategy, insofar as they are a source of risks and opportunities for the company. These six categories of stakeholders include Investors, Employees, Customers, Suppliers, Society, and the Environment.

To this end, we assess climate change risk and opportunities in both of our Business Activities and Stakeholder. In this top-down approach, we assess a company's business model exposure to climate change through the Business Activities analysis. Conversely, in the Stakeholder Analysis approach, we assess the way an organisation operates to its natural surroundings to conduct its activities.

Furthermore, we apply a norms-based and controversial activities analysis to exclude companies which may represent high risk due to violation of international laws and non-sustainable activities. In the norms-based analysis, we determine whether companies respect the principles of the UN Global Compact, including the respect of Environmental norms.

Lastly, we believe that investing in companies significantly exposed to conventional and unconventional oil and gas activities is not compatible with the efforts towards an energy transition and represent financial risk in terms of stranded assets. To this end, we apply exclusion thresholds based on issuer revenues for these activities.

For more information on Candriam's proprietary ESG corporate framework, see Candriam's Sustainable Investment Definition under SFDR:

Sustainable Investment Definition | Candriam

3.5. What is the ESG analysis and evaluation methodology of the fund manager/fund management company (how is the investment universe built, what rating scale is used etc.)?

For additional information on the ESG methodology per thematic framework, please refer to the below table:

Fund	ESG Methodology per Thematic Framework
Innov=Eat	Our thematic approach favours the selection of companies providing solutions that satisfy the food needs of a growing population, with the same amount of available land, with a decreasing active workforce and while confronted with climate change.
	Potential investee companies that have a positive contribution towards these challenges are analysed via 2 angles: On the one side the efficient part of the productions process, and on the other side the healthy & nutrition food. Within each pillar we focus on subcategories that show promising future growth such as precision farming, green logistics, decrease in waste and urban farming in the efficient pillar, and organic food, alternative proteins, food safety and food supplements in the healthy pillar.
	We categorised the companies in the efficient pillar under subcategories such as AgriTech, Smart irrigation, Disease treatment and Green logistics & packaging. On the healthy pillar, two other subcategories are displayed, nutritious food and food safety.
	We also exclude companies that have more than 10% of revenues derived from ruminant meat production as it is one of the most polluting areas within the food industry. We exclude all companies that fully operate in the manufacturing of insecticides, fungicides, and herbicides as well as the key players of chemical fertilizers (cfr. Farm to Fork). The fund may include companies that are associated with genetically modified organisms but there needs to be a responsible policy in place and evidence of a robust and responsible R&D practice.
	Finally, we analyse if the company has done any product recalls. If there were any, there must be a clear remedy and follow up action to address, mitigate and prevent re-occurrences. Eligible companies need to have individual revenue/capex/orderbook exposure to the activities mentioned above of at least 10%, while at the total portfolio level, the revenue exposure should be at least 50%.
Be=Long	Our thematic approach favors the selection of companies providing solutions to fully enjoy the benefit of the longer life expectancy in the developed countries and prevent against health issues. The analyses conducted in this phase are a result of high synergies between the ESG Analysts and the Investment Team. The Longevity Framework is not only central to the thematic strategy, but it is starting point of the process. All issuers must successfully pass this stage, otherwise they are excluded.
	The thematic framework seeks to capture opportunities in companies for which at least one of the sub-themes (Healthier, Easier, Happier) is central to their growth story. Our Financial analysts determine the level of revenues derived by each company in accordance with our pre-defined themes. The sub-themes must be a significant level of the company revenue,



	at least 30% of total revenue or/and possibly both, the company must have a significant global market share in this category (among the top 5 worldwide).
	Companies that do not display a strong exposure through their revenues to this theme are automatically excluded. Conversely, companies identified as strongly contributing to healthier ageing through either a "ease", a "health" or a "happy" aspect of enjoying longer life expectancy are subsequently subject to an ESG analysis, which is embedded in the fundamental financial analysis.
Become	The thematic framework seeks to invest in companies contributing to children's essentials or to their development on the basis of Candriam analysis. The companies comprising our investable universe must have relevant exposure or reach to one or more of the following sub-themes:
Move	the following sensitive sectors: Breast mil substitutes, Unhealthy products, Aggressive Marketing The strategy applies a thematic investment approach which seeks to select companies exposed to one several building
	 blocks as defined below: Clean Mobility: electric vehicles manufacturers, battery makers, e bike scooters, alternative energy, public transport, emissions control Safe Mobility: autonomous driving, advanced driver assistance systems, vehicle connectivity, next gen traffic systems Smart Mobility: shared economy, work from home, datacentres / 5g, augmented & virtual reality, e-learning, cybersecurity, metaverse
Re=New	The framework for circularity integrates three pillars on which each company we analyse receives score that can go from 0 (extremely weak), to 10 (standout), whereas 5 represents the industry average. Companies with a score below 5 are excluded from the investment universe. The pillars are detailed, as below: Circular Commitment: considers how the company support its circular commitments through its corporate strategy, resource allocation and management focus Circular Results: assesses the type of circularity the company delivers (contribution to using less virgin materials in production processes, contribution to waste collection, sorting, treatment and recycling, contribution to increasing product useful life, and contribution to alternative forms of ownership that reduce new production) Circular Momentum: includes the company's trend towards circularity and how it will contribute to the development of a circular economy in the near future
Wo=Men	The strategy applies a thematic investment approach which focuses on social aspects, more specifically on gender equality. The incorporation of ESG criteria is central to the Gender Equality Thematic Framework and ESG Analysis. More specifically, the Gender Equality Thematic Framework naturally embeds social criteria whilst the ESG analysis incorporates all three criteria: environmental, social and governance.
Climate Action	 Climate Action: Our thematic approach favours the selection of companies providing solutions to address climate change through mitigation and adaptation technologies, products and services. The analyses conducted in this phase are a result of high synergies between the ESG Analysts and the Investment Team. The Climate Change Framework is not only central to the thematic strategy, but it is starting point of the process. All issuers must successfully pass this stage, otherwise they are excluded. Mitigation: Our framework regroups these types of solutions in three categories including 1) alternative energies such as wind and solar; 2) energy storage such as electric vehicle batteries, and 3) energy efficiency such as insulation and/or enzyme technology, which can help mitigate the causes of climate change and limit greenhouse gas emissions. Adaptation: The second involving solutions that aid in adapting to the negative consequences of climate change and pollution. Some of these include floodwater management, waste management, air pollution control or recycling of products and material.
	The thematic framework seeks to capture opportunities in companies for which providing climate change solutions is central to their growth story. Our ESG and Financial analysts determine the level of revenues derived by each company in accordance with our pre-defined categories. Companies may provide both Mitigation and Adaptation solutions, but will be classified in the category that accounts for a larger part of their revenues.
	Given the respective revenues of the company scored and linked to the climate action (sub)themes, we classify this company as a player strongly contributing to Climate Change through mitigation solutions. Our approach is a forward-looking strategy. It not only assesses the current situation of a company as illustrated above, but it also takes into account a company's R&D investments and future development in climate change solutions.
	Companies that do not display a strong exposure through their revenues to this theme are automatically excluded. Conversely, companies identified as strongly contributing to Climate Change through mitigation or adaptation technologies, product and services are subsequently subject to an ESG analysis, which is embedded in the fundamental financial analysis.
	Eligible companies need to have individual revenue/capex/orderbook exposure to the activities mentioned above of at least 10%, while at the total portfolio level, the revenue exposure should be at least 50%.
Global Health Care	The Global Health Care strategy seeks to contribute to fight against cancer through the integration of ESG factors with a strong focus on global social aspects. To this end, the strategy seeks to invest in a global range of companies that make a difference to cancer patients. The strategy invests in companies of all sizes that strive for improvements in the research, diagnosis/screening, profiling, and treatment of all cancers.
	Amongst the pillars, the WHO has highlighted the importance of implementing early diagnosis/screening, profiling, and treatment. In addition, we also invest in companies offering supportive research equipment to make progress on all fronts possible.
	 Diagnosis/screening: When identified early, cancer is more likely to respond to effective treatments and this results in a greater probability of surviving, less morbidity, and less expensive treatment. The British Medical Journal published a paper in 2019 titled: "Cancer survival data emphasis the importance of early detection" (BMJ, published 25 January 2019), providing recent UK data underlining the importance of early detection in multiple tumors. In several major cancer types the difference between early and late detection is dramatic: in colorectal cancer the 1y survival rate is 97.7% if detected in stage I (localised) but drops to only 43.9% when detected in stage 4 (metastatic) in lung cancer it drops from 87.3% to 18.7%.



	 Profiling: aims to identify the molecular drivers of cancer which is important for three different reasons: Identify the drivers of an individual patient tumor which enables the identification of the most appropriate
	 treatments. Understand the molecular basis of different cancer which is crucial information in the search for novel treatments
	 Identify risk factors in people especially in people with a family history of cancer to take in order to enable preventive measures.
	• Treatment: Every cancer type requires a specific treatment regime that encompasses one or more modalities such as surgery, radiotherapy, and medication. It is thus essential to promote the development of a wide array of treatments via investments in medical technology, pharmaceutical and biotechnology companies.
	For this reason, this strategy focuses on companies actively developing products and solutions to these pillars.
	Furthermore, the portfolio is restricted to the Healthcare sector, with a sector deviation limit of 10%. This deviation allows to include technology firms which e.g. provide software for medical image analysis, big data and analysis of patient data etc.
	In order to identify companies, an initial screening is applied to determine the universe of companies involved in Global Health Care. This is based on several independent data sources and AI. This initial screening is applied to all quoted companies above \$100M (~25K companies, fully including the MSCI World index) and results in a universe of about 300 companies with exposure to Global Health Care.
	This list is reduced based on an initial assessment of the Global Health Care exposure and the potential impact of the products for cancer patients. In the eligibility for the restricted universe, we put the patient central and any company that offers a meaningful contribution to improve the life of cancer patients is considered. In this assessment we take into account the current revenue generating products, but also the products in the pipeline.
	In the thematic Global Health Care framework, we assess 3 pillars covering Social and Governance aspects as follows:
	Quality of clinical & scientific data: Global Health Care exposure degree, quality of public clinical data, pipeline composition, development of innovative solutions.
	 Impact for patient & medical need: unmet need covered in Global Health Care (providing significant clinical advantage to patients, targeting high-prevalence indication, targeting indication with limited available treatments), differentiation level vs current products in the market or in development, technology potential and applicability in several indications/cancer types.
	 Company history & management track record: successful business development strategy (in-house product development, licensing and acquisitions), commercial development strategy (number and time to product approval by regulatory agencies), management executing a consistent development/commercial strategy, stable management team, degree of communication and transparency, management prior experience (successfully developed and commercialised products in the past).
	These pillars are evaluated using a 3-option scoring system: 0,1 and 2.
	A maximum score of 2 is given when one or more of the characteristics described above (or similar ones) are met.
	• A minimal score of 0 is given when none of the characteristics described above (or other similar characteristics) are met.
	 Neutral positions were scored as 1, when not enough information supported negative or positive scoring and/or when no detailed assessment was performed due to convincing position for the other 2 evaluated pillars (i.e., no deep assessment of management execution when quality of data and impact for patient are clearly negative or positive).
	We attribute an overall "Global Health Care Score" based on these three pillars for each company. Companies with a score lower than 1 are not eligible.
	Only companies with products making a significant difference for cancer patients and who pass initial filters based both financial, management and product criteria are included (around 150 companies as a rough guidance). Companies that do not display a strong exposure through their revenues and future revenues to this theme are automatically excluded.
	Eligible companies need to have individual revenue/capex/pipeline exposure to the activities mentioned above of at least 10%, while at the total portfolio level, the revenue exposure should be at least 50%.
Cure	The Belfius Cure fund, as the feeder fund, aims to replicate the same strategy as the Master Candriam Equities L Oncology Impact.
	For more information on the integration of ESG criteria, please refer to the above section related to the Global Heath Care fund, which follows the same ESG methodology as the Master Candriam Equities L Oncology Impact.
Water=Well	The framework for water solutions integrates ESG criteria through a top-down and bottom-up approach. The top-down approach focuses on treating water through analysis, filtration, and auditing; supplying water via infrastructure and efficiency; and protecting water through intelligent agriculture and resilience to extreme weather. The bottom-up approach emphasises governance and water strategy, risk measurement, and tracking results and progress. Additionally, an in-depth thematic analysis evaluates companies along the water value chain, including water treatment, supply, and protection, using a proprietary taxonomy to assess revenue exposure and correlation to the theme.

Controversial Activities Analysis

A company's exposure to controversial activities is evaluated according to several parameters covering the following variables:



- **Type of involvement:** the type of involvement (direct or indirect) is taken into account for each company evaluated (owners and operators, manufacturers and producers, retailers and suppliers, product suppliers or providers of support services, etc.).
- **Degree of involvement**: this is based on an approach in terms of level of involvement and applied to all types of controversial activities. Production capacities or income stemming from such activities are generally used as key indicators.
- **Responsible policy:** in addition to the type and degree of involvement, it is important to look at how the company addresses and perceives its potentially controversial activities. Consequently, the presence (or absence) of an appropriate, targeted responsible policy is critical to the purpose of this analysis. This type of policy acknowledges the company's involvement in a controversial activity, but also the existence of systems and practices designed to ensure that the activity is carried out responsibly

The exclusion thresholds for exposure to controversial activities are presented in the tables below, separated for Belfius Equities Be=Long which follows the Level 2a Exclusion Policy, and other thematic strategies in scope of this Transparency Code:

	Level 2a Exclusions ¹
Controversial Armaments	 Any involvement in: Anti-personnel Landmines; Cluster Bombs; Depleted Uranium; Chemical Weapons; Biological Weapons
	Any involvement in nuclear weapons and white phosphorus
	 Companies involved in the exploration, processing, transportation and distribution of thermal coal (5% revenue threshold)²
Thermal Coal	 Companies involved in the extraction of thermal coal (>0% revenues)²
	• Companies developing new projects in coal extraction, coal power generation or coal transportation
Горассо	 Production: any involvement²
TODACCO	Distribution: 5% revenue threshold
Conventional Armaments	10% revenue threshold
Electricity Generation	Companies with new coal or nuclear-based projects
	Carbon Intensity above 312gCO2/kWh
	Unconventional O&G:
	 Companies involved in unconventional oil & gas extraction (>0% revenues)
	 Companies providing services and equipment dedicated to unconventional oil & gas extraction (>25% revenues)
Dil & Gas	Conventional O&G:
	 Companies involved in conventional oil & gas extraction (>0% revenues)
	Unless (the two conditions have to be met):
	 The company dedicates over 20% of its capex to renewable energy AND,
	The company does not explore or develop new oil & gas projects
Gambling	10% revenue threshold
Nuclear Power	 30% revenue threshold³
	Producers/Distributors that:
	● are not RSPO ⁴ members and derive between 0% and 5% of their revenues from palm oil with less tha
	20% of this oil being RSPO-certified palm oil, and that have no deforestation policy in place; or
Palm Oil	 are not RSPO members and derive more than 5% of their revenues from palm oil with less than 50% of this oil being RSPO-certified palm oil, and that have no deforestation policy in place.
	Buyers that:
	 are not RSPO members and whose revenues are dependent on palm oil for more than 5%, with less than 50% of this oil being RSPO-certified palm oil, and that have no deforestation policy.
Mining	• UNGP ^{5,} OECD
Therefore, thresholds are analy	are subject to the constraints inherent to the availability of ESG data and to the underlying data methodologies sed and implemented on a best-effort basis. , as specified in Candriam's Exclusion policy of carbon intensity.

⁴ RSPO: Roundtable on Sustainable Palm Oil

⁵ UNGP: United Nations Guiding Principles



For the Belfius Equities Water=Well, Equities Be=Come, Equities Climate, Equities Cure, Equities Innov=Eat, Equities Move, Equities Re=New, Equities Wo=Men the Level 3 SRI Exclusion Policy applies, as detailed below.

	Level 3 Exclusions ¹
Controversial Armaments	 Any involvement in: Anti-personnel Landmines; Cluster Bombs; Depleted Uranium; Chemical Weapons; Biological Weapons
	Any involvement in nuclear weapons and white phosphorus
hermal Coal	• 5% revenue threshold ²
	Companies developing new projects
Tobacco	 Production: any involvement²
	Distribution: 5% revenue threshold
Conventional Armaments	• 3% revenue threshold
Electricity Generation	Companies with new coal or nuclear-based projects
	Carbon Intensity above 312gCO2/kWh
	Unconventional and conventional Oil & Gas:
Dil & Gas	 Companies involved in the exploration, production, refining or transport of oil & gas (>5% revenues),
	 Companies providing services and equipment dedicated to oil & gas production (> 25% revenues)
	Companies with expansion or exploration plans for new oil and gas projects
Corporate Activities in	• 10% revenue threshold ²
Oppressive Regimes	Engagement triggered for certain selected companies with 5 and 10% revenue exposure
Adult Content	• 5% revenue threshold
Alcohol	10% revenue threshold
Animal Testing	No responsible policy and no legal requirement to test
Sambling	5% revenue threshold
GMO	10% and no responsible policy
Nuclear Power	• 30% revenue threshold ³
	Producers/Distributors that:
	• are not RSPO ⁴ members and derive between 0% and 5% of their revenues from palm oil with less than
	20% of this oil being RSPO-certified palm oil, and that have no deforestation policy in place; or
Palm Oil	 are not RSPO members and derive more than 5% of their revenues from palm oil with less than 50% of this oil being RSPO-certified palm oil, and that have no deforestation policy in place.
	Buyers that:
	 are not RSPO members and whose revenues are dependent on palm oil for more than 5%, with less than 50% of this oil being RSPO-certified palm oil, and that have no deforestation policy.
Mining	• UNGP ^{5,} OECD
¹ Candriam's exclusion policies Therefore, thresholds are analy	are subject to the constraints inherent to the availability of ESG data and to the underlying data methodologies. sed and implemented on a best-effort basis.
	as specified in Candriam's Exclusion policy
³ Threshold applies regardless	
RSPO: Roundtable on Sustair	
UNGP: United Nations Guidin	a Principles

⁵ UNGP: United Nations Guiding Principles

For more details, please refer to Candriam's Exclusion policy, which can be viewed on their website: Exclusion Policy | Candriam

Please note that the above exclusions apply to the levels of Candriam's Exclusion Policy that are applicable to each respective fund. Additionally, Candriam ensures that all funds under the Towards Sustainability label fully comply with the latest corporate and sovereign exclusion criteria outlined in the Quality Standards, available on the website via: <u>Quality Standard Towards Sustainability 2023</u>.



Compliance with these label requirements is closely monitored by Candriam.

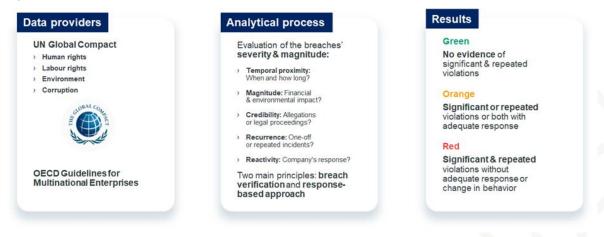
Norms-Based Analysis

Candriam conducts a norms-based analysis to determine whether each company inherently respects the principles of the United Nations Global Compact. The analysis is designed to filter out those companies which have significantly and repeatedly breached any of the principles on Human Rights, Labour Rights, the Environment, and Anti-Corruption.

We exclude companies for which there is evidence of repeated and significant violations of Global Compact principles and where the organisation has adopted no appropriate response or change in behaviour.

Emphasis is placed on the company's response. A management which acts to prevent recurrence is preferable to one which fails to acknowledge responsibility, or which takes no corrective measures.

Breaches are assigned a colour code for each of the main principles categories. For an issuer to be able to successfully negotiate the norms-based analysis filter, it must not have been attributed a "red" flag in any of the four fields.



Candriam has defined a list of companies presenting the most severe violations of the 10 UN Global Compact Principles and excluded from all article 8 strategies. The final decision is under the responsibility of the Sustainability Risk Committee which assesses and monitors sustainability risks for Candriam's investment activities.

Business Activities Analysis

Companies are exposed, through their business activities, to major long-term ESG trends that can strongly influence the environment in which they operate and that may shape their future market challenges and long-term growth. In reverse, companies' business activities contribute, positively or negatively, to sustainability objectives.

We have identified five key sustainability trends: Climate Change, Resources Depletion, Digitalisation, Health & Wellness, Demographic Evolution – which are analysed using Candriam's proprietary framework.





Examples



Decarbonize business activities across the board, focusing on the most CO₂ intensive sectors

Deploy **renewable energy** as fossil energies are progressively phased out Mitigate impact of business activities on ecosystems to preserve biodiversity

Harness the opportunities to drive higher industrial and resource efficiencies through diaital technologies

DIGITALIZATION

& INNOVATION

Protect data privacy, build strong and resilient digital networks

Invest in human capital through job creation, gender

HEALTHY LIVING

& WELLBEING

equality and decent working conditions Foster R&D in fatal and chronic diseases and support universal

Reduce impact of air pollution on human health through

access to healthcare

improved air quality

Prepare for the requirements arising from a Western aging society

SHIFTS

DEMOGRAPHIC

Support the demographic boom in emerging countries through investment in infrastructure and the food supply chain

We analyse each companies' business activities, taking into account the industry or sector in which each company operates, its geographic location, and business model. We determine the degree to each business activity is exposed to and contributes to the five major development challenges and score them from 0 to +100.

We assess a company exposure, through its revenue generation, assets, CAPEX etc., to the five key sustainable challenges.

For example, within the Mining sector, steel receives a more negative score on "Resources & Waste" than do metals of the platinum group; while within the Food sector, companies producing healthy products receive a more positive score than junk food.



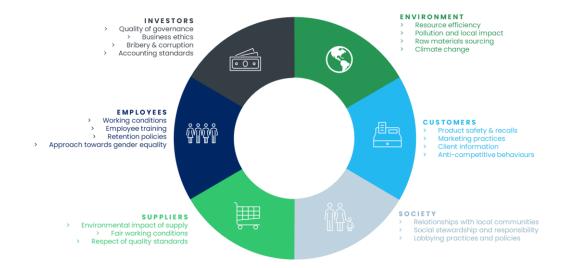
Based on the conclusions of the sector analysis, all the company's exposures to the major sustainable development challenges specific to the sector are evaluated and scored. For each company, the score is the weighted average of the five key sustainable challenges, ranging from 0 to +100. A lower score reflects the company's lower exposure to these major challenges.

Stakeholder Analysis

Relationships with stakeholders give rise to opportunities as well as risks and are therefore determinants of long-term value. How a company manages its stakeholders, i.e. takes into account their long-term interests in its strategy and operations, is essential in assessing whether a company conducts its activities in a sustainable and responsible fashion.

We have identified six categories of stakeholders: Investors, Environment, Employees, Customers, Society, Suppliers.





Our analysis integrates materiality assessments, meaning that we determine the relevance of each stakeholder based on qualitative and quantitative data. Based on the relevance, we determine weights for each category. For example, in the energy sector, we place a strong weight on the Environment. In the software sector, we place more emphasis on Investors.



For example, in the energy sector, we place a strong weight on the Environment, in Financials for the banking sector; we place more emphasis on Investors. Within the broad categories, we also assign weight by materiality. For Energy, within the category of 'relations with employees', we stress health and safety; for Financials, within the category of 'relations for investors, we emphasise corporate governance.

Engagement (overarching dimension)

In addition to the positive and negative selection described above, engagement is a key part of our longterm investment process, given its potential impact on investor returns. Candriam engages with the management of its investment candidates on a range of aspects. Engagement takes the form of a direct and individual dialogue between ESG analysts and the representatives of the company and other stakeholder.

ESG Score

Following the Business Activities and Stakeholder Analyses and respective scoring, we then combine both scores (out of 100) to form an ESG rating for each individual issuer. Both pillars take on a weighting, depending on their materiality for each sector & company and yield an ESG Rating from ESG 1 (Best) to ESG10 (Worst).





A more fundamental analysis, called "ESG Conviction", may supplement our ESG analysis which uses a more materiality-based approach. This analytical framework focuses on the most relevant ESG risks and opportunities to which issuers are exposed in order to select those best positioned in terms of sustainability. Issuers are scored against material KPIs to determine the final ESG score and eligibility. ESG Conviction analysis is applied as a complement to our current process to enrich certain fundamental and active ESG investment strategies.

ESG screening and analysis

Based on the ESG analysis and screening steps (ESG analysis, violations of the UN Global Compact, exclusion of controversial activities) outlined in the previous paragraphs, the analysed investment universe of the Sub-Fund is reduced by at least 25%, removing from its issuers with significant ESG risks¹.

3.6. How often is the ESG evaluation of the issuers reviewed? How are any controversies managed?

Our ESG universe is updated on a monthly basis taking into account the latest data from external providers.

Each sector is periodically analysed by assessing the evolution of sustainability trends, as well as the relevance and materiality of each model or framework used.

The goal is to ensure that the models used by the analysts optimally reflect the sustainable development risks and opportunities affecting the sector in question. Companies are continuously monitored and the sector is reviewed at least twice a year.

If there is a major event that may affect the rating assigned to a company (i.e. merger and acquisition, scandal, sustainability controversy etc.), the ESG analyst will launch an ESG alert on the issuer. This alert means that the portfolio manager will no longer be able to add to his position in this issuer. The output of an SRI Alert can be:

- An immediate change in the final decision on the company's eligibility criteria (from "eligible" for an SRI portfolio to "non-eligible"). In this case the portfolio manager must sell the position within a month period.
- No immediate change in the final decision on the company's eligibility, but there is a high probability that there will be a change in the near future following the result of the analysis. No immediate selling is required. Within the following three months of the alert, the company will be reviewed according to the new information. A longer period for the revision is allowed when justified by objective reasons, such as, on-going dialogue with the company or awaiting the result of a lawsuit.

¹ Please note that this is not applicable to the Belfius Be=Long strategy



If an issuer is newly excluded due to the company-wide exclusion or norms-based filter, each portfolio manager has to sell the position within a period of one month. Depending on market conditions, rare exceptions may be granted by the CIO, RM & the Global Head of ESG Investments & Research in order to accommodate, for example, a potential liquidity issue.

For additional information, please refer to the <u>Sustainability Risk Policy | Candriam</u>.

4. Investment Process

4.1. How are the results of the ESG research integrated into portfolio construction?

Candriam's ESG investment process is a two-step process that first of all calls for the definition of the eligible investment universe, followed by a financial selection which includes ESG considerations to select issuers within the eligible ESG universe. Companies included in the fund universe have successfully passed the Thematic Framework and the ESG Screening. After filtering on the basis of thematic, sectoral and/or geographical criteria, the eligible universe is reduced according to norms-based exclusions and controversial activity exposures. Any investment outside the ESG universe is prohibited.

The selection of ESG issuers is confirmed by the ESG team on a monthly basis, and on a one-off basis in exceptional circumstances.

When there is a change in the ESG universe and an issuer is excluded, the approach consists in excluding this issuer from the SRI portfolios within a period of one month. Depending on market conditions, rare exceptions may be granted by the CIO, RM & the Global Head of ESG Investments & Research in order to accommodate, for example, a potential liquidity issue.

The Risk Management department ensures that all securities in the portfolios comply with the ESG universe. The financial selection of issuers from within this ESG universe is based on financial analysis and the optimal management of risks and opportunities of the portfolio.

ESG considerations are taken into account within the individual investment processes. Our ESG integration approach leverages on the frameworks and analysis conducted by the ESG Team. The analysis and views resulting from the ESG analysis are embedded in our financial frameworks. The consideration of ESG aspects in the financial framework will impact the final issuer score/color and valuation for our equity strategies. To this end, integrating ESG considerations will ultimately impact the construction of the final portfolio.

ESG Integration for Equity Strategies

At Candriam, we integrate ESG information and analysis into equity investment decisions in order to better assess the risks and opportunities that stem from the business activities and operations of companies. Respecting and preserving the distinct nature of each philosophy and approach across our range of fundamental, thematic and emerging markets funds, Candriam's fundamental equity investment strategies are impacted at each of the following levels: Eligible Universe, Fundamental Analysis, Valuation and Portfolio Construction.

Subsequent to definition of the eligible universe by the ESG screening of controversial activities and norms-based (cfr. 3.5), ESG criteria is embedded into the investment process as follows:

Fundamental Analysis

Candriam's fundamental analysis is based on five pillars: Quality of Management, Business Growth, Competitive Advantage, Value Creation and Financial Leverage. Each of these pillars receives a colour/score that determines the final assessment of a company.

Candriam's fundamental equity strategies² take into account the "Business Activities Analysis" and "Stakeholder Analysis" scores in fundamental analysis and "Company Valuation" as follows:



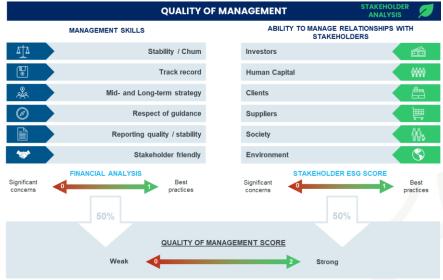
quality of management

² Applicable for developed markets (Emerging Markets get a specific analysis)



In order to obtain a holistic view on the overall governance and soundness a company's management, we assess a company's relationships with several stakeholders by considering and integrating qualitative ESG information and quantitative ESG scores that result from the ESG stakeholder analysis. Further to the assessment of strategy, stability, track record, corporate communication and other financial criteria, we assess the Management team on its relationships with its stakeholders.

The ESG Stakeholder analysis is taken into account in the Quality of Management assessment. If the company 'stakeholder' score belongs to the 3rd tertile of its universe³, the 'Quality of Management score' cannot be 'green'.



Business Growth

In the assessment of business growth, the ESG Business Activities analysis of issuers is taken into account. Candriam has identified key long-term sustainability trends which strongly influence the environment in which companies operate and which influence their future market challenges and long-term growth and prosperity.

The five defined key Sustainability Trends illustrated above are analysed in order to assess the growth potential in conjunction with other key market drivers and regulatory risk.

More specifically, we consider the supply & demand dynamics as well as market drivers, the score resulting from the ESG Business Activities analysis, and potential regulation constraints to determine the overall score for the pillar.



³ Investment universe varies across strategies



Competitive Advantage

We perform an intrinsic analysis of products and services, R&D, customer support, and other areas relevant to the company's business, including opportunities and risks resulting from sustainability regulation considerations.

We use the Porter concepts to analyse the competitive position of the company in its industry, such as the threat of new entrants, threat of substitutions, and the bargaining power of suppliers and customers. We check potential constraints resulting from sustainability regulation and assess their impact on the competitive advantage of the company, as well as risks and opportunities including barrier to entry.

For instance, given the ambitious climate objectives of many countries across the globe, there has been a strong emergence of regulations and legislations pertaining to emissions, pollution, amongst other environmental considerations. To this end, we expect companies that have business activities that positively contribute to those environmental objectives to outperform in the long run.

This analysis leads to a qualitative view which is taken into account in our overall assessment in this pillar.

Final Fundamental Assessment

For each criteria, companies receive one of the following scores or colors: 0/Red (weak), 1/Orange (medium) or 2 /Green (strong quality). All the five scores are then compiled in order to get a global score/colour grade of the companies which determine the "quality score" of a company: "High Quality" (Green), "Satisfying Quality" (Orange) and "Low Quality" (Red).

The ESG assessment is a contributing factor to determine the final colour/score of a company, which in turn will determine the weighting of this position in the final equity portfolio.

Company Valuation

We further evaluate the dynamics of their profitability and growth, the liquidity of the equity, and valuation. Our valuation is predominantly based on DCF models using at least five years of projected Free Cash Flow, based on our internal projections.

We adjust the discount rate based on the final score/colour of a company which takes into account ESG criteria. For example, for green companies, we reduce the discounting rate within our DCF. This modification has a significant impact on the DCF- valuation.

Portfolio Construction

Within the eligible universe, the process is mainly colour-based, bottom-up stock selection; weightings in the portfolio are function of the global colours of the companies. The sector weight deviations from the benchmark are not a strategic objective; they result from our convictions on individual stocks, with top-down sanity checks and other deviation boundaries.

The weight is significantly impacted by the colour grade (including the ESG score), and the upside potential derived through our valuation analysis (that takes the ESG score into account as well). We favour companies that are 'green' in all aspects. An 'orange' company will have a lower weight and 'red' companies are in principle excluded, or extremely reduced, depending on the process.

4.2. How are criteria specific to climate change integrated into portfolio construction?

ESG factors are embedded in the financial process in order to better assess risks and opportunities. The results of the Business Activities analysis, which includes assessing exposure of corporates to climate change, are integrated in our financial/credit framework. It will thus have an impact on the final issuer score/colour and valuation for our equity strategies and the credit recommendation for fixed income strategies. Moreover, each investment strategy aspires to have a lower carbon emission in comparison to its relative benchmark or below an absolute threshold, depending on the investment



strategy. Recall that all strategies may not invest in any company that derives more than 5% of its revenue coming from Thermal Coal.

For further information on ESG integration, please refer to question 4.1.

4.3. How are the issuers that are present in the portfolio, but not subject to ESG analysis evaluated (not including mutual funds)?

All issuers that are in the portfolio are subject to an ESG assessment and must be determined eligible based on the process described under 3.5.

4.4. Has the ESG evaluation or investment process changed in the last 12 months?

Our ESG evaluation or investment process has not changed in the last 12 months.

4.5. Is a part of the fund(s) invested in entities pursuing strong social goals/social enterprises?

The fund covered by this Code seeks to invest does not actively seek to invest in entities pursing strong social goals. However, as the fund applies an ESG approach across all asset classes, its investments are geared towards companies that display sound ESG practices and that do not harm society.

In our framework, companies which demonstrate the pursuit of strong social goals benefit from a higher ESG score. Furthermore, in sectors in which societal interactions are key, we place a stronger emphasis on this aspect by overweighting these factors in the final ESG score.

4.6. Does (do) the fund(s) engage in securities lending activities?

The funds do not conduct securities lending/borrowing, except for the Global Health Care fund for which we vote on all issuers and recall securities if needed.

4.7. Does (do) the fund(s) use derivative instruments?

Depending on the investable asset classes and within the limits defined by the approved prospectus, SRI portfolios may use derivatives, as defined below. The general principle on the use of derivatives is that short positions via derivatives can only be used to cover long positions. No net short positions are authorised, except in exceptional cases where adequate hedging cannot be achieved due to lack of instrument coverage.

For all derivative transactions, the fund is required to use as counterparty, only those financial institutions that comply with the principles of the United Nations Global Compact, as described in Section 3.3 of this Code at the time of the transaction.

Please find below our standard policy on derivative instruments as defined by the ESG Risk Policy:

- Interest rate futures: management of the funds in question involves the regular use of interest-rate futures based on government bonds belonging to the SRI universe, in order to adjust the portfolio's duration (upward or downward) across the different segments of the yield curve. These transactions are limited by the legal rules applicable to funds subject to the European Directive, i.e., to 100% of the fund's assets (including other derivatives). As the underlying is included in the SRI universe, there is no impact on the fund's ESG quality.
- Interest-rate swaps: management of the funds in question may involve the use of interest-



rate swaps in order to trade a fixed rate for a variable rate, if the counterparty belongs to the SRI universe. These transactions are limited by the legal rules applicable to funds subject to the European Directive, i.e., to 100% of the fund's assets (including other derivatives). As the underlying is included in the SRI universe, there is no impact on the fund's ESG quality.

- Equity swaps: these transactions are permitted, provided that the index or basket of shares meets the criteria of the SRI universe.
- **Credit derivative indices:** management of the funds in question may involve the temporary use of credit-derivative indices, in cases where the funds must quickly adjust their exposure to the markets. These positions are temporary (max one week) and are limited to 10% of the fund's assets.
- **Credit Default Swaps (CDS):** the funds in question may use CDS on an SRI issuer in the portfolio if the counterparty to the transaction is a financial institution that also belongs to the SRI universe. As both the issuer subject to the CDS and the counterparty to the transaction belong to the SRI universe, these transactions have no impact on the fund's ESG quality.
- Equity index futures: management of the funds in question may involve the temporary use of equity index futures, in cases where the funds must quickly adjust the portfolio's exposure to the equity markets. These positions are temporary (max one week) and are limited to 10% of the fund's assets.
- Forwards: forwards are exclusively used to quickly adjust the portfolio's exposure to foreign exchange risk in the event of strong market fluctuations or a major change in the portfolio's composition. These transactions, which have no impact on the fund's ESG quality, have to be done with a credit institution that is part of the SRI universe.
- Listed options / OTCs on individual equities or on bond issuers: these options are valid provided the issuers are in the SRI universe.

Single underlying derivatives must be compliant with the company-wide exclusion policy.

4.8. Does (do) the fund(s) invest in mutual funds?

Depending on the investable asset classes and within the limits defined by the approved prospectus, the investment strategies may invest in mutual funds. External funds must have an exclusion policy relating to controversial weapons, thermal coal and tobacco.

5. ESG Controls

5.1. What internal and/or external control mechanisms are in place to ensure compliance of the portfolio with the ESG rules on managing the fund(s) as defined in section 4?

At Candriam, Several departments are in charge of internal control: risk management, internal audit and compliance.

Each department is independent of the Fund Management Department and is placed directly under the authority of Candriam's Group Strategic Committee.

The risk management department ensures that the securities making up the strategies, classified as Article 8 according to the SFDR, comply with the company-wide exclusion policy.

One of the tools used by this department is the constraints server, a tool that combines all the constraints and limits required to manage the investment funds. It contains regulatory and contractual constraints as well as internal limits and constraints used to prevent operational errors. Constraints are applied, for example, to the:

- ESG investment universe
- List of 39 authorised investments
- Potential ratios (liquidity, dispersion) defined
- Main regulatory constraints applicable to the fund
- "List of credit warnings" and "list of equity warnings".

Once the constraints have been configured in the constraint's server, any order entered by the portfolio manager is immediately checked against them before the order is sent to the markets (*ex-ante* control). The portfolio manager is alerted in the event of a breach of constraint.

The Internal Audit Department carries out inspections and subsequently advises as necessary to ensure the performance and effective implementation of the internal control system in force. The inspection missions represent the lion's share of the audit department's work and aim to provide the Group Strategic Committee with an objective and independent assessment of a particular domain (function, process, system,).

Management Company - Belfius Asset Management

Belfius Asset Management will continuously monitor its investment portfolios in light of the abovementioned standards and engage with investment managers of the underlying funds to obtain a formal engagement on their part that Belfius Asset Management's ESG principles will be respected at all times.

The occurrence of deviations from Belfius Asset Management's ESG policy are expected to be limited. Belfius Asset Management will furthermore review fund managers engagement policies.

The following steps will be taken:

- Companies in an investment fund in breach with one of the controversial activities will be identified by Belfius Asset Management with the support of a specialised research firm;
- Belfius Asset Management informs the fund manager and requests the fund manager to justify its position & if necessary to commence a dialogue with the companies involved, or to cease investing in the companies.

If it appears however that an investment fund does no longer meet these principles, and, after a dialogue with Belfius Asset Management, the fund manager does not take steps to bring the portfolio back in line with Belfius Asset Management's policy, the investment into the fund will be sold off.

The fund manager will be given a maximum of 12 months to meet Belfius Asset Management's criteria by excluding companies or through engagement with these companies. If, after a 12-month period, the investment fund still does not act in accordance with the criteria as defined by Belfius Asset Management, Belfius Asset Management will make a decision as to whether the investment into the fund should be maintained or divested.



6. Impact measures and ESG reporting

6.1. How is the ESG quality of the fund(s) assessed?

The ESG quality of the fund is assessed through internally developed ESG scores based on our proprietary ESG model (business activities analysis, stakeholder analysis, controversial activities and norms-based analysis). The scores are measured against the fund's benchmark. We track the ESG quality using an overall ESG score as well as E, S and G scores, as illustrated below:

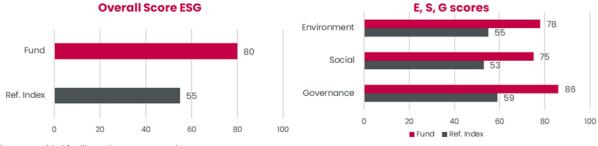


Image provided for illustrative purposes only.

6.2. What ESG indicators are used by the fund(s)?

The following metrics are generally tracked at the fund level:

- ESG Scoring & Distribution
- ESG Impact Indicators, such as (but not limited to):
 - $\circ \quad \text{Carbon footprint}$
 - o Carbon intensity
 - Weighted Average Carbon Intensity
 - o Renewable energy production
 - o Water consumption
 - o Water intensity
 - Weighted Average Water Intensity (WAWI)
 - o Board gender diversity
 - o Board independence
 - o Collective bargaining agreements
 - Exposure to carbon-related assets in the power generation sector

For our thematic strategies, we track the following ESG indicators, which may vary by fund and include, but are not limited to:

- UN Sustainable Development Goals SDG contribution score
- Real Life Impacts -- emissions savings, water savings
- Biodiversity programmes
- Employee fatality rate
- Fossil fuel exposure
- Bribery & corruption policy
- Money laundering policy

Please note that these indicators are tracked internally and not disclosed publicly.



6.3. What communication resources are used to provide investors with information about the SRI management of the fund(s)?

Management Company - Belfius Asset Management

The documents and information on this fund address the ESG quality of the portfolio via:

- The fund's investment strategy
- The selection of the largest exposures in terms of securities in the portfolio, as described in the fund reports.

Details of the securities in the portfolio are also available in dedicated product sheets provided to investors.

Investment Management Company - Candriam

Candriam, the investment manager of the fund, also publishes documents in order to enhance ESG transparency for investors. Please find below examples of additional documents published on an annual basis.

Candriam's funds are described on the corporate website via the fund-search engine:

Funds | Candriam

The Stewardship report incorporating Engagement and Proxy Voting reviews can be viewed on Candriam's website:

Annual Engagement & Voting Report | Candriam

The Corporate Social Responsibility Report of the investment manager of this fund, Candriam, can be viewed at the following link:

CSR Report | Candriam

6.4. Does the fund management company publish the results of its voting and engagement policies?

Yes, the company publishes the results of its voting and engagement policies. Please refer to question 6.3. for the links to our publications.





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Candriam consistently recommends investors to consult via our website www.candriam.com the key information document, prospectus, and all other relevant information prior to investing in one of our funds, including the net asset value ("NAV) of the funds. This information is available either in English or in local languages for each country where the fund's marketing is approved.

Specific information for Swiss investors: The appointed representative and paying agent in Switzerland is RBC Investors Services Bank S.A., Esch-sur-Alzette, Zürich branch, Bleicherweg 7, CH-8027 Zurich. The prospectus, the key investor information, the articles of association or as applicable the management rules as well as the annual and semi-annual reports, each in paper form, are made available free of charge at the representative and paying agent in Switzerland