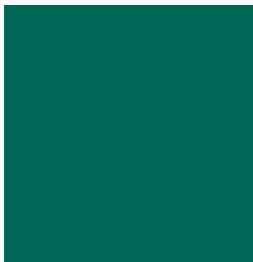


## ESG POLICY



# ESG POLICY

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# I. INTRODUCTION

The purpose of this policy is to explain Cofinimmo's ESG<sup>1</sup> vision. This vision is first implemented through a long-term strategy that places Cofinimmo's various stakeholders, from investors to the community, employees and tenants at the centre.

The term "employee" includes Cofinimmo employees, its managers and, more generally, persons who have been delegated powers to represent the company.

In this context, Cofinimmo undertakes to respect fundamental principles that are inspired by the 10 Principles of the United Nations Global Compact and which translate into concrete actions in Cofinimmo's activity.

For each ESG pillar, this policy explains the commitments made within the company and to stakeholders, while making the link with the different policies defined for each commitment.

# II. POLICY

The ESG Policy set out here aims to define Cofinimmo's ESG commitments, explaining how they fit into the company's overall long-term strategy for ambitious social development and a positive contribution to the community.

## a. Vision

Cofinimmo, a major European real estate player, is committed to a global ESG strategy for its activities.

In parallel with the objective of reducing energy intensity as a long-term objective, as expressed by the 30<sup>3</sup> project and the scientific objective it represents<sup>2</sup>, Cofinimmo is working towards a positive impact in the main aspects of materiality analysis<sup>3</sup>.

The existence of an ambitious ESG strategy is a necessity to ensure the company's long-term value. Cofinimmo's various stakeholders are well aware of this: the number of shareholders looking for socially responsible investments is constantly growing; tenants demand energy-efficient and comfortable buildings; and employees are constantly looking for meaning in their activities.

## b. Commitments

Cofinimmo confirms its commitment to the 10 Principles of the United Nations Global Compact. These are derived from the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention against Corruption.

Through its values and operational approach, Cofinimmo intends to assume its fundamental responsibilities in the areas of human rights, labour, the environment and the fight against corruption.

The 10 principles of the United Nations Global Compact inspire and guide Cofinimmo's ESG Policy and the unique policies that have been developed for each pillar.

1 Corporate social responsibility (CSR) is defined by the European Commission as the voluntary integration by companies of social and environmental concerns in their business activities and relations with stakeholders (ESG aspects, acronym for Environment, Social, Governance).

2 For the scientific details of the 30<sup>3</sup> project, click the link to the Cofinimmo website, [Cofinimmo - Governance & policies](#).

3 For the materiality analysis, click the link to the Cofinimmo website, [Cofinimmo - Materiality analysis](#).

Cofinimmo's ESG Policy focuses on a series of commitments which cover the three pillars of environment, social and governance. For each ESG pillar, Cofinimmo defines a series of policies belonging to that pillar, which are also interconnected thanks to the existence of the ESG Policy, which constitutes their common logic.

Cofinimmo differentiates between external policies, i.e. those that are essential for highlighting Cofinimmo's

commitments and support actions, and internal policies, i.e. those that are essential for defining the guidelines of internal stakeholders and related activities.

The ESG Policy and all related policies are applicable to the Group and are linked to Cofinimmo's three core businesses, namely: portfolio acquisition and redevelopment; portfolio construction and renovation; sustainable portfolio management.

*Cofinimmo aims to have a positive impact on the environment in all its forms and with all the instruments available to Cofinimmo.*

**Principles  
7, 8, 9 of  
the Global  
Compact**

Please refer to the Environmental Policy for details on each commitment.

- Ensure compliance with environmental regulations and other requirements in all geographical areas where Cofinimmo operates.
- Focus on resilience to climate change through mitigation and adaptation plans for Cofinimmo's portfolio and its development.
- Protect the environment and preserve biodiversity through green technologies and the system approach to development projects and operations.
- Reduce water consumption and work towards sustainable management at company and portfolio level, by stimulating the use of technologies but also by raising awareness of those responsible for the day-to-day management of buildings.
- Apply circularity principles for all activities, from property management to renovation projects by partnering with local entities to support the recycling of materials.
- Promote and develop green mobility solutions for employees and tenants.



Principles  
1, 2, 3, 4, 5, 6  
of the Global  
Compact

*Cofinimmo continues to have a positive impact on the social context in which it operates and to work for continuous improvement of the company.*

Please consult the individual policies, as indicated next to each commitment, for more details on the corresponding actions.

- Respect for human rights is a key commitment of Cofinimmo in all its activities and applies to all its stakeholders (Human Rights Policy).
- Ensure that Cofinimmo’s suppliers are aligned with and committed to the same values as Cofinimmo, by respecting a code for sustainable practices (Supplier Code of Conduct).
- Ensure the safety and health of employees and occupants of Cofinimmo buildings. To support the professional development of all employees by promoting respect for differences in culture and origin.
- Actions are promoted to support public institutions and the community, which is consistent with Cofinimmo’s ethical commitments.

Principle 10  
of the Global  
Compact

*Cofinimmo encourages an ethical approach to governance, with regard to external and internal stakeholders, to ensure long-term sustainable growth.*

Please consult the individual policies, as indicated next to each commitment, for a better understanding of sustainable corporate governance at Cofinimmo.

- Implement transparency and adopt ethical behaviour in all processes and procedures involving Cofinimmo’s highest governance bodies (Corporate Governance Charter, Market Abuse Prevention Code).
- Prevent any incident of corruption and ensure the possibility of reporting misconduct for all Cofinimmo employees (Whistleblowing Policy, Anti-corruption, Fraud and Money Laundering Policy).
- Fully integrate ESG factors in the Sustainable Finance Framework.
- Ensure information system security and data protection through a structured approach to ICT1 (Data Protection Statement).
- Follow the SICAFI regime in terms of tax policy, ensuring full compliance with legislation, transparency and alignment with industry best practices.

1 Information and Communication Technologies.



## III. MISCELLANEOUS

### a. Notification and contact

Any questions, violations or concerns relating to this policy can be sent to the compliance officer at the following email address: [compliance@cofinimmo.be](mailto:compliance@cofinimmo.be).

### b. Compliance control process within Cofinimmo

Monitoring of compliance with the ESG Policy is carried out by the Audit Committee, to which the compliance officer reports regularly.