



# GREEN RETAIL BOND

2023

# ALLOCATION & IMPACT REPORT

December 2024

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## 1. Introduction

As a network operator for electricity and gas, Fluvius is an indispensable partner in the energy transition in Flanders. In many Flemish municipalities, the adaptation of the infrastructure for managing the water cycle to the changed climate conditions is also not possible without the active contribution of Fluvius as manager of the local sewerage network. The latest Flemish coalition agreement (2024-2029) indicates this unequivocally: *"Fluvius is a crucial partner of the Flemish government to make the energy transition a reality. Energy networks are a strategic asset."*

Fluvius has clearly chosen to put sustainability in the broad sense of the word at the heart of its mission, vision and strategy. The mission we have in mind at Fluvius states: "We connect society in a sustainable way with our multi-utility networks". From this point of view, our vision is that we want to help realise the energy transition and climate adaptation in Flanders through active cooperation. And, finally, in our business strategy, we have formulated the objective of working on future-oriented networks and systems that are necessary to develop our vision.

That is why we also focus our investment policy on both the energy transition (as an essential part of climate mitigation) and climate adaptation. Of course, this strategic approach requires the necessary financial resources, a lot of financial resources. Fluvius is convinced that green financing is a valid source of financing that can appeal to investors. Already in 2020, we launched an institutional green bond for an amount of EUR 600 million. In June 2023, private investors were also given the opportunity to subscribe to a green bond issued by Fluvius, which ultimately raised EUR 240 million.

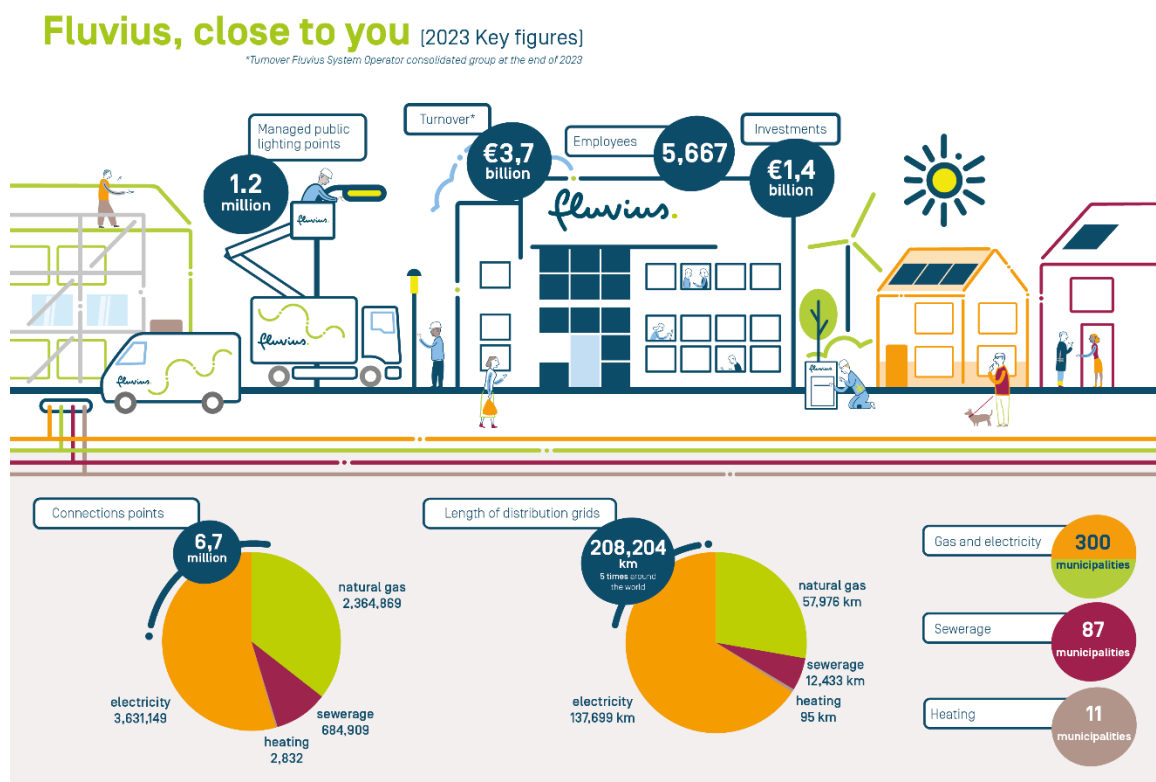
In this report, we explain what the funds raised were used for, and what positive social impact we have achieved with them. On behalf of all managers and employees of Fluvius, I wish you an enlightening reading of this report.

*David Termont, CFO Fluvius*

## 2. Context

Fluvius System Operator cv ("Fluvius") is a leading multi-utility company in the Flemish Region (Belgium). It develops activities in various network-related utilities: (1) the distribution of electricity, (2) the distribution of gas, (3) public lighting, (4) sewerage, (5) heat networks, and (6) a number of activities that support one or more of those activities sq, such as the associated data management.

The company is 100% owned by the cities and municipalities in the Flemish Region.



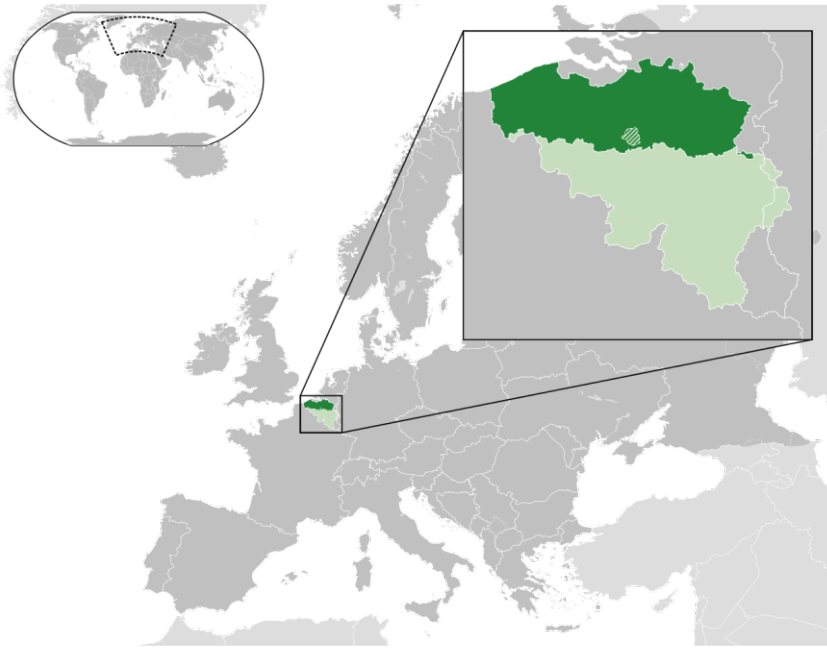
Key figures 2023

Fluvius offers its services in all 300 Flemish cities and municipalities. The grid infrastructure is owned by eleven intermunicipal utility companies<sup>1</sup> that are the sole shareholders of Fluvius System Operator. As such, the company is Flanders' largest provider of utilities. It manages<sup>2</sup> almost 138,000 km of electricity grids, 58,000 km of gas grids and 12,400 km of sewer infrastructure. It manages a total of about 6.7 million connections. For municipal public lighting in Flanders, Fluvius manages 1.2 million light points.

The company is of strategic importance for the Flemish Region and its policy on the climate and energy objectives set by Europe.

<sup>1</sup> These 11 intermunicipal associations are: Fluvius Antwerp, Fluvius Limburg, Fluvius West, Gaselwest, Imewo, Intergem, Iveka, Iverlek, PBE, Riobra and Sibelgas. From 1 January 2025, this group will be reshuffled without having any impact on the entire area of operation of Fluvius.

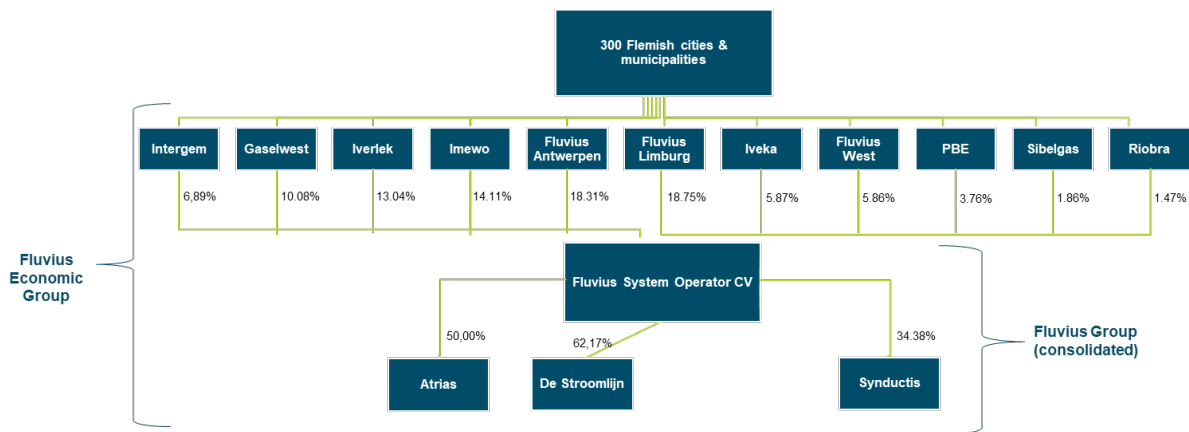
<sup>2</sup> Rounded figures at the end of 2023.



Operational area of Fluvius System Operator, indicated in dark green

On 31 December 2023, Fluvius had 5,667 employees, which is the sum of the contractual employees at Fluvius System Operator CV and the statutory employees at Fluvius OV.

The group structure of the Fluvius Economic Group is as follows:



Group structure of the Fluvius Economic Group (as at the end of 2023)

Fluvius' strengths are:

- it is the largest Flemish multi-utility company and covers the entire Flemish Region;
- its shareholders are 100% public entities, i.e. all 300 Flemish cities and municipalities;
- it has a low-risk profile across all its areas of activity;
- the Fluvius Economic Group has a robust capital structure, a strong liquidity position and cash flows that derive for the most part from its core regulated activities – this is demonstrated by the investment grade rating at Moody's (A3, negative outlook);
- The company has highly experienced managers and staff;

- Fluvius places strategic emphasis on operational excellence, synergies and sustainability.

### Our CSR and sustainability policy

Fluvius System Operator's commitment to Corporate Social Responsibility (CSR) and sustainability is set out in its CSR Charter, approved by the Board of Directors on 4 December 2019. This document can be accessed online here: <https://over.fluvius.be/sites/fluvius/files/2019-12/9010106-mvo-charter-2019.pdf>

In recent years, Fluvius has taken numerous initiatives (both internally and externally) to improve its CSR and sustainability performance. Our policies and actions are supervised, coordinated and prepared by an internal CSR Board, which reports directly to the company's Management Committee and indirectly (via the Management Committee) to the Board of Directors.

Fluvius aligns its sustainability reporting with the regulatory and legal frameworks in force, in particular the EU Taxonomy and NFRD/CSRD<sup>3</sup>.

Our CSR and sustainability policies and performance are independently screened and assessed by a number of specialised agencies such as Sustainalytics, Moody's ESG and ISS ESG. You can consult their most recent reports on Fluvius on the websites of these agencies.

For more information about our sustainability performance, please refer to the annual reports of Fluvius System Operator.

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<sup>3</sup> NFRD: Non-Financial Reporting Directive; CSRD: Corporate Sustainability Reporting Directive

### 3. Green bond 2023

Fluvius issued a green bond for the first time on 2 December 2020. It was an institutional bond of EUR 600 million with a maturity of ten years and a fixed annual coupon of 0.250%. This issuance took place under the issuer's Euro Medium Term Note (EMTN) programme. The ISIN code of this green bond is BE0002755362. This debt instrument is listed on the regulated market of Euronext Brussels.

The green bond covered by this allocation and impact report was issued in June 2023. It was a so-called retail bond, specifically aimed at the private investor in Belgium. This bond raised an amount of EUR 240 million and had a maturity of four years (maturing on 28 June 2027). The bond, issued under Fluvius' EMTN programme, gives a fixed annual coupon of 4.00%. The ISIN code is BE0002952332 and the listing is done on the regulated market of Euronext Brussels. The proceeds of this bond will be used by the issuer for the purposes set out in the Green Finance Framework, 2023 edition. This document can be found online at <https://over.fluvius.be/sites/fluvius/files/2023-06/raamwerk-groene-financiering-2023.pdf>.

The net proceeds were effectively used for the following four investment categories:

1. *digital meters for electricity*
2. *LED in public lighting*
3. *Sewerage networks*
4. *Adjustments to electricity distribution networks to enable renewable energy*

Important note: For categories 1 (digital electricity meters) and 4 (grid adaptations for energy transition), only half of the total investment value defined in this allocation report is taken into account as the use of the proceeds of this green bond, as the European Investment Bank (EIB) has only taken into account a maximum of half of the investment value for categories 1 (digital electricity meters) and 4 (grid adaptations for energy transition) of the project cost through loans.

An independent so-called 'Second Party Opinion (SPO)' on the Green Finance Framework 2023 was provided by the specialised ESG rating agency ISS ESG, dated 29 May 2023 (<https://over.fluvius.be/sites/fluvius/files/2023-06/spo-on-fluvius-green-finance-framework.pdf>).

This green bond makes a significant contribution to Fluvius' overall sustainability strategy and policy. The proceeds were used for investments in the networks owned by Fluvius' shareholders, in particular the intermunicipal utility associations.

## 4. Allocation

The nominal amount raised with the Green Bond 2023 amounted to EUR 240 million; its net proceeds also amounted to EUR 240 million.

The period for allocating the proceeds of the 2023 Green Bond to investments runs over the full year 2023, i.e. a look-back period of almost six months (January to June 2023) and a look-forward period of six months (July 2023-December 2023). This Allocation & Impact Report is based on the cumulative figures for the entire period indicated above, i.e. from 1 January 2023 to 31 December 2023.

Until the closing date of 31 December 2023, all proceeds from the 2023 Green Bond were fully allocated to new investments. No proceeds were used for refinancing purposes.

All the investments involved were carried out in the Flemish Region (Belgium), the operating area of the issuer Fluvius System Operator.

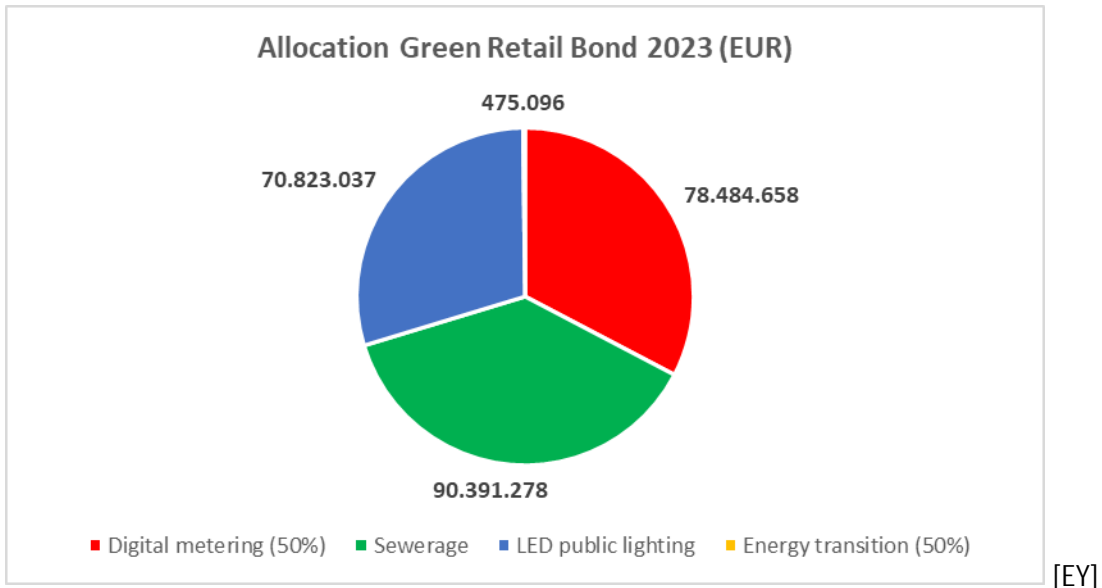
As of the end of December 2023, the amounts listed in the table below had been allocated to the four selected investment categories:

SUMMARY OF ALLOCATION		
	EUR	%
Digital metering (50%)	78.484.658	32,7%
Sewerage	90.391.278	37,6%
LED public lighting	70.823.037	29,5%
Energy transition (50%)	475.096	0,2%
TOTAL	240.174.069	100,0%
<i>Delta 240 mEUR</i>	<i>174.069</i>	

[EY]

As shown in this table, the full proceeds of the 2023 Green Bond (EUR 240 million) were allocated within the set allocation period. The percentage allocation across the four selected investment categories shows the following:





For two of the selected categories, the following tables provide more detailed information:

Digital Meters Electricity [EY]	
EUR	2023
1st half of the year	87.243.578
2nd half of the year	69.725.738
<b>Total</b>	<b>156.969.316</b>
Total (50%)	78.484.658

LED public lighting [EY]	
EUR	2023
1st half of the year	30.858.405
2nd half of the year	39.964.632
<b>Total</b>	<b>70.823.037</b>

## 5. Impact

The following is a summary of the impact of the investments in each of the selected investment categories financed by the Green Bond 2023.

### A. Digital electricity meters

In order to be able to correctly assess the data below:

- For the impact calculation, only half of the total number of installed meters will be taken into account for the number of installed digital electricity meters, as the proceeds of the 2023 Green Bond were used for only half of the total investment, the other half was financed by a loan facility from the European Investment Bank (EIB);
- the figures for energy saved were calculated by applying a savings coefficient of 2.60% to the annual electricity consumption<sup>4</sup> of residential end users as soon as a digital meter is installed at their premises, and this on an average annual consumption of 3,500 kWh<sup>5</sup> by residential consumers in Flanders. In this way, we use a method that the Flemish energy regulator VREG also uses;
- we have made the choice to calculate the CO2 reductions using a conversion coefficient of 178 gCO<sub>2</sub>eq/kWh<sup>6</sup>.

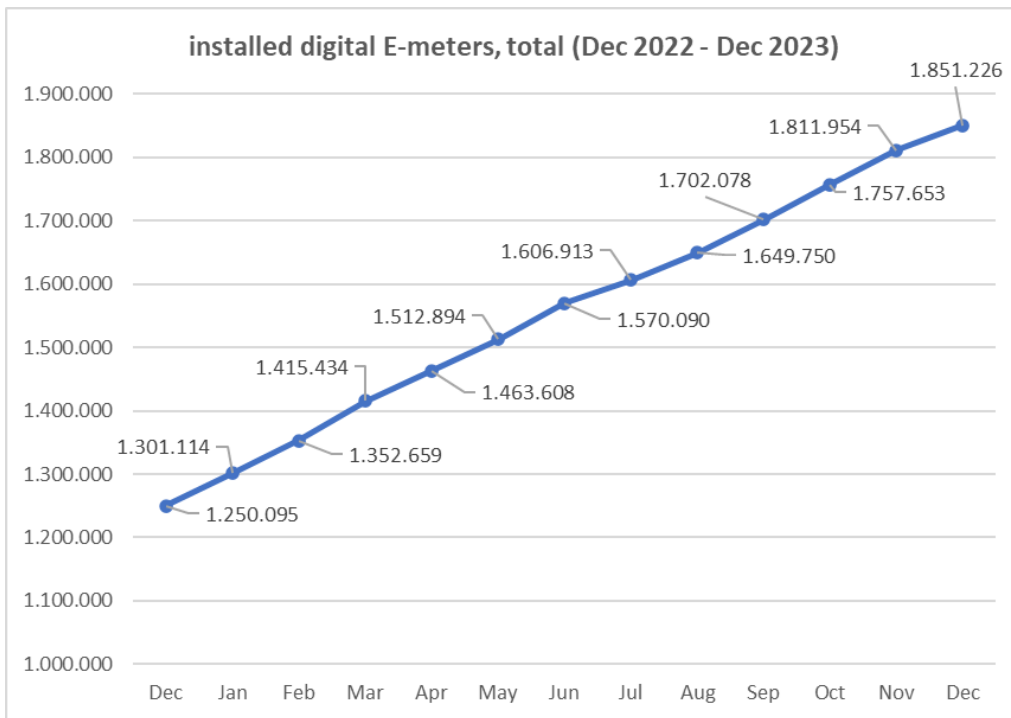
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<sup>4</sup> Source: VREG, <https://www.vreg.be/sites/default/files/document/rapp-2017-06.pdf>

<sup>5</sup> Source: VREG, <https://www.vreg.be/nl/energieverbruik>

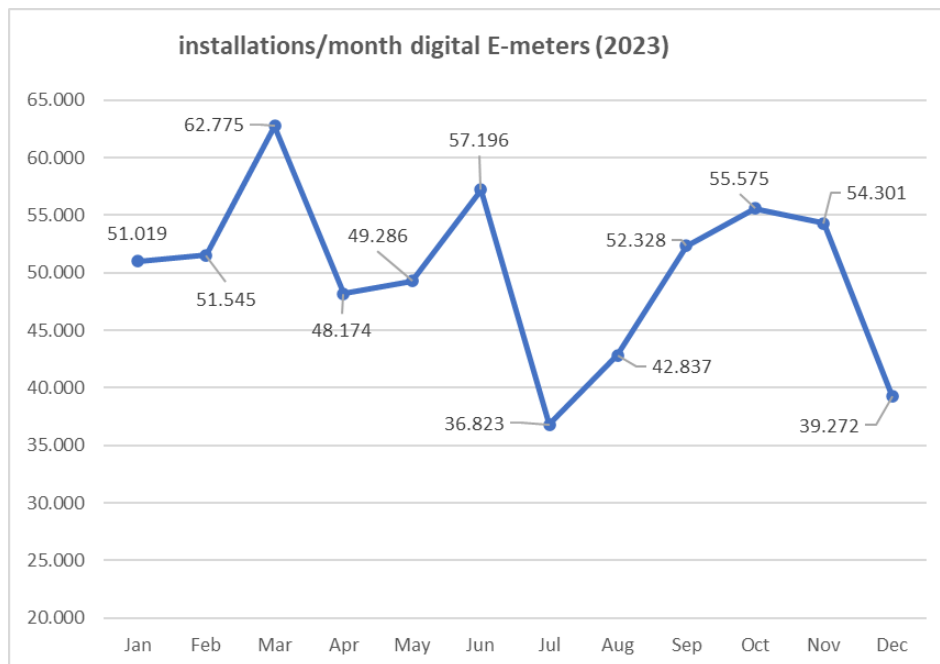
<sup>6</sup> Source: <https://app.electricitymap.org/map> (figure for the year 2023; figure for Belgium)

Fluvius started the formal roll-out of the digital electricity meter in July 2019. From then until the end of 2023, more than 1.8 million such meters<sup>7</sup> [EY] were put into service. Based on the parameters indicated above, this has led to energy savings for the year 2023 (at a rate of 50%) of 27,379.7 MWh, which corresponds to avoided carbon emissions of 4,873,581 kg of CO<sub>2</sub> [EY]. Cumulatively until the end of 2023 (also at a rate of 50%), the investments in digital electricity meters have led to a consumption reduction of 84,352.4 MWh and a carbon reduction of 15,014,720 kg CO<sub>2</sub> [EY].



<sup>7</sup> This is the total number of meters for electricity.

A total of<sup>8</sup> 601,131 digital electricity meters were installed in 2023. On average over 2023, Fluvius installed 50,094 digital E-meters per month.



The current plan is to install 65% to 70% of the planned number of digital meters by the end of 2024, and 80% by the end of 2025. The full rollout should be completed in 2029.

Our end users are increasingly responding to the new possibilities of use that the digital meter offers them, which is a pleasing finding. We notice that households with a digital meter are starting to actively monitor their electricity consumption, which enables them to reduce and optimize their electricity consumption. Our portal website [mijn.fluvius.be](https://mijn.fluvius.be) provides an individual end user with information about the exact consumption volume of electricity on a quarter-hour basis.

A growing number of end users have linked their digital meter to a 'smart app' or smart devices. This allows them to consume their energy at the best possible moments, which increases flexibility on the distribution grid ([www.maakjemeterslim.be](https://www.maakjemeterslim.be)).

<sup>8</sup> Does not take into account the reduction of up to 50% as discussed on page 11.

## B. LED in public lighting

In order to be able to correctly assess the data below:

- The specified numbers of light points refer to installations with and without LED technology;
- the observed decrease in the annual consumption of public lighting is due to the increase in the share of LED in municipal public lighting, but also to greater flexibility made possible by LED technology (dimming of lights, switching on/off by motion sensors, etc.);
- CO2 reductions were calculated using a conversion coefficient of 178 gCO<sub>2</sub>eq/kWh. See also above in this report for a discussion of the conversion coefficient applied.

The numerical evolution of the further roll-out of LED technology in 2023 is included in the table below. 131,559 LED light points were installed, which is an average of 10,963 installations per month. By the end of 2023, almost half of the public transport infrastructure of Flemish cities and municipalities had been converted.

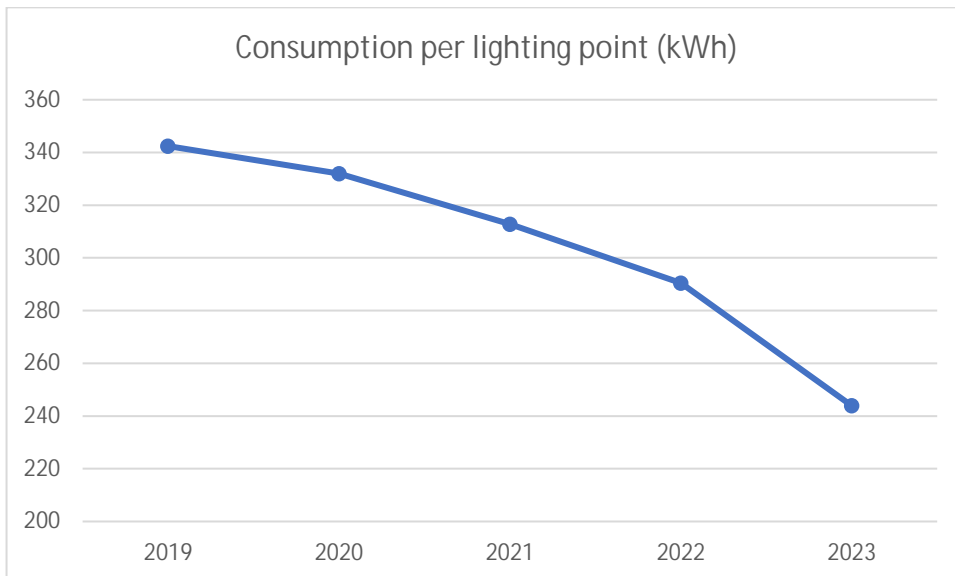
LED in public lighting					
		# led	# lighting points	# new led	% led
2022	Dec	419.239	1.179.854	7.036	35,53%
2023	Jan	425.612	1.179.512	6.373	36,08%
	Feb	433.504	1.180.328	7.892	36,73%
	Mar	445.282	1.181.234	11.778	37,70%
	Apr	457.554	1.179.955	12.272	38,78%
	May	466.722	1.179.932	9.168	39,55%
	Jun	480.952	1.180.271	14.230	40,75%
	Jul	490.484	1.181.255	9.532	41,52%
	Aug	499.485	1.182.254	9.001	42,25%
	Sep	511.333	1.183.050	11.848	43,22%
	Oct	526.502	1.184.031	15.169	44,47%
	Nov	537.969	1.185.338	11.467	45,39%
	Dec	550.798	1.188.602	12.829	46,34%



We have calculated the impact of the investments made by Fluvius in 2023 for the conversion of municipal public lighting to LED, financed by the proceeds of the Green Bond 2023, as follows.

We compare the standard annual consumption for public lighting in 2022 with that of 2023. .The difference of both is then multiplied by the CO2 conversion coefficient to determine the CO2 reduction achieved.

Number of lighting points	
2022	1.179.854
2023 [EY]	1.188.602
Delta 2022-2023	+0,7%
Standard annual consumption of public lighting (kWh)	
2022	342.661.941
2023	289.919.824
Delta 2022-2023	-52.742.117
Delta (%) 2022-2023	-15,4%
Converted lighting points 2023	131.638
CO2 reduction 2023 <sup>9</sup> [EY]	= 52,742,117 kWh x 178 gCO <sub>2</sub> eq/kWh = 9,388,096,826 g CO <sub>2</sub> or 9,388,097 kg CO <sub>2</sub>
Consumption per lighting point (kWh)	
2022	290,4
2023	243,9
Delta 2022-2023	-46,5
Delta % (2022-2023)	-16,0%



<sup>9</sup> For the choice of the conversion coefficient, see section 5.4 earlier in this report.

By the end of 2023, Fluvius had already converted 46.4% of the public transport infrastructure of the Flemish municipalities to LED.

On 12 October 2022, Fluvius announced its decision to accelerate the roll-out of LED in public lighting. The original end date for the 2030 investment programme was postponed to the end of 2028. The accelerated rollout means that the number of light points that are converted each year will increase from about 100,000 to about 133,000. Of course, the higher roll-out speed will have an immediate positive impact on the energy efficiency gains for local authorities and the associated CO2 reduction.

### C. Sewerage networks

About a quarter of the proceeds from the Green Bond 2023 were used for the construction of sewerage networks, both new construction (expansion investments) and the replacement of outdated parts of the network (replacement investments). Well-designed sewerage networks, with a separation of rainwater and wastewater, can contribute to the Flemish Government's Blue Deal plan, which aims to tackle water shortages and drought.

During the allocation period, four intermunicipal entities of the Fluvius Economic Group were active in the sewerage segment:

1. Riobra: 27 municipalities
2. Fluvius Antwerp: 4 municipalities
3. Fluvius Limburg: 36 municipalities
4. Fluvius West: 20 municipalities,

or a total of 87 municipalities.

<i>Indicator</i>	
Grid length 2017 (km)	10.655
Grid length 2022 (km)	11.907
Grid length 2023 (km) [EY]	12.249
Delta net length 2017-2023 (km)	1.594 (+15,0%)
Delta net length 2022-2023 (km)	342 (+2,9%)

The figure for the 2017 network length is only included as a starting point. As a reminder, in 2017 fewer municipalities were affiliated with a sewer operator from the Fluvius Economic Group, so the figures for 2017 and 2023 are not fully comparable.

Data from the Flemish Environment Agency (VMM) on the average sewerage level provide a good picture of the progress made in the development of the sewerage networks. The sewerage rate is defined as the ratio between the number of inhabitants connected to a sewerage network in relation to the total number of inhabitants.

Based on VMM data for the sewerage council per municipality<sup>10</sup> (situation May 2024), we have calculated the sewerage level<sup>11</sup> for each of the four intermunicipal companies with sewerage activities (Riobra, Fluvius Limburg, Fluvius West and Fluvius Antwerp) separately and for the group of these four entities as a whole. The calculation method used takes into account the number of inhabitants in each municipality: the sewerage level that VMM specifies for a particular municipality is multiplied by the fraction with the numerator showing the number of inhabitants in that municipality and the denominator being the number of inhabitants of the sewerage operator. The 'reduced' sewerage grades of each municipality are then totaled for each sewerage company. For the number of inhabitants, the official population figures from the

<sup>10</sup> <https://vmm.vlaanderen.be/feiten-cijfers/water/riolering-en-waterzuivering/indicator-zuiveringsgraad>

<sup>11</sup> Using the weighted average method



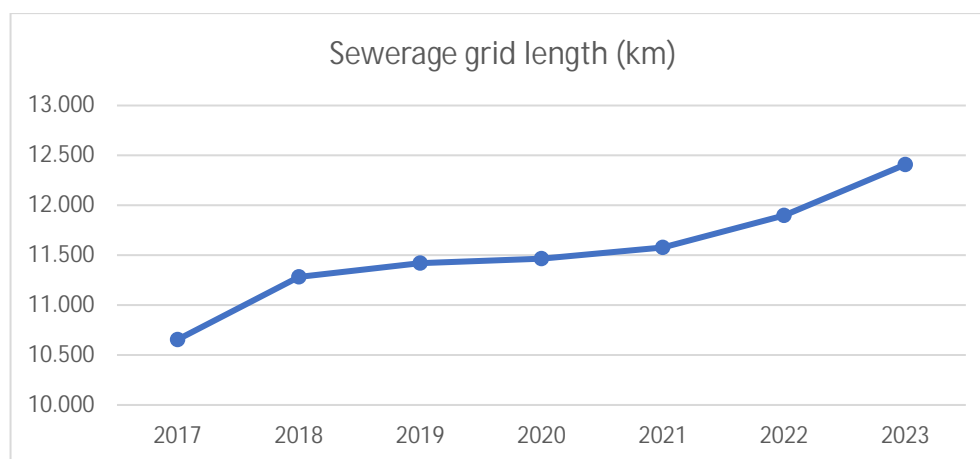
National Register on 1 January 2024<sup>12</sup> have been used. The same goes for the four sewerage operators as a whole. This is the result:

Operator	Number of municipalities	Number of inhabitants	Sewerage rate [EY]
Fluvius-Antwerp	4	48.245	84,62
Fluvius-Limburg	36	781.166	96,36
Fluvius-West	20	271.540	91,22
Riobra	27	319.817	93,97
<b>FLUVIUS TOTAL</b>	<b>87</b>	<b>1.420.768</b>	<b>94,44</b>
<b>FLANDERS</b>	<b>300</b>	<b>6.815.968</b>	<b>93,29</b>

When we compare these figures with the figures for the 2022 sewerage level (as included in the Allocation & Impact Report of April 2024), we see this picture:

Sewerage Rate (%)	2022	2024	Difference (in percentage points)
Fluvius Antwerp	82,13	84,62	+2,49
Fluvius Limburg	91,64	96,36	+4,72
Fluvius West	79,43	91,22	+11,79
Riobra	75,44	93,97	+18,53

VMM has not released recent data on the degree of purification. The degree of purification is defined as the ratio of the number of inhabitants connected to an Aquafin treatment plant<sup>13</sup> to the total number of inhabitants. The most recent figure released by VMM for the treatment levels is that for April 2022 and is therefore not useful to assess the impact of Fluvius' sewerage investments in 2023.



The graph above shows the above-average growth of the sewerage network in 2023 compared to the increased network length of previous years. This accelerated growth has been made possible in part by the proceeds of the Green Bond 2023.

<sup>12</sup> [https://www.ibz.rrn.fgov.be/fileadmin/user\\_upload/fr/pop/statistiques/population-bevolking-20240101.pdf](https://www.ibz.rrn.fgov.be/fileadmin/user_upload/fr/pop/statistiques/population-bevolking-20240101.pdf)

<sup>13</sup> Aquafin collects the wastewater from Flemish cities and municipalities and then purifies it in its wastewater treatment plants before returning the treated water to the environment.

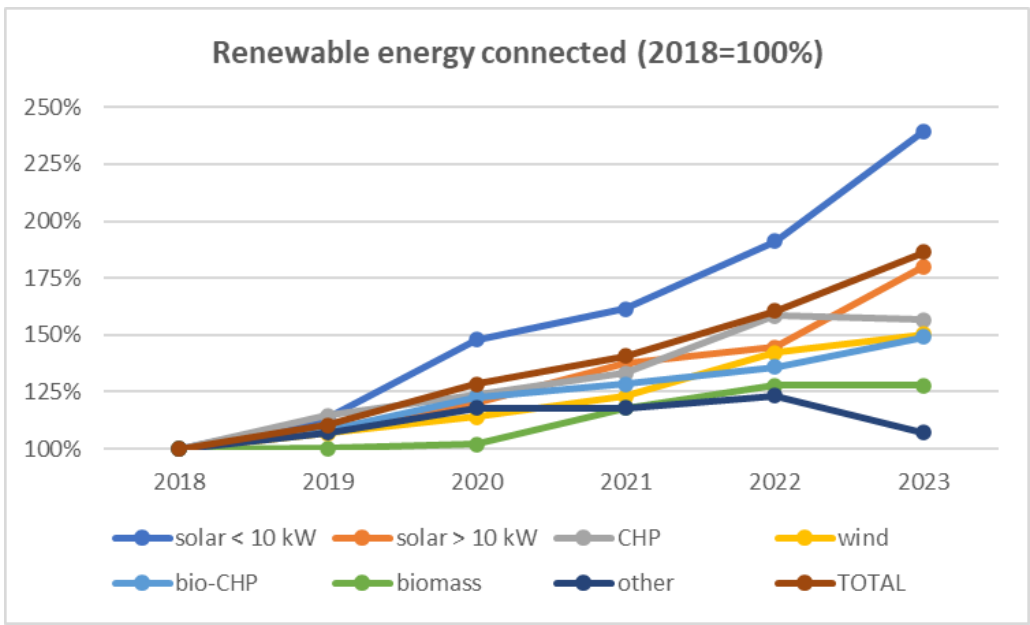
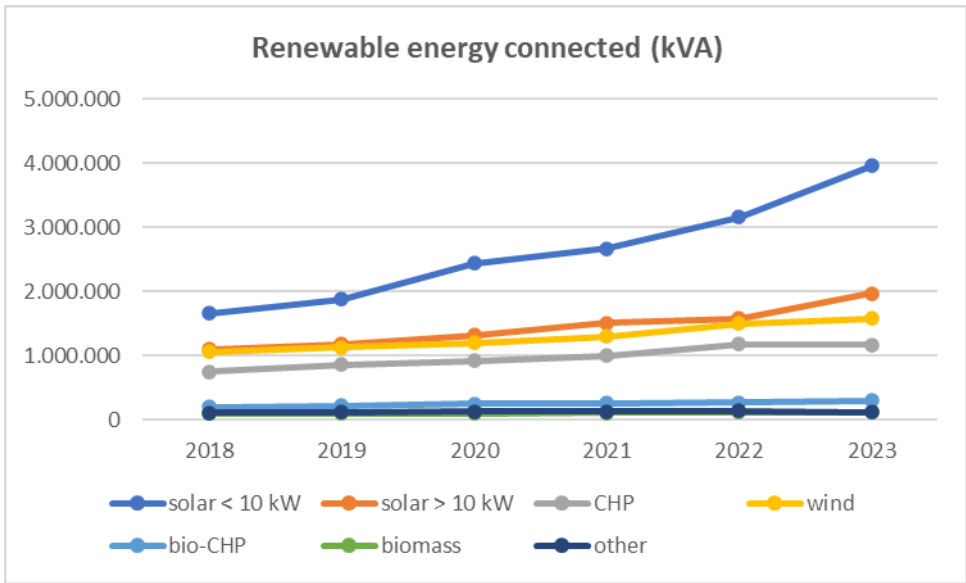
#### D. Grid modifications in electricity for the integration of renewable energy

Investments in energy transition are considered a closing item for the allocation to the Green Bond 2023. It has therefore been decided to take into account only investments in the connections of charging points for electric vehicles. It concerns an amount of EUR 950,192, half of which is EUR 475,096. However, it is clear that the investments made by Fluvius in the energy transition in 2023 take many forms: modifications to cabins, the low- and medium-voltage grid, grid modifications to enable wind turbine projects to connect voltage conversion from 230 V to 400 V. The total Fluvius investments in energy transition for 2023 are estimated at more than EUR 135 million.

In order to provide an all-encompassing insight into the impact that Fluvius has achieved with the energy transition investments in 2023, we are not only looking at the allocated investments for the connection of charging stations, but at all relevant investments. This mainly concerns local reinforcements of the low-voltage grid, and to a lesser extent the reinforcement of transformer substations, the construction and equipping of new transformer substations, the adaptation of connections to the low-voltage grid, modifications to the medium-voltage grid, and so on. Investments were also made to enable the installation of charging points for electric mobility. All these projects, which were smaller in themselves, were needed to integrate local, renewable capacity into the electricity system in an efficient and reliable way.

The renewable energy capacity connected to the distribution grid is mainly installed capacity in the form of onshore wind turbines and an increasing volume of solar panels installed by households, SMEs and public authorities. At the end of 2023, no less than 9,189,944 kVA [EY] of decentralised, renewable generation capacity was connected to the Flemish distribution grid. The spectacular increase in the volume of small PV installations is particularly striking. Only during the year 2023 did the connected capacity of small (<10 kW) solar panel installations increase by no less than 25.4%, that of large installations (>10 kW) by 24.3%. The small-scale PV installations now account for 43.1% of the total capacity. The total renewable capacity linked to the grids managed by Fluvius grew by 16.0% in 2023.

These figures clearly show the extent to which Fluvius must continue to invest in order to adapt the electricity distribution networks to the rapidly changing conditions of production capacity in Flanders.



## 6. Contribution to the SDGs

As indicated in the Fluvius Green Finance Framework (2023 edition), the selected investment categories for the Green Bond 2023 and the allocated proceeds from the Green Bond 2023 contribute to a substantial or limited extent to various United Nations Social Development Goals (also known as the SDGs):

CATEGORY	CONTRIBUTION?	SDG
Energy efficiency (LED in public lighting)	yes	7 / 13
Sewerage infrastructure	yes	6 / 13
Clean transport (EV mobility)	yes	7 / 13

*source: ISS ESG Second Party Opinion (29 May 2023)*

## 7. Independent audit report

The Fluvius Green Financing Framework (2023 edition) requires external verification of the instruments issued under this Framework, both at the time of issuance and in an annual assurance.

For the Green Bond 2023, a pre-issue Second Party Opinion was issued by ISS ESG. In this report, ISS ESG assessed the issuer's Green Financing Framework, its overall Corporate Social Responsibility and sustainability strategy and performance, as well as the bond's alignment with the Green Bond Principles (GBP) elaborated by the International Capital Markets Association (ICMA) and the Green Bond Standards as set by the European Commission at the time of issue.

All financial and non-financial figures indicated with tickmark [EY] in this Allocation & Impact Report on the Green Bond 2023 have been subject to an assurance engagement with limited assurance by EY Bedrijfsrevisoren BV. Their integral findings are included below.

## Independent auditor's assurance report

### Scope

We have been engaged by Fluvius System Operator CV (the "Company") to perform a limited assurance engagement in accordance with the International Standard on Assurance Engagements Other Than Audits or Reviews of Historical Financial Information ("ISAE 3000 revised"), hereafter referred to as "the Engagement", and to report on the financial and non-financial information with tickmark "EY" (the "Subject Matter"), included in the Green Retail Bond 2023 Allocation and Impact Report ("the Report") of Fluvius System Operator CV for the period from 1 January 2023 to 31 December 2023.

Other than the scope of our engagement as described in the preceding paragraph, we did not perform assurance procedures on the remaining information included in the Report, and accordingly, we do not express a conclusion on this information.

### Criteria applied by Fluvius System Operator CV

In preparing the Report, Fluvius System Operator CV applied the criteria as set forth in the Green Bond Framework version 2023, pages 11 to 14 (the "Criteria"), which is available on the website of the Company.

### Fluvius System Operator CV's responsibilities

Fluvius System Operator CV's management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the Subject Matter, such that it is free from material misstatement, whether due to fraud or error.

### EY's responsibilities

Our responsibility is to express a limited assurance conclusion on the Subject Matter, based on the evidence we have obtained. We conducted our limited assurance engagement in accordance with International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information ("ISAE 3000 revised") and the terms of reference for this engagement as agreed with the Company on 5 December 2024.



**Shape the future  
with confidence**

ISAE 3000 revised requires that we plan and perform our engagement to express a conclusion on whether we are aware of any material modifications that need to be made to the Subject Matter in order for it to be in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the information obtained is sufficient and appropriate as a basis for our limited assurance conclusion.

### **Our Independence and Quality Control**

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants and have the required competencies and experience to conduct this assurance engagement.

We apply the International Standard on Quality Management 1 'Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services.' This standard requires us to design, implement, and manage a quality management system, including policies or procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

### **Description of procedures performed**

Procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the Subject Matter and related information and applying analytical and other appropriate procedures.



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Our procedures included amongst others:

- ▶ Obtaining an understanding of the reporting processes for the Subject Matter;
- ▶ Evaluating the consistent application of the Criteria and the appropriateness of the entity's own reporting criteria in terms of relevance, completeness, reliability, neutrality, and clarity;
- ▶ Interviewing management and relevant staff at corporate level responsible for data collection, data aggregation and for carrying out internal control procedures on the Subject Matter;
- ▶ Interviewing relevant staff that are responsible for reporting the Subject Matter in the Report;
- ▶ Obtaining internal and external documentation that reconciles with the Subject Matter;
- ▶ Performing analytical review of the data and trends in the Subject Matter;
- ▶ Performing limited tests of details and tracing the input information to supporting invoices or other evidence;
- ▶ Evaluating the overall presentation of the Subject Matter in the Report;

We also performed such other procedures as we considered necessary in the circumstances.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusion.

### **Conclusion**

Based on our limited assurance procedures, nothing has come to our attention that causes us to believe that the Subject Matter was not presented, in all material respects, in accordance with the Criteria.

Ghent, 6 January 2025

EY Bedrijfsrevisoren BV  
Represented by

Marnix Van Dooren\*  
Partner

\*Acting on behalf of a BV

25MVD0062



## 8. Disclaimer

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