

# Sustainalytics Second Party Opinion

## Crelan Green Bond Framework

05 December 2025

Framework owner and location:  
Crelan Group  
Brussels, Belgium

Sector:  
Banks

### Overall Assessment

Sustainability Contribution



Principles Alignment

Aligned  
Green Bond Principles 2025

Contribution to SDGs



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### Assessment Summary

Crelan Group has developed the Crelan Green Bond Framework, dated December 2025, under which it intends to issue green bonds to fund projects in Belgium in two environmental categories.

We have assessed the overall Sustainability Contribution of the Framework as **Significant** based on the average Sustainability Contribution of the Framework's two use of proceeds categories, weighted according to the expected percentage allocation indicated by Crelan to Sustainalytics.

Under the Green Buildings category, the Bank will finance new and existing buildings that rank among the best energy performing buildings in Belgium, as well as building renovations that achieve at least a 30% energy efficiency improvement compared to pre-renovation levels. The Framework does not require newly constructed buildings to be zero-emission-ready, and renovations may use gas boilers, albeit with higher efficiency. Overall, these expenditures are collectively expected to significantly contribute to the buildings sector's decarbonization.

Under the Clean Transportation category, Crelan will finance fully electric road transport vehicles. Considering that road transport represents the largest source of emissions in Belgium's transport sector, these expenditures are expected to make a strong contribution to the sector's decarbonization and the transition to clean mobility.

We have assessed the Framework as **Aligned** with the Green Bond Principles 2025.

## Breakdown per Use of Proceeds Category

We have assessed the overall Sustainability Contribution of the Framework as **Significant** based on the average Sustainability Contribution of the Framework's two use of proceeds categories. We have weighted each category according to the expected percentage allocation indicated by Crelan to Sustainalytics, as shown below.

Category	Sustainability Contribution Level			Weight
Green Buildings	Neutral	Moderate	<b>Significant</b>	90%
Clean Transportation	Neutral	Moderate	Significant	10%

## Issuer Overview and Sustainability Strategy

Crelan Group is a co-operative bank headquartered in Brussels, Belgium, that operates under two brands: Crelan and Europabank. The Bank provides retail and commercial banking services to individuals, the self-employed, agricultural businesses, and small and medium-size enterprises (SMEs). As of December 2024, the Bank reported total assets of EUR 55.8 billion, employed more than 4,300 people and served about 1.7 million customers through 727 branches in Belgium.<sup>1</sup>

Crelan's ESG Policy outlines the Bank's sustainability strategy, which focuses on the following initiatives, among others: i) addressing climate change and reducing its own environmental footprint; ii) financing SME transition; iii) providing a safe, healthy and inclusive work environment; and iv) engaging with its co-operative members to increase the positive impact in local communities.<sup>2</sup>

To reduce its environmental footprint, the Bank has set 2030 net zero targets for its scope 1 and 2 greenhouse gas emissions. To achieve these targets, the Bank aims to improve its offices' energy efficiency, electrify its vehicle fleet and increase the use of renewable energy in its operations.

Crelan has also committed to reducing financed emissions in its loan portfolio and is developing targets for the GHG emissions associated with its residential mortgages, which represent about 80% of the Bank's loan portfolio and 35% of the Bank's financed GHG emissions. To support this objective, the Bank offers renovation loans for properties with low energy performance, integrates energy performance certificate (EPC) criteria into its credit policy, and raises customer awareness through its Setle platform, which enables clients to estimate the cost of energy renovations. To reduce financed emissions from the transport sector, Crelan promotes low carbon mobility by offering loans at preferential rates for customers purchasing electric vehicles.<sup>3</sup>

To support SMEs in their sustainability transition, Crelan provides financing for projects that promote the adoption of cleaner production processes, energy-efficient technologies and sustainable farming practices. As part of its social objectives, the Bank aims to: i) achieve at least 33% representation of the underrepresented gender on its board of directors and 40% among non-executive directors by 2030; ii) promote a safe and inclusive workplace culture; iii) incorporate social criteria into lending decisions to ensure fair access to banking products and support for first-time home buyers; and iv) strengthen local communities through the CrelanCo Foundation and financing SMEs that contribute to local economic development.

Crelan's sustainability governance framework supports the integration of ESG factors into its strategy and operations. The board of directors oversees the Bank's sustainability performance and the implementation of the ESG strategy and targets. The Executive Committee is responsible for overall operational management, including ESG aspects, while the ESG Steering Committee implements the ESG strategy and reports on its progress to the Executive Committee. Crelan has also integrated ESG-related factors into the mandates of other existing committees: the Audit Committee monitors sustainability reporting, and the Remuneration Committee incorporates ESG targets in the remuneration policy. In addition, the Bank has subcommittees focused on climate-related risks and ESG integration into lending activities. Crelan reports on its sustainability performance as part of its integrated annual report, which includes information on the Bank's sustainability strategy, impact, risks and opportunities, as well as ESG metrics and targets.<sup>4</sup>

<sup>1</sup> Crelan Group, "Annual report 2024", at: [https://www.crelan.be/sites/default/files/documents/Crelan\\_AnnualReport\\_2024.pdf](https://www.crelan.be/sites/default/files/documents/Crelan_AnnualReport_2024.pdf)

<sup>2</sup> Crelan Group, "ESG Policy", at: <https://www.crelan.be/sites/default/files/documents/Crelan%20ESG%20Policy.pdf>

<sup>3</sup> Crelan Group, "Annual report 2024", at: [https://www.crelan.be/sites/default/files/documents/Crelan\\_AnnualReport\\_2024.pdf](https://www.crelan.be/sites/default/files/documents/Crelan_AnnualReport_2024.pdf)

<sup>4</sup> Ibid.

## Principles Alignment

We have assessed the Crelan Green Bond Framework as follows:

### Green Bond Principles 2025 – **Aligned**

Crelan intends to issue green bonds, including public and private placements,<sup>5</sup> secured bond issuances, such as covered bonds, asset-backed securities (ABS) and residential mortgage-backed securities (RMBS), unsecured senior preferred bonds, senior non-preferred bonds, and subordinated Tier 2 bonds<sup>6</sup> under the Framework.

The Bank will only structure secured bond issuances, including covered bonds, ABS and RMBS, as secured green standard bonds, as defined by ICMA in the GBP. The Bank will apply the net proceeds from the secured green standard bonds exclusively to finance or refinance eligible projects. There will be no double counting of eligible projects underlying the secured green standard bonds with any other type of outstanding, green-labelled financing instruments.

Crelan will ensure the alignment of all issuances by its subsidiaries with the four core components of the Principles, as defined in the Framework.

### Principles Alignment Detailed Evaluation

#### Use of Proceeds

 **Aligned**

##### *Alignment with core requirements*

- The Framework describes eligibility criteria appropriately.
- All expenditures are expected to provide clear environmental benefits.

##### *Additional considerations*

- Crelan has committed to the following practices, which go beyond the core requirements:
  - The Bank has provided the estimated share of allocation per category.

#### Project Evaluation and Selection

 **Aligned**

##### *Alignment with core requirements*

- The Framework describes a governance process for the evaluation and selection of eligible projects.
- The Framework communicates the environmental objectives of eligible projects.
- The Framework describes a process to identify and manage perceived environmental and social risks associated with eligible projects.

##### *Additional considerations*

- Crelan has committed to the following practices, which go beyond the core requirements:
  - The Bank describes how eligible projects support its overarching sustainability objectives and strategy.

<sup>5</sup> Public and private placements will exclude the sale of stocks.

<sup>6</sup> Tier 2 issuances will be limited to debt issuances.

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- ▶ The Bank intends to align certain projects under the Framework with the EU Taxonomy's technical screening criteria for substantial contribution in the Climate Delegated Act (December 2021),<sup>7</sup> on a best-effort basis.<sup>8</sup>
- ▶ The Framework indicates the Sustainable Development Goals to which it expects to contribute through eligible projects.
- ▶ The Framework does not provide financing for controversial weapons, pornography, tobacco production, and oil and gas exploration, among other activities.<sup>9</sup>

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**Management of Proceeds** **Aligned***Alignment with core requirements*

- ▶ The Framework describes a governance structure for the management of proceeds.
- ▶ The Framework describes the processes and systems that will be used to track the proceeds.
- ▶ The Framework describes the intended temporary placement for the balance of unallocated proceeds.

*Additional considerations*

- ▶ Crelan will manage the proceeds from the financing using a portfolio approach.
- ▶ Crelan has committed to the following practices, which go beyond the core requirements:
  - ▶ The Bank defines an allocation period of 12 months.
  - ▶ Pending full allocation, temporary proceeds will be held in cash or cash equivalents in line with Crelan's general investment policy or be used to repay existing debts. Crelan will exclude repayments related to GHG-intensive and controversial activities.
  - ▶ The Bank will obtain external verification from an independent party for the allocation of proceeds on an annual basis.

**Reporting** **Aligned***Alignment with core requirements*

- ▶ Crelan will provide an annual allocation report until maturity.

*Additional considerations*

- ▶ Crelan has committed to the following practices, which go beyond the core requirements:
  - ▶ Crelan will have a category-level allocation report.
  - ▶ Crelan will report on the projects' qualitative and quantitative impact using relevant metrics.
  - ▶ The Framework indicates at least one impact metric for each category.
  - ▶ Crelan intends to adopt the ICMA Harmonized Framework for Impact Reporting, on a best-effort basis.

<sup>7</sup> European Commission, "Annex to the Commission Delegated Regulation", (2021), at: [https://ec.europa.eu/finance/docs/level-2-measures/taxonomy-regulation-delegated-act-2021-2800-annex-1\\_en.pdf](https://ec.europa.eu/finance/docs/level-2-measures/taxonomy-regulation-delegated-act-2021-2800-annex-1_en.pdf)

<sup>8</sup> For expenditures related to Green Building renovations and Clean Transportation.

<sup>9</sup> Crelan Group, "ESG Exclusion Policy", at: <https://www.crelan.be/sites/default/files/documents/Crelan%20ESG%20Exclusion%20Policy-EN-v01.pdf>

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- ▶ Crelan intends to obtain third-party verification for the impact report.
- ▶ The Bank will publish the allocation and impact reports on its website.

## Sustainability Contribution

Crelan intends to use the proceeds from instruments issued under the Framework to finance and refinance loans expected to lead to environmental benefits in Belgium.

We have assessed the overall Sustainability Contribution of the Framework as **Significant** based on the average Sustainability Contribution of the Framework's use of proceeds categories. We have weighted each category according to the expected percentage allocation indicated by Crelan to Sustainalytics.

### Sustainability Contribution



### Sustainability Contribution per Use of Proceeds Category

#### Green Buildings



We have assessed the Sustainability Contribution of the Green Buildings category as **Significant**.

Expenditures under this category include the construction, acquisition and ownership of residential and commercial buildings that rank among the most energy-efficient in Belgium and the renovation of buildings leading to energy efficiency improvements of at least 30%. The eligibility criteria do not require new buildings to be zero-emission-ready and renovations may use gas boilers, albeit with higher efficiency. However, these expenditures collectively are expected to significantly contribute to the decarbonization of the buildings sector.

#### Category Expenditures

Expenditure	Description
Acquisition and ownership of buildings	<ul style="list-style-type: none"> <li>Buildings constructed before 2020<sup>10</sup> that belong to the top 15% of the regional building stock in terms of the primary energy demand (PED). The top 15% is defined as buildings with an EPC demonstrating energy consumption of 150 kWh/m<sup>2</sup> per year or less.</li> <li>Buildings constructed from 2020 onwards that have an energy performance level (E-level) 10% lower than the local requirements for nearly zero energy buildings (NZEB).<sup>11,12</sup></li> </ul>
Construction of new buildings	<ul style="list-style-type: none"> <li>Buildings constructed between 2013 and 2019 that belong to the top 15% of the regional building stock in terms of PED.</li> <li>Buildings constructed from 2020 onwards that have an E-level 10% lower than the local requirements for NZEB.</li> </ul>

<sup>10</sup> Crelan defines the construction year of a financed building as the deed date of the mortgage plus one year.

<sup>11</sup> CA EPBD, "Countries - Individual Reports", (2021), at: [https://confluence.external-share.com/content/18675/ca\\_epbd\\_v\\_database\\_2020\\_\(public\)/1861813055](https://confluence.external-share.com/content/18675/ca_epbd_v_database_2020_(public)/1861813055)

<sup>12</sup> E-level scores are used in Belgium to reflect the energy performance of a building. Regional NZEB regulations outline the maximum energy performance or E-level that buildings constructed after 2021 must achieve. A lower E-level score indicates better energy performance.

<b>Renovation of buildings</b>	<ul style="list-style-type: none"> <li>▶ Renovations resulting in a PED reduction of at least 30% within three years compared to the pre-renovation level.</li> <li>▶ Renovation measures may include: i) replacement of boilers; ii) installation of solar-powered boilers; iii) installation of solar panels; iv) installation of heat pumps without defined criteria for the global warming potential (GWP) of refrigerants; v) installation of double-glazed windows; vi) insulation of roofs, walls and floors; vii) installation of thermostatic valves and control switches; and viii) energy audits.</li> </ul>
<b>Additional Information</b>	
<ul style="list-style-type: none"> <li>▶ Both commercial and residential buildings are eligible for financing.</li> <li>▶ Expenditures exclude the financing of assets in high flood risk areas and buildings dedicated to the storage, transport and exploration of fossil fuels.</li> <li>▶ Financed projects will follow the Federation of the Belgian Financial Sector's definition of an energy-efficient mortgage.<sup>13</sup></li> </ul>	

#### *Analytical Commentary*

Building operations accounted for 30% of global final energy consumption and 26% of energy-related GHG emissions in 2022.<sup>14</sup> In Belgium, the buildings sector accounted for 20% of the country's GHG emissions in 2022, while residential and commercial buildings met 39% and 40%, respectively, of their energy demand primarily with natural gas.<sup>15,16</sup> To reduce emissions from this sector, many countries, including Belgium, are strengthening building energy codes and promoting energy-efficient systems and renewable technologies in the built environment. However, decarbonization in the sector must accelerate to achieve net zero emissions by 2050. As of 2020, only 5% of new buildings worldwide were zero carbon-ready, while this share must increase to 100% by 2030 to keep pace with internationally agreed-upon climate goals.<sup>17</sup> Investments in energy-efficient and zero-emission-ready buildings are critical to bridging this gap and decarbonizing the buildings sector.

The Framework's eligibility criteria are expected to place financed buildings among the best performing buildings in Belgium with respect to energy efficiency. However, the Framework does not require new buildings' energy use to be free from fossil fuels, which exposes them to a risk of a fossil fuel lock-in. This risk is particularly relevant for new buildings constructed after 2024 due to their long lifespan and critical role in achieving net zero climate objectives. Regarding building renovations, Crelan may finance the replacement of old gas-fired boilers with gas models with higher efficiency and the installation of heat pumps that will not be required to meet a defined threshold for the GWP of refrigerants, among other specific measures. While these measures fall short with respect to addressing GHG emissions, they will constitute part of renovations that lead to a 30% reduction in energy consumption, thereby reducing GHG emissions from the existing

<sup>13</sup> Febelfin, "Proposal Belgian financial sector: Definition 'Energy Efficient' mortgage (for EEM label)", at: <https://febelfin.be/media/pages/publicaties/2023/belgian-financial-sector-definition-on-energy-efficient-mortgage/ae1d56a708-1701937045/belgian-financial-sector-definition-energy-efficient-mortgage-final-febelfin-version-2.0.pdf>

<sup>14</sup> IEA, "Tracking Buildings", (2023), at: <https://www.iea.org/energy-system/buildings>

<sup>15</sup> European Commission, "Climate Action Progress Report 2023 – Country Profile Belgium", (2023), at: [https://climate.ec.europa.eu/document/download/78cf1df3-339c-4d93-949b-41e041016177\\_en?filename=be\\_2023\\_factsheet\\_en.pdf](https://climate.ec.europa.eu/document/download/78cf1df3-339c-4d93-949b-41e041016177_en?filename=be_2023_factsheet_en.pdf)

<sup>16</sup> IEA, "Belgium: Energy Policy Review", (2022), at: [https://iea.blob.core.windows.net/assets/638cb377-ca57-4c16-847d-ea4d96218d35/Belgium2022\\_EnergyPolicyReview.pdf](https://iea.blob.core.windows.net/assets/638cb377-ca57-4c16-847d-ea4d96218d35/Belgium2022_EnergyPolicyReview.pdf)

<sup>17</sup> IEA, "Technology and Innovation Pathways for Zero-carbon-ready Buildings by 2030", (2022), at: <https://www.iea.org/reports/technology-and-innovation-pathways-for-zero-carbon-ready-buildings-by-2030>

building stock and supporting the transition toward a low carbon built environment. Collectively, these expenditures are expected to significantly contribute to the decarbonization of the building sector.

## Clean Transportation



**Strong**



We have assessed the Sustainability Contribution of the Clean Transportation category as **Strong**.

The Bank intends to finance the acquisition of zero-emission road transport vehicles in Belgium. These expenditures are expected to strongly support the decarbonization of the transport sector and contribute to achieving the long-term goal of zero-emission transport.

### Category Expenditures

Expenditure	Description
Acquisition of zero-emission vehicles	<ul style="list-style-type: none"> <li>▶ Includes fully electric passenger cars, motorcycles and light commercial vehicles.</li> <li>▶ Vehicles will not be dedicated to the transport of fossil fuels.</li> </ul>

### Analytical Commentary

The global transport sector accounted for 37% of CO<sub>2</sub> emissions from end use sectors in 2022 and relied on oil products for nearly 91% of its final energy use.<sup>18,19</sup> Road transport was the largest contributor, generating 73% of global transport emissions in 2022, followed by aviation, shipping and rail. In Belgium, road transport accounted for 96% of the sector's emissions in 2023.<sup>20</sup> To achieve climate neutrality by 2050, emissions from the global transport sector must decline by 25% by 2030, which will require scaling up the electrification of vehicles and the use of low-emission transportation. With transport volumes projected to double by 2050, investments in zero-emission vehicles are essential as part of broader efforts to decarbonize the sector.<sup>21</sup>

Expenditures under this category include the provision of loans for zero-emission passenger cars, motorcycles and light commercial vehicles. Given that electrification represents one of the most effective measures to address transport-related GHG emissions, these expenditures are expected to make a strong contribution to reducing GHG emissions from the transport sector.

<sup>18</sup> UN Environment Programme Finance Initiative, "Climate Risks in the Transportation Sector", (2024), at: <https://www.unepfi.org/wordpress/wp-content/uploads/2024/05/Climate-Risks-in-the-Transportation-Sector-1.pdf>

<sup>19</sup> IEA, "Transport", (2023), at: <https://www.iea.org/energy-system/transport>

<sup>20</sup> Government of Belgium, "Emissions by sector", at: <https://climat.be/en-belgique/climat-et-emissions/emissions-des-gaz-a-effet-de-serre/emissions-par-secteur>

<sup>21</sup> World Economic Forum, "7 Reasons Why Global Transport is so Hard to Decarbonize", (2021), at: <https://www.weforum.org/agenda/2021/11/global-transport-carbon-emissions-decarbonise/>

## Environmental and Social Risk Management

We have identified the following areas of environmental and social risk associated with the expenditures eligible under the Framework: land use and biodiversity loss; emissions, effluents and waste generated during construction; occupational health and safety; community relations; predatory lending and business ethics. Crelan has the following policies and processes in place to identify and mitigate such risks.

E&S risk identified	Applicable policies, procedures and measures
Land use and biodiversity loss; emissions, effluents and waste generated during construction	<ul style="list-style-type: none"> <li>▶ Crelan prohibits financing for companies and activities that have a negative impact on UNESCO-protected areas and wetland ecosystems designated under the Ramsar Convention of Wetlands.<sup>22</sup></li> <li>▶ The projects financed under the Framework will comply with Belgian environmental protection laws and regulations, which are governed by the federal regions. In the Flemish Region, construction projects must comply with the Flemish Regulation on Environmental Permits (Vlarem), which governs environmental pollution and safety risks,<sup>23</sup> as well as the Materials Decree<sup>24</sup> and Vlarema<sup>25</sup> regulations related to the management of construction and demolition waste. In the Walloon Region, construction projects must operate in accordance with the Environmental Code,<sup>26</sup> the Territorial Development Code,<sup>27</sup> the Water Code<sup>28</sup> and the Waste Decree<sup>29</sup> and obtain an environmental permit.<sup>30</sup> In the Brussels Capital Region, the projects will comply with the Spatial Planning Code,<sup>31</sup> which governs natural habitat conservation and mandates that construction projects take into consideration biodiversity, protected species, land, soil, water and air pollution, as well as waste generated in the construction and operation phases.</li> </ul>
Occupational health and safety	<ul style="list-style-type: none"> <li>▶ The Occupational Safety and Health Act of 1996 regulates the health and safety of employees across Belgium in accordance with EU Directive 89/391/EEC.<sup>32,33,34</sup></li> <li>▶ The Bank's credit lending process prohibits financing to companies in breach of labour rights. This includes businesses that provide unsafe working conditions or seriously violate labour</li> </ul>

<sup>22</sup> Crelan Group, "ESG Exclusion Policy", at: <https://www.crelan.be/sites/default/files/documents/Crelan%20ESG%20Exclusion%20Policy-EN-v01.pdf>

<sup>23</sup> Government of Flanders, "VLAREM", at: <https://omgeving.vlaanderen.be/vlarem>

<sup>24</sup> Government of Flanders, "Materialendecreet" (2011), at: <https://navigator.emis.vito.be/detail?wold=41777>

<sup>25</sup> Government of Flanders, "VLAREMA", (2012), at: <https://navigator.emis.vito.be/detail?wold=43991>

<sup>26</sup> Government of Wallonia, "17 mars 2005 - Code de l'environnement. - Livre Ier (Dispositions communes et générales)", (2005), at: <https://wallex.wallonie.be/eli/loi-decret/2005/03/17/200427101>

<sup>27</sup> Wallonie Service Public, "Code du Développement territorial", (2025), at: <https://territoire.wallonie.be/storage/territoire/documents/content/page/codt/codt.pdf>

<sup>28</sup> Government of Wallonia, "03 mars 2005 - Code de l'eau (Partie Décrétale)", (2005), at: <https://wallex.wallonie.be/eli/loi-decret/2005/03/03/111111111>

<sup>29</sup> Government of Wallonia, "09 mars 2023 - Décret relatif aux déchets, à la circularité des matières et à la propriété publique", at: <https://wallex.wallonie.be/eli/loi-decret/2023/03/09/2023044053/2023/08/10>

<sup>30</sup> Wallonie Service Public, "Le Permis Environnement", at: <https://permis-environnement.spw.wallonie.be/home/ressources/choix-des-rubriques.default.html?displayTab=arbre-a-rubriques&>

<sup>31</sup> Service Public Fédéral Justice, "Code bruxellois de l'aménagement du territoire (CoBAT)", (2004), at: <https://www.ejustice.just.fgov.be/eli/ordonnance/2004/04/09/2004A31182/justel#LNK0066>

<sup>32</sup> European Parliament, "Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment", (2014), at: <https://eur-lex.europa.eu/legalcontent/EN/TXT/PDF/?uri=CELEX:32014L0052&from=EN>

<sup>33</sup> European Agency for Safety and Health at Work, "OSH system at national level - Belgium", (2020), at: <https://oshawiki.osha.europa.eu/en/themes/osh-system-national-level-belgium# edn1>

<sup>34</sup> Government of Belgium, "Wet van 4 augustus 1996 betreffende het welzijn van de werknemers bij de uitvoering van hun werk (B.S. 18.9.1996)", (1996), at: [https://werk.belgie.be/sites/default/files/content/documents/Welzijn%20op%20het%20werk/Regelgeving/Wet\\_Welzijn.pdf](https://werk.belgie.be/sites/default/files/content/documents/Welzijn%20op%20het%20werk/Regelgeving/Wet_Welzijn.pdf)

	standards of the UN Global Compact <sup>35</sup> or the International Labour Organization. <sup>36,37</sup>
Community relations	<ul style="list-style-type: none"> <li>▶ Directive 2014/52/EU mandates public consultation for projects that are likely to have significant environmental effects and ensures that public opinions, comments and objections are taken into consideration.<sup>38</sup></li> <li>▶ Crelan maintains continuous engagement with customers and co-operative shareholders, including farmers, in local communities through its network of independent agencies and CrelanCo Foundation.<sup>39</sup></li> </ul>
Predatory lending and business ethics	<ul style="list-style-type: none"> <li>▶ Crelan's Integrity Policy outlines the Bank's ethical principles, including responsible lending. Under this policy, the Bank commits to treating all individuals equally and prohibits discrimination based on race, gender, age, disability, religion and political beliefs.<sup>40</sup></li> <li>▶ Crelan's Responsible Marketing Policy guides the Bank's approach to transparent client communication and pricing, avoidance of greenwashing and ethical data use.<sup>41</sup></li> <li>▶ The Bank has a compliance team with expertise in anti-money-laundering and anti-terrorist-financing.<sup>42</sup> It applies local and international sanctions to its clients and third-party relations,<sup>43</sup> carries out know-your-client checks on all counterparties and monitors client transactions for suspicious activities.<sup>44</sup> As per its ESG Exclusion Policy, the Bank complies with applicable legislation to prohibit financing of illegal activities, such as drugs, tax evasion, money laundering and terrorism.<sup>45</sup></li> <li>▶ Suspected unethical behaviour or violations of its Integrity Policy can be reported via the Bank's whistleblower channels.<sup>46</sup></li> </ul>

<sup>35</sup> UN Global Compact, "The Ten Principles of the UN Global Compact", at: <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>36</sup> International Labour Organization, "List of conventions", at: [https://normlex.ilo.org/dyn/nrmlx\\_en/f?p=NORMLXPUB:12200:0::NO::](https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLXPUB:12200:0::NO::)

<sup>37</sup> Crelan Group, "ESG Exclusion Policy", at: <https://www.crelan.be/sites/default/files/documents/Crelan%20ESG%20Exclusion%20Policy-EN-v01.pdf>

<sup>38</sup> European Commission, "Directive 2014/52/EU of the European Parliament and of the Council", (2014), at:

<https://eurlex.europa.eu/legalcontent/EN/TXT/PDF/?uri=CELEX:32014L0052>

<sup>39</sup> Crelan Group, "ESG Policy", at: <https://www.crelan.be/sites/default/files/documents/Crelan%20ESG%20Policy.pdf>

<sup>40</sup> Crelan Group, "Integriteitsbeleid - samenvatting", (2024), at: <https://www.crelan.be/sites/default/files/documents/integriteitsbeleid-samenvatting.pdf>

<sup>41</sup> Crelan Group, "Responsible Marketing Policy", (2025), at: <https://www.crelan.be/sites/default/files/documents/Crelan%20Responsible%20Marketing%20Policy.pdf>

<sup>42</sup> Crelan Group, "Pillar 3 Risk Disclosure Report 2024", at:

<https://www.crelan.be/sites/default/files/documents/Crelan%20Group%20Risk%20Disclosure%20Report%202024.pdf>

<sup>43</sup> Crelan Group, "Integriteitsbeleid - samenvatting", (2024), at: <https://www.crelan.be/sites/default/files/documents/integriteitsbeleid-samenvatting.pdf>

<sup>44</sup> Ibid.

<sup>45</sup> Crelan Group, "ESG Exclusion Policy", at: <https://www.crelan.be/sites/default/files/documents/Crelan%20ESG%20Exclusion%20Policy-EN-v01.pdf>

<sup>46</sup> Crelan Group, "Integriteitsbeleid - samenvatting", (2024), at: <https://www.crelan.be/sites/default/files/documents/integriteitsbeleid-samenvatting.pdf>

## Annex 1: Assessment Framework Overview

The following is a brief overview of the Assessment Framework that we use to assess debt instruments and the frameworks that support them. Using this Assessment Framework, we provide two key signals in our Second Party Opinions: **Principles Alignment** and **Sustainability Contribution**.

**Principles Alignment** indicates a framework's alignment with the requirements of applicable sustainable debt market Principles.<sup>47</sup> This assessment is structured according to the four components of the Principles: Use of Proceeds, Project Evaluation and Selection, Management of Proceeds and Reporting. Principles Alignment is expressed at one of following levels:

- ▶ **Aligned:** Meets all requirements across the four components.
- ▶ **Partially Aligned:** Meets requirements on two or three of the four components.
- ▶ **Not Aligned:** Does not meet requirements on most or all of the four components.

In addition, we provide commentary on any shortcomings as well as best practices.

Sustainability Contribution provides a clear and comparable signal of the expected contribution of the use of proceeds to one or more environmental or social objectives. We assess each expenditure defined in a framework by looking at the activities, assets and projects that they finance. This assessment is carried out using a set of factors that we have identified as driving the expenditure's contribution to a primary objective as well as its avoidance of harm to other objectives. The assessment results in one of the four levels of Sustainability Contribution described in the table below.

We determine the average contribution of the expenditures within each use of proceeds category (as defined by the issuer) to produce an expected Sustainability Contribution for each category. We then aggregate across categories to determine the Sustainability Contribution of a framework overall. In most cases, weight is distributed equally across use of proceeds categories. However, we adjust the weighting if information regarding percentage allocation is provided by the issuer.

Level of Sustainability Contribution	Description
 Strong	The expenditure finances an activity that makes a strong contribution to an environmental or social objective. The activity is well aligned with credible standards; there are no significant lock-in risks; and the risk of negative impact to other sustainability objectives is low.
 Significant	The expenditure finances an activity that makes a significant positive contribution to an environmental or social objective while having minor shortcomings compared to a strong contribution. This is either because the activity falls somewhat short of credible standards; there is some risk of lock-in (in the case of some environmental activities); there is a risk of negative impact to other sustainability objectives; or there is some ambiguity in the criteria for the expenditure.
 Moderate	The expenditure finances an activity that represents a step towards an environmental or social objective but has substantial shortcomings compared to expenditures that make a strong contribution. Although the activity will result in benefit over a relevant baseline, either it falls substantially short of credible standards; there is significant

<sup>47</sup> These primarily include the Green Bond Principles and the Social Bond Principles, published by the International Capital Market Association (ICMA); and the Green Loan Principles and the Social Loan Principles, published by the Loan Syndications and Trading Association, the Loan Market Association, the Asia Pacific Loan Market Association (LSTA-LMA-APLMA), and the Association of Southeast Asian Nations (ASEAN).

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risk of lock-in; there is significant ambiguity in the criteria; or there is a risk of significant negative impact to other sustainability objectives.

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The expenditure finances an activity that entails no net positive contribution to environmental or social objectives. Even in cases where there is some positive contribution to an objective, this is offset by shortcomings in other areas. Alternatively, the eligibility criteria may be unclear to the extent that contribution cannot be determined.

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## Scope of Work and Limitations

This Second Party Opinion provides a point-in-time independent opinion of the Framework as of the Evaluation Date. Our opinion may consider additional documentation and information that the Framework owner may have provided during the engagement, in addition to public and non-public information. The owner refers to the entity featuring as an issuer, borrower, special-purpose vehicle or any other entity as described in the Framework.

As part of this engagement, we communicated with representatives of the Framework owner, who acknowledge that: i) it is the sole responsibility of the Framework owner to ensure that the information provided is complete, accurate and up to date; ii) they have provided us with all of the relevant information; and iii) that all of the information has been provided in a timely manner.

This Second Party Opinion provides our opinion of the Framework and should be read in conjunction with that Framework. Any update of this Second Party Opinion will be conducted according to the agreed engagement conditions between Sustainalytics and the Framework owner.

Our Second Party Opinion provides our opinion on the alignment of the Framework with current market standards and practice but provides no guarantee of alignment nor warrants alignment with future versions of any such standards. In addition, it does not guarantee the realized allocation of proceeds towards eligible activities.

No information provided in this Second Party Opinion shall be considered as being a statement, representation, warrant or argument in favour or against the truthfulness, reliability or completeness of any facts or statements and related surrounding circumstances that the Framework owner may have made available to Sustainalytics for the purpose of this Second Party Opinion.

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