Econopolis

SFDR Statement

In case of any questions or comments, please contact info@econopolis.be.
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Summary

The Regulation on sustainability-related disclosures in the financial services sector (Regulation (EU) 2019/2088, “Sustainable Finance Disclosure Regulation,” "SFDR" or "the Regulation") entered into force on March 10, 2021. The Regulation requires asset managers and investment advisors such as Econopolis Wealth Management NV to disclose information regarding (among other things) the integration of sustainability risks, the consideration of negative sustainability impacts and, where applicable, the promotion of environmental or social characteristics, and sustainable investment in their investment policy and investment advice.

This document describes Econopolis's sustainability activities and can be divided into the following six chapters:

- Integrating sustainability risks into investment decisions and investment advice
- Principal adverse impact statement
- Remuneration policy in relation to the integration of sustainability risks
- Econopolis internal policies
- Engagement door Econopolis
- Key standards that Econopolis follows

Integrating sustainability into investment decisions and investment advice

Sustainability risks

Econopolis uses the definition of sustainability risks as described in Article 2 (22) of the Regulation: "an environmental, social or governance event or circumstance that, if it occurs, could have an actual or potential material adverse effect on the value of the investment. The main risks we identify as part of our sustainable investment policy include:

- Climate change and greenhouse gas emissions (CO_2 impact);
- Human rights violations and lack of diversity;
- Companies with governance problems or involvement in controversial practices;
- Governments with a low ESG score or a weak rule of law.

Indicators for measuring sustainability risks

Econopolis uses quantitative and qualitative ESG indicators through a partnership with Clarity AI, an independent ESG data provider. Two key indicators actively used for identifying and measuring sustainability risks are:

- **CO_2 emissions (scope 1 and 2 emissions):** To contribute to climate change mitigation, we monitor the CO_2 emissions of our investments.
- **Gender board diversity:** To promote inclusivity and better governance, we look at the proportion of women and men on the boards of directors of entities in which we invest or advise. The lower limit for board diversity depends on the average for the investment region.

Both indicators are used in our SFDR sustainability definition. They constitute core criteria for qualifying sustainable investments within the portfolio or in investment advice.

Integration of sustainability in investment decision-making and advisory processes
Econopolis aims to integrate sustainability risk assessment into its investment decision-making and portfolio management processes, as well as its investment advisory process, as described in more detail below.

To be included in the investment universe, Econopolis conducts screenings to identify and subsequently avoid investments that do not currently meet certain predefined ESG criteria. Econopolis's overall investment policy can be found on our website or via this link. A brief summary of the ESG criteria Econopolis uses in its investment policy is as follows:

- Reducing carbon emissions
- Reducing exposure to fossil fuels
- Transition to renewable energy
- Reduction of energy consumption
- Sensible use of water
- Exclusion of oppressive regimes
- Exclusion of corruption
- Exclusion of the tobacco industry
- Exclusion of the porn industry
- Exclusion of weapons-related activities
- Exclusion of the gambling industry
- Exclusion of the (strong) alcohol industry
- Exclusion of companies in the leather and fur industry
- Exclusion of companies active in the extraction or production of asbestos fibres
- Exclusion of companies active in the exploration, extraction, refining or transportation of conventional and unconventional oil and gas
- Exclusion of companies active in the exploration, extraction, extraction, refining, transportation or distribution of thermal coal
- Exclusion of electricity generation from non-renewable energy sources
- Exclusion of the palm oil industry
- Exclusion of derivatives contracts on agricultural products
- Fair tax regimes
- Compliance with human rights and labor rights

Main adverse impact statement (PAI statement)

A comprehensive PAI statement at the entity level, in accordance with Article 4 of the SFDR, is available at www.econopolis.be. This statement lists all the most significant adverse effects of investment decisions and investment advice on sustainability factors.

Remuneration policy in relation to the integration of sustainability risks

Econopolis's remuneration policy aims to align the interests of employees with those of investors and to avoid incentives that could lead to excessive risk-taking.

Sustainability is in Econopolis' DNA and is an essential part of the Ethical and Moral Code, which is signed by every employee.
All employees receive a fixed salary. In addition to the fixed salary, a limited variable remuneration may be awarded based on objective criteria that do not conflict with the client's interests. Sustainability factors are not a direct determining factor in the remuneration of Econopolis employees.

Internal policies

The internal policies relating to the ESG investment criteria and their monitoring are validated annually by the governing body.

Portfolio managers and investment advisors are responsible for complying with these criteria when making an investment decision or advising on an investment. The compliance and risk function is responsible for monitoring compliance with the internally established ESG criteria.

To select the companies in the portfolios or to advise on investments in such companies, internal analysis is used, as well as data provided by an external, independent supplier.

If no data is available on certain indicators, the company will either not be included in the portfolios/will not be advised on, or investor relations will be contacted to obtain additional information. See also the ESG policies at www.econopolis.be.

Engagement by Econopolis

Econopolis is committed to responsible investments through engagement activities with (potential) companies in its portfolio. This engagement is primarily aimed at mitigating risks and supporting value creation. Econopolis believes that encouraging companies to focus more on ESG issues will help.

In its engagement, Econopolis refers to both environmental factors and social and governance practices that could be improved. The extent to which Econopolis engages with companies depends on the likelihood of successfully communicating the concerns or ideas. In some cases, Econopolis will also make its voice heard at General Meetings of the companies in which it invests.

More details about the engagement initiatives Econopolis takes can be found in our engagement policy.

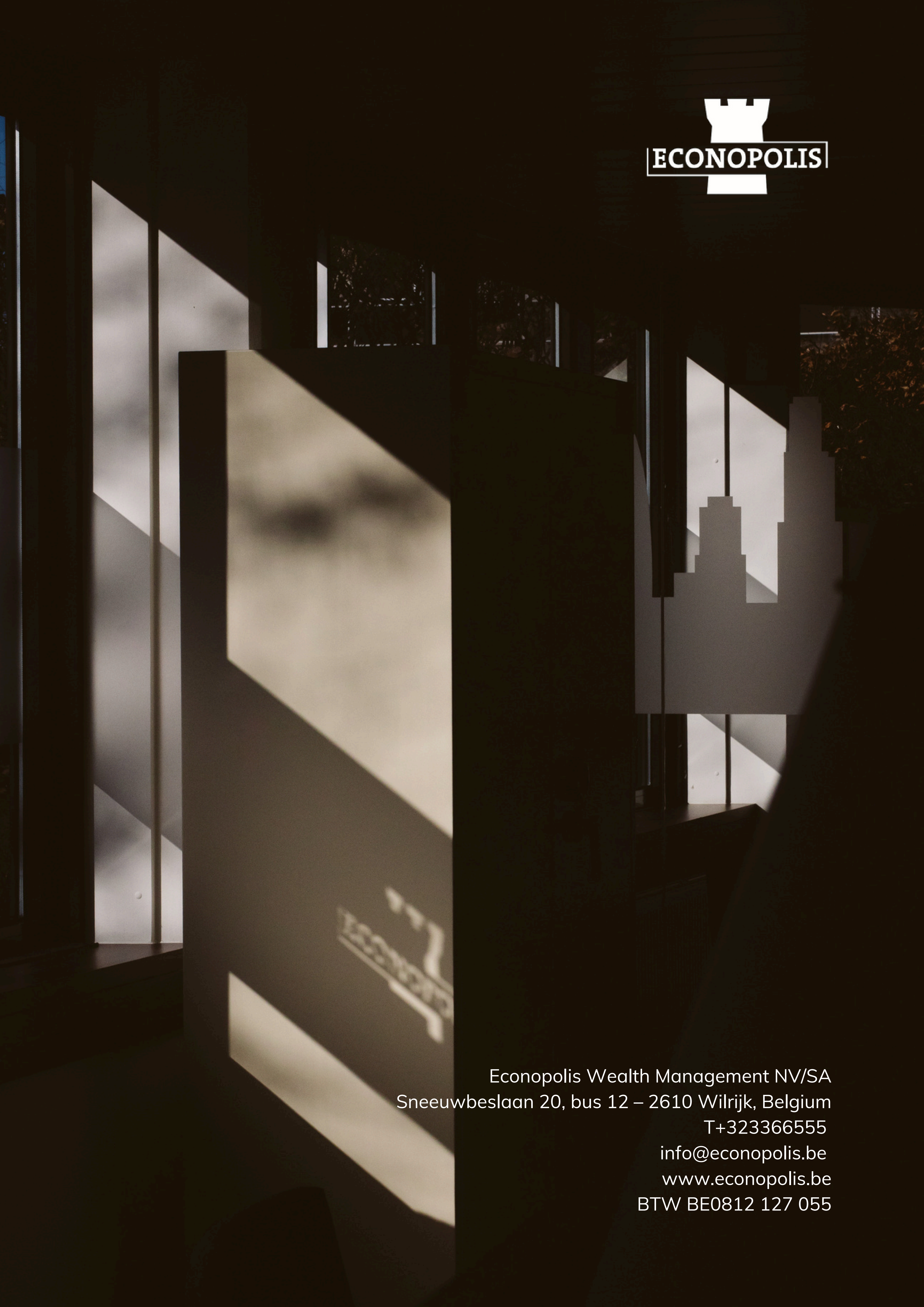
What standards does Econopolis apply in its management and advice?

Econopolis takes the following internationally accepted standards into account in its portfolio management and investment advice:

- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact (UN Global Compact)
- United Nations Sustainable Development Goals (UN Sustainable Development Goals)
- Core Conventions of the International Labour Organization (ILO Conventions)
- The Paris Agreement
- Exclusion list of the Norwegian Pension Fund
- International Finance Corporation Exclusion List
- Self-imposed standards as set out in the ESG policies

Questions?

For questions about the ESG policy, please contact info@econopolis.be or your account manager.



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