Principal Adverse Impact Statement 2024

Section I: Financial Market Participant

Section II: Financial Adviser

30 June 2025

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Section I - Statement on principal adverse impacts of investment decisions on sustainability factors as Financial Market Participant

1. Summary

Banque Degroof Petercam Luxembourg S.A. (hereinafter "BDPL"), LEI: NCKZJ8T1GQ25CDCFSD44, considers principal adverse impacts of its investment decisions on sustainability factors ("PAI"). This statement is the entity-level statement[1] on principal adverse impacts on sustainability factors of Banque Degroof Petercam Luxembourg according to article 4 of the Sustainable Finance Disclosure Regulation (here after "SFDR")[2] and the Delegated Regulation SFDR[3].

This report covers the reference period from 1 January 2024 to 31 December 2024 and incorporates the reporting of quantitative information for that reference period.

BDPL considers principal adverse impact on entity level as part of its global sustainable investment approach. This is done by measuring and -to the best extend possible- monitoring the aggregated negative impact on sustainability factors of our investment decisions regarding our discretionary portfolio management mandates to assess principal adverse impacts on entity level. This means concretely that BDPL considers the mandatory principal adverse impact indicators and two voluntary indicators, defined by SFDR but subject to data availability and quality.

Although we note an improvement in data quality and availability, this remained a particular point of attention for 2024 with regard to the calculation of certain PAI, and has led to difficulties in properly controlling PAI (as for example the data on investment funds is based on data of the investee companies, there is an inevitable gap in the data upstream even taking into account the different transparency measures taken by the EU and other legislators). In the light thereof, the data quality and coverage remains a key issues in the comparison between reporting years and we assume this will remain an attention point until data upstream (investee companies, investment funds,…) will become stable.

BDPL has established a framework for all PAIs; however, depending on data availability and quality, this framework may be limited and indirect for some PAIs, while more comprehensive for others. Since 2022, significant efforts have been made to integrate non-financial data into our core operational systems. In 2024, we implemented a solution to enhance ESG data flows, aiming to improve the management of non-financial information, including adverse impacts.

Moreover, with increasing transparency—particularly through the implementation of the CSRD directive—BDPL is now better positioned to manage and mitigate negative effects. The framework mentioned above includes a solid governance in which data quality & availability are thoroughly discussed on a regular basis.

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[1] This document only relates to the entity itself and is not on a consolidated basis nor regarding the other entities of the Group Degroof Petercam.
[2] Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector.
[3] Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports.

The policies and governance of BDPL mentioned in this report cover the reporting period 2024 and might be subject to further evolutions due to regulatory evolutions and Crédit Agricole Group insights.

Section I of the document contains the PAI statement of BDPL as Financial Market Participant (hereinafter "FMP"). It therefore applies consistently to all discretionary managed portfolios qualifying as financial products as per Regulation (EU) 2019/2088, for which BDPL acts as a portfolio manager. From an investment service perspective, it does apply only to discretionary portfolio management mandates.

The figures and tables mentioned in this document regarding Section I are thus only based on our discretionary portfolio management.

In this regard, BDPL wants to mention that for this section it does not consider adverse impacts of its investment decisions on sustainability factors for derivatives as no established accounting methodologies are available for these financial instruments.

This PAI report includes the figures relating to third-party funds used in our discretionary managed portfolios.

BDPL, as a Financial Adviser (hereinafter "FA"), also considers PAI into its investment advice services (as defined under regulation 2019/2088) and this is covered by a separate statement at the end of this document (**Section II**).

This statement provides details on the different principle adverse indicators and maps policies to identify and prioritize principal adverse impacts on sustainability factors both for its discretionary portfolio management which is governed by the same principles as described below. As it is SFDR product benefiting from the same internal sustainability framework within BDPL the following chapters and content are applicable and valid to our discretionary portfolio management.

BDPL's Global Sustainable Investment Policy (hereinafter "GSIP") which contain the Extra-Financial Investment Process and Controversial Activities Policy are used to identify and prioritize principle adverse impacts. BDPL focuses on active engagement, represented in its Funds Engagement Policy and by doing so aims to mitigate potential adverse impacts of its investments. The different policies and subsequent approaches of BDPL are rooted in International Standards.

2. Description of the principle adverse sustainability impacts

The various BDPL policies describe the extent to which Principle Adverse Sustainability Impacts (PAI) need to be taken into consideration in a structural manner for its discretionary portfolio management.

The main focus in this regard is done by the Global Sustainable Investment Policy (GSIP) which incorporates the Extra-Financial Investment Process of BDPL (“EFIP”). Various measures in other policies also aim to limit our negative impact on these indicators. These other policies are:

- the Controversial Activities Policy (CAP - exclusion policy);
- the Funds Engagement Policy (FEP).

The PAI that are considered and the way they are (or can be) considered depend on the type of financial product. The table below exhibits the mandatory PAI for both corporate issuers and national and supranational issuers (hereinafter “sovereigns”), as well as the additional PAI for environmental and social matters. The voluntary indicators were selected after a careful consideration of the major materiality risks across BDPL’s investments that were not yet covered by other indicators on principal adverse impacts on sustainability factors.

These tables include the different indicators, a short description of the metric, the impact of the reporting year, the impact of the previous reporting year and an explanation with also an overview of any consecutive steps taken or to be taken. For an overview of the policies in which these metrics are taken into consideration and their main data source, please check the tables at pages 6 to 15.

For the purposes of the calculation of the impact in table 1, 2, 3, 4 and 5, BDPL excluded, derivatives, and cash from the scope.

For the column of “actions taken, and actions planned, and targets set for the next reference period”, describes the current state of affairs and the actions that BDPL intends to conduct over the next 12 months to manage or even limit the PAI figures as mentioned below. The recurrent update and finetuning of our sustainability framework (policies, procedures, and engagement outcome) will also be a step in this regard.

BDPL performs in this regard a look-through analysis on funds that are part of the core offer and conviction list[4] in order to assess their exposure to Principal Adverse Indicators and whenever it is required to engage with the funds managers. The PAI calculation itself will be done based on the data derived from the EET files.

[4] List of the instruments that can be used in discretionary portfolio management and under pro-active investment advice

Table 1: Indicators applicable to investments in investee companies

Adverse sustainability indicator		Metric	Impact (2024)	Impact (2023)	Explanation	Action taken, and actions planned, and targets set for the next reference period
Greenhouse gas emissions (GHG)	1. GHG emissions	Scope 1 GHG emissions	32 003,99 tons	36 024 tons	Reducing GHG emissions is a relatively complicated process at the moment and depends on a multitude of factors (data coverage, energy mix of countries, conversion factors, etc.). Despite this fact, BDPL was able to reduce scope 1,2 and 3 of GHG emissions. The difference between 2024 and 2023 can be explained mainly as followed: • BDPL has switched to a new data provider with an increased expertise on GHG emissions and energy metrics. This new data inflow can partially explain the increase as more granular data became available • More Fund managers have disclosed European ESG template or 'EET' files and more accurate data metrics are now available (as funds themselves can more and more use direct ESG data provided by investee companies) in our opinion this can lead to significant differences between calculations performed the previous years and in this last report. The data inflow increase is an important factor in the comparison between the reporting years and will remain an element to consider for the nearby future. It should also be noted that a large proportion of scope 3 emissions come from modelled data, which is more subject to fluctuations. BDPL is therefore unable to comment properly on this figure and the evolution this year.	Through its CAP- Exclusion policy, BDPL excludes certain companies from investment. As part of the basic and extended normative screening, companies in breach with the Global Standards (UN Global Compact) are omitted from investments. These Standards include -but are not limited to- supporting a precautionary approach to environmental challenges and encouraging the development and diffusion of environmentally friendly technologies. As part of its basic negative screening, BDPL excludes companies that derive a certain portion[5] of revenue from thermal coal extraction. This screening also excludes companies that derive a certain portion of coal- based power generation[6], or unconventional oil & gas production[7]. As part of its extensive negative screening (activities), BDPL also has set exclusions regarding the most "sustainable strategies" for conventional oil & gas exploration, extraction, refining and transport. It also excludes the generation of power from non-renewable energy sources or providing dedicated equipment or services. The exclusion thresholds of the thermal coal extraction, and unconventional oil & gas production are more stringent than with the basic negative screening. All thresholds for exclusion are depicted in the Exclusion policy. Next to the focus on activities, the extensive negative screening (behaviour) excludes companies with the most severe controversial behaviour. This covers a company's operational aspects such as emissions, as well as the environmental impact of its products and services. Moreover, the TCFD framework which BDPL follows up on, will foster further transition plans and mitigating actions. As BDPL recognizes the limits of these historical data, BDPL decided to include in its data framework as well forward-looking analysis using the SBTi alignment of companies. Through its Fund engagement policy, BDPL will challenge third-party funds regarding positions they hold that are not aligned with the principles mentioned above.
		Scope 2 GHG emissions	9 624,29 tons	11 864 tons		
		Scope 3 GHG emissions[8]	291 770,57 tons	309 631 tons		
		Total GHG emissions	334 029,77 tons	488 000 tons		

5 Exclusion threshold for all portfolios on revenue exposure for 2024 was at 10%, above the threshold is excluded. Stricter rules apply for portfolios with strong sustainable preferences.
6 Exclusion threshold for all portfolios on revenue exposure for 2024 was at 30%, above the threshold is excluded. Stricter rules apply for portfolios with strong sustainable preferences.
7 Exclusion threshold for all portfolios on revenue exposure for 2024 was at 20%, above the threshold is excluded. Stricter rules apply for portfolios with strong sustainable preferences.
8 These emissions do not include the downstream scope 3 emissions yet, which will be remedied during the next iteration of this report.

	2. Carbon footprint	Carbon footprint	115,01 tons per million of AUM	378,59 tons per million of AUM	Reducing the carbon footprint is a relatively complicated process at the moment and depends on a multitude of factors (data coverage, country energy mixes, conversion factors, etc.). While GHF emissions (PAI 1) are increasing, Carbon footprint is decreasing due to different metrics *("Unit of comparison integrating Ton per unit of revenues")* and thus its link to our assets under management. The difference between 2024 and 2023 can be explained mainly as followed: • BDPL has switched to a new data provider with an increased expertise on GHG emissions and energy metrics. This new data inflow can partially explain the increase as more granular data became available • More Fund managers have disclosed European ESG template or EET files and more accurate data metrics are now available (as funds themselves can more and more use direct ESG data provided by investee companies) in our opinion this can lead to significant differences between calculations performed the previous years and in this last report. The data inflow increase is an important factor in the comparison between the reporting years and will remain an element to consider for the nearby future. It should also be noted that a large proportion of scope 3 emissions come from modelled data, which is more subject to fluctuations. It should also be noted that a large proportion of scope 3 emissions come from modelled data, which is more subject to fluctuations. BDPL is therefore unable to comment properly on this figure and the evolution this year.	

	3.	GHG intensity of investee companies	GHG intensity of investee companies	806,44 tons per million in revenues (from underlying companies)	933,05 tons per million in revenues (from underlying companies)	The 2024 figures have decrease compared to the 2023 figures but also here we believe this is mainly based on the data provider change and the increased data quality (see points above). While GHF emissions (PAI 1) are increasing, GHG intensity is decreasing due to different metrics ("Unit of comparison integrating Ton per unit of revenues") and thus its link to our assets under management. It should also be noted that a large proportion of scope 3 emissions come from modelled data, which is more subject to fluctuations. BDPL is therefore unable to comment properly on this figure and the evolution this year.	
	4.	Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	10,82%	4%	We can as a first conclusion observe some companies having a larger than expected indirect exposure on energy like companies' part of the Utilities sector. As we apply our exclusion policy with issuer-based thresholds, we believe the increase is more global on the full investment universe and therefore we esteem it can be explained by the data provider change and the increased data quality (see points above).	
	5.	Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	Consumption: 58,9% Production: 6,62%	Consumption: 66% Production: 13%	As we apply our exclusion policy with issuer-based thresholds, we believe the decrease is more global on the full investment universe and therefore we esteem it can be explained by the data provider change and the increased data quality (see points above).	

	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector[9]	Agriculture, forestry and fishing: 0,41 Construction: 1,44 Electricity, gas steam and air conditioning supply: 1,07 Manufacturing: 0,44 Mining and quarrying: 0,88 Real estate activities: 0,25 Transportation and storage: 0,32 Water supply: sewerage, waste management and remediation activities: 1,56 Wholesale and retail trade; repair of motor vehicles and motorcycles: 0,31	Agriculture, forestry and fishing: No data Construction: 0,15 Electricity, gas steam and air conditioning supply: 3,46 Manufacturing: 0,44 Mining and quarrying: 0,67 Real estate activities: 0,56 Transportation and storage: 11,22 Water supply: sewerage, waste management and remediation activities: No data Wholesale and retail trade; repair of motor vehicles and motorcycles: 0,1	With regard to the sixth indicator, it is important to underline that there is currently very limited data available from the companies in which we invest, and changes in data input can have an important impact on the reported information (both in positive or negative sense). In addition, this PAI requires the use of an income denominator that is influenced by market movements over the course of 2024. Moreover, as we received more granular data regarding investment funds and therefore this increased coverage itself can also explain the observed impact and increase. It is therefore too early to talk about real management of this indicator, where actions are traced and impacts can be interpreted without ambiguity. On the basis of greater transparency on the part of companies (including through the CSRD), we will be able to take more targeted initiatives in this area in the near future, if necessary.	Through its Fund engagement policy, BDPL will challenge third-party funds regarding positions they hold that are not aligned with the principles mentioned above. Moreover, through the funds managed by DPAM, a signatory of the Net Zero Asset Management (NZAM) initiative, combined with SBTi targets, BDPL will benefit indirectly from this element to manage negative impacts. In its GSIP, BDPL emphasis how environmental matters including GHG emissions, carbon footprint and energy consumption are an important part of its ESG integration due diligence. It includes material figures around GHG emissions, tons of Co2 and energy consumption as part of its positive screening, ultimately favouring the best performers. The PAI 1. GHG emissions and PAI 2. Carbon Footprint are part of our prioritized PAI. Therefore, BDPL will closely monitor the evolution of these PAI in order to reduce the negative impact consequently.

[9] The mentioned figure -for now- does not incorporate calculations with regards to underlying funds (both DP Group Funds as third-party funds)

Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity- sensitive areas where activities of those investee companies negatively affect those areas	7,26%	6,72%	About this PAI, it is important to underline that there is currently very limited data available from the companies in which we invest and changes in data input can have an important impact on the reported information (both in positive or negative sense). It is therefore too early to talk about real management of this indicator, where actions are traced, and impacts can be interpreted without ambiguity. On the basis of greater transparency on the part of companies (including through the CSRD), we will be able to take more targeted initiatives in this area in the near future, if necessary.	For biodiversity, companies that violate global standards are excluded from investment as part of the normative screening process. These standards include, but are not limited to, supporting a precautionary approach to environmental challenges and encouraging the development and diffusion of environmentally friendly technologies. In addition to focusing on activities, extended negative screening (behavior) excludes companies displaying the most serious controversial behavior. This covers a company's operational aspects, such as the fact that it causes significant biodiversity loss, as well as the environmental impact of its products and services. Indirectly via investments in DPAM's in-house funds, a series of additional measures are taken. For example, DPAM uses a biodiversity footprint tool to assess impacts and dependencies, integrates biodiversity-related risks into its ESG research and is an early adopter of the TNFD (Taskforce on Nature-related Financial Disclosures) framework. DPAM is committed to Finance for Biodiversity.
Water	8. Emissions to water	Tones of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0,15 tons per million AUM	0,12 tons per million AUM	No significant change. The development of this PAI is assumed to be influenced by the use of an income denominator that is impacted by market movements during 2024. Moreover, regarding the DPAM funds used on our management, the largest contributor to this PAI in 2023 has been exited in 2024 which had an indirect positive effect on the BDPL figures. Given all the information gathered and the extent of data coverage (less than 12%), it is not possible to comment on the figures at this stage.	The actions taken in this regard for 2024 were done on an indirect approach. Through its CAP-Exclusion policy, BDPL excludes certain companies from investment. As part of the normative screening, companies in breach with the Global Standards are omitted from investments. These Standards include -but are not limited to- supporting a precautionary approach to environmental challenges and encouraging the development and diffusion of environmentally friendly technologies. Additionally, BDPL uses as a starting point to monitor this PAI for 2024 already some exclusions based on connected activities with an indirect consequence on this PAI: • As part of its basic negative screening, it excludes companies with certain revenues. derived from unconventional oil & gas production as they might have a negative impact on water contamination. • As part of its extensive negative screening (activities), BDPL has set more stringent exclusion thresholds for unconventional oil & gas production. All thresholds for exclusion are depicted in the Exclusion policy. Next to the focus on activities, the extensive negative screening (behaviour) excludes companies with the most severe controversial behaviour. This covers a company's operational aspects such as

						causing severe water pollution loss, as well as the environmental impact of its products and services. As part of its journey, BDPL will set further concrete steps ahead in the coming years in line with international insights that continue to develop in full force. As the challenges around water and biodiversity are closely linked, it is clear that here too, DPAM's above-mentioned TNFD commitment will support BDPL to realise its ambitions.
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	5,11 ton per million AUM	4,85 ton per million AUM	Changes in assets under management play an important role, making comparisons even more difficult. The development of this PAI is assumed to be influenced by the use of an investment denominator that is positively impacted by market movements during 2024. Additionally, changes in assets under management played an important role, making comparisons difficult. BDPL is therefore currently unable to comment properly on these figures and on this year's performance.	The actions taken in this regard for 2024 were done on an indirect approach. Through its CAP-Exclusion policy, BDPL excludes certain companies from investment. As part of the normative screening, companies in breach with the Global Standards are omitted from investments. These Standards include -but are not limited to- supporting a precautionary approach to environmental challenges and encouraging the development and diffusion of environmentally friendly technologies. Additionally, BDPL uses as a starting point to monitor this PAI for 2024 already some exclusions based on connected activities with an indirect consequence on this PAI: • As part of its basic negative screening, it excludes companies with revenues derived from thermal coal extraction as this activity might create hazardous waste. The exclusion thresholds of the thermal coal extraction are more stringent than with the basic negative screening. All thresholds for exclusion are depicted in the CAP-Exclusion policy. For 2024, BDPL did not exclude nuclear energy activities but will follow up on this topic.
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	3%	0,2%	The change is foremost due to data coverage fluctuations, especially based on the increased coverage regarding third-party funds. More third-party funds were part of the scope in 2024 and thus we observed a strong increase in reported data (more funds provided detailed data through the European ESG Template "EET") We believe this explain for a large part the difference between 2024 and 2023.	Through its CAP- Exclusion policy, BDPL excludes certain companies from investment. As part of the normative screening, companies in breach with the Global Standards are omitted from investments. Not complying with these Standards equates to violating UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises. As one of our priorities PAI for 2025, BDPL will closely monitor the evolution of this PAI in order to reduce the negative impact consequently.

	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	42,16%	21,35%	The change is foremost due to data coverage fluctuations, especially based on the increased coverage regarding third-party funds. More third-party funds were part of the scope in 2024 and thus we observed a strong increase in reported data (more funds provided detailed data through the European ESG Template "EET". We believe this explain for a large part the difference between 2024 and 2023.	Through its CAP-Exclusion policy, BDPL excludes certain companies from investment. As part of the normative screening, companies in breach with the Global Standards are omitted from investments. These Standards focus on -but are not limited to- labour rights and human rights. The extensive negative screening (behaviour) excludes companies with the most severe controversial behaviour. This covers a company's operational aspects such as causing severe human rights or labour infringements, as well as the social and societal impact of its products and services. Through its Fund engagement policy, BDPL will challenge third-party funds regarding position they held that are not aligned with the principles mentioned above.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	21,19%	3,96%	The change is foremost due to data coverage fluctuations, especially based on the increased coverage regarding third-party funds. More third-party funds were part of the scope in 2024 and thus we observed a strong increase in reported data (more funds provided detailed data through the European ESG Template "EET"). We believe this explains for a large part the difference between 2024 and 2023.	Through its CAP-Exclusion policy, BDPL excludes certain companies from investment. As part of the normative screening, companies in breach with the Global Standards are omitted from investments. These Standards include -but are not limited to- upholding the elimination of discrimination in respect of employment and occupation. Through its Fund engagement policy, BDPL will challenge third-party funds regarding position they held that are not aligned with the principles mentioned above.
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	36,16%	20,37%	The change is foremost due to data coverage fluctuations, especially based on the increased coverage regarding third-party funds. More third-party funds were part of the scope in 2024 and thus we observed a strong increase in reported data (more funds provided detailed data through the European ESG Template "EET"). We believe this explains for a large part the difference between 2024 and 2023.	Through the EFIP, part of the GSIP, this element is used within the broader "governance" assessment whereby worst performers are excluded from our universe or are score negatively on the ESG internal classification ("best-in-class"). Through its Fund engagement policy, BDPL might challenge third-party funds regarding position they held that are not aligned with the principles in this regard.

	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	1,2%	0%	This exposure is explained by the fact that some instruments were contributing negatively to this indicator. Since then (2025), they have been sold.	Through its CAP-Exclusion policy, BDPL excludes certain companies from investment. As part of its basic negative screening, it excludes companies with any direct revenue exposure to anti-personnel landmines, cluster munitions and armours. As one of our priorities PAI for 2023, BDPL will closely monitor the evolution of this PAI in order to reduce the negative impact consequently.

Table 2: Indicators applicable to investments in in sovereigns and supranationals

Adverse sustainability indicator		Metric	Impact (2024)	Impact (2023)	Explanation	Action taken, and actions planned, and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	269,26 tons of CO_2 per million euros GDP[10]	193,32 tons of CO_2 per million euros GDP	The companies in which Degroof Petercam invests have disclosed more data than last year. This is why we are able to disclose a figure for 2024.	The actions taken in this regard for 2024 were done on an indirect approach. Through the EFIP, part of the GSIP, this element is used within the broader “governance” assessment whereby worst performers are excluded from our universe or are score negatively on the ESG internal classification (“best-in-class”).
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	0%	0%	No change. We believe this is based on our exclusion policy, through which we have been able to maintain zero exposure.	Through its CAP-Exclusion policy, BDPL excludes certain countries from investment. As part of its basic negative screening, it excludes investments in sovereign bond issuers that are considered non-free and authoritarian, unless their currency is a reserve currency for moderate profiles.

[10] GDP : Gross domestic product.

Table 3: Indicators applicable to investments in real estate assets[11]

Adverse sustainability indicator		Metric	Impact (2024)	Impact (2023)	Explanation	Actions taken, and actions planned, and targets set for the next reference period
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	NA	NA	NA	NA
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	NA	NA	NA	NA

Table 4: Additional climate and other environment-related indicators

Adverse impact on sustainability factors (qualitative or quantitative)		Metric	Impact (2024)	Impact (2023)	Explanation	Action taken, and actions planned and targets set for the next reference period
Indicators applicable to investments in investee companies CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Water, waste and material emissions	6. Water usage and recycling	1. Average amount of water consumed by the investee companies (in cubic meters) per million EUR of revenue of investee companies	161 607,74 cubic metres per million AUM	2 742,06 cubic metres per million AUM	The difference in figures between 2023 and 2024 for this PAI can potentially be explained by a change in data coverage and by the revenue denominator which was impacted by the market movements during the course of 2024.	Through its CAP-Exclusion policy, BDPL excludes certain companies from investment. As part of the normative screening, companies in breach with the Global Standards are omitted from investments. These Standards include -but are not limited to- undertaking initiatives to promote greater environmental responsibility.
		2. Weighted average percentage of water recycled and reused by investee companies	829,45%	No data available	For this PAI indicator, 2024 is the first year for which it was possible to be reported.	Additionally, BDPL uses as a starting point to monitor this PAI for 2024 already some exclusions based on connected activities with an indirect consequence on this PAI: • As part of its basic negative screening, it excludes companies with certain revenues derived from unconventional oil & gas production as this might generate an important water consumption. As one of our voluntary PAI for 2025, BDPL will closely monitor the evolution of this PAI in order to reduce the negative impact consequently.

[11] As BDPL does not do direct investments into real estate assets for its clients under discretionary portfolio management nor in the managed sub-funds, the table has been withheld in the report but for transparency reasons, "NA" has been mentioned.

Table 5: Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

Adverse impact on sustainability factors (qualitative or quantitative)		Metric	Impact (2024)	Impact (2023)	Explanation	Action taken, and actions planned and targets set for the next reference period
Indicators applicable to investments in investee companies						
Social and employee matters	3. Number of days lost to injuries, accidents, fatalities, or illness	Number of workdays[12] lost to injuries, accidents, fatalities, or illness of investee companies expressed as a weighted average	4,39 days on average per employee and per company	2,32 days on average per employee and per company	This figure can be explained by the fact that until recently companies did not publish this data. Data coverage for this PAI remains relatively poor in 2024, and thus, small changes in data have a larger impact on the reported data (both in positive or negative sense).	In its GSIP, BDPL emphasis how social matters including working conditions like injuries, accidents, fatalities or illness of employees are an important part of its ESG integration due diligence. It includes material figures around number of days lost of injuries as part of its positive screening, ultimately favouring the best performers. Within the analysis ESG risks" and the approach "best in class" within peers, this element is taken into account as one of the social parameters. As one of our voluntary PAI for 2025, BDPL will closely monitor the evolution of this PAI in order to reduce the negative impact consequently.

BDPL performs in this regard a look-through analysis on funds that are part of the core offer and conviction list[13] in order to assess their exposure to Principal Adverse Indicators and whenever it is required to engage with the funds managers. The PAI calculation itself will be done based on the data derived from the EET files.

[12] Working days are calculated on the basis of data from employees and external staff of the beneficiary companies.
[13] List of the instruments that can be used in discretionary portfolio management and under pro-active investment advice.

3. Description of policies to identify and prioritize principal adverse impacts on sustainable factors

With the urgency of having concerted efforts on the energy transition and of facing the many environmental and social challenges we want to play an active role.

BDPL's Global Sustainable Investment Policy (GSIP) is designed to identify and manage accordingly sustainability risks, assess, and manage key adverse impacts on sustainability factors in relation to its investment decisions in the context of discretionary management, investment advisory services. This policy was adopted in March 2021 and has been updated in January 2023.

BDPL also has other policies that consider some of the principal adverse impacts, as depicted in Tables 1, 2, 3, 4 and 5 above.

- Controversial Activities policy (Group version adopted in 2023): This Group policy describes BDPL standpoint on business activities that stimulate debate among various parties and tend to be controversial. This policy identifies the activities excluded from BDPL's investment universe and criteria activities should meet in order to be included.
- Fund Engagement Policy (initially adapted in 2023): This policy aims to define a framework and measures to be applied when BDPL engages with fund managers in the context of the bank's commitment to Europe's Sustainable Finance Agenda. As developed in the "engagement policies" chapter, BDPL is mainly active on engaging with external and internal fund managers although some engagement with Corporate issuers is also realized through Degroof Petercam Asset Management.

Besides the mentioned policies, BDPL benefits for the intra-Group's expertise and Sustainability Steering Groups that all report to the Non-Financial Risk Committee (NFRC).

The RISG meets every month and is chaired by the CEO of Degroof Petercam Asset Management (DPAM). Non-DPAM staff members are invited to join the RISG to extend its scope to all the group's Responsible Investment aspects. Besides, the group Degroof Petercam has setup a Responsible Banking Steering Group (RBSG) in March 2022, to oversee the sustainability of the banking activities. This includes especially the steering of the Private Banking value proposition and service offering including reflection regarding exclusions and PAI. This steering group convenes on a monthly basis and is chaired by the BDPB's head of non-financial risk management. Finally, there is also an ESG Strategy committee that considers the group's strategy. This committee is led by the Group Sustainability Manager.

1. Identifying and prioritizing environmental principle adverse indicators for corporates

By the Extra-Financial Investment Process (EFIP), part of the GSIP, our investments teams and the portfolio and fund managers are provided with an extra-financial classification methodology enabling them to identify companies' exposure to key sustainability issues and to monitor how these companies deal with these issues.

Under EFIP, issuers (companies) are analysed from different angles.

The first angle is their eligibility. In practice, we exclude certain issuers based on an analysis of controversial activities and/or behavior.

Therefore, we perform a normative screening (compliance with relevant international rules, standards and protocols) based on environmental, social and governance criteria. The result of the screening leads to the exclusion of (or engagement in case the issuer is held through a fund we invest in) :

- Issuers involved in controversial activities or sectors;
- Issuers that do not respect the principles of the United Nations Global Compact;
- Issuers exposed to severe environmental, social or governance controversies;
- Issuers with unsatisfactory corporate governance scores (see below).

This analysis pillar therefore allows us to assess the degree of eligibility of a financial instrument (for which types of mandates and for which sustainability profiles is the instrument eligible or not). In the case of funds, this pillar allows us to identify the managers with whom we will enter into discussion concerning the underlying positions that we consider problematic (what we also call Fund Engagement Policy[14]).

The second angle is the extent to which they integrate and manage environmental, social or governance (ESG) risks. We analyse both their exposure to these risks and how they manage them. In order to assess this ESG risk integration we rely on a peer-analysis realized by sector on both environmental and social factors. Within each sector, companies are ranked, and we flag the best-in-class[15] ones as “ESG”. At contrary companies that are the worst within their peer’s group will be flagged as “non-ESG” [16]. Others are categorized as “neutral”. These rankings are used to respect predefined thresholds within the portfolios.

The third and last angle is their sustainability-impact. We measure how the products and services provided by the issuer contribute to specific environmental and social objectives.

The selection of instrument into our eligible investment universe for discretionary portfolio management (including the fund selection) and the portfolio construction process both take into account these three angles. These ESG aspects indirectly helps us to limit our negative impact on Principal Adverse Indicators by excluding problematic sectors or activities and favorizing into the investment process the best-in class players in their sector or the issuers with a good sustainable score.

To further strengthen sustainability strategy, BDPL has defined a global approach on its management of negative impacts by applying in its overall due diligence process a more active screening on a list of material pre-selected PAI indicators that will have an influence on its investment decisions and advisory setup:

- 1. Green House Gas emissions
- 2. Carbon footprint
- 10. Violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- 14.Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, and biological weapons).

It’s worth noting that BDPL is subject to the Luxembourg law of 4 June 2009 implementing the Convention on Cluster Munitions, which includes a prohibition for all persons or businesses from knowingly financing cluster munitions or explosive submunitions[17]. As a Responsible Bank, BDPL does not finance this type of weaponry.

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[14] FundEngagementPolicy_ENG_v1.0_2022.pdf (ctfassets.net).
15 The concept of Best-In-Class is used to identify companies with superior ESG characteristics. Selection is always based on a comparison with peers. Following the "best-in-class" principle does not necessarily mean excluding the most controversial sectors or industries, but the aim is to invest as a priority in companies that make the greatest effort to respect ESG criteria in their respective sectors.
16 Instruments that are not the best in their sector in terms of ESG.
[17] Act of 4 June 2009 approving the Convention on Cluster Munitions, opened for signature in Oslo, 3 December 2008.

The PAI filters all BDPL eligible instruments at the start of the process to avoid exposure to controversial weapons.

Finally, it is BDPL's intention to closely monitor its potential impact on the other indicators and to make corrections where and when necessary.

2. Identifying and prioritizing principle adverse indicators for sovereigns

The identification and prioritization of the principle adverse social indicator for sovereigns is also part of BDPL's evaluation and screening process. In this screening process different risk ratings regarding the environmental and the social aspect, such as respect for civil liberties and political rights, respect for human rights and the level of violence in the country, commitment to major labour law conventions, the issue of equal opportunities and distribution of wealth, etc. are used to screen and label the different countries.

Moreover, the two PAI applicable to sovereign and supranational issuers ("Greenhouse Gas intensity" and "investee countries subject to social violations") are part of the BDPL priority list.

3. Identifying and prioritizing adverse indicators for third party funds

All our discretionary managed portfolios can invest in funds that are products under Regulation (EU) 2019/2088. The funds used within our discretionary portfolio management need to respect the criteria as defined under point 1. Therefore, we perform on the third-party funds part of our Conviction List look-through analysis of the composition in order to manage potential PAI issues.

Therefore, the companies in which investments are made by these third-party funds must apply good governance practices, and sustainable investments made by the funds may not cause significant harm to any environmental or social sustainable investment objective (i.e. by taking into account indicators for adverse impacts on sustainability factors), in accordance with Regulation 2019/2088 and they need to respect the EFIP of BDPL.

BDPL engages thus with the third-party fund manager regarding the respect of the EFIP criteria defined by BDPL and in this regard a marginal due diligence regarding principal adverse impacts can be done.

4. Data sources used

Table 1: Indicators applicable to investments in investee companies

	Adverse sustainability indicator	Document describing the manner of PAI consideration	Coverage[18]	Main data source
Greenhouse gas emissions	1. GHG emissions	GISP, exclusion policy GISP, exclusion policy GISP, exclusion policy GISP, exclusion policy	50,65% coverage	Trucost & Cleversoft[19]
	2. Carbon footprint	GISP, exclusion policy	50,65% coverage	
	3. GHG intensity of investee companies	GISP, exclusion policy	44,29% coverage	
	4. Exposure to companies active in the fossil fuel sector	GISP, exclusion policy	53,64% coverage	
	5. Share of non-renewable energy consumption and production	GISP, exclusion policy	51,60% coverage	
	6. Energy consumption intensity per high impact climate sector	GISP, exclusion policy	In general, less than 10% coverage	
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	exclusion policy	53,49% coverage	Sustainalytics & Cleversoft
Water	8. Emissions to water	exclusion policy	10,46% coverage	Sustainalytics & Cleversoft
Waste	9. Hazardous waste and radioactive waste ratio	exclusion policy	47,06% coverage	Sustainalytics & Cleversoft
Social and employee matters	10. Violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	GISP, exclusion policy	53,58% coverage	Sustainalytics & Cleversoft & MSCI
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	GISP, exclusion policy	53,79% coverage	
	12. Unadjusted gender pay gap	GISP, exclusion policy	4,42% coverage	
	13. Board gender diversity	GISP, exclusion policy	52,78% coverage	
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	GISP, exclusion policy	53,73% coverage	ISS-Ethics

[18] By "direct line coverage", we wish to highlight the fact that we do not currently have 100% PAI data for direct line investments (equities and bonds) within the discretionary management service. We give an indicative percentage range here. PAI data coverage will increase significantly over the next few years.

[19] Data used for the PAI report in case of funds will be derived from EET files collected through Cleversoft.

Table 2: Indicators applicable to investments in in sovereigns and supranationals

	Adverse sustainability indicator	Document describing the manner of PAI consideration	Coverage	Main data source
Environmental	15. GHG intensity	GISP, exclusion policy	10,69%	Sustainalytics & Cleversoft
Social	16. Investee countries subject to social violations	GISP, exclusion policy	100% coverage	Sustainalytics & Cleversoft

Table 3: Indicators applicable to investments in real estate assets

	Adverse sustainability indicator	Document describing the manner of PAI consideration	Coverage	Main data source
Fossil fuels	17. Exposure to fossil fuels through real estate assets	NA	NA	NA
Energy efficiency	18. Exposure to energy-inefficient real estate assets	NA	NA	NA

Table 4: Additional climate and other environment-related indicator

Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Document describing the manner of PAI consideration	Coverage	Main data source
Indicators applicable to investments in investee companies CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS				
Water, waste, and material emissions	6.1. Average amount of water consumed by the investee companies (in cubic meters) per million EUR of revenue of investee companies)	GISP, exclusion policy	62,62% coverage	Cleversoft & Trucost
	6.2. Weighted average percentage of water recycled and reused by investee companies		44,46% coverage	

Table 5: Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Document describing the manner of PAI consideration	Coverage of direct lines (equities and bonds)	Main data source
Indicators applicable to investments in investee companies				
Social and employee matters	3. Number of days lost to injuries, accidents, fatalities or illness	GISP, exclusion policy	8,9% coverage	Sustainalytics & Cleversoft

4. Managing the margin of error

There is a broadly supported sector-view that the main limitations regarding sustainable finance including PAI management are data availability and data quality. At BDPL, we are aware of these limitations that affect our methodology and the way we use to manage our impact on Principal Adverse Indicators ("PAI"). Consequently, we have put into place, to the best extend possible, elements to mitigate these elements.

Our analyses are principally based on data provided by external data providers that are collecting ESG data at underlying companies and therefore depend on the quality of this information and the potential difference in methodology between the different data source and as consequence a difference in PAI score might appear. ESG reporting by companies and other issuers is still limited. With the new Corporate Sustainability Reporting Directive ("CSRD")[20] that will force companies to disclose on ESG data the situation will definitely improve in the coming years. Furthermore, it remains difficult to anticipate the emergence of ESG controversies that could lead to an alteration in the quality of the reported ESG data of the issuer being held in the portfolio.

In order to overcome the data availability and quality attention point at investee company-level, we use estimates and scorings made by data providers to complete the reported data. Although the use of these data is really critical to get a comprehensive insight of the way the company deals with ESG challenges, we also face here several general market-related limitations:

- The coverage rate of companies and instruments is increasing –we observed a strong increase on investment funds data by the provision of more EET with more granular data– but remains incomplete compared to our Investment Universe. This means that for the different PAI we don't obtain the relevant data on all instrument in scope of this reporting. However, BDPL has added a coverage score to the PAI data from this year to improve transparency on the relevance of the reported figures (coverage score for direct lines and funds);
- The bias in favor of large market capitalizations publishing quantity of information and sustainability reports, as opposed to smaller market capitalizations with fewer marketing and reporting resources. That may lead smaller companies to have no ESG data available on the market or to have less attractive scorings,

[20] Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting.

the correlation between a company's extra-financial rating and its publication rate remains relatively high;

- The bias towards good ESG practices based on a western benchmark, as extra-financial rating agencies remain conditioned by a western view of environmental, social and good governance issues, to the detriment of companies from emerging economies, particularly Asian ones;
- The relevance of the criteria used for the evaluation: the use of relatively global standards does not always make it possible to capture the particularities and truly material issues of certain specific economic activities, to the disadvantage of companies that are highly specialized in one sector of activity.

In order to manage these limitations BDPL is taking a number of measures:

- We first participate to the Responsible Investment Steering Group ("RISG") of Degroof Petercam. In the RISG, particular cases and relevant bias are analyzed in order to make the required adjustments (downgrading or upgrading);
- The second way to manage these limitations is to initiate a dialogue with the fund managers. This dialogue is important to exchange on divergences with them, improve the quality of our data or draw their attention on negative impact of companies they invest in.

Managing the margin of error for our investments

Despite these efforts, there is still a margin of error that for now remains on data quality and availability regarding our in-house methodology on the principal adverse impacts. Working with data providers may always lead to inaccuracies, which BDPL tries to remedy through different means. These remediation steps are applicable for both investments in corporate issuers, sovereigns and regarding third-party funds. They include, but are not limited to:

- One key adverse impact is the exposure to companies facing violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, which aim to uphold four fundamental principles: defend human rights, defend labor rights, prevent corruption and protect the environment. ESG rating agencies assess companies' compliance with these principles based on specific criteria derived from the 10 principles of the UN Global Compact[21]. The analysis identifies companies that have faced incidents and severe controversies resulting in violations of these fundamental rights principles. The severity of the controversies and incidents is evaluated based on national and international legislation, but also considers international ESG standards, such as the recommendations of the OECD for multinational companies, the conventions of the International Labor organization, the Universal Declaration of Human Rights, and others. BDPL uses two data providers to assess a company's compliance with these global standards, and if one or both providers flag a company as non-compliant, the company is excluded.
- In our private banking practice, we recognize the importance of offering a diverse range of investment opportunities to our clients, which includes investing in various funds. However, we acknowledge that these funds may have different underlying values and environmental, social, and governance (ESG) views, potentially resulting in investments in companies that do not align with our established standards. To address this potential discrepancy, we have developed a comprehensive methodology outlined in our "Fund Engagement Policy" document (please refer to this document for further details).
- As data is lacking on quite some issuers, BDPL also uses partially modelled data, for example on GHG which is provided through data providers such as S&P Global, Trucost, CDP and Morningstar Sustainalytics.

[21] The Ten Principles | UN Global Compact

5. Engagement policies

BDPL invests directly or indirectly (i.e. through patrimonial funds) a proportion of its AuM in funds that are managed by DPAM, the asset management company in the Group. For that part of its portfolios, it relies on the engagements done by DPAM. For a complete overview of DPAM's policies, please check the dedicated webpage.

For the proportion of its AuM that it invests directly or indirectly (i.e.through patrimonial funds) in funds that are managed by third-party asset managers than DPAM, BDPL has developed a Fund Engagement Policy ("FEP"). In this policy, BDPL affirms that it considers it has a responsibility to express its opinion on the management of the third-party funds in which it invests and make its voice heard. BDPL will, therefore, not hesitate to speak up to urge fund managers in which it invests to be managed according to best practices. Engaging with fund managers through direct dialogue during meetings with their representative, or more formally, as described in the engagement policy, is a means to ensure that these best practices are respected. The process explained in the FEP pays particular attention to investments that are made by external managers in companies that BDPL would otherwise exclude as part of the group's Controversial Activities Policy (CAP-Exclusion Policy). The CAP affirms the group's standpoint regarding (1) business activities that are deemed controversial and (2) behaviors in which we refuse to get involved in as a firm.

For instance, BDPL, has committed not to finance controversial activities such as tobacco, thermal coal, or nuclear weapons. Next to these exclusions, the CAP also discusses BDPL's stance on other activities, such as unconventional and conventional oil and gas, palm oil, democratic requirements, etc. Our commitment to aligning investments with our clients' values and maintaining a high standard of ESG criteria remains paramount throughout this process.

The outcome of the fund engagement activity of BDPL are regularly and at least once a year reported to the RBSG.

6. Reference to international standards

The mandates that are products promoting ESG characteristics (article 8 SFDR) or products promoting ESG characteristics and making sustainable investments (article 8 SFDR) follow the BDPL approach and apply an investment restriction based on the non-compliance to the global standards.

These mandates avoid investing in companies in breach with the 10 Global Compact principles of the UN Global Compact principles, ILO instruments[22], OECD Multinational Enterprises (MNE) Guidelines, UNGPs and Underlying Conventions and Treaties. BDPL decided to use a conservative approach to check the adherence of investee companies to these standards. In case a non-compliant status of a company is observed by either data providers Sustainalytics or MSCI ESG, the company is put on the blacklist.

Furthermore, DPAM is a signatory of the UN-supported Principles for Responsible Investment (“PRI”). The PRI is the world’s leading proponent of responsible investment. The PRI helps its international network of investor signatories to understand the investment implications of Environmental, Social and Governance (“ESG”) factors, and to integrate those factors into their decisions related to investment and active ownership.

As our portfolio management uses also DPAM funds within the portfolio construction, it is also important to mentioned that the asset management entity DPAM is a signatory of the Net Zero Asset Management (“NZAM”) initiative. In this context, the NZAM initiative strives to promote the objective of net zero greenhouse gas emissions by 2050 or at the earliest, in line with the Paris Agreement. This initiative also supports investments aligned with the net zero emissions objective. With regards to DPAM active funds, in any compartments Article 8 and 9 SFDR, 75% of the portfolio constituents of carbon intensive sectors need to have Science Bade Targets or emissions aligned with a 1.5°C scenario by 2030. Moreover, any active compartments Article 8, 9 SFDR, 50% of the portfolio constituents of non-carbon intensive sectors need to have Science Bade Targets or emissions aligned with a 1.5°C scenario by 2030. The data to assess this is directly derived from the Science Based Target initiative (“SBTi”) website.

7. Historical comparison

BDPL has described the negative impacts on sustainability factors relating to the previous period.

In the section 2, “description of the main negative impacts on sustainability factors” in table 1, 2, 3, 4 and 5, BDPL provides a historical comparison between 2023 and 2024.

[22] ILO: International Labour Organization.

Section II - Statement on principal adverse impacts of investment advice on sustainability factors as financial adviser

As a Financial Adviser, the instruments that can be used for investment advice are part of the same Universe[23] as for Discretionary Management and thus will benefit from the same screening process and exclusion criteria whereby impacts are managed accordingly. Moreover, funds are benefiting from the same level of screening.

Additionally, even though Advisory portfolios are as such no SFDR products, the rules on the eligibility and proportion of an SFDR article 8 product are also used as benchmark for them as part of the internal Sustainable investment strategy as defined in the GSIP. These rules are applied by BDPL independently of the profile defined within the MIFID questionnaire “sustainability preferences” flow as it is the overarching strategy of BDPL to limit the negative impacts for all managed and advised portfolios. Therefore, these rules of the sustainable investment strategy of BDPL are applied to all “investment decisions and recommendations” taken by BDPL. By doing so, BDPL intends to limit the PAI of its investment decisions at entity level based on a global approach.

Regarding specific PAI as part of the sustainable preferences questionnaire within MiFID suitability, a client can as of August 2022 express for investment advisory services, as to whether and, if so, to what extent, the consideration of principal adverse impacts on sustainability factors shall be integrated into his, her, its investment. In this setup, BDPL does not consider any preferences on adverse impacts of investment decisions on sustainability factors in its investment advice on any other financial instruments than investment funds. This is because no established accounting methodologies are available for the other financial instruments.

Process used by BDPL to select the Instruments BDPL advise on

1. Use of information published by financial market participants pursuant to SFDR

For advisory mandates BDPL can state:

- As all instruments in scope for discretionary portfolio management are part of the same universe as the instruments used for our Advisory services, the latter benefits from the same approach, controls and monitoring as describe above.
- In the same philosophy as for Sustainability risks, BDPL believes that choosing issuers, companies with a lower ESG risk exposure and/or a better management of this exposure allows to lower the impact on the PAI. Furthermore, during our Due Diligence process BDPL gives priority to a large proportion of companies that outperform their peers (within an industry) on the Environmental and/or Social themes, defines minimum proportions of Sustainable investments (aligned with Taxonomy or with a global positive impact on UN SDG’s), applies exclusion policies and BDPL strongly limits the number of bad performers. By doing this we try to limit our impact on the PAI.
- As BDPL has no direct influence on the underlying investments made by the fund managers of the third-party funds it selects, some of the funds might invest in instruments that would be excluded were they done directly by BDPL as they are not compliant with our GSIP and consequently have a negative sustainability impact. In order to limit negative impact within third party Funds, BDPL works with an engagement policy towards these external fund managers to allow them

to change their setup or if they do not react accordingly to exclude these funds from our selection;

- Whenever a client expresses specific preferences regarding PAI, given limited availability of data in 2024 on this element, the difficulty to match funds with these preferences was a major burden. BDPL will do its best to take them into account in the investment process based on enhanced product data and internal guidelines.

2. Ranking and selection of instruments based on the indicators listed in Table 1 of Annex I Delegated Regulation SFDR and any additional indicators and, where applicable, a description of the ranking and selection methodology used

When advising on instruments and funds, BDPL selects them based on different financial and extra-financial criteria whereby by exclusions and “best-in-class” approaches are directly linked to PAI elements.

For 2024 BDPL has not set any ranking methodology.

3. Any criteria or thresholds based on the principal adverse impacts listed in Table 1 of Annex I of Annex I Delegated Regulation SFDR that are used to select, or advise on instruments

BDPL has for 2024 not set any criteria or thresholds based on the PAI.

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Disclaimer

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The provided information herein must be considered as having a general nature and does not, under any circumstances, intend to be tailored to your personal situation. This document does not constitute investment advice and does not constitute independent or objective investment research.
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