

Sustainability Statement

WEALINS S.A. is a financial market participant under Regulation (EU) 2019/2088 (i.e. SFDR) and in our dual role as a sustainable insurance provider and responsible investor, we aim to carry out our mission of delivering a positive impact on our environment and society while generating revenues and adding value to our clients. Our group approach on sustainability as part of the Foyer Group has been recognised with the ESR label¹, a double recognition we received at European level together with the RE label².

Our approach to Sustainability is engrained in the overall framework set out by Foyer Group, to which WEALINS S.A. belongs and which is summarised in the [Sustainability Statement](#) published on the [Group's website](#).

SFDR related disclosures

Integration of Sustainability risks in investment decision-making process (Article 3 SFDR)

WEALINS S.A. acts as a distributor of unit-linked life insurance or capitalisation contracts and advisor. We offer the following products: external (UCITS, etc.) and or internal collective funds, dedicated and/or specialised insurance funds set up and managed in accordance with Luxembourg regulatory provisions, and in particular the provisions of circular letter LC 15/3 of the Commissariat aux Assurances (the Insurance Supervisory Authority in Luxembourg). We facilitate, promote, and support the development of ESG investment strategies through our life insurance or capitalisation contracts. In such role, we do not manage the underlying assets of the contracts, and therefore we refer to each respective partner (asset manager, or other) who works with us and has been pre-screened as per our Due Diligence process, ensuring that each investment and every partner meets all regulatory requirements.

Investment approach of WEALINS S.A. own funds

In line with our mother company, the Foyer Group, our approach to sustainability and investments is characterised by embedding sustainability risks considerations.

Regarding the UN Global Compact, we perform checks related to breaches of the following principles: Human rights, Labour, Environment and Anti-Corruption. We collect information regarding controversies of investee companies based on their intensity. The controversy intensity level is ranked from 1 (lowest intensity) to 5 (highest intensity). The controversy level specifies the negative intensity of company-related events on the environment or society, and risks to the company itself. For more information, we refer to the available documentation³.

WEALINS S.A. ESG Insurance offering on Belgian Market called 'WE- Impact'

Some of our clients are on the lookout for more rewarding investment options while being able to anticipate the basis for sustainable growth potential they can pass on as their legacy. Here is where the strategic importance of the sustainable value of our service offering. Sustainable development and the preservation of our planet are the most relevant investment options able to guarantee a sound investment choice and at the same time, allowing us to guide our clients toward impactful investment choices. Striving to find solutions to guarantee the preservation of our planet while ensuring the preservation of family wealth defines our mission and underpins our investment strategy. This approach to investments is reflected in our product [WE-Impact](#), a dedicated product we offer on the Belgian market since November 2022 and recognised as an **Article 8 product**⁴. WE-Impact received a double recognition of sustainable investment approach from two major players in Europe in the field of

¹ Attributed by the INDR (Institut National pour le Développement durable et la Responsabilité sociale des entreprises). The INDR was founded in 2007 by members of the *Union des Entreprises Luxembourgeoises* (UEL), the umbrella organisation of Luxembourg employers, with the visionary aim to promote corporate social responsibility (CSR). The INDR therefore serves as a gateway to all Luxembourgish companies that wish to contribute to sustainable development.

² The Responsibility Europe network aims to showcase companies and organisations that have achieved one of the best existing sustainable development and corporate social responsibility (SD/CSR) certifications and contribute to a sustainable future (<https://www.responsibility-europe.org/en/>).

³ https://www.capitalatwork.com/wp-content/uploads/2022/02/242592_CAW_Principal-adverse-impact-statement_december-2021_ENG.pdf

⁴ The EU's Sustainable Finance Disclosure Regulation (SFDR) defines three investment classifications: 1. Article 6 are financial products which do not integrate any kind of sustainability; 2. Article 8 are financial products which promotes, among other characteristics, environmental or social characteristics, or a combination of both, provided that the companies in which the investments are made follow good governance practice. 3. Article 9 products are "funds that have sustainable investment or a reduction in carbon emissions as their objective."

sustainable investment : [LuxFLAG](#) and [Towards Sustainability](#).

The LuxFLAG ESG Insurance label recognises the connection between the criteria we have selected and the UNSDGs and Towards Sustainability is the Belgian label awarded by Febelfin and which rewards transparency over sustainable investments.

WE-Impact is a Life Insurance product that supports the promotion of sustainable investments redirects capital flows towards these types of investments. The product launched in Belgium can be launched in other markets in the future as well. The sustainable character of the product is underpinned by its digital-only format and enhanced transparency, but it is mainly realised through its exclusive offer of funds with a sustainable characteristic⁵. The sustainability funds are funds that use environmental, social, and corporate governance (ESG) criteria to evaluate investments or assess their societal impact. They may pursue a sustainability-related theme or explicitly aim to create measurable social impact. The main goal of this latter category – also known as SRI or Sustainable Responsible Investing – is to produce a tangible social output. WEALINS S.A. is accompanied by an external and independent provider for the fund selection. The product offers a fund universe of minimum 40 funds. The criteria for selecting funds is a combination of sustainable, product and company requirements. The Sustainability criteria is linked to the specificities of the labels (Luxflag and Toward Sustainability).

Integration of Sustainability risks in Insurance Advice (Article 3 SFDR)

In our role as insurance advisor, we have devised an entirely digital approach, through which we capture the sustainability preferences of our clients. This approach is done through our e-Wealins platform and the methodology we have created internally to map out the sustainability profile of our clients with the investment products that we source through third parties.

Excerpt on our approach

In line with our responsibilities as a financial adviser, in accordance with the Insurance Distribution Directive (IDD) regulation 2021/1257 of 21 April 2021, WEALINS S.A. needs to take into consideration the sustainability preferences of our clients.

In order to take good note of these preferences and determine their impacts on investments, we devise a system that would allow us to seemingly define our clients' preferences according to their risk appetite and match those with predefined sustainability 'profiles'.

To this end we have drafted sustainability questions that enable an open exchange between clients and WEALINS SA in order to ensure our clients can make an informed choice on sustainability and help them establishing sustainability preferences (take into account principal adverse impacts on environmental and social matters, investment promotes environmental or social characteristics (article 8 SFDR), sustainable investment (article 9 SFDR), investment in line with Taxonomy Regulation (EU) 2020/852).

Each preference carries a particular weight which determines a match to meet a sustainability profile(s) (from 2 to 6) established by WEALINS SA.

Once those preferences have been established, the clients will be offered a set of specific products (external funds (UCITS, etc.) and/or internal collective, dedicated and/or specialised insurance funds), that perfectly match the combination of their sustainability profile. We make our selection sourcing the information from the EET (European ESG Template) made available by our partners (asset managers, or other).

Statement on due diligence policies with respect to Principal Adverse Impacts of investment decisions on sustainability factors (Article 4 SFDR)

WEALINS S.A. offers a range of unit-linked life insurance and capitalisation products whose financial risks are fully borne by the policyholders.

The investments underlying WEALINS S.A. products provide access to up to four different types of funds, depending on the product and the target market. These may be external (UCITS, etc.) and/or internal collective funds, dedicated and/or specialised insurance funds set up and managed in accordance with Luxembourg regulatory provisions, and in particular with the provisions of circular letter LC 15/3 of the Commissariat aux Assurances (Luxembourg insurance supervisory authority). Through these external and/or internal funds, policyholders of WEALINS S.A. products can invest in a large number of strategies and investment profiles, most often managed by external and independent financial managers and sometimes, when the regulatory provisions of the policyholders' countries of residence allow it, directly by the policyholders.

Investment decisions are thus taken by these external financial managers mandated by WEALINS S.A. in the case of internal collective or dedicated funds, or by the policyholders themselves, or at least with the confirmation of the policyholders, who may, if they so wish, seek investment advice. In all these cases, it is the responsibility of the independent investment managers appointed by WEALINS S.A., the investment advisors appointed by the policyholders or, if applicable, the policyholders themselves to integrate sustainability risks into their investment decisions and to assess the principal adverse impacts of their investment decisions on sustainability factors and investment returns.

For the same reasons, neither WEALINS S.A. as an insurer nor its life insurance or capitalisation products take into account the

⁵ WE-Impact funds can fall under article 8 and article 9, therefore meeting 'E' or 'S' characteristics or pursuing a sustainable investment objective.

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adverse impacts of investment decisions on sustainability factors. When active acting as an insurance distributor (direct sales), WEALINS S.A., considers adverse impacts of investment decisions on sustainability factors in the insurance advice it provides by ensuring that the policies and strategies of its third party funds are in line with its own sustainability considerations and Foyer investment policy. The fund list with the SFDR classification is available here : <https://wealins.com/funds-list/>

Principle Adverse Impacts Statement

WEALINS distributes unit-linked life insurance and capitalisation contracts, mainly through a network of insurance intermediaries (brokers, banks, family offices). These intermediaries are responsible for engaging in a relation with policyholders. They define the investment strategy and investment support(s) most suitable for each policyholder, considering the risk appetite, and sustainability preferences of every specific client.

It is in the phase of direct exchange and discussion with the client that the intermediary takes charge of considering sustainability risks and what they represent for the clients' projects, while taking into account the adverse impacts of investment decisions on sustainability factors as part of the insurance advice.

WEALINS' role in this value chain and where we can exert the maximum influence is in the selection of the right partners (Asset Managers, Intermediaries) through our Due Diligence process. In establishing the correct collaborative framework with partners that share our sustainable vision and mission, we play our part to contribute to the European sustainable finance plan.

As we articulate our responsible investment policy and define a strategy and key targets, we can define actions and ways in which we can establish minimum requirements around expectations on the way our partners engage with the assets they invest in. We have already started tracking PAIs (Principle Adverse Impacts) in order to facilitate our role going forward and hopefully will be able to successfully elaborate a more granular analysis soon. This will enable us to prepare a set of plans to offset potential negative impacts allowing us to consider and monitor potential adverse impacts in a more direct way in the foreseeable future.

Information on how the remuneration policy of WEALINS S.A. is consistent with the integration of sustainability risks (Article 5 SFDR)

WEALINS S.A. has established a remuneration policy in accordance with regulatory requirements that includes information on how this policy is consistent with the integration of sustainability risks. The remuneration policy of WEALINS S.A. is part of the overall remuneration policy of Foyer Group, to which WEALINS S.A. belongs, which is summarised in the document Sustainability Statement published on the Group's website.