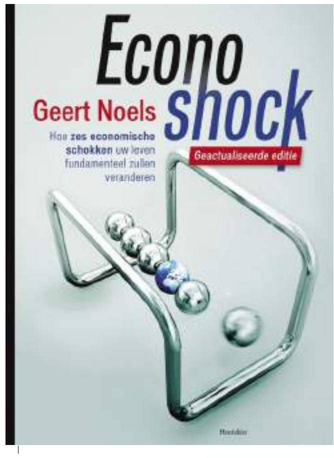
January 2024

Econopolis Fixed Maturity

ESG policy

Econopolis Fixed Maturity is a Sub-Fund of Econopolis Funds, a SICAV laws of the Grand Duchy of Luxembourg, that is managed by Conventum TPS. The investment policy is delegated to Econopolis Wealth Management NV (hereinafter "Econopolis").



Our philosophy

Econopolis' long-term success is based on trust and confidence. **Sustainable business is a prerequisite to uphold trust and confidence**. This document sets the principles for how Econopolis ensures long-term sustainability of its operations, and by doing so **strengthening long-term relationships with our customers and our contribution to a greater good**. This charter also aims to support Econopolis and its employees in performing their work and decision-making. It contains both general principles and specific criteria that apply to the relevant investment portfolios.

Core principles

For Econopolis, **sustainability means taking responsibility for the impact we have on our surroundings**. It encompasses the ability to be a credible and reliable partner, which acts in the best interest of customers and ethically and responsibly towards society. Human rights, employee rights, environmental responsibility and anticorruption are included in our decision-making processes in order to contribute to sound financial markets. Sustainability is at the core of our day-to-day activities, and a way of creating value.

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

PRI Principles for Responsible Investment

Econopolis is a signatory of the **United Nations Principles for Responsible Investments (UN PRI)**, demonstrating that we are committed to the six UN PRI principles for incorporating ESG issues into investment practice.

- ✓ We are committed to good corporate citizenship
- ✓ We are committed to human rights, labour rights and freedom
- ✓ We are committed to equal opportunities and diversity
- ✓ We are committed to caring for the wellbeing of our employees
- ✓ We are committed to ethics, honesty and sincerity
- ✓ We are committed to caring for the environment
- ✓ We reject any form of bribery and corruption

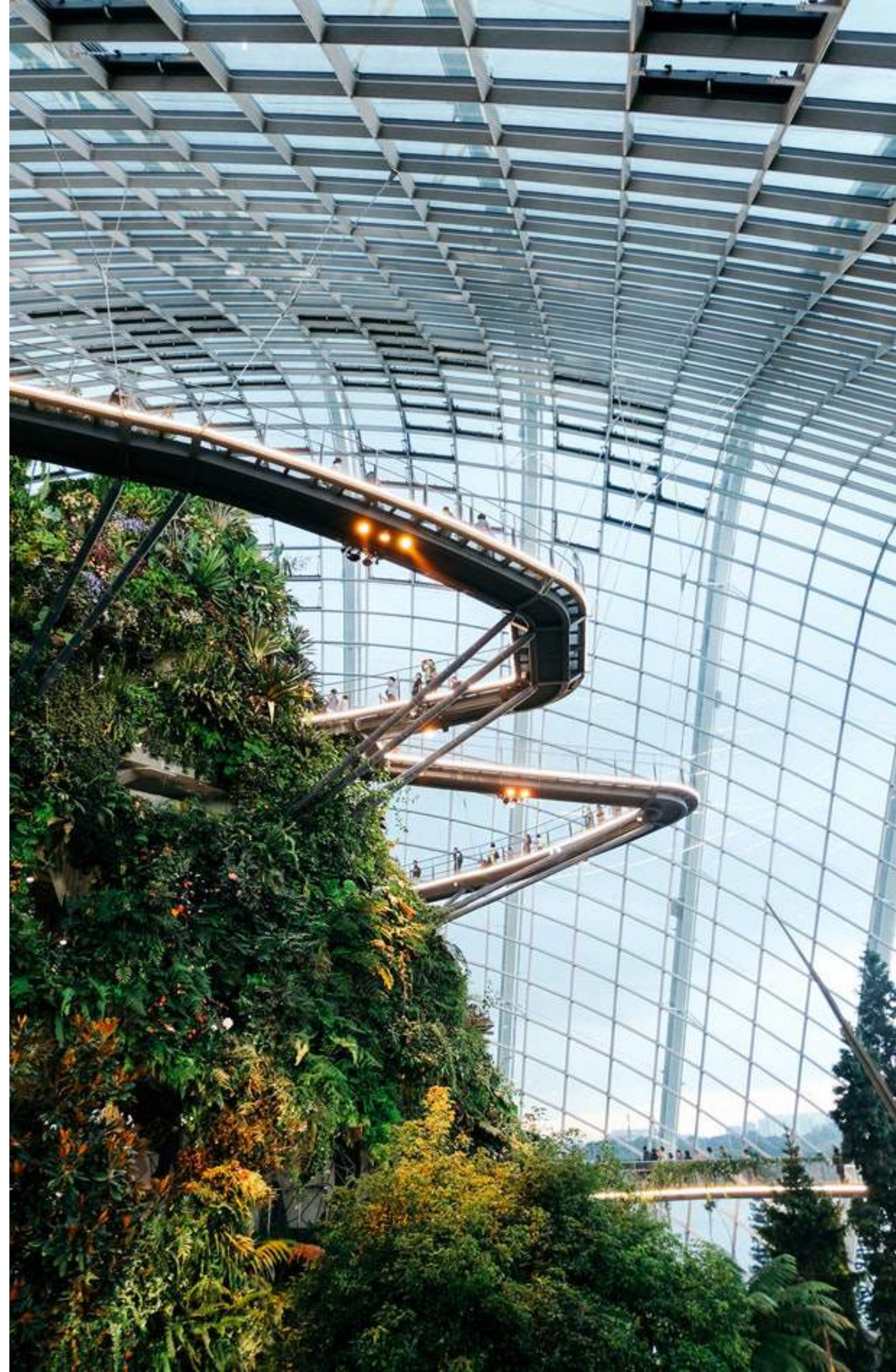
Sustainability beyond investing

As an asset manager, **we believe sustainability goes far beyond the investing sphere** and should be embedded in the whole organisation and in its day-to-day business. We are proud to be able to showcase excellent sustainable and ethical business results:

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

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

Econopolis has subscribed to the principles of UNPRI.



Responsible investing policy

The responsible investment policy of Econopolis Fixed Maturity covers both direct and indirect investments (e.g. via other investment funds).

The responsible investing policy of Econopolis Euro Bond Opportunities sub-fund is **based on four different sustainable strategies**. Together, these strategies offer investors the necessary confidence that their investments are made in line with our principles regarding sustainable investing. On top of these four strategies, **Econopolis also takes clearly defined positions regarding controversial activities**. The four strategies and our positions regarding these controversial activities are briefly outlined below and are discussed in more detail on the next few pages.

Negative selection
Some companies do not have a place in a sustainable investment portfolio. Therefore, we apply specific negative selection criteria to filter out these companies. In order to achieve this, we follow the exclusion list of the Norwegian Pension Fund.

Norms-based screening
Our norms-based sustainable investment strategy is based on the book "Econoshock" by our founder Geert Noels. In practice, this implicates that we assess companies based on whether they uphold the 10 Principles of the UN Global Compact. Furthermore, we follow the activity-based exclusion list of the World Bank/IFC.

ESG Integration
We integrate ESG-factors in our investment decisions. We take into account our commitment to the UN PRI and incorporate ESG-factors in our analysis and decision making. To supplement our own analysis and have an objective viewpoint, we have a long-standing partnership with Sustainalytics, a global leader in independent ESG research. The research of Sustainalytics and consequent ESG Risk Ratings are designed to help investors identify and understand financially material ESG risks.

Best-in-universe selection
Based on the ESG Risk Rating methodology of Sustainalytics, we apply a best-in-universe selection strategy. Only issuers of which the ESG Risk Rating is part of the best 75% of the whole universe are eligible for this strategy. Furthermore, we exclude companies implicated in severe controversial incidents as measured by the Controversy Score of Sustainalytics.

Positions regarding controversial activities
As a responsible investor, we expect that invested companies operate in line with our commitment to the UN PRI and in observance of existing laws and regulations, international humanitarian law and international conventions, as well as standards for sound environmental, social and governance performance. We have clearly defined positions regarding a range of controversial activities.

Sovereign bond investments
Specific criteria for sovereign bond investments in the sub-fund are based on the Country Risk Rating of Sustainalytics. As for other investment products, they are also applied on a look-through basis where applicable.

Exclusions

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

The fund publishes clear expectations of the companies in their portfolio regarding global challenges in both governance

and sustainability. Furthermore, the Norwegian Ministry of Finance has issued specific **Guidelines for Observation and Exclusion**. These criteria relate to specific product types and entail that the fund must not invest in companies which themselves, or through entities they control, produce weapons that violate fundamental humanitarian principles through their normal use, produce tobacco, or sell weapons or military material to certain countries. Companies may also be excluded if there is an unacceptable risk of conduct that is considered grossly unethical.

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

Norms-based screening

Econopolis is founded based on the book "Econoshock" by our founder Geert Noels. Our norms regarding sustainable investing are thus also influenced by this book. To implement our norms-based strategy in practice, companies involved in violations (structural, repetitive and severe) of the **10 Principles of the UN Global Compact (UNGC)** are not eligible for investment. The same applies for 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 not eligible for investment. These activities are not in alignment with our own norms regarding sustainable investing, which we wish to uphold at any time. The full list of activities can be found on https://www.ifc.org/exclusionlist.

Positions

We set clear expectations on corporate ESG management in our investments and communicate these expectations to companies we are invested in and other stakeholders. We expect that invested companies operate in line with our commitment to the UN PRI and in observance of existing laws and regulations, international humanitarian law and international conventions, as well as standards for sound environmental, social and governance performance. We have clearly defined positions within the following areas:

Human and Labour Rights
We expect companies to obey internationally recognised human rights principles and to prevent and manage their impact on human rights. Human rights related issues include complicity in human right abuses, modern slavery and child labour, occupational safety and health, the rights of indigenous people and displacement of local communities, freedom of association and collective bargaining and international humanitarian law. Econopolis does not invest in companies not complying with the UNGC principles related to human and labour rights.

Weapons
In accordance to the law of June 8 2006, last modified on July 16 2009, Econopolis does not invest in companies with weapons-related activities that cannot be financed in Belgium (cluster munitions, anti-personal mines, depleted uranium munitions and armours, nuclear/chemical/biological weapons, white phosphorus, etc.). On top of this, Econopolis does not invest in companies of which more than 5% of the revenues result from the production or trade in weapons/munition or tailor-made components thereof as we see these activities as highly controversial given their indiscriminate effect on human populations.

Tobacco
Econopolis does not invest in companies active (>5%) in the production or wholesale trading of tobacco products or e-cigarettes, as we are concerned with the impact of these products on the health and wellbeing of society.

Adult entertainment / Pornography
Econopolis does not invest in companies active in the production or distribution of adult entertainment / pornography. We view this sector as highly controversial given their suspected adverse impact on society. Furthermore, there is a significant probability that companies active in this sector fail to comply with human rights principles (e.g. labour principles of the UNGC).

Gambling
Econopolis does not invest in companies deriving a significant part of their revenues (>5%) from gambling products or services (incl. casinos). We view these activities as highly controversial, given the potential impact these can have on the players and their surroundings and society in general (e.g. addiction issues, risk of personal bankruptcy et cetera).

Alcohol
Econopolis does not invest in companies deriving a significant part of their revenues (>10%) from the production or trade in alcohol (excluding beer and wine), giving the potential impact on the health and well-being of individuals, their surroundings and society in general (addictions issues, chronic diseases, traffic accidents et cetera).

Fur

Econopolis does not invest in companies deriving a significant part of their revenues (>5%) from the production or trade in fur products. We view these activities as highly controversial given their impact on animal welfare.

Speciality leather

Econopolis does not invest in companies deriving a significant part of their revenues (>10%) from the production or trade in specialty leather. We view these activities as highly controversial given their impact on animal welfare.

Asbestos

Econopolis does not invest in companies active in the extraction or production of asbestos fibres. Today banned in more than 50 countries, Asbestos has been proven to be able to cause serious illness (a.o. cancer) and has thus 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 (obtained through methods other than traditional production methods). This a.o. includes: the extraction of tar sands oil, coalbed methane, extra heavy foul 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 (a.o. water use, pollution, energy intensive) and are thus excluded from investments.

Conventional oil & gas

Econopolis does not invest in companies active in the exploration, extraction, or refinement (except oil to chemicals) of conventional oil & gas energy sources or the transportation of oil. We view these activities as negatively contributing to climate change.

Coal

Econopolis does not invest in companies active in the exploration, mining, extraction, distribution, refinement or transportation of thermal coal. We view these activities as incompatible with a sustainable future and contributing to global warning because of the carbon intensity of generating electricity from coal.

Electricity generation

Econopolis does not invest in electricity utilities with a carbon intensity that is not aligned with a below 2 degrees scenario (OECD Paris agreement). This means that in 2021, the maximum gCO2/kWh is 393. In 2022 it is 374, in 2023 354, in 2024 335 and in 2025 315.

Nuclear energy

Econopolis understands the temporary role of nuclear energy in the energy mix to shift to a low-carbon energy supply but is aware of the safety concerns and the environmental impact of nuclear waste. Therefore, companies active in the nuclear energy sector can only be included in Econopolis' universe when it meets the following criteria;

- *The company's absolute production and/or capacity for contributing products/services shall be increasing.*

- *The company shall meet at least one of the following criteria;*
  - *Have an SBTi target set at well-below 2°C or 1.5°C, or have a SBTi Business Ambition for 1.5°' commitment*
  - *Derive more than 50% of its revenues from contributing activities*
  - *Have more than 50% of its CapEx dedicated to contributing activities*

Contributing activities are activities included in the EU taxonomy except for the following activities;

- *4.27 Construction and safe operation of new nuclear power plants, for the generation of electricity or heat, including for hydrogen production, using best-available technologies*
- *4.28 Electricity generation from nuclear energy in existing installations*
- *4.29 Electricity generation from fossil gaseous fuels*
- *4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels*
- *4.31 Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system*

Biofuels

Companies active in energy production based on biofuels are also expected to be in line with the below 2 degrees scenario as described above in the paragraph regarding electricity generation in order to be eligible for investments.

Palm oil's impact on deforestation and biodiversity

Econopolis does not invest in companies producing palm oil, regardless of the percentage of certification from the "Roundtable for Sustainable Palm Oil (RSPO)". We find that palm oil production is associated with a range of environmental, social and governance issues. These include a.o. deforestation, biodiversity, local community rights, labour conditions and the rights of indigenous people

Gender & diversity

The management of key gender & diversity issues are an integral part of both Sustainalytics' ESG Risk Rating and its Controversy Score.

Water use

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

Taxation

The ability and willingness of issuers to pay taxes, and whether this is transparent and complies with applicable tax regulations, is taken into account in the ESG analysis of issuers, both by our internal analysts and the independent non-financial rating agency Sustainalytics (a.o. via its Controversy Score on which we have specific criteria as detailed further in this document).

Oppressive regimes
Econopolis does not invest in sovereign bonds issued by governments which are subject to broad sanctions and fail to respect human rights. Further details regarding our responsible investing policy towards sovereign bond in-vestments are provided later in this document.

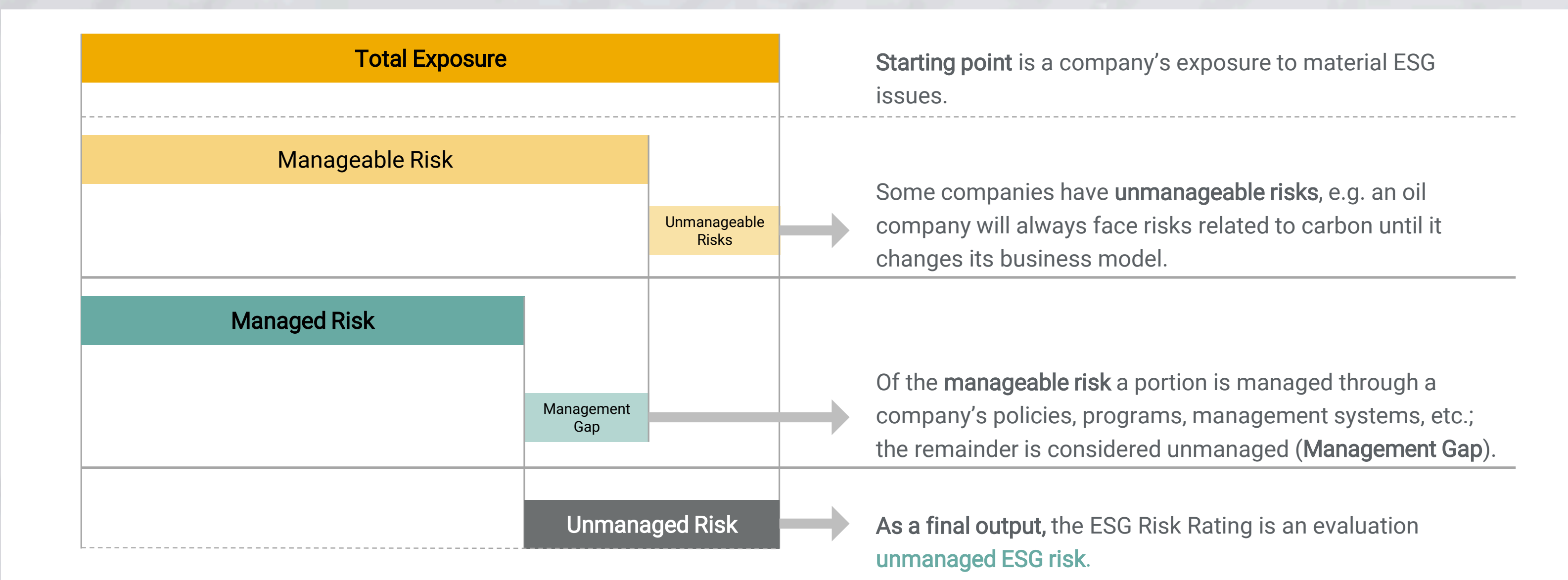
Agricultural commodities
Econopolis does not invest in derivative contracts on agricultural products. The impact of food speculation on volatility and prices poses an unacceptable risk for local farmers and poorer populations.

Death penalty
A country’s stance on the death penalty is integrated in the ESG analysis and Country Risk Ratings calculated by the independent non-financial rating agency Sustainalytics. As detailed later in this document, we apply an ESG filter based on these Country Risk Ratings for sovereign bond investments.

Pollution & waste
An issuer’s policy's and behaviour towards pollution & waste is integrated in both the ESG Risk Rating and Controversy Score calculated by in-dependent non-financial rating agency Sustainalytics.

SUSTAINALYTICS

- Only corporate issuers with an ESG Risk Rating part of the best 75% of the whole Sustainalytics universe are eligible for the portfolio*.
- The average Sustainalytics ESG Risk Rating of the portfolio needs to 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 ranging between 0 and 10
- Low Risk: ESG Risk Rating ranging between 10 and 20
- Medium Risk: ESG Risk Rating ranging between 20 and 30
- High Risk: ESG Risk Rating ranging between 30 and 40
- Severe Risk: ESG Risk Rating larger than 40

Insourcing first-class expertise

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

Sustainalytics' controversy research identifies and rates companies' involvement in incidents that may negatively impact stake-holders, the environment or the company's operations. The Controversy Score varies from 0 (no controversies) to 5 (severe impact).

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

*In order to allow **our own take on sustainable issues**, we allow maximum 10% of the portfolio to consist of companies with an inadequate Sustainalytics rating if accepted by the committee. The portfolio can also invest 10% of its assets in companies not rated by Sustainalytics.

SUSTAINALYTICS

Country Risk Rating

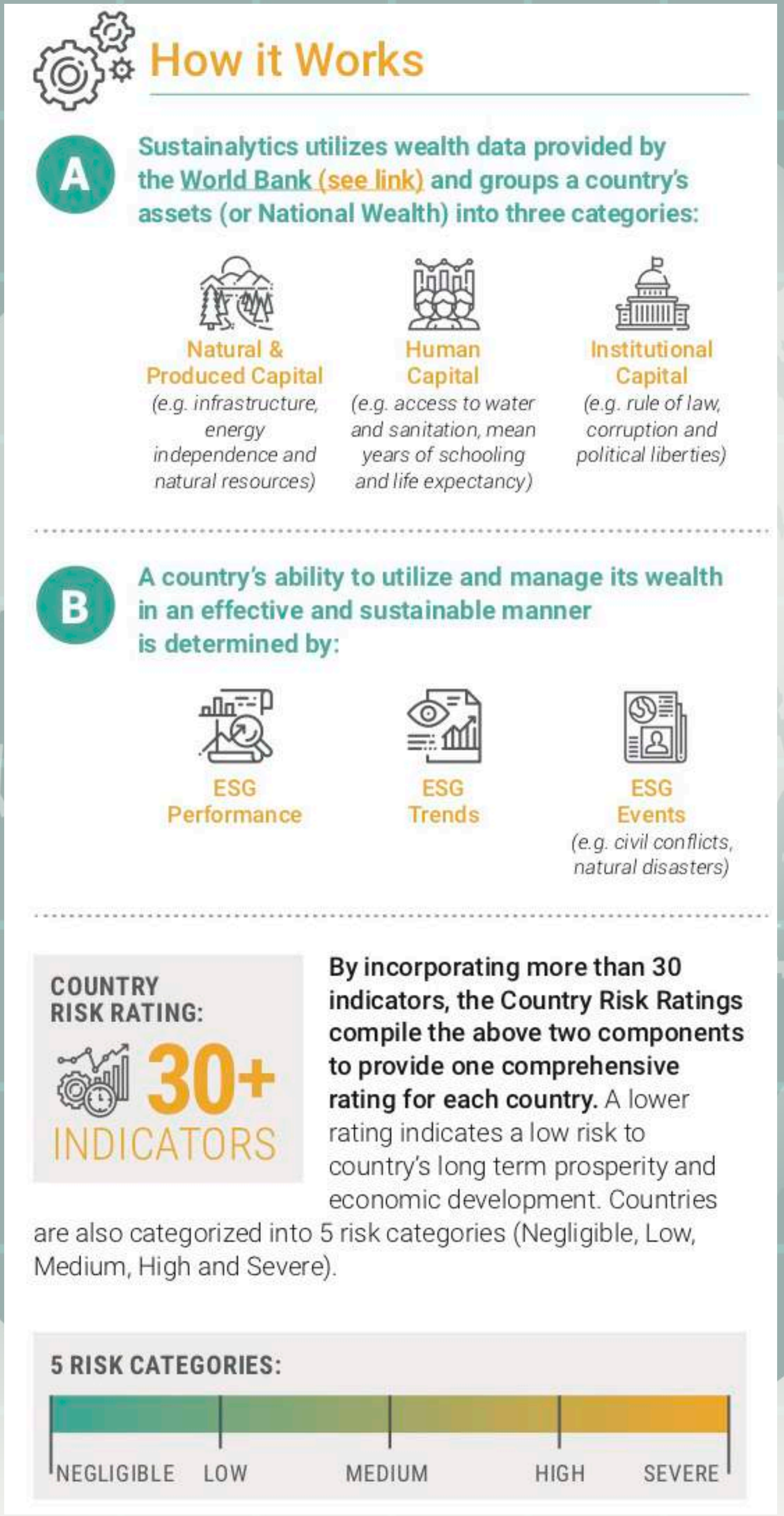
The Country Risk Rating of Sustainalytics measures **the risk to a country's long-term prosperity and economic development** by assessing how sustainably it is managing its natural, human and institutional assets.

Similar to their Risk Rating for companies, countries are ranked in **five categories** (Severe, High, Medium, Low and Negligible) based on their risk assessment.

Econopolis leverages Sustainalytics' capacities by **implementing specific criteria for all government bonds** in the portfolio.

- Countries with a Severe or High Country Risk Rating are excluded from government bond investments
- To allow our own take on sustainable issues, a limited number of countries (maximum 5) can have a Country Risk Rating of High Risk if accepted by the committee.

Both criteria combined **exclude more than 50 countries** from government bond investments (i.e. 30% of the global universe).



Sustainable investments under SFDR

Econopolis Fixed Maturity is classified as an **article 8 fund under SFDR** and thus **promotes environmental and/or social characteristics**. In the case of Econopolis EM Government Bonds, climate change mitigation and several social characteristics are promoted. No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the sub-fund. The sub-fund does not have as its objective sustainable investments, However, **the sub-fund does not aim for sustainable investments in its portfolio**, as this is still difficult to prove for government bonds today.

Definition sustainable investments (according to SFDR)
Sustainable investment means an investment in an economic activity that contributes to an environmental and/or social objective provided that the investment does not significantly harm any environmental objective and that the investee companies follow good governance.

“Do no significant harm” principle & good governance
For an investment to be sustainable, it mustn’t significantly harm any E/S objectives and the investee companies must follow good governance practices. To that end, before including a security to the investable universe, the investment committee makes a qualitative and quantitative assessment of company strategies and activities. This assessment is based, among others, on the ESG policy as outlined in this document, which takes into account Risk ratings, Controversy scores, Country scores, investments in controversial activities and exclusion lists.

Proportion of sustainable investments
The sustainable objective of the sustainable investments in the sub-fund is to contribute to climate change mitigation by contributing to keeping the maximum global temperature rise well-below 2°C. The sustainable investments contribute to the objectives by being best-in-universe based on scope 1 and 2 emissions. Thus, the corporate issuer must be part of the 33% best performers in terms of scope 1 and 2 emissions in the universe.