

# STATEMENT ON PRINCIPAL ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS



## 1. SUMMARY

Bank Nagelmackers nv (LEI: 549300FOCVLHBU9A156) considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of Bank Nagelmackers nv.

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January 2022 to 31 December 2022. Year 2022 is the first reference period for which the impact of the PAIs is being calculated. The column of the impact [year n-1] is therefore not applicable to the present statement.

Bank Nagelmackers nv assesses principal adverse impact at entity

level by measuring and monitoring the aggregated negative impact on sustainability factors of in-scope managed portfolios' investments. Bank Nagelmackers nv considers all mandatory principal adverse impact indicators and eight voluntary indicators, defined by the Sustainable Finance Disclosure Regulation (SFDR), subject to data availability and quality. This statement provides details on the different principle adverse indicators and maps policies to identify and prioritise principal adverse impacts on sustainability factors.

This statement applies to in-scope discretionary portfolio management mandates managed by Bank Nagelmackers nv, by designation or delegation, and was validated by the Sustainability Committee on June 23<sup>rd</sup>, 2023.

## 2. DESCRIPTION OF THE PRINCIPAL ADVERSE IMPACTS ON SUSTAINABILITY FACTORS

Table 1: Description of the principal adverse impacts on sustainability factors

Indicators applicable to investments in investee companies

### CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse sustainability indicator	Metric	Impact [year n] <sup>1</sup>	Impact [year n-1] <sup>2</sup>	Explanation	Actions taken, and actions planned and targets set for the next reference period
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG Emissions	2,798.85	NA	Sum of portfolio companies' Carbon Emissions - Scope 1 (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash.
		Scope 2 GHG Emissions	754.29	NA	Sum of portfolio companies' Carbon Emissions - Scope 2 (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash.
		Scope 3 GHG Emissions	31,185.43	NA	Sum of portfolio companies' Scope 3 - Total Emission Estimated (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash.
		Total GHG Emissions	34,748.02	NA	The total annual Scope 1, Scope 2, and estimated Scope 3 GHG emissions associated with the market value of the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).

<sup>1</sup> Bank Nagelmackers has started measuring performance on Principal Adverse Impact as of 31 March 2022. The first results are published in 2023. The first comparison versus the previous year will therefore be available in 2024.

<sup>2</sup> This describes the Bank Nagelmackers approach for mandates with a sustainable strategy, classified as Article 8 or Article 9, managed by Bank Nagelmackers. A different approach might be applied when explicitly requested (opt-out principle) by the counterparty for discretionary portfolio management services.

Greenhouse gas emissions	<b>2. Carbon footprint</b>	Carbon Footprint	552.91	NA	The total annual Scope 1, Scope 2, and estimated Scope 3 GHG emissions associated with 1 million EUR invested in the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	GHG emissions and carbon footprint combined have a high materiality within environmental factors in Bank Nagelmackers' ESG Scoring Model.
	<b>3. GHG Intensity of investee companies</b>	GHG intensity of investee companies	813.30	NA	The portfolio's weighted average of its holding issuers' GHG Intensity (Scope 1, Scope 2 and estimated Scope 3 GHG emissions/EUR million revenue).	GHG Intensity has the highest materiality of all environmental factors in Bank Nagelmackers' ESG Scoring Model.
	<b>4. Exposure to companies active in the fossil fuel sector</b>	Share of investments in companies active in the fossil fuel sector	9.45%	NA	The percentage of the portfolio's market value exposed to issuers with fossil fuels related activities, including extraction, processing, storage and transportation of petroleum products, natural gas, and thermal and metallurgical coal.	Fossil fuel sector exposure has a high materiality within environmental factors in Bank Nagelmackers' ESG Scoring Model.
	<b>5. Share of non-renewable energy consumption and production</b>	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	71.46%	NA	The portfolio's weighted average of issuers' energy consumption and/or production from non-renewable sources as a percentage of total energy used and/or generated.	Incorporated in Bank Nagelmackers' ESG Scoring Model with a medium materiality within environmental factors.
	<b>6. Energy consumption intensity per high impact climate sector</b>	NACE Code A (Agriculture, Forestry and Fishing)	0.50	NA	The portfolio's weighted average of Energy Consumption Intensity GwH/ million EUR revenue) for issuers classified within NACE Code A (Agriculture, Forestry and Fishing)	Incorporated in Bank Nagelmackers' ESG Scoring Model with a low materiality within environmental factors.
		NACE Code B (Mining and Quarrying)	1.42	NA	The portfolio's weighted average of Energy Consumption Intensity (GwH/ million EUR revenue) for issuers classified within NACE Code B (Mining and Quarrying)	
		NACE Code C (Manufacturing)	0.69	NA	The portfolio's weighted average of Energy Consumption Intensity (GwH/ million EUR revenue) for issuers classified within NACE Code C (Manufacturing)	
		NACE Code D (Electricity, Gas, Steam and Air Conditioning Supply)	7.13	NA	The portfolio's weighted average of Energy Consumption Intensity (GwH/ million EUR revenue) for issuers classified within NACE Code D (Electricity, Gas, Steam and Air Conditioning Supply)	
		NACE Code E (Water Supply; Sewerage, Waste Management and Remediation Activities)	1.26	NA	The portfolio's weighted average of Energy Consumption Intensity (GwH/ million EUR revenue) for issuers classified within NACE Code E (Water Supply; Sewerage, Waste Management and Remediation Activities)	
		NACE Code F (Construction)	0.13	NA	Supply; Sewerage, Waste Management and Remediation Activities)	
		NACE Code G (Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles)	0.12	NA	The portfolio's weighted average of Energy Consumption Intensity (GwH/ million EUR revenue) for issuers classified within NACE Code F (Construction)	
		NACE Code H (Transportation and Storage)	2.00	NA	The fund's weighted average of Energy Consumption Intensity (GwH/ million EUR revenue) for issuers classified within NACE Code G (Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles)	
		NACE Code L (Real Estate Activities)	0.38	NA	The portfolio's weighted average of Energy Consumption Intensity (GwH/ million EUR revenue) for issuers classified within NACE Code H (Transportation and Storage)	

<b>Biodiversity</b>	<b>7. Activities negatively affecting biodiversity-sensitive areas</b>	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.40%	NA	The percentage of the portfolio's market value exposed to issuers' that reported having operations in or near biodiversity sensitive areas and have been implicated in controversies with severe or very severe impacts on the environment.	Incorporated in Bank Nagelmackers' ESG Scoring Model with a medium materiality within environmental factors.
<b>Water</b>	<b>8. Emissions to water</b>	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	94.61	NA	The total annual wastewater discharged (metric tons reported) into surface waters as a result of industrial or manufacturing activities associated with 1 million EUR invested in the portfolio. Companies' water emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	Incorporated in Bank Nagelmackers' ESG Scoring Model with a low materiality within environmental factors.
<b>Waste</b>	<b>9. Hazardous waste and radioactive waste ratio</b>	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	9.53	NA	The total annual hazardous waste (metric tons reported) associated with 1 million EUR invested in the portfolio. Companies' hazardous waste is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	Incorporated in Bank Nagelmackers' ESG Scoring Model with a low materiality within environmental factors.

**INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS**

<b>Social and employee matters</b>	<b>10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises</b>	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	0.93%	NA	The percentage of the portfolio's market value exposed to issuers with very severe controversies related to the company's operations and/or products.	Violations of UNGC principles and OECD Guidelines and companies without policies to monitor compliance with these nor grievance/ complaints handling mechanisms to address violations are given the highest materiality in Bank Nagelmackers' ESG Scoring Model among social factors.
	<b>11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises</b>	Average unadjusted gender pay gap of investee companies	41.98%	NA	The percentage of the portfolio's market value exposed to issuers that are not signatories in the UN Global Compact.	Exclusion of companies: more information is available via Bank Nagelmackers' Exclusion Policy.
	<b>12. Unadjusted gender pay gap</b>	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	14.30%	NA	The portfolio holdings' weighted average of the difference between the average gross hourly earnings of male and female employees, as a percentage of male gross earnings.	Incorporated in Bank Nagelmackers' ESG Scoring Model with a medium materiality within social factors.
	<b>13. Board gender diversity</b>	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	35.07%	NA	The portfolio holdings' weighted average of the ratio of female to male board members.	Incorporated in Bank Nagelmackers' ESG Scoring Model with a medium materiality within social factors.
	<b>14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)</b>	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.12%	NA	The percentage of the portfolio's market value exposed to issuers with an industry tie to landmines, cluster munitions, chemical weapons or biological weapons. Note: Industry ties includes ownership, manufacturing and investments. Ties to landmines do not include related safety products.	Incorporated in Bank Nagelmackers' ESG Scoring Model with a medium materiality within social factors.  Exclusion of companies involved in the production of controversial weapons or weapon parts (Mahoux Act). More information is available via Bank Nagelmackers' <a href="#">Exclusion Policy</a> .

Indicators applicable to investments in sovereigns and supranationals

CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

CLIMATE AND OTHER ENVIRONMENT RELATED MATTERS						
Adverse sustainability indicator		Metric	Impact [year n]	Impact [year n-1]	Explanation	Actions taken, and actions planned and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	440.64	NA	The portfolio's weighted average of sovereign issuers' GHG Emissions Intensity (Scope 1, 2 and 3 emissions/ EUR M GDP)	GHG Intensity has the highest materiality of all environmental factors in Bank Nagelmackers' ESG Scoring Model.
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	4  4.32%	NA	The portfolio's number of unique sovereign issuers with European External Action Service (EEAS) restrictive measures (sanctions) on imports and exports  The portfolio's percentage of unique sovereign issuers with European External Action Service (EEAS) restrictive measures (sanctions) on imports and exports	Incorporated in Bank Nagelmackers' ESG Scoring Model with the highest materiality within social factors.  Exclusion of sovereigns subject to international sanctions or with systematic corruption or severe neglect of basic social and political rights.  More information is available via Bank Nagelmackers' <a href="#">Exclusion Policy</a> .

Indicators applicable to investments in real estate assets

CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse sustainability indicator		Metric	Impact [year n]	Impact [year n-1]	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

Additional climate and other environmental-related indicators

CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Indicators applicable to investments in investee companies

Indicators applicable to investments in investee companies						
Adverse sustainability indicator		Metric	Impact [year n]	Impact [year n-1]	Explanation	Actions taken, and actions planned and targets set for the next reference period
Emissions	4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	28.07%	NA	The percentage of the portfolio's market value exposed to issuers without a carbon emissions reduction target aligned with the Paris Agreement.	Incorporated in Bank Nagelmackers' ESG Scoring Model with a high materiality within environmental factors.



**INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS,  
ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS**
**Indicators applicable to investments in investee companies**

Adverse sustainability indicator		Metric	Impact [year n]	Impact [year n-1]	Explanation	Actions taken, and actions planned and targets set for the next reference period
Social and employee matters	7. Incidents of discrimination	1. Number of incidents of discrimination reported in investee companies expressed as a weighted average	0.00	NA	The total number of severe and very severe discrimination and diversity controversies associated with EUR 1 million invested in the portfolio. It is calculated as the weighted average of Number of Severe and Very Severe Discrimination and Diversity Controversies per company divided by the company's most recently available enterprise value including cash (EVIC).	Incorporated in Bank Nagelmackers' ESG Scoring Model with a high materiality within social factors.
		2. Number of incidents of discrimination leading to sanctions in investee companies expressed as a weighted average	NA	NA	Please note that we are currently unable to provide any data for "Number of incidents of discrimination leading to sanctions in investee companies expressed as a weighted average" due to the ambiguity of the definition. While we can report on the number of incidents of discrimination or provide a list of companies on the EU sanctions list, there is no evidence to suggest the causality of the incidents and the imposition of sanctions and trade restrictions.	
Anti-corruption and anti-bribery	15. Lack of anti-corruption and anti-bribery policies	Share of investments in entities without policies on anti-corruption and anti-bribery consistent with the United Nations Convention against Corruption	5.95%	NA	The percentage of the portfolio's market value exposed to issuers without an anti-corruption and anti-bribery policy consistent with the United Nations Convention against Corruption.	Incorporated in Bank Nagelmackers' ESG Scoring Model with a high materiality within social factors.

**Indicators applicable to investments in sovereigns and supnationals**

<b>Social</b>	<b>19. Average freedom of expression score</b>	Measuring the extent to which political and civil society organisations can operate freely including a quantitative indicator explained in the explanation column	69.08	NA	The weighted average of the portfolio's issuers' Press Freedom score (Countries with lower scores demonstrate higher press freedom. Data source: Freedom house).	Incorporated in Bank Nagelmackers' ESG Scoring Model with a medium materiality within social factors.
<b>Governance</b>	<b>21. Average corruption score</b>	Measure of the perceived level of public sector corruption using a quantitative indicator explained in the explanation column	61.02	NA	The weighted average of portfolio's issuers' Corruption Perception Index score (measures the degree to which public sector corruption is perceived to exist in different countries around the world. Data source: Transparency International. Countries with lower score are perceived to be more corrupt).	Incorporated in Bank Nagelmackers' ESG Scoring Model with a medium materiality within governance factors.  Exclusion of sovereigns with systematic corruption.  More information is available via Bank Nagelmackers' <a href="#">Exclusion Policy</a> .
	<b>22. Non-cooperative tax jurisdictions</b>	Investments in jurisdictions on the EU list of non-cooperative jurisdictions for tax purposes	1.93%	NA	The percentage of the portfolio's market value exposed to issuers' domiciled in jurisdictions on the EU list of non-cooperative jurisdictions for tax purposes.	Incorporated in Bank Nagelmackers' ESG Scoring Model with a medium materiality within social factors.

	<b>23. Average political stability score</b>	Measure of the likelihood that the current regime will be overthrown by the use of force using a quantitative indicator explained in the explanation column	6.77	NA	The weighted average of the portfolio's issuers' Stability & Peace score (Assesses the level of stability and peace in a region. This sub-factor is assessed using two data points: (1) political stability and absence of violence/ terrorism, which captures the perceptions of the likelihood that the government will be destabilized or overthrown by unconstitutional or violent means, including politically motivated violence and terrorism; and 2) global peace index, which measures the relative position of nations' and regions' peacefulness by gauging ongoing domestic and international conflict, safety and security in society, and militarization in different regions. Regions with high political instability and violence and conflict score poorly. (Score: 0-10)).	Political stability and rule of law scores are incorporated in Bank Nagelmackers' ESG Scoring Model and have the highest materiality within governance factors.
	<b>24. Average rule of law score</b>	Measure of the level of corruption, lack of fundamental rights, and the deficiencies in civil and criminal justice using a quantitative indicator explained in the explanation column	0.84	NA	The weighted average of the portfolio's issuers' Rule of Law score (Capturing perceptions of the extent to which agents have confidence in and abide by the rules of society, and in particular the quality of contract enforcement, property rights, the police, and the courts, as well as the likelihood of crime and violence. Data source: Worldwide Governance Indicators (WGI). Countries with higher score demonstrate better rule of law.).	

### 3. DESCRIPTION OF POLICIES TO IDENTIFY AND PRIORITISE PRINCIPAL ADVERSE IMPACTS ON SUSTAINABILITY FACTORS

#### 1. Methodology to identify and prioritise principal adverse impacts

The described methodology that integrates the principle adverse impacts is applied throughout all mandates classified as article 8 or article 9 managed by Bank Nagelmackers, by designation or delegation, as well as Bank Nagelmackers' own investment portfolio in debt and/or equity instruments. While by standard, mandates will follow the methodology, clients have the possibility to opt-out if they explicitly inform us their decision to do so.

Bank Nagelmackers uses several exclusion strategies to avoid investing in issuers that cause principal adverse impacts on sustainability factors through the application of its exclusion policy. In all funds and mandates managed by Bank Nagelmackers, we refrain from investing in companies with any revenue from controversial weapons and sovereigns that systematically violate basic human, social or political rights or are subject to sanctions by the UN Security Council, European Union and US sanctions list. The exclusion policy contains additional activity-based and norms-based exclusions for all SFDR article 8 or 9 products managed by Bank Nagelmackers, such as for companies that breach the UN Global Compact and OECD Guidelines for Multinational Enterprises.

More information is available via Bank Nagelmackers' [Exclusion Policy](#).

Bank Nagelmackers has also developed its own ESG scoring model whereby companies and sovereigns within its investment universe

are analysed and ranked based on environmental, social and governance indicators that include the principal adverse impacts. The PAIs are integrated into the ESG analysis through an assessment of the materiality of each indicator based on its relevance in terms of probability of occurrence and severity for each sector or country type (developed vs. emerging), data availability and data quality. Through the indicators and their materiality, each issuer's overall ESG performance is ranked versus its peers into an ESG rating taking into account its company sector, region and size or classification as developed or emerging country for sovereigns. On a product level, both for funds and mandates managed by Bank Nagelmackers, as a minimum standard, exclusions apply to issuers that rank lowest within the product-specific universe. The Sustainability Committee evaluates the results of the ESG ratings on a monthly basis.

Investments in external fund units within funds or mandates managed by Bank Nagelmackers are subject to a due diligence as part of the fund selection process ('7P Methodology'). It includes an assessment of the principles for sustainable investment and ESG performance based on the principle adverse impacts reported by financial market participants. External fund units may contain investments that Bank Nagelmackers would otherwise exclude based on the criteria above. In these cases, Bank Nagelmackers engages with the external fund provider and strives to find common values.

More information is available via Bank Nagelmackers' [Sustainability Risk Policy](#).

## 2. Governance

The proprietary ESG ratings are subject to validation by the Sustainability Committee, which takes place on a monthly basis. When a particularly weak rating or deterioration in rating is detected, the committee debates and decides on the appropriate action to undertake. Possible actions range from either excluding the company or sovereign from investment within all or certain types of products. A second action consists of engaging with the company with a specific objective to attain within a well-defined time frame. Finally, the committee can decide to undertake no action at all when the rating is judged not to adequately reflect the ESG performance of the issuer and needs further monitoring.

The Sustainability Committee decisions are made available to all portfolio and fund managers, who are responsible for the implementation of the decisions. The Sustainability Committee is responsible for monitoring, controlling and reporting that Bank Nagelmackers' products are aligned with these decisions.

The Sustainability Committee has approved this statement on 23/06/2023.

## 3. Data sources

Bank Nagelmackers uses a combination of different data sources to assess the principle adverse impacts. These sources include third party data providers that are complementary in their methodology or coverage, self-reported company data and information from NGOs. The selection of third party data providers was performed through an extensive RFP process and due diligence that compared several data vendors in terms of data availability, data quality, methodology and relevance for our investment universe. These criteria are evolving and continually improving. As such, the Sustainability Committee will perform periodic reviews of third party data providers in the future to make sure to assure a high-quality assessment of issuers within our investment universe is possible. Bank Nagelmackers will disclose of any data gap on principle adverse impacts when accurate data is not available, while taking actions to obtain them through discussions with the relevant data providers or other sources. As at 30 June 2023, the following table lists an overview of the selected third party vendors.

Table 2: Overview of third-party data sources

Use case	Explanation	Scope	Data source
<b>Corporate ratings</b>	Assessment of a company's environmental, social and governance performance	Investee companies	ISS
<b>PAI</b>	Mandatory and additional principle adverse impacts	Investee companies & sovereigns	MSCI
<b>PAI</b>	Mandatory and additional principle adverse impacts	External fund units	Morningstar
<b>Negative screening - Sanctioned Securities List</b>	Securities sanctioned by the EU, US or United Nations	Investee companies & sovereigns	SIX
<b>Norms-based screening</b>	Assessment of companies' misalignment with or violations of individual global norms and conventions including the United Nations Global Compact Principles (UNGC), the International Labour Organization's (ILO) conventions and the United Nations Guiding Principles on Businesses and Human Rights	Investee companies	MSCI
<b>Activity-based Controversies</b>	Screening of a business' involvement in controversial activities, including alcohol, gambling, tobacco, adult entertainment, defense & weapons	Investee companies	MSCI
<b>Sustainable Development Goals</b>	Measurement of a country's relative performance across each of the UN Sustainable Development Goals (SDGs)	Investee sovereigns	Refinitiv
<b>Sustainable Development Goals</b>	Measurement of a company's relative performance across each of the UN Sustainable Development Goals (SDGs)	Investee companies	Morningstar
<b>Corporate governance</b>	Data, analysis and recommendations on a companies' corporate governance	Investee companies	ISS

## 4. ENGAGEMENT POLICIES

Bank Nagelmackers is convinced that engagement with investee companies to improve ESG practices is essential to preserve and enhance the value of our clients' assets. Engagement can be performed individually or through collaborative engagement initiatives. Individual engagement is targeted at external asset managers for third-party fund holdings and small companies with a local anchorage in the Belgian market.

Bank Nagelmackers has determined targeted themes for engagement that are aligned with our investment strategies that consider the principle adverse impacts:

- Environmental: focus on climate change and reduction of GHG emissions (PAI 1-6) and companies without carbon emissions reduction initiatives
- Social: respect for human, social & labour rights in line with UN Global Compact, OECD Guidelines for Multinational Enterprises (PAI 10-11) and anti-discrimination measures
- Governance: focus on board performance and improved gender diversity (PAI 13).

Aside from these themes, another area of focus is to improve access to key data points in non-financial information related to sustainable issues. This can be especially a challenge for smaller-sized companies. However we believe that through engaging with these companies and challenging them with sector or industry best practices, we can play our role to improve disclosure on relevant ESG issues.

Bank Nagelmackers is also signatory and participant of the CDP Main Campaign. Wherever material issues present and priorities are aligned, we are open to join efforts with other stakeholders or investors.

More information is available via Bank Nagelmackers' [Engagement Policy](#).

## 5. REFERENCES TO INTERNATIONAL STANDARDS

Bank Nagelmackers is a signatory of the United Nations Principles for Responsible Investment (UN PRI). The Principles for Responsible Investment were developed by an international group of institutional investors reflecting the increasing relevance of environmental, social and corporate governance issues to investment practices. ESG issues form an integral part of our fiduciary role to act in the best long-term interest of our beneficiaries. Bank Nagelmackers is also a Carbon Disclosure Project (CDP) signatory. Through this collaborative engagement initiative, companies are requested to disclose data on their environmental impact.

## 1. Gender diversity

Bank Nagelmackers is a signatory of the Women in Finance charter, an initiative to improve gender diversity and equal opportunity in the financial sector. As a signatory, Bank Nagelmackers is committed to measure the glass ceiling within its organization and establish an action plan to improve gender diversity and inclusion within the organization. This commitment extends towards our assessment of investee companies through material indicators as equal pay and board gender diversity in our ESG Scoring Model.

Link to principal adverse impacts: PAI 12 (Unadjusted gender pay gap) and PAI 13 (Board gender diversity).

## 2. UN Global Compact, OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights

Bank Nagelmackers screens investee companies on norms based on the UN Global Compact (UNGC), the OECD Guidelines for Multinational Enterprises, the International Labour Organization's (ILO) conventions and the United Nations Guiding Principles on Businesses and Human Rights. Companies that fail compliance with the UNGC are excluded from investment, while companies on a watch list warrant ongoing monitoring until further information reveals whether or not one or more controversy cases constitute a breach of the Global Compact. The norms-based exclusions contribute to an exclusion list that is updated each quarter. Relevant data sources include the MSCI ESG Global Norms Screening.

Link to principal adverse impacts: PAI 10 (Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises and PAI 11 (Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises).

## 6. HISTORICAL COMPARISON

The first historical comparison will be available by June 2024.