

BEL GROUP
SUSTAINABILITY-LINKED
FINANCING FRAMEWORK



July 2022



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1. Introduction

Bel Group (“Bel”, “the Group”) is a French **family-owned Agri-food company**, positioned as a **major player in the healthy fruit and dairy single-serving portion snacking**. Established in 1865, the Group produces and sells products in individual portions from dairy, fruit and plant-based ingredients. Its portfolio of **differentiated and internationally iconic brands includes** The Laughing Cow®, Kiri®, Babybel®, Boursin®, Nurishh®, Pom’Potes®, and GoGo squeeZ®, as well as some 20 local brands. The Group generates sales of €3.379 billion in 2021 (+2.3% organic growth vs. 2020).

The Group is **present in 120 countries** with **57 subsidiaries** and **29 production plants** across the world.

To deliver more than **20 billion portions per year**, the Group is relying on **5,100 suppliers** including **1,400 partner dairy producers**.

Bel’s ambition is to **have a positive impact on all its stakeholders, from farmers to consumers, while protecting the planet**. For this, the Group has defined its corporate mission: “**champion healthier and responsible food for all**”. Bel’s commitment is to improve the nutritional quality of its products, consistently strive for greater naturalness, and encourage good eating habits while reducing its greenhouse gas (GHG) emissions.

Bel’s ambition: Build a responsible and profitable company



The Group is convinced that **overall performance** should be measured by **both financial and non-financial indicators** and that these two dimensions feed off each other. In 2020, the **creation of a “Impact department” joining finance and CSR teams** underlined Bel’s decision to walk on these two equally important “legs”.

Beyond, Bel's ambition is endorsed by its **11,800 “activist” employees** and supported by its **corporate values “dare, care & commit”**.

Bel's commitments to its stakeholders



Bel's medium-term strategy is to continue to **extend its product**, with the ambition to have a 50/50 balanced portfolio between dairy and fruit & plant-based over the medium-term, and to **expand its global reach into new markets** (China, India, South Africa & Indonesia).

2. Bel Company Corporate Social Responsibility Strategy

Since 2003 and its commitment to join the **United Nations Global Compact initiative**, Corporate Social Responsibility (“CSR”) has been **fully embedded into Bel Group’s DNA**, with an ambition to **be both a responsible and profitable company**.

Since then, every year, in its “Communication On Progress” report¹, available on its website, Bel reviews the initiatives and progress made by the Group to contribute to the 10 principles of the UN Global Compact, such as human rights, international working standards, environmental protection and the fight against corruption.

In 2016, the Group structured its approach to **place CSR and shared value creation at the heart of its growth model**, by creating trusting, lasting and profitable relations for all players in its value chain. Faced with mounting climate and demographical challenges, and to meet the new expectations of its stakeholders, the Group has chosen to go even further in contributing to feeding tomorrow’s global population of 10 billion people, while preserving the planet’s resources.

In 2018, it began a **radical and voluntary transformation of its business model**, under which **profitability and responsibility are inseparable**. In 2019, leveraging the teachings from its materiality and risk analysis, Bel unveiled its new corporate identity “For All. For Good” and its five priority challenges:

1. Contribute to healthier food
2. Promote sustainable agriculture
3. Design responsible packaging
4. Fight climate change and reduce its environmental footprint
5. Improve the accessibility of its products

For **each of the 5 priority challenges**, the Group has identified quantified objectives to guide its actions as it works **toward its 2025 vision**.

More specifically on Climate change, Bel aims to make carbon reduction a driver of its performance and aligns itself with an ambitious **climate trajectory contributing to limit global warming to +1.5°C, validated by the Science Based Targets Initiative (SBTi) in March 2022**. The Group **reports annually on progress toward these goals** in its Annual Report² and Communication On Progress¹, both available on its website, which is **audited by an independent third-party organization**.

Bel’s CSR strategy implementation is above all made possible by the **commitment of all its “activists” employees**. The Group strives to create a fulfilling and motivating work environment for its employees so that each one can contribute to the CSR ambition.

To this end, the Group has deployed an **innovative and ambitious social model**, the **“Nurture” program**, a comprehensive human resources roadmap built on the following axes:

- ✓ Belonging
- ✓ Recognition
- ✓ Development
- ✓ Self-fulfilment
- ✓ Safety & Well-being
- ✓ Family Care

¹ <https://www.groupe-bel.com/wp-content/uploads/2021/07/cop-bel2021-va-interactif-v2.pdf>

² [Le Groupe Bel - Registration document \(groupe-bel.com\)](#)

Going further, Bel's conducted a **global employee survey** in 2021, **"Your Voice"**, allowing employees to express themselves, and managers to gather transparent feedbacks and establish action plans. The survey highlighted two important points: the **employees' high level of commitment** to Bel's mission "champion healthier and responsible food for all" (77%), and their **wish to contribute even more** concretely at their level.







Answering to this aspiration, the **"Actors for Good" programme**, built around three-pillars "*I know, I act, I'm an activist*", is designed to help Bel's employees to better understand the key challenges we are collectively facing with Climate change, and to **empower them to become proactive players in the Group's mission**.

In 2021, a first step has been marked with the **launch and deployment of the Climate Fresk**, an innovative, efficient and accessible tool to understand the **scientific bases underlying climate change**. More than 850 employees, including ex-Com and Board of Directors members, have participated in the collaborative workshops and more than 75 employees were trained to become *Climate Fresk facilitators*. Bel will roll out the workshops to **all its employees by 2023**.



United Nation Sustainable Development Goals (SDGs)

As a relevant player in the European Agri-food sector, Bel supports the Sustainable Development Goals (SDGs) of the United Nations and addresses 11 out of the 17 SDGs.

Focus Area	UN SDGs
A model creating value for all its stakeholders	
Contributing to healthier food	
Promoting sustainable agriculture	
Designing responsible packaging	
Fighting climate change and reducing its environmental footprint	
Improving the accessibility and affordability of its products	

2.1. PROMOTE HEALTHIER FOOD

Bel's mission to **“champion healthier and responsible food for all”** is the cornerstone of its business strategy. As an agri-food company, the Group is committed to offer safe healthy products while encouraging better eating habits, Bel believes this is not only a necessity, but also its responsibility.



The Research, Innovation and Development (RID) division is made up of 180 employees with a wide range of expertise and knowledge, located in France, Portugal, Japan and the United States.

Bel's **RID team creates tomorrow's healthy and responsible food offerings and experiences** on the dairy and fruit & plant-based markets, by:

- **Identifying and analysing medium and long-term macro trends** and monitoring the eating habits of each population thanks to data-driven insights. Data has become paramount to the decision-making process. It allows us to gain a better understanding of our consumers. It is also used to identify future growth opportunities for our brands
- **Exploring more sustainable ingredients** and their properties (such as cauliflowers, peas, hemp seeds, etc.) to renovate our recipes and imagine new products
- **Developing and testing prototypes** with consumers
- **Collaborating with a partner ecosystem** in order to broaden our approach and shorten the time to market of our innovations: such as universities, start-ups, SMEs, competitiveness clusters, industrial partners, academic and scientific players (e.g. the CEA, INRAE and the CNRS), and investment funds (e.g. Big Idea Ventures, CapAgro and C Ventures)

Offer products with optimal quality & safety

Bel is committed to **guarantee optimal food quality and safety** and prevent the risks identified at all stages of its value chain. It includes **strong audit and processes monitoring** aiming at:

- Performing strict upstream controls on raw materials and packaging
- Deploying strict procedures at production sites
- Ensuring product quality and safety during downstream transport through audits of the distribution chain and the implementation of a Good Storage and distribution Practices Charter
- A robust traceability system to prevent risks
- Protecting consumer health and safety, and building a relationship of trust

Improve the nutritional quality of its products

Bel aims at providing its 400 million consumers around the world with **products combining taste, nutrition, and quality ingredients** by:

- **Improving the nutritional composition of its products**, notably with the introduction in 2017 of a nutritional profiling system called “Bel Nutri+”, based on official nutrient intake recommendations and setting of daily values (FAO/WHO, EFSA, IOM³), scientific references on dietary practices and validated by scientific experts. – *72% of children's and family product portfolio meeting “Bel Nutri+” criteria in 2021 (vs. 60% in 2017 corresponding to 46% of the global portfolio)*

³ Sources : FAO, Milk and Dairy products in human nutrition, 2013, available here : [Milk and dairy products in human nutrition \(fao.org\)](#) ; WHO Technical Report Series 916, DIET, NUTRITION AND THE PREVENTION OF CHRONIC DISEASES, Report of a Joint WHO/FAO Expert Consultation, 2003. Available here : [WHO TRS 916.pdf](#), or here : Diet, nutrition and the prevention of chronic diseases : report of a joint WHO/FAO expert consultation, Geneva,

- Constantly **delivering products with simpler and shorter ingredient lists**, while preserving food safety as a priority. Aligned with consumer’s expectations of less additives and demand for “natural products”, Bel has been committed to an optimisation plan to reduce the number of additives in the products of its five core brands, with an acceleration since 2020. - *Significant launches have taken place, such as The Laughing Cow OE in Europe in 2021, the joint launch of TLC Dip & Crunch with only one additive for MEGA and WEST in 2018, the launch of Kiri O additive in Europe in 2020, and the reduction of additives in Successful Cubes in 2018*
- **Implementing 58 recipes renovations either for nutrition and/or naturalness in 2021**
- **Eliminating all artificial flavours and colours from the Group’s core brands** – *target achieved in 2021 – 50 recipes revamped over the past three years to achieve this goal*. The group maintains the ambition of no longer having artificial flavours or colouring. This commitment encompasses all core brand products for all targets (children, family, adults, general plant-based, essential affordable), on a compulsory basis.

Promote better eating habits and encouraging healthier lifestyles

Bel is **engaged to educate children and their families** along with employees, to shift their eating habits and lifestyles toward healthier practices. Specific actions have been implemented:

- **Toward Bel’s consumers: “Educanut” programs** in partnership with public health associations, governmental and non-governmental organizations (e.g. FAO, *Action Contre la Faim*, Senegalese Ministry of Education, etc.) to help children and their parents better understand that nutrition and physical activity are important for their health – *7 countries covered in 2021 with a target of 10 key countries by 2025 (vs. 4 in 2018)*
- **Toward Bel’s employees: “Healthy Smile” nutritional education programs** promoting a balanced diet and healthy lifestyle, encouraging physical activity and improving the food offering (distribution of educational tools, games, sports competitions, culinary contests, etc.) – *83% of Bel’s subsidiaries covered in 2021 with a target of 100% covered subsidiaries in 2025*

2.2. PROMOTE SUSTAINABLE AGRICULTURE

Bel’s priority for this segment of the value chain is to **promote virtuous agricultural practices that have a positive impact for humans, the environment** and, more globally, the **entire ecosystem** within which the Group operates.

Bel aims to encourage regenerative agricultural practices, which help fight and adapt to climate change, restore biodiversity and soil health, optimize the water cycle, support local dynamics and farm’s resilience.



Take actions for a sustainable upstream dairy

Milk is the basic ingredient for cheese making: Bel **collects over one billion liters of milk** each year from approximately **1,400 producers** or collection centres in its 9 dairy supply basins worldwide each year. Since 2012, Bel & WWF France have been working together to evaluate and **reduce the environmental impact of dairy cow feed**. In 2018, Bel & WWF France co-developed Bel’s Global Sustainable Upstream Dairy Charter⁴. The charter integrates economic, social and environmental aspects and covers all the Group’s dairy supply basins throughout the world with identified actions and goals for 2025 notably on sustainable production model, animal welfare, pasture grazing and environmental footprint.

Use plant-based raw materials within strict limits while continuing to ensure health safety and the great taste of its products

Aligned with the need to **diversify and balance animal/plant-sourced foods** to preserve resources, and with evolving consumer’s behaviours (flexitarian diet), Bel is committed to **complement its dairy products with more fruit & plant-based products**. The Group launched its first **hybrid** (such as The Laughing Cow

⁴ [Bel global-sustainable upstream dairy charter - 2018 \(groupe-bel.com\)](https://www.groupe-bel.com/en/global-sustainable-upstream-dairy-charter-2018)

Blends in the U.S., Germany, the U.K., Canada and Australia) or **100% plant-based products** (e.g. launch of Boursin Dairy Free in the US and Canada in 2020). Bel is also accelerating its transformation and launched Nurishh in 2021, its **first 100% plant-based brand**, and Babybel plant-based in 2022. Additionally, specific objectives were set:

- **100% of responsible vegetable fats sourcing**
- For **others plant-based ingredients**, a set of commitments have been defined to ensure a **responsible sourcing adapted to local context and practices**

Deliver the goodness of fruits

Bel is engaged in **sourcing sustainably its fruits** and **promote sustainable practices** that limit biodiversity loss by:

- **Encouraging sustainable agriculture to preserve biodiversity** (e.g. in France sourcing fresh apples from orchards that have obtained the “Vergers écoresponsables” endorsement, encouraging the use of biological control methods, etc.)
- **Tending its own orchards and developing trusting relationships with partner farmers** by favouring long-term contracts with farmers to secure procurements

2.3. DESIGN RESPONSIBLE PACKAGING



Portion is in the heart of Bel’s DNA. This packaging format gives many advantages in achieving Bel’s mission (food quality & safety, limiting excess consumption, offering right nutritional intakes, reducing food waste and enabling accessibility). Nonetheless, aware of the **environmental challenges posed by individual packaging**, the Group is striving to limit the environmental impacts of packaging through a responsible packaging policy⁵. This policy, implemented since 2018, has set its strategy and its five objectives for 2025:

- **Reduce and simplify the composition of packaging** by systematically following an eco-design process that takes end-of-life into account - *in France, in 2021, Bel deployed a bulk Babybel offer in more than 20 retail stores*
- **Prioritize** systematically **plant-based raw materials** - *2/3 of Bel’s packaging materials are cardboard and paper*
- Use **only paper and cardboard** materials made from **recycled fibres or certified/sustainably grown virgin fibres** - *95% of Bel’s paper/cardboard packaging is from certified origin or contained mostly recycled fibres in 2021*
- Aim for **100% eco-designed packaging** to be recyclable-ready or biodegradable - *95% of Bel’s packaging are already recyclable-ready in 2021⁶*
- Facilitate and **encourage sorting and recycling** by communicating to consumers how to recycle its products and by forging partnerships with other actors to develop packaging waste collection and recovery chains in all the countries where the Group operates – e.g. *CELAA⁷ in France, AREME⁸ in Belgium, COAALI⁹ in Spain to develop sorting system for small aluminium*

Bel is determined to go even further by 2030 by developing packaging concepts that are reusable, edible, biodegradable and more.

⁵ [Bel’s responsible packaging policy \(groupe-bel.com\)](https://www.groupe-bel.com)

⁶ Excluding subcontractors, MOM and wax which is not considered as a packaging in regulatory terms

⁷ *Club de l’Emballage Léger en Aluminium et en Acier (CELAA)* - [Qui sommes-nous ? - #ProjetMétal \(projetmetal.fr\)](https://www.projetmetal.fr)

⁸ *Association pour le Recyclage des Emballages légers et objets assimilés en Métal (AREME)*

⁹ *Coalicion por el Reciclaje del Aluminio y Acero Ligero (COAALI)*

2.4. FIGHT CLIMATE CHANGE AND REDUCE ITS ENVIRONMENT FOOTPRINT

Fighting climate change is a strategic priority for Bel that calls for lasting actions to transform the Group, such as reducing the carbon footprint of dairy, increasing the share of fruit and plant-based products in its product-mix and improving its energy mix.



The Group has been a **member of the SBTi since 2017**. Its **first target of greenhouse gas (GHG) emissions reduction was approved in 2019 aligned with the +2°C degrees' trajectory**. Convinced that the world is facing a real emergency regarding climate crisis, the Group decided to commit even further by joining the "Race To Zero" initiative in 2021 and defining new **targets aligned with the +1.5°C trajectory**. These ambitious targets were validated in March 2022 by the SBTi. These reduction goals **cover the Group's entire value chain**, from upstream agricultural activities to transportation and packaging.

On top of these reduction targets, the Group is committed to contribute to **carbon neutrality; first, for Scopes 1 and 2 by 2025, and then for the full value chain by 2050**.

A two-pronged strategy has been implemented to manage this ambition:

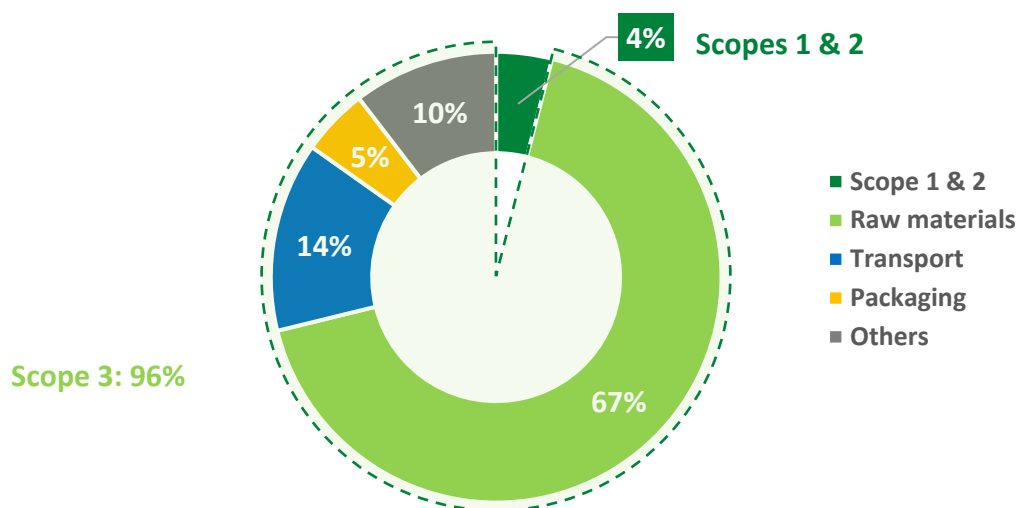
- 1) **Avoid carbon emissions**
- 2) **Reduce and enable its suppliers to reduce carbon emissions**

For the remaining **incompressible emissions**, the Group will **invest in carbon sink projects like planting forest or rehydrating peatlands** to sequesterate them. **As a first project, the Group joined the Livelihoods Carbon Fund 3 (LCF3) launched by Livelihoods Venture in June 2021**, alongside 13 companies and financial investors. Its aim is to support rural communities in their efforts to preserve or restore their natural ecosystems and improve their livelihoods through sustainable agricultural practices.

Fight climate change

Bel's global GHG emissions are estimated to amount to c. **5 million metric tons of CO₂e** and are **96% related to Scope 3 in 2020¹⁰**.

2020 Bel Group Scopes 1, 2 and 3 GHG emissions over the entire value-chain



¹⁰ Source: Bel's Universal Registration Document - [BEL URD2021 \(groupe-bel.com\)](https://www.groupe-bel.com/BEL-URD2021)

1) Avoid carbon emissions

The first action of the Group to fight against climate change, is by **avoiding GHG emissions** through action plan like committing to **zero deforestation** linked to the soy and palm meal used in dairy cow feed, the plant-based oils in some of its recipes, and the paper and cardboard in its packaging as stipulated both in the **Bel's global forest and natural ecosystem policy**¹¹ and the **Bel Biodiversity policy**¹² jointly developed with the WWF France.

This ambition to preserve natural ecosystems and fight deforestation through its supply chain is reflected in strong commitments to achieve **100% zero deforestation**¹³ by 2025 (vs. 44% in 2021) .

2) Reduce carbon emissions

As the production of **raw materials** accounts for **67% of the Group's carbon emissions**, Bel's is strongly committed on this segment. Within the framework of its **global "Sustainable Dairy Upstream" charter**¹⁴, built in partnership with the WWF France in 2018, the Group encourages farmers to limit the environmental impact of their activities and to promote sustainable practices. Bel's strategy to **develop the plant-based or hybrid products** (combining dairy and plant-based ingredients) is also an efficient way to reduce carbon emissions (e.g. Nurishh Classic Style Slices® products are emitting four time less GHG emissions than their dairy equivalent¹⁵).

On its industrial sites, Bel has set ambitious targets for **reducing energy consumption**, while developing the **use of renewable energy sources**.

Additionally, the Group is taking actions in the **upstream and downstream transport** of raw materials and finished products. By optimizing truck and container fill rates, as well as transportation flows,, Bel has been able to reduce by 3.6% transportation-related GHG emissions compared to 2017 level.

Beyond the manufacturing stage, Bel's is **addressing the entire lifecycle of products** by reducing the impact of packaging at all stages (design, production, recycling).

The Group is also committed to **use water more sustainably and fight food waste**, as described in the following sections.

Use water sustainably

Bel seeks to constantly reduce the water consumption required for its activities and to improve the quality of its discharges, through the use of efficient technologies. The Group has set **targets to address water and climate challenges** and guidelines to achieve them by:

- Implementing the Wasabel ("Water Saving at Bel") **program to reduce water consumption at production by 55% in 2025** (vs. 2008)
- **Reducing water consumption linked to agricultural production**

Fight food waste

For Bel, fighting food waste is a **critical issue in our society** and an **ethical and environmental** imperative, as a third of the food produced in the world is wasted. **Minimizing waste is an integral part of Bel's business model**, as it contributes to reduce GHG emissions. The Group has a comprehensive strategy to **fight food waste on the entire value chain from milk collection to final consumption and aims at reducing food waste by 50% by 2030** (e.g. 99.9% of Bel finished products commercialised or given to associations in 2021).

¹¹ [Bel's Global Forest and Natural Ecosystems Policy \(groupe-bel.com\)](https://groupe-bel.com)

¹² [Bel's Biodiversity Policy \(groupe-bel.com\)](https://groupe-bel.com)

¹³ Area at risk / total area required to produce the raw materials monitored

¹⁴ [Bel's Global Sustainable Upstream Dairy Charter \(groupe-bel.com\)](https://groupe-bel.com)

¹⁵ Life Cycle analysis (LCA) performed in 2021 by Quantis



As an example, in several countries (France, Belgium, Portugal, UK and Spain), Bel is working with its partner Too Good To Go to **raise consumers' awareness** of the Best Before date and to **prevent products** that are still good from **being thrown away**. This communication is made through a “Look, Smell, Taste, Don't Waste” pictogram.

2.5. IMPROVE THE ACCESSIBILITY OF ITS PRODUCTS



Bel aims at making **product accessibility and affordability one of its strategic priorities** by committing to offer quality products to as many consumers as possible everywhere in the world.

To do so, the Group addresses all components of the accessibility by:

Leveraging Bel's iconic brands to offer the right products to everyone's needs

- Individual portion based model **adapted to all eating consumption habits** (at home, on the go, etc...)
- Range of products and recipes **addressing the largest number of consumers** but tailored to the specific market needs
- Development of **plant-based or hybrid products** to meet **new consumer expectations** (such as flexitarian diet)
- **Democratise organic products**, launch of Babybel, The Laughing Cow & Kiri since 2018
- **Affordable and enriched products in certain regions** to contribute to a **better coverage of the nutritional requirements** (i.e. vitamin and mineral enrichment)

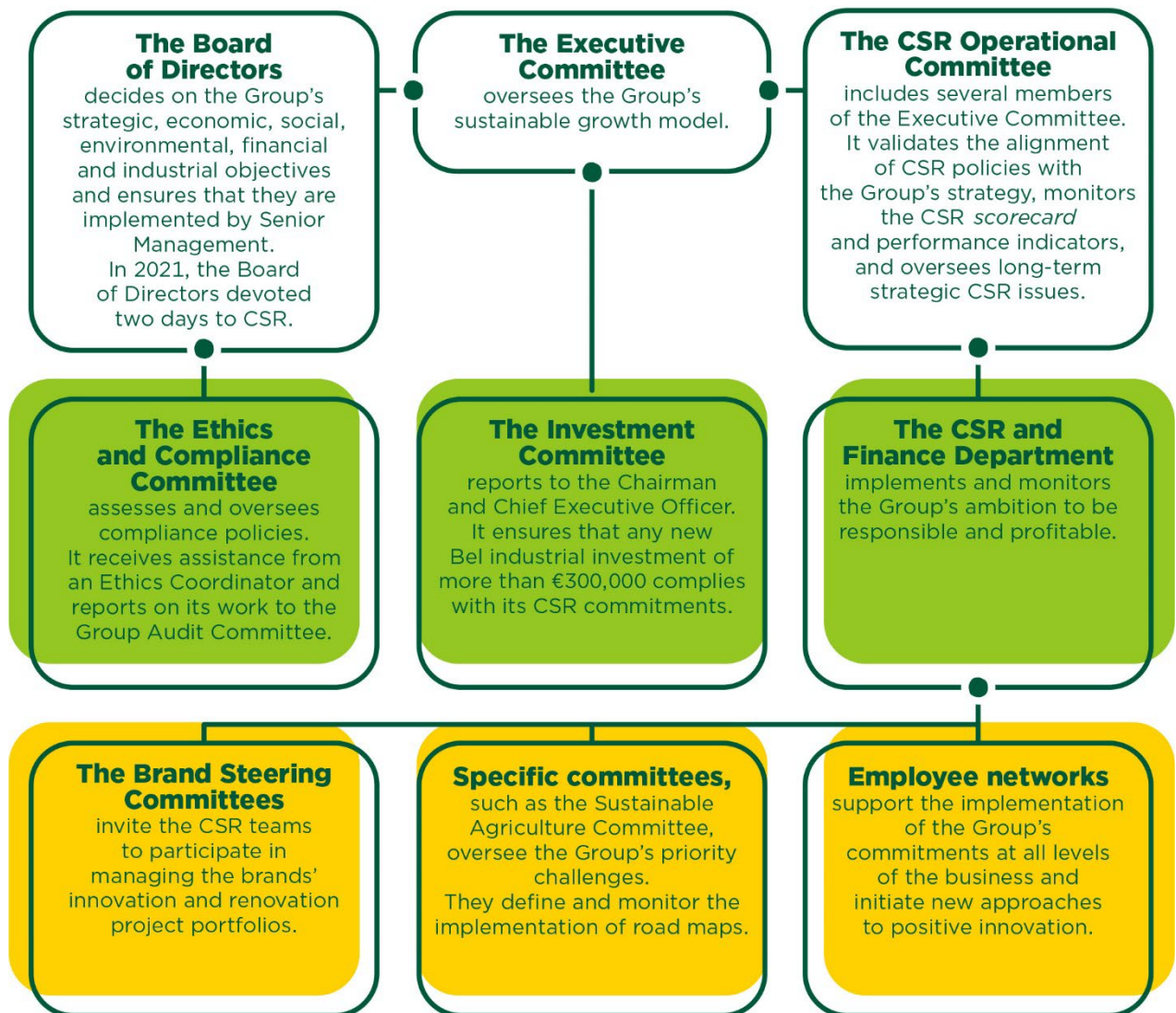
Developing innovative and inclusive distribution models

- “Sharing cities”, launched in 2013, a complementary distribution channel leveraging existing networks of **street vendors to sell its products** in five major cities in emerging countries (Ho Chi Minh City, Hanoi, Kinshasa, Mumbai and Antananarivo)
- “Inaya”, launched in 2019, a loyalty program opened to existing retailers, offering them **access to health insurance services** designed specifically for them and their families at preferred rates
- New **innovative distribution models** to adapt to new consumption modes:
 - **Partnerships with large players** (e.g. McDonald's® and Disneyland® Paris in France or Starbucks® in the United States)
 - Pilot of **bulk sales** with Babybel, allowing both to win over new consumers and reduce packaging

2.6. CSR GOVERNANCE

The Group's structure facilitates the consideration of CSR challenges from the top management to the operational employees.

A governance of ESG issues at all levels of the company



Additionally, and to support its ambition to “build a responsible and profitable company”, Bel has chosen **to deploy a carbon impact analysis tool at all levels of decision-making within the company**. Carbon footprint is **systematically measured** and progressively integrated into the Group decision processes **as accounting metrics**. It provides a consolidated, precise, and regular perspective of the Group's carbon footprint in all its markets, brands, segments, and products. In practice, the Group has already **put in place environmental and social impact assessment grids for all of the company's strategic decisions** and is also working to **define “carbon” budgets by end 2022** in the same way as financial budgets.

2.7. AWARDS



Awarded the **EcoVadis Platinum Medal rating** (the highest level under EcoVadis) **with a score of 79/100**, in recognition of its CSR performances. This award places them in the top 1% of the highest rated companies in the world, in its sector (manufacture of dairy products).



**United Nations
Global Compact**

Awarded **best CSR communication¹⁶ in the Global Compact advanced category**, the highest level under the United Nations Global Compact (years 2015 and 2018)



Silver prize 2021 - "Grand Prix de la Good Economie"¹⁷ in the Responsible and ethical organization category for its governance combining Finance & CSR



In 2021, Bel's scored **93/100 on the French Gender equality index**, a result outlining the Group's gender equality projects and its commitment to the United Nations Sustainable Development Goals, particularly on Goal 5 on gender equality.



Digital Finance Awards - Winner of the Innovation award and the award of the 2022 Year

Sirius award in 2022 - thanks to our collaboration with other food manufacturers and retailers to promote healthier baskets, within the Coalition of Consumer Goods Forum "collaborating for healthier lives".

¹⁶ [Bel again recognized for its CSR communication by the United Nations Global Compact \(groupe-bel.com\)](https://www.groupe-bel.com)

¹⁷ [Palmarès de la "Good Economie"](#)

3. Sustainability-linked financing Framework

By establishing this Sustainability-Linked Financing Framework (the “Framework”), Bel aims to **reinforce its commitments to sustainability**, and explicitly commits to address relevant, core and material sustainability issues.

The **Framework aims at covering debt instruments such as bonds, schuldschein, loans & facilities, and any other financing instruments** whose characteristics are **linked to sustainability performance targets** (together the “Sustainability-Linked Financing Instruments”).

The economic terms of Sustainability-Linked Financing Instruments can vary depending on whether the issuer achieves predefined sustainability performance targets, defined in section 3.2. Unless otherwise stated, the proceeds of such Sustainability-Linked Financing Instruments are intended to be used for general corporate purposes.


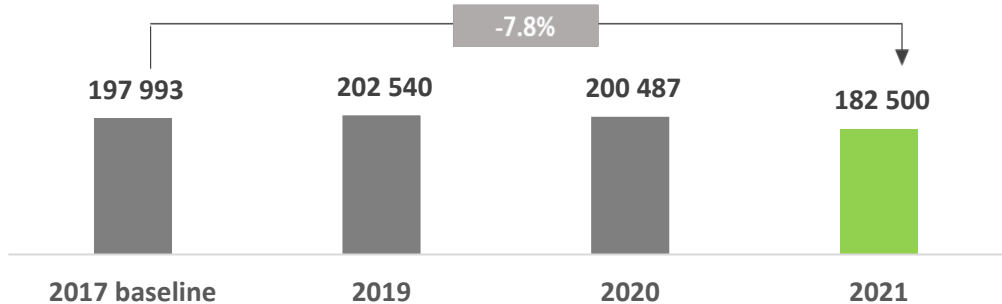
This Framework has been established in accordance with the Sustainability-Linked Bond Principles 2020 (“SLBP 2020”)¹⁸ as administered by the ICMA and the **Sustainability-Linked Loan Principles 2022** (“SLLP 2022”)¹⁹ as administered by the LMA, and their five core components:

- 1) Selection of Key Performance Indicators (KPIs)
- 2) Calibration of Sustainability Performance Targets (SPTs)
- 3) Financing characteristics
- 4) Reporting
- 5) Verification

¹⁸ ICMA SLBP 2020: [Sustainability-Linked-Bond-Principles-June-2020](#)

¹⁹ LMA SLLP 2021: [Sustainability-Linked Loan Principles 31 March 2022](#)


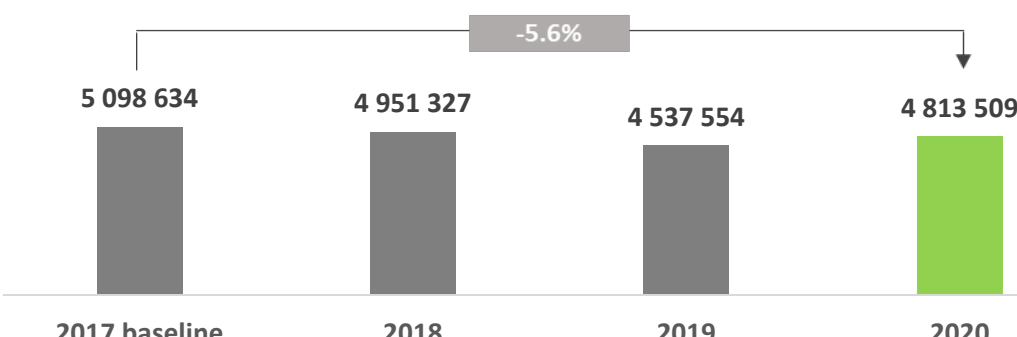
3.1. SELECTION OF KEY PERFORMANCE INDICATOR (KPI)

KPI #1	Absolute Scopes 1 and 2 GHG emissions										
Definition	 <p>Bel's carbon footprint emissions have been calculated in accordance with the Greenhouse Gas Protocol²⁰ guidelines.</p> <ul style="list-style-type: none"> • Scope 1: direct emissions from burning the fossil fuels (oil, gas and coal) used in the Group's plants or generated by refrigerant leaks from facilities; this scope includes emissions from vehicles owned or controlled by the Group • Scope 2: indirect emissions associated with the purchased production of electricity, heat and refrigeration 										
Alignment to the UN SDGs	Contributes to UN SDG 13 -Climate Action- and UN SDG 7 -Affordable & Clean Energy-										
Alignment to the objectives defined by the EU Taxonomy Reg.	Objective 1: Climate Change Mitigation										
Perimeter	Bel's Scopes 1 and 2 carbon footprint assessment encompasses all Group's operational units (corporate offices, plants, transport) controlled by the Group ^{21,22}										
Rationale	<p>In 2021, the Group decided to accelerate the reduction of its carbon footprint and adopted a +1.5°C trajectory, validated by the SBTi in March 2022. Bel commits to reduce absolute GHG emissions on Scopes 1 & 2 by 75.6% by 2035 from a 2017 base year.</p> <p>To help meet this goal, the Group aims at reducing its GHG emissions as much as possible through a two-pronged approach:</p> <ol style="list-style-type: none"> 1) reduce the energy footprint of industrial sites: ESABEL ("Energy Saving at Bel") program enabling production sites to monitor their consumptions levels, to define and put in place roadmaps to reduce them (e.g. energy recovery using heat pumps) 2) increase the use of renewable energy (biomass boiler, Photovoltaic panels, etc.) <p>With this approach, the Group was already able, between 2017 and 2021, to reduce by 8% the GHG emissions and in 2021 67% of the electricity of the Group is from a renewable sourcing.</p>										
Historical data	<p style="text-align: center;">Historical evolution of KPI#1: Evolution of Scopes 1 and 2 absolute GHG emissions (in tons CO₂ equivalent)</p>  <table border="1"> <thead> <tr> <th>Year</th> <th>GHG Emissions (tons CO₂ equivalent)</th> </tr> </thead> <tbody> <tr> <td>2017 baseline</td> <td>197 993</td> </tr> <tr> <td>2019</td> <td>202 540</td> </tr> <tr> <td>2020</td> <td>200 487</td> </tr> <tr> <td>2021</td> <td>182 500</td> </tr> </tbody> </table>	Year	GHG Emissions (tons CO ₂ equivalent)	2017 baseline	197 993	2019	202 540	2020	200 487	2021	182 500
Year	GHG Emissions (tons CO ₂ equivalent)										
2017 baseline	197 993										
2019	202 540										
2020	200 487										
2021	182 500										
Reporting	Annual reporting, independently assured by the Group's external auditors										

²⁰ <http://ghgprotocol.org/>

²¹ Perimeter is aligned each year with the rules defined in BEL's Annual Report Methodological Note – cf. Methodological note in section Corporate Social Responsibility

²² Aligned with GHG protocol methodology, Bel will recalculate its perimeter and baseline in case of any significant structural change occurs (cession or acquisition)

KPI #2	Scope 3 GHG emissions										
KPI #2a	Absolute Scope 3 GHG emissions										
Definition	 <p>Bel's absolute carbon footprint emissions have been calculated in accordance with the Greenhouse Gas Protocol²³ guidelines.</p> <ul style="list-style-type: none"> • Scope 3: other indirect emissions, in particular raw material purchases, finished product packaging and upstream and downstream transport. 										
Alignment to the UN SDGs	Contributes to UN SDG 13 -Climate Action- and UN SDG 7 -Affordable & Clean Energy-										
Alignment to the objectives defined by the EU Taxonomy Reg.	Objective 1: Climate Change Mitigation										
Perimeter	Bel's scope 3 carbon footprint assessment encompasses all Group's indirect emissions including from upstream and downstream activities ^{24,25}										
Rationale	<p>At year-end 2020, 4 813 509 tons of CO₂ or 96% of Bel global carbon emissions are related to the Scope 3. At scope 3 level, close to 67% are related to raw material purchasing and 14% from upstream and downstream transport.</p> <p>Given the materiality of the raw material scope, Bel is committed to encourage producers to limit the environmental impact of their activities and to promote sustainable practices, notably through the "Sustainable Dairy Upstream" charter. Additionally, the acceleration of the Group's positioning in the fruit and vegetable segment, which has a lower carbon impact, will contribute to reduce its emissions.</p> <p>The Group also optimises the transport processes of its raw materials and finished products to reduce its GHG emissions. The layout of its sites and its logistics flows make it possible to reduce the distances upstream (mostly milk) and downstream (as close as possible to the consumer markets).</p>										
Historical data	<p style="text-align: center;">Historical evolution of KPI#2a: evolution of Scope 3 absolute GHG emissions (in tons CO₂ equivalent)</p>  <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Year</th> <th>GHG Emissions (tons CO₂ equivalent)</th> </tr> </thead> <tbody> <tr> <td>2017 baseline</td> <td>5 098 634</td> </tr> <tr> <td>2018</td> <td>4 951 327</td> </tr> <tr> <td>2019</td> <td>4 537 554</td> </tr> <tr> <td>2020</td> <td>4 813 509</td> </tr> </tbody> </table> <p><i>NB: 2019 was an atypical year mainly due to emission factors adjustments on carbon dairy raw material (updated in 2020 with more accuracy)</i></p>	Year	GHG Emissions (tons CO ₂ equivalent)	2017 baseline	5 098 634	2018	4 951 327	2019	4 537 554	2020	4 813 509
Year	GHG Emissions (tons CO ₂ equivalent)										
2017 baseline	5 098 634										
2018	4 951 327										
2019	4 537 554										
2020	4 813 509										
Reporting	Annual reporting, independently assured by the Group's external auditors										

²³ <http://ghgprotocol.org/>

²⁴ Perimeter is aligned each year with the rules defined in BEL's Annual Report Methodological Note – cf. Methodological note in section Corporate Social Responsibility

²⁵ Aligned with GHG protocol methodology, Bel will recalculate its perimeter and baseline in case of any significant structural change occurs (cession or acquisition)

KPI #2b	Carbon diagnosis of dairy farms												
Definition	<p>Carbon diagnosis of dairy farms is defined as the share of supplying dairy farms with a carbon diagnosis over the total of Bel's supplying dairy farms.</p> <p>Supplying dairy farms carbon diagnosis refers to a comprehensive evaluation process which aims to collect and analyse supplying dairy farms' data on Carbon emissions (inventory of animals, feed purchased, crop rotation, fertilisation practices, etc.).</p> <p>CAP'2ER[®] In France and in the US, local tools that measure farms' carbon impact exist and are used, respectively called Cap'2ER and Farm Environmental Stewardship. Expert technicians collect farms' data and work with Bel to consolidate it at Group level.</p> <p>FARM In countries where a local tool does not exist, the Group resorts to the Cool Farm tool (created in 2010) developed by the Cool Farm Alliance. Assessments can either be performed by Bel's technicians, which is the case in Portugal mainland and Azores, Iran and Morocco, or by external parties, which is the case in Poland and Slovakia. In Canada, the local cooperative, the PLQ, is actually developing its own carbon strategy and tool.</p> <p>CFA COOL FARM ALLIANCE</p>												
Alignment to the UN SDGs	Contributes to UN SDG 13 -Climate Action-												
Alignment to the objectives defined by the EU Taxonomy Reg.	Objective 1: Climate Change Mitigation												
Perimeter	1,400 producers or collection centres ²⁶												
Rationale	<p>Bel collects more than one billion litres of milk per year from approximately 1,400 producers or collection centres over 9 dairy supply basins (France, Portugal, Azores, Poland, Slovakia, Morocco, Iran, USA, Canada). Supplying dairy farms can be direct producers, associations of producers or co-operatives based in countries where the Group manufactures its cheese from liquid milk (e.g. the US, France, Portugal, Slovakia, amongst others). At year-end 2020, 52% of Bel's raw material emissions are related to the supply of milk. The goal of the carbon audits is to identify the main sources of emissions for each farm (enteric fermentation, feed production, manure & grazing management, and energy use) so that a specific and tailored action plan can be put into place to reduce those emissions. These tailored action plans are co-constructed by both the farmer and the technician and are aiming at reinforcing the producer resilience. A second diagnosis is expected to be completed three to five years after the first one, to measure the progress made.</p>												
Historical data	<p style="text-align: center;">Historical evolution of KPI #2b: evolution of the share of supplying dairy farms with carbon diagnosis</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Year</th> <th>Share with a carbon diagnosis</th> <th>Share with a second diagnosis</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>18%</td> <td>0%</td> </tr> <tr> <td>2020</td> <td>56%</td> <td>0%</td> </tr> <tr> <td>2021</td> <td>64%</td> <td>0%</td> </tr> </tbody> </table>	Year	Share with a carbon diagnosis	Share with a second diagnosis	2019	18%	0%	2020	56%	0%	2021	64%	0%
Year	Share with a carbon diagnosis	Share with a second diagnosis											
2019	18%	0%											
2020	56%	0%											
2021	64%	0%											
Reporting	Annual reporting, independently assured by the Group's external auditors since 2020												

²⁶ Perimeter is aligned each year with the rules defined in BEL's Annual Report Methodological Note – cf. Methodological note in section Corporate Social Responsibility

KPI #3	Nutrition score										
Definition	<p>Nutrition score is defined as the number of products in the <i>Children & Family</i> portfolio aligned with Bel’s internal nutritional scoring system Nutri+.</p> <p>Bel has been deploying since 2017 the Bel Nutri+ score, based on the nutritional recommendations of the World Health Organization (WHO). This system aims to structure Bel’s nutritional approach for product development by setting thresholds per product category (cheese, milk, yogurt, salty snacks, sweet snacks) and per target (adults, children) for six nutrients:</p> <ul style="list-style-type: none"> • nutrients to be favoured: calcium, proteins; • nutrients to be limited: fat, saturated fatty acids, added sugars, salt. 										
Alignment to the UN SDGs	Contributes to UN SDG 2 -No hunger and reducing malnutrition in all its forms-, UN SDG 3 -Good Health & Well-being- and SDG 12 -Responsible consumption and production-										
Alignment to the objectives defined by the EU Taxonomy Reg.	Not Applicable										
Perimeter	Bel Nutri+ scoring applies to products in the Children & Family portfolio (Kiri, The Laughing Cow, Babybel, Nurishh), worldwide ²⁷										
Rationale	<p>The nutritional quality of food is a growing concern for public health authorities and consumers alike, while problems of overweight and obesity affect a large number of adults and children throughout the world. The <i>World Health Organization (WHO)</i> has identified actions that the food industry can take to improve population nutrition and create healthier food environments²⁸, such as:</p> <ul style="list-style-type: none"> • reformulating products to reduce nutrients of concern, • ensuring that healthy and nutritious choices are available to all consumers <p>Bel is determined to tackle this ambitious challenge. Corroborating this ambition, a study led by Informas, an international network which assessed commitments and targets of food manufacturers²⁹, attributed Bel the highest ranking for “Corporate population nutrition strategy” in France.</p>										
Historical data	<p style="text-align: center;">Historical evolution of KPI#3: share of Nutri+ aligned products in the Children & Family portfolio</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Share of Nutri+ aligned products</th> </tr> </thead> <tbody> <tr> <td>2017</td> <td>60%</td> </tr> <tr> <td>2019</td> <td>69%</td> </tr> <tr> <td>2020</td> <td>72%</td> </tr> <tr> <td>2021</td> <td>72%</td> </tr> </tbody> </table>	Year	Share of Nutri+ aligned products	2017	60%	2019	69%	2020	72%	2021	72%
Year	Share of Nutri+ aligned products										
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2019	69%										
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2021	72%										
Reporting	Annual reporting, independently assured by the Group’s external auditors										

²⁷ Perimeter is aligned each year with the rules defined in BEL’s Annual Report Methodological Note – cf. Methodological note in section Corporate Social Responsibility

²⁸ World Health Organization. Global Strategy on Diet, Physical activity and Health, 2004

²⁹ [“Food companies’ commitments and practices on food environments and population nutrition in France”](#)

3.2. CALIBRATION OF THE SUSTAINABLE PERFORMANCE TARGET (SPT)

SPT #1	Reduction of absolute Scopes 1 and 2 GHG emissions
SPT	Bel is committed to reduce its Scopes 1 and 2 emissions by 75.6% by 2035 from a 2017 base year.
Target observation date	<p>To achieve this commitment, intermediate targets are set as follows from a 2017 base year – <i>Carbon reduction trajectories should not be seen as linear:</i></p> <p>Target observation date December 2026:</p> <ul style="list-style-type: none"> Objective 2026: -26.5% to 145 558 tons CO₂ equivalent³⁰ Publication in the Annual Report as of December 2026 <p>Target observation date December 2028:</p> <ul style="list-style-type: none"> Objective 2028: -35.7% to 127 363 tons CO₂ equivalent³¹ Publication in the Annual Report as of December 2028 <p>Target observation date December 2035:</p> <ul style="list-style-type: none"> Objective 2035: -75.6% to 48 310 tons CO₂ equivalent³² Publication in the Annual Report as of December 2035
Base year	2017
Base line	197 993 tons CO ₂ equivalent
Means to achieve SPTs	<p>Bel is deploying various reduction measures to tackle the sources of Scopes 1 & 2 GHG emissions, including, but not limited to:</p> <ul style="list-style-type: none"> Reduce energy consumptions and improve energy efficiency, by investing in production sites to reduce their environmental footprint. The ESABEL programme allows each site to access a compendium of good practices, monitor its consumption levels and define action plans to reduce them. A clear 5-year roadmap has been defined in Q1 2022 based on the experiments and assessment of the carbon reduction enabled by known technologies and on Bel's ability to invest on specific levers. For example, the heat pump technology (fatal heat recovery) deployment with 3 heat pumps in installation/start up and operational by the end of 2022, a technology that will be deployed in all Bel's plant where it's feasible Further increase the use of renewable energy and grow its share within Bel's energy-mix (67% of electricity from renewable sources in 2021). In 2021, Bel has two biomass boilers that account for 14% of its energy) consumption for heating purposes, and three new projects are under way in Morocco, France and Portugal. Biomass technology has an important potential of carbon reduction and will be deployed as much as possible among other technology such as solar panel or purchasing of renewable electricity (PPA/ GPA)

³⁰ Estimated value at date of Framework publication

³¹ *Ibid.*

³² *Ibid.*

SPT #2

Scope 3 GHG emissions

SPT #2a	Reduction of absolute Scope 3 GHG emissions
SPT	Bel commits to reduce absolute Scope 3 GHG emissions 25% by 2035 from a 2017 base year.
Target observation date	<p>To achieve this commitment, intermediate targets are set as follows from a 2017 base year - <i>Carbon reduction trajectories should not be seen as linear:</i></p> <p>Target observation date December 2028:</p> <ul style="list-style-type: none"> • Objective 2027: -8.0% to 4 693 260 tons CO₂ equivalent³³ • Publication in Annual Report as of December 2028 <p>Target observation date December 2030:</p> <ul style="list-style-type: none"> • Objective 2029: -12.9% to 4 439 755 tons CO₂ equivalent³⁴ • Publication in Annual Report as of December 2030 <p>Target observation date December 2036:</p> <ul style="list-style-type: none"> • Objective 2035: -25.0% to 3 823 976 tons CO₂ equivalent³⁵ <p>Publication in Annual Report as of December 2036</p>
Base year	2017
Base line	5 098 634 tons of CO ₂ equivalent
Means to achieve SPTs	<p>Bel is deploying various reduction measures to tackle the sources of Scope 3 GHG emissions, including, but not limited to:</p> <ul style="list-style-type: none"> • Avoid GHG emissions through stopping deforestation linked to the soy and palm meal used in dairy cow feed, the plant-based oils in some of our recipes, and the paper and cardboard in its packaging • Reduce indirect emissions from farm to fork starting with: <ul style="list-style-type: none"> – Raw materials especially dairy upstream (c. 67% of global emissions) through low carbon practices such as developing free grazing, regenerative farming practices, reducing enteric emissions via feed supplements – Accelerating the development of plant-based raw materials – Transport (second biggest impact) through levers like increasing fill rate of the trucks, optimizing product density, or using Biodiesel and non-fossil origin fuel – Reinventing its packaging into more responsible packaging by adopting an eco-conception approach with levers like switching aluminium and plastic with plant-based material, or minimizing headspace

³³ Estimated value at date of Framework publication

³⁴ *Ibid.*

³⁵ *Ibid.*

SPT #2b	Carbon diagnosis: share of dairy farms with carbon diagnosis
SPT	Bel commits to have, by 2028, 90% of dairy farms carbon-diagnosed at least once and 80% of dairy farms carbon-diagnosed twice. In addition, Bel tends to have 100% of farms covered by a first diagnosis by 2030, and 100% by a second diagnosis by 2032.
Target observation date	<p>To achieve this commitment, intermediate targets are set as follows:</p> <p>Target observation date December 2026:</p> <ul style="list-style-type: none"> • Objective 2026: 85% of farms carbon-diagnosed at least once / 60% of farms carbon-diagnosed twice • Publication in Annual Report as of December 2026 <p>Target observation date December 2028:</p> <ul style="list-style-type: none"> • Objective 2028: 90% of farms carbon-diagnosed at least once / 80% of farms carbon-diagnosed twice • Publication in Annual Report as of December 2028
Means to achieve SPTs	<p>Bel is deploying different measures to reach this goal:</p> <ul style="list-style-type: none"> • Bel technicians or local external third party are trained to perform diagnostic and develop action plans • Generic tools are developed by headquarters team to support local team to put in place low carbon practices at farm level • Carbon diagnostic realization may be part of local milk team bonus, as in France and Portugal • Farmers are sensitized to environmental issues so as to stress their impact and how the resilience of their farms can be improved • After the first diagnosis, a second diagnosis is expected to be completed three to five years after the first one, to measure the progress made. <p>Additionally, this carbon diagnosis policy, by enabling to establish the baseline for GHG at Dairy farms level will be a key contributor of Bel's scope 3 reduction ambition. It will also allow Bel to implement, in coordination with each farmer, tailored GHG reduction plans. Results of these plans will be subsequently measured through a second diagnosis (three to five years after the initial one).</p>

SPT #3	Nutrition score: share of the Children & Family portfolio products aligned with Nutri+ nutrition scoring
SPT	Bel is committed to reach, by 2028, 83% of Nutri+ aligned products in the Children & Family portfolio, which corresponds to more than 60% of the global portfolio.
Target observation date	<p>To achieve this commitment, intermediate targets are set as follow:</p> <p>Target observation date December 2026:</p> <ul style="list-style-type: none"> • Objective 2026: 81% • Publication in Annual Report as of December 2026 <p>Target observation date December 2028:</p> <ul style="list-style-type: none"> • Objective 2028: 83% • Publication in Annual Report as of December 2028
Means to achieve SPTs	<p>To reach this ambitious target from the 2017 starting point (60% of the products in the Children & Family portfolio or 46% of the global portfolio aligned with Nutri+ nutrition scoring), various product development initiatives are taken by the Group, such as:</p> <ul style="list-style-type: none"> • changing existing recipes by: <ul style="list-style-type: none"> – favouring calcium and proteins; – limiting fat, saturated fatty acids, added sugars, and salt. • Make plant-based products compliant with Nutri+: <ul style="list-style-type: none"> – strengthen and expand Nurishh, the Group's first veggie brand, which currently offers a range of 11 products distributed in 17 countries – accelerate hybrid or purely plant-based innovations on several core brands

3.3. FINANCING CHARACTERISTICS

The proceeds of Bel Group's sustainability-linked financings will be used for general corporate purposes, including for the potential refinancing of existing debts as may be specified in the terms and conditions of the particular issuance.

The financial characteristics of the instrument (bond, loan, etc.) will be impacted by a step-up coupon, or a premium payment, or margin adjustment depending on the nature of the instrument according to the achievement or non-achievement of the selected KPIs and applicable SPTs at the Target Observation Dates, as specified in the relevant instrument specific documentation as applicable. Certain Sustainability-Linked instruments (such as Sustainability-Linked loans) might include also step-down margin applicable in case the relevant SPTs are timely reached by Bel.

Although this Framework defines several KPIs and SPTs, the choice of KPI(s) and SPT(s) for a given transaction will be specified in the relevant documentation. However, Bel commits to always use KPI #1 in conjunction with either KPI #2a or KPI #2b and that KPI #2b will always be used in combination with at least one other KPI.

- KPI #1 and KPI #2b will be used for any financing instrument whose maturity and/or characteristics are not eligible for a target observation date as of 31 December 2028
- KPI #1 and KPI #2a will be used for any financing instrument whose maturity and/or characteristics are eligible for a target observation date as of 31 December 2028 or later

In addition, in the case that the KPI does not achieve the respective SPT, a so-called Trigger Event will occur, which will result in an impact on the financial performance of the instrument. The implications on the financial performance of the Sustainability-Linked Instruments in case of a Trigger Event can occur in the following variations:

- The KPI-Step-Up Margin applicable to the rate of interest for the following interest periods
- One-time KPI-Premium Payment to investors on the redemption date

3.4. REPORTING

Bel Group commits to make publicly available the performance of the KPIs, at least annually within its Annual Financial Report³⁶, or within any other document on the Sustainability Performance of Bel, until all Sustainability-linked instruments have matured. In either case within 120 calendar days of the end of each calendar year to enable investors to monitor Bel's progress against the relevant KPIs and SPTs.

The disclosed information will entail:

- The up-to-date performance of the SPT on the KPI for the reporting period. The report will also include calculation methodology and baseline;
- The impact on the coupon adjustment amount or premium payment (if any) as well as the calculation methodology used;
- Any significant impact on Bel's sustainability strategy or any recent announcements, strategic decisions and funds mobilized that could affect the achievement of any of the SPTs targeted;
- Any re-assessments of SPTs due to any changes to the calculation methodology for a SPT or any adjustments of scope, if relevant. Bel's Annual Financial Report will be available on its website.

³⁶ Annual Financial Report issued pursuant to Article L.451-1-2 I and II of the French Monetary and Financial Code

3.5. EXTERNAL VERIFICATION

1) External verification of the Framework

Bel Group has appointed Moody's ESG to provide an independent Second Party Opinion report ("SPO") on the evaluation of this Framework and its alignment with the SLBP³⁷ and the SLLP³⁸. The SPO will be made publicly available on Bel's corporate website.

2) External verification of the Annual Reporting

An annual verification assurance report conducted by an independent external auditor will be made available to provide assurance on Bel's performance of the KPI.

3) External verification as of Target Observation Date(s)

A verification assurance report by an independent external auditor outlining the performance against the SPT will be provided and made publicly available for the relevant Target Observation Date.

4. Recalculation policy

The KPI(s) and/or the SPT(s) may be recalculated in good faith by Bel to reflect any significant change in:

- (i) the methodology of any KPI to reflect changes in the market practice or the relevant market standards,
- (ii) a regulation which is relevant to the determination of any KPI,
- (iii) the data due to better data accessibility, or
- (iv) the perimeter of the Group as a result of any acquisition, divestiture or disposal,

where any such change, taken individually or in aggregate, has a significant net impact on the levels of the SPT(s) and/or KPI(s).

Such recalculation may be performed provided that:

- (a) in the opinion of Bel, such change has no significant adverse effect on the interests of the bondholders or lenders, and
- (b) an External Verifier has independently confirmed that the proposed revision:
 - (i) is consistent with Bel's sustainable strategy; and
 - (ii) is in line with the initial level of ambition of the SPT(s),

Any such change will be communicated and notified as soon as reasonably practicable by Bel in accordance with the conditions detailed in the specific documentation of each Sustainability Linked Financing Instrument.

5. Amendments to this Framework

Bel may review this Framework from time to time to reflect any evolution of its Corporate Social Responsibility strategy. Bel will also review this Framework in case of any major update from section 3, such review will be subject to the prior approval of a qualified provider of a Second Party Opinion.

The updated Framework, if any, will be published on Bel's website and will replace this Framework.

³⁷ ICMA SLBP 2020: [Sustainability-Linked-Bond-Principles-June-2020](#)

³⁸ LMA SLLP 2022: [Sustainability-Linked Loan Principles 31 March 2022](#)

6. Disclaimer

This Sustainability-Linked Financing Framework (the “Framework”) does not constitute or form part of and should not be construed as any offer or invitation to sell or issue, or any solicitation of any offer to purchase or subscribe for, any securities of Bel SA (“Bel”) or any subsidiary or affiliate of Bel in any jurisdiction or an inducement to enter into investment activity nor should it or any part of it, or the fact of its distribution, form the basis of, or be relied on in connection with, any purchase, sale or subscription for any securities of Bel or any subsidiary or affiliate of Bel or be relied on in connection with any contract or commitment or investment decision whatsoever. Neither the Framework nor any other related material may be distributed or published in any jurisdiction in which it is unlawful to do so, except under circumstances that will result in compliance with any applicable laws and regulations. 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