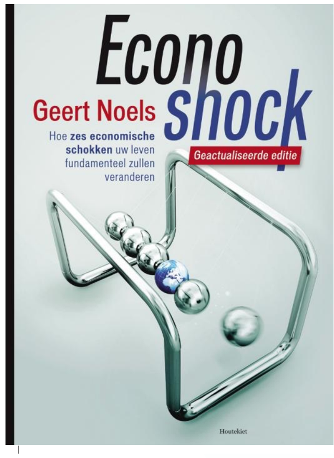
January 2024

Econopolis Invest - EcoVi Equities DBI/RDT

ESG - policy

EcoVi Equities DBI/RDT is a component of *Econopolis Invest*, a SICAV governed by Belgian law and managed by Luxellence Management S.A.



Our philosophy

Econopolis' long-term success is based on trust and conviction. **Corporate sustainability is a prerequisite for maintaining this trust**. This document lays down the principles for how Econopolis **ensures the long-term sustainability of its operations, strengthening long-term relationships with our clients and our contribution to a greater good**. This charter also aims to support Econopolis and its employees in carrying out their work and making decisions. It contains both general principles and specific criteria applicable to the relevant portfolios.

Key principles

For Econopolis, **sustainability means taking responsibility for the impact we have on our environment**. It includes the ability to be a credible and trustworthy partner, acting in the interests of clients and ethically and responsibly towards society. Human rights, employee rights, environmental responsibility and anti-corruption are included in our decision-making processes to contribute to healthy financial markets. Sustainability is at the core of our daily activities and a way to create value.

The sustainability principles below are based on Econopolis' Code of Conduct and guide our behaviour in our daily work and when making business decisions. We take these principles and other relevant environmental, social and governance (ESG) principles into account when evaluating business risks and opportunities. Econopolis also expects its business partners and suppliers to adhere to these principles.

Econopolis has signed the **United Nations Principles for Responsible Investment (UN PRI)**. This demonstrates our endorsement of the six UN PRI principles for integrating ESG issues into investment practice.

PRI | Principles for Responsible Investment

- ✓ We are committed to corporate social responsibility
- ✓ We are committed to human rights, labour rights and freedom
- ✓ We are committed to equal opportunities and diversity
- ✓ We are committed to the welfare of our employees
- ✓ We are committed to ethics, honesty and fairness
- ✓ We care for the environment
- ✓ We reject any form of bribery and corruption

Sustainability beyond investment

As an asset manager, **we believe that sustainability goes far beyond the investment sphere** and should be embedded throughout the organisation and in day-to-day operations. We pride ourselves on demonstrating excellent sustainable and ethical business results:

Every employee signed our Integrity Policy, which is our deontological, moral and ethical code.

Employees are encouraged to contribute to reducing Econopolis' environmental impact.

Econopolis has endorsed the principles of the UNPRI for years.

Responsible investment policy

The responsible investment policy of the Econopolis Investi EcoVi DBI/RDT sub-fund applies to both direct and indirect investments (e.g. through other investment funds).

The sub-fund's responsible investment policy is based on four different strategies. Together, these strategies provide the necessary confidence that investments are made responsibly. In addition to these four strategies, Econopolis also **takes clearly defined positions on controversial activities.**

Negative selection
Some companies do not belong in a responsible investment portfolio. Therefore, we use specific negative selection criteria to filter out these companies. To achieve this, we follow the Norwegian Government Pension Fund Global's exclusion list.

Norms-based screening
The themes employed in our investment strategy are based on the book 'Econoshock' by our founder Geert Noels. In practice, this means that we assess companies based on whether they comply with the 10 principles of the UN Global Compact. We also apply the World Bank/ IFC activity-based exclusion list and the OECD Guidelines for Multinational Enterprises.

ESG Integration
We integrate ESG factors into our investment decisions. To complement our own analysis and take an objective view, we have a long-standing partnership with Sustain-alytics, a world leader in independent ESG research. Sustainalytics' research and resulting ESG risk ratings are designed to help investors identify and understand financially material ESG risks.

Best-in-universe selection
Based on Sustainalytics' ESG Risk Rating methodology, we apply a best-in-universe selection strategy. Only issuers whose ESG Risk Rating is among the best 75% of the entire universe are eligible for this strategy. In addition, we exclude companies that have been involved in serious controversial incidents as measured by Sustainalytics' Con-troversy Score.

Views on controversial activities
As a responsible investor, we expect companies in our portfolio to act in line with our commitment to the UN PRI and in compliance with existing laws and regulations, international humanitarian law and international treaties, as well as standards of good environmental, social and governance performance. We have defined clear positions on a range of controversial activities.

Exclusions

Norwegian Government Pension Fund Global is one of the world's largest sovereign wealth funds, with assets of more than US$1 trillion, and is **widely regarded as a leader in sustainability.**

The Norwegian Pension Fund publishes clear expectations from the companies in their portfolio regarding global challenges in both governance and sustainability. Furthermore,

the Norwegian Ministry of Finance has issued **specific guidelines for succession and exclusion**. These criteria cover specific product types and mean that the fund may not invest in companies that themselves, or through entities they control, produce weapons that violate fundamental humanitarian principles through their normal use, produce tobacco, or sell weapons or military equipment to certain countries. Companies may also be excluded if there is an unacceptable risk of behaviour considered highly unethical.

All companies on the Norwegian Pension Fund's exclusion list are also excluded for the sub-fund. The full list of companies can be found at https://www.nbim.no/en/the-fund/responsible-investment/exclusion-of-companies/

Norms-based screening

Econopolis was founded on the basis of the book "Econoshock" by our founder Geert Noels. Our responsible investment standards are therefore also influenced by this book. To implement our standards-based strategy, companies that do not comply (structurally, repetitively and seriously) with the **10 Principles of the UN Global Compact (UNGC)** are not eligible for investment. The same applies to the **OECD Guidelines for Multinational Enterprises.**

Companies involved in activities on the **activity-based exclusion list of the International Finance Corporation**, a subsidiary of the World Bank, are also ineligible for investment. These activities are not in line with our own responsible investment standards, which we intend to maintain at all times. The full list of activities can be found at https://www.ifc.org/exclusionlist.

Positions

We set clear expectations for the ESG management of companies in our investments and communicate these expectations to companies in which we invest and other stakeholders. We expect companies we invest in to act in line with our commitment to the UN PRI and in compliance with existing laws and regulations, international humanitarian law and international treaties, as well as standards of good environmental, social and governance performance. We have clearly defined positions in the following areas:

Human and labour rights
We expect companies to comply with internationally recognised human rights and to prevent and manage any negative impact on human rights. Human rights issues include complicity in human rights violations, modern slavery and child labour, occupational health and safety, the rights of indigenous peoples and displacement of local communities, freedom of association and collective bargaining, and international humanitarian law. Econopolis does not invest in companies that do not comply with the UNGC principles on human and labour rights.

Weapons
In accordance with the law of 8 June 2006, last amended on 16 July 2009, Econopolis does not invest in companies with weapons-related activities that may not be financed in Belgium (cluster munitions, anti-personnel mines, ammunition and armour containing depleted uranium, biological, che-mical, or nuclear weapons, white phosphorus, etc.). Furthermore, Econopolis does not invest in companies where more than 5% of the revenues come from the production or trade of weapons/munitions or custom-made components thereof, as we consider these activities to be highly controversial given their disproportionate impact on human populations.

Tobacco
Econopolis does not invest in companies actively (>5%) manufacturing or wholesaling tobacco products or e-cigarettes, as we are concerned about the impact of these products on the health and well-being of society.

Adult entertainment / Pornography
Econopolis does not invest in companies active in the production or distribution of pornography or adult entertainment. We consider this sector highly controversial given their likely negative impact on society. Moreover, companies operating in this sector are likely to fail to comply with human rights principles (e.g. the UNGC labour principles).

Gambling
Econopolis does not invest in companies that derive a significant part of their income (>5%) from gambling products or services (incl.

casinos). We consider these activities highly controversial, given the potential impact they may have on players and their environment and society in general (e.g. addiction problems, risk of personal bankruptcy and so on).

Alcohol
Econopolis does not invest in companies that derive a significant part of their income (>10%) from the production of or trade in alcohol (excluding beer and wine), given the potential impact on the health and well-being of individuals, and society in general (addiction problems, chronic diseases, traffic accidents and so on).

Fur
Econopolis does not invest in companies that derive a significant part of their income (>5%) from the production of or trade in fur products. We consider this activity highly controversial given their impact on animal welfare.

Speciality leather
Econopolis does not invest in companies that derive a significant part of their income (>10%) from the production of or trade in "speciality leather". We consider these activities highly controversial given their impact on animal welfare.

Asbestos
Econopolis does not invest in companies active in the extraction or production of asbestos fibres. Asbestos is banned in more than 50 countries today. It has been proven that asbestos can cause serious diseases (including cancer) and thus has a clear significant negative impact on society.

Unconventional oil & gas
Econopolis does not invest in companies active in the exploration or extraction of unconventional oil and gas (extracted by methods other than traditional production methods). This includes, among others: the extraction of tar sands oil, coal bed methane, extra-heavy oil and Arctic oil & gas, as well as oil & gas from methods such as fracking or ultra-deep drilling. These activities pose unacceptable risks to the environment (including water use, pollution, energy-intensive) and are thus excluded from investment.

Conventional oil & gas
Econopolis does not invest in companies engaged in the exploration, extraction or refining (except from oil to chemicals) of conventional oil and gas resources or the transportation of oil. We consider these activities to contribute negatively to climate change.

Coal
Econopolis does not invest in companies engaged in the exploration, mining, extraction, distribution, refining or transportation of thermal coal. We consider these activities incompatible with a sustainable future and contributing to global warming because of the carbon intensity of electricity generation from coal.

Electricity generation
Econopolis does not invest in power plants with a carbon intensity not aligned with a scenario of less than 2 degrees (OECD Paris Agreement). This means that in 2021, the maximum gCO2/kWh is 393. In 2022 it will be 374, in 2023 354, in 2024 335 and in 2025 315.

Nuclear power
Econopolis understands the temporary role of nuclear power in the energy mix to switch to a low-carbon energy supply, but is aware of the safety concerns and environmental impact of nuclear waste. Therefore, companies operating in the nuclear energy sector can only be included in Econopolis' universe if they meet the following criteria;

- *The company's absolute production and/or capacity to provide products/services is increasing.*

- *The company must meet at least one of the following criteria;*
- *Have an SBTi target of well below 2°C or 1.5°C, or have an SBTi business ambition for 1.5°'.*
- *Obtain more than 50% of its revenue from contributing activities*
- *spend more than 50% of its capital expenditure on contributing activities.*
- *Contributing activities are activities included in the EU taxonomy, with the exception of the following activities;*
- *4.27 Construction and safe operation of new nuclear power plants for the generation of electricity or heat, including hydrogen production, using best available technologies*
- *4.28 Generation of electricity from nuclear energy in existing plants*
- *4.29 Electricity generation from fossil gaseous fuels*
- *4.30 High-efficiency cogeneration using fossil gaseous fuels*
- *4.31 Production of heat/cold from fossil gaseous fuels in an efficient district heating and cooling system*

Biofuels

Companies operating in biofuel-based energy production are also expected to meet the below-2-degree scenario described above in the section on power generation to be eligible for investment.

The impact of palm oil on deforestation and biodiversity.

Econopolis does not invest in companies producing palm oil, regardless of the Roundtable for Sustainable Palm Oil (RSPO) certification rate. We note that palm oil production is associated with a range of environmental, social and governance related problems. These include deforestation, biodiversity, rights of local communities, working conditions and rights of indigenous peoples.

Gender & diversity

Management of key gender & diversity issues are an integral part of Sustainalytics' ESG Risk Rating, as well as the Sustainalytics Controversy Score.

Water consumption

Water consumption is not currently embedded with specific criteria in our investment process due to the lack of consistent data. Nevertheless, it is taken into account in both the assessment of the independent non-financial rating agency Sustainalytics and our stance on controversial activities. For example, the water-intensive extraction process of shale gas is an important reason why unconventional oil & gas companies are excluded from our investment universe.

Taxes

The ability and willingness of issuers to pay taxes, and whether this is transparent and complies with applicable tax laws, is factored into the ESG analysis of issuers, both by our internal analysts and by the independent non-financial rating agency Sustainalytics (including through its Controversy Score for which we have specific criteria, as described later in this document).

Oppressive regimes

Econopolis does not invest in government bonds issued by governments that are subject to broad sanctions and do not respect human rights. More details on our responsible investment policy on government bond investments can be found further in this document.

Agricultural products

Econopolis does not invest in derivative contracts on agricultural products. The impact of food speculation on volatility and prices poses an unacceptable risk to local farmers and poorer populations.

Death penalty

A country's attitude towards the death penalty is integrated into the ESG analysis and country risk assessment calculated by the independent non-financial rating agency Sustainalytics.

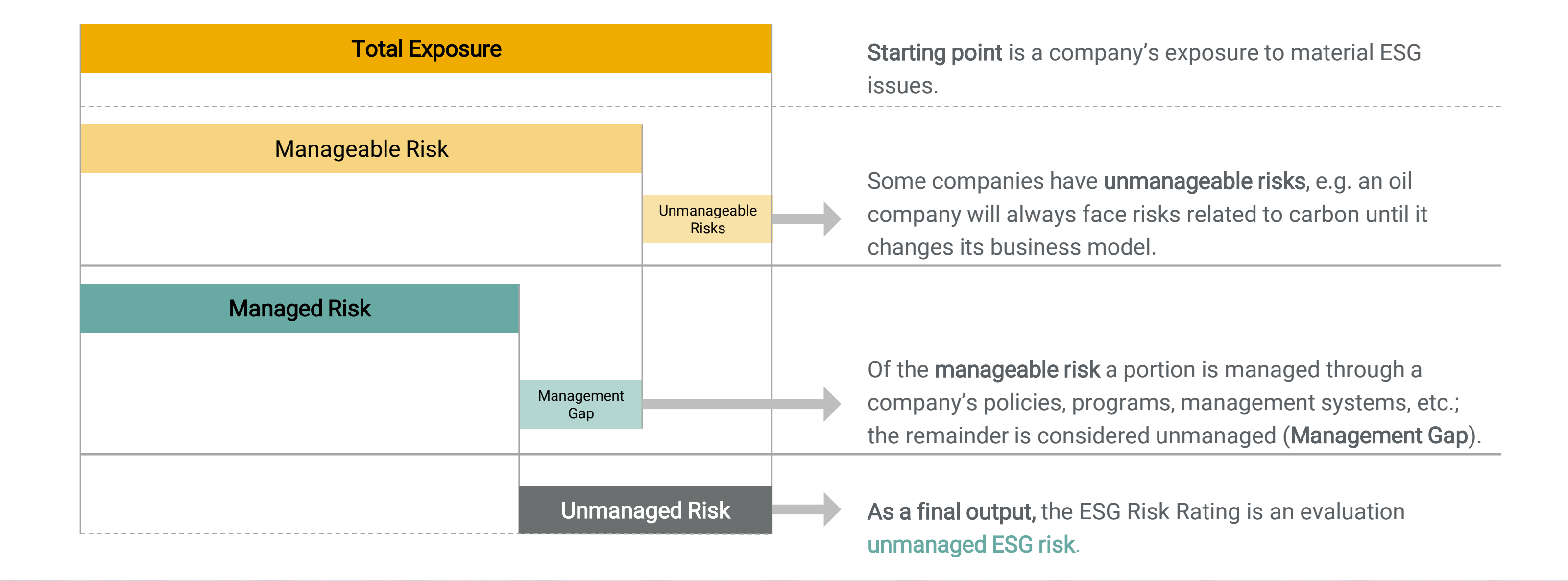
Pollution & Waste

An issuer's pollution and waste policy and behaviour is included in both the ESG Risk Rating and Controversy Score, which are calculated by the independent non-financial rating agency Sustainalytics.

Only corporate issuers with an ESG Risk Rating among the top 75% of the entire Sustainalytics universe are eligible for the portfolio*.

The average Sustainalytics ESG Risk Rating of the portfolio must be below 30.

Corporate issuers with a Sustainalytics Controversy Score higher than 4 are not eligible for the portfolio*.



Companies are ranked in **5 categories** based on their ESG risk rating.

- Negligible Risk: ESG Risk Rating between 0 and 10
- Low Risk: ESG Risk Rating between 10 and 20
- Average Risk: ESG Risk Rating between 20 and 30
- High Risk: ESG Risk Rating between 30 and 40

Insourcing first-class expertise

Sustainalytics' ESG Risk Rating measures companies' exposure to and management of material ESG issues. The rating measures and counts both unmanaged risks (management gap) and unmanageable risks related to a company's sector, for example. An ESG issue is considered material if the company is sufficiently exposed to it. Corporate governance is considered material for all companies.

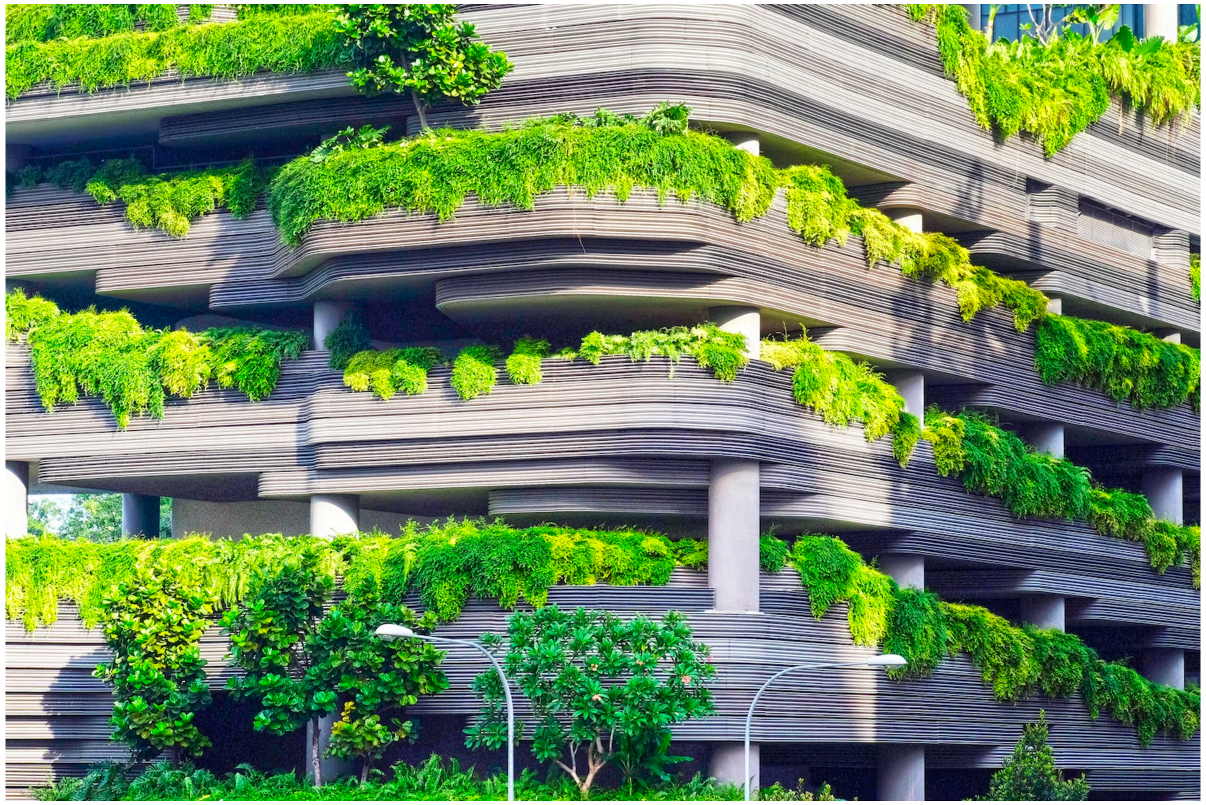
Sustainalytics' Controversy Score identifies and assesses companies' involvement in incidents that may have a negative impact on stakeholders, the environment or the company's operations. The Controversy Score ranges from 0 (no controversies) to 5 (serious impact).

More information on the methodology of the ESG Risk Rating and the Controversy Score can be found on the website (www.sustainalytics.com).

*To enable **our own view on sustainable issues,** we allow up to 20% of the portfolio to consist of companies that are not in line with Sustainalytics ratings or exclusion lists, subject to acceptance by the investment committee.

Sustainable investments within the meaning of SFDR

EcoVi DBI/RDT is classified as a fund under Article 8 of SFDR and thus **promotes environmental and/or social characteristics**. In the case of EcoVi DBI/RDT, it promotes climate change mitigation and several social characteristics. No benchmark has been designated for the achievement of the environmental or social characteristics promoted by the sub-fund. The sub-fund does not have sustainable investments as a target, but **aims for at least 40% sustainable investments in its portfolio.**



Definition of sustainable investments (within the meaning of SFDR). Sustainable investments are investments in an economic activity that contributes to an environmental and/or social objective, provided that the investment does not significantly harm an environmental objective and that the investee companies follow good governance practices.

"Do no significant harm" Principle and good governance practices

An investment can only be sustainable if it does no significant harm to E/S objectives and if the investee companies follow good governance practices. To this end, before a security is included in the investable universe, the investment committee makes a qualitative and quantitative assessment of the company's strategies and activities. This assessment is based on, among other things, the ESG policy described in this document, taking into account risk scores, controversy scores, country scores, investments in controversial activities and exclusion lists.

Proportion sustainable investments

The sustainable objective of the sustainable investments in the sub-fund is to contribute to climate change mitigation by helping to keep the maximum global temperature increase well below 2°C. The sustainable investments contribute to the objectives by being the best-in-universe based on scope 1 and 2 emissions. The issuer must therefore be among the 33% best-performing companies in terms of scope 1 and 2 emissions in the universe.

Investment objective

The sub-fund invests in equity and other equity securities of companies operating in developed markets (such as, but not limited to, Europe, the U.S. and Japan), and may also invest in companies operating in emerging markets. The universe of the sub-fund is designed to select companies whose business model is focused on providing solutions or parts of solutions to, or that have adapted their business model to the increasing challenges of, climate change.

Risk score

To enable you, as a potential investor, to correctly assess the risk of this investment, you can consult the risk score. However, the risk category is determined based on simulated data and may not be a reliable indication of the future risk profile .

Risico-indicator

Kleiner risico, doorgaans lager rendement — Groter risico, doorgaans hoger rendement

1	2	3	**4**	5	6	7

Technical data sheet

Name	Econopolis EcoVi Equities DBI/RDT
ISIN	Distribution (class A): BE6329978496 Distribution (class I): BE6329980518
Currency	Euro
Term	Unlimited, minimal horizon of 5 years
Minimum entry fee	No
Entry fee	Max 3,00%
Exit fee	Max 3,00%
SFDR-classification	Article 8 fund in which ESG characteristics are promoted
Stock market exit fee	0%
Withholding tax	Dis.: 30% on dividends received. For corporations, withholding tax is 100% tax deductible
Running cost*	Expenses withdrawn from the sub-fund during one year: 1,17% for retail A class
Annual storage cost on investments	0,02%
Frequency of net asset value	Net asset value is calculated daily

*The running costs indicated are an estimate based on total estimated running costs. That figure may vary from year to year.

Investing is not without risk

Possible risks

- **Foreign exchange risk:** As the Fund invests in equities in global markets, the net asset value may be affected by exchange rate fluctuations of securities in portfolios denominated in currencies other than the Fund's currency.
- **Equity risk**: Risks related to the fluctuation of the share price.
- **Market risk:** Market risk is high because the Fund invests primarily in equities in accordance with its investment policy. These portfolio positions are subject to the risk of loss or devaluation.
- **Sustainability risk:** It refers to an event or situation related to ESG, which, if it occurs, could have a significant negative impact, actual or potential, on the value of one or more investments held by the Fund. As a result of incorporating ESG criteria into investment decisions, the Fund may underperform the market as a whole if its investments underperform the market and/ or underperform other funds that do not use ESG criteria in selecting investments and/or the Fund may be forced to sell investments that would otherwise perform well for. ESG-related reasons.
- **Emerging markets**: Under certain circumstances, underlying investments may become illiquid, which may limit the Fund Manager's ability to sell all or some of the portfolio shares. These investments involve greater operational and political risks and the likelihood of adverse economic conditions.
- **Frontier markets**: For these investments, the legal, judicial and regulatory infrastructure is still evolving, creating significant legal uncertainty for both local market participants and their foreign counterparts. The difference between frontier markets and emerging markets is that frontier markets are considered somewhat less economically developed than emerging markets.

There may also be other risk factors for an investor to consider in relation to their own situation and specific present and future circumstances. Before your investment manager can allow you to invest in this product, they will assess, on the basis of a questionnaire, whether the proposed transaction is suitable for you, taking into account your knowledge and experience with this product, your savings or investment objectives, needs and desires, and your financial situation.

Important information

The current prospectus (EN), the key investor information (NL), and the latest audited annual report of the SICAV (as well as the latest semi-annual report) can be obtained free of charge from Econopolis Wealth Management NV, Sneeuwbeslaan 20, bus 12, 2610 Wilrijk, Belgium or at www.econopolis.be.

These documents should be read before registration

The value of this product will be consultable on the website of BEAMA: http://www.beama.be/nl

Contact

Publisher responsible: Econopolis Wealth Management NV, Sneeuwbeslaan 20, bus 12, 2610 Wilrijk - BE 0812 127 055

Complaints:

- Econopolis Wealth Management NV, Sneeuwbeslaan 20, bus 12, 2610 Wilrijk, Attn. the Compliance Officer.
- Ombudsman in financial disputes, Ombudsfin VZW - North Gate II - Koning Albert **II**-laan 8 bus 2 - 1000 Brussels, e-mail: ombudsman@ombudsfin.be.