ENVIRONMENTAL POLICY

December 2025

Ethias – Internal Data: Accessible only to colleagues and identified contractual partners.

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INTRODUCTION

Fighting climate change is one of the greatest global challenges and a major issue for the insurance sector. Extreme weather events, which are becoming more frequent and intense, are increasing the frequency and severity of claims, ultimately threatening the profitability and financial stability of insurance companies.

At the same time, the loss of biodiversity is another major challenge, as it weakens ecosystems and increases the risk of natural disasters.

By fully integrating these issues into its strategy, the Ethias group can play a key role in strengthening the sector's environmental and economic resilience. By focusing on innovative and sustainable solutions and adapting its business model to these new realities, the Ethias group is reaffirming its mission to protect its customers from these emerging risks while actively contributing to the preservation of ecosystems, which are essential to building a more stable and sustainable future.

ENVIRONMENTAL AMBITIONS

CLIMATE CHANGE MITIGATION

To reduce the negative impact of its activities on the environment, Ethias SA has been assessing the carbon footprint of its operational emissions since 2012, KEYES SA since 2015, and the Ethias Group since 2023.

In 2020, Ethias drew up its first Change Over transition plan in which it set out its ambition and trajectory to achieve a maximum reduction of its own CO2 emissions (scope 1 and 2) by 2030 using the GreenHouse Gas Protocol Standard method.

In 2016, KEYES committed to the Walloon Region's sectoral agreements, an initiative that would lead to a drastic reduction in direct CO2 emissions, a major improvement in energy efficiency and substantial green energy production.

The Ethias group increases its ambitions every year. That is why, in December 2022, the company decided to go one step further by signing SBTi's Net-Zero 2050 commitment.

This strong commitment, which involves setting and monitoring decarbonisation targets in line with the Paris Agreement and based on internationally recognised scientific methods, reinforces the groups' ambition to decarbonise its entire value chain by 2050. These long-term targets will have to be submitted to the SBTi scientific committees for assessment within 2 years of the publication of the standards relating to the financial sector, expected in July 2025.

Meanwhile, the Ethias group has been actively working on an intermediate transition plan, looking forward to 2030 ("near-term targets"), in compliance with the SBTi criteria. With this plan, Ethis will better anticipate the necessary actions to achieve the transition by 2050.

IN OUR OWN OPERATIONS

The Ethias group has implemented a strategy whose main objective is to eliminate the use of fossil fuels in its operations to reduce its CO2 emissions as much as possible by 2030.

The Ethias group relies on a 4-stage reference framework that will help the company to achieve an increasingly high level of decarbonisation :

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- Reduce: reduce unnecessary energy consumption as much as possible, and use energy resources sparingly.
- Improve efficiency: improve the efficiency of what can't be eliminated.
- Shift technology: transform energy generators (motors, boilers, etc.) so we can stop using fossil fuels.
- Remove: any remaining carbon will have to be captured to reduce its presence in the atmosphere.

The two operational areas that currently rely the most on fossil fuels are mobility and buildings.

Mobility

The Ethias group's decarbonisation strategy for mobility is based on:

- electrification of the vehicle fleet;
- ambitious homeworking policy;
- encouraging employees to change their behaviour in terms of mobility: car-pooling, multimodal mobility, cycling, public transport, etc.

Buildings

Streamlining real estate portfolio

The Ethias group has been streamlining its real estate assets for many years, while maintaining excellent working conditions for its employees. This reduction in surface area helped to steadily reduce the building-related carbon footprint.

Increasing the energy efficiency of our buildings

In 2023, the Hasselt head office underwent a major renovation, achieving BREEAM Very Good certification, largely due to the installation of new geothermal heat pumps.

In 2025, the Liège head office moved to a carbon-neutral building at the heart of the new "Rives Ardentes" eco-district in Liège.

100% green electricity

To ensure the consistency of its policy, the Ethias Group has entered into electricity supply contracts ensuring 100% renewable energy sources for all buildings where it is the owner (hydroelectric, wind, cogeneration or solar).

OUR PROCUREMENT

The Procurement departments of Ethias and KEYES ensure that sustainability criteria are integrated into their supplier selection process. Ethias and KEYES is committed to a policy of responsible purchasing and to maintaining long-term relationships with their suppliers.

The Responsible Procurement Policy specifies sustainability criteria for every new contract, such as energy consumption and savings, carbon footprint reduction, use of recyclable materials and consumables, waste reduction, etc.

By implementing such criteria for selecting suppliers, Ethias and KEYES are able to mitigate the risks involved in their supply chain.

When selecting its suppliers, Ethias and KEYES ensure that calls for tender for products and services include ESG components. This takes the form of an ESG questionnaire sent to the contacted suppliers. The answers to this questionnaire are taken into account in the evaluation criteria for a call for tenders and form an integral part of the weighting leading to the selection of the supplier.

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These criteria are set out in a charter that translates the principles in terms respect for human and environmental rights and to which each new supplier is asked to comply with. When suppliers sign a contract with Ethias SA or KEYES SA, they agree to comply with this charter.

The Ethias group's commitment to the gradual decarbonisation of its activities also covers the scope of its procurement and involves setting and monitoring targets in terms of the proportion of its emissions linked to suppliers who share the same type of commitment to decarbonising their activities.

OUR INVESTMENTS

Ethias also includes its investments in the decarbonisation scope, since they account for the largest share of its indirect emissions.

Making Ethias asset management carbon-free will be a key element of Ethias' transition. As a financial institution, Ethias is a catalyst that helps accelerate the transition in key sectors where long-term investment is essential (such as sustainable transport, green energy infrastructure, building renovation...).

Taking into account the environmental strategy of companies is naturally an essential part of Ethias' ESG integration strategy with regard to all its investments. Through its exclusion policy (aligned with the exclusion criteria of Febelfin's Towards Sustainability label), Ethias ensures that thermal coal and non-conventional oil and gas, which involve complex extraction methods and have a particularly harmful impact on the environment, are completely excluded from its investments.

In the conventional oil and gas and power generation sectors, Ethias only invests in companies that are committed to moving towards a sustainable, low-carbon model.

Finally, Ethias supports a number of market initiatives, such as Climate Action 100+ and the Belgian Alliance for Climate Action, which aim to bring together financial players to reduce the emissions linked to their investments.

OUR INSURANCE ACTIVITIES

Ethias aims to measure the baseline of its insured emissions in order to be prepared to act on this lever in the coming years, depending on sectoral and regulatory developments.

CO2 emissions linked to claims management are also being estimated, although Ethias, like other insurance companies, faces the challenge of the availability of the data needed to estimate these emissions.

At the same time, Ethias is positioning itself as a facilitator, supporting its clients in their transition, i.e. by offering advice on implementing preventive measures.

Ethias is also working to create an increasingly sustainable range of non-life insurance products.

Lastly, Ethias is actively raising awareness among its network of approved repairers and closely monitors market developments in order to identify courses of action that would promote the circular economy and reduce CO2 emissions.

IN OUR IT ACTIVITIES

KEYES relies on data centres powered by 100% green energy, ensuring a low-carbon infrastructure from the outset.

Environmental criteria are also considered when selecting new technologies, so that each development or investment contributes to a lasting reduction in the impacts of digital services.

At the same time, KEYES implements responsible digital practices, aimed in particular at increasing the energy efficiency of usage and limiting resource consumption.

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These initiatives also include awareness-raising and support measures, both internally and for our clients, to promote more sustainable digital behaviour.

Finally, KEYES closely monitors technological and regulatory developments to continuously identify new avenues for action in favour of a more resource-efficient and environmentally responsible IT sector.

CLIMATE CHANGE ADAPTATION

IN OUR OWN OPERATIONS

Identifying the discontinuity risks linked to climate change is a priority to ensure the operational resilience of our business. These risks, which are often complex and multi-dimensional, include physical threats such as natural disasters, such as floods, which can significantly affect critical infrastructure (premises, data centres, etc.) and business continuity.

An annual analysis of these risks is essential to:

- measure the impact of extreme weather events on key assets, such as data centres, critical equipment and strategic infrastructure;
- identify the specific vulnerabilities of installations and processes to unforeseen climatic variations.

Ethias and KEYES regularly test their resilience to potential scenarios that could affect their infrastructures.

However, climate change also requires long-term thinking about the sustainability of infrastructure. This includes designing resilient buildings and data centres to withstand predicted future climate conditions and investing in environmentally responsible solutions. Ethias and KEYES take these factors into account in its building-related projects, both in the design phase and in infrastructure renovation projects.

OUR INVESTMENTS

Ethias is aware of the importance of taking into account the physical and transitional risks that have a potential impact on its investment portfolio and performance. Climate change is creating financial risks for companies, particularly in terms of the transition to a low-carbon economy, and these risks can have an impact on the value of investments.

Ethias has included environmental, social and governance criteria into its investment decisions and has made its ESG integration policy public. For all asset classes, Ethias applies the principle of double materiality, by identifying the likely impacts of sustainability risks on product performance and the risk of material adverse impacts on the sustainability (ESG) factors of each investment.

With this proccess, Ethias can identify companies that are better prepared to face these risks, such as those with a clear strategy for reducing their carbon footprint and adapting to climate change. Ethias believes that these companies are better positioned to generate solid long-term financial performance.

Integrating environmental criteria into investment decisions ensures a clear link between strategy and risk mitigation action.

OUR INSURANCE ACTIVITIES

An insurance company must be able to cope with any kind of change in its external environment. Resilience is an important factor in guaranteeing clients a long-term service that will meet their new needs and current laws.

Ethias opted for a proactive management of climate risks, which deserves special attention and management given the potential material impact and increased likelihood of occurrence for this type of risk.

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Firstly, for the forecasting of physical risks linked to climate, such as floods and storms, Ethias now uses tools based on climate change models to develop insurance rates and coverage that better suit the specific needs of Belgium and its regions.

Then, Ethias upgrades the range of prevention services for B2B customers, to help them manage their own ESG risks. In addition, a thorough understanding of environmental regulations helps Ethias to anticipate legislative changes for its clients too, and to offer advice and products tailored to their needs.

IN OUR IT ACTIVITIES

An IT company must be able to cope with the rapid transformations in its environment, including impacts related to climate change. Its resilience is essential to providing clients with continuous and sustainable digital services while meeting the ever-evolving legal and environmental requirements.

KEYES has taken a proactive approach to managing climate and energy risks, which require particular attention given their growing influence on the performance and stability of digital infrastructure.

First, in order to anticipate physical risks such as heatwaves or flooding, KEYES adapts the design and management of its data centres to new climate conditions (cooling optimisation, site redundancy, secured energy supply).

Second, KEYES develops and strengthens its responsible digital practices by incorporating environmental criteria into its technology choices and deploying best practices that promote energy efficiency.

Finally, through active monitoring of technological and regulatory developments, KEYES is able to anticipate upcoming changes and offer innovative, tailored services, aligned with growing concerns around climate and the energy transition.

BEYOND CLIMATE

The Ethias groups wants to protect, preserve and restore biodiversity. Strengthening natural capital (air, water and soil, as well as forest, marine, freshwater and wetland ecosystems) is also a concern. The partnership with Natuurpunt since 2022 is a first step in this direction. The aim of this partnership is to purchase land around the Zwarte Beek valley to create a protected area. The goals of this project is to regenerate the soil and improve its absorption capacity in order to preserve water reserves and prevent the risk of flooding. This ecosystem is also unique in that it naturally captures CO2.

This partnership was extended to the Natagora non-profit in 2024.

These various actions and partnerships are part of the Ethias group's desire to gradually develop climate risk prevention strategies based on nature-based solutions.

In addition to its philanthropic activities, the group's ambition is to measure, in the same way as for carbon, its impact on nature through the prism of its investment activity.

Finally, in its own operations, the Ethias group strives to reduce the use of resources such as water and paper.

COMMITMENTS

The Ethias group is actively seeking to join initiatives that bring together agents of the transition. As part of its **Commitment Policy**, Ethias has taken part in several collaborative engagement initiatives.

Partnership for Biodiversity Accounting Financials (PBAF)

PBAF is a partnership of 30 financial institutions working together to develop the PBAF standard, which enables financial institutions to assess and disclose the biodiversity impacts and dependencies of loans and

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investments. Understanding the impacts (positive and negative) of its investment portfolio on biodiversity is an important objective.

Ethias is the first Belgian player to join PBAF.

Belgian Alliance for Climate Action (BACA)

BACA is a Belgian initiative led by The Shift and WWF that aims to encourage the adoption of a science-based approach to reduce the environmental impact of companies.

Ethias is among the first Belgian insurers to join BACA in 2021.

Climate Action 100+

The Climate Action 100+ initiative, consisting of 617 global investors, aims to ensure that the (165) largest emitters of greenhouse gases take the necessary action on climate change. Ethias is among the first Belgian insurers to join Climate Action 100+

Science Based Targets Initiative (SBTi)

After joining BACA in 2021, the Ethias group has committed to SBTi in 2022. Ethias' ambition is to obtain an independent approval (within a maximum of 2 years) for its plan including intermediate decarbonisation targets (based on recognised scientific methods) in order to achieve Net Zero in line with the objectives of the Paris Climate Agreement.

Sustainable IT Charter of the Belgian Institute for Sustainable IT (ISIT)

The Sustainable IT Charter is a voluntary commitment by over 1,000 organisations for more sustainable, ethical and inclusive digital practices.

It is part of a continuous improvement approach, encouraging companies to challenge their practices, share knowledge and progress towards a more responsible digital sector.

GOVERNANCE AND FOLLOW-UP

SCOPE

This environmental policy applies to the Ethias Group.

FOLLOW-UP AND UPDATE

Unless there is a major change, Ethias' environmental policy is reviewed every three years to take into account any changes in the way it manages environmental issues arising from regulatory or market developments.

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OWNERSHIP AND RACI MATRIX

The Executive Committee is responsible for approving the environmental policy. The Sustainability team coordinates its implementation. All actions arising from this policy are the responsibility of the different departments concerned.

Scope	Topics	Sub-topics	Responsible	Accountable	Consulted	Informed
Ethias Group	Coordination of environmental policy and goals		Sustainability Ethias SA	CFO => Steerco ESG => EC	All departments involved (including Group entities)	BoD
Mitigating climate change – In our own operations						
Ethias SA	Mobility	Vehicle fleet	P&O Analytics	CPOO	Sustainability	Steerco ESG
		Working from home	HR Projects	CPOO	Sustainability	Steerco ESG
		Alternative mobility	HR Projects	CPOO	Sustainability	Steerco ESG
	Buildings	Streamlining real estate portfolio	Organisation Effectiveness	CPOO	Sustainability	Steerco ESG
		Increasing the energy efficiency of our buildings	Organisation Effectiveness	CPOO	Sustainability	Steerco ESG
		100% green electricity	Organisation Effectiveness	CPOO	Sustainability	Steerco ESG
Mitigating climate change – Our procurement						
Ethias SA	Purchases of goods and services in the Procurement scope, excluding IT purchases and leases		Procurement	CFO	Sustainability	Steerco ESG
Mitigating climate change – Our investments						
Ethias SA	Investments		Investment Management; Real Estate	CILO, SRIC	Sustainability	Steerco ESG
Mitigating climate change – Our insurance activities						
Ethias SA	Insurance activities		Sales & Non-Life Underwriting B2B;	CXO, CCDO	Sustainability	Steerco ESG

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			Sales & Customer Care Retail Claims			
Climate change adaptation						
Ethias SA	Own operations		Risk Management	CRO	Sustainability	Steerco ESG
	Investments		Investment Management; Real Estate	CILO, SRIC	Sustainability	Steerco ESG
	Insurance activities		Product, Pricing & Reinsurance	CXO	Sustainability	Steerco ESG
Other						
Ethias SA	Beyond Climate		Sustainability	CFO	/	Steerco ESG
	Commitments		Sustainability	CFO => Steerco ESG => EC	All departments involved	Steerco ESG
KEYES Group	Environmental Policy		Team ESG KEYES SA	Sustainability Ethias	All entities of the KEYES Group	Group Comex KEYES SA Comex Steerco ESG

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FOR MORE INFORMATION

Ethias
Voie Gisèle Halimi 10 - 4000 Liège

Tél. 04 220 31 11
Fax 04 249 63 10

info@ethias.be