

# Second-Party Opinion

## Immobel Group Green Finance Framework



### Evaluation Summary

Sustainalytics is of the opinion that the Immobel Group Green Finance Framework is credible and impactful and aligns with the four core components of the Green Bond Principles 2021 and the Green Loan Principles 2023. This assessment is based on the following:



**USE OF PROCEEDS** The eligible category for the use of proceeds – Green Buildings – is aligned with those recognized by the Green Bond Principles and the Green Loan Principles. Sustainalytics considers that investments in the eligible category will lead to positive environmental impacts and advance the UN Sustainable Development Goals, specifically SDG 9.



**PROJECT EVALUATION AND SELECTION** Immobel has established a Green Finance Committee, which will be responsible for evaluating and selecting projects in line with the Framework’s eligibility criteria. Immobel’s ESG Department is responsible for the identification and management of environmental and social risks associated with eligible projects using the Company’s internal policies and standards. Sustainalytics considers the project selection process to be in line with market practice.



**MANAGEMENT OF PROCEEDS** Immobel’s Treasury department will be responsible for the management of proceeds and will use an internal accounting system to track the allocation of net proceeds using a portfolio approach. Immobel intends to allocate proceeds within 24 months of each issuance. Pending full allocation, unallocated proceeds will be held in cash or cash equivalent, in line with the Company’s treasury criteria. This is in line with market practice.



**REPORTING** Immobel will report on its website the allocation of proceeds and the corresponding impacts on an annual basis until full allocation. Allocation reporting will include: an overview of instruments issued under the Framework and the total outstanding amount yet to be fully allocated; allocation of outstanding and unallocated net proceeds from issued instruments to a portfolio of eligible assets; information on the composition of the portfolio of projects, including a breakdown by geographical area at the country level; share of financing versus refinancing; the amount of unallocated proceeds, if any; and the type of temporary investments. Sustainalytics views Immobel’s allocation and impact reporting as aligned with market practice.

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<b>Evaluation date</b>	December 12, 2024 <sup>1</sup>
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<b>Issuer Location</b>	Brussels, Belgium
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**For inquiries, contact the Sustainable Corporate Solutions project team:**

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**Siina Matihaldi (Amsterdam)**  
Project Manager  
[siina.matihaldi@morningstar.com](mailto:siina.matihaldi@morningstar.com)  
(+31) 20 205 0067

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**Camilla Bovati (Amsterdam)**  
Project Support

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**Enrico Tessadro (Amsterdam)**  
Client Relations  
[susfinance.emea@sustainalytics.com](mailto:susfinance.emea@sustainalytics.com)  
(+44) 20 3880 0193

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<sup>1</sup> This document is an update to the Second-Party Opinion originally provided by Sustainalytics on 22 March 2021.

## Introduction

Immobil Group (“Immobil” or the “Company”) is a real estate developer operating in Belgium, Luxembourg, Poland, France, Spain, Germany and the United Kingdom. Immobil specializes in the construction and renovation of residential, office and mixed-use properties. Headquartered in Brussels, Belgium, the Company has a project portfolio of EUR 4.7 billion and employs approximately 150 people as of September 2024.<sup>2,3</sup>

Immobil has developed the Immobil Group Green Finance Framework dated December 2024 (the “Framework”) under which it intends to issue unsecured green bonds, private placements,<sup>4</sup> and green loans,<sup>5</sup> and use the proceeds to finance and refinance, in whole or in part, existing or future assets, projects and activities that are expected to contribute to the decarbonization of the building stock in Europe. The Framework defines eligibility criteria in one area:

### 1. Green Buildings

Immobil engaged Sustainalytics to review the Framework and provide a Second-Party Opinion on the Framework’s environmental credentials and its alignment with the Green Bond Principles 2021 (GBP)<sup>6</sup> and the Green Loan Principles 2023 (GLP).<sup>7</sup> The Framework will be published in a separate document.<sup>8</sup>

### Scope of work and limitations of Sustainalytics’ Second-Party Opinion

Sustainalytics’ Second-Party Opinion reflects Sustainalytics’ independent<sup>9</sup> opinion on the alignment of the reviewed Framework with current market standards and the extent to which the eligible project categories are credible and impactful.

As part of the Second-Party Opinion, Sustainalytics assessed the following:

- The Framework’s alignment with the Green Bond Principles 2021, as administered by ICMA, and the Green Loan Principles 2023, as administered by LMA, APLMA and LSTA;
- The credibility and anticipated positive impacts of the use of proceeds; and
- The alignment of the issuer’s sustainability strategy and performance and sustainability risk management in relation to the use of proceeds.

For the use of proceeds assessment, Sustainalytics relied on its internal taxonomy, version 1.17, which is informed by market practice and Sustainalytics’ expertise as an ESG research provider.

As part of this engagement, Sustainalytics held conversations with various members of Immobil’s management team to understand the sustainability impact of its business processes and planned use of proceeds, as well as the management of proceeds and reporting aspects of the Framework. Immobil representatives have confirmed that: (1) they understand it is the sole responsibility of Immobil to ensure that the information provided is complete, accurate and up to date; (2) that they have provided Sustainalytics with all relevant information and (3) that any material information provided has been duly disclosed in a timely manner. Sustainalytics also reviewed relevant public documents and non-public information.

This document contains Sustainalytics’ opinion of the Framework and should be read in conjunction with that Framework.

Any update of the present Second-Party Opinion will be conducted according to the agreed engagement conditions between Sustainalytics and Immobil.

Sustainalytics’ Second-Party Opinion, while reflecting on the alignment of the Framework with market standards, is no guarantee of alignment nor warrants any alignment with future versions of relevant market

<sup>2</sup> Immobil, “Immobil Group Green Finance Framework”, (2024), at: <https://www.immobelgroup.com/en/publications/green-finance-framework>

<sup>3</sup> Immobil, “Immobil Half-Year 2024 Results – Operational Focus Delivers Positive Impact on Business despite Difficult Market Conditions”, at: <https://www.immobelgroup.com/en/news/immobil-half-year-2024-results-operational-focus-delivers-positive-impact-on-business-despite>

<sup>4</sup> Immobil has confirmed to Sustainalytics that private placements will be limited to debt placements.

<sup>5</sup> Immobil has communicated to Sustainalytics that loans may include multi-tranche facilities and revolving credit facilities.

<sup>6</sup> The Green Bond Principles are administered by the International Capital Market Association and are available at <https://www.icmagroup.org/green-social-and-sustainability-bonds/green-bond-principles-gbp/>.

<sup>7</sup> The Green Loan Principles are administered by the Loan Market Association, Asia Pacific Loan Market Association and Loan Syndications and Trading Association and are available at <https://www.lsta.org/content/green-loan-principles/>

<sup>8</sup> The Immobil Group Green Finance Framework is available at: <https://www.immobelgroup.com/en/publications/green-finance-framework>

<sup>9</sup> When operating multiple lines of business that serve a variety of client types, objective research is a cornerstone of Sustainalytics and ensuring analyst independence is paramount to producing objective, actionable research. Sustainalytics has therefore put in place a robust conflict management framework that specifically addresses the need for analyst independence, consistency of process, structural separation of commercial and research (and engagement) teams, data protection and systems separation. Last, but not the least, analyst compensation is not directly tied to specific commercial outcomes. One of Sustainalytics’ hallmarks is integrity; another is transparency.

standards. Furthermore, Sustainalytics' Second-Party Opinion addresses the anticipated impacts of eligible projects expected to be financed with bond and loan proceeds but does not measure the actual impact. The measurement and reporting of the impact achieved through projects financed under the Framework are the responsibility of the Framework owner.

In addition, the Second-Party Opinion opines on the potential allocation of proceeds but does not guarantee the realized allocation of the bond and loan proceeds towards eligible activities.

No information provided by Sustainalytics under the present Second-Party Opinion shall be considered as being a statement, representation, warrant or argument, either in favour or against, the truthfulness, reliability or completeness of any facts or statements and related surrounding circumstances that Immobil has made available to Sustainalytics for the purpose of this Second-Party Opinion.

## Sustainalytics' Opinion

### Section 1: Sustainalytics' Opinion on the Immobil Group Green Finance Framework

Sustainalytics is of the opinion that the Immobil Group Green Finance Framework is credible, impactful and aligned with the four core components of the GBP and GLP. Sustainalytics highlights the following elements of the Framework:

- Use of Proceeds:
  - The eligible category – Green Buildings – is aligned with those recognized by the GBP and GLP.
  - Immobil has communicated to Sustainalytics that projects financed under the Framework will be located in Belgium, Luxembourg, Poland, France, Spain and Germany.
  - Under the Green Buildings category, Immobil may finance or refinance residential and commercial buildings according to the following criteria:
    - Acquisition and ownership of buildings that: i) have obtained or are expected to obtain an energy performance certificate (EPC) A or above; or ii) belong in the top 15% of the national or regional building stock, expressed in terms of operational primary energy demand (PED).
    - Construction of new buildings that aim to achieve PED that is at least 10% lower than the threshold set for the applicable nearly zero-energy building (NZEB) requirements.
      - Office buildings certified, or expected to be certified, to the following minimum certification levels or equivalent: i) BREEAM Excellent;<sup>10</sup> or ii) HQE Excellent.<sup>11</sup> Sustainalytics views the above certification schemes as robust and credible.
      - Sustainalytics notes that it is market expectation to specify all eligible schemes and certifications, and encourages the Company to report on any specific schemes and certifications it intends to use.
      - Buildings larger than 5,000 m<sup>2</sup> must also be tested for airtightness and thermal integrity upon completion, and have a life cycle GHG potential calculated for each stage of the building's life cycle. Alternatively, buildings must employ robust and traceable quality control processes during construction.
    - Building renovations that lead to PED savings of at least 30% compared to the pre-retrofit state or that meet the applicable requirements for major renovations upon completion of the renovation. The renovations must meet the cost-optimal minimum energy performance requirements in the local rules implementing Directive 2010/31/EU (EPBD) where the building is located.<sup>12,13</sup>

<sup>10</sup> BREEAM: <https://breeam.com/standards/new-construction>

<sup>11</sup> HQE: <https://www.hqegbc.org/>

<sup>12</sup> Immobil has confirmed that major renovations follow the EU Directive 2010/31 definition for major renovations in the relevant jurisdiction.

<sup>13</sup> European Parliament, "Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010", (2010), at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32010L0031>

- Sustainalytics notes that the EU Taxonomy requires renovations to comply with the requirements for “major renovations” set in the applicable national and regional building regulations implementing the EPBD, so that the energy performance of the building or renovated part meets the cost-optimal minimum energy requirements of the EPBD. Sustainalytics therefore encourages Immobil to report on the actual improvement in primary energy demand performance or the energy savings achieved in comparison with the existing building stock in the area or region.
    - Renovations to office buildings where the renovation results in the achievement of one of the following minimum certification levels or equivalent: i) BREEAM Excellent;<sup>14</sup> or ii) HQE Excellent.<sup>15</sup>
    - Immobil has confirmed that buildings designed for the purpose of extraction, storage, transportation or manufacture of fossil fuels will be excluded from financing under the Framework.
    - Immobil has confirmed to Sustainalytics that it will limit financing to expenditures related to renovations, unless a building meets the criteria for acquisition and ownership of buildings or construction of new buildings as a result of a retrofit, in which case the asset value of the building can be financed.
      - Sustainalytics considers investments under this category to be in line with market practice.
  - Project Evaluation and Selection:
    - Immobil has established a Green Finance Committee (the “Committee”) that will be responsible for evaluating and selecting projects in line with the Framework’s eligibility criteria. The Committee consists of the Group Treasurer, the Group Head of ESG and the Group Legal manager.
    - Immobil’s ESG Department is responsible for the identification and management of environmental and social risks associated with eligible projects using the Company’s internal policies and standards. Sustainalytics considers these environmental and social risk management systems to be adequate and aligned with the requirements of the GBP and GLP. For additional details, see Section 2.
    - Based on the established process for project evaluation and selection, and the presence of a risk management system, Sustainalytics considers this process to be in line with market practice.
  - Management of Proceeds:
    - Immobil’s Treasury department will be responsible for the management of proceeds and will use an internal accounting system to track the allocation of net proceeds using a portfolio approach.
    - Immobil intends to allocate proceeds within 24 months of each issuance. Pending full allocation, unallocated proceeds will be held in cash or cash equivalent, in line with the Company’s treasury criteria.
    - The Company has communicated to Sustainalytics that instruments issued under the Framework may include multi-tranche loan facilities. The Company intends to label only those tranches of such facilities whose proceeds will be allocated according to the eligibility criteria in the Framework.
    - Based on the use of an internal tracking system and the disclosure of the temporary use of proceeds, Sustainalytics considers this process to be in line with market practice.
  - Reporting:
    - The Company will report on its website, the allocation of proceeds and the corresponding impacts on an annual basis until full allocation.
    - Allocation reporting will include: an overview of instruments issued under the Framework and the total outstanding amount yet to be fully allocated; allocation of outstanding and unallocated net proceeds from issued instruments to a portfolio of eligible assets; information on the composition of the portfolio of projects, including a breakdown by geographical area at the country level; the share of financing versus refinancing; the amount of unallocated proceeds, if any; and the type of temporary investments. The allocation of proceeds will be reviewed by an independent third party annually, until the proceeds have been fully allocated.

<sup>14</sup> BREEAM: <https://breeam.com/standards/new-construction>

<sup>15</sup> HQE: <https://www.hqegbc.org/>

- The Company has communicated to Sustainalytics that if it obtains revolving credit facilities, it will report on the allocation until loan maturity.
- Impact reporting will include relevant environmental impact metrics, where available, such as the green building certification level achieved.
- Based on the commitments to allocation and impact reporting, Sustainalytics considers this process to be in line with market practice.

### **Alignment with the Green Bond Principles 2021 and Green Loan Principles 2023**

Sustainalytics has determined that the Immobil Group Green Finance Framework aligns with the four core components of the GBP and GLP.

## **Section 2: Sustainability Strategy of Immobil**

### **Contribution to Immobil's sustainability strategy**

Immobil's sustainability strategy prioritizes climate change mitigation, supported by efforts to enhance biodiversity and advance circular economy.

Immobil has established a target to limit its embodied carbon emissions to 1,000 kgCO<sub>2</sub>/m<sup>2</sup> for new buildings and 750 kgCO<sub>2</sub>/m<sup>2</sup> for renovated buildings. The Company has also set a target to limit the embodied emissions to 650 kgCO<sub>2</sub>/m<sup>2</sup> for new construction by 2030. In addition, the Company intends to reach net zero operational emissions for all new developments by 2030 by using renewable energy sources, including geothermal energy, solar panels and heat pumps.<sup>16</sup> To achieve these targets, Immobil screens all its new investments and assets under development against the EU Taxonomy Technical Screening Criteria for a substantial contribution to climate change mitigation. The Company also assesses its buildings on air tightness and thermographic performance, and conducts life cycle assessments for the majority of its buildings.<sup>17</sup> Additionally, Immobil intends to ensure all its new office developments achieve certifications such as BREEAM Excellent, HQE Excellent or DGNB Platinum.<sup>18</sup>

Regarding circular economy, Immobil prioritizes renovation of existing buildings over demolition.<sup>19</sup> The Company integrates flexible and adaptable designs into its new developments, focusing on building disassembly and the adaptability of buildings. Immobil also evaluates the availability and feasibility of reused and recycled materials for both renovation projects and new construction.

With respect to biodiversity, Immobil aims to achieve biodiversity net gain for each of its new developments and an average 25% Biotope Area Factor (BAF)<sup>20</sup> score in the urban areas at the company level by 2025.<sup>21</sup> Additionally, the Company has set a target to reduce its land use by 30% by 2030 and to avoid using any new land for its projects by 2050. To achieve these targets, the Company collaborates with landscapers and ecologists to assess the level of biodiversity on the sites and to implement restorative strategies.

Sustainalytics is of the opinion that the Immobil Group Green Finance Framework is aligned with Immobil's overall sustainability strategy and initiatives and will further the Company's action on its key environmental priorities.

### **Approach to managing environmental and social risks associated with the projects**

Sustainalytics recognizes that the proceeds from the instruments issued under the Framework will be directed towards eligible projects that are expected to have positive environmental or social impacts. However, Sustainalytics is aware that such eligible projects could also lead to negative environmental and social outcomes. Some key environmental and social risks possibly associated with the eligible projects may include issues involving: i) land use and biodiversity loss; ii) emissions, effluents and waste generated in construction; iii) occupational health and safety (OHS); iv) community relations; and v) business ethics.

Sustainalytics is of the opinion that Immobil is able to manage and mitigate potential risks by implementing the following measures:

- Regarding risks related to land use and biodiversity loss, projects financed in the EU are expected to comply with Directive 2014/52/EU, which requires projects that are likely to have significant

<sup>16</sup> Immobil, "ESG Report 2023", at: <https://www.immobelgroup.com/sites/default/files/2024-03/Immobil%20-%202023%20ESG%20report.pdf>

<sup>17</sup> Ibid.

<sup>18</sup> DGNB: <https://www.dgnb.de/en/>

<sup>19</sup> Immobil, "ESG Report 2023", at: <https://www.immobelgroup.com/sites/default/files/2024-03/Immobil%20-%202023%20ESG%20report.pdf>

<sup>20</sup> The BAF score indicates, on a scale from 0 to 1, a project's ecologically effective surface area weighted by the degree of soil permeability (0 = impermeable, 1 = open soil), divided by the total land area.

<sup>21</sup> Immobil, "ESG Report 2023", at: <https://www.immobelgroup.com/sites/default/files/2024-03/Immobil%20-%202023%20ESG%20report.pdf>

environmental effects to be adequately assessed before approval.<sup>22</sup> It also requires such projects to have in place adequate measures to avoid, prevent, reduce and, if possible, offset significant adverse effects on the environment, in particular on species and habitats. For land-intensive projects, the directive mandates land use-related impacts to be identified, described and assessed through an environmental impact assessment. Large-scale projects must also limit impacts on land and soil, including organic matter, erosion, compaction and sealing. Additionally, projects in the EU must follow the EU Habitats Directive and Birds Directive, which are part of the EU's Biodiversity Strategy for 2030 and require EU Member States to conserve the diversity of their wild flora and fauna, with a special focus on threatened and endemic species.<sup>23,24</sup> In addition to the legal requirements, Immobel intends to assess its projects' impact on biodiversity by measuring the BAF score or Biodiversity Net Gain score before and after construction in developments in Belgium.<sup>25</sup> For developments in Luxembourg, Immobel intends to apply loan ecological compensation principle and mandate its developers to repair any environmental damage caused by construction.<sup>26,27</sup> Immobel communicated to Sustainalytics that the Company may also conduct biodiversity net gain calculations at specific sites.<sup>28</sup>

- Regarding emissions, effluents and waste generated during construction, Directive 2008/98/EC<sup>29</sup> requires companies in the EU to manage their construction and demolition waste without causing harm to human health or the environment. Additionally, Immobel conducts environmental impact assessments, which evaluate the related environmental risks throughout a project's lifetime.<sup>30</sup>
- To address occupational health and safety risks, Immobel requires its contractors and subcontractors to follow applicable occupational, health and safety (OHS) regulations.<sup>31</sup> Immobel has communicated to Sustainalytics that the Company is currently updating its external code of conduct, covering its requirements for OHS, which it aims to publish in Q1 2025.
- With respect to community relations, Immobel states that it develops neighbourhoods in close collaboration with applicable stakeholder groups to increase functional, social and economic diversity and diversity in the built environment in its neighbourhoods.<sup>32</sup> The Company conducts client surveys regularly and engages with non-profit organizations to support the dialogue between public, private and third-sector stakeholders.<sup>33</sup>
- Regarding business ethics, Immobel's Anti-Bribery, Corruption and Conflicts of Interest Policy describes processes to prevent, detect, manage and report instances of bribery, influence peddling, conflicts of interest, gifts, facilitation payments and corruption.<sup>34</sup> The Company also has an anonymous whistleblower process that allows employees and third parties to report suspected misconduct.<sup>35</sup>
- Sustainalytics notes that the eligible projects will be located in Belgium, Luxembourg, Poland, France, Spain and Germany, which are recognized as Designated Countries under the Equator Principles,<sup>36</sup> indicating the presence of robust environmental and social governance systems, legislation and institutional capacity to protect the environment and communities, including stakeholder engagement.

Based on these policies, standards and assessments, Sustainalytics is of the opinion that Immobel has implemented adequate measures and is well positioned to manage and mitigate environmental and social risks commonly associated with the eligible categories.

<sup>22</sup> European Parliament, "Directive 2014/52/EU of the European Parliament and of the Council", (2014), at: <https://eur-lex.europa.eu/legalcontent/EN/TXT/?uri=celex%3A32014L0052>

<sup>23</sup> European Commission, "Biodiversity strategy for 2030", at: [https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030\\_en](https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030_en)

<sup>24</sup> European Parliament, "Directive 2009/147/EC of the European Parliament and of the Council", (2009), at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32009L0147>

<sup>25</sup> Immobel, "ESG Report 2023", at: <https://www.immobelgroup.com/sites/default/files/2024-03/Immobel%20-%202023%20ESG%20report.pdf>

<sup>26</sup> Ibid.

<sup>27</sup> Government of Luxembourg, "La Compensation Écologique en Bref", at: <https://environnement.public.lu/dam-assets/documents/natur/biodiversite/compensation/Eco-Points-Brochure.pdf>

<sup>28</sup> Guide Bâtiment Durable, "Évaluation du projet via le CBS+ (Coefficient de biotope par surface renforcé)", at: <https://guidebatimentdurable.brussels/favoriser-biodiversite/evaluation-projet-via-cbs-coefficient-biotope-surface-renforce>

<sup>29</sup> European Commission, "Directive 2008/98/EC on waste", (2008), at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32008L0098>

<sup>30</sup> Immobel, "ESG Report 2023", at: <https://www.immobelgroup.com/sites/default/files/2024-03/Immobel%20-%202023%20ESG%20report.pdf>

<sup>31</sup> Ibid.

<sup>32</sup> Ibid.

<sup>33</sup> Ibid.

<sup>34</sup> Immobel, "Immobel Anti-Bribery, Corruption and Conflicts of Interest Policy", (2023) at: [https://www.immobelgroup.com/sites/default/files/2023-09/Immobel\\_ABC%20policy%20-%20FINAL%20ENG.pdf](https://www.immobelgroup.com/sites/default/files/2023-09/Immobel_ABC%20policy%20-%20FINAL%20ENG.pdf)

<sup>35</sup> Immobel, "Welcome to IntegrityLog", at: <https://immobel.integrity.complylog.com/>

<sup>36</sup> Equator Principles, "About the Equator Principles", at: <https://equator-principles.com/about-the-equator-principles/>

### Section 3: Impact of Use of Proceeds

The use of proceeds category is aligned with those recognized by the GBP and GLP. Sustainalytics focuses below on where the impact is specifically relevant in the local context.

#### Importance of financing green buildings in Belgium

The buildings sector accounted for 34% of energy-related emissions in the EU in 2022.<sup>37</sup> The EU has committed to reducing GHG emissions from buildings by 60% by 2030 compared to 2015, in line with its pledge to cut total GHG emissions by 55% by 2030, compared to 1990 levels.<sup>38,39</sup> The 2024 revision of the EU Energy Performance of Buildings Directive (EPBD) supports these objectives, requiring all new public residential and non-residential buildings to be zero emissions from 2028 and all other new buildings from 2030.<sup>40</sup>

Meanwhile, in 2022, Belgium’s building sector accounted for 20% of the country’s GHG emissions.<sup>41</sup> In the same year, residential and commercial buildings met their energy demand primarily with natural gas, at 39% and 40%, respectively.<sup>42</sup> Furthermore, approximately 80% of Belgium’s building stock was constructed in 1991, before the establishment of energy-efficiency standards.<sup>43</sup> In this context, Belgium has committed to reducing its GHG emissions by 35% by 2030 compared to 2005 levels and achieving carbon neutrality by 2050.<sup>44</sup> Within the building sector, the Belgian government aims to achieve complete decarbonization by 2050 through retrofits and energy-efficient solutions, such as smart technologies, and a carbon-free energy mix.<sup>45</sup> To support this goal, Belgium will invest EUR 1 billion in energy-efficiency measures for buildings as part of its National Recovery and Resilience Plan, which was announced in 2021 and further updated in 2023.<sup>46</sup>

Given the above context, Sustainalytics is of the opinion that Immobel’s financing of green buildings is expected to contribute to the decarbonization of the building stock in Belgium and more broadly to the EU’s emissions reduction targets.

#### Contribution to SDGs

The Sustainable Development Goals were adopted in September 2015 by the United Nations General Assembly and form part of an agenda for achieving sustainable development by 2030. The instruments issued under the Immobel Group Green Finance Framework are expected to help advance the following SDG and target:

Use of Proceeds Category	SDG	SDG target
Green Buildings	9. Industry, Innovation and Infrastructure	9.4 By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities

<sup>37</sup> European Environment Agency, “Greenhouse gas emissions from energy use in buildings in Europe”, (2024), at: <https://www.eea.europa.eu/en/analysis/indicators/greenhouse-gas-emissions-from-energy?activeAccordion=546a7c35-9188-4d23-94ee-005d97c26f2b>

<sup>38</sup> European Commission, “Stepping Up Europe’s 2030 climate ambition”, (2020), at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0562>

<sup>39</sup> European Commission, “A Renovation Wave for Europe - greening our buildings, creating jobs, improving lives”, (2020), at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1603122220757&uri=CELEX:52020DC0662>

<sup>40</sup> European Commission, “Nearly-zero energy and zero-emission buildings”, at: [https://energy.ec.europa.eu/topics/energy-efficiency/energy-efficient-buildings/nearly-zero-energy-and-zero-emission-buildings\\_en](https://energy.ec.europa.eu/topics/energy-efficiency/energy-efficient-buildings/nearly-zero-energy-and-zero-emission-buildings_en)

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>42</sup> Ibid.

<sup>43</sup> European Investment Bank, “Belgium: The EIB and Wallonia join forces for energy-efficient public buildings in the region”. (2022), at: <https://www.eib.org/en/press/all/2022-184-la-wallonie-et-l-europe-s-unissent-en-faveur-de-l-efficacite-energetique-des-batiments-publics-wallons>

<sup>44</sup> Housing Europe, “Recovery and Resilience Plan Belgium”, at: <https://www.housingeurope.eu/file/1081/download>

<sup>45</sup> Government of Belgium, “Vision and strategic workstreams for a decarbonised Belgium by 2050”, (2020), at: <https://climat.be/doc/visionandstrategicworkstreamsforadecarbonisedbelgiumby2050.pdf>

<sup>46</sup> European Commission, “Belgium’s recovery and resilience plan”, at: [https://commission.europa.eu/business-economy-euro/economic-recovery/recovery-and-resilience-facility/country-pages/belgiums-recovery-and-resilience-plan\\_en](https://commission.europa.eu/business-economy-euro/economic-recovery/recovery-and-resilience-facility/country-pages/belgiums-recovery-and-resilience-plan_en)

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## Conclusion

Immobel has developed the Immobel Group Green Finance Framework, under which it may issue green bonds, private placements and originate green loans, and use the proceeds to finance green buildings in Belgium, Luxembourg, Poland, France, Spain and Germany. Sustainalytics considers that the eligible projects are likely to have positive environmental impacts.

The Framework outlines a process for tracking allocation and management of proceeds, and makes commitments to report on allocation and impact. Sustainalytics is of the opinion that Immobel Group's Green Finance Framework is aligned with the overall sustainability strategy of the Company and that the use of proceeds categories will contribute to the advancement of UN Sustainable Development Goal 9. Additionally, Sustainalytics is of the opinion that Immobel has adequate measures in place to identify, manage and mitigate environmental and social risks commonly associated with the eligible projects.

Based on the above, Sustainalytics is confident that Immobel is well positioned to issue green bonds and loans, and that the Immobel Group Green Finance Framework is robust, transparent and in alignment with the four core components of the Green Bond Principles 2021 and Green Loan Principles 2023.



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