ESG approach

ESG MANAGEMENT

Unless expressly stated otherwise, the following reflects Befimmo's situation as at 31 December 2022.

At Board level

THE BOARD OF DIRECTORS

The Befimmo Board of Directors pursues sustainable value creation by setting the Company's strategy within the framework of the ESG policy that it defines, establishing effective, responsible and ethical leadership, and monitoring its performance. To do so, the Board develops an inclusive approach which balances the legitimate interests and expectations of its shareholding structure and those of other stakeholders.

Befimmo has fully integrated the sustainability principles within its overall strategy and day-to-day operations by anticipating on environmental, social and governance evolutions. The Board of Directors has ultimate oversight of ESG risks and opportunities at a strategic level, alignment with business strategy and progress against most significant ESG commitments.

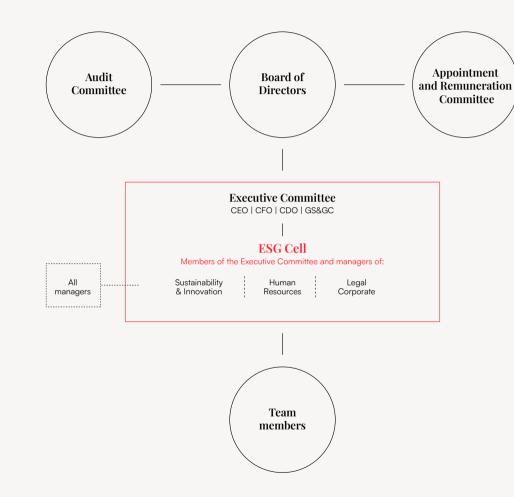
In line with this integrated strategy, the Board defines the environmental (including climate- and sustainability-related issues), social and governance orientations and strategic targets. It further approves budgets and major decisions related to this strategy.

THE AUDIT COMMITTEE

The Audit Committee is responsible, amongst others, for the monitoring of the Enterprise Risk Management and mitigation strategies.

The Committee also monitors the proper implementation of adequate and effective internal control systems, as well as compliance and ethics policies by the Executive Committee.

ESG GOVERNANCE STRUCTURE





THE APPOINTMENT AND REMUNERATION COMMITTEE

In the performance of its duties, the Appointment and Remuneration Committee pays specific attention to the ESG aspects both at the level of the appointment as at the level of the remuneration of the Directors and Officers.

Befimmo's remuneration policy aims to promote the creation of sustainable value within the Company, and to contribute to the implementation of its strategy, in particular by:

- Setting qualitative and quantitative performance criteria for the members of the Executive Committee, that are in line with Befimmo's long-term objectives;
- Implementing a long-term incentive plan spread over several years;
- Ensuring diversity is reflected in the composition of the team.

In accordance with its terms of reference, the Board of Directors carried out a self-assessment in 2021 and entrusted this task to an external expert in corporate governance, which conducted a thorough assessment of the composition and operation of the Board of Directors, its specialised Committees and the interaction between the Board of Directors and the Executive Officers. This self-assessment, which also aimed to gauge that Befimmo's governance efficiently supports its strategy and takes into account the evolving environment in which it operates, included reflections on Befimmo's internal ESG governance.

At strategic level

The ESG Cell is a cross-functional team that provides a forum for regular and in-depth discussions on ESG aspects. It is entrusted with the following responsibilities:

- Monitoring of and compliance with ESG regulations;
- Monitoring and analysing market trends and developments and share insights with key stakeholders;
- Developing proposals, coordinating the integration of ESG aspects into core activities and driving implementation;
- Reporting on implemented actions;
- Ensuring that operational projects are in line with the integrated strategy.

To mitigate the risk of separating ESG discussions from more general business, financial and strategy discussions, the Cell consists of eight strategic members:

- The Chief Executive Officer (CEO) (member of the Executive Committee);
- The Chief Financial Officer (CFO) (member of the Executive Committee);
- The Chief Development Officer (CDO) (member of the Executive Committee);
- The General Counsel & Secretary General (GC&SG) (member of the Executive Committee);
- The Chief Sustainability & Innovation Officer (CS&IO);
- The Chief Portfolio Officer (CPO):
- The Head of Environmental Management (HEM);
- The Head of Human Resources (HHR).

This Cell meets two times a year.

Sustainability topics are also discussed during Executive Committee and Managers' meetings.

At operational level

Sustainability topics are addressed on a weekly basis during department meetings of Sustainability & Innovation.

SUSTAINABILITY & INNOVATION

The Chief Sustainability & Innovation Officer, member of the ESG Cell, reports directly to the CEO. Her role is both strategic (developing strategy on ESG aspects, managing relations with stakeholders) and operational (coordinating and running sustainability projects, managing the 2030 Action Plan, acting as in-house consultant for other departments, and encouraging staff to embrace change). All activities related to social responsibility, innovation, digitalisation, and sustainability are achieved in co-operation with Befimmo's in-house Sustainability & Innovation team.

ENVIRONMENTAL MANAGEMENT

The Environmental Management team is part of the Sustainability & Innovation department and consists of five specialists with the task of improving the environmental performance of the portfolio. These specialists include the Green Adviser who monitors the effectiveness of energy investments on the ground while ensuring a high level of comfort for tenants. This team meets regularly in order to implement the 2030 Action Plan.

HUMAN RESOURCES

The Human Resources department is responsible for raising awareness amongst all members of the team to pay attention to sustainability, for following-up initiatives, and for continuing to develop Befimmo's strong corporate culture. HR is also responsible for monitoring social aspects like diversity and inclusion, talent retention, equal opportunities and global well-being among the team.

LEGAL CORPORATE

The Legal Corporate department closely monitors the ESG regulatory initiatives and collaborates in identifying and executing the action points, and defining priorities with regards to ESG aspects.

PROPERTY MANAGEMENT

Property Managers also have an important role to play in ensuring the health and well-being of occupants.

TEAM

Other team members are also entrusted with specific responsibilities relating to in ESG aspects, such as the Head of Legal Real Estate, Chief Portfolio Officer, Head of Investments, Internal Auditor, etc.

Generally speaking, the entire team is involved in the ESG approach of the Company, depending on the field of expertise, and is aware of the major impact of the real-estate sector on the environment. The targets described in the 2030 Action Plan for each department are the driving force towards a more sustainable reflection.



ESG PRIORITIES

Befimmo constantly monitors external drivers that are shaping the Company's activities to select and prioritise its material topics and commitments.

This approach is a continuous process fed by the permanent dialogue maintained with Befimmo's stakeholders, aiming to maintain a solid connection with the way their expectations evolve over time and allowing Befimmo to adapt incrementally.

This approach helps Befimmo to determine its material topics, their positive and negative impact, and their relevance. The entire ESG strategy is then challenged according to these evolving material topics and adapted if necessary. The ESG strategy is monitored through the 2030 Action Plan, which includes ambitious targets to continue improving Befimmo's ESG performance.

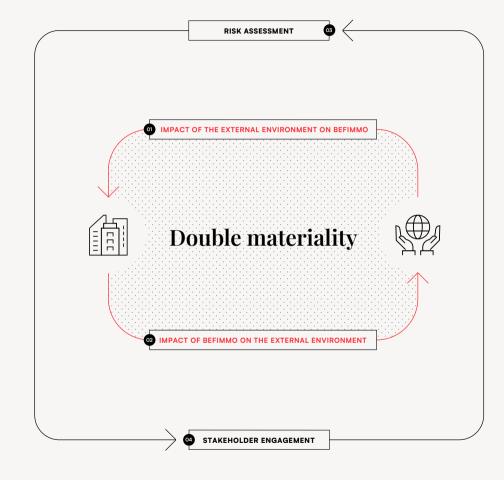
01. Impact of the external environment on Befimmo

Befimmo monitors external trends through market analysis, participation in ESG assessments (GRESB, CDP), and the analysis of frameworks and standards such as TCFD, GRI, EPRA, the SDGs and the UN Global Compact in order to understand the driving forces of the moment.

02. Befimmo's impact on the external environment

One of Befimmo's targets is to manage and minimise the impact an organisation's activities have on an environment, to mitigate risks of harmful effects on the natural environment and protect the health of human being but also to ensure compliance with laws and regulations. All specific initiatives taken by the Company to reduce its impact on the external environment are thoroughly described in the following sections of this chapter.

DOUBLE-MATERIALITY APPROACH



03. Risk assessment

Befimmo carried out a risk analysis in early 2019, which led to a full review of the risk matrix in late 2019. This risk matrix is reviewed annually as part of a three-year plan by the Audit Committee. The corporate risk rules provide for a formal update of the risk factors, twice a year when the half-yearly and annual financial reports are drafted. This update is then presented to and discussed in the Executive Committee. Finally, the document is transmitted to the Audit Committee for review, and to the Board of Directors for formal approval.

In 2021, Befimmo included climate change in its reporting and Enterprise Risk Management (ERM) process as part of a broader strategic risk focus on ESG aspects, alongside the two existing non-financial risks (environmental and social). These three risks are detailed in the Risk Factors chapter of this Report.

N RISK FACTORS, P.145

Impact from the external

In addition to the general risks, the table hereafter details all ESG risks according to the principle of double materiality, and shows the clear interaction between the risks related to the core activity of the Company and the ESG risks.

ESG RISKS - 1/4

Risks	environment on Befimmo	on the external environment	Actions
ENVIRONMENTAL RISKS			
Climate			
Physical risk			
 - Acute: Extreme weather events (e.g. storms, floods, etc.); - Chronic: Changes in precipitation patterns and extreme variability in weather patterns (e.g. increased average temperatures, etc.). 	- Possible reduction in the value of buildings (P1); - Costs of refurbishing the affected building (P2); - Degradation and obsolescence of buildings (P3); - Interruption or delay of construction works (S3).	/	 Contribute to climate change mitigation, p.69; Contribute to climate change adaptation, p.75; Use ESG regulations to accelerate the sustainability transition, p.99; Promote green investment opportunities, p.101; Maintain a transparent communication, p.102.

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SG RISKS - 2/4

Risks	Impact from the external environment on Befimmo	Befimmo's impact on the external environment	Actions
ENVIRONMENTAL RISKS			
Climate			
Transition risks			
Current/Emerging regulation - Carbon pricing mechanisms; - Enhanced emissions-reporting obligations; - Mandates on and regulation of existing products and services. Legal - Exposure to litigation.	 Possible reduction in the value of buildings (P1); Higher expenses for reporting; Degradation and obsolescence of buildings (P3). One or more of the Company's properties does not immediately meet all the applicable new standards and regulations (R1).	/	 Contribute to climate change mitigation, p.69; Contribute to climate change adaptation, p.75; Use ESG regulations to accelerate the sustainability transition, p.99; Promote green investment opportunities, p.101; Maintain a transparent communication, p.102.
Technology - Substitution of existing products and services with lower emissions options.	- Degradation and obsolescence of buildings (P3).	/	
Market			
 Changing customer behaviour (sustainable buildings, sustainable company); Increased cost of raw materials, waste treatment, energy, water. 	 Possible reduction in the value of buildings (P1); Degradation and obsolescence of buildings (P3); Adjustment of rents (P4); Decline in occupancy rates and a reduction in the operating results of the portfolio (S2); Interruption or delay of construction works (S3); Change in perception of the Company's credit risk profile (F2). 		
Reputation - Increased stakeholder concern or negative stakeholder feedback.	- Adverse repercussions, notably when negotiating lease agreements or seeking financing.	/	



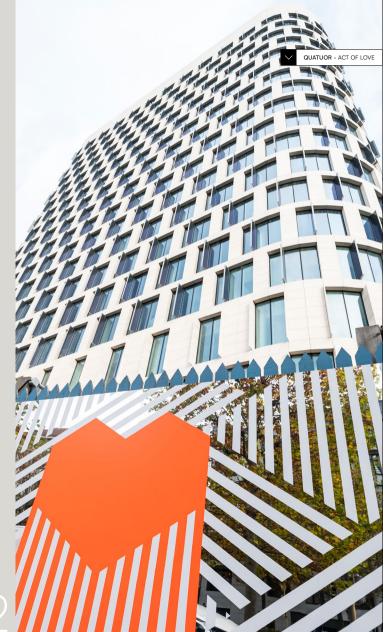
SG RISKS - 3/4

Risks	Impact from the external environment on Befimmo	Befimmo's impact on the external environment	Actions
ENVIRONMENTAL RISKS			
Sustainable buildings			
Non-performing buildings - High energy consumption and CO₂ emissions; - High water consumption; - Presence of polluting materials; - Lack of green spaces; - Lack of active mobility solutions.	Impact of transition risks: - Current/Emerging regulation; - Legal; - Technology; - Market; - Reputation.	 Contribution to climate change through CO₂ emissions; Contribution to water resource pressure through water consumption and soil sealing; Contribution to depletion of natural resources and climate change through use of raw materials; Contribution to biodiversity loss through soil sealing and pollution; Impacts on citizens' health and well-being (flooding, temperature control, air pollution); Contribution to climate change, air pollution and traffic congestion through push to use the car. 	 Contribute to climate change mitigation, p.69; Contribute to climate change adaptation, p.75; Contribute to the sustainable use and protection of water, p.76; Contribute to the transition to a circular economy, p.77; Contribute to pollution prevention and control, p.78; Contribute to the protection and restoration of biodiversity, p.79; Use certification systems to deliver sustainable assets, p.80 Create innovative and sustainable buildings, p.81; Provide buildings accessible through sustainable transport systems, p.82.
Poorly-located buildings - Building not accessible by public transport; - Presence of soil pollution.	Impact of transition risks: - Current/Emerging regulation; - Legal; - Technology; - Market; - Reputation.	 Contribution to climate change, air pollution and traffic congestion through push to use the car; Causing environmental pollution, which generates potentially high costs for society: health costs, clean-up costs (waste treatment, soil remediation, etc.) and loss of ecosystems. 	 Contribute to pollution prevention and control, p.78; Provide buildings accessible through sustainable transport systems, p.82.



Risks	Impact from the external environment on Befimmo	Befimmo's impact on the external environment	Actions	
SOCIAL RISKS				
External stakeholders	Impact of transition risks:	- Impact on the well-being and health.	- Build and animate communities, p.93;	
- The building does not meet the expectations of the	- Legal;		- Improve comfort, security and safety, p.94;	
market in terms of comfort, services, safety and health.			- Integrate buildings into cities, p.96.	
Team				
- Difficulty in attracting and retaining staff;	- A loss of key skills in the Company could lead		- Take care of the team and the community, p.87.	
- Lack of staff engagement or motivation.	to a delay in achieving some of its objectives.			
GOVERNANCE RISKS				
GOVERNANCE RISKS	Impact of transition risks:			
	Impact of transition risks: - Legal;	/	- Behave ethically, p.98;	
Ethics	·	1	- Behave ethically, p.98; - Adopt a due diligence strategy, p.100.	
Ethics - Bribery and non-compliance with regulations	- Legal;	/	• •	
Ethics - Bribery and non-compliance with regulations on advocacy:	- Legal;	1	• •	

Each of these non-financial risks is closely monitored throughout the year by specific departments who will implement mitigation and prevention actions whenever necessary. The departments concerned are mainly Environment, Human Resources, Property Management and Legal Corporate.



04. Stakeholder engagement

BILATERAL COMMUNICATION METHOD

Befimmo brings together many players at the different stages of its buildings' life cycle. In order to best meet individual expectations and concerns of its stakeholders, Befimmo strives to offer a tailor-made communication for each stakeholder group. Each stakeholder is therefore approached differently, by a specific team member with the best knowledge of the subject matter, and using the most appropriate communication method.

Conducting a constant and proactive dialogue with its stakeholders ensures that the Company keeps in step with their expectations and a constantly changing society. Alongside electronic channels, the Company gives preference, whenever possible, to direct face-to-face contacts that strengthen human bonds and allow qualitative exchanges that transcend figures and surveys. Moreover, a close connection and a trust-based relationship are the best ways for Befimmo to move forward in a positive societal direction.

Therefore, the Company regularly takes part in seminars and conferences, gives interviews with journalists or presentations for associations.

But the Company is also open to communication and contacts from stakeholders. All stakeholder groups are included in the regular materiality exercise. Tenants have a dedicated hotline and Helpsite to get in touch with Property Management. Moreover, the Whistleblowing Policy enables Befimmo's staff to notify infringements to (1) the rules of EU law in the areas listed by the Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law, and (2) in general, any other inringement of Befimmo's internal policies, to a central contact point within Befimmo, in complete confidentiality and without fear of reprisals in the broadest sense.

In 2022, no notifications were registered within the framework of the Whistleblowing Policy.

The detailed information on stakeholder engagement can be found in the Non-financial statements of the present Report.

NON-FINANCIAL STATEMENTS: STAKEHOLDER ENGAGEMENT, P.238

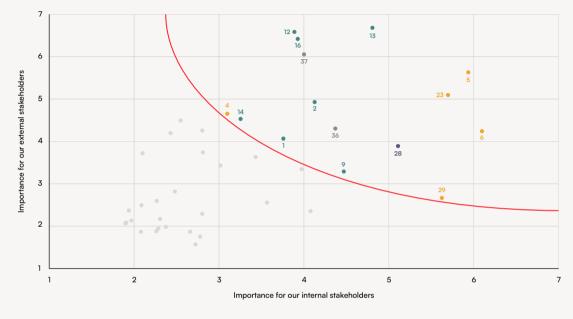
MATERIALITY EXERCISE

In 2020, Befimmo reviewed its materiality matrix to identify its ESG-related priorities. The Company therefore approached a diversified panel of external and internal stakeholders, who allowed the Company to gather various interesting points of view regarding its priorities through interviews, workshops or an online survey. Through this materiality matrix, Befimmo has then identified and prioritised the environmental, social and governance aspects, taking into account the expectations of all stakeholders. 15 of these ESG aspects were underlined as a priority for Befimmo to work on.

The results of the materiality assessment laid the foundations for the design of Befimmo's 2030 Action Plan, which will be detailed hereafter.

The next materiality exercise will take place in 2023.

MATERIALITY MATRIX



EN	VIRONMENT	sc	CIAL	GO	VERNANCE
1	Architectural quality	4	Participation of stakeholders in the project development process	28	Ethics and transparency
2	Mixed functions	5	Safety and health of occupants		
9	Flexibility and adaptability of the buildings	6	Comfort and well-being of occupants		
12	Biodiversity	23	Communication with occupants		
13	Energy consumption	29	Dialogue employee/employer		
14	Water consumption				
16	Circular economy				
TR	ANSVERSE ISSUES				

36 Innovation

37 Integration of ESG challenges within the investments, management and risk control policy



STAKEHOLDERS ENGAGEMENT

Befimmo has identified and mapped its external and internal stakeholders as follow:

Stakeholders	Expectations	Responses and communication mode	Frequency	
Financial community	> Financial and strategic transparency > In line with corporate governance principles > Ethics > Business longevity	Annual General meetings Financial reports Press releases Roadshows, fairs and investor days	> Annually > Occasionally	
	> Financial performance	Information on the website and on social media (LinkedIn and Instagram) Contact with the IR & Communication team	> Frequently	
Public authorities and politics	 Compliance with legislation Good relationship and open dialogue with various bodies 	> Transparent and regular contact, mainly during (re)development projects	> Frequently	
Associations, partnerships and multi-stakeholder forums	 Awareness of challenges Information sharing, collaboration 	 Engagement with projects Meetings, workshops and seminars 	> Occasionally	
Tenants and occupants	Comfort, well-being, security Innovative solutions Adaptable spaces and flexibility Good contact with the Property Manager Interesting service offer, including alternative mobility solutions	Helpsite, contact service Punctual satisfaction surveys Newsletters Regular contact with the Commercial and Property Management teams Daily contact with the hospitality team of Silversquare	> Frequently	
Suppliers and subcontractors	Fair working practices Security and well-being Good relationship with the main contact Compliance Collaboration opportunities	Charter of responsible procurement Encounters Regular communication	> Frequently	
Local communities and residents	Transparent communication relative to (re)development projects Events and information sessions Improvement of community life Inclusive projects, open to city communities	> Accurate and timely communication on (future) projects in the neighbourhood	> Occasionally	
Players involved in construction: architects, design offices, contractors, trades	Clear and frequent communication relative to building sites Security on-site	Construction site meetings Regular communication Specification Construction site visits	> Frequently	
Followers of social media	 Information sharing Regular spot information 	> Posts and stories on LinkedIn and Instagram	> Frequently	
Team members	S Good and fair working conditions Professional development Global and personal performance Training Comfort, well-being, security at work Motivating compensation	Permanent communication (through the Intranet, screens, Teams channels and Yammer) Team events and afterworks Transverse working groups (Comité B+, LynX programme) Annual assessments and satisfaction surveys, Vox Collector Employee Assistance Programme Permanent training opportunities (language and IT courses, mindfulness, time management)	> Daily	

External stakeholders

FINANCIAL COMMUNITY

The IR & Communication department is responsible for communicating transparently about the Company's activities and their follow-up. The information is published in the form of reports and press releases. The department organises events such as roadshows and investors days for investors, conference calls and presentations for analysts, and general meetings for shareholders. Befimmo also participates in financial fairs. Within this framework, the media are therefore also considered important stakeholders because of their role in relaying information to the population and to our key stakeholders.

Befimmo engages with banks for all its financings, and since 2021 for its sustainable financings following its Green Financing Framework.

PUBLIC AUTHORITIES AND POLITICS

- > **European Union**: Befimmo is permanently monitoring developments in new EU legislation.
- Brussels: Leefmilieu Brussel | Bruxelles Environnement: Befimmo endeavours to maintain good relations and synergies with Bruxelles Environnement. This ensures follow-up of regional legislation and facilitates interactions during the design phase of (re)development projects.
- > Flanders: all permit requests are made via the "Omgevingsloket" digital platform.
- > Wallonia: contacts are made directly with the administrations.

ASSOCIATIONS, PARTNERSHIPS AND MULTI-STAKEHOLDER FORUMS

Befimmo is member of various associations, with the main aim of sharing information. These associations have no political purpose whatsoever and are not considered as a lobbying activity. In order to maintain a broad dialogue with multiple parties, Befimmo needs to foster connections with companies, associations, and multi-stakeholder forums.

UPSI

Befimmo remains committed to its relationship with the **Professional Union of the Real-Estate Sector** (UPSI). UPSI and Befimmo actively cooperated again in 2022 via working groups to incorporate federal and regional real-estate requirements. The CEO is a member of the UPSI board of directors. The Head of Environment is chairman of the Technical and Sustainability Commission.

The Shift

Befimmo is an active member of the Belgian network **The Shift** which brings together more than 560 organisations committed to sustainable development. Befimmo joined the **Belgian Alliance for Climate Action** (BACA) through The Shift. This alliance is a community of Belgian organisations that take their climate ambitions seriously and choose the path of Science Based Targets.

CBF

The Cercle Belge Des Femmes de L'immobilier brings together women executives to create a space for exchange and good practice. The Chief Development Officer is co-founder of the CBFI.

TENANTS AND OCCUPANTS

Regular and transparent communication with tenants is key to keeping a good relationship. Tenants must know how to get in contact with Befimmo in order to ask questions or report issues. On the other hand, Befimmo communicates proactively towards its occupants regarding works or spot initiatives in the different buildings.

Targeted communication

The Commercial department is the one in charge of explaining all benefits of a building to the potential tenant. This is done through regular contact and building visits. Whenever the tenant signs the contract, the Property Manager of the building shows them around, explaining all practical and technical aspects of the building such as security topics, but also information on infrastructure and services. All necessary information is sent to the tenant as well.

Befimmo's Communication and Hospitality teams supports the Property Managers for spot events to provide clear and cohesive communication using channels such as newsletters, screens in entrance halls, surveys, events, and information sessions.

Helpsite

This powerful system helps the Property Manager plan, implement and monitor incidents and requests for intervention. It is an online collaborative application offering secure external access for tenants (and suppliers). The Helpsite enables the Property Management to optimise incident management and to offer tenants effective follow-up of their submitted requests. The Property Managers send the Helpsite user guide to each new tenant and provides the necessary explanation regarding this essential tool.

SUPPLIERS AND SUBCONTRACTORS

In an effort to integrate the sustainability approach even more in its supply chain, Befimmo developed a Supplier Code of Conduct to communicate its expectations clearly during supplier engagement.

LOCAL COMMUNITIES AND RESIDENTS

Befimmo aims to ensure that every building in its portfolio integrates harmoniously into the neighbourhood where it is located, in terms of its architecture, the pooled services it offers, and the activities taking place inside.

Befimmo wants to meet the expectations of the external community by designing buildings that are open to the city, giving the opportunity to residents to enjoy the services offered within the building.

PLAYERS INVOLVED IN CONSTRUCTION: ARCHITECTS, DESIGN OFFICES, CONTRACTORS, TRADES

- > The Project department coordinates the various players in the planning and design stages for its (re)development projects;
- > The **Property department** coordinates the players involved in improvement works in the buildings;
- The Building Information Management (BIM) guides the implementation of construction processes, facilitates the communication, exchange, and management of data, and involves all players of the (re)development project;
- > Befimmo has been following up and applying BRE Environmental Assessment Method (BREEAM) certification since 2010 for all its portfolio, both operational buildings and (re)development projects;
- The Up4North association brings together about ten real-estate partners of the North area, and has continued its work notably under Befimmo's leadership. The main objective of this non-profit association is to transform the monofunctional district of Brussels North into a lively and inclusive district of Brussels.

FOLLOWERS ON SOCIAL MEDIA

With billions of people connected to social media, the online presence of Befimmo is key to attract new audiences and connect with followers. In recent years, Befimmo increased its visibility on LinkedIn and Instagram, counting respectively 9,304 and 691 followers at the end of 2022.

Internal stakeholders

The best way to ensure good relations with our internal stakeholders is by creating links and maintaining a regular dialogue. Befimmo's objective is to continually improve dialogue with its team, enhancing communication tools by adapting them to each person or situation while emphasising human contact.

THE TEAM

In addition to the day-to-day support work of the HR department, Befimmo has set up a number of internal communication and collaboration channels:

- > The Intranet and the Teams Flash Info are the main communication channels for formal and informal information
- > To improve communication between departments and to facilitate transverse projects, collaborative IT tools were introduced (Teams, SharePoint, and other programs under consideration and/or in development).

BOARD OF DIRECTORS AND COMMITTEES

The **Board** take part in defining and approving budgets and taking major decisions on sustainability, especially at strategy meetings and at the quarterly meetings when the results are published.

The **Executive Committee** ensures the effective leadership and management of the operational activities of the Company. Every month, sustainability topics are discussed during Executive Committee meetings.

Finally, the **ESG Cell** is responsible for developing and monitoring the 2030 Action Plan, releasing adequate resources, and takes an active part in the annual Management Review of the ISO 14001 Environmental Management System.

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