

PHILANTHROPY AND ASSOCIATIVE PARTNERSHIP POLICY¹

July 17, 2023

I. INTRODUCTION

As a humane, responsible and civic company, this policy was established following the founding values of Befimmo²: professionalism, commitment, setting an example, team spirit and humanity.

Given the numerous donation requests that Befimmo receives, it has drawn up the present policy with a view to provide a description of its commitment and to specify the terms thereof.

In general, donations can only be made by Befimmo if :

- a) They are carried out for legitimate commercial purposes; and
- b) They are not carried out with the aim to unduly induce a third party to abuse its position; and
- c) They never are the counterpart of an action in connection with a commercial or other decision; and
- d) They are not carried out with such a frequency as to raise questions about irregularity.

II. CHOICES OF ACTIVITIES AND PARTNERSHIPS

Keen to integrate ESG Policy in the heart of its activity, Befimmo chooses to express this through the activity of its Staff Members³. Befimmo invites the Staff Members to play an individual or collective role towards society, by offering them specific measures to participate in the commitment of Befimmo through projects it supports.

Within this framework, Befimmo chooses to give a greater support to some social activities by providing time and Staff Members instead of direct financial donations. Befimmo thus encourages its Staff Members to devote time to participate in actions it supports. As the case may be, Befimmo finances the participation of its Staff Members in these activities.

¹ This document was drawn-up in French. In case of inconsistency between the French version and its translations, the French version will prevail.

² "Befimmo" refers to Befimmo SA and its subsidiaries and Befimmo Real Estate Group SRL and its subsidiaries within the meaning of article 1:15 of the Belgian Code of Companies and Associations.

³ The notion of "Staff Member" within the meaning of this procedure encompasses all employees (present, former or future, full-time, part-time or temporary, volunteers, interns), shareholders, members of the Executive Committee, members of the Board of Directors, as well as independent service providers and any person working under the supervision of contractors, subcontractors and suppliers supplying services to Befimmo. All Staff Members are responsible for ensuring this Policy and the procedures set forth herein.

Corporate philanthropy gives every Staff Member the power to impact their community in a meaningful way.

The company encourages its employees to devote time and resources to charitable and non-profit organizations. However, except in case of a prior written approval, employees are prohibited from using the company's name, resources or professional contacts to solicit donations. Charitable donations made by a Staff Member in its own name should not have any connection with the company's activities.

However, the company discourages its Staff Members from seeking donations in connection with business relationships. In addition to the above, care should be taken to ensure that the seeking of a solicited donation in connection with a business relationship :

- a) Does not give rise to an appearance of irregularity;
- b) Does not give rise to a real, potential or perceived conflict of interest;
- c) Does not raise questions about compliance with applicable legislative or regulatory requirements;
- d) Cannot be perceived as a prerequisite to obtain a contract in the future;
- e) Cannot be perceived as a means of obtaining or retaining a contract or commercial advantage.

III. TYPES OF SUPPORT

Befimmo partners with social causes mainly through in-kind donations.

Befimmo supports these causes through three main ways:

- Volunteering: Staff Members donate their time for the common good and benefit of the community.
- Corporate donations campaigns: Staff Members work together and contribute their time, donations and services to the community.
- Global engagement campaigns: Staff Members work together with some of Befimmo's tenants and contribute their time, donations and services to a cause. These campaigns expand the reach of efforts, and strengthen the bond between Befimmo and its occupants.

Befimmo usually chooses to focus on smaller, locally effective charities, who directly impact the health and well-being of the local community.

IV. TYPES OF DONATION

There are two main types of donations that Befimmo can make to charities and social causes. These are:

- In-kind donations: charitable giving of goods and services.
Examples include:
 - providing clothing, food, office supplies and IT material
 - organising blood donations

- passing on knowledge and support to encourage social and professional integration of vulnerable groups
- Financial donations: monetary donations from our global corporate philanthropy budget, only when an effort by Staff Members has been made to earn the money.

Examples include:

 - participating in sport events like the 20 km through Brussels
 - organising a collective sport effort using an application to raise money

V. EXCLUSIONS

Befimmo receives donation requests on a regular basis and applies strict rules before donations can be considered (register of requests, verification of the conditions, the persons and entities involved, prior written approvals etc.) Within this framework, some of the requests are automatically excluded:

- Requests which are not in line with our philanthropy and associative partnership policy (see explanation above), particularly those that are not linked to the active participation of our Staff Members;
- Requests from organisations which are contrary to the Code of Ethics and policies adopted by Befimmo;
- Requests from political or religious organisations;
- Requests from organisations that discriminate based on age, sexual orientation, civil status, birth, wealth, religious or philosophical belief, political belief, trade union belief, language, current or future health condition, disability, physical or genetic characteristic, social origin, or any other legally protected classification.

VI. REQUESTS

If you think of a philanthropic or associative partnership with Befimmo, please send an email to sustainabiliy@befimmo.be. All requests will be treated with the strictest confidentiality and an answer will be provided as soon as possible.

All requests and questions relating to this present policy will be dealt with the Sustainability and Innovation department. In case of a direct arrangement between Befimmo and a charity or philanthropic organization, a third party due diligence on that organization will be done.