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## 1 Introduction

Intervest Offices & Warehouses (referred to hereafter as “Intervest”) is a listed real estate company active in the market of logistics buildings and offices.

Intervest wants to play a pioneering role in the field of sustainability and therefore places sustainability as an essential part of its strategy, being sustainable value creation, with an eye for continuous quality improvement of the buildings for customers in two segments: logistics and offices. By listening to the wishes of customers, thinking along and thinking ahead, Intervest can 'unburden' its customers and offer added value. A motivated team provides comprehensive services and flexible solutions, so that customers can focus on their core activities.

For Intervest, sustainability means the long-term well-being of its own team, the customers and their employees. The ultimate goal is to create value for all its stakeholders in a sustainable and future-proof way.

Environmental, Social and Governance (ESG) topics are fully incorporated in our investment and management approach.

- Environmental topics refer to the company’s response to environmental issues such as climate change, resource depletions, waste, and pollution.
- Social topics are related to the company’s care for people, workers, and local communities, including health and safety issues.
- Governance topics refer to how we run our business, from corporate policies and decision-making processes, to compliance and our stance on issues such as corruption, diversity, and remuneration.

## 2 Ambitions

Our ESG strategy is built around three focus areas addressing the most relevant environmental, social and governance trends to create value for our stakeholders:

1. Future-proof buildings/Energy-efficiency
2. Health & Well-being
3. Business integrity and compliance

Improving our ESG performance is an integral part of our long-term value creation strategy and embedded in our DNA.

Our goal is creating healthy and inspiring environments and making our places inclusive anchors with a focus on health and well-being of tenants and employees.

## 3 Strategic

A sustainability team has been established at a strategic level. This team brings together the expertise from the various business activities – property management and project (re)development and is supported by the Management board. The sustainability team is responsible for the development and follow-up of the ESG strategy and reports directly to the CEO. In his position, the CEO is responsible both

for the strategic aspect (developing an ESG strategy and action plan, engaging with stakeholders on sustainability), and for the operational aspect (coordination and follow-up of the ESG action plan, motivation and support of colleagues in implementing the various initiatives). The ceo is also responsible for the social aspect of sustainability. The cio is responsible for the ESG aspect in the new investments. The technical director takes care of the implementation of the ESG actions within the new developments and redevelopments. The asset managers are responsible for the ESG strategy for the already existing buildings in portfolio. Both are responsible within their area for spreading the sustainability vision to colleagues. They also act as antennas to link back from their projects about the actions taken and to provide input on improving the ESG policy. The cfo is responsible for the ESG risk monitoring and the green financing framework.

At the operational level, Interinvest strives to get everyone within the company involved in the sustainability vision. In recent years, many sustainability actions have already been carried out. By developing the ESG policy, Interinvest wants to bring more structure and systematics into the processes.

## 4 Principles, guidelines and materiality

Interinvest is continuously reviewing the degree to which its investment and management processes are aligned with the following international normative standards:

1. The 17 United Nations sustainable development goals (SDGs)<sup>1</sup>
2. The 10 United Nations Global Compact Principles<sup>2</sup>
3. The European Public Real Estate sustainable Best Practices Recommendations (EPRA sBPR)<sup>3</sup>
4. The EU Taxonomy Regulation<sup>4</sup>

The 17 **SDGs** adopted by United Nations Member States in 2015 establish an important path for building a better world by 2030. The SDGs also provide a framework for how companies can contribute to a positive future of the world.

Interinvest endorses these 17 SDGs. In concrete terms, Interinvest believes it has the greatest possible impact by actively including several SDGs in its sustainability policy which are presented in the overview below.

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<sup>1</sup> <https://sdgs.un.org/goals>

<sup>2</sup> <https://www.unglobalcompact.org/>

<sup>3</sup> <https://www.epra.com/sustainability/sustainability-reporting/guidelines>

<sup>4</sup> [https://ec.europa.eu/info/business-economy-euro/banking-and-finance/sustainable-finance/eu-taxonomy-sustainable-activities\\_en](https://ec.europa.eu/info/business-economy-euro/banking-and-finance/sustainable-finance/eu-taxonomy-sustainable-activities_en)

In addition to the focus on these SDGs, Intervest has a program to include all 17 SDGs in its operations in cooperation with Voka Charter Sustainable Entrepreneurship. By the end of 2020, all 17 sustainable development goals have been realized at least once in the daily operational management, as a result of which Intervest has received the internationally recognized UNITAR certificate, linked to the United Nations.

In support of the endorsement of the above 17 United Nations SDGs, Intervest also commits to adhere to the ten **principles of the United Nations Global Compact**. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of human rights, labour, the environment and anti-corruption.

In addition, the **EPRA performance measures** (EPRA sustainability Best Practices Recommendations, (EPRA sBPR)) specifically applicable to the real estate sector have been used by Intervest since 2019. EPRA (European Public Real Estate), is a non-profit organisation that represents listed real estate companies in Europe. EPRA brings about transparent and standardised reporting at general financial level and more specifically with regard to sustainability.














In order to meet the EU's climate and energy targets for 2030 and reach the objectives of the European green deal, it is vital that we direct investments towards sustainable projects and activities. A common classification system for sustainable economic activities, or an "**EU taxonomy**" was created. The EU Taxonomy Regulation was published by the European Union in June 2020 and entered into force in July 2020. The Taxonomy Regulation establishes six environmental objectives:

- (1) Climate change mitigation
- (2) Climate change adaptation
- (3) The sustainable use and protection of water and marine resources
- (4) The transition to a circular economy
- (5) Pollution prevention and control
- (6) The protection and restoration of biodiversity and ecosystems.

Intervest will make disclosures in line with the EU taxonomy eligibility.

While all ESG topics are important, Intervest believes that certain topics may be more material than others when making investment and/or management decisions relating to our assets or to our own operations. For that reason, we have completed regular **materiality** assessments on a broad range of sustainability topics based on input from a range of stakeholders, including shareholders, investor clients, tenants, suppliers, contractors and, of course, employees. The outcome of this materiality assessment may from time to time encourage us to update the topics included in this ESG charter coupled with relevant performance indicators to stay in tune with the expectations of our key stakeholders.

The overview below shows the important topics for real estate investment and for Intervest regarding the ESG, the EU taxonomy, the SDGs and the UN Global Compact Principles. The topics, under each of the three headings of Environmental, Social and Governance topics, that Intervest consider to be most material for our own activities have a number of performance indicators attached that help to frame our targets setting and on-going monitoring as well as reporting on an annual basis.

ESG	SDG	Principles of UN Global Compact
<b>ENVIRONMENTAL</b>		
<ul style="list-style-type: none"> <li>• <u>Climate change mitigation:</u> <ul style="list-style-type: none"> <li>○ <u>Green Building Certificates</u></li> <li>○ <u>Energy consumption</u></li> <li>○ <u>Greenhouse Gas Emissions</u></li> <li>○ <u>Renewable Energy</u></li> <li>○ <u>Responsible Rent and Lease management</u></li> <li>○ <u>Water consumption</u></li> </ul> </li> <li>• <u>Environmental education and awareness</u></li> <li>• <u>Biodiversity and Habitat</u></li> <li>• <u>Climate change adaptation</u></li> </ul>	    	<p><b>Environmental</b></p> <p><a href="#">Principle 7:</a> Businesses should support a precautionary approach to environmental challenges</p> <p><a href="#">Principle 8:</a> undertake initiatives to promote greater environmental responsibility</p> <p><a href="#">Principle 9:</a> encourage the development and diffusion of environmentally friendly technologies</p>
<b>SOCIAL</b>		
<ul style="list-style-type: none"> <li>• <u>Health, Well-being and Safety</u> <ul style="list-style-type: none"> <li>○ <u>Employee: Health, Well-being, Vitality and Personal Development</u></li> <li>○ <u>Contractors: Health and Safety</u></li> <li>○ <u>Tenants/occupiers: Health and Well-being</u></li> </ul> </li> <li>• <u>Human Rights</u></li> <li>• <u>Indoor environmental quality</u></li> <li>• <u>Inclusion / diversity policy</u></li> </ul>	     	<p><b>Human rights</b></p> <p><a href="#">Principle 1:</a> Businesses should support and respect the protection of internationally proclaimed human rights</p> <p><a href="#">Principle 2:</a> make sure that they are not complicit in human rights abuses</p> <p><b>Labour</b></p> <p><a href="#">Principle 3:</a> Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining</p> <p><a href="#">Principle 4:</a> the elimination of all forms of forced and compulsory labour</p> <p><a href="#">Principle 5:</a> the effective abolition of child labour</p> <p><a href="#">Principle 6:</a> the elimination of discrimination in respect of employment and occupation</p>
<b>GOVERNANCE</b>		
<ul style="list-style-type: none"> <li>• <u>Business integrity</u></li> <li>• <u>Compliance with EU and national ESG laws and legislation</u></li> <li>• <u>Cybersecurity</u></li> <li>• <u>Data protection, Cybersecurity and Privacy</u></li> </ul>	 	<p><b>Anti-Corruption</b></p> <p><a href="#">Principle 10:</a> Businesses should work against corruption in all its forms, including extortion and bribery</p>

## 5 Environmental

Environmental refers to Intervest’s response to environmental issues such as climate change, resource depletions, waste, and pollution.

### 5.1 Climate change mitigation

Real estate is responsible for 36% of the total CO<sub>2</sub> emissions in the European Union<sup>5</sup>. A real estate player can and should make a significant contribution to mitigating climate change and its impact. Energy efficiency is a logical point of attention in the professional management of real estate, both in the purchase of new and old buildings, in the development of new projects and in the management of the existing portfolio.

A building’s life cycle energy (LCE) comprises its embodied energy (EE) and operational energy (OE). The building design, prevalent climatic conditions and occupant behaviour primarily determines its LCE. Thus, for the identification of appropriate emission–reduction strategies, studies into building LCE are crucial. While OE reflects the energy utilized in operating, EE comprises the initial capital energy involved in its construction (material and burden associated with material consumption in buildings). Assessment of EE and OE in buildings is crucial towards identifying appropriate design and operational strategies for reduction of the building’s life cycle energy.

Therefore, Intervest includes the LCE in its development programs as well as in its redevelopment schemes of the existing portfolio and the development of new projects. For the entire portfolio, a sustainability building assessment per asset is analysed on a recurring basis.

Considering Intervest commitment to being a positive force in the fight against climate change, our primary focus is on the energy efficiency of our assets, which is a key requirement in the roadmap towards a Net Zero Carbon portfolio. Therefore, we have established a comprehensive package of actions that will lead us to successfully accomplish our ambitions.

We focus on energy transition and the enhancement of the biodiversity on our unique locations.

#### 5.1.1 Green Building Certificates

We believe that real estate can have the potential to contribute to, or in some cases even be a driver of, sustainable development. The assets directly affect many stakeholders: tenants, users, neighbours and local communities in particular. Real estate can also be of historical and architectural value. The responsibility for preserving these buildings and our cultural heritage lies with today’s generation. Conservation, restoration, renovation, and redevelopment are no longer the sole duty of national and local governments, but the responsibility of everyone, including all who own and manage properties.

The impact and sustainable performance of real estate have been translated into manageable indicators, that have been incorporated into international green building certification systems like BREEAM, LEED, WELL, HQE. Intervest considers that the “degree of sustainability” or “environmental risk” is

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<sup>5</sup> 2020 Global Status Report for Buildings and Construction - <https://globalabc.org/resources/publications>.  
[https://ec.europa.eu/info/news/focus-energy-efficiency-buildings-2020-feb-17\\_en](https://ec.europa.eu/info/news/focus-energy-efficiency-buildings-2020-feb-17_en)

adequately reflected by these rating systems, and they therefore serve as a good proxy for the sustainability performance of individual assets and of whole portfolios. The higher the rating, the more future-proof and sustainable the asset.

We aim to obtain a certification that is in the top two nudges.

To demonstrate compliance with internal policies, laws, regulations and voluntary standards like BREEAM or other international green building certifications, all relevant documents and permits are to be kept up to date.

BREEAM is an internationally recognised sustainability label for buildings. The BREEAM methodology makes it possible to measure and assess the sustainability of buildings. The assessment is carried out across the full spectrum of sustainability: from energy through waste management to user health. Interinvest considers a building with a score of “Excellent” or better to be a sustainable building.

However, in this context it is important that Interinvest always puts the tenant and value creation centre stage, so that BREEAM or other international green building certifications assessments are not seen as a tick-the-box exercise, but that solutions are only implemented if they actually create added value.

#### *5.1.2 Energy Consumption*

Considering Interinvest commitment to being a positive force in the fight against climate change, our primary focus is on the energy efficiency of our assets available for lease, which is a key requirement in the roadmap towards a Net Zero Carbon portfolio.

At key moments in the lifecycle of individual assets, we engage with all the partners, especially tenants, to agree a collaborative strategy for increasing the energy efficiency of our buildings and driving down the total energy consumed. This is a crucial requirement in meeting the targets agreed by the signatories of the Paris Agreement and Interinvest believes that this will have a positive long term financial impact as regulation against energy inefficient buildings will make underperforming buildings unattractive for tenants and investors, thereby putting their value at risk.

To measure is to know. More sustainable energy consumption starts with a clear view of current consumption. It is the intention to gain insight into energy consumption in all of its properties and not only in those properties for which Interinvest is responsible for the energy purchase.

None of Interinvest’s buildings uses city networks for either heating or cooling.

The fuel consumption concerns exclusively natural gas.

#### *5.1.3 Greenhouse Gas Emissions*

The aim of the aforementioned topic of energy efficiency in combination with on-site renewable energy generation is of course to drive down the overall carbon emissions of our assets. Ultimately is about delivering an operational Net Zero Carbon portfolio. To work towards this target, we must transparently report on the CO<sub>2</sub> (and any other greenhouse gas – GHG) emissions emitted through the use and occupation of our assets available for lease. This will allow us to track progress against our long-term goal and allow for course-correction and deliberate portfolio choices as we progress against this net zero carbon target.

#### *5.1.4 Renewable Energy*

Intervest is committed to generate or purchase electricity generated exclusively from sustainable sources.

#### *5.1.5 Material Sourcing*

For this topic, we rely on our supplier code of conduct and make choices to include actions on these credits at the key moments in the asset's lifecycle (major maintenance or redevelopment moments). Specific topics might include design for deconstruction (to facilitate greater recycling of building materials in the future), non-hazardous and low-carbon materials, local sourcing etc. Intervest aims for circular decomposition in the development process.

#### *5.1.6 Pollution Prevention*

For this topic, we make choices to include actions on these credits at the key moments in the asset's lifecycle (major maintenance or redevelopment moments or at a new lease or tenant fit-out moments).

#### *5.1.7 Responsible Rent and Lease Management*

We recognise that tenant engagement is a pre-requisite to improving the sustainability rating of our portfolios in the long term. Therefore, we actively exploit the potential of green leases by agreeing on data sharing for relevant performance indicators and encourage upgrading building performance at refurbishment moments. We seek to include legally binding clauses to improve sustainability ratings when signing new lease contracts and whenever feasible, purchase agreements for on-site generated renewable energy are also incorporated in the collaboration with our tenants. As part of a responsible engagement process, Intervest communicates the sustainability credentials of individual buildings and projects to its tenants (and other stakeholders).

Further, in line with investor client wishes, Intervest takes responsible tenant selection into account when confronted by vacancy in any of its assets and will deliberately avoid tenants active in 'sin industries'.

#### *5.1.8 Waste Management*

For this topic, we rely on the BREEAM In-Use credits relating to Resources (RSC) or other international green building certifications credits and make choices to include actions on these credits at the key moments in the asset's lifecycle (major maintenance or redevelopment moments or at a new lease or tenant fit-out moments). We collaborate closely with our tenants and property managers to facilitate and stimulate overall reduction of waste production as well as recycling of waste as much as possible.

#### *5.1.9 Water Consumption*

For this topic, we rely on the BREEAM credits or other international green building certifications credits relating to water and make choices to include actions on these credits at the key moments in the asset's lifecycle (major maintenance or redevelopment moments or at a new lease or tenant fit-out moments).

#### *5.1.10 Sustainability as an integral part of (d)investment decisions*

Intervest integrates sustainability aspects during the investments and divestment decisions. The disposal and acquisition due diligence processes contain provisions for sustainability aspects.



### 5.1.11 Location and accessibility

Intervest invests in high-quality office buildings and logistics properties that are leased to first-rate tenants. The properties in which Interinvest invests consist primarily of up-to-date buildings that are strategically located, often in clusters. The office segment of the real estate portfolio focuses on the central cities with an important student population of Antwerp, Mechelen, Brussels and Leuven and their surroundings; the logistics segment of the portfolio in Belgium is located on the Antwerp - Brussels - Nivelles, Antwerp - Limburg - Liège, and Antwerp - Ghent - Bruges axes and, in the Netherlands, on the Moerdijk - 's Hertogenbosch - Nijmegen, Rotterdam - Gorinchem - Nijmegen and Bergen-op-Zoom - Eindhoven - Venlo axes. Interinvest distinguishes itself in renting space by going beyond merely renting m<sup>2</sup>. The company goes beyond real estate by offering “turnkey solutions” (a total solution tailored to and with the customer), extensive service provision, co-working and ready-to-use offices.

We measure this by allocation impact on the total portfolio is part of analysis in acquisition due diligence process.

## 5.2 Environmental education and awareness

At Interinvest we focus on creating transparency and awareness around ESG performance towards relevant stakeholders. Through ongoing improvement of knowledge sharing and education we continuously improve our target setting and measures.

This is a continuous learning process through courses/engagement sessions. Our ESG metrics are embedded in our annual performance targets of the management and supervisory board.

Interinvest wants to pursue the highest standards of sustainability on both the portfolio and financing fronts. After all, Interinvest employs a very broad vision regarding sustainability and is committed to building a long-term relationship with all of its stakeholders. As a team creating sustainable value for all stakeholders, the strategy can be summarised in one line.

The stakeholders are central to everything Interinvest does. It is therefore essential to have an understanding of their expectations in order to be able to respond as well as possible to their main interests. Identifying the expectations of the stakeholders and the importance they attach to each of them is a process of continuous and intense dialogue that takes place within Interinvest’s day-to-day operations.

Thus, from multiple angles and in different ways, a continuous dialogue is provided with tenants, financiers and investors, the employees, the suppliers, the government and the community.

## 5.3 Biodiversity and Habitat

The built environment of course has an impact on local biodiversity and habitat. For this topic, we rely on the BREEAM credits or other international green building certifications credits relating to land use and ecology and make choices to include actions on these credits at the key moments in the asset’s lifecycle (major maintenance or redevelopment moments). Specific actions might include incorporating a green roof or adding features to support local fauna.

## 5.4 Climate change adaptation

As the climate heats up, it will bring with it all kinds of risks. From more frequent extreme weather events like heatwaves, droughts or floods, to coastal erosion from rising sea levels, the impacts will affect everyone.

Interinvest integrates the impacts of climate changes in its investment process. For the entire portfolio, a climate change adaptation plan per asset is prepared and analysed on a recurring basis.

## 6 Social

Social topics are related to the company's care for people, workers, and local communities.

### 6.1 Health, Well-being and Safety

#### *6.1.1 Employee: Health, Well-being, Vitality and Personal Development*

At Interinvest we believe our colleagues are best placed to contribute to the success of our company if they feel happy, healthy, and engaged. Many factors play a role in creating an optimal balance. As an employer we want to actively create a positive and productive place to work and provide our colleagues with the means to promote a healthy mental, physical, and emotional lifestyle.

Health and well-being, and how to achieve that, means different things to different people. With a diverse workforce, there are many views on how to best support our colleagues and the extent to which employer involvement is appreciated or considered appropriate.

There are four categories where Interinvest believes we can help our colleagues improve their health & well-being:

- (1) in the physical space of the office
- (2) by stimulating and facilitating habits pertaining to physical health
- (3) by helping our colleagues find the right work-life balance for them
- (4) by equipping our people with the skills and competences they need to be at their best.

Interinvest is convinced of the win-win situation that can be created through the self-development of its employees and as an organization it is building a broader base of knowledge. At the same time, personal development plays a very important role in the motivation of employees. For this reason, Interinvest is very consciously committed to internal and external initiatives that promote the development of its employees.

#### *6.1.2 Contractors: Health and Safety*

Interinvest recognizes its duty of care to all people who work on our behalf at or on our assets. A healthy and safe environment is essential for the well-being and vitality of our contractors and their staff.

Our code of conduct describes how we – or contractors that work on our behalf – actively seek to reduce health and safety risks, eliminate hazards and limit the number of work-related injuries or on-site accidents to an absolute minimum.

Intervest expects our suppliers/contractors to meet the highest health and safety standards when working on projects on our behalf so that people working on them are not at risk. The buildings themselves should meet high health and safety standards as well and comply with all national or local legislation, to ensure the well-being of their users. We expect the health and safety records to be monitored and all relevant documentation and safety and maintenance certificates to be kept up to date.

#### *6.1.3 Tenants/Occupiers: Health, Safety and Well-being*

Building design and day-to-day operational management can have a significant impact on the health and well-being of the building's occupants. Lighting, heating, cooling, ventilation, materials use and other aspects can have both social as well as environmental impacts. As the attention for social impact of the built environment increases, Intervest understands the importance of thinking through design, materials and installations choices, on building occupiers and possible impacts on their comfort and well-being.

## 6.2 Human Rights

We expect all our stakeholders to abide by the UN Global Compact principles with regards to human rights.

## 6.3 Indoor Environmental Quality

For this topic, we make choices to include actions on these credits at the key moments in the asset's lifecycle (major maintenance or redevelopment moments). Specific topics might include deliberate choices on lighting, indoor comfort etc.

We include this approach in our new investments and developments.

## 6.4 Inclusion / diversity policy

Inclusion and diversity in all its aspects (culture, gender, language, professional experience, etc.), equal opportunities and respect for human capital and human rights are inherent to Intervest's corporate culture. The company is convinced that these values contribute to balanced interactions, enriched vision and reflection, to innovation and an optimal work environment.

When composing the supervisory board and the management board, the aim is to achieve complementarity with regard to skills, knowledge, experience and diversity in terms of education, knowledge, gender, age, experience, nationality, etc.

This translates into a balanced composition of the supervisory board with regard to skills, knowledge and experience. The members of the management board also form a balanced team, each having the required professional integrity and appropriate expertise. This is clearly shown in the curriculum vitae of each of the members, which is presented in the corporate governance statement.

Furthermore, the Intervest code of conduct underlines the importance of these values to all employees and can be viewed at [www.intervest.eu](http://www.intervest.eu). Intervest's culture is rooted in giving Autonomy, fostering Involvement, Competences, setting Goals and a sound work-life Balance.

## 7 Governance

Corporate governance is an instrument for dealing in a balanced way with the diversity of interests of different stakeholders. In that sense, it should primarily focus on mitigating and properly handling conflicts of interest inherent in working in a corporate structure. Clear conflict of interest arrangements and transparent communication with stakeholders are therefore essential to ensure that the company's resources are used in the best interests of its stakeholders. In this way, good governance creates added value and sustainable growth.

Intervest has developed a corporate governance structure that supports its activities optimally, that meets the needs of its stakeholders and ensures that it complies with the relevant laws and regulations. Intervest uses the Belgian Corporate Governance Code 2020 as reference code. Intervest's supervisory board has set out the corporate governance principles in a number of directives, namely

- › the Corporate Governance Charter
- › the remuneration policy
- › the internal regulations of the management board
- › the (supplier) code of conduct
- › the procedure for reporting irregularities
- › the dealing code: the trading regulations for the prevention of abuse of insider knowledge and prevention of market abuse.

These documents are reviewed regularly so that they are always in line with the applicable legislation and corporate governance rules. These guidelines can be viewed on the company's website ([www.intervest.eu/en/risk-management-and-charters](http://www.intervest.eu/en/risk-management-and-charters)).

Within the context of transparent communication with its stakeholders, Intervest publishes its corporate governance statement each year, which is an integral part of the annual financial report which can be consulted on the company's website ([www.intervest.eu/en/annual-reports](http://www.intervest.eu/en/annual-reports)).

### 7.1 Business integrity

We strive for sustainable, long-term value creation and subsequently expect high standards of business integrity from our employees and business partners. A well-embedded (supplier) code of conduct ensures that possible conflicts are identified, dilemmas can be openly discussed, and misconduct can be reported (via an explicit Procedure for Reporting Irregularities (PRI)). It also provides grounds to walk away from an attractive deal because of e.g., ethical issues. This reduces the level of risk of misconduct in our entire business operations and ensures that the way we do business is in line with best practice ethical standards.

Intervest avoids entering a contract or a business relationship with a company or an individual without full knowledge of e.g., the ultimate beneficial owner and the origin of capital, as this may expose our reputation and/or that of our shareholders and could be in conflict with our integrity principles and result in possible non-compliance to laws and regulations.

In line with our (supplier) code of conduct but also our investor clients' instructions, Interinvest also considers certain products and services to be inconsistent with the principles of Human Dignity and we therefore choose to avoid or exclude (whenever possible) tenants/occupiers active in 'sin industries'.

Bribery and corruption are prohibited in any form, be it intentionally or unintentionally – directly or indirectly – including an offer, promise, undue payment, or undue advantage to a public official. Similarly, facilitation payments are prohibited in any form (i.e., payments made or offered to speed up or facilitate a routine action or process) regardless of current practice in a particular jurisdiction.

## 7.2 Compliance with EU and national ESG laws & legislation

Achieving compliance with all EU and/or national laws & legislation pertaining to ESG topics, as they evolve and become ever more stringent, will mean that investor clients can have confidence that their invested capital can be classified as being environmentally sustainable. As far as practically and reasonably possible, Interinvest aims to offer sustainable products and services in the pursuit of our ambition to be a 'force for better' thereby contributing to a greener and cleaner economy.

Interinvest is committed to ensuring that any of its subsidiaries (but especially its regulated entities) adopt and comply with all EU and/or national legislation or directives on ESG topics.

We will adopt and comply with the EU taxonomy and the Corporate Sustainability Reporting Directive.

## 7.3 Digitalisation

Sustainability builds on digitalisation. One of the greatest challenges for ESG management is the volume, complexity and aggregation of ESG data, as well as ensuring data quality and security. Digital solutions can support the planning, controlling and management of data.

We aim to optimize the working relationship between our employees and our communication with our stakeholders and is therefore integrating new digital technologies to streamline our operational processes.

## 7.4 Data Protection, Cybersecurity and Privacy

With the advent of the GDPR legislation, Interinvest continues to actively encourage all employees and business partners to act in accordance with this legislation. We have a Interinvest privacy statement for employees, and a separate Interinvest privacy statement for customers, outlining what personal data we store and how this is processed, all in accordance with the GDPR regulations.

In our ever-increasing digital world, Interinvest takes cybersecurity as seriously as possible. In our governance structure, we report to our Supervisory Board on all IT, digital and cyber issues.

Respect for the privacy regulations is a constant point for attention for Interinvest. Employees are well aware of this. Staff can always contact the compliance officer with any questions, via the email address [gdpr@interinvest.be](mailto:gdpr@interinvest.be) created for this purpose, or via a notification point on the company's intranet.