

In the context of the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector ("SFDR"), Keytrade Bank wishes to provide the following information.

INFORMATION ON THE INTEGRATION OF SUSTAINABILITY RISKS INTO REMUNERATION POLICIES

Keytrade Bank is currently working on an approach aimed at the consistent and gradual integration of sustainability risks into its remuneration policy. The approaches to be adopted in this framework will make it possible to take sustainability risks into account in the appropriate processes, in compliance with sectoral legislation on remuneration policies.

STATEMENT ON THE NON-CONSIDERATION OF PRINCIPAL ADVERSE EFFECTS ON SUSTAINABILITY

Keytrade Bank has evaluated the practical implementation of its obligations to take into account the principal adverse impacts of investment decisions on sustainability factors pursuant to Article 4 of SFDR.

The principal adverse impacts of investment decisions on sustainability factors relate to environmental, social and human resources issues, respect for human rights and anti-corruption.

Due to the lack of data at the level of instruments, which are only expected in January 2023 (according to the timetable established by the regulator), Keytrade Bank is unable to take into account at this stage the principal adverse impacts of investment decisions on sustainability factors at both entity and product level.

It should be noted that Keytrade Bank is closely monitoring regulatory and market developments in order to take into account the principal adverse impacts as soon as the required information is available.

INFORMATION ON THE INTEGRATION OF SUSTAINABILITY RISKS IN INVESTMENT DECISIONS RELATED TO KEYPRIVATE

The portfolio of KEYPRIVATE is composed of trackers, not individual stocks, bonds or investment funds.

A tracker is an investment product that tracks the value of a benchmark index. There are trackers that follow the main stock market indices (CAC40, BEL20, etc.) and there are also trackers on commodity prices.

The KEYPRIVATE investment committee has selected 8 trackers in 4 different asset classes, composed of dozens, sometimes hundreds, of underlying assets.

At this stage, the managers of the selected products (trackers) do not consider the sustainability risks to be relevant.

Therefore, in view of the irrelevance of taking into account sustainability risks at the level of the products composing the KEYPRIVATE portfolio, it is not relevant for Keytrade Bank to integrate sustainability risks in the investment decisions of the KEYPRIVATE Investment Committee.