



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](#)

Juni 2025



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1. List of Funds Covered by the Code

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

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.

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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.

2024 – Publication of Candriam's Biodiversity Strategy. In 2024, Candriam published its Biodiversity strategy, based on the proprietary model that we developed in-house over the years prior. This strategy addresses the urgent issue of biodiversity loss, emphasising its significant impact on global markets and economies. Candriam's approach highlights the necessity of integrating biodiversity considerations into investment decisions to mitigate risks and foster sustainable growth. This strategy acts as a catalyst to accelerate our commitment to biodiversity preservation.

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 2024 can be found in our 2024 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 [Responsible Investing | Belfius Asset Management](#).

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 rooted in Candriam's operating model and forms a key part of our corporate culture. Candriam's sustainable development strategy enables us to consider and incorporate sustainability trends that shape the world of tomorrow within the process of defining our firm's strategic orientations and investment activities. Our philosophy is to establish and maintain a balance between responsible behaviour towards all stakeholders and the pursuit of sustainable financial performance.

To that end, Candriam has set up a governance structure that allows Candriam to manage and monitor all relevant sustainability and responsibility issues concerning its investment activities, be it from a fiduciary, legal, compliance, investment and/or risk management perspective.

The governance structure and instances, shown below, ensure a solid and comprehensive decision-making process when it relates to the sustainability and responsibility aspects of our corporate and investment management activities. It also enables Candriam to consider sustainability risks and opportunities at all governance levels of the organization.

The key committees relating to ESG are as follows:

- The **Board of Directors** is responsible for strategy and general policy. It ensures that Candriam has defined and implements a strategy in relation to ESG and corporate sustainability.
- The **Candriam Board of Management** is Candriam's key decision-making body on strategic issues including ESG and corporate sustainability. It examines and approves relevant sustainability policies, including those covering sustainability risks, climate and human rights. It meets once a month.
- The **Group Strategic Committee (GSC)** sets out the strategic orientations for the firm's ESG investing Corporate Sustainability, with sustainability focus-sessions supported by Candriam's ESG and CSR experts.

ESG

- The **Sustainability Risk Committee (SRC)** oversees Candriam's management of sustainability and extra-financial risks in investments. It approves ESG frameworks, monitors climate and human rights risks, sets firm-wide ESG restrictions, and supervises breaches and engagement action plans.
- The **Proxy Voting Committee** provides strategic guidance on proxy voting best practices and monitors Candriam's voting policy.
- The **Client Solutions Committee (CSC)** and **Product Range Committee (PRC)** are the main bodies of Candriam's regular product governance. They steer & manage the product approval and review process, including the ESG/Sustainability characteristics of products & services.
- The **ESG Steering**, presided by Nicolas Forest, Chief Investment Officer, follows-up on the implementation of the strategic ESG roadmap, and consists of investment, operational, IT and regulatory team workstreams.

CSR

- The **CSR Ethics Committee** assesses & monitors human rights risks related to Candriam's operations, including Human Resources and Suppliers. It monitors the human rights due diligence process embedded within Candriam's operations and follows up on issues alerted by operational, procurement or risk teams or via the Compliance whistleblowing procedure.
- The **Candriam Institute for Sustainable Development** oversees Candriam's philanthropy and community impact program, through the support of initiatives in ESG research, education & entrepreneurship, social inclusion & solidarity, environment, and the fight against cancer.
- The **CSR Steering** coordinates the implementation of the CSR roadmap and CSR reporting in the context of Candriam's own operations, across staff, clients, operational value chain, governance and the community.

ESG + CSR

The **Sustainability Regulations Committee** oversees the follow-up of ESG/CSR regulations and coordinates the implementation of the Sustainability regulatory roadmap.

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
Climate risk	Physical risks	ü	ü		
	Transition risks - asset value			ü	
	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
<input type="checkbox"/> ECCR – Ecumenical Council for Corporate Responsibility <input checked="" type="checkbox"/> EFAMA RI WG <input type="checkbox"/> European Commission's High-Level Expert Group on Sustainable Finance <input type="checkbox"/> ICCR – Interfaith Center on Corporate Responsibility <input checked="" type="checkbox"/> National Asset Manager Association (RI Group) <input checked="" type="checkbox"/> PRI - Principles For Responsible Investment <input checked="" type="checkbox"/> SIFs - Sustainable Investment Fora <input checked="" type="checkbox"/> Other <i>-Please refer to the section below for further information</i>	<input checked="" type="checkbox"/> CDP – Carbon Disclosure Project (including Climate Change, and Water and Forest programmes) <input type="checkbox"/> Climate Bond Initiative <input checked="" type="checkbox"/> Green Bond Principles <input checked="" type="checkbox"/> IIGCC – Institutional Investors Group on Climate Change <input checked="" type="checkbox"/> Montreal Carbon pledge <input checked="" type="checkbox"/> Paris Pledge for Action <input type="checkbox"/> Portfolio Decarbonization Coalition <input checked="" type="checkbox"/> Other: TCFD <i>-Please refer to the section below for further information</i>	<input checked="" type="checkbox"/> Access to Medicine Foundation <input checked="" type="checkbox"/> Access to Nutrition Foundation <input checked="" type="checkbox"/> Accord on Fire and Building Safety in Bangladesh <input checked="" type="checkbox"/> Other <i>-Please refer to the section below for further information</i>	<input checked="" type="checkbox"/> ICGN - International Corporate Governance Network <input checked="" type="checkbox"/> Other <i>-Please refer to the section below for further information</i>

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 and collaborative Initiatives

As an investor and a company, we are committed to acting responsibly. For the latest on Candriam's sustainable commitments and collaborative initiatives, please refer to our Engagement & Voting report, available on our website: [Engagement & Voting Report](#)

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 2024, Candriam manages €21 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 €116 billion as of December 2024.

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 2024, 94% 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 75% of our total AUM, as of December 2024.

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

Management Company – Belfius Asset Management

As of December 2024, 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 Digit=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 75
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 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	<p>Objectives:</p> <ol style="list-style-type: none"> 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. <p>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.</p> <p>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.</p>
Be=Long	<p>Objectives:</p> <ol style="list-style-type: none"> 1. 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. 2. 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. <p>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.</p>
Become	<p>Objectives:</p> <ol style="list-style-type: none"> 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. <p>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.</p>
Digit=All	<p>Objectives:</p> <ol style="list-style-type: none"> 1. The strategy seeks to provide shareholders with the growth potential of global equities in companies contributing to the technological revolution and to outperform the benchmark index. This revolution manifests in various ways, and the fund aims to capture different trends within it, such as artificial intelligence, cybersecurity, automation software, and advanced connectivity. <p>Context: Technology is transforming industries, economies, and daily life at an unprecedented pace. This strategy invests in companies driving the technological revolution, focusing on AI, cybersecurity, automation, and advanced connectivity. These innovations create new growth opportunities while reshaping the future of work, communication, and infrastructure. By investing in businesses that enable and benefit from these trends, the strategy seeks to capture long-term value while positioning shareholders at the cutting edge of global progress.</p>
Move	<p>Objectives:</p> <ol style="list-style-type: none"> 1. 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. <p>Context</p>

	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	<p>Objectives:</p> <ol style="list-style-type: none"> 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. <p>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'.</p>
Wo=Men	<p>Objectives:</p> <ol style="list-style-type: none"> 1. 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. <p>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</p>
Climate Action	<p>Objectives:</p> <ol style="list-style-type: none"> 1. 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. <p>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.</p>
Global Health Care	<p>Objectives:</p> <ol style="list-style-type: none"> 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 <p>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.</p>
Cure	<p>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.</p> <p>For more information on the integration of ESG criteria, please refer to the above section related to the Global Health Care fund, which follows the same ESG integration strategy as the Master Candriam Equities L Oncology Impact.</p>
Water=Well	<p>Objectives:</p> <ol style="list-style-type: none"> 1. 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. 2. 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. <p>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. Without immediate action, the world could face a 40% water shortage by 2050.</p> <p>Currently, 2 billion people lack access to safe drinking water, and over 3 million die yearly from waterborne diseases. Agriculture consumes nearly 70% of available water, while industrial use accounts for 20%. With urban water demand expected to rise by 50% by 2050, the strain on water resources will only increase.</p> <p>The strategy is designed to address these growing challenges by supporting the transition towards cleaner and more sustainable water solutions by investing primarily in equities of small, mid and large cap companies, which provide solutions to treat, transport, distribute and valorise water ("Water Solution Enablers"), as well as companies that, through their own processes in high water use sectors, lead the reduction in water intensity ("Water Efficiency Leaders").</p>

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

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.

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

Rating Agencies	Certification	Scope	Types of Screening	Link
Carbon4 Finance*	-	International Companies	Environmental Data based on energy transition & adaptation to climate change	https://www.carbon4.com/
Equileap	-	International Companies	Gender equality criteria	https://equileap.org/
ISS	-	International Companies	Norms-based Criteria Screening criteria used to exclude the weapon industry Sustainable Development Goals measurements	https://www.issgovernance.com/esg/
Sustainalytics	-	International Companies	ESG Criteria – Controversial Activities – Norms-based Criteria, EU Taxonomy	https://www.sustainalytics.com/
Urgewald	-	International Companies	ESG Criteria – Controversial Activities – Fossil fuel industry data	GCEL 2023 Global Coal Exit List Home gogel
S&P Trucost	-	International Companies	Environmental Data Greenhouse gas emissions, energy	https://www.trucost.com/

			mix, percentage of exposure to fossil fuels	
Bloomberg	Gender-Equality Index	International Companies	International standardized reporting and disclosure method for workplace gender data.	www.bloomberg.com/GEI
MSCI ESG Research	-	International Companies	ESG Criteria – Controversial Activities – Norms-based Criteria, some PAI	https://www.msci.com/esg-integration
RepRisk	-	Sovereign Issuers	ESG Country risk metrics and analysis	https://www.reprisk.com/
MapleCroft	-	Sovereign Issuers	Country risk metrics and analysis	https://www.maplecroft.com/
PRS Group	-	Sovereign Issuers	Quantitative data, political risk and country risk ratings	https://www.prsgroup.com/
EIU	-	Sovereign Issuers	Country risk metrics and analysis Country energy data	https://www.eiu.com/n/
EDGAR	-	Sovereign Issuers	GHG intensity of investee countries	EDGAR - The Emissions Database for Global Atmospheric Research

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. (<https://freedomhouse.org/>)
- **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.
- **ND-Gain Index:** assesses countries' vulnerability to climate change and other global challenges in combination with their readiness to improve resilience.

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

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	<p>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).</p> <p>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.</p> <p>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.</p>
Be=Long	<p>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.</p> <p>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.</p> <p>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.</p> <p>In the Longevity Thematic framework, we identify companies tackling longevity through healthier, easier and happier life.</p> <p>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.</p> <p>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.</p>

	<p>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 European 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.</p> <p>We believe that a healthier population is essential for the development of each economy; especially in developed countries where the number of 65+ years old has increased significantly and is a current key driver of the global consumption demand. A healthier population is also a main social challenge as the increasing older population suffer from health issues.</p>
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, all 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.
Digit=All	<p>The investable universe is comprised of companies worldwide that contribute to the technological revolution. This revolution manifests in various ways, and the fund aims to capture different trends within it, such as artificial intelligence, cybersecurity, automation software, and advanced connectivity.</p> <p>This compartment is a high-conviction fund, meaning it is managed based on a rigorous selection of a limited number of stocks across all market capitalizations. The stock selection is based on three pillars: Thematic Selection, and Fundamental Analysis.</p> <p>Companies are selected based on their revenue exposure to one or more technological trends, including:</p> <ul style="list-style-type: none"> • Cloud Modernization: Advances in cloud technology that make infrastructure more flexible and cost-effective. • Cyber Security: Technologies and practices aimed at protecting IT systems, networks, and data from digital attacks. • Next-Gen Devices: Advanced technologies integrating innovations such as Artificial Intelligence, 5G, and Augmented Reality to enhance performance, seamless connectivity, and user experience • Silicon Evolution: Technological advancements in semiconductors, which are increasingly essential for powering next-generation technologies. • Connecting the Future: Ultra-fast, low-latency technologies like 5G and Wi-Fi 6, shaping the future of internet connectivity. • Green Tech: Technologies that reduce environmental impact by improving energy efficiency, supporting renewable energy, sustainable resource management, and lowering carbon emissions. • Automation Software: Software solutions that streamline and automate repetitive tasks and processes, improving efficiency, accuracy, and productivity across businesses. <p>AI & Data: Innovations in Artificial Intelligence and data-driven technologies.</p>
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	<p>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.</p> <p>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.</p>
Wo=Men	<p>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.</p> <p>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.</p>
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	<p>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.</p> <p>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 WHO 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.</p>
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 long-term 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	<p>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.</p> <p>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.</p>

	<p>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.</p> <p>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.</p> <p>Companies that are eligible must have an individual exposure to the above-mentioned activities of at least 10%, measured based on revenue, CapEx, or the order book.</p>
Be=Long	<p>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.</p> <p>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).</p> <p>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.</p>
Become	<p>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:</p> <ul style="list-style-type: none"> ○ Essentials (Water, Nutrition, Sanitation, Health Care, Housing, Family Support) ○ Development (Education, Financial Inclusion, Infrastructure, Safety, Sports & Leisure) <p>The ESG team monitors children-related controversies thoroughly across all sectors and activities and with a stronger focus the following sensitive sectors: Breast mil substitutes, Unhealthy products, Aggressive Marketing</p>
Move	<p>The strategy applies a thematic investment approach which seeks to select companies exposed to one several building blocks as defined below:</p> <ul style="list-style-type: none"> • 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 <p>Companies that are eligible must have an individual exposure of at least 10% to activities related to greener, safer, and smarter mobility, measured by revenue, CapEx, or the order book.</p>
Re=New	<p>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:</p> <ul style="list-style-type: none"> • 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	<p>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.</p>
Climate Action	<ul style="list-style-type: none"> • 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. <p>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.</p> <p>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.</p>

	<p>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.</p> <p>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. Companies that are eligible must have an individual exposure of at least 10% to activities related to the mitigation of the causes of climate change and/or adaptation to the negative impacts of climate change, measured by revenue, CapEx, or the order book.</p>
Global Health Care	<p>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.</p> <p>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.</p> <ul style="list-style-type: none"> ● 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: <ul style="list-style-type: none"> ○ 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. <p>For this reason, this strategy focuses on companies actively developing products and solutions to these pillars.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>In the thematic Global Health Care framework, we assess 3 pillars covering Social and Governance aspects as follows:</p> <ul style="list-style-type: none"> ● 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). <p>These pillars are evaluated using a 3-option scoring system: 0,1 and 2.</p> <ul style="list-style-type: none"> ● 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). <p>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.</p>

	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.
Cure	<p>The Belfius Cure fund, as the feeder fund, aims to replicate the same strategy as the Master Candriam Equities L Oncology Impact.</p> <p>For more information on the integration of ESG criteria, please refer to the above section related to the Global Health Care fund, which follows the same ESG methodology as the Master Candriam Equities L Oncology Impact.</p>
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.

Candriam's forward-looking ESG Analysis framework comprises five dimensions structured as follows:

Two negative screening dimensions:

1. 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 Exclusion Policy¹ Compliant with Climate Transition Benchmark (CTB) exclusions ²	Level 3 SRI Exclusion Policy¹ Compliant with Paris-Aligned Benchmark (PAB) exclusions ³
Exclusion of controversial corporate activities:			
Controversial Armaments	Banned by international conventions or local regulations	<ul style="list-style-type: none"> Any involvement in: Anti-personnel landmines; Cluster bombs; Depleted uranium; Chemical weapons; Biological weapons; White phosphorus; Blinding lasers and Non-detectable fragments² 	
	Nuclear weapons	<ul style="list-style-type: none"> Any involvement in nuclear weapons 	
Thermal Coal		<ul style="list-style-type: none"> Companies directly involved in coal extraction (>0% revenues) Companies with expansion plans (new projects) in coal mining or coal-based power generation 	<ul style="list-style-type: none"> Companies directly involved in coal extraction (>0% revenues)³ Companies with > 1% revenues from the value chain of thermal coal (including extraction and supporting products and services)³ Companies with >5% revenues from the value chain of thermal coal including coal power generation⁴

		<ul style="list-style-type: none"> Companies with expansion plans (new projects) in coal mining or coal-based power generation Companies with a coal power generation capacity above 5 GW
Tobacco	<ul style="list-style-type: none"> 5% revenue threshold Production: any involvement² 	
Conventional armaments	<ul style="list-style-type: none"> 10% revenue threshold 	<ul style="list-style-type: none"> 3% revenue threshold
Corporate Activities in Oppressive Regime		<ul style="list-style-type: none"> 10% revenue threshold (unless a suspension of activities or plans to exit the country have been announced)⁴ Engagement triggered for certain selected companies with 5 and 10% revenue exposure
Adult Content		<ul style="list-style-type: none"> 5% revenue threshold
Alcohol		<ul style="list-style-type: none"> 10% revenue threshold
Animal Testing		<ul style="list-style-type: none"> No responsible policy and no legal requirement to test
Gambling	<ul style="list-style-type: none"> 10% revenue threshold 	<ul style="list-style-type: none"> 5% revenue threshold
Genetically Modified Organism (GMO)		<ul style="list-style-type: none"> 1% revenue threshold
Pesticides		<ul style="list-style-type: none"> 1% revenue threshold derived from pesticide production for the Agriculture sector
Electricity Generation	<ul style="list-style-type: none"> Companies with new coal or nuclear-based projects Carbon intensity above 279gCO₂/kWh 	<ul style="list-style-type: none"> Companies with new coal or nuclear-based projects Carbon intensity above 279gCO₂/kWh Companies deriving 50% or more of their revenues from electricity generation sources with a carbon intensity above 100 gCO₂e/kWh³
Nuclear Power	<ul style="list-style-type: none"> 30% revenue threshold⁵ 	<ul style="list-style-type: none"> 30% revenue threshold⁶
Oil & gas	<p>Unconventional oil & gas:</p> <ul style="list-style-type: none"> Companies with any involvement in unconventional oil and gas extraction (shale gas, shale oil, tar sands, arctic⁷ drilling, deep water drilling, extra heavy oil) <p>Conventional oil & gas:</p> <ul style="list-style-type: none"> Companies involved in conventional oil & gas extraction (>0% revenues) <p>Unless (the two conditions have to be met):</p> <ul style="list-style-type: none"> The company dedicates over 20% of its capex to renewable energy AND, The company does not explore or develop new oil & gas projects 	<p>Unconventional and conventional oil & gas</p> <ul style="list-style-type: none"> Companies with >5% revenues from exploration, extraction or refining of conventional or unconventional O&G and/or transportation of oil Companies with >10 % revenues from exploration, extraction, distribution, or refining of oil fuels³ Companies with >25% revenues from O&G related activities such as supporting products/services, distribution, retail, petrochemicals and equipments. Companies with expansion or exploration plans for new oil and gas projects
Palm oil	<ul style="list-style-type: none"> Producers and distributors in the sector that are not RSPO⁸ members 	<p>Producers/Distributors that:</p> <ul style="list-style-type: none"> Derive >1% of their revenues from palm oil unless: <ul style="list-style-type: none"> they are RSPO member; OR have 50% of palm oil being RSPO-certified AND have a deforestation policy <p>Buyers that:</p> <ul style="list-style-type: none"> Derive >10% of their revenues from palm oil unless: <ul style="list-style-type: none"> they are RSPO member; OR have 50% of palm oil being RSPO-certified AND have a deforestation policy

Norms-based exclusions	Candriam's Red List: Companies with one or more Red Rating in areas covered by the relevant norms or conventions, including UNGC ⁹ pillars and the OECD ¹⁰ Guidelines for Multinational Enterprises ^{2,11}
<p>¹ Candriam's exclusion policies are subject to the constraints inherent to the availability of ESG data and to the underlying data methodologies. Thresholds are analysed and implemented on a best-effort basis.</p> <p>² The threshold aligns with the Climate Transition Benchmark (CTB) as per Article 12(1)(a)-(c) of Commission Delegated Regulation (EU) 2020/1818</p> <p>³ The threshold aligns with the Paris-Aligned Benchmark (PAB) as per Article 12 of the Commission Delegated Regulation (EU) 2020/1818</p> <p>⁴ Certain exceptions may apply</p> <p>⁵ Threshold applies if carbon intensity not available</p> <p>⁶ Threshold applies regardless of carbon intensity</p> <p>⁷ The Arctic geographical Coverage (APAC)</p> <p>⁸ RSPO: Roundtable on Sustainable Palm Oil</p> <p>⁹ UNGC: United Nations Global Compact</p> <p>¹⁰ The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises</p> <p>¹¹ The conventions of the International Labour Organisation and the International Bill of Human Rights are among the international references embedded in the normative analysis</p>	

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.

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: [Quality Standard Towards Sustainability](#). Compliance with these label requirements is closely monitored by Candriam.

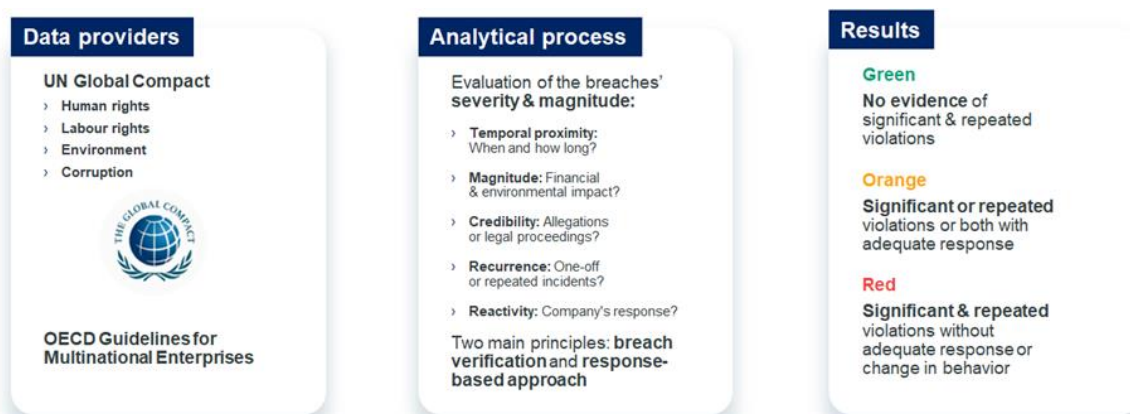
2. Norms-Based Analysis

The norms-based analysis determines whether a company complies with the 10 principles of the United Nations Global Compact for each of the main categories: **Human Rights (HR)**, **Labour Rights (L)**, **Environment (ENV)** and **Anti-Corruption (COR)**. Additionally, Candriam assesses whether the company violates the principles of the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. Furthermore, the conventions of the International Labour Organisation (ILO) and the International Bill of Human Rights are among the international references embedded in the normative analysis and Candriam's ESG analysis framework.

Candriam excludes companies with one or more Red Rating in areas covered by the relevant norms or conventions, including UNGC pillars and the OECD Guidelines for Multinational Enterprises, collectively referred to as Candriam's Red list.

Emphasis is placed on a company's response when an incident occurs. A company that takes positive, responsible measures to ensure that future breaches do not occur is considered more favourably than a company that does not acknowledge its responsibility and/or does not take any 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" rating in any area covered by the corresponding set of norms or conventions.

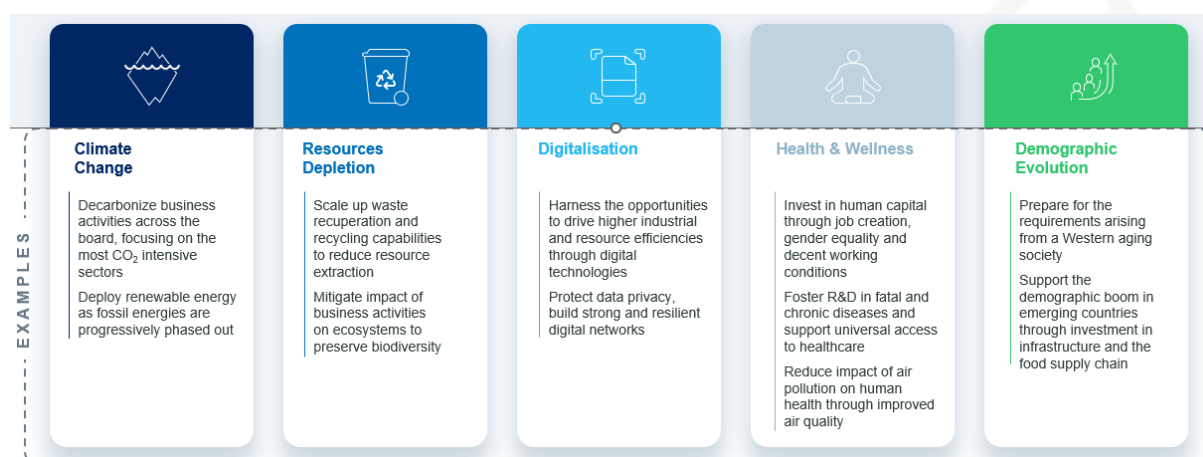


Two positive screening dimensions:

3. 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.



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 which 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.

4. Stakeholder Analysis

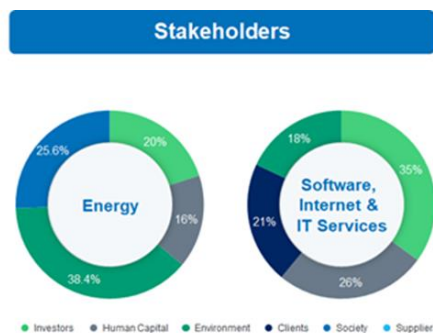
Relationships with stakeholders give rise to opportunities as well as risks and are therefore determinants of long-term value. How a company manages its stakeholders, i.e. takes into account their long-term interests in its strategy and operations, is essential in assessing whether a company conducts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

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

Stakeholder Analysis: looking at every dimension of how businesses are run



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.

This analysis (positive screening) is applied through two distinct but interconnected processes:

- Overall ESG assessment: Firstly, our analysis allows for an evaluation of the overall sustainability of issuers, which results in an overall ESG Rating for each issuer.
- Specific E/S contribution assessment: Secondly, Candriam uses specific elements of its ESG analytical framework in a dedicated process for assessing contributions to environmental and/or social objectives, which results in an Environmental Contribution Score and/or Social Contribution Score for each issuer.

And the overarching engagement dimension:

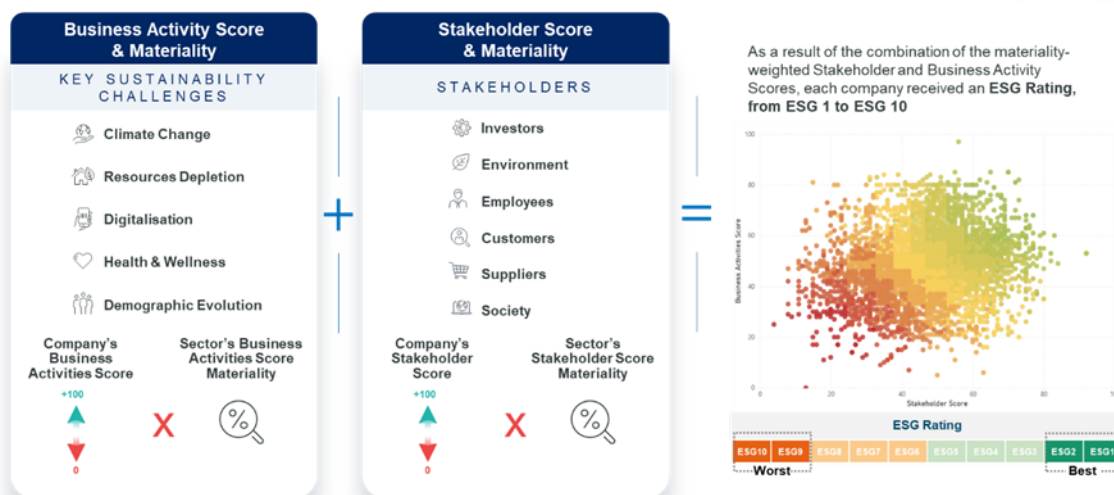
5. Engagement

In addition to the positive and negative selection described above, engagement is a key part of our long-term 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 & ESG eligible universe

Overall ESG assessment

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.

Specific E/S contribution assessment

Candriam has developed a process for assessing and scoring companies' contributions to environmental and social objectives, resulting in Environmental (E) and Social (S) Contribution Scores. This process integrates Business Activity Analysis and Stakeholder Analysis to evaluate sustainability and responsibility.

For environmental contributions, Candriam examines companies' roles in addressing Climate Change and Resource Depletion through their business activities and their management of environmental impacts on stakeholders.

For social contributions, Candriam assesses how companies address Key Sustainability Challenges like Health & Wellness and Digitalisation through their business activities and stakeholder management, particularly focusing on employees and suppliers.

The Environmental (E) and Social (S) Contribution Scores, ranging from 0 to 100, combines scores from business activity and stakeholder analysis.

These E and S Contribution Scores determine if companies qualify as 'Sustainable Investments' under the SFDR. Companies must meet a minimum score of 50 in either or both categories and comply with overall ESG Ratings, the DNSH principle, and good governance criteria. Depending on the sector, companies are evaluated for their environmental, social, or combined contributions to determine their eligibility for sustainable investment.

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.

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

- 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.

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 [Sustainability Risk Policy | Candriam](#).



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

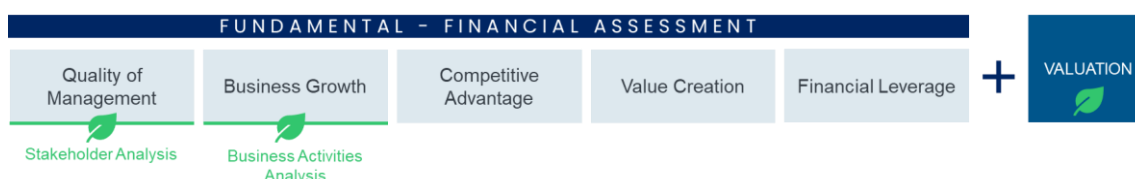
At Candriam, we integrate ESG information and analysis into equity investment decisions in order to better assess the risks and opportunities that stem from the business activities and operations of companies. Respecting and preserving the distinct nature of each philosophy and approach across our range 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:

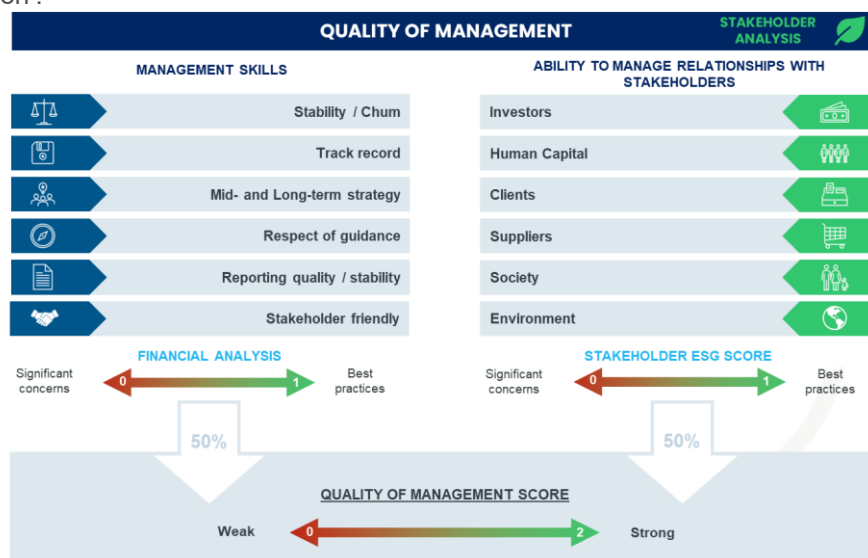


Quality of Management

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 pursuing 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 37 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 above-mentioned 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:

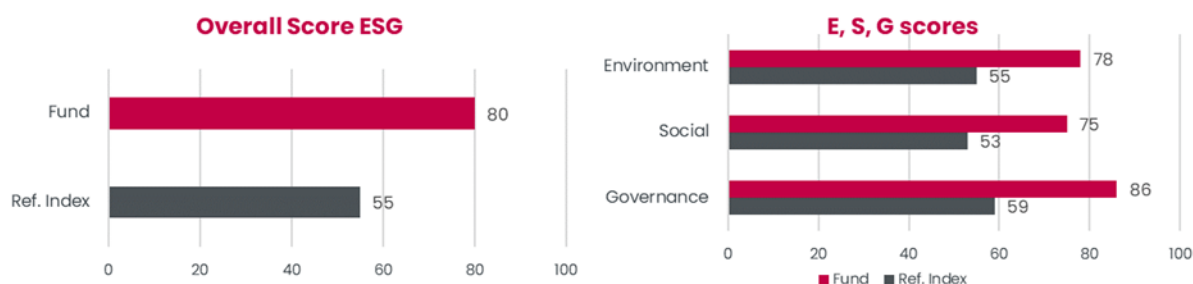


Image provided for illustrative purposes only.

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):
 - Carbon footprint
 - Carbon intensity
 - Weighted Average Carbon Intensity
 - Renewable energy production
 - Water consumption
 - Water intensity
 - Weighted Average Water Intensity (WAWI)
 - Board gender diversity
 - Board independence
 - 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