

*fluvius.*

Annual report  
Fluvius System Operator 2024

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# Preface

## Wim Dries, Chairman of the Board of Directors

Dear reader,

The energy transition and climate adaptation are no longer at far distance. The world is changing rapidly and the challenges for Fluvius are greater than ever. Last year, Fluvius once again took up the challenge of preparing its networks for tomorrow. We look back on this in our 2024 annual report.

This year, the 'no-regret' energy transition Investment plan for the period 2024-2033 was updated. Fluvius is investing an additional 4 billion euros in the Flemish electricity grid over the next ten years to cope with accelerated electrification and the growth of local production. For natural gas, we have a keep-it-running policy; in the longer term, repurposing the natural gas grid is an option. We want to roll out all public lighting by 2028.

Fluvius will grow into a digital grid operator in the coming years. The energy market of the future is much more volatile, with new market players. By fully focusing on digitalisation, we as a grid company will create new opportunities and guide our customers in the energy market of tomorrow. The digital meter plays a key role in this.

The climate has changed significantly in recent years. That is why we continue to work on rain and drought plans for local governments. We will also ensure that our sewerage network withstands climate change by sharply increasing investments in the coming years. This is how we respond to European and Flemish regulations.

In 2025, too, we will continue to build the networks for tomorrow, in a sustainable way. As a network company, we have a responsibility to minimise the impact on our environment and value chain and to ensure sound governance. Only in this way can we sustainably connect society with our multi-utility networks.

Wim Dries, Chairman of the Board of Directors



## Frank Vanbrabant, CEO Fluvius

Dear reader,

The past year was once again particularly challenging for Fluvius. We continued to work on the energy transition, digitalisation and climate adaptation. We are now almost at cruising speed with the construction of our networks for tomorrow.

We are helping to realise the energy transition and digitalisation thanks to targeted investment plans in infrastructure and digitalisation. We want to implement these timely and efficiently, to safeguard the comfort of our customers. Last year, we installed many kilometres of new electricity cables and digital cabins. We also developed many new data applications and are continuing to focus on the digitalisation of our grid management. Because the electricity network of the future must be reliable, flexible and digital.

The cornerstone of a digital network is the digital meter. We have now installed more than 4 million of them. The measurement data is important, because it gives our customers and ourselves as grid operators insight into consumption and peak loads. And thanks to data, new services are made possible, such as energy sharing, dynamic contracts or monthly invoicing. Digitalisation will become even more important in 2025. Together with other market players, we are working on flexibility on our networks, for optimal network use. We are also drawing up a data management investment plan with our ambitions in this area for the future.

In addition, climate adaptation is also a major challenge for Fluvius. Climate change forces us to work on a modern sewerage network. In 2024, most attention went to connecting homes without a sewerage connection, in order to achieve the reduction targets of the VMM and the European framework directive. We also invested in new separate sewerage networks and local water purification plants for remote homes. From 2025, we will further increase the investment volume for sewerage.

We were only able to realise all the projects in the annual report by working together. I am proud of our team of almost 6,000 employees who are ready day and night. And they are happy to do so, because in 2024 they once again rated Fluvius as a 'Great place to work'. In the coming years, we will increasingly collaborate with our local authorities, the Flemish Government, the regulators, the transmission system operator, the other distribution system operators and a whole range of stakeholders. Only by joining forces can we successfully tackle all challenges.

Frank Vanbrabant, CEO Fluvius



A modern lounge area with several blue armchairs and a light-colored sofa arranged on a wooden floor. The scene is brightly lit, suggesting a contemporary office or meeting space.

# Management review

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# About this report

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# Contents of the report

This version of the annual report is a translation. Only the Dutch version is binding.

In accordance with the law and the articles of association, we present this Annual Report on the activities of Fluvius System Operator cv ('Fluvius') during the past financial year 2024.

This report is a combined report in which the Management Review, the Sustainability Statements and the Financial Statements are combined in one single report.

In the Management Review, we present the following documents:

- Corporate report
- Remuneration report
- Report on certain non-financial elements and diversity aspects (Act of 3 September 2017 on the publication of non-financial information and information on diversity by certain large companies and groups).

In the Sustainability Report, we present the following documents:

- Sustainability statements according to the European Sustainability Reporting Standards, in function of being compliant with the EU Corporate Sustainability Reporting Directive (CSRD)<sup>1</sup>,
- EU Taxonomy tables: an analysis of the business activities of Fluvius, in particular to the degree in which they are eligible ('eligibility') for and aligned ('alignment') to the EU Taxonomy, cfr article 8 of the relevant Regulation<sup>2</sup>,
- References to the GRI standards (version 2021), as established by the Global Reporting Initiative (GRI). The information in the GRI table in attachment of this annual report is an integral part of the annual reporting, but not of the sustainability statements.

In the Financial Report, we present the following documents:

- The company financial statements for the financial year ended 31 December 2024. These financial statements have been drawn up in accordance with Belgian accounting standards (BE-GAAP). They comprise the balance sheet, the income statement with comments, the explanatory notes, the distribution of profits and the social balance sheet;
- The consolidated financial statements for the financial year 2024 of the Fluvius Group ended 31 December 2024, in accordance with the IFRS (International Financial Reporting Standards) accounting standards;
- The reports by the Statutory Auditor on the financial statements for 2024 in BE-GAAP and IFRS;
- The declaration by the persons responsible for the financial statements and the annual report (cf. article 12, §2 of the Royal Decree of 14 November 2007 concerning the obligations of issuers of financial instruments admitted to trading on a regulated market).

<sup>1</sup> Directive (EU) 2022/2464

<sup>2</sup> Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.

# Reading guide

The Fluvius annual report offers an overview of the company's performance and activities during the financial year 2024. This report was approved for publication by the Board of Directors of Fluvius System Operator on 26 March 2025 and was published on 28 March 2025.

For all information, consolidation is valid irrespective of materiality, unless otherwise stated. The scope of consolidation is Fluvius System Operator and De Stroomlijn. In the management review, also the evolutions at associates Atrias, Synductis and Wyre Holding are disclosed. Supplementary interpretation on the scope of the qualitative and quantitative data is provided, where necessary, with the information for which this interpretation is relevant.

The company's structure, activities and strategy are presented. We take a look at the major financial and non-financial evolutions over the reporting period and look forward to the future of the energy and climate transition. We give the reader an insight into how Fluvius approaches sustainability and integrates it into the corporate strategy and the operational activities, with relation to the environment, social aspects as well as governance. Finally, the reader can consult the financial report.

The report is based on these starting points: our valuable role in the energy and climate transition, our stakeholder dialogue, materiality and transparency.

For reporting purposes on the financial year 2024 and compared to previous reports, this report has undergone a transformation on a number of levels. The addition of the CSRD statements was considered to be a leverage to set up a future-oriented reporting which is compliant with present and future legal requirements, but which also satisfies our stakeholders' expectations, both as to content and lay-out.



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## Fluvius, close to you

The cooperative company Fluvius System Operator (known operationally under the working name of 'Fluvius') is the Flemish multi-utility grid operator that came into being on 1 July 2018 from the merger of Eandis System Operator CVBA and Infrac CVBA. On 1 April 2019, the former Integan ov joined the Fluvius Economic Group when acquired by ex-lveg (now Fluvius Antwerpen).

Fluvius is responsible for the construction, management and maintenance of distribution grids for electricity, natural gas, sewerage and heat. The company also manages a substantial part of the municipal public lighting system in Flanders, with 1,197,534 lighting points. The data management that supports the above-mentioned business activities is also part of Fluvius' remit.

In total, Fluvius manages 211,125 kilometres of utility networks. Fluvius is active in all 300 Flemish cities and municipalities<sup>1</sup>, which means that everyone in Flanders can benefit from the professional service provided by our 5,863 employees.

In the free energy market in Flanders, Fluvius, as operator of the distribution grid, is an indispensable link between energy producers, energy consumers and transmission system operators.

<sup>1</sup> Until 31 December 2024, there were 300 cities and municipalities in Flanders. As a result of a number of mergers of municipalities, this number has been reduced to 285 as from 1 January 2025.



## Working for our shareholders, the mandated associations

Fluvius System Operator is the operating company for eleven Flemish utility companies, each of which is legally constituted as an intermunicipal 'mandated association'. They are also the shareholders of Fluvius System Operator:

	Electricity	Natural gas	Sewerage	Public lighting
Fluvius Antwerpen	x	x	x	x
Fluvius Limburg	x	x	x	x
Fluvius West	x	x	x	x
Gaselwest	x	x		x
Imewo	x	x		x
Intergem	x	x		x
Iveka	x	x		x
Iverlek	x	x		x
PBE	x			x
Riobra			x	
Sibelgas	x	x		x

As from 1 January 2025, there will be a few changes to the Fluvius Economic Group structure. On the one hand, this is a consequence of a number of mergers between municipalities and, on the other hand, of the obligation for the individual distribution system operators for electricity and gas which are part of the Fluvius Economic Group, to conform with some requirements imposed by decree on their operating area and the minimum number of connections that they manage. These changes were coupled to a few name changes. The new situation is reflected in the table below.

	Electricity	Natural gas	Sewerage	Public lighting
Fluvius Antwerpen	x	x	x	x
Fluvius Halle-Vilvoorde	x	x		x
Fluvius Imewo	x	x		x
Fluvius Kempen	x	x		x
Fluvius Limburg	x	x	x	x
Fluvius Midden-Vlaanderen	x	x		x
Fluvius West	x	x	x	x
Fluvius Zenne-Dijle	x	x		x
Riobra			x	

Fluvius works on behalf of the intermunicipal utility companies listed in the tables above. As indicated, the majority of these mandated associations are active in the regulated activity of energy distribution (electricity and/or natural gas)<sup>1</sup>. Consequently, a substantial part of Fluvius' business is subject to regulation by the authorized energy regulator VREG (Flemish Regulator of the Electricity and Gas Market). As from 1 January 2025, VREG has been renamed Vlaamse Nutsregulator (VNR – Flemish Utility Regulator). Fluvius' sewerage business is also regulated in Flanders, namely by the VMM (Flemish Environmental Agency); this regulatory competence is expected to be transferred to VNR as from 1 January 2026.

Fluvius acts as an operating company for its shareholders/principals at cost price, i.e. no profit margin is charged on the operating tasks carried out. Every month, Fluvius charges all of its direct and indirect operating costs, investments and public service obligations (staff, contractors, suppliers, financing costs) to its shareholders/principals in full. That is why the financial statements of the operating company Fluvius System Operator close with a zero balance, with no profit or loss, with the exception of its stake in Wyre Holding bv for the business in public electronic communication networks.

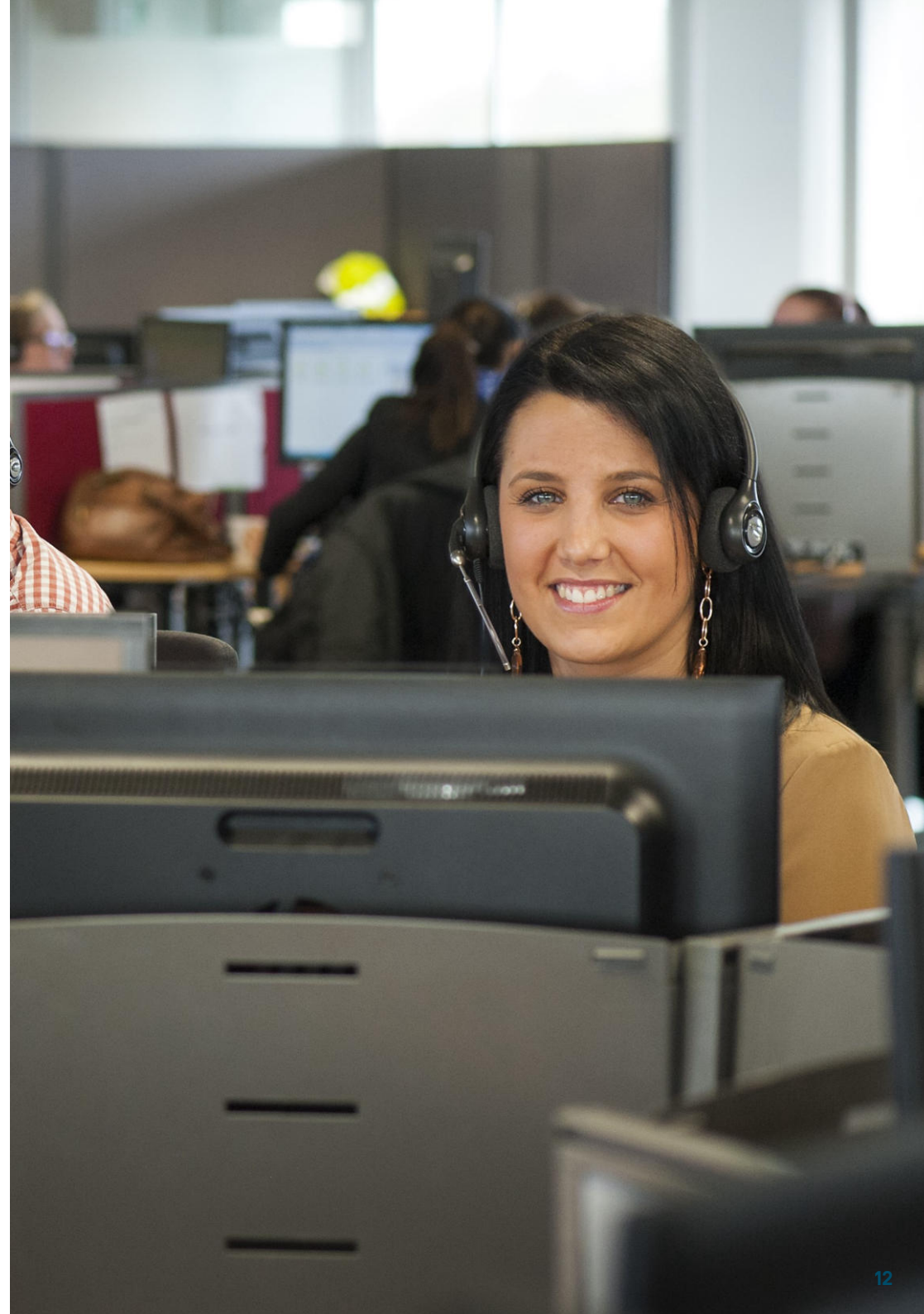
Fluvius System Operator does not own the distribution infrastructure (distribution grids with cables and pipelines, substations, measurement infrastructure etc.). the various mandated associations are the owners of this infrastructure.

<sup>1</sup> The intermunicipal utility companies active in electricity and natural gas are also active in district heating.

## Supported by 4 subsidiaries and associates

Fluvius System Operator relies on a number of subsidiaries and associates to carry out part of its remit:

- **De Stroomlijn cv:** the customer communication centre that handles calls from our end customers
- **Atrias cv:** the federal clearing house platform for the energy sector in Belgium
- **Synductis cv:** the company for coordination and synergy for infrastructure works carried out by utility companies in the public domain
- **Wyre Holding bv:** a holding company, with Fluvius System Operator and Telenet bv as shareholders, which owns 100% of Wyre bv, an independent self-financing infrastructure company incorporated in the context of the planned realisation by Fluvius System Operator and Telenet of a high-speed data network for the Flemish Region



# Our mission, vision, strategy and values

The mission, vision and values of Fluvius give our company direction. We embody them in our interactions with all of our shareholders, employees, customers and partners.

## Our mission

**To sustainably connect society through our multi-utility networks.**

Fluvius connects society. This involves not only the physical connection that we make via our networks. We also bring people together. And Fluvius is there for everybody.

We connect in a sustainable way. We work for the long term, and we want to contribute to a better environment and climate. And we support communities with forward-looking solutions that also provide comfort in the long term.

Fluvius aims at a wide range of utilities ('multi-utility'). Because we believe in the synergies and economies of scale this creates for all partners and customers of our company.

## Our vision

**Fluvius wants to co-realize the energy transition and climate adaptation for Flanders in active partnerships.**

Fluvius wants to be a key player in the energy transition and climate adaptation. In order to bring about these two enormous changes in Flanders, we build 'tomorrow's networks'. Our forward-looking utility solutions and systems make sure that we will be able to live here comfortably tomorrow and the day after tomorrow.

We are not alone in doing so. We join forces with all cities, municipalities, customers, partners, suppliers and investors. Cooperation is key. Also beyond networks. Because together we can realize more. The result? More efficiency and a better service for our customers. Because at Fluvius the customer takes the centre stage. Every day we are working for a smooth and reliable service.

For that service, we are counting upon the competence and sense of responsibility of our employees. We offer them an enjoyable working environment in which everyone can feel at ease, partly thanks to shared leadership and a culture of trust.

## Our values

With all colleagues at Fluvius, we strive towards a culture in which trust, shared leadership and the Fluvius values are in focus. These values are summarized by the [Dutch] acronym 'STERK':

- **Together ('Samen'):** we reinforce each other, to achieve our goal together and as one team.
- **Proud ('Trots'):** we put safety and quality first, and we are proud of that. We seize new opportunities and ideas with both hands.
- **Commitment ('Engagement'):** as true Fluvius ambassadors, we take full responsibility.
- **Respect:** we value each other's opinions and feedback and use them to grow together.
- **Customer centric ('Klant centraal'):** satisfied customers are our biggest driver.



## Strategic choices of core tasks

Fluvius has based its operation on the following strategic choice, as regards its core tasks: *'Fluvius wants to be the multi-utility operator of (public) grids in the public domain, to maximise synergy.'* This strategic choice applies to 3 sectors:

- Energy (electricity, gas and heat)
- Public lighting (street lights, lighting of public places and monuments, light-as-a-service)
- Water (sewerage and/or drinking water), if local opportunities arise

The activities mentioned above also include setting up and managing the necessary data platforms that are directly connected to the various utilities.

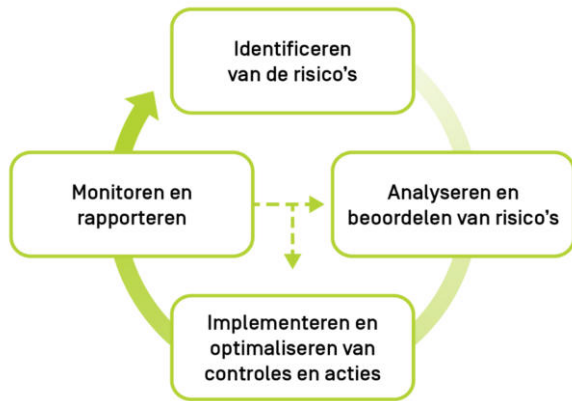
In addition, Fluvius is responsible for the public service obligations imposed on it.

We point out that the Flemish Government has decided, by way of an amendment to the Energy Decree<sup>1</sup>, to phase out Fluvius's service to the local authorities relating to energy services. Municipal authorities could call upon Fluvius for specific projects in municipal buildings, such as relighting, renovations of heating systems, insulation projects, installation of solar panels, etc. This activity was regulated by framework agreements between the individual municipalities and Fluvius. The phase-out means in practice that the Flemish local authorities could call upon Fluvius for new projects under the existing framework agreements until the end of 2024. Ongoing projects, i.e. projects that were started on 31 December 2024 at the latest, are finalized by end 2027. The relevant framework agreements with the municipalities have been cancelled in 2024 to implement the decision by the Flemish Government.

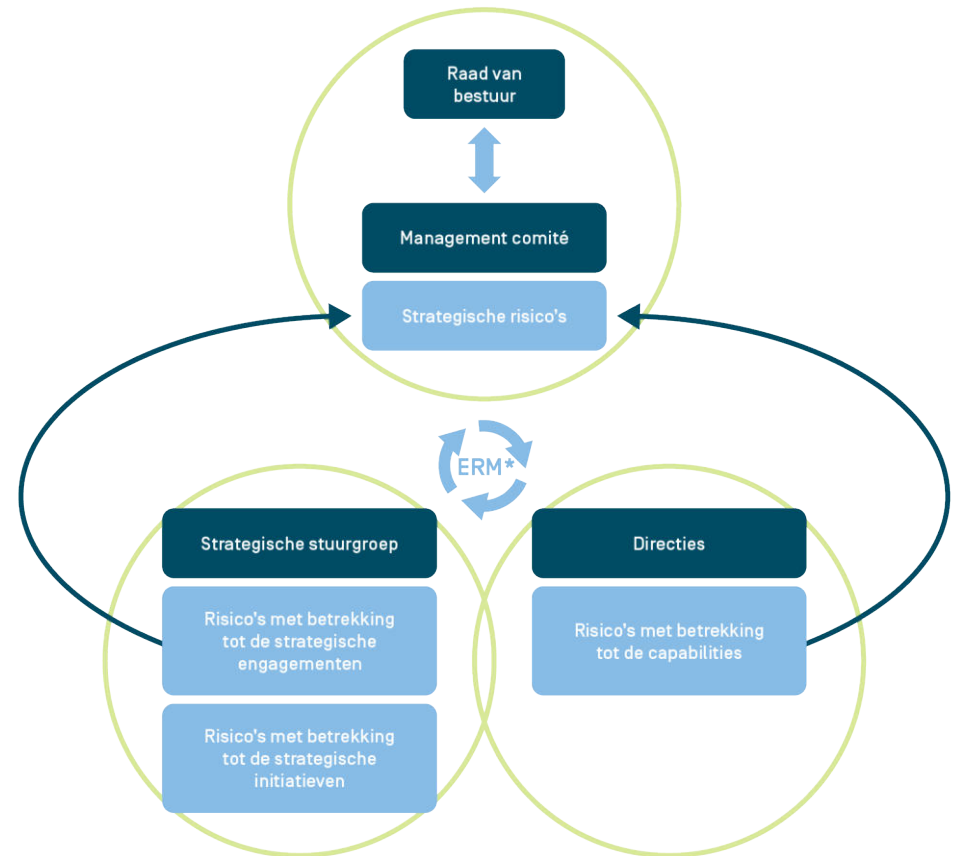
<sup>1</sup> Amending Decree of 27 October 2023 and article 4.18/1 of the Energy Decree as a consequence of the transposition of the 4th European Electricity Directive.

## Risk management

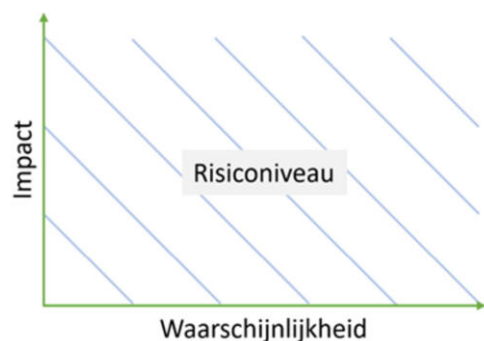
As any other company, Fluvius is confronted with uncertainties, dependencies and risks. That is why Fluvius has rolled out a risk management system in which potential risks concerning all managerial aspects are tackled in a structured way through the 'integral risk management' method. Continuous monitoring and a range of procedures should help to maximally manage the uncertainties and risks. The risk management cycle consist of four parts:



Besides, for the different kinds of risk the appropriate roles and responsibilities have been assigned. These risk owners and risk managers are required to carry out a risk exercise with the appropriate frequency (at least once a year), with the facilitation of risk coordinators. They also have to safeguard the completeness and correctness of the risks for which they are responsible. Reporting takes place at the appropriate organizational level and with the appropriate frequency.



As mentioned, risk assessments are carried out. Here the aim is a.o. to determine whether managerial measures are needed? Based on impact and probability, the risk is set out on the Fluvius ERM risk matrix<sup>1</sup>. This matrix is being used for all types of risks in function of the comparability and priority-setting of measures. After an evaluation of the net risk (taking into account mitigating measures already in place) a risk level is set. These levels are scaled, taking into account the realization of the company's objectives, the need for a quick budgeting and implementation of actions and the time horizon in which mitigating measures can have an impact on the risk level.



The strategic risks, by definition, have a major impact on Fluvius' vision, mission and strategy. The entire Management Committee is the risk owner, and will frequently provide feedback to the Board of Directors as the ultimate risk responsible entity. The department Risk Management, within the Strategy Direction, facilitates the risk management cycle for strategic risks as the risk coordinator. This involves interviews with stakeholders to identify the risks.

The strategic risks thus identified are about stakeholder management, market evolutions, financial aspects, cyber security, technical challenges and the impact of climate change. Next, we need a sufficient number of the right profiles, both within and outside of Fluvius, to realize the energy and climate transition.

In this report, the transition from Enterprise Risk Management to IRO management (impacts, risks and opportunities), the risks related to the sustainability reporting and the financial risks are commented upon.

Next to a risk management framework, Fluvius also has a business continuity framework. Business continuity offers a structured approach following unexpected big impact events and provides to conserve (material and non-material) values of Fluvius from important negative impacts following a big impact event. The framework is complementary to existing emergency planning procedures, that are initially focussed on continuity of energy supply towards our customers. Business continuity ensures the design, implementation, evaluation and improvement of the necessary capacity to handle big impact events in a correct manner and to recover from it within the set objectives. The build-up of this capacity is based on a balanced approach of:

- Prevention (to prevent where feasible)
- Response (controlling impacts)
- Recover (minimum service recovery within set time frames)

More information can be found in our [Charter for Business Continuity Management \(BCM\)](#).

<sup>1</sup> ERM: Enterprise Risk Management



# Report by the Board of Directors

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# Shareholder and group structure of Fluvius System operator cv

## Shareholder structure

The table below presents the shareholder structure of Fluvius System Operator at 31 December 2024. This share allocation is primarily based on the criterion 'number of EANs<sup>1</sup> per shareholder. The shareholding was adapted after the closing of the financial year due to the structural changes as highlighted in [Structural changes as from 1 January 2025](#). At 31 December 2024, the shareholding was as follows:

### Shares with voting rights

Fluvius System Operator	Quantity	% in Fluvius
Fluvius Antwerp	4,927,882	18.31%
Fluvius Limburg	5,046,808	18.75%
Fluvius West	1,578,274	5.86%
Gaselwest	2,711,673	10.08%
Imewo	3,798,172	14.11%
Intergem	1,853,953	6.89%
Iveka	1,580,224	5.87%
Iverlek	3,508,983	13.04%
PBE	1,011,018	3.76%
Riobra	394,394	1.47%
Sibelgas	499,554	1.86%
<b>Total</b>	<b>26,910,935</b>	<b>100%</b>

## Consolidation scope

The consolidation scope of the Fluvius Group for the financial year 2024 according to the Belgian accounting standards is presented in the table below. Fluvius System Operator is in each case the consolidating entity.

Consolidated company	Consolidation method	Shareholding of Fluvius System Operator
<b>De Stroomlijn cv</b> Brusselsesteenweg 199, 9090 Merelbeke-Melle	Full consolidation	62.17%
<b>Atrias cv</b> Koning Albert II-laan 37, 1030 Brussels (Schaarbeek)	Equity method	50.00%
<b>Synductis cv</b> Brusselsesteenweg 199, 9090 Merelbeke - Melle	Equity method	34.38%
<b>Wyre Holding bv</b> Liersesteenweg 4, 2800 Mechelen	Equity method	33.20%

For the sake of completeness, it should also be noted that Synductis holds a 2.99% equity stake in De Stroomlijn.

<sup>1</sup> EAN = European Article Number; one EAN corresponds to one connection for one single utility.

Furthermore, Fluvius System Operator also has a non-consolidated 4.35% equity stake in Duwolim (Duurzaam Wonen Limburg). In addition, Fluvius has a stake in the following business centres, at the request of several DSOs:

Company	DSO	% of the total number of shares
Kortrijk Business Centre	Gaselwest	24.52%
Flemish Ardennes Business Centre	Gaselwest	3.29%
Waregem Business Centre	Gaselwest	6.66%
Bruges Business Centre	Imewo	12.15% <sup>1</sup>
De Punt Business Centre	Imewo	5.87%

<sup>1</sup> 13,86% on the shares with voting rights

None of the companies or business centres in which Fluvius System Operator cv has an equity stake can be considered a producer or supplier of electricity or natural gas. The equity stakes held by Fluvius System Operator in the 5 above-mentioned regional business centres are not consolidated. This is because the company either has no decisive influence on policy or does not have the right to appoint a majority of the members of the board of directors.

The parent company Fluvius System Operator did not acquire any additional shares in subsidiaries or associated companies during 2024. The subsidiaries and associated companies did not acquire any shares in their parent company either.

## Branches

Fluvius does not have any branches.

## Articles of association

The articles of association of Fluvius System Operator were not amended during 2024. The current articles of association were approved at the Extraordinary General Meeting of Shareholders on 23 June 2023. Publication in the Annexes to the Belgian Official Journal followed on 19 July 2023.

## Changes in the operating area and structure of the Fluvius Economic Group

In 2024, no changes were made to the operating area, nor the structure of the Fluvius Economic Group.

## Participations and collaborations

### Wyre

Fluvius has signed two agreements with Wyre, the subsidiary of Wyre Holding in which Fluvius itself is participating for 33.20%. The first agreement is about Wyre's access to Fluvius infrastructure such as substations, switching stations, offices etc. The second agreement is about mixed-use (electricity and telecom) street boxes within the operating area of the DSO PBE. All arrangements needed for the smooth operations of both contracting parties have been made and the necessary guarantees related to the safety and well-being legislation and cybersecurity have been established

Besides, the so-called 'Wyre Charter' has been established. This document contains a number of detailed measures on information sharing between Fluvius and Wyre. All relevant 'firewall' processes have been defined to avoid that information on Fluvius' grid operations is shared with Wyre. These measures are the result of the binding commitment taken by Fluvius vis-à-vis the Belgian Competition Authority (BMA) at the occasion of the establishment of Wyre; these measures were aimed at countering the hypothetical objections that might arise about the role of Fluvius System Operator as a Wyre shareholder (through its participation in Wyre Holding).

### Participations in Publi-T and Publigas

At the end of 2024, six mandated associations from the Fluvius group<sup>1</sup> are participating in Publi-T cv. Publi-T is the reference shareholder (with a 44.79% participation) in the transmission grid operator Elia. Five of these mandated associations<sup>2</sup> are also participating in Publigas cv. Publigas is the 77.40% majority shareholder in the gas transport company Fluxys.

The daily management of these participations in Publi-T and Publigas has been entrusted to the financial department at Fluvius System Operator, as part of the latter's general management tasks for the account of its mandated associations/shareholders. The strategic importance of these participations is quite substantial, not only for the country's security of supply, but also with a view to the realization of the energy transition.

For the mandated associations participating in Publi-T and/or Publigas, the financial aspects of these participations are important. To be concrete, the associations participating in Publigas received a dividend of 31.61 million euro. In 2024, Publi-T paid out an aggregate dividend of 17.82 million euro to the associations still participating in Publi-T. For 2023, this dividend was 25.10 million euro.

In 2024, both of these participations have been reorganized. This reorganization should maintain the municipal control over and the strategic anchoring of Elia and Fluxys. And it should allow both holdings to respond to the equity need that arises in transmission grid operations and the gas transport company due to the challenges posed by the energy transition. To be precise, the DSOs Fluvius Limburg, PBE and Fluvius West have sold their Publi-T shares to, on the one hand, the Flemish Energy Holding (VEH) and, on the other, to the entities Nuhma, Creadiv and Efin, all of which are participating in VEH.

A second reorganization was the creation of Transco Energy. The DSOs Fluvius Antwerpen, Gaselwest, Imewo, Iverlek and Intergem have co-established this company. The insurer Ethias and Participation Company Flanders (PMV) have joined Transco Energy as well. The aim is that other third parties can join Transco energy. At first instance, Transco Energy has been set up as a provisional entity, the economic contribution by the different partners is foreseen in the second stage.

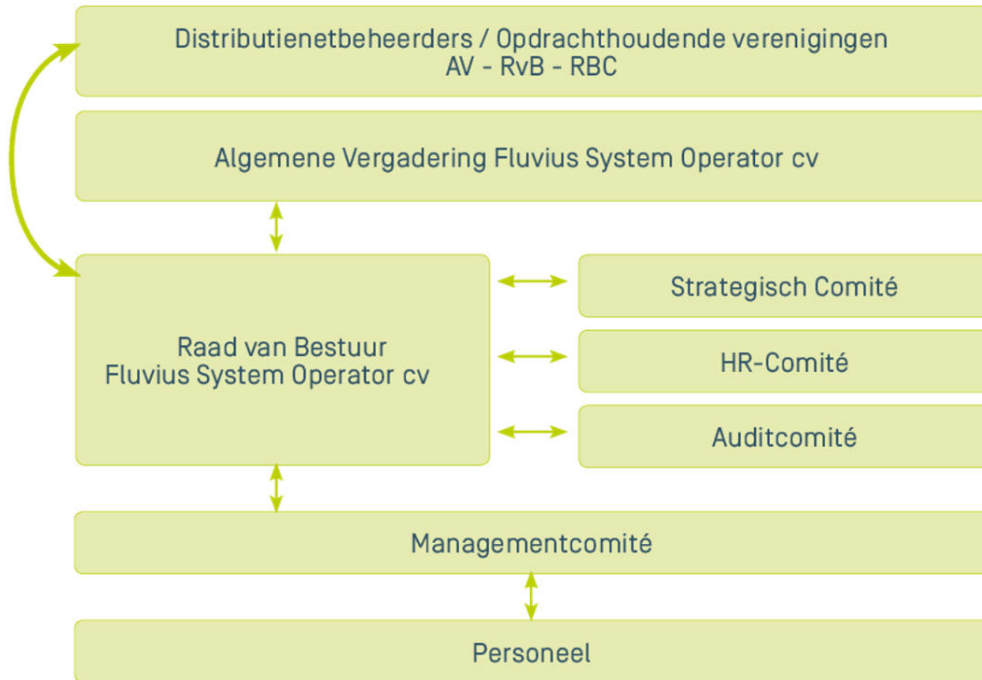
We also mention the establishment of NextGrid Holding, the controlling holding in which Publi-T and Fluxys will manage their shares in the transmission system operator Elia. In this new structure, Publi-T will remain Elia's reference shareholder, with Fluxys as a minority shareholder. The partnership between Publi-T and Fluxys should allow to fund future capital increases at Elia and to safeguard the municipal stake in the electricity sector.

<sup>1</sup> These are: Fluvius Antwerpen, Gaselwest, Imewo, Intergem, Iveka and Iverlek.

<sup>2</sup> These are: Fluvius Antwerpen, Gaselwest, Imewo, Intergem and Iverlek.

# Composition of governing bodies and management

Below an overview (as per 31 December 2024) of the different governing bodies within the Fluvius Economic Group and their relationships to each other is presented. The structure in which the various management and supervisory bodies of Fluvius are organised is in full compliance with all applicable legal (including in particular company law), decree and regulatory requirements.



## Board of Directors

The composition of the Board of Directors of Fluvius System Operator as of 31 December 2024 was as follows:

Name	Role	Nominated by	Number of meetings attended in 2024	Public mandate
Wim Dries	Chair	Fluvius Limburg	11	Mayor
Koen Kennis	1st Deputy Chair	Fluvius Antwerpen	8	Alderman
Christophe Peeters	2nd Deputy Chair	Imewo	9	Alderman
Jean-Pierre De Groef <sup>1</sup>	3rd Deputy Chair	Sibelgas	4	Mayor
Piet Buyse	Director	Intergem	10	
Geert Cluckers	Director	PBE	11	Mayor
Lieven Cobbaert	Director	Gaselwest	8	Mayor
David Coppens	Director	Intergem	9	Chairman of municipal council
Jan Dalemans	Director	Fluvius Limburg	9	Mayor
Charlotte De Backer	Director	Imewo	9	Member of the municipal council
Christof Dejaegher	Director	Gaselwest	10	Mayor
Jan Desmeth	Director	Iverlek	10	Mayor
Kim Dorikens <sup>2</sup>	Director	Fluvius Antwerpen	5	Alderman
Ine Franssen	Director	Fluvius Limburg	11	Alderman
Greet Geypen	Director	Iverlek	10	Alderman
Tom Kersemans	Director	Iveka	7	Alderman
Lies Laridon	Director	Fluvius West	11	
Nicky Martens	Director	Riobra	11	Member of the municipal council
Adinda Van Gerven	Director	Fluvius Antwerpen	11	Acting mayor
Guy Van de Perre	Director	Iveka	11	Alderman

<sup>1</sup> Member from 25/09/24

<sup>2</sup> Member from 26/06/24

## Changes

The following changes took place in 2024. Ms. Kim Dorikens was appointed as director, nominated by Fluvius Antwerpen, to fill in a vacant mandate since the resignation of Ms. Kristien Vingerhoets. Mr Jean-Pierre De Groef was appointed on behalf of Sibelgas to replace Mr Hans Bonte, who had to resign due to legal incompatibility after being elected a member of the Flemish Parliament. The Board also elected Mr De Groef as its 3<sup>rd</sup> vice-chairman. Mr Piet Buyse, who was already a member of the Board, is in function since 1 January 2024 on the basis of expertise.

Bruce Almey is the secretary of the Board of Directors.

### Composition

2024

Gender diversity (% women in relation to number of members)	35%
Global presence	89%
Independent directors <sup>1</sup>	100%

<sup>1</sup> In compliance with Energy Decree

All mandates of directors will automatically expire at the General Meeting of Shareholders to be held in the first quarter of 2025. These mandates can be renewed.

The Chair of the Board of Directors has no operational management responsibilities within the company. This is also the case for the Deputy Chairs and all other members of the Board of Directors.

## Guaranteed independence

The Board of Directors of Fluvius System Operator has no independent directors within the meaning of article 7:87d of the Companies and Associations Code. All Fluvius directors, however, are independent according to the criteria in the Flemish Energy Decree of 19 November 2010 (as amended), more particularly article 1.1.1.§2,74°. The Energy Decree wants to ensure that the distribution system operators and their operating company are independent and operate independently from the other market parties (energy suppliers, producers and importers of energy) in a liberalized energy market. The directors of Fluvius System Operator declare on honour – at the beginning of their mandate – that they fully comply with all conditions of independence. At the request of the energy regulator, this declaration will be renewed each year as from 2024.

All directors are – indirectly through the mandated associations/shareholders – appointed by the municipal administrations. This guarantees that the local authorities have a say in those activities of Fluvius that have a direct impact on the local authorities themselves and their population.

The Board of Directors and the management are strictly separated at Fluvius System Operator. For example, the CEO and the other members of the Management Committee are not members of the Board of Directors.

Article 6:64 of the Companies and Associations Code provides for a specific procedure within the Board of Directors in the event of a possible direct or indirect conflict of interest of a financial nature in respect of a director, where there is a conflict with a decision or a transaction falling under the competence of the Board of Directors of the company. This legal provision was not to be applied in 2024.

## Audit Committee

In accordance with article 24.B of the articles of association, the Board of Directors of Fluvius System Operator has set up an Audit Committee. Its members were as follows on 31 December 2024:

Name	Role	Number of meetings attended in 2024
Jan Desmeth	Chair	6
Lieven Cobbaert	Member	6
Kim Dorikens <sup>1</sup>	Member	1
Lies Laridon	Member	6

<sup>1</sup> Member from 26/06/24

The Audit Committee met 6 times in the course of 2024.

Composition	2024
Gender diversity (% women in relation to number of members)	50%
Global presence	90%

The most important matters handled by the Audit Committee were the results of the internal audits, the audit plan and financial reporting.

The Audit Committee reports on its findings to the Board of Directors.

## HR Committee

As stipulated in the articles of association (article 24.C) the Board of Directors of Fluvius System Operator has also set up an HR Committee. Its members were as follows on 31 December 2024:

Name	Role	Number of meetings attended in 2024
Greet Geypen	Chair	5
Piet Buysse	Member	5
Kim Dorikens <sup>1</sup>	Member	2
Adinda Van Gerven	Member	5

<sup>1</sup> Member from 26/06/24

The HR Committee met 5 times in 2024.

Composition	2024
Gender diversity (% women in relation to number of members)	75%
Global presence	100%

Under the articles of association, the HR Committee's task is to monitor developments in the HR policy of Fluvius System Operator and make recommendations to the Board of Directors. The HR Committee also reports directly to the Board of Directors.

Among other things, the committee discussed long-term management incentives, pension funds, recruitment, the CLA-90 (collective labour agreement which offers employees non-recurrent result-related benefits), social consultation and the organisation.



## Strategic Committee

The Strategic Committee consisted of the following persons as of the end of December 2024:

Name	Role	Number of meetings attended in 2024
Wim Dries	Chair	6
Piet Buyse	Member	6
David Coppens	Member	3
Jean-Pierre De Groef <sup>1</sup>	Member	0
Koen Kennis	Member	4
Christophe Peeters	Member	5

<sup>1</sup> Member from 25/09/24

In 2024, the Strategic Committee met 6 times.

Composition	2024
Gender diversity (% women in relation to number of members)	0%
Global presence	79%

The articles of association of the company stipulate that the Chair of the Board of Directors is ex officio also the Chair of the Strategic Committee (article 24.D of the articles of association).

The Strategic Committee outlines the general strategy for Fluvius System Operator and the entire Fluvius Economic Group. In this regard, there is a special focus on the company's relationship with the authorities and regulators, with shareholders and with the other stakeholders within the grid management in Flanders.

In 2024, the Strategic Committee discussed a number of strategic topics, with special attention for the project of [Towards a reinforcement of Fluvius Economic Group equity?](#)

The Strategic Committee reports to the Board of Directors.

## Executive Committee

Article 24.A of the articles of association of Fluvius stipulates that, if the Board of Directors is not wholly composed of independent directors, it shall set up an Executive Committee within the Board. The members of the Executive Committee must all be independent directors within the meaning of Article 1.1.1. §2, 74° of the Flemish Energy Decree of 19 November 2010. They are appointed by the Board of Directors from among its members. To date, the provision regarding the Executive Committee contained in article 24.A has had no effect in practice, since all the directors of the business are always independent directors. Pursuant to article 3.1.28 para. 3 of the Energy Decree, Fluvius is therefore not required to set up such a body.

## Management Committee

Day-to-day management of Fluvius is entrusted to the Management Committee, see also article 26 of the company's articles of association.

The composition of the Management Committee of Fluvius System Operator between 1 January 2024 until 31 December 2024 remained unchanged as follows:

Name	Role
Frank Vanbrabant	CEO
Raf Bellers	Director Network Management
Tom Ceuppens	Director Network Operations
Guy Cosyns	Director Customer service & Data management
Jean Pierre Hollevoet	Director of Energy & Climate transition
David Termont	Director financial Management, Legal & IT
Ilse Van Belle	Director HR
Filip Van Rompaey	Director Strategy

In view of the forthcoming retirement of Mr Jean Pierre Hollevoet, director Energy & Climate Transition, Mr Hollevoet will no longer be a member of the Management Committee as from 1 January 2025. Mr Van Rompaey will take over the responsibilities for the Department Energy & Climate Transition from that date.

Composition	2024
Gender diversity (% women in relation to number of members)	12.5%

The CEO attends the meetings of the Board of Directors ex officio but does not have voting rights. Other members of the Management Committee may also attend meetings of the Board of Directors if it is appropriate in view of the matters on the agenda. They also have no voting rights on the Board of Directors. The Management Committee generally meets every week.





## Governing bodies of the consolidated companies

### Board of Directors De Stroomlijn

Name	Role
David Termont	Chair
Marleen Porto-Carrero	Deputy chair
Guy Cosyns	Director
Tom Devos	Director
Johan Verbauwhede	Director
Sammy Wuyts	Director
Ine Godefroid	Observer
Luc Van Ammel	General Director

# Remuneration Report

**In accordance with article 3:6 §3 of the Companies and Associations Code, the information on the remuneration of the company's Board of Directors is presented below. We also give information on the remuneration for the Management Committee's members.**

## Board of Directors

The remuneration of the company's directors is based on the highest compensation that can be paid out to a municipal councillor in Flanders. For the financial year 2024, this attendance fee ('session allowance') was €254.95 per session actually attended, regardless of whether the meeting was physical or online. This amount represents an indexation compared to the amount of €249.95 that was applicable until 31 December 2023. The travel allowance paid to directors for travelling to and from the venue for physical meetings of the Board of Directors (and other governing bodies) was 42 euro cents per km in 2024.

In 2024, the Fluvius System Operator Board of Directors met eleven times, of which four online meetings and one written meeting.

The table on the next page shows for each director the amounts for the calendar year 2024 paid to them as attendance and travel allowances. The corresponding amounts for 2023 are also listed for comparison.

Please take into account the following remarks for the correct interpretation of this table:

- the totals shown for each director are gross taxable amounts;
- the amounts shown are the total amounts paid to the directors concerned, including any amounts to which they were entitled from their additional mandates (such as in the Audit Committee, HR Committee and/or Strategic Committee).

Other than the amounts shown above, no additional benefits were awarded or paid to the directors either in cash or in kind during or in relation to financial year 2024.

## Remuneration Board of Directors

	2023			2024		
	Attendance fee	Travel allowance	Total	Attendance fee	Travel allowance	Total
Bonte Hans <sup>1</sup>	€ 3,427.15	€ 114.24	<b>€ 3,541.39</b>	€ 1,789.75	€ 47.88	<b>€ 1,837.63</b>
Buyse Piet	€ 2,661.71	€ 245.60	<b>€ 2,907.31</b>	€ 3,030.09	€ 226.80	<b>€ 3,256.89</b>
Cluckers Geert	€ 2,249.55	€ 459.48	<b>€ 2,709.03</b>	€ 2,835.05	€ 294.00	<b>€ 3,129.05</b>
Cobbaert Lieven	€ 3,177.20	€ 641.80	<b>€ 3,819.00</b>	€ 3,610.10	€ 387.24	<b>€ 3,997.34</b>
Coppens David	€ 2,691.73	€ 149.44	<b>€ 2,841.17</b>	€ 3,095.10	€ 118.44	<b>€ 3,213.54</b>
Dalemans Jan	€ 2,249.55	€ 602.00	<b>€ 2,851.55</b>	€ 2,320.05	€ 169.68	<b>€ 2,489.73</b>
De Backer Charlotte	€ 1,999.60	€ 656.72	<b>€ 2,656.32</b>	€ 2,325.15	€ 390.60	<b>€ 2,715.75</b>
De Groef Jean-Pierre	€ -	€ -	<b>€ -</b>	€ 1,040.20	€ 10.92	<b>€ 1,051.12</b>
Dejaegher Christof	€ 1,999.60	€ 753.68	<b>€ 2,753.28</b>	€ 2,580.10	€ 573.72	<b>€ 3,153.82</b>
Dorikens Kim	€ -	€ -	<b>€ -</b>	€ 1,560.31	€ 104.16	<b>€ 1,664.47</b>
Desmeth Jan	€ 3,191.63	€ 95.16	<b>€ 3,286.79</b>	€ 4,125.10	€ 57.96	<b>€ 4,183.06</b>
Dries Wim	€ 3,677.10	€ -	<b>€ 3,677.10</b>	€ 4,125.10	€ -	<b>€ 4,125.10</b>
Franssen Ine	€ 1,999.60	€ 686.40	<b>€ 2,686.00</b>	€ 2,835.05	€ 531.72	<b>€ 3,366.77</b>
Geypen Greet	€ 2,588.40	€ 169.76	<b>€ 2,758.16</b>	€ 3,217.50	€ 122.64	<b>€ 3,340.14</b>
Kennis Koen	€ 2,642.10	€ 313.92	<b>€ 2,956.02</b>	€ 2,320.04	€ 199.92	<b>€ 2,519.96</b>
Kerseman Tom	€ 749.85	€ 207.40	<b>€ 957.25</b>	€ 1,799.95	€ 142.80	<b>€ 1,942.75</b>
Laridon Lies	€ 3,427.15	€ 840.52	<b>€ 4,267.67</b>	€ 4,380.05	€ 660.24	<b>€ 5,040.29</b>
Martens Nicky	€ 1,749.65	€ 259.20	<b>€ 2,008.85</b>	€ 2,835.05	€ 221.76	<b>€ 3,056.81</b>
Peeters Christophe	€ 2,338.45	€ 301.28	<b>€ 2,639.73</b>	€ 2,837.62	€ 282.24	<b>€ 3,119.86</b>
Van De Perre Guy	€ 1,749.65	€ 462.12	<b>€ 2,211.77</b>	€ 2,835.05	€ 393.96	<b>€ 3,229.01</b>
Van Gerven Adinda	€ 3,427.15	€ 442.44	<b>€ 3,869.59</b>	€ 4,120.00	€ 281.40	<b>€ 4,401.40</b>
<b>Total</b>	<b>€ 47,996.82</b>	<b>€ 6,496.60</b>	<b>€ 49,316.62</b>	<b>€ 52,661.36</b>	<b>€ 4,542.72</b>	<b>€ 57,204.08</b>

<sup>1</sup> Hans Bonte was a member of the Board of Directors and the Strategic Committee until 02/07/24

## Management Committee

To protect the privacy of the persons concerned, the company does not publish details of the performance of individual Management Committee members, and consequently does not provide details of the associated remuneration.

The total gross salary cost for 2024 for the members of the Management Committee was € 3,786,866.37. The comparable gross salary cost for 2023 was € 4,016,560.56. This gross wage cost consists of three components: (a) basic annual salary, i.e. gross salary, including holiday allowance and year-end bonus, before deduction of payroll taxes and social security contributions, (b) performance-based variable remuneration and (c) employer's pension costs, which totalled in 2024 € 211,409.74 (2023: € 234,816.96).

Basic salaries are based on the internationally recognised Hay method, the results of which are consistent with the Belgian market. Compensation paid to members of the Management Committee is approved by the shareholders in the appropriate governing bodies. The variable remuneration paid to members of the Management Committee is linked to the company's score on a number of carefully selected performance indicators. The evaluation of members of the Management Committee is validated every year within the relevant governing bodies. In this way, the company aims to strengthen the long-term perspective in the policy and foster continuity.

A set of long-term indicators covering the various areas of company management is used for the performance-based part of the Management Committee compensation:

- The completion of energy and climate transition investment plans
- The completion of the LED conversion for public lighting infrastructure
- The completion of the roadmap data 2025, aligned with the Flemish Energy and Climate Policy
- The completion of partnerships within the water sector in order to obtain more efficiency and the challenges in climate adaptation
- Great Place To Work score
- Safety results
- Staff absenteeism rate
- Customer satisfaction
- Customer centric
- Timely execution of core activities
- Performance of the networks
- Controlling ESG risks
- Sustainably managing financial policy a.o. cash flow and financing the energy and climate transition on the long term

The group of executives can also earn a results-related bonus (CLA 90) if overall results determined in advance are achieved. Customer satisfaction, the number of kilometres driven for company-related travel, and the number of kilometres driven with leased vehicles fall under this list.

# Financing of Fluvius

## VAT unit

The VAT unit 'Fluvius Economic Group' includes Fluvius System Operator cv and subsidiary De Stroomlijn and associate Synductis. Fluvius System Operator cv acts as the representative for this VAT unit.

## Cash pooling

Various entities in the Fluvius Economic Group are participating in a cash pooling system. Within this system, cash surpluses and shortfalls are mutually offset on a daily basis within a combined cash pool at the bank. This system is more beneficial for the participants overall than if they were each to maintain separate cash accounts. The members of the Fluvius cash pool are the operating company Fluvius System Operator itself, Fluvius OV, its subsidiary De Stroomlijn, its associate Synductis, and the 11 mandated associations/shareholders.

## Financing Fluvius System Operator

Fluvius System Operator offers securities to the public. The relevant laws and regulations therefore apply. Fluvius therefore complies with market abuse regulations.

The mandated associations/shareholders are guaranteeing the bonds and related debt instruments issued by their operating company Fluvius System Operator (and in the past its predecessors Eandis System Operator and Infrac). These debt instruments are listed on the following stock exchanges:

- Luxembourg Stock Exchange – regulated market
- Euronext Brussels – regulated market
- Euronext Growth Brussels – non-regulated market
- Open Market Frankfurt ('Freiverkehr') – non-regulated market

In 2020, Fluvius introduced a Euro Medium Term Note (EMTN) programme for the issue of internationally issued bonds. The FSMA, as the competent financial regulator, approved the original base prospectus for this EMTN programme on 17 November 2020. The FSMA approved the most

recent version of the EMTN base prospectus on 6 June 2023. The FSMA approved supplements to this prospectus on 20 December 2023 and 16 April 2024.

Under this EMTN programme, Fluvius issued an institutional bond on 2 May 2024. This transaction raised an amount of 700 million euro with a ten-year maturity (until 2 May 2034). The fixed annual coupon was set at 3.875%.

There were no outstanding bonds that came to maturity in 2024.

Next, on 22 January 2024, Fluvius drew an amount of 198 million euro under a loan facility at the European Investment bank (EIB). The fixed interest rate was 3.103%. This loan facility can be used by Fluvius for financing the roll-out of the digital electricity meter. After this transaction, the non-drawn remainder of this facility is 27 million euro.

Finally, the Fluvius Economic Group granted bank loans for an amount of 500 million euro. This amount was drawn on 9 December 2024. Two banks realized this financing transaction, each for an amount of 250 million euro. Fluvius opted for maturities of 5 years (50 million euro), 10 years (150 million euro), 15 years (50 million euro) and 20 years (250 million euro). A five-year reviewable interest rate was agreed upon, with the exception of a fixed interest rate for an amount of 50 million euro on a five-year maturity.

The EMTN programme for bond issuances with a maximum issuance amount, discussed above, was almost entirely used up after the May 2024 issue. Therefore Fluvius decided to renew and expand the programme. With a view to the substantial financing needs of the Fluvius Economic Group, estimated at 14 billion euro on a ten-year period, Fluvius recognized the need for a large flexibility and diversity of financing means, as well as the broadest possible investor base. It was decided to raise the maximum amount of the EMTN programme to 10 billion euro. For issuances under this programme, Fluvius will call upon a banking pool. For the time being, this banking pool consist of six nationally and internationally renowned banks. They will act as 'dealers'. Fluvius also decided that future EMTN bonds will be listed on the non-regulated market Euronext Growth Brussels.

To appeal to an even broader base of bond investors, Fluvius has also decided to set up a so-called USPP programme. USPP stands for United States Private Placements. The USPP market



is a US private bond market in which mainly US pension funds and insurers operate. This new programme has a size of 1 billion euro and runs over a period of five years. Fluvius intends to issue USPPs only when conditions, including the euro/dollar exchange rate, are competitive with EMTN issues. For each USPP transaction, the investor(s) and bank(s) to be partnered with will be identified.

Fluvius has also renewed its cooperation with its legal advisor on financing transactions in 2024.

In order to appeal to a broader fixed income investor base Fluvius once again completely updated its existing Green Financing Framework. The Board of Directors of Fluvius System Operator approved this renewed framework on 23 October 2024. The update took into account changes in market practices, legislation and regulation.

In its Green Financing Framework, Fluvius indicates that the proceeds of green financing instruments can be used for financing and refinancing these purposes: green infrastructure (electricity distribution, distribution of renewable gases and/or low-carbon gases), energy efficiency (district heating grids, energy efficient lighting) and sustainable water and waste water management. Additionally, the Framework describes how the allocation of the proceeds will take place, and how reporting on both the allocation and the impact will be done.

The independent external validation of the Fluvius Green Financing Framework in the form of a so-called 'Second party Opinion – SPO' was delivered by the specialized agency Sustainable Fitch on 9 December 2024. The overall score by Sustainable Fitch for the Fluvius Green Financing Framework is 'excellent', with the score 'excellent' for the sections 'use of proceeds', 'evaluation and selection' and 'reporting and transparency'; the sections 'use of proceeds – other information' and 'management of proceeds' received the score 'good'. Next Sustainable Fitch concludes in its SPO that the Fluvius Green Financing Framework and Fluvius System Operator's business activities are aligned with the ICMA<sup>1</sup> Green Bond Principles and the LMA<sup>2</sup> Green Loan Principles. Finally, Sustainable Fitch signals that green financing instruments based on Fluvius' Green Financing Framework contribute to these United Nations Sustainable Development Goals: 6 (clean water and sanitation), 7 (affordable and clean energy) and 9 (industry, innovation and infrastructure).

In 2024, Fluvius System Operator did not carry out any transactions in derivatives.

The company does not disclose any losses carried forward in its annual accounts, either in the non-consolidated or consolidated figures.

<sup>1</sup> ICMA: International Capital Markets Association

<sup>2</sup> LMA: Loan Markets Association

## The rating of Fluvius System Operator

### Moody's

Fluvius System Operator's corporate credit rating at Moody's remained at A3 for the entire year 2024. However, on 8 October 2024, Moody's changed the rating's outlook from 'stable' to 'negative'. For this outlook change, Moody's argued that they expect – without any balance sheet strengthening measures – Fluvius Economic Group's financial ratios to remain below the thresholds for the current A3 rating over the regulatory tariff period 2025-2028.

Fluvius also has a so-called CIS score at Moody's. This CIS score (i.e. credit impact score) reflects an assessment of the risks to the credit profile from environment and climate (also known as the E factor), social aspects (S factor) and governance (G factor). Fluvius' CIS score in 2024 also remained unchanged at CIS-3, with 1 as highest positive to 5 as highest negative. A score of 3 means there is moderate to negative ESG risk to Fluvius' overall credit profile, according to the rating agency. Fluvius' partial scores are: E-3, S-3, and G-2 where 2 means 'neutral to low' and 3 means 'moderately negative'.

### Creditreform

At the end of 2024, the Fluvius rating at Creditreform was 'A' with a negative outlook. This is a so-called 'unsolicited' rating, meaning that the rating agency itself assigns a rating score based on publicly available information without the active collaboration of the rated company.

## Towards a reinforcement of Fluvius Economic Group equity?

In 2024, Fluvius launched a project that investigates in what way the Fluvius Economic Group's equity can be reinforced at a moment of increasing debt. Such a reinforcement should improve the balance sheet structure, which in turn should support the corporate credit rating and ultimately benefit the Group's funding cost. A sound financial basis is a necessity, certainly in a context of a significant investment programme, so as to realize the Fluvius Economic Group's strategic objectives in the years to come.

The starting point for this analysis was a reinforcement of the equity by bringing in a foreign/ domestic private/public consortium, led by a Flemish investor, with or without the possibility of an IPO<sup>1</sup> at a later stage. The project is split up in two stages: an initial 'landscaping' phase and then an implementation phase. In the landscaping phase, all possibilities to bring in additional capital are looked into, how this can be realized, what conditions have to be fulfilled etc.

At the end of 2024 the landscaping was not yet finalized. This project will be continued during 2025.

<sup>1</sup> IPO: initial public offering



## Audit carried out by the statutory auditor, and their remuneration

The audit firm Ernst & Young Bedrijfsrevisoren BV (EY) acts as the statutory auditor of the company. EY's permanent representative is Mr Marnix Van Dooren, company auditor. EY's mandate expires after the General Meeting of Shareholders in 2026 on the 2025 financial year. The terms of this audit mandate for EY include a base fee of €125,000 (excluding VAT and indexable every year) as the starting point.

This mandate for EY also covers reporting under IFRS.

During 2024, EY was paid €154,399 for performing its mandate as statutory auditor for the parent company Fluvius System Operator, supplemented by €524,352 for additional (statutory) assignments in the extension of the mandate as statutory auditor, as well as €18,900 for other assignments performed by related persons. The auditor's additional activities include limited assurance on the CSRD statements, procedures for comfort letters and the assurance on Green Bonds. All additional services were approved by the Audit Committee.

EY Bedrijfsrevisoren formally declared to the Audit Committee on 12 March 2025 that they are independent in the performance of their mandate as statutory auditor. An identical declaration of independence was submitted at the General Meeting of Shareholders on 22 May 2024.

Fluvius System Operator has also tasked the audit firm EY to report on its cash management, the valuation of the Regulatory Asset Base (RAB) and decommissioning. This mandate was also renewed by the annual meeting on 24 May 2023.

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# Key figures d.d. 31 December 2024

## Key figures financials

	31.12.2022	31.12.2023	31.12.2024
<b>Balance sheet total [in 1000 euros]</b>			
Fluvius System Operator Consolidated Group	6,889,767	8,778,893	9,249,461
Fluvius Economic Group	17,242,497	18,598,042	18,326,167
<b>Turnover [= operating income in 1000 euros]</b>			
Fluvius System Operator Consolidated Group	2,011,644	2,505,752	2,718,535
Fluvius Economic Group	3,249,064	3,749,621	2,462,815

## Key figures staff

	31.12.2022	31.12.2023	31.12.2024
<b>Contractual staff Fluvius System Operator [head count]:</b>	4,770	5,042	5,271
Executives	1,017	1,105	1,171
Non-executives	3,753	3,937	4,100
<b>Contractual staff Fluvius System Operator [FTE]:</b>	4,574.2	4,846.6	5,077.1
Executives	993.5	1,079.2	1,145.1
Non-executives	3,580.8	3,767.4	3,932.0
<b>Statutory staff Fluvius Mandated Association</b>			
Head count	667	625	592
FTE	643.8	601.4	567.4
<b>Total number of staff members Fluvius</b>			
Head count	5,437	5,667	5,863
FTE	5,218.0	5,447.9	5,644.5

## Key figures grid operations

	31.12.2022	31.12.2023	31.12.2024
<b>Natural gas</b>			
Connection points	2,355,263	2,364,869	2,377,118
Low-pressure network (km)	47,842	47,900	47,929
Medium-pressure network (km)	10,070	10,077	10,073
Total network length (km)	57,912	57,976	58,002
<b>Elektriciteit</b>			
Connection points	3,587,133	3,631,149	3,650,539
Low-voltage network (km)	88,129	89,547	91,671
Medium-voltage network (km)	47,146	47,418	47,853
High-voltage network (km)	732	734	752
Total network length (km)	136,007	137,699	140,276
<b>Public lighting</b>			
Light points	1,179,854	1,188,602	1,197,534
<b>Heating</b>			
Network length (km)	83	89	92
Connection points	2,123	2,054	3,087
Number of municipalities with Fluvius heat customers	15	15	15
<b>Sewerage</b>			
Sewer network (km)	11,899	12,433	12,755
Number of connections	658,991	684,909	702,530
Number of municipalities with Fluvius sewerage customers	86	87	87

## Key figures services

	31.12.2022	31.12.2023	31.12.2024
<b>Network Operation and Management</b>			
Realised investment budget (gross, in million euros)	1,198	1,412	1,705
Unavailability of electricity grid (number of minutes/year/customer)	25 min 16 sec	25 min 50 sec	25 min 5 sec
<b>Social public service obligations</b>			
Active meters prepaid electricity	49,070	60,373	69,637
Active meters prepaid natural gas	31,874	38,952	45,876
Charging points budget meter cards	mimimum 1 per municipality	mimimum 1 per municipality	mimimum 1 per municipality
Number of Social Supplier customers electricity	75,101	76,154	79,799
Number of Social Supplier customers natural gas	56,915	58,143	61,986
Number of installed digital meters	2,150,963	3,150,311	4,147,749
<b>Customer contacts</b>			
Number of visits to customer service centres	47,641	57,517	43,926
Number of contact center contacts	2,555,833	2,416,828	2,210,151
Average total number of visitors to the website per month	806,692	732,846	631,189
<b>Energy premiums</b>			
Number of premiums paid	92,790	132,959	63,866
Total premium amount paid (million euros)	91.15	140.38	70.56



# Major evolutions and events at Fluvius

## Tariff methodology electricity and gas for 2025-2028 & distribution grid fees electricity and gas 2025

After an intense preparation phase, the energy regulator VREG established the tariff methodology 2025-2028 for electricity and natural gas in June 2024. The tariff methodology describes in detail how the annual distribution grid fees, which are the major sources of revenue for the distribution system operators for electricity and gas, are calculated. As in the past, the new tariff methodology is valid for a four-year period.

In its premises, VREG had indicated that the distribution system operators, and their operating company Fluvius System Operator, as vital parties are facing great challenges to bring about the energy transition. The regulator is of the opinion that the grid management's quality should be maintained thanks to an efficient maintenance of the existing grids and future-oriented investment in grid expansion and grid reinforcement should take up a central position. Fluvius has always defended the view that the tariff methodology should allow for a sustainable and financially sound financing of the distribution system operators' activities. It is key – in Fluvius' view – to have market-based remuneration of the invested capital as a necessary condition for the further realization of the energy transition in Flanders through highly reliable distribution grids.

In setting the tariff methodology 2025-2028, VREG has kept a few key principles from the previous tariff methodology. For instance, the duration of the tariffication period of four years, the basic formula 'RAB<sup>1</sup> x WACC<sup>2</sup>' for determining the cost of capital, the proportion debt/equity of 60%/40% in the calculation of the weighted average cost of capital, and the trend methodology for the endogenous costs. A new element is that the allowed income is recalculated every year (instead of for the entire period of four years in the previous tariff methodology). And VREG also allows more flexibility in requesting advances at the occasion of changes in legislation or within the context of the distribution system operators' proactive investment policy.

VREG has set an equity remuneration after corporate tax of 7.37% for the year 2025. This is higher than the remuneration of 4.08% allowed in the 2021-2024 tariff methodology, but the underlying economic parameters of 2021 are difficult to compare with those of 2024. Here we should immediately note that the 7.37% allowed will be structurally lower in reality due to a host

of other measures imposed by VREG. The remuneration of 2.17% for 2025 set by VREG for the loan capital is lower than the actual interest charges of the Fluvius Economic Group. This is a consequence of VREG's theoretical but completely erroneous assumption that efficient grid operators have a fixed and linear debt profile with the same amount of new debt financing every year. This view takes absolutely no account of the real need for financing and refinancing, nor of the conditions on the international financial markets. Under the current tariff methodology, deficits in the remuneration of debt are charged to the remuneration of equity.

Next, VREG has imposed a so-called 'frontier shift' of 1.1% per year and cumulatively in the business segment electricity distribution. A frontier shift boils down to an additional cost saving. These cost savings come on top of the previous cost savings of 150 million euro imposed by VREG at the occasion of the merger of ex-Eandis and ex-Infrax into Fluvius mid-2018.

When Wyre, the joint venture of Fluvius and Telenet for the further expansion of fibre infrastructure in Flanders, was established, VREG investigated this transaction. In particular, VREG analysed the contributions into Wyre by the distribution system operators of assets such as empty ducts already installed. VREG has unilaterally increased the surplus value of these contributed assets that belonged to the regulated activity of electricity distribution. This surplus value is considered to be a regulated revenue and as such it is subtracted from the allowed grid fee.

Throughout the entire process Fluvius has contested several elements in the VREG method and the premises and parameters used by the regulator. We have at all times done so with clear and verifiable arguments. The main objection of Fluvius and the distribution system operators is that the allowed remuneration in reality does not prove to be market-conform and thus seriously hampers the DSOs in correctly delivering their operations and services. Fluvius has demonstrated that the remuneration mechanisms set by VREG in this tariff methodology endanger Fluvius' and the DSOs' investment capacities to a large degree. Even more so since these investments have to be carried out in an international context of increasing electrification. A frontier shift thus is diametrically opposed to the need for more investment in the electricity segment.

<sup>1</sup> RAB: regulatory asset base

<sup>2</sup> WACC: weighted average cost of capital

Taken into account the elements above, the Boards of Directors of Fluvius System Operator and the distribution system operators have decided to challenge in court the VREG decision on the 2025-2028 tariff methodology. Three key arguments are highlighted:

1. The equity remuneration,
2. The frontier shift cost savings in the electricity segment,
3. And the so-called Wyre surplus value.

Fluvius – on behalf of the distribution system operators – went to the Markets Court. The Markets Court is the competent court for challenging decisions taken by the regulator. In summary, Fluvius is defending the following:

- As to item 1, Fluvius is of the opinion that the way in which VREG calculates the weighted average remuneration for the cost of capital (i.e. the remuneration used for equity and debt) contains methodological errors and is insufficient for the distribution system operators to carry out their obligatory tasks. To replace the supposed linear profile for historical debts, Fluvius is proposing the use of a weighted average of the actual debt, which better reflects the actual situation
- For item 2, Fluvius argues that imposing an annual and cumulative frontier shift saving is a completely wrong incentive at a time when the grid operators have to carry out substantial investments to tackle the socially accepted challenges (electrification).
- Finally, for item 3, Fluvius points out the position taken by the telecom regulator BIPT which supports the Fluvius' calculation of the Wyre surplus value based on the degree of usefulness of the installed empty ducts. Moreover, VREG's calculation method of this surplus value is erroneous.

Apart from these three key arguments Fluvius has brought forward a number of other elements, such as the continued decrease of the remuneration on the cost of capital for the RAB surplus values, the calculation of the net working capital, the too restrictive composition the exogenous costs which can be passed through into the distribution grid fee, the financial quality incentives and the lack of measures that could determine the future of the gas grids.

Both VREG and Fluvius have requested the Markets Court to pose two prejudicial questions to the European Union's Court of Justice. The Markets Court is expected to deliver a decision by 19 February 2025 at the latest. If the Markets Court decides to pose prejudicial questions, a longer procedure before the European Court of Justice will follow.

A logical next step after establishing the tariff methodology for the new tariff period 2025-2028, is for the regulator to set the concrete distribution tariffs for each DSO for 2025. This happened

by decisions dated 17 December 2024. These tariffs taken into account the new DSO landscape after the implementation of the structural changes on 1 January 2025. On the whole, a household on average will pay about a third more for its electricity consumption in 2025 compared to 2024. The increase is especially due to the sharp increase of the electricity transmission tariffs that Fluvius has to pass through, the higher interest rates on the financial markets, the increasing investments in the distribution grid and the elimination of the remuneration from the Flemish Region for buying in green power certificates. For natural gas there is a limited increase by 6% for an average gas consumer. Here a decrease of the allowed income for the gas grid operators comes into play, but this allowed income is calculated on decreasing consumption volumes, which results in an increase of the end tariff for the consumers. Once again, these are global evolutions, the concrete tariffs are different for each distribution system operator.

We repeat that, mid-2024, the distribution system operators requested the VREG for an advance on the allowed income for electricity for the year 2025 of 69.5 million euro. This request should counter the exceptional costs for the DSOs' proactive investment policy for the energy transition and the changes in the legislation on grid and data management. In principle, an advance of 60.1 million euro was granted, but this amount was ultimately reduced to 51.1 million euro due to a restriction to 5% of the 2025 endogenous allowed income, as stipulated in the 2025-2028 tariff methodology.



## Digital meter electricity & gas

The roll-out of the digital meter for electricity and gas continues. In 2024, our teams installed an aggregate of 1 million meters (rounded figure), of which approximately 665,000 electricity meters and 410,000 gas meters. The roll-out E+G now reaches 65%. A total of 4.2 million digital energy meters have now been installed in Flanders, of which almost 60% electricity meters and 40% gas meters. Fluvius now expects to reach a global roll-out rate of 80% by the end of 2025, and the roll-out should be completed by the end of 2029.

At the end of March 2024, the energy regulator published a new report with a cost-benefit analysis of the digital meter based on a roll-out between 2020 and 2029 and taking into account the latest figures on the roll-out programme. The study shows that the cost-benefit analysis for the digital E and G meter remains strongly positive in several scenarios. The contribution of the digital gas meter in the overall benefits is rather limited, but in any case positive. That is why VREG recommended that the roll-out programme of the digital meters be continued. They are an important instrument for the end consumer to gain insight into his energy consumption, a better distribution grid management and an improved market functioning; there is still a social benefit when not only the benefits but also the costs are taken into consideration.



## Blocked access points

For quite a while, Fluvius is facing the problem of blocked access points (EANs<sup>1</sup>). Since the implementation of the Central Market System (CMS) at Atrias, millions of transactions are registered every day. In exceptional cases access points can get 'stuck'. The data are available, but they cannot be exchanged between market parties. This explains why some customers have to wait longer for a final invoice, that local production is not known by the supplier or that new metering data are not known by the supplier. Fluvius and the data platform Atrias put a lot of effort into limiting and solving this problem. At the end of 2024, there were 2,511 access points blocked for a longer period, or 0.04% of the total number of EANs. This is clearly an improvement compared to the beginning of 2024, when there were 3,552 long-time blocked EANs. Fluvius and Atrias tackle this problem in several ways by working out curative solutions as well as by taking preventive measures through adapting the Central Market System.

The energy regulator has closely monitored the situation. Finally, VREG took the measure to impose an administrative fine. The fine amounted to 40 euro for each access point which at 1 October 2024 had been blocked for more than six months; this is about 3,007 access points on a total of 6,052,767 access points managed by Fluvius. The total fine for all DSOs together amounted to 120,280 euro. Next to this, VREG also imposed a periodic penalty of 250 euro per calendar day per DSO until no more access points that had been blocked for longer than six months on 1 October 2024 are blocked within the operating area of a particular DSO. The Board of Directors of Fluvius has decided to lodge an appeal procedure against this VREG decision to impose this administrative fine and this periodic penalty.

The regulator has included a number of strict quality incentives about the influx of blocked access points in the tariff methodology 2025-2028.

## Collective decree X of the Flemish Government

Early 2024 the Flemish Government approved the so-called Collective Decree X. This decree stipulates which grids the distribution system operators directly or indirectly can own, develop, manage and operate. To be precise, apart from distribution grids for electricity and natural gas, these are electronic communication networks, grids for public lighting, thermal grids, hydrogen and carbon grids and the public sanitation network. They can only develop, manage and operate water distribution grids. The management of hydrogen grids is linked to an approval by the regulator and a positive cost-benefit analysis.

## Impact of extreme weather

On 9 July 2024 the region around the city of Mechelen was hit by locally extreme weather, with extremely fierce gales together with heavy rainfall.

This resulted in heavy damages to the electricity grid in the communities of Leest and Heffen, both at the level of transmission and distribution. Fallen high tension pylons of the transmission operator Elia, but also damaged poles and lines, as well as torn above-ground distribution connections on the Fluvius grid caused severe problems of supply. The electricity supply to the city of Mechelen had become very precarious and only depended on one single operational high-voltage line. It was the first priority to stabilize the dangerous situations in a safe way. This required to switch off certain parts of the local grid. During the weekend of 13-14 July, capacity-reducing measures were introduced to enable clearing up the damaged Elia lines. The population in and around Mechelen reacted to these measures in a positive way and with solidarity by effectively reducing their electricity consumption. This made it possible to limit the restrictive measures to Saturday 13 July only. Thanks to the coordinated collaboration between Fluvius, Elia, the city of Mechelen, a few large consumers in the stricken area, Infrabel and others, the technical teams of Fluvius and Elia were able to normalize the situation as quickly as possible and to start work on definitive repairs.

<sup>1</sup> EAN: European Article Number. A unique EAN code identifies each connection point for electricity or gas. Each E or G meter connected to the distribution grid has an individual EAN number.

## Impact of ETS on gas activities

European climate legislation aims at climate neutrality by the year 2050. A major instrument in this policy is the emissions rights system, also known as the EU Emission Trading System (ETS). A first version of ETS (ETS-1) is applicable since 2005 for entities in energy-intensive industrial sectors. A second version, ETS-2, introduces as from 2026 (or 2028 at the latest) an emissions trading system for a few additional sectors. For the Fluvius Economic Group this means that the natural gas DSOs – in their role of social supplier and supplier of last resort – will have to join ETS-2. It is beyond doubt that this has a financial impact and will lead to extra reporting requirements. The financial cost for the Fluvius Economic Group for buying ETS-2 emissions rights is estimated at 8 million euro per year, based on the relevant gas volumes for 2023. In the current tariff methodology the DSOs can pass through these costs into the distribution grid fee which is ultimately being invoiced to the end customers of the DSO as social and last-resort supplier.

## Conversion to high-calorific gas

In September 2024, Fluvius switched its last customers to high-calorific gas. A total of about 390,000 customers in 60 Flemish municipalities had to be switched from low-calorific to high-calorific gas as a consequence of the phase-out of low-calorific gas deliveries from The Netherlands.

## Investing in sewerage

The importance of sewerage networks for climate adaptation is getting clearer. It is Fluvius' policy, as a sewerage operator in well over eighty Flemish municipalities, focuses on contributing to the management of the entire water cycle, thus better coping both with periods of heavy rainfall and longer droughts.

The Flemish Region included a sanitation obligation for the local authorities in the Decree of 18 July 2003 on the integral water policy (also known as the 'Water Code'). The Flemish Environmental Agency (VMM)<sup>2</sup> has a policing competence over the municipal sewerage operators. For the 87 municipalities that have transferred their sewerage activities to Fluvius, this means that Fluvius has to carry out the following tasks:

1. The development, the sustainable management and the optimisation of the infrastructure for wastewater;
2. The development, the sustainable management and the optimisation of the infrastructure for rainwater, including infiltration and buffering;
3. Maximise infiltration and buffering through natural means the use of rainwater or other means;
4. Complying with other obligations which fit into the EU Water Framework Directive<sup>3</sup>, primarily the obligation to clean up surface water.

Fluvius substantially raised its investments for the sewerage activity over the last few years. In 2019, 75.9 million euro was invested, in 2024 159.8 million euro was invested, almost double the original amount. In spite of these efforts, Fluvius must conclude that the municipal sanitation obligation is out of reach within the available budgets. That is why Fluvius entered into a dialogue with the competent Flemish regulator to optimally align the available resources with the current objectives for reducing waste load. Furthermore, Fluvius is elaborating an investment programme with concrete projects based on a realistic investment rate which is financially feasible, can count upon sufficient technical capacities and which puts the least possible pressure on the public domain. There is no way around setting clear priorities in the project portfolio. Fluvius also provides a separate budget or strictly necessary replacement investments in the sewerage system.

The Flemish Parliament approved the 'Water Legislation' decree in April 2024. This decree makes the preparation of rainwater and drought plans a condition for being able to obtain subsidies for sewerage projects, defines the rights and duties of sewerage managers and regulates the enforcement of the municipal sanitation obligation.

In April 2024, the Flemish Parliament adapted the supra-municipal sanitation contribution. The increase of the contribution triggers a corresponding increase in the municipal sanitation contribution for the sewerage operators. To avoid a double price-increasing effect of this measure for the water consumers' invoice, the tariff for the municipal sanitation contribution decreases. Until recently, the latter was set at 1.4 times the supra-municipal contribution, this is now being reduced to 1.15 times.

<sup>2</sup> (Presumably) starting on 1 January 2026, this competence will be taken over by the Flemish Utility Regulator (VNR).

<sup>3</sup> Richtlijn 2000/60/EG van het Europees Parlement en de Raad van 23 oktober 2000 tot vaststelling van een kader voor communautaire maatregelen betreffende het waterbeleid

## District heating

### Policy on district heating

In 2024, Fluvius evaluated its policy on the heat activity. Building district heating grids fits into Fluvius' corporate strategy and vision, because it can contribute to the energy transition and the active reduction of CO<sub>2</sub> emissions. Fluvius has operations on several segments of district heating: drawing heat zone maps; designing, building, connecting and operating district heating grids, and, where needed – albeit only temporarily – the production and supply of heat. Potential projects are always evaluated using several criteria: technical feasibility, ecological efficiency, customer convenience, social criteria and, of course, financial feasibility as well.

For the benefits of district heating grids, a solidarity system between the distribution system operators and the municipal authorities was in place until recently. But such grids can only be found in a limited number of municipalities, so this solidarity system is not an evident option. That is why putting a halt to this system and introducing a system with individual accounts per municipality was investigated. The conclusion was that the current financial return of the existing heat projects is insufficient: the forecasts for the next few years indicate that this situation will probably persist. The Board of Directors has therefore decided to switch to a cost-plus system to evaluate future heat projects on their financial feasibility. In such a system the relevant opex costs and depreciations are passed through 1-on-1. Linked to this, it was decided that Fluvius will only act as grid operator in future projects. An appropriate settlement for costs from the past will be elaborated.

The amended policy on district heating will undoubtedly give a new dynamic to this activity.

### Projects

In 2024, Fluvius contributed to the development of several district heating grids and other heat projects.

In **Genk**, a cooperation agreement for the 'Thorpark' project was reached. Fluvius will take the role of grid operator. The commissioning of the heating grid with the connection of five existing buildings is expected in February 2025.

In **Antwerp**, several heat projects are ongoing. The wastewater treatment plant Deurne will act as heating source for the Antwerp East District Heating Grid, the district heating grid for the Abattoir site and the psychiatric hospital Stuivenberg. Once again, Fluvius will only be the grid operator in this project, the other project partners will be responsible for producing and supplying the heat.

Also in **Antwerp**, Fluvius has executed the tendering procedure for building the district heating grid Havana site and Luchtbal.

For the Bekaert site in **Hemiksem**, a study is ongoing into the feasibility of the construction and operation of a low-temperature grid. Fluvius would be the grid operator for this grid.

In April 2024, a letter of intent was signed for the construction of a heat grid in **Vorselaar**. Fluvius – in its own name and on behalf of Iveka (now Fluvius Kempen) – is the co-initiator together with the municipality.

At the end of April 2024, the Heat Coalition in **Mechelen** was born. Some 25 companies, organisations and institutions will together strive towards the fossil-free heating of buildings in the city of Mechelen by 2050. Fluvius is an active supporter of this initiative. District heating with sustainable heat sources will be necessary to obtain this objective.

## Data management

The Flemish authorities obliges Fluvius to draw up a bi-annual data management plan. The first edition is due to be published in 2025.

Early 2024, Fluvius launched an electricity capacity monitor for companies. This online 'open data' tool enables checking out where there is still margin for offtake from and injection into the mid-voltage grid. The capacity monitor will give different parties (companies, local authorities, power producers, energy service companies and others) the opportunity for a more efficient planning and a smoother connection process.

# Key developments in the companies in which Fluvius System Operator holds an equity stake

## De Stroomlijn

De Stroomlijn is the customer communication centre for Fluvius, Farys and De Watergroep. The shareholders in De Stroomlijn are Fluvius System Operator (62.17%), Farys (32.03%), Synductis (2.90%) and De Watergroep (2.90%).

De Stroomlijn is fully consolidated in the consolidated financial statements of Fluvius System Operator.

At the end of 2024, De Stroomlijn had 374 in-house employees or 337.90 full-time equivalents (2023: 361 employees, or 329.45 fte's). They work at four sites: Mechelen, Ypres, Ghent (Ledeberg) and Hasselt.

In 2024, De Stroomlijn registered a turnover of 26.1 million euro (2023: 27.4 million euro). The balance sheet total as at 31 December 2024 was 4.4 million euro (end of 2023: 3.9 million euro). The company's equity at the end of 2024 was 265,400 euro, unchanged from the end of 2023.

## Atrias

Atrias is responsible for creating and operating a common data exchange platform between all actors in the Belgian energy market. Atrias processes information on more than 10 million connection points and 300 million meter readings per year. Set up to replace the separate data systems within the Belgian distribution system operators, Atrias centralises data processing for the Belgian energy market into a single, federated system. The Atrias platform Central Market System (CMS) with its associated communication rules (MIG-6) went live on 1 November 2021. Since that date, CMS has controlled the mutual exchange of market data (such as meter readings and billing data) and market processes (such as people moving house and changing suppliers) through MIG-6.

All of Belgium's distribution system operators for electricity and gas are shareholders in Atrias: Fluvius System Operator (50.00%), Ores Assets (16.67%), Sibelga (16.67%), Resa (15.05%), AIEG (0.54%), AIESH (0.54%) and Réseau d'Energie de Wavre (0.54%).

At the end of 2024, Atrias had 36 employees or 34.40 full-time equivalents (2023: 31 employees or 29.6 fulltime equivalents). They realised total sales for Atrias in 2024 of 75.9 million euro (2023: 63.3 million euro). The balance sheet total as at 31 December 2024 was 56.6 million euro (2023: 77.7 million euro) with equity of 18,600 euro (unchanged during 2024).

There has been a change of CEO at Atrias: Frank De Saer has retired and has been replaced by Pascal Dekoster, who has made the switch from Fluvius to Atrias.

For consolidation purposes, Atrias is regarded as an associated participation. Atrias is consolidated with Fluvius System Operator using the equity method.

## Synductis

Synductis promotes synergy in infrastructure work carried out in the public domain and helps shape an active 'less disruption' policy.

Fluvius System Operator's stake in Synductis is 746 shares out of a total of 2,170 shares, or 34.38%. The other shareholders in Synductis are: De Watergroep, IWVA/Aquaduin, Aquafin, Pidpa, Proximus, and Farys. In addition, Synductis works closely with the Flemish Agency for Roads and Traffic (AWV) and the Flemish public transport company De Lijn, on the basis of mutual cooperation agreements.

Synductis' business plan is based on the principle of providing high-quality service to customers (local authorities, residents, shops and businesses). Building a high-performance IT platform must help realise this goal.

Synductis has no staff of its own. The utility companies which own it make their own staff available to Synductis as and when required, based on the projects that arise.

Synductis recorded turnover of 2.7 million euro in financial year 2024 (financial year 2023: 1.7 million euro). The balance sheet total at the end of December 2024 was 1.6 million euro (2023: 1.7 million euro). Synductis' equity remained unchanged over 2024 at 21,700 euro.

Fluvius consolidates Synductis as a company with participating interests using the equity method.

## Wyre

Wyre is building a fibre network in Flanders and parts of Brussels. Wyre is rolling out this fibre network with a clear balance between urban and rural areas. Trenches for infrastructure works are maximally shared.

In 2024, Wyre had over 200,000 homes in construction.

In July 2024, Wyre signed a Memorandum of Understanding with Proximus and Fiberklaar for a potential collaboration on the further deployment of fibre networks in Flanders. The intended collaboration, which is dependent on the parties reaching a final agreement, obtaining regulatory and antitrust approvals and subject to no adverse regulatory findings or impacts, would cover approximately 2.7 million homes across zones with medium to low population density, while continuing to leverage Wyre's existing HFC network to benefit consumers, businesses and society as a whole.

Wyre, through Wyre Holding that holds 100% of the Wyre shares, has two shareholders: Telenet (66.8% of shares) and Fluvius System Operator (33.20%).

At the end of 2024, Wyre had 219 employees (or 211.8 FTE); at the end of 2023, this was 193 employees (187.1 FTE). Wyre Holding itself does not have any staff.

Based on preliminary figures provided by Wyre, the 2024 turnover amounted to 683 million euro. The balance sheet total as per end December 2024 was 6,218 million euro, with the company's equity at 2,777 million euro.

From Fluvius System Operator's view, Wyre Holding is being consolidated through the equity method.

## Brief overview of the financial results

The brief review of the statement of financial position and profit & loss statement below is based on the consolidated IFRS accounts of the Fluvius consolidated group, being Fluvius System Operator cv as the consolidating entity, together with De Stroomlijn and its associated companies Atrias, Synductis and Wyre according to the equity method.

### Annual accounts 2024 – Fluvius System Operator CV [consolidated, IFRS]

#### Profit and loss statement

[in 1.000 EUR]	2022	2023	2024	Evolution 2023-2024 [%]
Operating income	2,011,644	2,505,752	2,799,356	12%
Operating costs	1,999,662	2,407,287	2,771,183	15%
Operating profit	11,982	98,465	28,173	-71%
Financial result	-4,752	-21,594 <sup>1</sup>	-31,538	46%
Taxes	7,230	8,916	9,176	3%
<b>Profit for the financial year</b>	<b>0</b>	<b>67,955</b>	<b>-12,541</b>	<b>-118%</b>

<sup>1</sup> Including a one-off share of result from associated participations and joint ventures amounting to 10,178 k euro [profit] and -12,541 k euro [loss] in 2024

Fluvius performs its operating tasks at cost without charging any commercial margin to its principals. The negative profit balance of -12,541 k euro for the financial year 2024 is exclusively and directly a result of Fluvius System Operator's participation in Wyre Holding (and so indirectly in Wyre). The stated amount represents Fluvius' share in the loss of Wyre for the financial year 2024.

#### Statement of financial position

[in 1.000 EUR]	2022	2023 [as reported]	2023 [restated]	2024	Evolution 2023-2024 [%]
Fixed assets	5,324,371	7,860,695	7,835,202 <sup>1</sup>	8,444,995	8%
Current assets	1,565,396	943,691	943,691	804,466	-15%
<b>Total assets</b>	<b>6,889,767</b>	<b>8,804,386</b>	<b>8,778,893</b>	<b>9,249,461</b>	<b>5%</b>
Equity	1,617	1,002,382	976,989 <sup>1</sup>	964,448	-1%
LT liabilities	5,277,248	6,744,442	6,744,442	7,393,936	10%
ST liabilities	1,610,902	1,057,462	1,057,462	891,077	-16%
<b>Total liabilities</b>	<b>6,889,767</b>	<b>8,804,386</b>	<b>8,778,893</b>	<b>9,249,461</b>	<b>5%</b>

<sup>1</sup> The final accounting treatment of the business combination in Wyre Holding bv has now been completed within the applicable period of 12 months. The impact on the reported financial statements as at 31 December 2023 amounts to -25,493 k euro on the items '13 Investments in associates and joint ventures' and '21 Equity'.



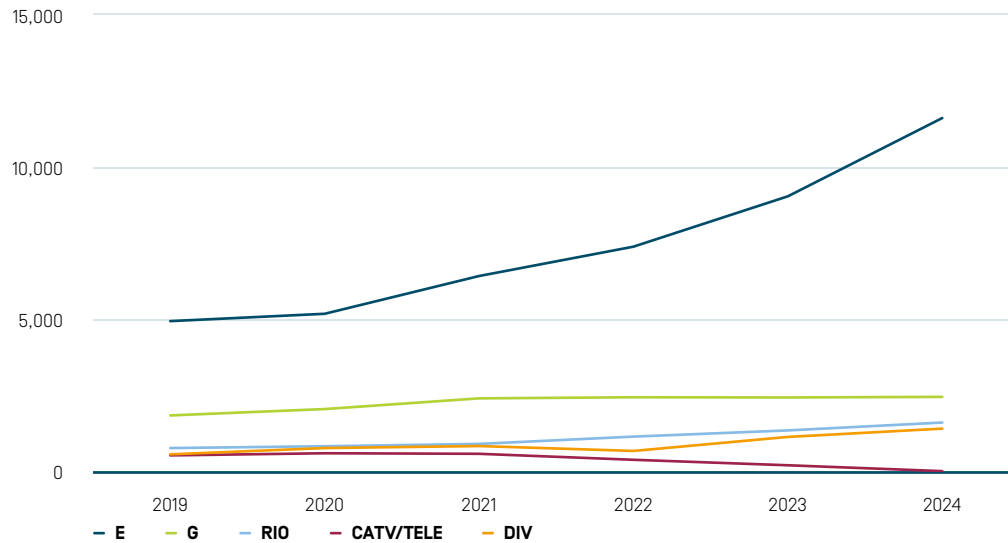
## Investments made in 2024

The gross investments carried out by Fluvius in 2024 amounted to 1,704.5 million euro (2023: 1,411.6 million euro). This represents a remarkable year-on-year increase by 292.9 million euro, or +20.7%.

The investment amounts 2024 in more detail:

- 1,161.1 million euro for electricity (including the investments in 70/36 kV grids) – 2023: 903.7 million euro;
- 244.2 million euro for gas – 2023: 242.2 million euro;
- 159.8 million euro for sewerage – 2023: 133.9 million euro;
- 139.8 million euro for other activities (i.e. district heating and public lighting) – 2023: 112.5 million euro.

In the first half of 2023, Fluvius invested 19.3 million euro in the segment 'cable and data communication'. Due to the contribution of this activity into Wyre on 1 July 2023, Fluvius no longer invests in this business segment.



Please note the following:

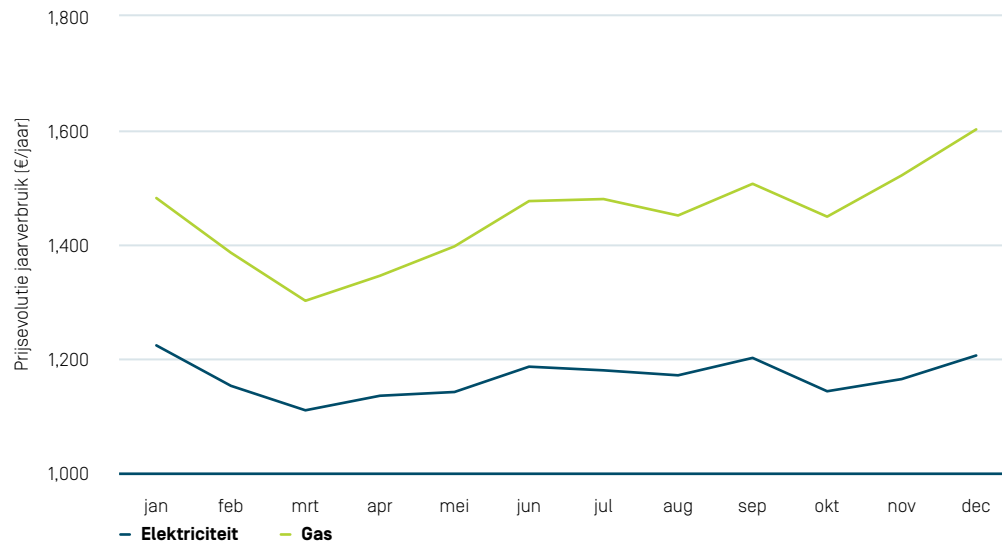
- The 2023/2024 figures already demonstrate clearly the shift within the energy segment from natural gas (with a quasi-stable investment) towards electricity (+28.5%).
- The investments for the digital meter roll-out in both electricity and gas are at cruising speed.
- Public lighting in particular, due to the acceleration in the switch towards LED, triggers an increasing investment volume in the segment 'other'.
- Also investments in the sewerage grids are rising year after year: from 75.9 million euro in 2019 to 159.8 million euro in 2024 (+110.5%).

# The energy markets in 2024

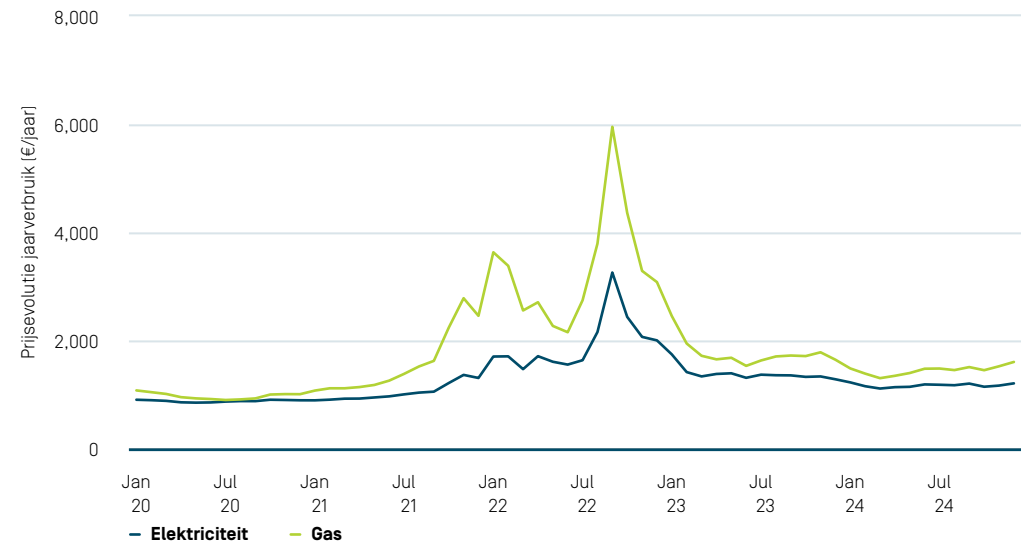
In 2024, relative calm has returned to the Flemish energy market. This is also evidenced by the graphs below; they present the price evolution for electricity and gas<sup>1</sup>. The first graph illustrates the monthly prices during 2024, the second graph presents these same prices for the period 2020-2024.

After a declining trend in the first quarter of 2024, prices once again started to rise, especially for natural gas. The gas price reached its highest level in 2024 near the end of the year. Viewed over a longer term, the peak prices at the time of the energy crisis (mid 2020 – early 2023) stand out. Especially the gas prices reached unprecedented levels at the time.

Price evolution of yearly consumption in 2024



Price evolution of yearly consumption in 2020-2024

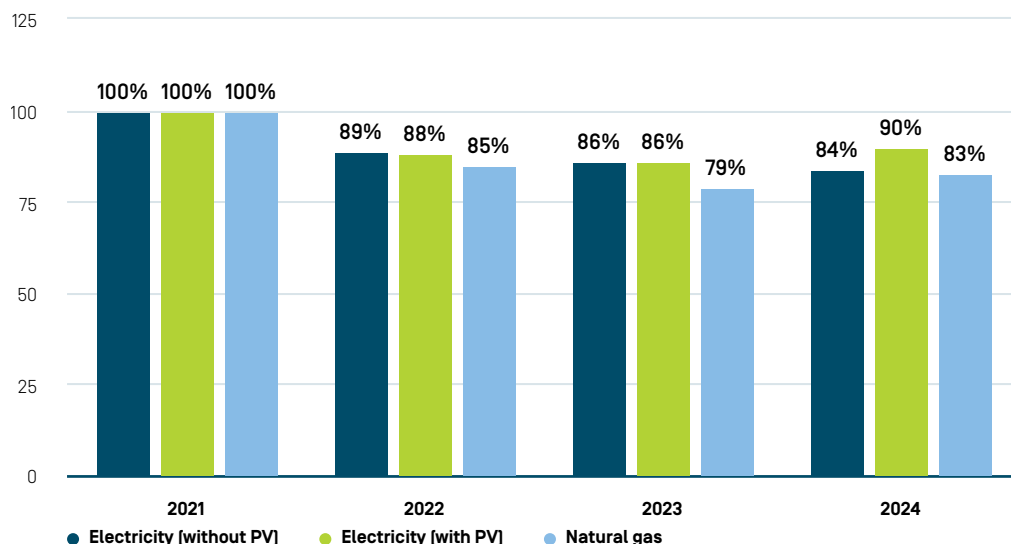


<sup>1</sup> Price for annual consumption in euro; for electricity, it is based on an annual consumption of 3,500 kWh with a double-tariff meter; for gas, an annual consumption of 23,260 kWh with gas used for cooking and heating purposes [source: VNR].

We conclude that the past energy crisis, with its elevated prices for electricity but even more so for gas, have incentivized end consumers to change their behaviour. This is demonstrated by the consumption volumes<sup>2</sup> we registered in the last three years:

Daily consumption in kWh	2021	2022	2023	2024
<b>Electricity (without PV)</b>	8.77	7.77	7.51	7.41
% evolution compared to 2021		-11.4%	-14.4%	-15.5%
<b>Electricity (with PV)</b>	10.32	9.09	8.83	9.24
% evolution compared to 2021		-11.9%	-14.4%	-10.5%
<b>Natural gas</b>	37.06	31.57	29.25	30.77
% evolution compared to 2021		-14.8%	-21.1%	-17.0%

The decreasing trend in consumptions appears very clearly in the graph below in which the 2021 consumption volume represents 100%.



<sup>2</sup> Average daily consumption in kWh, for gas normalised for differences in temperature

The Belgian electricity market is in full transition. This is also clear from the 2024 electricity generation figures. Never before was the share of solar energy in the total generation mix so high as in 2024: 29.8% of electricity generated came from solar panels (2023: 28.2%). On the other hand, electricity generation from gas with a share of 17.6 has never before been so low as in the past year (2023: 25.2%). One of the consequences of the sharp increase of renewable electricity generation – when there is a large and simultaneous volume of solar and wind energy available – is the increasingly frequent phenomenon of negative power prices on the wholesale markets. Conversely, prices tend to rise in periods with a low supply of solar and wind energy.

In 2024, Belgium as a whole registered increased electricity consumption by 2.0% to 80.5 TWh (2023: 78.9 TWh).

Belgian households and companies have consumed more gas in 2024. But total gas consumption in Belgium has gone down as a result of a substantially lower gas consumption in gas-fired power generation plants. The overall decrease in consumption volumes for natural gas is a continuation of the decreasing trend we saw the last few years.

The increased gas consumption by residential consumers is primarily due to the average temperature in 2024 compared to the year 2023. The number of degree days, which is an indicator for the average temperature, in 2024 came out at 1,942 (2023: 1,914). The five-year average (2020-2024) is now 1,986 degree days and the normal figure is 2,301 degree days. In other words, 2024 was 1.5% colder than 2023, but 2.2% warmer than the five-year average and even 15.6% warmer than the normal annual temperature. Industrial gas consumption, which to a large degree depends on the economic climate and less so on temperatures, increased by approximately 10% year-on-year. Gas-fired power plants consumed remarkably less gas in 2024, especially as a result of the prices on the international markets. The largely eliminating gas import from Russia and the search for alternatives have triggered an upward pressure on the price levels. Volatility in the gas reserves can also result in price fluctuations.

For the residential consumer in Flanders, the electricity price declined by 1.4% between January and December 2024. Compared to the peak price during the energy crisis (September 2022) the price in December 2024 is 63.0% lower. For natural gas, the end price for a residential Flemish end consumer increased by 8.1%. But if this price is compared to the peak level of September 2022, we register a price decline by no less than 73.1%.

# Economic context

The economic context for Fluvius in 2024 was characterized by the geopolitical situation and its impact on interest rates, inflation and the energy markets.

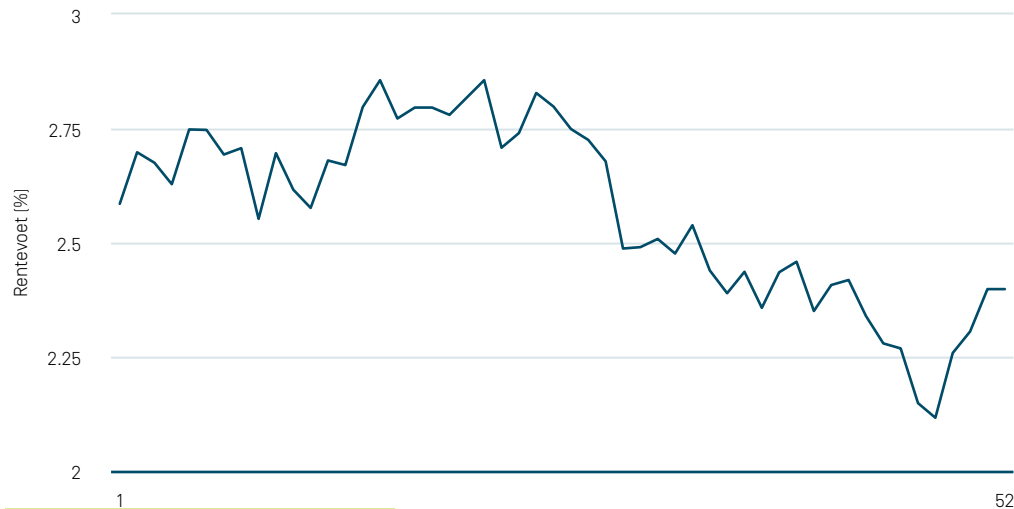
Geopolitically, the war in Ukraine continues to create tensions in Europe. However, this armed conflict does not have any real direct material or financial impact in the past financial year 2024. Fluvius System Operator and the other entities in the Fluvius Economic Group are in no way active in Ukraine or Russia. The economic sanctions against Russia do not have any substantial impact on Fluvius' activities.

To the extent that the situation in Ukraine was at the origin of a worldwide disruption of the supply chains, Fluvius is also faced with the delayed deliveries of specific materials and thus an increased risk of stock breaks. Fluvius has taken anticipatory measures by building a larger stock of certain critical materials to increase security of supply and to safeguard its operational activities.

Financially, the European Central Bank (ECB) lowered interest rates four times over the course of 2024. So ECB's central deposit rate came down in four steps from 4.00% (until 6 June 2024) to finally 3.00% (as from 12 December 2024). The 10-year rate<sup>1</sup>, which is very important as a reference rate for the long-term funding of Fluvius' operations, moved between a minimum of 2.116% in week 48 and a maximum of 2.856% in week 22. On average over 2024, this interest rate came out at 2.570%. The evolution is presented in the graph below at the left hand side.

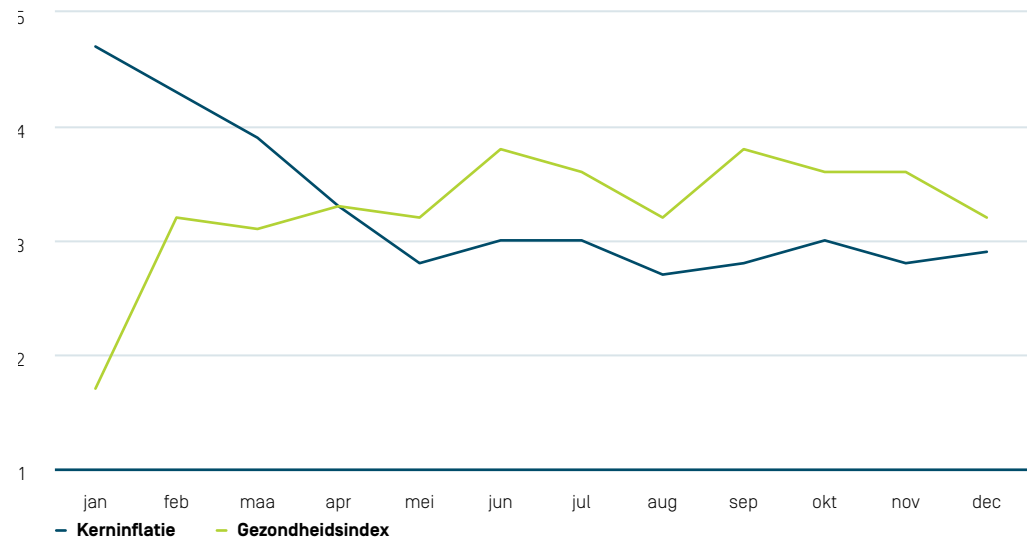
The evolution of inflation in Belgium over 2024 is presented in the graph below at the right hand side.

**Interest rates in 2024 [weekly figures]**



<sup>1</sup> Euro Interest Rate Swap-rente (IRS), weekcijfers over 2024

**Inflation and health index in Belgium**



# Legal disputes

## Claim by Proximus

Following the takeover by Telenet of the cable television customers and the establishment of a lease over the cable network, Proximus filed a complaint at the Court of First Instance in Antwerp calling for the contracts to be voided and claiming damages. This claim was rejected at first instance [judgment of 6 April 2009]. Proximus appealed to the Antwerp Court of Appeal.

Proximus demanded the disclosure of all documents related to the agreement between Telenet, Interkabel Vlaanderen and the cable companies. It also demanded the annulment of these agreements and damages of 1.4 billion euro based on an expert report it had commissioned. The above-mentioned agreements include a limitation of liability for the cable companies in the Fluvius Economic Group through an indemnity clause, at the expense of Telenet. As a result, in the event of a ruling against them, Interkabel Vlaanderen and the cable companies would in principle be obliged to compensate any losses incurred by Proximus only up to a maximum of 20 million euro.

The Court of Appeal fully rejected Proximus's claims in a ruling of 18 December 2017. At the end of June 2019, Proximus appealed this ruling to the Court of Cassation.

On 22 January 2021, the Court of Cassation ruled on this appeal and held that the ruling of the Antwerp Court of Appeal had to be partially annulled. The partial annulment only pertained to the point that the Antwerp Court of Appeal did not sufficiently justify its refusal to void the agreement between Telenet and the cable companies, but it did not rule on the merits on this point. The case has been sent to the Brussels Court of Appeal to examine and rule on this matter. The Court of Cassation therefore did not decide to overturn the ruling on Proximus's claim for damages. This would have meant that Proximus's claim for damages had been definitively rejected. The Court of Cassation therefore did not decide to overturn the ruling on Proximus's claim for damages.

On 16 June 2021, Proximus issued a summons to Telenet and the cable companies to appeal after cassation. Through these proceedings, Proximus is demanding the annulment of the agreements between Telenet and the cable companies. In addition, Proximus once again claims damages (currently estimated at 1 euro provisionally) for unlawfully concluding and maintaining the agreements. Furthermore, Proximus is demanding that the performance of the agreements cease, and is seeking a preliminary injunction in the event that it is considered that no remedy/damages is possible for Proximus. In the first appellate conclusion filed by Proximus following the appeal in cassation, its provisional claim for damages had not yet been estimated. Also in Proximus's latest conclusion filed in December 2022, the damages it sought are still not estimated and its claim is still limited to 1 euro provisionally. Proximus asks that the debate on the exact extent of the damages is only addressed in a second stage, following an interim judgment by the Court on the liability of Telenet and/or the intermunicipal associations. In subordinate order, Proximus requests the appointment of a court expert with the task of advising on damages. All parties have since filed their final conclusions. The date for the hearing is not yet confirmed.

## Gas explosion in Wilrijk

On 3 September 2019, a gas explosion occurred in Wilrijk (Antwerp), resulting in one fatality, three cases of severe injury and significant material damage. The council chamber in Antwerp had referred the company Fluvius System Operator and two of its managers (namely the CEO and the Director of Network Operations) to the correctional court for their possible involvement in events that may have led to the explosion. The Antwerp correctional court cleared both Fluvius managers of criminal liability on 27 April 2021, finding them not personally responsible for the events. The court handed down a suspended sentence for the company Fluvius System Operator, and Fluvius was ordered to pay all civil claims. Fluvius is and remains of the opinion that the company, its managers, and staff are not at fault in the tragic events, and that the evidence and arguments presented by Fluvius in the course of the proceedings, which prove that Fluvius is not at fault, were not sufficiently taken into account. Based on these considerations, the company has appealed against this ruling by the Antwerp correctional court. An initial hearing in the appeals process took place on 18 May 2022. Following this hearing, on 1 June 2022, the Court of Appeal decided to appoint an expert from the civil interlocutory proceedings also for the criminal law aspect. The expert was to submit his report by 31 January 2023. The appeal hearing was scheduled for 29 March 2023. This hearing was postponed as the expert could not deliver his report on time. An additional appraisal was made on 9 August 2023; the final report was expected in early 2024. The court hearing took place on 13 November 2024.

## Administrative fines imposed by VREG

On 20 December 2024, the energy regulator VREG imposed administrative fines on the DSOs for a total amount of €51,027.35 due to the late installation of digital meters at consumers who had notified Fluvius of a PV installation between 1 January 2022 and 31 January 2023. In reaction, on 19 February 2024, Fluvius filed a request for annulment of this decision by VREG at the Council of State. This proceedings was still pending at the end of 2024; a ruling is expected in the course of 2025.

## Green power certificates fraud

Back in 2017, Distribution System Operator Gaselwest had suspended payments for the minimum support for solar panels on six PV installations. Following this, the parties involved initiated a summary proceedings. After several legal steps, the Court of Appeal in Brussels in criminal cases delivered a favourable ruling (the defendants were declared guilty, Fluvius' claim of more than 14 million euro was awarded). At the beginning of 2023, a few of the accused appealed in cassation the appeal decision, but this cassation appeal was dismissed entirely and the decision in appeal was upheld. All of this resulted in a settlement, reached after negotiations. The condemned parties will pay the damages awarded by the court in instalments.

## Ruling on the minimum support for solar panels

The Antwerp Court of Appeal ruled in April 2023 in a dispute about the commissioning date of a PV installation, and by extension about the exact amount of the minimum support the installation was entitled to. The Court did not follow Fluvius' and the regulator's view in this. Both parties separately decided to appeal this ruling before the Court of Cassation.

# Outlook

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## Major events after closure of the financial year 2024

### Appeal proceedings against the establishment by VREG of the distribution grid fees electricity & natural gas 2025

Aligned with the decision to appeal the decision on the tariff methodology before the Markets Court, in January 2025 the individual DSOs went to the Council of State appealing the 16 decisions by VREG dated 17 December 2024 establishing the distribution grid fees for the year 2025. This additional proceedings is a necessary step if the Markets Court decides to annul the tariff methodology.

### Preliminary ruling by the Markets Court

In the proceedings relating to the energy regulator's decision on the E&G tariff methodology 2025-2028, the Markets Court handed down a preliminary ruling on 19 February 2025: the Court will submit three prejudicial questions to the Court of Justice of the European Union. This preliminary ruling does not have a suspensive effect, which means that the tariff methodology 2025-2028 will be applied for the 2025 electricity and gas grid fees.

### Gas explosion Wilrijk - appeal procedure

On 19 March 2025, the Antwerp Court of Appeal ruled in the case about the explosion in Wilrijk on 3 September 2019. This explosion was caused by a third party hitting a connection pipe with an excavating machine. Fluvius had appealed an earlier conviction by the Court of First Instance, as we believe the cause of the explosion was not our fault. Despite an extensive defence, The Court of Appeal did not follow Fluvius and Fluvius was convicted to a fine and the payment of damage compensation to the civil parties. Fluvius is now analysing the ruling in detail to see which follow-up steps are possible. An appeal in cassation is under consideration.

### Rating at Creditreform Rating AG suspended

On 13 January 2025, Creditreform Rating AG informed Fluvius that it had suspended the 'unsolicited' credit rating of Fluvius as from that same date 'due to business reasons'.

### Financing for Wyre

On 18 February 2025, Wyre announced that it had secured a financing facility of 500 million euro at EURIBOR +2.75%. This is the first external financing for Wyre, independent from its shareholders Telenet (66.8%) and Fluvius System Operator (33.2%). This financing facility will enable Wyre to support its roll-out ambitions and to fully fund its investment plans for the next years.

### Appeal in cassation on the minimum support for solar panels

In January 2025, the Court of Cassation delivered a positive ruling in cassation in this matter, more particularly the annulment of the ruling by the Antwerp Court of Appeal. Meanwhile, all parties involved have started negotiations with a view to a definitive settlement of the matter.

### European Court of Justice - public procurement law

The Commercial Court of Ghent had submitted some prejudicial questions to the European Court of Justice in a case of a judicial procedure initiated by a supplier of sewerage tubes about an alleged infringement by Fluvius of the public procurement law. On 16 January 2025, the Court ruled on these prejudicial questions and sent the matter back to the Commercial Court. The latter now has to resume the proceedings. Fluvius will continue to defend its interests in this matter.

### Green bond issued

On 12 March 2024, Fluvius System Operator successfully issued a 700 million euro green bond. This debt instrument has a 10-year maturity with a fixed annual coupon of 3.500%. This issuance is a major step in financing the energy transition and climate adaptation in Flanders.

### Structural changes as from 1 January 2025

We draw the reader's attention on the decisions to implement a number of so-called structural changes. These changes were taken in the course of 2023 by different governing bodies levels of both the Fluvius Economic Group and the cities and municipalities; they will take effect starting on 1 January 2025. As from that date, they will have a considerable impact on the Fluvius



Economic Group structure. Additionally, the Fluvius Economic Group has to take into account the consequences of some voluntary mergers of municipalities, equally taking effect on 1 January 2025. These internal structural changes within the Fluvius Economic Group do not change in any way the operating area for Fluvius System Operator, which will still cover the entire Flemish Region in the future. Neither do they change the value of the technical infrastructure at the disposal of the Fluvius Economic Group.

The Decree obliges:

- that there is one single grid operator in each municipality for distributing electricity and natural gas;
- each distribution system operator should have a contiguous operating area (i.e. so-called 'islands' are prohibited);
- and each DSO needs to have at least 200,000 connections.

All of this resulted in the following changes:

- a number of divestments at Fluvius Antwerpen, in which the divested parts are being taken over by Fluvius Imewo, Fluvius Kempen, Fluvius Limburg and Fluvius Zenne-Dijle;
- a partial divestment at Fluvius Limburg with the divested part going to Fluvius Zenne-Dijle;
- a partial divestment at Iveka with Fluvius Antwerpen taking over the divested part;
- at Fluvius West there partial divestments, and the divested parts are going to Fluvius Imewo and Fluvius Kempen;
- the remaining part of Fluvius West is merged with Gaselwest to form the (new) Fluvius West;
- at Gaselwest there is a partial divestment and the divested part goes to Fluvius Imewo;
- Intergem and Iverlek both have a partial divestment, in which the divested parts are being transferred to Fluvius Halle-Vilvoorde.

Some of the (restructured) distribution system operators within the Fluvius Economic Group change their name, taking effect on 1 January 2025.

**Old name (until 31 December 2024)**

**New name (from 1 January 2025)**

Gaselwest & Fluvius West	Fluvius West
Fluvius Antwerpen	Fluvius Antwerpen
Fluvius Limburg	Fluvius Limburg
Iveka	Fluvius Kempen
Sibelgas	Fluvius Halle-Vilvoorde
Imewo	Fluvius Imewo
Intergem	Fluvius Midden-Vlaanderen
Iverlek	Fluvius Zenne-Dijle

To be brief, starting in 2025 Fluvius System Operator will be the operating company for eight distribution system operators for electricity and gas; until the end of 2024; there were ten of them. For Riobra, which only has operations in the sewerage segment, nothing changes.

Fluvius has put in maximum effort to minimize the impact of these structural changes on our services towards our customers.

# Investment plan 2024-2033 for energy and climate transition

## About the investment plan

With the drive for climate neutrality by 2050 and all the associated evolutions in mobility, heating of buildings, industrial processes and the generation of renewable energy, the electricity grid will play an increasingly important role in the coming years. In the [Investments plan 2024-2033](#), Fluvius details what changes are needed to make the Flemish electricity and gas networks ready for the energy transition (electrification of mobility, more solar and wind energy and the switch from fossil fuels to solar panels and heat pumps, etc.) and what investments are required in this regard. Fluvius bases this on the societal context and the policy framework. We rely on a number of long-term assumptions, based in part on the ambitions in the [Flemish Energy and Climate Plan](#).

The plan for 2024-2033 is a first revision of the original investment plan 2023-2032. The second plan (2024-2033) was also jointly prepared in extensive stakeholder consultations. Sectoral and civil society organisations, universities, onshore wind farm project developers, charging station operators and reference customers were surveyed about the assumptions underlying the investment plan. As required by the Energy Decree, Fluvius also consulted transmission system operator Elia and all relevant grid users ahead of this updated investment plan.

Following the public consultation, Fluvius collected all the questions and comments submitted, formulated its response to them and submitted the complete file to the VREG, the Flemish energy regulator. The VREG approved this updated investment plan on 28 March 2024. The plan for natural gas was approved without any further remarks by the VREG. The investment plans for electricity were approved by the VREG under the condition that Fluvius would publish an addendum in which the investment scenarios and their underlying assumptions are described, the input received from stakeholders is discussed and which details how the long-term plan is translated into concrete investment projects for the next three years. This addendum has meanwhile been published.

As from 2025, Fluvius will have to draw up such an investment plan every two years.

## The future role of distribution system operators

In 2024, the Board of Directors discussed the future role of the DSOs, partly against the background of the energy and climate transition and the significant regulatory push from Europe.

Two large pillars in the European energy policy are the 'Green Deal', the switch towards a carbon-free and climate-neutral economy, and the creation of the digital continent Europe. This should take place at the lowest possible cost for the consumer and whilst safeguarding the security of supply. If we translate this to the energy distribution management in Flanders, this means operating digital and efficient distribution grids, putting the customer in a central position, interoperability (i.e. exchanging data within the framework of partnerships) and creating a secure and stable digital network. Points of attention for Fluvius and the Fluvius Economic Group's DSOs are the further large-scale integration of all kinds of renewable energy sources into the distribution grid, more cross-sectoral partnerships, full focus on digitization as a means to create new market opportunities and involving the consumers as much as possible in the necessary transformations of the energy market.

Fluvius has integrated these trends into its Investment Plan Energy & Climate Transition 2024-2033 which outlines the best possible estimation of the required investment budgets over a ten-year horizon and based upon actual facts and trends.

## Electricity in the investment plan 2024-2033

Like the 2023-2032 plan, the 2024-2033 plan assumes intensified electrification, with further growth in electric mobility and electric heating applications in particular. Fluvius therefore intends to realise a 'no regret' investment plan, i.e., one that anticipates higher peak consumption as much as possible. Over a 10-year period, the investment needs are estimated at around 4 billion euro (unchanged from the first edition of the plan), of which roughly three-quarters in low-voltage grids and one-quarter for reinforcing the high-voltage grid. However, essential preconditions are the availability of sufficient financial resources, qualified staff (in-house employees and/or staff at contractors), and the required materials.

The next update of the Investment Plan Energy & Climate transition will cover the period starting in 2026.

More information on our policy on energy can be found in the [CSRD section of this report](#).

## Gas in the investment plan 2024-2033

We can expect the distribution of fossil natural gas to be gradually phased out. The Fluvius Investment Plan therefore no longer includes additional funds for further expansion of the gas grid. Only investments related to the legal obligations regarding security of supply for grid users and secure access to the grid are still planned and budgeted for. The gas plan is therefore characterised as a 'keep-it-running' plan.

With regard to 'green molecules', Fluvius intends to keep all possibilities open for the future use of the existing gas distribution system pending further research and the outcome of various test projects.

More information on our policy on energy can be found in the [CSRD section of this report](#).

## The future of the gas distribution grids

Fluvius is fully aware of the question marks around the long-term future of the gas segment, and thus the distribution networks for natural gas. The general trend towards electrification and the phase-out on the long term of fossil natural gas brings along the risk for the current grids operated by Fluvius to become obsolete by then. From a financial point of view, a substantial non-depreciated value ('stranded asset') would remain. On the other hand, we notice some promising developments regarding hydrogen, biomethane and the capture and storage of carbon<sup>1</sup>. Partly against this background, the Board of Directors executed a broad thought exercise in 2024 on a future-oriented vision for the natural gas grids.

First and foremost, the Board concluded that there is a strong link between natural gas and electrification. A consumer who switches away from natural gas, will in most cases choose electricity. But natural gas will certainly keep an important role during the transition phase until 2050. In that period, Fluvius will have to guarantee the safe and high-quality supply and service for natural gas. This 'keep-it-running' policy is also integrated into the 2024-2033 Investment Plan for the energy and climate transition. Fluvius is anticipating in its investment policies on the gradual phase-out of natural gas by a decrease of the number of kilometers new grid to be built each year: in 2011, we installed about 1,400 kms gas grids; by 2032, this will probably be some 200 kms. Investment budgets for natural gas until 2033 will in any case be decreased substantially.

Here is a lot of uncertainty about renewable gases at this moment. Especially the potential volumes and the speed with which these technologies will be introduced remain unclear. When repurposing the current gas grids, Fluvius has the benefit that 95% of Flemish homes are connectable to a gas grid. So almost all Flemish households can in the future be reached with pipelines for alternative purposes.

The Board of Directors came to the following conclusions:

- We want to keep the infrastructure for natural gas running in a **secure** way, until a technically feasible and affordable alternative is at hand. The technical phase-out of natural gas should follow renovation and electrification; irreversible choices are not appropriate at this stage;
- **Repurposing** of the infrastructure for natural gas should happen at the right moment. That is why we want to keep open all options. We want to keep on focusing on bringing together grids and customers;
- Acting **proactively with regard to financing**: this means that the best option is to act and anticipate on the 'new normal' regarding the use and scale of the gas grid, when the financial impact is still relatively limited.

<sup>1</sup> Carbon Capture Utilisation & Storage, abbreviated to CCUS. This technology allows first of all the capture of carbon in industrial processes, its purification as well as its transport and storage. The stored carbon can then be used in all kinds of production processes.

# CSRD statements

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# General information [ESRS 2]

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# Basis for preparation [BP]

This chapter explains the principles Fluvius adheres to in collecting, analyzing and reporting sustainability data. The aim is to ensure transparency and reliability in our reporting so that stakeholders get a clear and accurate picture of our sustainability efforts and performance.

## General basis for preparation of sustainability statements [BP-1]

These CSRD statements for the financial year 2024 have been prepared on a consolidated basis for Fluvius System Operator and they also include its subsidiary De Stroomlijn, together also referred to as the Fluvius Consolidated Group. The reporting is structured in such a way that the scope of consolidation is identical to the IFRS financial reporting. The participation in Atrias, Synductis and Wyre Holding are accounted for using the equity method; they are not fully consolidated. These companies are therefore outside the scope of CSRD reporting. Fluvius also has no operational control over these entities.

For qualitative data, the information presented always concerns Fluvius System Operator. Impacts, risks and opportunities for De Stroomlijn are disclosed where it is considered material. All quantitative data are presented on a consolidated basis, unless the scope of the indicator is stated otherwise. For indicators relating to Fluvius System Operator staff, the service agreement between Fluvius OV (Opdrachthoudende Vereniging, EN: mandated association) and Fluvius SO (System Operator), under which Fluvius OV employees are fully assigned to Fluvius SO, should be taken into account. Consequently, for the employees of Fluvius System Operator as an operating company, this report will always consider the sum of the employees of both Fluvius SO and Fluvius OV. Where relevant, employee data will be reported on a consolidated basis (including Fluvius OV and De Stroomlijn) or on a disaggregated basis.

The reporting structure and content are in line with the European Sustainability Reporting Standards (ESRS). Together with our stakeholders, we have carried out a double materiality analysis, which forms the basis for the content of this report. The entire value chain (including up- and downstream) was mapped and included in the exercise.

Fluvius is committed to communicate in an open and transparent manner about its sustainability strategy and performance. No reporting requirements have been omitted from this report due to sensitive information or intellectual property. In addition, no exceptions have been made for issues that are currently under investigation or negotiation.



# Disclosures in relation to specific circumstances [BP-2]

## Specific circumstances

The financial year 2024 marks the first implementation of the CSRD legislation in Europe. Fluvius is among the pioneer group of companies to implement these regulations. This process has been carried out with the best possible efforts, but has certainly created specific circumstances in which this report has been prepared.

## Time horizon

In the double materiality analysis, the analysis and assessment of impacts, risks and opportunities (IROs) also considered the time horizon. This made it possible to distinguish between potential short, medium and long term impacts and to adjust priorities accordingly. For most IROs, the time horizon is somewhat related to probability. Less likely impacts are usually expected to occur in the longer term. However, this is not always the case. In some cases, an impact is unlikely but could still occur in the short term. Therefore, the analysis is always done at the individual IRO level.

The table below shows the relationship between probability and time horizon for most IROs. Exceptions are possible, as mentioned above.

Time horizon	Period	Likelihood
Short term	+/- 1 year	Current, very likely (>70%) Likely (>60%)
Medium term	2-5 years	Possibly (>40%) Unlikely (>20%)
Long term	> 5 years	Very unlikely (>5%)

## Value chain and sources of estimation uncertainty and uncertain outcomes

In preparing the Sustainability statements, management made use of assumptions, judgments and estimates that affect certain reported indicators. As a result, there is an inherent uncertainty in our calculations with respect to such reported indicators. The estimations and underlying assumptions are based on management's experience and various other factors, including input from experts where deemed needed, and are believed to be reasonable. Such estimations and underlying assumptions are reviewed frequently to improve accuracy going forward in our reported figures. Our actions in this respect, include, amongst others, reducing the dependency on the use of assumptions or estimations as better data sources become available.

Approximations may come from one or more different sources:

- **Assumptions:** These are assumptions made in the preparation of reports. They are based on past experience, knowledge or expectations, but may vary from situation to situation and therefore may introduce uncertainty.
- **Industry averages:** These are averages calculated from data from a particular sector. While useful for benchmarking, they may contain uncertainties because they do not always reflect the unique circumstances of a particular organisation or situation.
- **Estimates:** These are estimates made when precise data are not available. They are based on available information and professional judgment, but may vary depending on the accuracy of the data and methods used.
- **Indirect sources:** These are data or information not obtained directly, but through intermediaries or secondary sources. They may contain uncertainties because the original source may not be fully reliable or accurate.

The calculation of quantitative data with the corresponding approximations has an impact on the accuracy of the data. It is estimated that the reality could be approximated with sufficient accuracy from the sources used. Whenever approximations are used in the compilation of metrics, the metrics used, the basis on which the data were compiled, the level of accuracy achieved and how accuracy will be improved in the future are explained.

Fluvius is continuously working on mapping the value chain in active collaboration with our suppliers and contractors. It is therefore our ambition to further improve the accuracy of the metrics. Given the current trend towards standardisation in sustainability reporting, this will lead to a greater availability of qualitative data sources with a higher degree of maturity in the future.

All information containing expected future developments is considered uncertain and subject to a variety of internal and external factors that may affect the actual result.

## Changes in the preparation or presentation of sustainability information

As mentioned before, this is the first time that the sustainability report has been prepared in accordance with the CSRD guidelines. However, the report for the financial year 2023 was already partially structured according to the ESRS topics. CSRD requires a lot of additional information to be included in the sustainability report. This information is provided in new metrics, figures and explanatory notes.

## Corrections in previous reporting periods

In the reporting for the financial year 2023, the following element was incorrectly reported. EU Taxonomy activities targeting the Climate Change Mitigation objective were reported as also targeting the Climate Change Adaptation objective. This was not the case and only the Climate Change Mitigation objective can be used. In addition, activities that are neither Facilitating [F] nor Transition Supporting [T] were incorrectly labelled as both F & T. Finally, the 'Disclosure of information relating to activities related to nuclear and fossil gas' was added to the reporting. This was erroneously not included last year.

## Reporting arising from other laws and regulations or generally accepted statements on sustainability reporting

In addition to the sustainability statement according to ESRS, Fluvius includes a GRI table in [appendix](#) to the annual report as an additional framework for sustainability reporting.

## Inclusion through referrals

A number of reporting requirements within the sustainability statement are incorporated by reference to other parts of the annual report, i.e. the [Report by the Board of Directors](#) and the [Financial statements](#). The following information is (partially) incorporated by reference:

ESRS reference	Section
GOV-1 paragraph 21, 22	Composition of governing bodies and management
SBM-3 paragraph 48 e) ii.	Financing of Fluvius
IRO-1 paragraph 53 e)	Risk management
Total/net revenue	Disclosure 2.7 in IFRS report

## Use of phase-in facilities

Fluvius is applying a number of phase-in provisions in the first year of the sustainability statement:

- Comparative information is not reported
- ESRS 2 SBM-3 paragraph 48(e) [intended financial impacts] is only reported qualitatively
- ESRS E1-9 [Intended financial impacts of material physical and transition risks and potential climate opportunities] and ESRS E3-5 [Intended financial effects of impacts, risks and opportunities related to water and marine resources] are omitted for the first year, and only qualitative information is reported for the first three years.



# Governance [GOV]

In this chapter, we highlight Fluvius' governance structure and how it contributes to our sustainability goals. Good governance is essential to ensure transparency, accountability and integrity within our organisation. This framework includes clear roles and responsibilities for the Board of Directors, the Management Committee and other governing, management and supervisory bodies. They have a duty of care towards people and the environment.

To fulfil this promise, they receive information on sustainability performance, these performance indicators are linked to remuneration and are supported with risk management and internal controls. This will enable us to effectively achieve our sustainability goals and contribute to a sustainable future.

## The role of the governing, management and supervisory bodies [GOV-1]

The composition and diversity of our governing, management and supervisory bodies, as well as their roles and responsibilities, are described in the [Composition of governing bodies and management](#) in the management report. In the CSRD report, we explain how these bodies have access to information and expertise on sustainability topics.

The Board of Directors has delegated daily management of the business to the Management Committee. Accordingly, the Management Committee is responsible for monitoring impacts, risks and opportunities. The related policies are managed by the business units and Senior Management.

The CSR Board is responsible for identifying material impacts, risks and opportunities using double materiality analysis. They monitor, manage and maintain an overview of Fluvius' material sustainability topics. The CSR Board is multidisciplinary, consisting of senior managers and executives with expertise in specific areas, and meets monthly. The Management Committee acts as the steering committee for the CSR Board and the strategic commitment to CSR. As the steering group, the Management Committee receives quarterly reports on the progress of sustainability performance and also has the authority to validate targets.

In 2024, the Management Committee decided to recruit a Sustainability Manager at senior management level, who will directly report to the CEO. In 2025, this person will re-evaluate and, if necessary, adjust governance processes, controls and procedures to monitor, manage and oversee impacts, risks and opportunities.

As part of the annual strategy review, the Strategy Division, in close collaboration with the Management Committee, assesses whether the company's mission, vision and strategy remain aligned with the interests, views and expectations of stakeholders. This includes the results of the double materiality analysis. Following the strategy review, an assessment is made as to whether the organisation needs additional skills or expertise to achieve the objectives set. To this end, channels for internal and external support and training are made available on an ongoing basis.

## Information provided to and sustainability matters addressed by the undertaking's governing, management and supervisory bodies [GOV-2]

The Management Committee is informed about sustainability and material impacts, risks and opportunities through several levers:

- **Strategy review:** This annual review of the strategy takes into account the results of the double materiality analysis and is conducted in close collaboration with the Management Committee. The updated strategy is also validated by the Strategy Committee and the Board of Directors.
- **CSR Board steering committee and Strategic Engagement:** As the steering committee, the Management Committee is informed quarterly on the progress of sustainability performance.
- **Divisions:** They drive the policy on sustainability topics and report progress to the Management Committee on a weekly to biweekly basis.
- **Decision Sheets:** Any decision made by the Management Committee should include an understanding of the impact on people and the environment so that these elements can be taken into account in the evaluation.

Fluvius' mission is to connect society in a sustainable way with our multi-utility networks. This sustainable way means that we work for the long term and want to contribute to a better environment and climate. We will also support communities with forward-looking solutions that will provide them with long-term comfort. In the coming years, we want to translate this concern for people and the environment into robust due diligence processes.

As shown in this CSRD report, actions have been taken on all material sustainability topics in the past financial year 2024. Key actions are listed in [MDR-A](#).

## Integration of sustainability-related performance in incentive schemes [GOV-3]

The remuneration of the members of the Management Committee of Fluvius System Operator consists of a fixed and a variable (performance-related) part. The remuneration's performance-related part is based on a set of long-term indicators that are in line with the strategic pillars and related targets. These long-term indicators are reported to the Management Committee on a quarterly basis. In the quarter preceding the next financial year, the performance conditions and the weighting of the indicators are determined by the Management Committee. The performance-based remuneration paid is determined after the end of the financial year on the basis of performance and predetermined conditions.

The long-term indicators are fully linked to sustainability topics. The proportion of the variable remuneration of the members of the Management Committee linked to sustainability targets and/or impacts is therefore 100% of the total variable performance-related remuneration. The following indicators are used:

- Environment:
  - Realisation of investment plans for energy and climate transition
  - Realisation of the LED conversion of public lighting infrastructure
  - Realisation of the 2025 data roadmap in line with the Flemish climate and energy policy
  - Realisation of cooperation within the water sector focused on more efficiency and the challenges of climate change adaptation
- Social:
  - Great Place To Work score
  - Safety results
  - Absenteeism rate
  - Customer satisfaction
  - Customer centric
  - Timely execution of core tasks
- Governance:
  - Managing ESG risks
  - Securing long-term sustainable revenue streams and financing for the energy and climate transition
- Entity-specific topics:
  - Network performance

For members of other governing, management and supervisory bodies, the remuneration is, in accordance with the law, based on attendance at meetings, supplemented by the reimbursement of expenses.

Executives and non-executives can also benefit from a collective bonus under CLA-90 if they achieve pre-defined sustainability targets to which every employee can contribute, such as customer satisfaction, limiting mileage, safety results, etc.



## Statement on due diligence [GOV-4]

Fluvius is committed to a sustainable and just society where respect for people and the environment is central. Our [Strategy](#) and [Culture](#) fully support this. In collaboration with our value chain and stakeholders, we are putting our transition plan and human rights policy into practice. In doing so, we continue to focus on delivering our core tasks and realising the energy transition and climate adaptation, working together on future-oriented networks & systems and always putting the employee and customer first.

The double materiality analysis, carried out in collaboration with stakeholders, has identified material sustainability topics for Fluvius. The identified impacts, risks and opportunities from the entire value chain were assessed for impact materiality and financial materiality. The due diligence processes associated with the different material sustainability topics are explained in this sustainability statement.

Fluvius' due diligence process for material sustainability topics always aims to identify, prevent and mitigate actual and potential negative impacts. By addressing these negative impacts on people and the environment in our own operations and in the upstream and downstream value chain, we aim to continuously mitigate these impacts and consistently improve the conditions and the setting for all stakeholders in the value chain. The scope of these processes includes the community and environment of Fluvius' own employees as well as external parties that have a direct or indirect business relationship with Fluvius.

Applicable regulations with associated targets, (inter)national legislation and guidelines will always guide the due diligence processes and serve as foundations for shaping Fluvius' business processes. We base our strategy for the energy and climate transition on the Flemish Energy and Climate Plan and recognise human rights in our policies, as formulated in international directives and treaties, as well as in national legislation and policy frameworks.

Fluvius implements an independent and easily accessible procedure for reporting, investigating, handling and possibly sanctioning irregularities and violations of applicable human and environmental principles through whistleblowing channels. The integrity of whistleblowers is always and everywhere protected, in line with Fluvius' broader integrity policy.

The core components of due diligence for Fluvius are reflected in this sustainability statement in the following reporting requirements:

- Integrating due diligence in governance, strategy and business model:
  - Information provided to and sustainability matters addressed by the undertaking's governing, management and supervisory bodies [GOV-2]
  - Integration of sustainability-related performance in incentive schemes [GOV-3]
  - Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3]
- Engaging affected stakeholders:
  - Information provided to and sustainability matters addressed by the undertaking's governing, management and supervisory bodies [GOV-2]
  - Interests and views of stakeholders [SBM-2]
  - Description of the processes to identify and assess material impacts, risks and opportunities [IRO-1]
  - Policies adopted to manage material sustainability matters [MDR-P]
- Mapping and assessing negative impacts on people and the environment:
  - Description of the processes to identify and assess material impacts, risks and opportunities [IRO-1]
  - Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3]
- Taking measures to address negative impacts on people and the environment
  - Actions and resources in relation to material sustainability matters [MDR-A]
- Monitor the effectiveness of these efforts:
  - Metrics in relation to material sustainability matters [MDR-M]
  - Tracking effectiveness of policies and actions through targets [MDR-T]

Further explanation of the due diligence processes in relation to people and the environment can be consulted in the following ESRS thematic reporting requirements:

- People: [Own workforce \[S1\]](#), [Workers in the value chain \[S2\]](#), [Affected communities \[S3\]](#), [Consumers and end-users \[S4\]](#)
- Environment: [Transition plan for climate change mitigation \[E1-1\]](#)

## Risk management and internal controls over sustainability reporting [GOV-5]

Fluvius' sustainability reporting is prepared by the Finance Department as part of the company's annual report and approved by the governing, management and supervisory bodies. The reported information has been subject to a limited assurance review by the auditor for the first time for the financial year 2024.

Fluvius conducted an internal audit in 2024 on a selection of sustainability indicators. The findings were reported to the Audit Committee. Building on this, a roadmap will be established in 2025 to achieve improved data quality for all sustainability indicators as reported in the CSRD report. To achieve this, the risk management and internal control system will need to be optimised, so that the scope matches the reporting scope, the right priorities are set, additional mitigation tools are provided, roles and responsibilities for controls are fully aligned with the functions involved and the reporting process is thoroughly documented. This will be reported in a timely manner to the Management Committee as the steering committee for the CSR Board and strategic engagement.







# Strategy [SBM]

Fluvius' overall strategy is embodied in its mission and vision. These give our company direction and are developed in consultation with stakeholders such as employees, customers and partners. Sustainability is an integral part of this.

This chapter provides further insight into the company's business model, the markets in which we operate, the regulatory environment we work in, the assets we manage and the Fluvius value chain.

The results of the double materiality analysis are explained, including a discussion of the material impact and financial implications of the impacts, risks and opportunities for Fluvius.

# Strategy, business model and value chain (SBM-1)

## Strategy

### **Our mission: To sustainably connect society through our multi-utility solutions.**

To be concrete, this means:

- Fluvius connects society. This is not just about the physical connection we make through our networks. We also bring people together. Moreover, Fluvius is there for everyone.
- We connect in a sustainable way. We work for the long term and want to contribute to a better environment and climate. We will also support communities with forward-looking solutions that provide long-term comfort.
- Fluvius is committed to a wide range of utility services because we believe in the economies of scale and synergies that this brings to all our partners and customers.

### **Our vision: Fluvius, together with all stakeholders, aims to become the number one multi-utility company in Flanders.**

Fluvius aims to become THE operating company for most utility sectors in Flanders. When you think of utilities in Flanders, Fluvius should be your first port of call.

We always start with the world around us. We do not work for ourselves, but for all the cities, communities, customers, partners, suppliers and investors that move around us. Only with their support we can grow by meeting their expectations.

And by excelling at what we do, while providing outstanding service.

Everything we do, we do for and with Flemish society. That is why we always seek consultation and cooperation. Openness and transparency are key for us.

To achieve this, we rely on four pillars:

- **Achieving more together:** we ensure more efficiency for Flanders and added value for the customer by realising many more concrete collaborations
- **Future-oriented networks and systems:** within our core tasks, we provide the future-oriented networks and systems needed to realise the energy transition and climate adaptation
- **Customer centric:** in everything we do, we always put the customer central and ensure a smooth, efficient and reliable service
- **Employee focus:** we realise our vision thanks to our competent and responsible employees, whom we put first through shared leadership and a culture of trust.

## Strategic commitments

To give substance to these pillars, a set of 'Strategic Commitments' is delegated by the Management Committee to three Strategic Steering Groups:

- Grid & Systems
- Customers & Markets
- Corporate & Employees

They are responsible for the realisation of these commitments and translate them into concrete targets, so that they can be monitored. For each strategic commitment, there is a responsible person who provides the link to the organisation and a clear deadline for implementing the strategic commitment. The Management Committee is the escalation level for decisions that require adjustment to the strategy. The Strategy Division, together with the Energy and Climate Transition Division, coordinates the whole process and will also challenge the lessons learned to find even better solutions.

The appropriate focus and priorities are then set for each operating year. In 2024, these were set as shown in the figure below:



## Business model

### What services do we offer?

As a network company, Fluvius manages the pipes in the street and the connections of the various utilities. In this way, we bring **electricity** (140,276 km of networks, 3.7 million connections) and **natural gas** (58,002 km of networks, 2.4 million connections) to everyone in Flanders, in 300 cities and municipalities<sup>1</sup>. In many places, we also provide our customers with **sewerage** (87 cities and municipalities) and **heat** (15 cities and municipalities). We manage **public lighting** in Flemish cities and municipalities (+/- 1.2 million lighting points). Since 2020, Fluvius has based its core activities on this strategic choice. These activities include setting up and managing the necessary data platforms directly connected to the various utilities in our role as **data manager**. Fluvius also fulfils the **public service obligations** imposed on it. In addition, Fluvius offers **energy services to local authorities** to support them in their efforts to save energy in municipal buildings<sup>2</sup>.

In addition to its role as network operator, Fluvius also plays the role of supplier in very specific cases. We distinguish three supplier roles:

- **Social supplier:** Residential customers who are dropped by the commercial supplier due to unpaid bills become customers of Fluvius. If the customer does not yet have a digital meter, one is installed as soon as possible and the *prepaid function* for electricity is activated. With *prepaid*, those customers pay in advance for the energy they want to use.
- **Supplier of last resort:** Fluvius is responsible for monitoring access points without a valid supplier contract. Fluvius sensitises grid users to regularise this as soon as possible.
- **Emergency supplier:** If a commercial supplier files for bankruptcy, Fluvius acts as an emergency supplier. The commercial supplier's customers are supplied and invoiced by Fluvius until they have signed a contract with a new supplier. Fluvius acts as a safety net to ensure that customers do not run out of electricity and/or natural gas.

### How do we offer our services?

A significant part of Fluvius' activities (electricity, gas and heat) is **regulated** by the competent energy regulator **VREG** (Vlaamse Regulator van de Elektriciteits- en Gasmarkt). Fluvius' sewerage activities are also regulated at Flemish level, specifically by the **VMM** (Vlaamse Milieumaatschappij). From 1 January 2025, VREG will be renamed Vlaamse Nutsregulator with the same powers. The **Vlaamse Nutsregulator** is expected to take over the regulatory powers of the VMM in the water and wastewater sector from 1 January 2026. This report describes the situation as it was during the reporting period.

Fluvius System Operator is the operating company for 11 Flemish utility companies<sup>3</sup>, all of which have the legal form of an intermunicipal mandated association. They are also the sole shareholders of Fluvius System Operator.

Fluvius acts as an operating company for its shareholders/clients on a cost basis, i.e. no profit margin is charged on the operational tasks performed. Each month, Fluvius charges its shareholders/clients in full for all direct and indirect costs of operations, investments and public service obligations (personnel, contractors, suppliers, financing costs). As a result, the annual accounts of the operating company Fluvius System Operator close with a zero balance, with no profit or loss, but with the exception of the participation in Wyre Holding bv for the activity of public electronic communication networks.

Fluvius System Operator does not own the distribution infrastructure (network infrastructure with cables and pipes, cabins, metering equipment, etc.). This is owned by the various mandated associations.

<sup>1</sup> Due to mergers in cities and municipalities, this number will drop to 285 from 1 January 2025. However, the geographical coverage of the area of operation remains identical.

<sup>2</sup> The Energy Decree has since been amended to abolish this support in relation to energy services from 1 January 2025, with a transitional measure allowing these activities to continue until 31 December 2027 at the latest, provided that these activities have already started by 31 December 2024 at the latest.

<sup>3</sup> From 1 January 2025, some structural changes will come into effect that will leave nine intermunicipal mandated associations.

## What do we do within these services?

Together with its 5,863 employees, Fluvius System Operator is working hard on the energy transition and climate adaptation, because the Flanders of the day after tomorrow must be climate-neutral. That is why we are converting all public lighting to LED lamps. This will reduce energy consumption and CO<sub>2</sub> emissions. We are also digitising and automating the energy network and installing digital meters everywhere. This will make our grids more flexible and bring more renewable energy to everyone. Such a digital grid is also full of valuable data that we manage for our customers and the energy market, because such information is essential for a sustainable energy landscape. We also need to consider climate change. The effects of extreme dry and wet periods are increasing. By investing in sewers, retention ponds and rainwater plans, we are also preparing Flanders for this.

In short, Fluvius works to create a pleasant living environment for everyone, today and tomorrow.

## Activities of subsidiaries

Subsidiary **De Stroomlijn** is the customer communication centre for Fluvius, Farys and De Watergroep. De Stroomlijn is also the first point of contact for IT support for Fluvius employees. They can contact the helpdesk for problems with software, hardware or network connections.



## Our networks

The various networks managed by Fluvius are described below. These are often being managed in a regulated context and the role of Fluvius is clearly defined. Fluvius operates in several markets:

- Electricity and gas market
- Heat and cooling networks
- Market for sewerage
- Market for public lighting

### Electricity and gas market

Fluvius is responsible for the construction, management and maintenance of the distribution networks and associated assets.

#### The electricity network and its assets

The electricity grid consists of a transmission grid (operated by the transmission system operator), a local transport grid (operated by the local transport system operator) and a distribution grid (operated by the distribution system operator). In the following, we refer to the whole of the local transport grid and the transmission grid as the 'transmission grid'.

The distribution grid distributes energy between the transmission system operator's supply point and industrial or domestic customers, both for consumption and for the reception of decentralised production. It is a network of cables and cabins in which high voltage is systematically converted to low voltage. For the purposes of this document, we divide the voltage on the distribution network into several voltage classes as described in the tabel below<sup>1</sup>.

Voltage class	Operating voltage
High voltage	> 1 kV
Low voltage	≤ 1 kV

<sup>1</sup> Defined according to AREI, Book 3, Section 2.3.2 Voltage ranges in alternating current

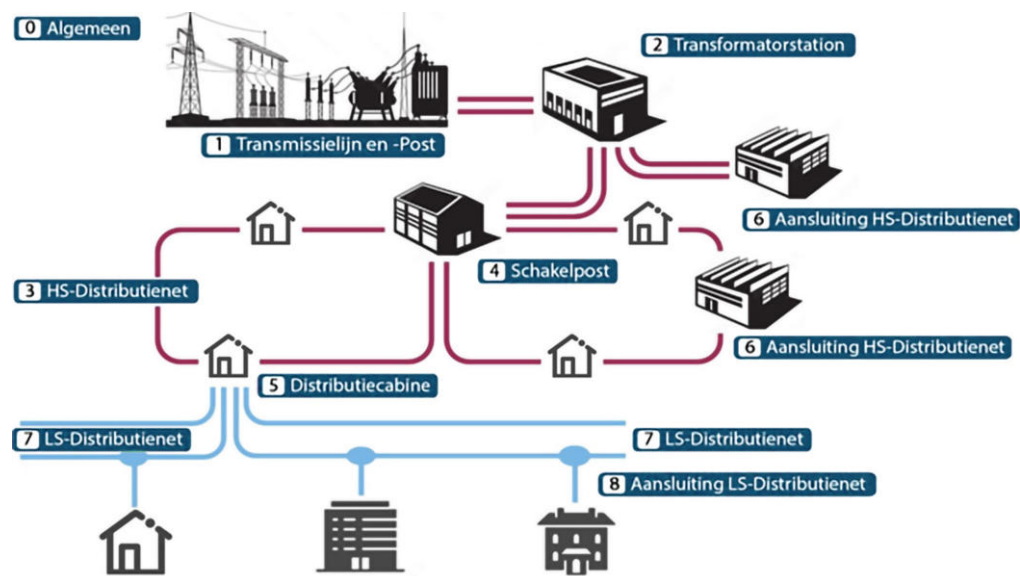
The transformer station [TS] is where electricity from the transmission network is transformed into high voltage on the distribution network. The transformer station houses the transition (interconnection point) between the transmission and distribution networks.

A direct cable connection is made from the transformer substation to a switching post [SP]. The connection is called a high-voltage feeder. The switching post redistributes the power flow to several high-voltage distribution cables, without transforming the distribution voltage.

The set of main connections between transformer stations and switching posts forms the backbone of the high-voltage distribution network.

A high-voltage distribution loop starts from the switching post. Distribution cabins and customer cabins are successively connected to the same high-voltage distribution network. The distribution loop usually ends in the same or in a nearby switching post.

In a distribution cabin, the high voltage of the distribution network is transformed to low voltage and distributed to the low-voltage distribution network. In a customer cubicle, the high voltage is transformed to low voltage via a customer's installation, from which the customer's indoor installation is supplied.



Several low-voltage distribution networks emanate from the distribution cabin, to which the users of the distribution network are connected via a low-voltage connection. The public lighting network is also supplied from the distribution cabin.

The connection passes through a meter to the customer's indoor installation. The meter measures the exchange of electrical energy with the customer.

### The gas network and its assets

The natural gas grid consists of a transport grid operated by the transport system operator and a distribution grid operated by the distribution system operator. The distribution network distributes energy between the the delivery point of the transmission system operator and industrial or domestic customers, both for consumption and for the reception of decentralised production. It is a network of pipelines that systematically changes from medium pressure to low pressure.

The pressure in the distribution network is divided into different pressure classes.<sup>2</sup>

#### Pressure classes

#### Operating pressure

Pressure classes	Operating pressure
Medium pressure C (MDC)	> 5 bar and ≤ 16 bar
Medium pressure B (MDB)	> 0,5 bar and ≤ 5 bar
Medium pressure A (MDA)	> 100 mbar and ≤ 500 mbar
Low pressure	≤ 100 mbar

The natural gas, reduced to medium pressure C (usually by the transmission system operator), is injected into the distribution system via a receiving station (OS). The gas receiving station is the interconnection point between the transport company and the distribution system operator. At the receiving station, the natural gas is measured, odorised (to make it smell) and sometimes reduced to a lower pressure.

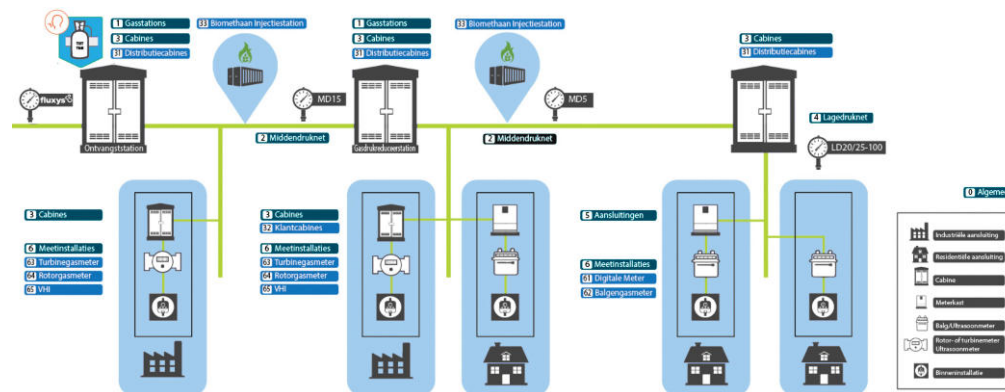
Several physical receiving stations often feed the same interconnected gas distribution grid. These stations are grouped into a fictitious 'aggregated receiving station' (GOS).

The pressure reducing station is part of the equipment of a medium pressure network (MDC) and reduces the pressure to a lower medium pressure (MDB).

A distribution cabin reduces the pressure from medium to low pressure and feeds the low-pressure network. A customer cabin is located at larger individual customers and is connected to the medium pressure network. The customer cabin reduces the pressure from medium pressure to the outlet pressure required by the customer.

Residential customers are usually connected to the distribution grid via a low-pressure connection. In exceptional cases, the connection can also be made to the medium-pressure network. The section of pipes after the meter is called the indoor installation and is the customer's property.

The cathodic protection installations provide active protection for the steel pipes (in addition to the passive protection provided by the coating of the steel gas pipes).



<sup>2</sup> Pressure classes as defined in the 'Code Veiligheid Synergrid'

## Electricity and gas market organisation

The electricity and gas market in Flanders is fully regulated and vertically unbundled.

Unbundling means that the distribution network is operated by a distribution system operator that is independent of the energy suppliers, balancing system operators or shippers and the transmission system operator. Fluvius is the operating company acting in the name and on behalf of all Flemish distribution system operators. The legal competences in the energy sector are divided between the federal and regional levels. Flanders is responsible for distribution, the federal level for transmission and supply.

The VREG (Vlaamse Regulator van de Elektriciteits- en Gasmarkt) appoints distribution system operators for a 12-year period and also has the following tasks:

- **Regulatory tasks**, such as establishing the Technical Distribution Regulations, tariff methodology and the approval of certain contracts and specifications;
- **Supervisory and monitoring tasks**, in order to verify compliance with the relevant legislation (Energy Decree, European network codes, ACER<sup>1</sup> decree, ...);
- **Mediation and settlement of disputes**, for example between the distribution system operator and suppliers or network users;
- **Information tasks**, such as monitoring the energy market and compiling and reporting statistics;
- **Advisory tasks**, such as drawing up opinions and carrying out (or having carried out) studies and research with a view to the development of the regulatory framework.

## Activities of the distribution system operator (DSO)

Fluvius carries out grid management and data management activities on behalf and for the account of all Flemish distribution system operators.

The grid management activities are:

- **Grid development, operation and maintenance:** construction and expansion of a safe, reliable and efficient grid within the area of operation, maintenance of sufficient grid capacity and preventive maintenance and repairs;
- **The connection of grid users** of the low-voltage and high-voltage distribution systems to the distribution system and any adjustment or disconnection of these connections;
- **Providing grid access** to access holders (mostly suppliers);
- **Purchasing electricity** for grid losses;
- **Purchasing electricity and gas** for the role of social supplier and supplier of last resort through transparent and market-based procedures;
- **Combating energy fraud** by actively detecting and taking measures to prevent energy fraud;
- **Purchasing market-based flexibility services** for congestion and support services as an alternative to grid investments;
- **Installing and managing meters**, including the roll-out of digital electricity and gas meters in Flanders.

Distribution system operators and their operating company may also directly or indirectly own, develop, manage and operate, subject to the approval of VREG, the following networks: electronic communications networks, public lighting networks, public sewerage networks, thermal networks (heating and cooling), hydrogen networks<sup>2</sup>, CO<sub>2</sub> networks and other electricity networks whose management has been delegated to them. Distribution system operators and their operating companies may also develop, manage and operate (but not own) water distribution networks.

The development of the distribution network is based on a transparent investment plan that the DSO submits to the VREG twice a year after consultation with stakeholders. The Investment plan contains an investment programme for the renewal and expansion of the grid to meet the capacity needs estimated on the basis of future expectations for a period of three and ten years. This should balance network investment against the purchase of market-based flexibility.

<sup>1</sup> ACER: Agency for the Coordination of Energy Regulators, a decentralised EU agency for cooperation between European energy regulators

<sup>2</sup> Distribution system operators and their operating companies may also directly own, develop, manage and operate hydrogen networks, if they can demonstrate to the VREG that they meet conditions such as a positive cost-benefit analysis and a transfer of assets from the natural gas sector to the hydrogen sector.



The data management activities are:

- **Meter reading** for allocation, reconciliation and billing in the supply market, for the provision of energy services by third parties, for network management and to support energy sharing and peer-to-peer trading;
- **Facilitating the supply market** by managing the access register, managing, processing, securing and storing technical, relational and metering data, and determining and validating the entry and exit of producers and customers connected to the distribution network;
- **Providing data to other parties**, such as other network operators in the context of operational security, parties developing innovative services and products, and market participants and public authorities to assist them in the performance of their duties. In addition, anonymised data may be made available for scientific research;
- **Facilitating flexibility** by collecting and processing information to calculate the flexibility volume and baseline for [certain] flexibility products, and managing the flexibility access register and the flexibility activation register.

By analogy with the Investment plan, a data management plan will be prepared every two years, setting out the investment in data management systems based on future expectations for a period of three and ten years.

In addition to the network management and data management activities mentioned above, the following tasks are legally assigned to the distribution system operators:

- **Act as social supplier, supplier of last resort and emergency supplier** for customers whose supplier terminates the supply contract and who do not find another commercial supplier and for customers of suppliers that lose their supply licence, their access to the grid or in case of bankruptcy or judicial reorganisation;
- **Handling and processing of premium applications** for the payment of premiums for work on buildings, for the promotion of the rational use of energy or for energy production plants;
- **Payment of green power and cogeneration certificate fees** to support the expansion of renewable generation.

Finally, distribution system operators and their operating companies in Flanders are not allowed to own, develop, manage or operate electricity storage facilities, unless they are fully integrated network components and VREG has given its consent. They are also not allowed to produce electricity, unless this is necessary to carry out their activities as network operators. In addition, they may not provide commercial energy services or act as an aggregator, flexibility participant or flexibility service provider.



### Distribution System Operator (DSO) revenues and costs

The revenues of distribution system operators consist of regulated **periodic and non-periodic distribution tariffs**. Periodic charges include fees for network use and data management activities. Non-periodic tariffs relate to one-off interventions such as connections or reinforcements.

Tariffs are set in two stages. First, for each four-year tariff period, the VREG prepares a tariff methodology in accordance with statutory guidelines. Among other things, this should result in:

- **Cost-reflectiveness:** tariffs should reflect actual costs incurred insofar as they correspond to an efficient comparable activity;
- **WACC set by the regulator:** a return on capital invested in regulated assets that allows the necessary investments to be made and financed;
- **No cross-subsidisation** between regulated and non-regulated activities;
- **Incentives for efficiency improvements.**

Based on the tariff methodology, an allowable revenue per distribution system operator is determined.

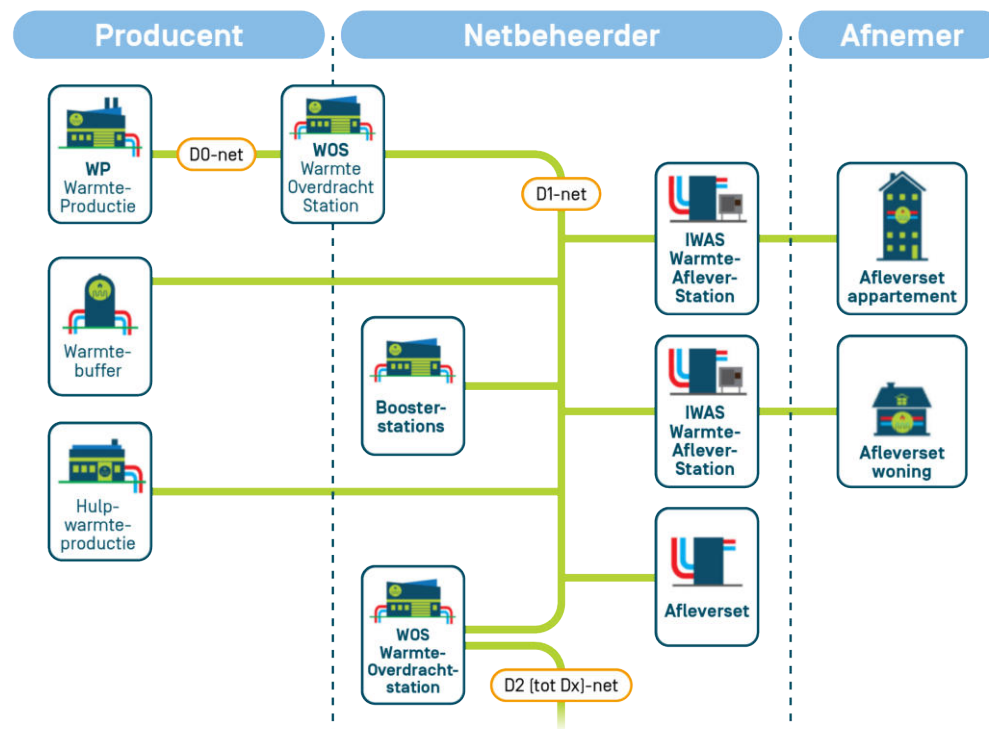
In a second step, the distribution system operators prepare tariff proposals to be approved by the VREG.

The main costs of distribution system operators are the depreciation of network investments (CAPEX) and the operating costs of network operation and data management (OPEX). In addition, network operators are obliged to compensate access holders and network users in certain cases. For access holders, there is a flat fee for late, incorrect or incomplete provision of metering and allocation data. Network users are compensated by law in the event of prolonged power cuts, late installation of digital meters, breakdowns, late connection, breaches of personal data or when the distribution system operator applies technical flexibility. This is flexibility at the request of the distribution system operator in the event of exceptional grid operating conditions where the participation of the grid user is mandatory.

### Market for heat and cooling networks

#### Heat and cooling networks and their assets

Heat and cooling networks are built around renewable (residual) sources, where the network provides the connection to the users. These networks are not interconnected (on a large scale), but can be built as a cascade of different networks.



## Organisation of the heat and cooling market

The market for heat and cooling networks in Flanders is **limitedly regulated and not unbundled**.

Heat and cooling networks are local, scattered across Flanders and not interconnected. Any suitable party can act as a heat or cooling network operator, supplier or producer. There is no legal monopoly and there are no regulated tariffs.

### Activities

A party may have several roles: system operator, supplier and/or producer. A distribution system operator, its operating company or a subsidiary active in the distribution of electricity and/or gas may only temporarily assume the role of producer. The maximum duration is 10 years and may be extended by 60 months at a time if justified.

Fluvius does not currently operate cooling networks, only heat networks. Therefore, only the approach for heat network activities will be mentioned later in this report.

The **heat network operator** has the following tasks:

- to operate and develop the heat network;
- to ensure the capacity to meet the needs of the heat network;
- to maintain the heat network and repair interruptions;
- to manage the plans of the heat network;
- to provide connections;
- to grant access to the heat network;
- to manage the access register;
- to install and manage heat meters;
- to read, process and provide meter data;
- to detect and take action against energy fraud;
- to publish tariffs and conditions for connection;
- to publish tariffs and conditions for access by access holders.

The **heat supplier** is the natural or legal person that sells heat to customers. Its tasks are:

- to supply heat;
- to bill the supply of heat and the use of the heat network;
- to balance the supply and consumption of heat;
- to deal with complaints;
- to ensure social protection measures for household customers.

### Revenues and expenses

The **revenues and expenses** of a network operator, supplier or producer are not regulated and are **determined by commercial supply**.

The system operator of a heat or cooling network must report this to the regulator **VREG** within 30 days of commissioning the network. VREG's tasks with regard to heat and cooling networks are the same as for electricity and gas. The main difference is that there are no regulated tariffs and therefore no tariff methodology. Furthermore, there are currently no technical regulations, nor does VREG have to approve contracts and regulations.

The preparation of an investment plan or a data management plan is not obliged for heat and cooling networks.

## Market for sewerage

### The sewerage network and its assets

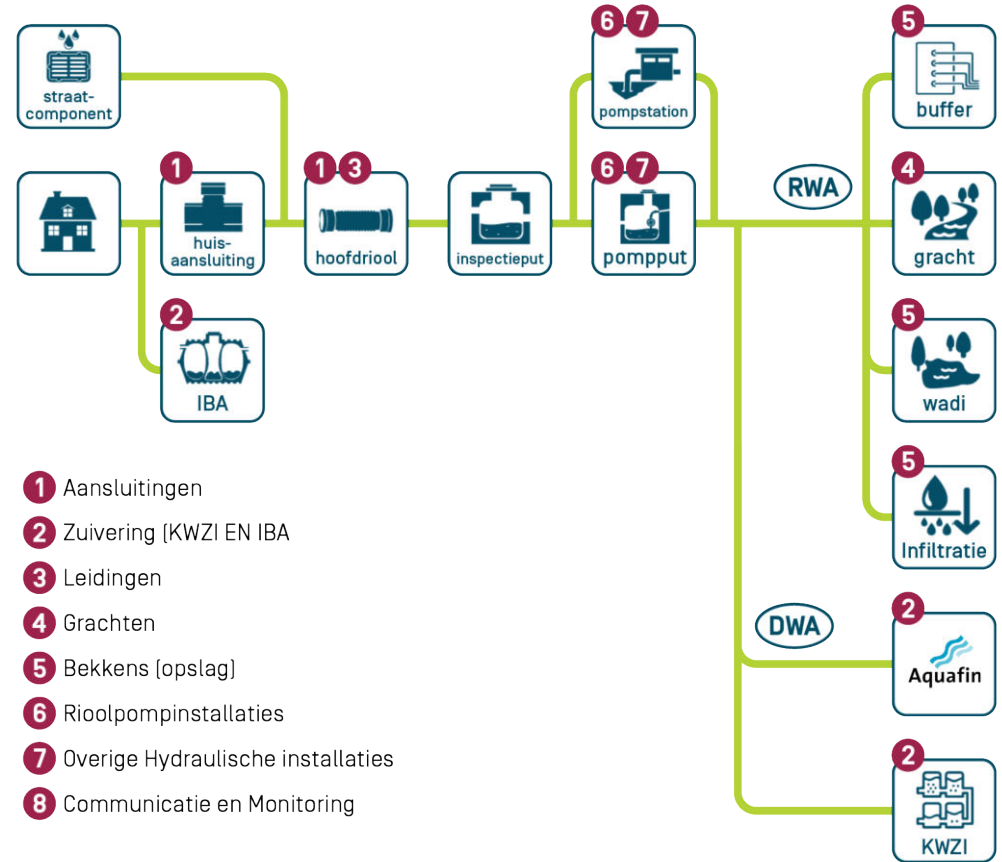
On the one hand, the sewerage system aims to capture, collect and treat domestic wastewater or its equivalent. In the not so distant past, this was done by means of a mixed system to which both sewerage and rainwater were connected. Since it is not possible to treat the entire flow during heavy or prolonged rainfall, hydraulic structures are provided in the sewerage system to regulate the flow to the treatment plant and to optimise the storage capacity in the system (overflow structures, pumping stations, weirs). The highly diluted water, which cannot be stored in the sewerage system, is discharged into surface waters in accordance with legal requirements.

To better protect natural water resources, reduce the demand for drinking water (often groundwater) and improve wastewater treatment, several policy changes have already been implemented in Flanders:

- Since the end of the 20th century, separate networks have been built for rainwater and wastewater.
- Since 2005, rainwater has been retained on private land throughout Flanders as an alternative source of water for applications that do not require drinking water.
- Since 2011, the separation of rainwater and wastewater has been extended to the private domain when sewers are built.
- Since 2014, local infiltration of rainwater has been used. This standardisation was reinforced in 2023.

Rainwater networks focus on infiltration and are also highly localised. In this way, rainwater stays where it falls and has a chance to infiltrate. In this way, we restore the sponge effect of the soil, which helps to combat both drought and flooding. We are also protecting an important source of groundwater nutrients.

## 8 IoT Monitoring



### Organisation of the sewerage market

In Flanders, the wastewater infrastructure is structured on two levels: the supramunicipal level and the municipal level. The municipal wastewater infrastructure collects wastewater and transports it to the supramunicipal wastewater infrastructure. The municipal wastewater infrastructure also includes individual and small-scale treatment infrastructure, where wastewater is treated in accordance with European and Flemish standards. From the takeover point, the supramunicipal wastewater infrastructure transports the collected wastewater to the treatment plant, which is

then part of the supramunicipal wastewater infrastructure. Along the supramunicipal sanitation infrastructure, the municipal actor remains responsible for the collection of wastewater.

The Vlaamse Milieumaatschappij (VMM) is the supervisor of the water chain, including wastewater treatment, in the Flemish Region. It is responsible for the preparation, control and monitoring of the planning of wastewater infrastructure in Flanders and the regulation of water tariffs.

Aquafin was established in 1990 by the Flemish Region to develop, operate and pre-finance the supramunicipal wastewater treatment infrastructure in Flanders. The Flemish Region (through a holding company) is the sole shareholder of Aquafin.

The wastewater infrastructure at the municipal level is regulated by the Decree of 24 May 2002, according to which wastewater treatment at the municipal level is the joint responsibility of the municipalities on the one hand and the drinking water companies on the other. According to Article 6bis §1 of the Decree of 24 May 2002, the drinking water companies are responsible for the treatment of the water they supply to their customers. On the other hand, municipalities can also be considered as having a specific responsibility for the treatment of wastewater in their territory. The drinking water companies can fulfil their obligation by concluding a service contract with the owner/operator of the sewerage system at the municipal level, which may be the municipality itself, a municipal or intermunicipal company or a body appointed by the municipality following a public tender.

Municipalities also have different ways of fulfilling their responsibilities, either by

- taking care of the sewerage network themselves,
- by entering into a partnership with the drinking water companies, or
- by delegating the development and maintenance of the sewerage network to an intermunicipal partnership or (after a public tender) to a third party.

These situations are technically regulated by a contract between the parties involved or by accession through the statutes of the intermunicipal partnership. The VMM supervises sewerage activities.



## Sewerage operator activities

The Decree of the Flemish Government of 23 February 2024 on the municipal wastewater treatment obligation defines the municipal wastewater treatment obligation. It already includes the following activities:

- The development, sustainable management and optimisation of the infrastructure used for the collection, transport and, where appropriate, decentralised or individual treatment, up to the takeover point to the supramunicipal infrastructure, of the following water:
  - Domestic wastewater resulting from the use of water supplied by the operator
  - Household wastewater resulting from the use of water from a private water supply
  - Other water than the water from the previous points for which a discharge into the sewerage system is legally permitted.
- The development, sustainable management and optimisation of the public infrastructure used in the context of the activities referred to in point 1, either for the collection, infiltration, buffering and discharge of rainwater or any other water whose discharge via this infrastructure is legally permitted
- Maximum encouragement for infiltration and buffering via natural pathways or green-blue infrastructure and for the use of rainwater.
- Fulfilment of the obligations laid down in this decree:
  - Preparation of an investment plan
  - Installation of individual treatment plants in accordance with the river basin management plan
  - Development and implementation of a risk-based inspection plan in accordance with the Code of Good Practice
  - Evaluation of the impact of overflows on the most sensitive water bodies designated by the Flemish government
  - Reporting of calamities and other data to the regulatory authority

Fluvius operates as an intermunicipal partnership in municipal wastewater management in Flanders with 29% of the Flemish municipalities, making it the largest municipal wastewater manager in Flanders. It has developed activities in 87 municipalities. Fluvius West, Fluvius Antwerpen, Fluvius Limburg and Riobra are the sewerage network operators. With the Flemish government's final decision on the municipal sewerage obligation, the regulator will monitor municipal sewerage obligations more closely.

## Revenues and expenses of the municipal sewerage authority (DSO)

The revenues of the distribution system operators consist of regulated **periodic and non-periodic distribution network tariffs**. The periodic tariffs include the charges for the use of the network and are collected through the drinking water bill. For own water consumers, the periodic tariffs are collected by VMM in the form of a levy. The periodic tariffs include a fixed component and a component depending on the consumption of drinking water (as an approximation of the wastewater flow). The non-periodic tariffs relate to one-off interventions such as connections and developer fees.

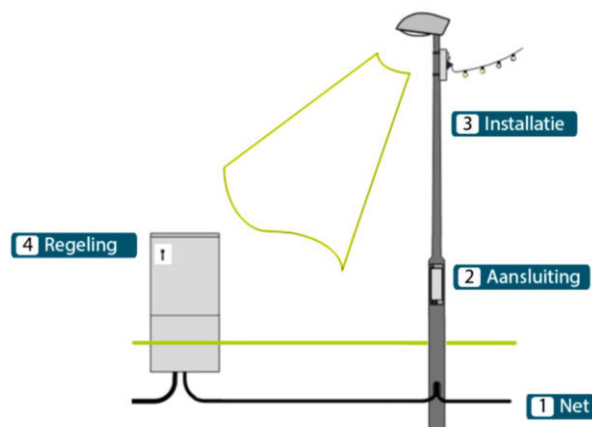
The Flemish Region imposes a ceiling on the periodic tariffs.

## Market for public lighting networks

### The public lighting network and its assets

Public lighting is the lighting along roads, paths, squares, bridges, tunnels and watercourses for which the municipality or an autonomous municipal company is responsible.<sup>1</sup>

The public lighting network is connected to the low-voltage electricity distribution network. A separate board is provided in the distribution cabins to supply the public lighting. The above-ground infrastructure is connected to this network.



### Public lighting network activities

In the field of public lighting, Fluvius is the advising and implementing partner for all Flemish cities and municipalities in the preparation of a master plan for public lighting. This master plan always focuses on the LED conversion of the assets and aims at 'the right light in the right place at the right time'. Together with the cities and municipalities, performance and other requirements are defined in consultation with stakeholders. Once approved, Fluvius will implement the master plan and maintain the infrastructure in the best possible condition.

Fluvius offers a number of different types of lighting:

- Public lighting at the request of the local authority or the autonomous municipal company: functional lighting, monument lighting, beacon lighting and street furniture lighting
- Public lighting for third parties: the types of lighting offered to local authorities and autonomous municipal companies are also offered by Fluvius to third parties (port authorities, universities, etc.)
- Semi-public lighting at the request of local authorities or autonomous municipal companies: architectural and site lighting
- Indoor lighting: part of the Fluvius Sustainable Buildings offer where it concerns the lighting inside municipal buildings such as libraries, swimming pools, sports halls, etc., which are generally run by the municipality or the autonomous municipal company;
- Festive lighting: construction and operation of festive lighting networks up to sockets for connection of festive lighting, the devices and their suspension systems are not offered by Fluvius.
- Traffic Control Systems: Fluvius will continue to offer the operation of existing traffic control systems, but will no longer do so in the event of replacement or a new placement
- Stand-alone systems: These lighting installations are not connected to the lighting network fed by a system managed by the DSO. The installation and operation of stand-alone systems is outside the scope of Fluvius. For this, the municipality must rely on the commercial market of installation companies.
- Exceptions: For existing lighting assets that have been operated by Fluvius but do not meet the above definitions, Fluvius will continue to operate the existing asset. If the asset is irreparably damaged, Fluvius will not renew it.

<sup>1</sup> Definition of 'public lighting' as applied in Flanders pursuant to the Decree of the Flemish Government dated 26 March 2004 establishing the public service obligation imposed on network operators with regard to public lighting, as incorporated in the Energy Decree of 19 November 2010, art. 1.1.1 §2 point 77°.

## Revenue and expenses for public lighting

The distribution system operators have developed a proposal for the municipalities to convert their public lighting infrastructure to LED by 2028. In order to proceed with a conversion, the local government has two options for financing. On the one hand, a local government can choose to provide its own funding. The second option is for the distribution system operator to finance the investment in public lighting in those cities and municipalities that have taken up the 'light-as-a-service' offer. Under the latter proposal, the distribution system operator estimates every three years the investment and operating costs for public lighting for the next three years. On the basis of this budget, it sets a three-year individual flat rate for the municipality or city. The distribution system operator settles the flat rate annually on the basis of the result. After each three-year period, the flat rate is adjusted, if necessary, according to the actual costs and revenues over the past three years.

Energy consumption will remain the responsibility of the municipality or city. Energy consumption will be reduced as LEDs are much more energy efficient than the current equipment.

## Customer profiles

As also explained in [Consumers and end-users \(S4\)](#), Fluvius has the following customer segments:

- Private customers
- Social customers
- Companies
- Municipalities

We serve these customers, who are active in the electricity, gas, heat, sewerage and public lighting markets.

## Employees

Fluvius System Operator carries out the above activities with 5,863 employees, who together provide the best possible service to our various customer profiles. These employees are all based in Flanders.

## Sustainability targets

Fluvius' sustainability goals focus on realising the energy transition and climate adaptation in Flanders. Maintaining the appropriate investment rhythm per utility is a relevant benchmark. We also focus on employees and customers. These elements form an integral part of the company's strategy.

## Activities in the fossil fuel sector

Fluvius is active in the gas distribution sector. In financial year 2024, Fluvius reports a turnover of 410 million euro from this activity. Within the EU taxonomy, a breakdown of the aligned economic activities related to biomethane injection was made.

In addition, Fluvius is not involved in the manufacturing of chemical products, controversial weapons or the cultivation and production of tobacco.

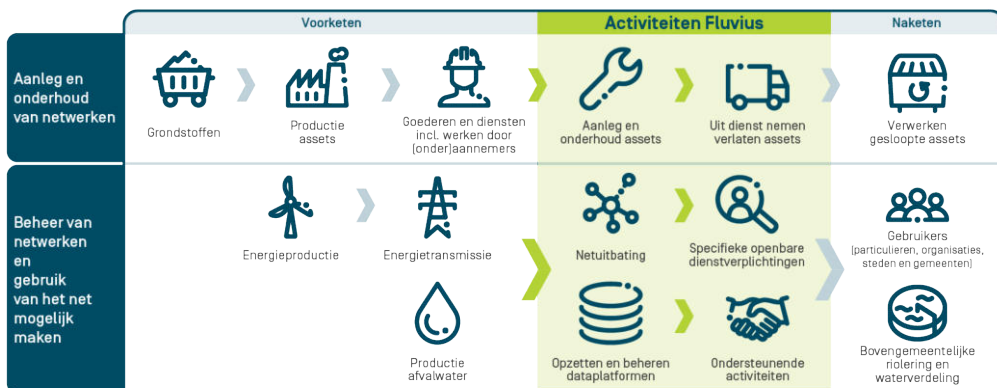


## Value chain

The value chain of Fluvius for the different activities, as defined in the business model and as applied in the double materiality analysis, is shown in the figure below. A distinction was made between network construction and maintenance, on the one hand, and network management and enabling the use of the network, on the other.

Given the defined role of Fluvius, a good understanding of the boundaries between Fluvius and its upstream and downstream chains is essential to correctly assess the scope of impacts. On the one hand, there are the assets built and managed by Fluvius, and on the other hand there is the transported product (fluid) delivered to the Fluvius networks. Fluvius has no influence on the origin of this product.

We note that the value chain rather describes the physical reality. Consequently, organisations in the upstream chain are not always suppliers. For example, the transmission of energy is part of the physical upstream chain, allowing end users to use the output of the network operated by Fluvius. However, TSOs (Transmission System Operators) are not suppliers to Fluvius.



## Our upstream chain (inputs)

The construction and maintenance of our networks requires **raw materials** for the **production of our assets**. These **goods** are procured in accordance with public procurement law. **Services, including work by [sub]contractors**, are also awarded to partners through public tenders. The internal processes for this upstream chain are designed to provide an essential chain of technological and market expertise, asset management, procurement, supplier and contract management.

In the management of our networks and to enable the use of the grid, the upstream chain mainly includes **players who are not necessarily suppliers or contractors of Fluvius**. However, they are part of the physical upstream chain to enable the use of the Fluvius network. Examples include energy suppliers (of electricity, gas and/or heat), TSOs (Transmission System Operators), society and climate as producers of wastewater, ...

## Our own activities

As also defined in the [Business model](#), Fluvius is the operating company that acts on behalf and for the account of all Flemish distribution system operators. Fluvius is active in the fields of network management, data management and a number of legally assigned tasks (specific public service obligations).

For the **construction and maintenance of the assets** in our network, we look after the life of the assets, including research into reuse, up to the **decommissioning of abandoned assets**.

The **operation** of the various networks is one of the main activities within Fluvius. We manage networks for the following utilities:

- Electricity
- Gas
- Heat
- Sewerage
- Public lighting

Our **specific public service obligations** include tasks for the benefit of the community and related to our activities as a network operator:

- Acting as a social supplier, supplier of last resort and emergency supplier
- Processing and handling applications for premiums
- Paying fees for green electricity and cogeneration certificates
- Promoting rational water and energy consumption

As a data manager, we fulfil the tasks assigned to us by **setting up and managing data platforms**.

To facilitate all of the above in-house activities, **supporting activities** have been set up to ensure overall operations.

## Our downstream chain (outputs)

When an asset has reached the end of its life and can no longer be reused within Fluvius' operations, we **process the scrapped assets** with the maximum application of circular principles.

The **users** of the network are the key players in the Fluvius downstream chain. They are our customers and we put them at the centre. The different groups of customers and how we deal with them are described in the chapter [Consumers and end-users \[S4\]](#). We identify the following customer groups:

- Private customers
- Social customers
- Businesses
- Local authorities

Network users expect a reliable network. How we deliver this is described in [Network reliability \[ES1\]](#). For this, we follow the principles of the strategic asset management plan.

Specifically for sewerage activities, **supramunicipal sewerage and water treatment** is the next step in the physical value chain.

## Interests and views of stakeholders [SBM-2]

As a multi-utility, it is essential for Fluvius to engage in stakeholder management and to include the interests and views of stakeholders in the process of shaping our strategy and business model. This is also stated in our vision statement: *'Fluvius, together with all stakeholders, aims to become the number one multi-utility company in Flanders'*. As our strategic pillars also state, Fluvius wants to achieve more by working together in the context of forward-oriented networks and systems, with employees and customers at the centre.

Stakeholders are proactively involved in the operation of Fluvius in various ways. For each external stakeholder, a SPOC and responsible division are appointed to establish and maintain contacts and relationships with the organisation involved.

A distinction is made between stakeholders and key stakeholders. As key stakeholders by definition have a major impact on Fluvius' operations and activities, they are monitored more intensively. Where necessary, cooperation agreements are drawn up.

The main groups of key stakeholders are:

- **Politics:** At the Flemish, federal and European level, Fluvius aims to maintain direct or indirect contact with the political and administrative level in order to obtain a workable legal framework that takes Fluvius' interests into account. The views of advisory councils are followed along with this.
- **Regulators:** Most of Fluvius' activities are regulated by regulators. Therefore, they have a major impact on Fluvius.
- **Suppliers:** Energy suppliers, aggregators, flexibility service providers (FSPs) are an integral part of the market in which Fluvius operates.
- **Network operators:** Various utilities at the distribution and transmission level are regularly consulted with regard to interconnectivity and synergies.
- **Local authorities & provinces:** Local authorities have various roles within Fluvius. They are our shareholders as well as affected partners in our public activities and an important customer segment.
- **Sector organisations:** Partners in the value chain are represented in sector organisations covering various industries such as technology, transport, construction and energy.
- **Employee organisations:** Employees are internal key stakeholders and are represented by the trade unions, with which Fluvius regularly consults.

- **Environmental organisations:** We do not want to damage the environment in which we operate. Environmental organisations are involved to identify potential impacts. We align our visions and strategic lines and work together to raise awareness of the rational use of resources.
- **Organisations representing energy consumers (households & businesses):** Professional and private customers are important customer segments for Fluvius. Companies are represented in employer organisations and households in consumer organisations.
- **Innovation & research institutions:** Through close contacts with these partners, Fluvius closely follows and helps shape technological developments, both in the research phase and in the implementation of innovations.

The main forms of engagement with key stakeholders are:

- Strategic and operational consultations
- Cooperation agreements
- Round tables
- Participation in platforms, networks, working groups, ...
- Advocacy
- Info sessions

Themes on which Fluvius regularly interacts with stakeholders are:

- Policy on energy, climate, environment, ...
- Investment plan for the energy and climate transition
- Memorandum for the elections
- Market operations
- Synergy
- Management of the value chain: including sustainability & innovation
- Employee-centric
- Customer centric

Stakeholder feedback is taken into account in the annual strategy review within the Strategy Division. The Management Committee and the Strategy Committee are closely involved in this process. As part of this process, they are informed of key developments among the various stakeholders, both on sustainability and other current topics. Where necessary, ad hoc measures are also taken to incorporate stakeholder input.

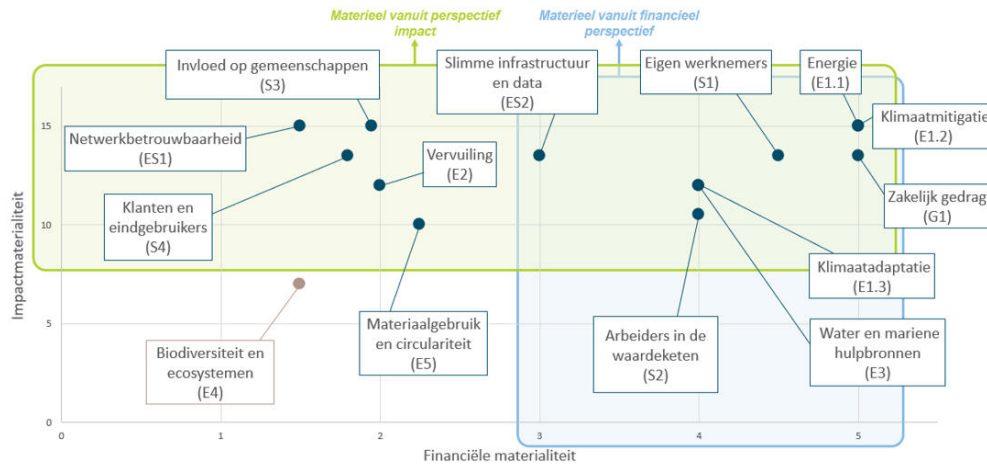


# Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3]

## Results of the double materiality analysis

Fluvius conducted a double materiality analysis in 2023<sup>1</sup> with stakeholders to identify the material impacts, risks and opportunities for the company. The entire value chain was considered. The process of identifying and assessing these material impacts, risks and opportunities is explained in IRO-1.

The material topics are presented in the matrix below, which provides insight into both impact materiality and financial materiality. In addition to the ESRS topics, two company-specific topics have also been identified (network reliability, smart infrastructure and data).



All topics were considered material with the exception of 'Biodiversity and ecosystems'. Given the wide range of activities in Fluvius' business model, this assessment is certainly justified. Materiality is spread across the entire value chain and mainly in the following areas:

- Procurement process in the upstream chain
- Construction and maintenance of networks in own operations
- Management of networks and enabling use of the network in own operations
- Users in the downstream chain

The results of the double materiality analysis have been reported to the Management Committee and the Board of Directors. The actual and intended impacts have been considered in the ongoing development of the strategy and business model. Changes may not be directly attributable to the results of the double materiality analysis, but are always the result of a broader strategy review.

To address some specific material impacts, risks and opportunities, a comparison was made between the material issues and the current vision and strategic commitments. Where additional action was required, working groups were set up to manage these IROs.

## Material impacts

Fluvius' material impacts, both positive and negative, often affect people and the environment, both because of Fluvius' role in the energy and climate transition and because of its strong focus on putting employees and customers central. The impacts are therefore predominantly positive and directly attributable to the company's strategy and business model. As the impacts are mainly current, the expected time horizon is usually short.

<sup>1</sup> There have been no changes in material impacts, risks and opportunities since the last reporting period.

## Financial impacts of material risks and opportunities

The actual and planned financial impacts of the material risks and opportunities are mainly related to the investments required for the energy and climate transition. In addition, material financial effects have also been identified for Fluvius' customers, such as tariffs and affordability, which affect the company's revenue figures.

The main investment plans relate to:

- Energy transition (electricity and gas)
- Sewerage
- Public lighting (LED conversion)

The activity of energy consulting for local governments (ESCO) will be divested following an amendment to the Energy Decree. Energy services will be abolished as of 1 January 2025, with a transitional measure allowing these activities to continue until 31 December 2027 at the latest, provided that these activities have already started by 31 December 2024 at the latest.

The planned sources of funding for the implementation of the strategy are explained in the [Report by the Board of Directors](#).

Fluvius' proactive approach to investment makes it highly resilient in terms of its ability to respond to impacts and seize material opportunities. Within the regulatory framework and the authorised revenues determined by the tariff methodology, Fluvius can provide for long-term financing plans to the maximum extent possible.



# Impact, risk and opportunity management (IRO)

The double materiality analysis is the basis for the preparation of this CSRD report. This chapter explains how this analysis was carried out. This includes a description of the scope, the stakeholders involved, the identification of key topics, the evaluation of the IROs and, finally, the decision making, control and integration into the risk management processes within Fluvius.

The implication for this report is the determination of the material issues to report on. For each topic, reference is made to the main policy principles and measures.

# Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1)

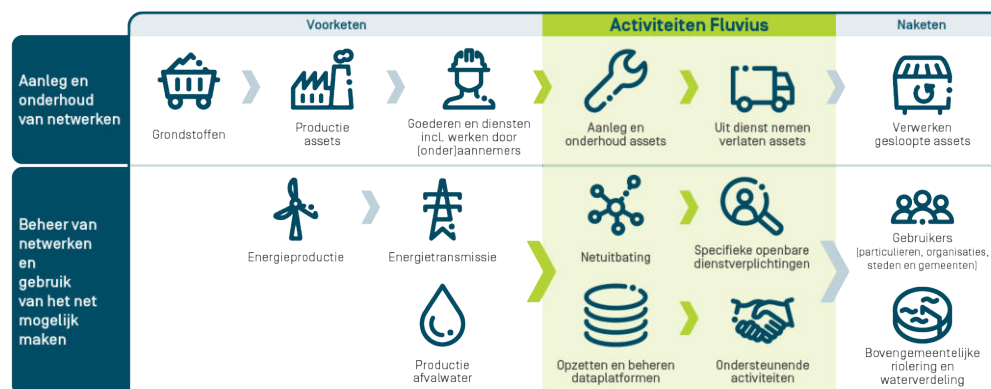
## General process

The double materiality analysis [2023] was conducted according to a structured methodology consisting of five phases:

1. Define purpose, scope and identify stakeholders
2. Identify ESG topics and impacts, risks and opportunities (IROs)
3. Evaluate IROs
4. Validate material topics and IROs
5. Materiality report and knowledge transfer

## Scope

The scope of the analysis is the Fluvius Economic Group, always referred to as 'Fluvius', in line with the scope of the overall CSRD report. The value chain has been included in the analysis to understand any impacts, risks or opportunities between suppliers, service providers and contractors or consumers and end users.





## Stakeholder engagement

By involving multiple internal and external stakeholders in the double materiality analysis, Fluvius ensures that a complete picture is obtained of the IROs that manifest themselves within the organisation's boundaries, and that any IROs that manifest themselves with external stakeholders are also identified. The following stakeholder groups are included in the double materiality analysis:

- Government
- Shareholders & investors
- Employees
- Suppliers
- Customers and consumers
- Environmental organisations
- Local communities
- NGOs

Fluvius' internal experts contribute their experience and knowledge to identify key impacts, risks and opportunities within their area of expertise. The involvement of internal experts is also essential to ensure that the double materiality analysis builds on existing initiatives and programmes to the greatest extent possible. Broad involvement of internal experts also ensures that the results of the double materiality analysis are used to improve the organisation, e.g. by reducing and mitigating negative impacts or risks, or by enhancing positive impacts or opportunities.

Consultation with external stakeholders as part of a double materiality analysis provides a holistic view of the organisation and its value chain. A distinction is made between 'affected stakeholders' and 'users of sustainability reporting'. Some stakeholders may belong to both groups.

- **Affected stakeholders** are those individuals or groups that are or may be affected in a positive or negative way by an organisation's activities, including those in the value chain. Affected stakeholders include employees, suppliers, subcontractors and business partners, customers and industry associations, including employer/employee organisations.
- **Users of sustainability reporting** include investors, lenders, trade unions, NGOs, business partners, regulators and policy makers.

The selection of key external stakeholders was based on the list of stakeholders with whom Fluvius maintains close contact (see also [Interests and views of stakeholders \[SBM-2\]](#)). This list was supplemented with less represented groups. Stakeholders were interviewed either directly or through a SPOC and, where necessary, additional information was gathered through literature reviews. These sources included reports, strategic documents, annual reports, vision documents, news articles and such more. This led to the identification of key topics and IROs.

## Identification of material topics and IROs

The ESRS reporting standards specify which topics should at least be covered in the double materiality analysis. Where a large number of IROs were expected, Fluvius made a further distinction between themes and sub-themes. This was the case within the Climate topic, which was subdivided into 'Climate mitigation', 'Climate adaptation' and 'Energy'. In addition to the sector-agnostic topics, the specific sustainability topics that need to be added in order to get a complete picture of materiality within the company were also identified. 'Network reliability' and 'Smart infrastructure and data' have therefore been added to the topics to be covered.



Once the sustainability topics have been identified, all impacts, opportunities and risks are identified for each topic. As mentioned above, information was gathered through desk research, workshops and interviews with internal and external stakeholders.

## Evaluation of impact materiality and financial materiality

Once the themes and IROs had been identified, each IRO was assigned a score within a set of pre-defined evaluation criteria. This is based on input from the source research and stakeholder consultation. Depending on the IRO category, different scoring criteria apply, as visually illustrated in the figure below. For each criterion, one of the possible response options is selected, corresponding to a quantitative assessment of the IRO within that evaluation criterion. In addition, a qualitative justification is provided to transparently justify why a particular score is selected.

IRO categorie	Beoordelingscriteria				
	Belangrijkheid				
Positieve impact	Actueel	Ernst	Omvang	Herstelbaarheid	Waarschijnlijkheid
	Potentieel				
Negatieve impact	Potentieel				
	Actueel				
Risico				Omvang financiële impact	Waarschijnlijkheid
Opportuniteit					

**Impact materiality** looks at the positive or negative impact that the organisation has or could have on the environment and society for each sustainability topic. This positive or negative impact is assessed based on the severity of the impact and the likelihood of it occurring. Significance is determined by the scale and scope of the impact on the environment and society. For a negative impact, the degree of remediability is also included in the assessment of significance. As noted above, likelihood is also relevant to the assessment of an impact, and more specifically to the assessment of a "potential" impact. For "actual" impacts, likelihood is defined as certain.

In summary, the criteria used to assess the impact materiality are:

- **Severity:** How serious is the impact in terms of intensity and magnitude?
- **Scope:** How widespread is the negative or positive impact? In the case of environmental impacts, scope can be understood as the extent of environmental damage or a geographical perimeter. In the case of human impacts, scope can be understood as the number of people negatively or positively affected.
- **Restorability:** Whether and to what extent the negative impact can be reversed, i.e. the environment or people affected can be restored to their previous state.
- **Likelihood:** How likely is it that the impact will occur?

Within each of the assessment criteria, a rating system is used with an associated score. The impact materiality score is then obtained by taking the sum of the severity, scope and restorability scores and multiplying by the applicable likelihood factor. The total score, after applying the various evaluation criteria and the ESRS calculation formula, determines whether a positive/negative impact is material or not. If the score exceeds 8 out of 15, the impact is considered material.



**Financial materiality** examines the potential financial cash flows that arise or may arise from a sustainability topic. This is described in terms of risks and opportunities. The assessment looks at the magnitude of financial impact and probability (*likelihood*):

- **Magnitude of financial impact:** How large is the financial impact? For example, the magnitude of a financial risk can be caused by an organisation's ability to continue to use or obtain needed resources, their quality and prices, and an organisation's dependence on relationships to continue its organisational processes under acceptable conditions.
- **Probability:** What is the probability of an opportunity/risk occurring after countermeasures have been taken?

The final financial materiality score is obtained by multiplying the financial magnitude score by the factor corresponding to the probability. The total score determines whether an opportunity or risk is considered material or not. If the score is greater than or equal to 3 out of 5, the risk or opportunity is considered material.



Finally, the materiality of the sustainability topic is determined based on the score of all positive and negative impacts, opportunities and risks per sustainability topic. The score of the theme corresponds to the maximum impact and financial materiality score of the underlying IROs. This means that a theme is material, if at least one underlying IRO is material.

## Decision process and internal control

A thorough review of the identified IROs and assessment against the various evaluation criteria was performed to arrive at a validated result. The validation involved internal experts to resolve specific uncertainties or doubtful cases. The result was also validated by the CSR Board. The final result was also submitted to the Management Committee for notice.

## Integration into the risk management process

Fluvius already monitors strategic, tactical and operational risks using an ERM risk management methodology. This also determines the impact (magnitude) and probability for strategic business risks. As a result, there is a large overlap between the required assessment of ESG-related risks and opportunities and the practice already applied by Fluvius within risk management. Consequently, the classification for the analysis of risks and opportunities in the context of the DMA has been linked to the ERM approach. This approach is also explained in the Management Review [Risk management].

## Changes to the process and future iterations

There have been no changes to the double materiality analysis process since the last reporting period. The analysis will be reviewed at an appropriate frequency in the future. This frequency has not yet been determined, but will be aligned with the publication of adjusted reporting standards and best practices (expected frequency two to three years). A new analysis will also be carried out in the event of material changes in the company's strategy or business model. A new double materiality analysis will be conducted no later than 2026. Lessons learned and feedback from the current analysis will be used to improve the process.



# Disclosure requirements in ESRS covered by the undertaking's sustainability statement (IRO-2)

## Material topics

As explained in IRO-1, the following topics have been identified as material for Fluvius in the double materiality analysis and are therefore reported on in the CSRD report:

- Climate mitigation
- Climate adaptation
- Energy
- Pollution
- Water and marine resources
- Material use and recycling
- Own employees
- Employees in the value chain
- Affected communities
- Consumers and end users
- Business conduct
- Network reliability
- Smart infrastructure and data

A full overview of the reporting requirements included in the preparation of the sustainability statement, based on the results of the double materiality analysis, including page numbers where the relevant information can be found, can be consulted in the [appendix](#). A table with references to all data points arising from other EU legislation can also be found in the [appendix](#).

## Biodiversity and ecosystems not material

Only the topic 'Biodiversity and Ecosystems' was found to be non-material for Fluvius. This can be explained by the following insights. Fluvius manages fine-meshed networks whose routes are mostly similar to those of the existing (road) infrastructure. The assets of the various networks are mostly underground, which minimises the impact on biodiversity during the lifetime of the assets. Above-ground infrastructure (cabins, pumping stations) has a limited footprint and is mostly located in an urban context, minimising the impact on natural areas. In addition, Fluvius' (commissioned) works on the various networks, such as dewatering and excavation, are temporary in nature and the environment is always restored to its original state upon completion of the works.

The impact of Fluvius' activities on biodiversity in Flanders is therefore limited, but may be locally relevant. Where required by the legal framework, work on the various networks is subject to a permit application. A biodiversity assessment is always carried out as part of this permit application. If it is determined that there will be an impact on biodiversity, both during installation and during the lifetime of the various assets, the necessary mitigation measures are taken.

Of all the networks managed by Fluvius, the public lighting network has the greatest impact on biodiversity. This is mainly because it is one of the few assets owned by Fluvius that is visible throughout its entire life cycle.

Fluvius' policy on biodiversity and ecosystems is therefore that our minimum objective for biodiversity is to preserve natural values during our work and the operation of our networks. In doing so, we take account of Flemish and European legislation on the preservation and enhancement of natural values. This is supplemented on an ad hoc basis by specific measures and services that can have a positive impact on the health of flora and fauna, if the opportunity arises.

## Policies adopted to manage material sustainability matters [MDR-P]

The table below provides an overview of the policies adopted to manage material sustainability topics. These policies are always adopted following consultation with affected and interested stakeholders.

Sustainability topic	Page numbers policy
Climate change	148-152
Pollution	168-173
Water	181-186
Resource use and circular economy	195-195
Own workforce	211-224
Value chain workers	247-252
Affected communities	261-262
Consumers and end-users	270-271
Network reliability	278-279
Smart data and infrastructure	292-293
Business conduct	305-307

## Actions and resources in relation to material sustainability matters [MDR-A]

The table below provides an overview with references to the description of measures and resources in relation to material sustainability topics.

Sustainability topic	Page numbers measures and resources
Climate change	153-157
Pollution	174-176
Water	187-190
Resource use and circular economy	196-198
Own workforce	230-230
Value chain workers	255-256
Affected communities	265-265
Consumers and end users	275-275
Network reliability	286-287
Smart data and infrastructure	297-299
Business conduct	312-313

# Metrics and targets [MT]

Fluvius uses long-term indicators (LTIs) as a tool to keep a finger on the pulse of both strategic goals and operational performance. For each strategic pillar, measures have been defined with corresponding targets.

The results are reported to the Management Committee on a quarterly basis. Performance is also integrated into the variable remuneration of the Management Committee members, as described in Integration of sustainability-related performance in incentive schemes [GOV-3].

All Fluvius employees have access to an online dashboard where the quarterly results of key indicators are displayed. In this way, we communicate openly and transparently with all Fluvius employees who contribute to the achievement of these goals.

A selection of sustainability indicators is shown on the right.

**996**

Electricity investment budget (million euros, in line with EU taxonomy)

**150**

Sewerage investment budget (million euros, in line with EU taxonomy)

**60.87%**

LED conversion rate

**77%**

Great Place To Work score

**79.44%**

Customer satisfaction



## Metrics in relation to material sustainability matters [MDR-M]

The table below provides an overview of the key metrics for material sustainability topics.

Sustainability topic	Page numbers metrics
Climate change	159-159 and 160-164
Pollution	178-178
Water	192-192
Resource use and circular economy	200-201 and 202-204
Own workforce	232 - 243
Value chain workers	257-257
Affected communities	266-266
Consumers and end-users	276-276
Network reliability	288-289
Smart data and infrastructure	297-299
Business conduct	314-314

## Tracking effectiveness of policies and actions through targets (MDR-T)

The table below provides an overview of the key targets for material sustainability topics.

Sustainability topic	Page number targets
Climate change	158-158
Pollution	177-177
Water	191-191
Resource use and circular economy	199-199
Own workforce	231-231
Value chain workers	257-257
Affected communities	266-266
Consumers and end-users	276-276
Network reliability	288-289
Smart data and infrastructure	297-299
Business conduct	314-314

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# EU Taxonomy

The EU Taxonomy provides a classification system to help identify activities that contribute significantly to sustainable objectives. Eligible activities are checked for each objective to ensure that they meet the criteria, do not cause significant harm to other objectives and meet minimum social guarantees.

For eligible and aligned activities, the proportion of total sales, CapEx (capital expenditure) and OpEx (operating expenditure) that can be attributed to them is reported. This is done for both the Fluvius Consolidated Group and the Fluvius Economic Group.

**74.1%**  
Revenue aligned

Fluvius Economic Group

**82.3%**  
CapEx aligned

Fluvius Economic Group

**79.8%**  
OpEx aligned

Fluvius Economic Group

**83.6%**  
Revenue aligned

Fluvius Consolidated Group

**84.0%**  
CapEx aligned

Fluvius Consolidated Group

**30.3%**  
OpEx aligned

Fluvius Consolidated Group

# EU Taxonomy applied to Fluvius

## Context and obligations

The European Union has developed and published a taxonomy for sustainable business activities<sup>1</sup>. This taxonomy includes six environmental objectives: climate mitigation, climate adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems.

Business activities related to one of these objectives must meet defined technical screening criteria in order to make a significant contribution to the stated objective. They must also not have a significant negative impact on any of the other objectives, according to the principle of "do no significant harm". Finally, at the company level, minimum safeguards must be in place to respect social standards and human rights.

Companies are required to provide quantitative information on the sustainability of their various business activities. Therefore, the degree of sustainability of Fluvius' business activities (measured by the share of total turnover, investments and operating expenses) is presented below in tabular form for both the Fluvius Consolidated Group and the Fluvius Economic Group. The choice of double reporting is based on (1) the specific structure of the group, with one operating company and eleven shareholders/clients, which at the same time own the vast majority of the group's assets, and (2) the fact that sustainability reporting runs in parallel with financial reporting.

In order to comply with the applicable reporting requirements, Fluvius has carried out a thorough analysis of all its business activities. In application of the transparency rule contained in Article 8 of the relevant Regulation, the extent to which these business activities can be classified as environmentally sustainable in terms of turnover, capital expenditure and operating expenditure is reported below. This reporting is applied for the first time in the annual report for the financial year 2022.

## Impact of group structure on EU Taxonomy reporting

Given the specific tasks of Fluvius System Operator as an operating company and the structure of the Fluvius Economic Group, the following observations should be taken into account when interpreting the results of the analysis.

Fluvius System Operator, and by extension the Fluvius Consolidated Group (full consolidation of De Stroomlijn), acts as an operating company for its eleven shareholders/mandated associations belonging to the Fluvius Economic Group. The revenue recorded by the operating company consists of the full charging, without profit margin, to the mandated associations of all investment and operating expenses commissioned by and on behalf of these entities. The Fluvius Consolidated Group has (virtually) no investments of its own and all operating expenses are included in revenue. The relevant figures for revenue, investments and operating expenses used in this analysis are the IFRS figures of the Fluvius Consolidated Group for the financial year 2024.

As for the Fluvius Economic Group, the company intends to voluntarily report on the eligibility and alignment of its business activities with the taxonomy. This reporting will use the IFRS figures of the Fluvius Economic Group for the financial year 2024.

<sup>1</sup> Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on establishing a framework for the promotion of sustainable investments and amending Regulation (EU) 2019/2088

## Eligibility of economic activities

Based on the interpretation of the published list of taxonomy-eligible economic activities for the six objectives, a selection was made based on the following questions:

- Does Fluvius operate in this sector?
- Does the title of the activity match?
- Does the description of the activity match?

If all of these questions are answered in the affirmative, the activity qualifies as a sustainable activity. Then, based on the Fluvius activity portfolio, the activities corresponding to the selected eligible activities are assigned. Supporting documents are included in the reference list. This method achieves a maximum selection of activities. Only those activities that are eligible and actually included in the portfolio are further analyzed.

For both the Fluvius Consolidated Group and the Fluvius Economic Group, the activities are finally identified as "eligible" (listed according to the corresponding activity codes and objectives). This selection and description includes changes with respect to the financial year 2023. New activities have been added regarding biomethane as a renewable gas in our gas distribution networks and regarding the sustainability of our buildings and facilities management. In addition, last year it was incorrectly stated that the activities addressed both climate mitigation and adaptation. This has now been corrected and only the climate mitigation target remains. Finally, a correction is also included regarding the type of substantial contribution. Last year, for activities without a specified type, both "enabling" and "transitional" were incorrectly reported.

The main economic activity of Fluvius, which does not fall under the EU taxonomy, is the activity of gas distribution, except for the part related to the integration of renewable gases in the networks. The developments following the Fluvius Investment plan will ensure that this share will continue to decrease in favour of the economic activity of electricity distribution.

Environmental information (E)

Objective	Reference	Type	Abbreviation	Explanation
CCM	4.9	Enabling	ELEK	Fluvius is responsible for the distribution of electricity through medium and low-voltage networks (owned by the licensed distribution system operators), providing the link between the transmission level and the final consumer.
CCM	4.14	-	RGAS	As a network operator, Fluvius connects injection points for renewable and low-carbon gases to the gas distribution network.
CCM	4.15	-	WARM	Fluvius is actively involved in several district heating projects in Flanders. Our role in district heating projects is mainly focused on the construction and maintenance of the network section, but in order to facilitate such projects, Fluvius can also (temporarily) act as a heat supplier if required.
CCM	4.31	Transitional	WARMGAS	When acting as a (temporary) heat supplier, temporary heat production can be provided using fossil fuels as a source.
CCM	6.4	-	MOB - F	Mobility solutions are provided for employees, including company bicycles.
CCM	6.5	-	MOB - V	Mobility solutions are provided for its own employees. Fluvius is committed to the further electrification of its own fleet of company cars and leased cars for the company's executives.
CCM	7.1	-	FB-NB	Fluvius undertakes new construction projects as part of the company's facility management.
CCM	7.2	Transitional	FB-VNB	Fluvius undertakes renewal construction projects (thorough renovations) within the company's facilities management.
CCM	7.3	Enabling	EEE	Fluvius has been appointed by cities and municipalities to manage their public lighting network. From this task, there is an accelerated conversion of the existing light fixtures to LED light fixtures, in order to achieve significant energy savings. In addition, energy efficiency measures are also being implemented in Fluvius' buildings.
CCM	7.4	Enabling	FB-EV	Fluvius installs EV charging infrastructure on the sites of its own buildings as a function of the electrification of its own vehicle fleet.
CCM	7.5	Enabling	FB-GBS	Fluvius installs measurement, control and monitoring systems for its buildings as a function of energy performance. These are integrated into the general building management system.
CCM	7.6	Enabling	FB-PV	Fluvius installs photovoltaic systems on the grounds and roofs of its buildings. This renewable energy is used only for its own consumption.
CCM	7.7	-	FB-KVG	Buying and selling buildings is an activity that Fluvius carries out according to its own needs for housing and facility management.
CCM	9.3	Enabling	ESCO	Fluvius provides energy efficiency services in buildings owned by member municipalities. It has been decided to phase out this activity. This service will be offered until 31.12.2024, after which only ongoing projects (started no later than 31.12.2024) will be implemented until the end of 2027.
WTR	2.2	-	RIO-DWA	Fluvius builds, maintains and renews municipal sewerage infrastructure as the designated sewerage operator of several cities and municipalities. This involves the separate disposal of rainwater and wastewater, which is separated at source to create a concentrated wastewater stream that is treated by the supramunicipal wastewater operator.
WTR	2.3	-	RIO-RWA	This includes a commitment to separate rainwater from wastewater, creating an additional stream of stormwater available for infiltration or reuse through source separation.

# Alignment of economic activities

## Explanation of the analysis process

According to the applicable regulations, an eligible economic activity is aligned if it cumulatively meets the following three requirements:

- It makes a significant contribution to at least one environmental objective,
- It does not significantly harm the other environmental objectives,
- and it is conducted in compliance with minimum social standards and human rights.

The Delegated Regulation on Climate<sup>1</sup> and the Delegated Regulation on the Environment<sup>2</sup> define the technical screening criteria that an activity must meet in order to significantly contribute to the objective in question. Criteria are also defined to verify that the activity does not seriously jeopardize one of the other objectives (no significant negative impact). Finally, compliance with minimum social standards and human rights must be demonstrated at the company level.

The above analysis was carried out for each of Fluvius' eligible economic activities. In each case, a description of the concrete implementation of the activity was provided, together with the relevant supporting documentation. For each objective, the substantive contribution criteria were listed. A qualitative justification was provided in each case, explaining the interpretation and linking it to the supporting documentation. These serve as evidence that these activities meet the criteria across the organisation. Samples can then be taken on the basis of these documents. This screening process was applied in a similar way to the 'no significant harm' criteria. Minimum social standards and human rights have been verified globally and apply to all activities as these principles are applied throughout the organisation.

<sup>1</sup> Commission Delegated Regulation (EU) 2021/2139 of June 4, 2021 (consolidated version of January 1, 2024).

<sup>2</sup> Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023.

## Analysis of eligible activities

### 4.9 ELEK

Fluvius' distribution network is connected to Elia's transmission network, which in turn is connected to the European electricity network. This activity therefore fulfils criterion **1a**. In addition, the energy mix in Belgium also meets criterion **1b**, as the production capacity on the networks is less than 100 g CO<sub>2</sub>eq/kWh.

To do no significant harm to the objective of pollution prevention, Fluvius follows the principles of the IFC's General Environmental, Health and Safety Guidelines. We also comply with applicable standards and guidelines to reduce the impact of electromagnetic radiation by applying the necessary design guidelines. The use of PCBs (polychlorinated biphenyls) has been banned for transformer suppliers since 1985. Since then, Fluvius can no longer receive transformers that are not PCB-free. However, we still include such a requirement in our technical specifications.

### 4.14 RGAS

Fluvius integrates the connections for biomethane injection into the existing gas distribution network, thus fulfilling criterion **1c**. Indeed, the injection of biomethane makes it possible to increase the share of renewable gases in the distribution system. In addition, Fluvius also fulfils criterion **2**, as it is fully committed to leak detection and the reduction of methane emissions, as explained in the [Policy for avoiding and reducing gas leaks](#). We are a member of OGMP 2.0, which strengthens our commitment in this area.

In order not to do significant harm to the objective of pollution prevention, Fluvius will always opt for energy-efficient components and the best available techniques in its installations. However, the biomethane injection cabins do not contain any components covered by Directive 2009/125/EC.



## 4.15 WARM

The heat networks managed by Fluvius are only built where there is a prospect of a sustainable energy source. This energy source must be able to meet 100% of the heat demand. Alternative installations are only provided as a back-up or temporary solution. This is described in the design guidelines for heat networks. Fluvius therefore meets criterion **a**.

In order not to do significant harm to the objective of pollution prevention, Fluvius will always opt for energy-efficient components and the best available techniques in its installations. In the heat transfer stations, energy efficiency class IE4 or better is required for the components.

### 4.31 WARMGAS

As explained above, Fluvius can provide temporary heat production to feed heat networks where the heat source is a fossil fuel. Given the temporary nature of these activities, no analysis is performed to show that Fluvius meets the criteria. Therefore, we do not claim alignment for this activity.

## 6.4 MOB-F

Fluvius provides bicycles for business trips and leases bicycles for commuting, whether or not as part of the mobility budget. These bicycles can be powered either by the physical activity of the user or by an electric motor. All bicycles in the fleet can use the public infrastructure for cyclists. Fluvius thus fulfils criteria **1** and **2**.

In order not to do significant harm to the objective of a circular economy, the fleet of bicycles is regularly maintained to maximise its lifespan. In addition, a recupel contribution<sup>3</sup> is paid for the batteries in electric bicycles when the means of transport is purchased.

## 6.5 MOB-V

Fluvius has an extensive fleet of vehicles and transport equipment. A roadmap for electrification and reduction of fossil fuel consumption has been developed for each vehicle category. The investments and operating costs considered in the alignment meet criterion **b** and do not emit more than 50 gCO<sub>2</sub>/km.

Passenger cars are provided through leasing contracts, with the leasing company selling the cars on the second-hand market at the end of the contract. In addition, an environmental contribution is paid at the time of purchase (Febelauto) for the recycling of the vehicle. This does no significant harm to the objective of recycling.

In order not to do significant harm to the objective of preventing pollution, Fluvius always requires vehicle tyres to have EPREL label A for noise standards and at least EPREL label B for rolling resistance.

### 7.1 FB-NB

Fluvius' new construction projects will always comply with the minimum standards for new buildings in Flanders, especially in terms of energy management. Fluvius uses the GR0 tool as a basis for the project definition of buildings. This is a tool for measuring and increasing the sustainability of building projects.

In order to do no significant harm to the goal of a circular economy, limits must be monitored with regard to circular construction techniques and the recycling of construction waste. This is currently not verifiable for Fluvius. Therefore, we do not claim alignment for this activity.

<sup>3</sup> The Recupel contribution is the amount paid when purchasing a new electrical or electronic appliance. With the revenues from these contributions, Recupel coordinates and organises the collection, sorting, treatment and recycling of discarded electro-appliances in Belgium.

## 7.2 FB-VNB

As with new construction projects, Fluvius also uses the minimum standards applicable in Flanders for renovation projects (major renovations), in particular with regard to energy management, and we use the GRO tool as a basis for the project definition of buildings. Again, we cannot currently demonstrate that no significant harm is being done to the circular economy objective. Therefore, we do not claim alignment for this activity.

## 7.3 EEE

### Public lighting

Fluvius manages public lighting for all Flemish cities and municipalities. Fluvius aims to completely convert Flanders to LED lighting by the end of 2028. This energy-efficient infrastructure complies with criterion **d**.

### Energy efficiency in buildings

To improve the energy efficiency of its buildings, Fluvius takes various measures, such as installing insulation **(a)**, replacing windows **(b)**, external doors **(c)**, changing lighting in offices and warehouses **(d)**, installing high-performance HVAC systems **(e)** and water-saving measures **(f)**. Investments in equipment used in these applications always have an energy efficiency rating in one of the two highest classes. The operating costs of technical equipment cannot be broken down by energy efficiency class and are therefore reported as non-aligned.

In order to do no significant harm to the pollution prevention objective mentioned in Annex C of the EU taxonomy, these products do not contain any hazardous products. In accordance with current legislation, asbestos inventories of buildings are carried out by recognised specialists. If asbestos is found, it will be removed by an approved company.

## 7.4 FB-EV

Fluvius is installing EV charging infrastructure on the sites of its own buildings as part of the electrification of its own vehicle fleet.

## 7.5 FB-GBS

The costs of building management systems always relate to temperature control **(a)**, building automation and control systems, energy management systems, lighting control systems **(b)**, digital (sub)metering of consumption in the building **(c)** or façade and roof elements with controlled solar shading **(d)**.

## 7.6 FB-PV

Fluvius is installing solar panels **(a)** as a source of renewable energy to meet its own energy needs in our buildings.

## 7.7 FB-KVG

Buying and selling buildings is part of the management of our built heritage. When buildings are bought or sold, they are checked for compliance with the criteria. This means that buildings dated before 31 December 2020 will have at least an EPC A certificate **(1)**. For buildings dated after 31 December 2020, all requirements mentioned in Activity 7.1 (FB-NB) will be met at the time of purchase of the building **(2)**. If the combined capacity of the HVAC systems exceeds 290 kW, the building shall be equipped with an energy performance measurement and analysis system **(3)**.

## 9.3 ESCO

Fluvius provides energy efficiency services to cities and municipalities under an 'Energy Service Company' (ESCO) contract **(e)**. As explained earlier, these services are being phased out. Ongoing contracts will continue to be managed for a limited period of time.

## 2.2 RIO-DWA

The DWA pipes are part of the municipal sewerage network that Fluvius manages as sewerage manager on behalf of the cities and municipalities. Rainwater and drought plans have been drawn up for these cities and municipalities. Flanders has also developed river basin management plans. By collecting pollution loads in the DWA pipes, Fluvius contributes to the European reduction targets for water pollution. This ensures the good status and ecological condition of (ground) waters **(1)**.

The wastewater treatment plants are largely managed by the supramunicipal wastewater manager Aquafin. They also have to obtain environmental permits to carry out their activities. These contain the same elements as the environmental permits of Fluvius, as the applications always go through the environmental counter of the Flemish government. Fluvius only operates small wastewater treatment plants, which of course also have environmental permits **(2)**. There is no wastewater treatment plant managed by Fluvius with a capacity of more than 100,000 population equivalents or a BOD5 of more than 6,000 kg **(3)**.

In order to do no significant harm to the climate protection objective, Fluvius analyses the direct CO<sub>2</sub> emissions from its wastewater activities. These results are available on request. For sludge processing, Fluvius relies on approved processors and does not have its own anaerobic sludge treatment facilities.

## 2.3 RIO-RWA

The RWA pipelines are also part of the municipal sewerage network, which Fluvius manages as sewerage manager on behalf of the cities and municipalities. Rainwater and drought plans are drawn up for each city or municipality, and Flanders provides the river basin management plans. By collecting as much rainwater as possible in the RWA pipes, we are able to replenish the groundwater level. This will ensure the good status and ecological status of (groundwater) bodies **(a)**.

Rainwater and drought plans are always drawn up for the entire surface area of cities and municipalities **(b)**.

When designing sewerage projects, various dimensions are taken into account, including the amount of rainwater that can be collected and returned to the water bodies **(c, i)**.

## Do no significant harm

### Climate adaptation

In order to comply with the climate adaptation criteria listed in Annex A of the EU taxonomy, Fluvius refers to the physical climate risk analysis carried out and the climate adaptation policy and plan described in the chapter [Climate change \(E1\)](#).

### Water

The criteria for water listed in Appendix B of the EU taxonomy are met through the environmental permitting process, where impacts on water bodies are assessed at the time of application and if potential impacts on water bodies are identified, mitigation measures are imposed depending on the project location.

### Circular economy

As explained in our approach around [Waste \(products\)](#), Fluvius has a waste management system that incorporates the principles of the circular economy and the treatment of waste generated is handled by an accredited waste management company. The various waste streams are reported on an annual basis.

### Prevention of pollution

Pollution prevention criteria are specifically mentioned for each activity in the alignment analysis.

### Biodiversity

As with the water criteria, the biodiversity criteria listed in Appendix D of the EU Taxonomy are met through the environmental permitting process, where impacts on biodiversity are assessed at the time of permit application, and where potential impacts on biodiversity are identified, mitigation measures are imposed depending on the project location.

## Minimum safeguards

### Human rights

Respecting and promoting human rights is an integral part of Fluvius' mission and values. Based on core values such as togetherness, pride, engagement, respect and customer centric, Fluvius strives for a just, inclusive and sustainable society. As explicitly stated in our [Due-diligence statement](#) and the Fluvius Human Rights Policy, approved by the Board of Directors and the Management Committee, Fluvius is fully committed to ensuring minimum social safeguards in the conduct of its operations, both for its [own employees](#) and for [employees in the value chain](#), [affected communities](#) and [consumers and end users](#), i.e. the entire value chain. We are committed to the principles and human rights set out in the following guidelines:

- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights
- Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work
- International Bill of Human Rights

No human rights incidents were reported in financial year 2024. Here, we consider violations of the above conventions and guidelines to be in scope. So far, Fluvius has never been involved in an NCP<sup>1</sup> case, but will always offer its active cooperation in the event of any future involvement. Fluvius has also never received a letter from the BHRRC<sup>2</sup>, but will always respond in a timely manner (within three months) if such a letter is received in the future.

### Fair competition

Fluvius' regulated activities as a system operator are subject to the supervision of the appointed regulator and the provisions of the Energy Decree. For non-regulated activities, the Legal Management Department monitors compliance with fair competition rules based on our position in the relevant market. Fair competition training is provided to employees directly involved in these activities.

Information on public procurement and fair competition is available internally to all Fluvius employees. In addition, legal advice on fair competition is available at all times.

It can be confirmed that neither Fluvius nor any of its subsidiaries, nor any member of the Board of Directors or Senior Management of these companies have been convicted of fair competition offences in the past.

### Taxation

Fluvius has put in place the necessary tax policy development and processes. A multidisciplinary team of experts from the Accounting and Legal Departments meets regularly to implement Fluvius' tax obligations. These obligations are constantly evolving and are therefore closely monitored. In the event of new or changed obligations, the multidisciplinary team draws up an action plan to ensure that Fluvius confirms the new obligations as soon as possible. The results are reported to the relevant senior management and strategic decisions are taken if necessary.

The tax structure and implementation are also reviewed by the auditor. The multidisciplinary team also discusses and mitigates the results of this audit. In addition to the auditor's review, the tax authorities may also carry out spot checks to detect tax violations.

### Anti-corruption

Fluvius' business conduct policies and processes are explained in section [G1](#). It describes, among other things, how our Ethical Charter addresses anti-corruption and bribery, how whistleblowing channels are established, how we maintain a proper relationship with suppliers, and our political influence and lobbying activities. In addition, it can be confirmed that neither Fluvius nor any of its subsidiaries, nor any member of the Board of Directors or Senior Management of these companies have been convicted of corruption or bribery offences in the past.

<sup>1</sup> NCP: National Contact Points

<sup>2</sup> BHRRC: Business & Human Rights Resource Centre

## Results

The table below summarises the results of the screening process for the alignment of eligible activities. Only for the aligned activities and projects will the KPIs for revenue, CapEx and OpEx be calculated and included in the final reporting tables.

Objective	Reference	Type	Abbreviation	SCC	DNSH	MSS	Aligned
CCM	4.9	Facilitating	ELEK	Yes	Yes	Yes	Yes
CCM	4.14	-	RGAS	Yes	Yes	Yes	Yes
CCM	4.15	-	WARM	Yes	Yes	Yes	Yes
CCM	4.3	Transition-supporting	WARMGAS	No	No	Yes	No
CCM	6.4	-	MOB - F	Yes	Yes	Yes	Yes
CCM	6.5	-	MOB - V	Yes (partially)	Yes	Yes	Yes (partially)
CCM	7.1	-	FB-NB	Per project	No	Yes	No
CCM	7.2	Transition-supporting	FB-VNB	Per project	No	Yes	No
CCM	7.3	Facilitating	EEE	Yes (partially)	Yes	Yes	Yes (partially)
CCM	7.4	Facilitating	FB-EV	Yes	Yes	Yes	Yes
CCM	7.5	Facilitating	FB-GBS	Yes	Yes	Yes	Yes
CCM	7.6	Facilitating	FB-PV	Yes	Yes	Yes	Yes
CCM	7.7	-	FB-KVG	Per project	Yes	Yes	Per project
CCM	9.3	Facilitating	ESCO	Yes	Yes	Yes	Yes
WTR	2.2	-	RIO-DWA	Yes	Yes	Yes	Yes
WTR	2.3	-	RIO-RWA	Yes	Yes	Yes	Yes

## Calculation method of the KPIs

For both the Fluvius Consolidated Group and the Fluvius Economic Group, the share of 'eligible' and 'aligned' economic activities is calculated relative to the total.

### Consolidated Group

KPI	Numerator	Denominator
Turnover	Percentage of customer revenue from aligned activities in the denominator	Revenue from contracts with customers cf. note 2.7 from the relevant IFRS accounts.
CapEx	Purchases of company vehicles and leasing cars (tangible fixed assets and lease obligations related to rolling stock)	Sum of the heading 'acquisitions' in intangible assets, tangible assets and lease liabilities cf. notes 10, 11 and 12 from the relevant IFRS accounts.
OpEx	Cost of renting cars and bicycles	Sum of rent and rental expenses cf. note 5 from the relevant IFRS accounts.

### Economic Group

KPI	Numerator	Denominator
Turnover	Percentage of customer revenue from aligned activities in the denominator.	Revenue from contracts with customers cf. note 4 from the relevant IFRS accounts.
CapEx	Net investments in (non-)grid-related activities eligible or aligned with EU taxonomy	Sum of heading 'acquisitions' in intangible assets, tangible assets and lease liabilities cf. notes 13, 14, 15 from the relevant IFRS accounts.
OpEx	All operating expenses for the EU taxonomy-eligible activities for which CapEx was recognised, excluding depreciation, capital losses and recoveries, plus the rental of cars and bicycles	All operating expenses for activities for which CapEx was recognised, excluding depreciation, capital losses and recoveries, plus the rental of passenger cars and bicycles cf. note 6 from the relevant IFRS accounts.

## Performing calculations

The figures shown were provided by the Fluvius Accounting & Controlling Departments. They have compiled these figures on the basis of the data available in the company's accounting systems (IFRS accounting for both Fluvius System Operator consolidated and Fluvius Economic Group). Intercompany amounts have been eliminated. The extent of 'eligible for EU taxonomy' and 'aligned with EU taxonomy' was determined in consultation with the Fluvius Investor Relations Department, using the applicable criteria. Where necessary for a correct interpretation, specialists within the company were consulted for additional clarification.

The financial model distinguishes the different economic activities of Fluvius into segments with asset classes and cost types. According to the eligible and aligned activities, a selection is made according to the scope of the KPIs to be reported. The figures are reported in accordance with the official tables prescribed by the relevant European Commission regulations<sup>1</sup>.

## General quality assurance

The identification of eligible economic activities in both directions was based on a bottom-up selection. A selection was made both from the list of activities in the EU taxonomy and from the Fluvius portfolio. The identified economic activities were grouped as closely as possible to the defined portfolio activities to avoid double counting. This allows us to take advantage of segment reporting within the Fluvius financial model.

The financial source data of the EU Taxonomy are derived from Fluvius' general ERP system, SAP, and were checked by the auditor prior to the processing of these data in the EU taxonomy.

<sup>1</sup> *Commission delegated regulation (EU) 2021/2139 of 4 June 2021 and Commission delegated regulation (EU) 2021/2178 of 6 July 2021*

# EU Taxonomy tables

## Fluvius Consolidated Group

### Turnover Consolidated Group

2024				Substantial Contribution Criteria						DNSH criteria ('Does Not Significantly Harm')						Minimum Safeguards (17)	Taxonomy aligned proportion of turnover, Year N-1 (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
Economic Activities (1)	Code (2)	Absolute turnover (3)	Proportion of Turnover (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)				
Text		Euro	%	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>				<b>83.6%</b>															
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																			
Urban Waste Water Treatment	WTR 2.2	€ 95,481,121.09	3.5%	N/EL	N/EL	Y	N/EL	N/EL	N/EL	Y	Y		Y	Y	Y	Y	3.6%		
Sustainable urban drainage systems (SUDS)	WTR 2.3	€ 103,937,495.65	3.8%	N/EL	N/EL	Y	N/EL	N/EL	N/EL	Y	Y		Y	Y	Y	Y	3.6%		
Transmission and distribution of electricity	CCM 4.9	€ 1,881,621,672.87	69.2%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	65.6%	E	
Transmission and distribution networks for renewable and low-carbon gases	CCM 4.14	€ 533,334.05	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.0%		
District heating/cooling distribution	CCM 4.15	€ 19,607,953.07	0.7%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	1.2%		
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	€ 144,236,440.81	5.3%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	4.5%	E	
Professional services related to energy performance of buildings	CCM 9.3	€ 28,126,986.70	1.0%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.9%	E	
<b>Turnover of environmentally sustainable activities (Taxonomy-aligned) [A.1]</b>		<b>€ 2,273,545,004.24</b>	<b>83.6%</b>	<b>76.3%</b>	<b>0.0%</b>	<b>7.3%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>79.3%</b>	<b>75.6%</b>	<b>0.0%</b>
<b>A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																			
<b>Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) [A.2]</b>		<b>€ -</b>	<b>0.0%</b>																



Environmental information (E)

2024				Substantial Contribution Criteria							DNSH criteria ('Does Not Significantly Harm')					Category [transitional activity] [20]	Category [enabling activity] [19]	Taxonomy aligned proportion of turnover, year N-1 [18]	Minimum Safeguards [17]
Economic Activities [1]	Code [2]	Absolute turnover [3]	Proportion of Turnover [4]	Climate Change Mitigation [5]	Climate Change Adaptation [6]	Water [7]	Pollution [8]	Circular Economy [9]	Biodiversity and ecosystems [10]	Climate Change Mitigation [11]	Climate Change Adaptation [12]	Water [13]	Circular Economy [15]	Pollution [14]	Biodiversity [16]				
<b>Total [A.1+A.2]</b>		<b>€ 2,273,545,004.24</b>	<b>83.6%</b>																
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
Turnover of Taxonomy-non-eligible activities		€ 444,989,995.76	16.4%																
<b>Total [A+B]</b>		<b>€ 2,718,535,000.00</b>	<b>100.0%</b>																

### CapEx Consolidated Group

2024				Substantial Contribution Criteria						DNSH criteria ('Does Not Significantly Harm')									
Economic Activities (1)	Code (2)	CapEx (3)	Proportion of CapEx (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Taxonomy aligned proportion of CapEx, year N-1 (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
<i>Text</i>		<i>Euro</i>	%	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>			<b>88.8%</b>																
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																			
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	€ 14,187,678.05	84.0%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	21.9%		T
<b>CapEx of environmentally sustainable activities (Taxonomy-aligned) [A.1]</b>		<b>€ 14,187,678.05</b>	<b>84.0%</b>	<b>84.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>		<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>21.9%</b>	<b>0.0%</b>	<b>84.0%</b>
<b>A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																			
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	€ 805,822.21	4.8%																
<b>CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) [A.2]</b>		<b>€ 805,822.21</b>	<b>4.8%</b>																
<b>Total [A.1+A.2]</b>		<b>€ 14,993,500.26</b>	<b>88.8%</b>																
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
CapEx of Taxonomy-non-eligible activities		€ 1,890,499.74	11.2%																
<b>Total [A+B]</b>		<b>€ 16,884,000.00</b>	<b>100.0%</b>																

## OpEx Consolidated Group

2024				Substantial Contribution Criteria						DNSH criteria ('Does Not Significantly Harm')									
Economic Activities (1)	Code (2)	OpEx (3)	Proportion of OpEx (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Taxonomy aligned proportion of OpEx, Year N-1 (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
<i>Text</i>		<i>Euro</i>	%	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>			<b>31.9%</b>																
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																			
Operation of personal mobility devices, cycle logistics	CCM 6.4	€ 110,526.34	2.3%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	1.7%		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	€ 1,369,258.90	28.0%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	14.0%		T
<b>OpEx of environmentally sustainable activities (Taxonomy-aligned) [A.1]</b>		<b>€ 1,479,785.24</b>	<b>30.3%</b>	<b>30.3%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>		<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>15.7%</b>	<b>0.0%</b>	<b>28.0%</b>
<b>A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																			
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	€ 78,693.04	1.6%																
<b>OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) [A.2]</b>		<b>€ 78,693.04</b>	<b>1.6%</b>																
<b>Total [A.1+A.2]</b>		<b>€ 1,558,478.28</b>	<b>31.9%</b>																
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
OpEx of Taxonomy-non-eligible activities		€ 3,331,910.60	68.1%																
Total [A+B]		€ 4,890,388.88	100.0%																

## Fluvius Economic Group [voluntary information]

### Turnover Economic Group [voluntary information]

2024				Substantial Contribution Criteria						DNSH criteria ['Does Not Significantly Harm']									
Economic Activities (1)	Code (2)	Absolute turnover (3)	Proportion of Turnover (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Taxonomy aligned proportion of turnover, year N-1 (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
<i>Text</i>		<i>Euro</i>	<i>%</i>	<i>Y;N;N/EL</i>	<i>Y;N;N/EL</i>	<i>Y;N;N/EL</i>	<i>Y;N;N/EL</i>	<i>Y;N;N/EL</i>	<i>Y;N;N/EL</i>	<i>Y/N</i>	<i>Y/N</i>	<i>Y/N</i>	<i>Y/N</i>	<i>Y/N</i>	<i>Y/N</i>	<i>Y/N</i>	<i>%</i>	<i>E</i>	<i>T</i>
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>			<b>74.5%</b>																
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																			
Urban Waste Water Treatment	WTR 2.2	€ 39,736,105.30	1.6%	N/EL	N/EL	Y	N/EL	N/EL	N/EL	Y	Y		Y	Y	Y	Y	1.7%		
Sustainable urban drainage systems (SUDS)	WTR 2.3	€ 43,255,370.54	1.8%	N/EL	N/EL	Y	N/EL	N/EL	N/EL	Y	Y		Y	Y	Y	Y	1.7%		
Transmission and distribution of electricity	CCM 4.9	€ 1,715,314,013.16	69.6%	Y	N/EL	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	71.9%	E	
Transmission and distribution networks for renewable and low-carbon gases	CCM 4.14	€ 853,165.40	0.0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.0%		
District heating/cooling distribution	CCM 4.15	€ 4,341,132.59	0.2%	Y	N/EL	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.1%		
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	€ 9,456,826.63	0.4%	Y	N/EL	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.4%	E	
Professional services related to energy performance of buildings	CCM 9.3	€ 11,441,916.84	0.5%	Y	N/EL	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.9%	E	
<b>Turnover of environmentally sustainable activities (Taxonomy-aligned) [A.1]</b>		<b>€ 1,824,398,530.46</b>	<b>74.1%</b>	<b>70.7%</b>	<b>0.0%</b>	<b>3.4%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>76.7%</b>	<b>70.5%</b>	<b>0.0%</b>
<b>A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																			
Acquisition and ownership of buildings	CCM 7.7	€ 11,466,218.10	0.5%																
<b>Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) [A.2]</b>		<b>€ 11,466,218.10</b>	<b>0.5%</b>																
<b>Total [A.1+A.2]</b>		<b>€ 1,835,864,748.56</b>	<b>74.5%</b>																
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
Turnover of Taxonomy-non-eligible activities		€ 626,950,251.44	25.5%																

Environmental information (E)

2024			Substantial Contribution Criteria							DNSH criteria ['Does Not Significantly Harm']									
Economic Activities (1)	Code (2)	Absolute turnover (3)	Proportion of Turnover (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Taxonomy aligned proportion of turnover, year N-1 (18)	Category [enabling activity] (19)	Category [transitional activity] (20)

### CapEx Economic Group (voluntary information)

2024				Substantial Contribution Criteria						DNSH criteria ('Does Not Significantly Harm')							Taxonomy aligned proportion of CapEx, year N-1 (18)		Category (enabling activity) (19)	Category (transitional activity) (20)
Economic Activities (1)	Code (2)	CapEx (3)	Proportion of CapEx (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	%	E	T	
<i>Text</i>		<i>Euro</i>	%	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T	
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>			<b>84.3%</b>																	
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																				
Urban Waste Water Treatment	WTR 2.2	€ 71,908,230.51	4.6%	N/EL	N/EL	Y	N/EL	N/EL	N/EL	Y	Y		Y	Y	Y	Y	4.6%			
Sustainable urban drainage systems (SUDS)	WTR 2.3	€ 78,276,850.02	5.0%	N/EL	N/EL	Y	N/EL	N/EL	N/EL	Y	Y		Y	Y	Y	Y	4.6%			
Transmission and distribution of electricity	CCM 4.9	€ 995,640,421.64	63.2%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	55.5%	E		
Transmission and distribution networks for renewable and low-carbon gases	CCM 4.14	€ 2,572,993.23	0.2%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.0%			
District heating/cooling distribution	CCM 4.15	€ 2,594,778.13	0.2%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.5%			
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	€ 16,225,076.04	1.0%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.0%		T	
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	€ 126,672,337.74	8.0%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	7.0%	E		
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	€ 2,187,238.80	0.1%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.0%	E		
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM 7.5	€ 67,151.26	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.0%	E		
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	€ 357,473.91	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.0%	E		
<b>CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		<b>€ 1,296,502,551.28</b>	<b>82.3%</b>	<b>72.8%</b>	<b>0.0%</b>	<b>9.5%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>72.2%</b>	<b>71.4%</b>	<b>1.0%</b>	
<b>A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																				
Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system	CCM 4.31	€ 2,690.54	0.0%																	
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	€ 19,100,434.29	1.2%																	
Construction of new buildings	CCM 7.1	€ 11,355,870.55	0.7%																	

Environmental information (E)

2024				Substantial Contribution Criteria						DNSH criteria ('Does Not Significantly Harm')									
Economic Activities (1)	Code (2)	CapEx (3)	Proportion of CapEx (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Taxonomy aligned proportion of CapEx, year N-1 (18)	Category [enabling activity] (19)	Category [transitional activity] (20)
Renovation of existing buildings	CCM 7.2	€ 31,549.74	0.0%																
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	€ 325,152.63	0.0%																
<b>CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) [A.2]</b>		<b>€ 30,813,007.21</b>	<b>2.0%</b>																
<b>Total [A.1+A.2]</b>		<b>€ 1,327,315,558.49</b>	<b>84.3%</b>																
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
CapEx of Taxonomy-non-eligible activities		€ 248,060,441.51	15.7%																
<b>Total [A+B]</b>		<b>€ 1,575,376,000.00</b>	<b>100.0%</b>																

**OpEx Economic Group (voluntary information)**

2024				Substantial Contribution Criteria						DNSH criteria ['Does Not Significantly Harm']									
Economic Activities (1)	Code (2)	OpEx (3)	Proportion of OpEx (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Taxonomy aligned proportion of OpEx, Year N-1 (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
<i>Text</i>		<i>Euro</i>	%	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>			<b>81.6%</b>																
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																			
Urban Waste Water Treatment	WTR 2.2	€ 14,781,183.89	6.0%	N/EL	N/EL	Y	N/EL	N/EL	N/EL	Y	Y		Y	Y	Y	Y	5.5%		
Sustainable urban drainage systems (SUDS)	WTR 2.3	€ 16,090,293.23	6.5%	N/EL	N/EL	Y	N/EL	N/EL	N/EL	Y	Y		Y	Y	Y	Y	5.5%		
Transmission and distribution of electricity	CCM 4.9	€ 148,178,859.48	60.3%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	58.7%	E	
Transmission and distribution networks for renewable and low-carbon gases	CCM 4.14	€ 52,537.22	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.0%		
District heating/cooling distribution	CCM 4.15	€ 405,999.42	0.2%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.5%		
Operation of personal mobility devices, cycle logistics	CCM 6.4	€ 112,529.62	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.04%		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	€ 960,426.51	0.4%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.0%		T
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	€ 15,480,355.99	6.3%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	5.5%	E	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	€ 32,921.31	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.0%	E	
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM 7.5	€ 4,557.45	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.0%	E	
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	€ 3,621.75	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL		Y	Y	Y	Y	Y	Y	0.0%	E	
<b>OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		<b>€ 196,099,664.12</b>	<b>79.8%</b>	<b>67.2%</b>	<b>0.0%</b>	<b>12.6%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>75.7%</b>	<b>66.6%</b>	<b>0.4%</b>
<b>A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																			
Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system	CCM 4.31	€ 829,219.30	0.3%																
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	€ 701,184.68	0.3%																



Environmental information (E)

2024				Substantial Contribution Criteria							DNSH criteria ('Does Not Significantly Harm')								
Economic Activities (1)	Code (2)	OpEx (3)	Proportion of OpEx (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Taxonomy aligned proportion of OpEx, year N-1 (18)	Category [enabling activity] (19)	Category [transitional activity] (20)
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	€ 2,867,355.28	1.2%																
<b>OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b>		<b>€ 4,397,759.26</b>	<b>1.8%</b>																
<b>Total (A.1+A.2)</b>		<b>€ 200,497,423.38</b>	<b>81.6%</b>																
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
OpEx of Taxonomy-non-eligible activities		€ 45,209,468.31	18.4%																
<b>Total (A+B)</b>		<b>€ 245,706,891.69</b>	<b>100.0%</b>																

## Disclosure of information relating to nuclear and fossil gas activities

Fluvius does not finance, build, refurbish or operate energy production facilities (electricity or gas), but does connect them to distribution grids, which only provides an indirect exposure. In both the Fluvius Consolidated Group and the Fluvius Economic Group, no revenue, CapEx or OpEx can be allocated to activities related to nuclear energy or electricity generation or cogeneration using fossil gaseous fuels.

However, depending on the operation of heat networks, Fluvius may act as a temporary heat supplier. This may include temporary heat sources that produce heat using fossil gaseous fuels. Within the Fluvius Economic Group, CapEx and OpEx can be allocated to these installations. The revenue Fluvius receives from heat-related activities is not directly allocated to heat production, but to heat distribution in activity 4.15.

### Template 1: Nuclear and fossil gas related activities

	Fluvius Consolidated Group	Fluvius Economic Group
<b>Activities related to nuclear energy</b>		
The company conducts, finances or has exposure to research, development, demonstration and rollout of innovative power generation facilities that produce energy from nuclear processes with minimal fuel cycle waste.	No	No
The company conducts, finances or has exposure to the construction and safe operation of new nuclear facilities for the production of electricity or process heat, for district heating or industrial processes such as hydrogen production, among others, as well as the improvement of their safety, using the best available technologies.	No	No
The company conducts, finances or has exposure to the safe operation of existing nuclear facilities producing electricity or process heat, for district heating or for industrial processes such as the production of hydrogen from nuclear energy, among others, as well as the improvement of their safety.	No	No
<b>Activities related to fossil gas</b>		
The company conducts, finances or has exposure to the construction or operation of power generation facilities that produce electricity from fossil gaseous fuels.	No	No
The company performs, finances or has exposure to the construction, renovation and operation of combined heat/cold and power plants using fossil gas fuels.	No	No
The company conducts, finances or has exposure to the construction, renovation and operation of heat generation facilities that produce heat/cold using fossil gaseous fuels.	No	Yes

**Template 2: Taxonomy-aligned economic activities (denominator)**

Economic activity	CapEx Economic Group						OpEx Economic Group					
	CCM+CCA		Climate Change Mitigation [CCM]		Climate Change Adaptation [CCA]		CCM+CCA		Climate Change Mitigation [CCM]		Climate Change Adaptation [CCA]	
	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
4.26	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
4.27	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
4.28	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
4.29	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
4.30	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
4.31	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	€ 1,296,502,551	82.3%	€ 1,296,502,551	82.3%	€ -	0.0%	€ 196,099,664	79.8%	€ 196,099,664	79.8%	€ -	0.0%
<b>Total applicable KPI</b>	<b>€ 1,575,376,000</b>	<b>100.0%</b>	<b>€ 1,575,376,000</b>	<b>100.0%</b>	<b>€ 1,575,376,000</b>	<b>0.0%</b>	<b>€ 245,706,892</b>	<b>100.0%</b>	<b>€ 245,706,892</b>	<b>100.0%</b>	<b>€ 245,706,892</b>	<b>0.0%</b>

**Template 3: Taxonomy-aligned economic activities (numerator)**

Economic activity	CapEx Economic Group						OpEx Economic Group					
	CCM+CCA		Climate Change Mitigation [CCM]		Climate Change Adaptation [CCA]		CCM+CCA		Climate Change Mitigation [CCM]		Climate Change Adaptation [CCA]	
	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
4.26	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
4.27	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
4.28	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
4.29	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
4.30	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
4.31	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	€ 1,296,502,551	82.3%	€ 1,296,502,551	82.3%	€ -	0.0%	€ 196,099,664	79.8%	€ 196,099,664	79.8%	€ -	0.0%
<b>Total applicable KPI</b>	<b>€ 1,296,502,551</b>	<b>82.3%</b>	<b>€ 1,296,502,551</b>	<b>82.3%</b>	<b>€ -</b>	<b>0.0%</b>	<b>€ 196,099,664</b>	<b>79.8%</b>	<b>€ 196,099,664</b>	<b>79.8%</b>	<b>€ -</b>	<b>0.0%</b>

**Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities**

Economic activity	CapEx Economic Group						OpEx Economic Group					
	CCM+CCA		Climate Change Mitigation [CCM]		Climate Change Adaptation [CCA]		CCM+CCA		Climate Change Mitigation [CCM]		Climate Change Adaptation [CCA]	
	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
4.26	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
4.27	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
4.28	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
4.29	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
4.30	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%	€ -	0.0%
4.31	€ 2,691	0.0%	€ 2,691	0.0%	€ -	0.0%	€ -	0.0%	€ 829,219	0.3%	€ -	0.0%
Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	€ 30,810,317	2.0%	€ 30,810,317	2.0%	€ -	0.0%	€ 4,397,759	1.8%	€ 3,568,540	1.5%	€ -	0.0%
<b>Total applicable KPI</b>	<b>€ 30,813,007</b>	<b>2.0%</b>	<b>€ 30,813,007</b>	<b>2.0%</b>	<b>€ -</b>	<b>0.0%</b>	<b>€ 4,397,759</b>	<b>1.8%</b>	<b>€ 4,397,759</b>	<b>1.8%</b>	<b>€ -</b>	<b>0.0%</b>

**Template 5: Taxonomy non-eligible economic activities**

Economic activity	CapEx Economic Group		OpEx Economic Group	
	CCM+CCA		CCM+CCA	
	Amount	%	Amount	%
4.26	€ -	0.0%	€ -	0.0%
4.27	€ -	0.0%	€ -	0.0%
4.28	€ -	0.0%	€ -	0.0%
4.29	€ -	0.0%	€ -	0.0%
4.30	€ -	0.0%	€ -	0.0%
4.31	€ -	0.0%	€ -	0.0%
Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	€ 248,060,442	15.7%	€ 45,209,468	18.4%
<b>Total applicable KPI</b>	<b>€ 248,060,442</b>	<b>15.7%</b>	<b>€ 45,209,468</b>	<b>18.4%</b>

## Discussion of the results

Key figures for both the Consolidated Group and the Economic Group are shown in the tables below.

### Summary table Consolidated Group

KPI	Total	Eligible	Aligned
Turnover	€ 2,718,535,000.00	83.6%	83.6%
CapEx	€ 16,884,000.00	88.8%	84.0%
OpEx	€ 4,890,388.88	31.9%	30.3%

### Summary table Economic Group

KPI	Total	Eligible	Aligned
Turnover	€ 2,462,815,000.00	74.54%	74.08%
CapEx	€ 1,575,376,000.00	84.25%	82.30%
OpEx	€ 245,706,891.69	81.60%	79.81%

The increase in the percentage of aligned activities in both turnover, CapEx and OpEx is due to increased efforts in the energy transition, climate adaptation and LED conversion. On the other hand, additional activities related to biomethane injection and sustainable buildings were also taken into account. Improvements have also been made to the process of allocating alignment in activity 6.5.

Fluvius does not set specific targets under the KPIs of the EU taxonomy. We see the reporting of these figures as a result of our investment plans for energy transition, climate adaptation, LED conversion and sustainable buildings. These investment plans will ensure that the KPIs will evolve over the coming years. The share of electricity distribution will increase compared to gas distribution. Besides, additional investments in sewerage networks will also ensure an increased share. The share of energy-efficient equipment will decrease after the completion of the LED conversion. These developments will be further monitored in the annual report and in the EU taxonomy reporting.



# Climate Change (E1)

Climate change is one of the biggest challenges of our time, and at Fluvius we take our responsibility in this seriously. We facilitate the energy transition and climate adaptation in Flanders and aim to be carbon neutral ourselves by 2050. In this chapter, we discuss our strategies and initiatives to decarbonise and increase our resilience.

As part of the double materiality analysis, the topic of climate change was divided into three sub-themes within which different IROs were identified and assessed as material: climate mitigation, climate adaptation and energy.

**-7.1%**

Evolution of CO<sub>2</sub> emissions (scope 1 & 2) in 2024 compared to base year 2020

**9.1%**

Evolution of CO<sub>2</sub> emissions (scope 3) in 2024 compared to base year 2023

**46%**

Percentage of climate-related KPIs in variable remuneration Management Committee



# Material impacts, risks and opportunities

## Subtopic: Climate mitigation

IRO description	IRO type
Where economically feasible, heat networks are prioritised.	Impact positive
We help supply Flemish buildings with green energy.	Impact positive
We help to green the Flemish car fleet.	Impact positive
Greenhouse gas emissions: scope 1, 2, 3; including energy losses (electricity/lighting/cable) and impact greenhouse gas leakage.	Impact negative
Risk of stranded assets for gas networks and risk of accelerated depreciation with increased costs to end customers.	Risk
Investment required to support climate mitigation in Flanders.	Opportunity

## Subtopic: Climate adaptation

IRO description	IRO type
Enabling climate adaptation for customers and consumers (e.g. increased energy demand for cooling)	Impact positive
Development of rainwater plans for municipal authorities	Impact positive
We prepare for alternative solutions that help avoid overloading the sewerage system and the consequences thereof	Impact positive
Increased focus on droughts and floods and increased budgets for sewerage projects	Opportunity

## Subtopic: Energy

IRO description	IRO type
We prepare for alternative solutions that help avoid grid investment.	Impact positive
We are committed to the complete and smart conversion of public lighting to LED.	Impact positive
We are redesigning power grids to maximise the use of renewable energy.	Impact positive
We enable energy savings on a large scale through the digital energy meter.	Impact positive
We ensure that customers can participate in renewable energy trading (energy sales, energy sharing, energy communities).	Impact positive
We provide increased receiving capacity for local production of the customer.	Impact positive
Decrease in gas demand and pressure on affordability tariffs and working resources to keep the network operational.	Risk
More extreme peaks in energy consumption and related challenges to the operability of the network.	Risk
Lack of regulatory framework for management of heat networks.	Risk
Investment required to support energy transition.	Opportunity

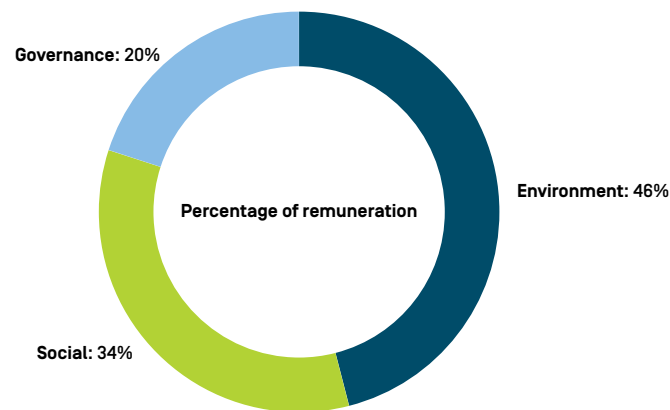
## Integration of sustainability-related performance in incentive schemes [E1.GOV-3]

Climate change considerations are incorporated into the remuneration of the Management Committee members through LTIs (Long Term Indicators), as defined in the [Integration of sustainability-related performance in incentive schemes \[GOV-3\]](#). The results of these LTIs are measured against targets.

The climate-related LTIs include performance related to:

- Collaboration on concrete innovation applications in function of value added for the realisation of our investment plans
- Concrete cooperation in the water sector in function of increased efficiency in Flanders and the challenges of climate adaptation
- LED conversion rate of public lighting
- Number of digital meters rolled out
- Realisation of roadmap data in line with the Flemish climate and energy policy
- Realisation of the Investment plan for energy and climate transition
- Sewerage investments in line with Flemish climate policy
- Network performance

In the financial year 2024, 46% of the total recognised remuneration was related to the above-mentioned climate considerations.



# Transition plan for climate change mitigation (E1-1)

## Principles applied

Fluvius' transition plan for climate mitigation is based on a number of principles:

- **Comprehensive scope:** not only the activities Fluvius has a direct impact on, such as core and supporting activities, are included in the transition plan, but also activities from the organisation's entire value chain are part of this transition plan.
- **Alignment with the Paris Climate Agreement:** The transition plan has – as a minimum guideline – the principles and objectives set out in the Paris Climate Agreement. It explicitly takes into account the objective of achieving a maximum global temperature increase of 1.5°C through the intended decarbonisation strategies.
- **Focus on core activities:** the chosen strategy focuses on reducing greenhouse gas (GHG) emissions from core activities, in particular the distribution of electricity, natural gas, heat and sewerage, rather than focusing solely on non-core activities.
- **Accelerated reduction:** the focus is on accelerating the reduction of CO<sub>2</sub> emissions by adopting the principles of the Science-Based Targets Initiative (SBTi) in the transition plan.
- **Partnering:** knowledge building and innovation are crucial to develop new techniques and technologies needed for the energy transition and decarbonisation strategy; partnerships with knowledge institutions, industrial partners and value chain suppliers are the building blocks for a joint accelerated GHG reduction.

## Targets

Our ambition is clear: to achieve carbon neutrality across all our operations and value chains by 2050 at the latest.

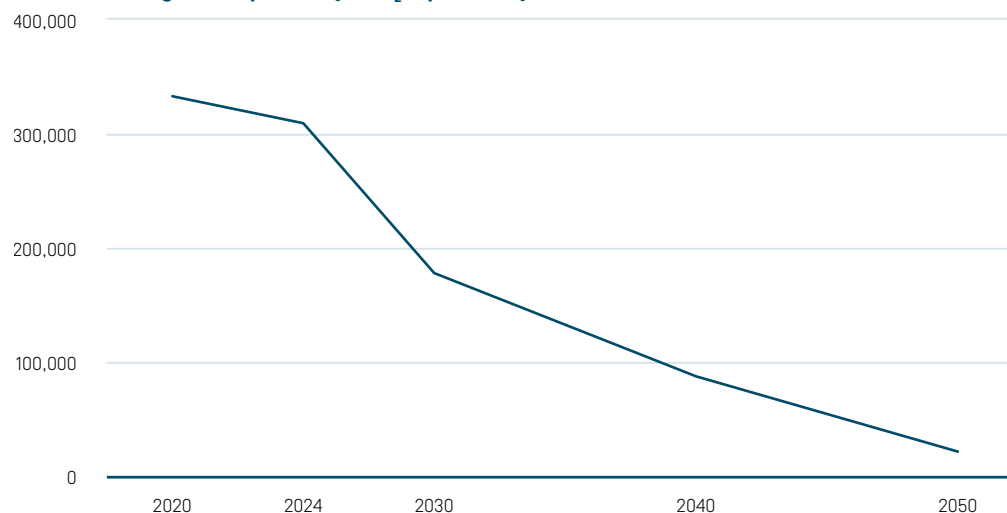
We are segmenting this ambition according to our (in)direct impacts:

- for core and supporting activities, we accelerate our 2040 target for climate neutrality (scope 1 & 2)
- for the entire value chain, we maintain a target of 2050 (scope 3)

For core and supporting activities, we use CO<sub>2</sub>eq emissions of 2020 as a baseline. In line with the expectations of the Paris Climate Agreement and the SBTi Protocol, an accelerated reduction of 47% in CO<sub>2</sub>eq emissions is targeted by 2030. By 2040, we aim to be carbon neutral, offsetting CO<sub>2</sub>eq emissions that are not avoided.

For activities in our value chain, we use CO<sub>2</sub>eq emissions of 2023 as a baseline. Through partnerships and gradual contractual changes with suppliers and contractors, we will gradually reduce CO<sub>2</sub>eq emissions. In this way, we aim to make all construction sites carbon neutral and decarbonise all materials, goods and services supplied. The ultimate goal is to achieve an end-to-end carbon neutral value chain by 2050.

Reduction targets scope 1 & 2 (in CO<sub>2</sub> equivalent)



We cannot currently claim these targets as SBTi-compliant, as SBTi does not recognise Fluvius as eligible. This is due to our activities in the gas distribution sector. In fact, SBTi has put all commitments and validation of targets from the fossil fuel sector on hold until further notice. SBTi is working on a policy for the oil and gas sector. Fluvius is monitoring this work and will always explore the possibility of having the targets recognised as SBTi-aligned, should the opportunity arise.

Scope	Value	Compensation	Base year	2024	2030	2040	2050
Scope 1 & 2 <sup>1</sup>	Tonnes of CO <sub>2</sub> -eq emissions	100% from 2040	332,918	309,259	177,862	87,320	21,315
	Reduction			7%	47%	74%	94%
Scope 3	Tonnes of CO <sub>2</sub> -eq emissions	TBD	991,917	1,082,400	-	-	49,596
	Reduction			-9.1%	-	-	-

<sup>1</sup> For scope 2 the market-based emissions were accounted. In E1-6 both the market- and location-based emissions are reported.

## Decarbonisation levers

### Scope 1 & 2

#### Sustainable transport

A gradual phase-out of fossil-fuelled vehicles is planned. For leased vehicles, full electrification is planned by 2030 at the latest; for service vehicles, electrification depends on the availability of this type of vehicle. As an interim solution, alternative fuels are being considered for vehicles over 3.5 tonnes. In addition, alternative means of transport (e.g. bicycles, car-pooling) and reducing consumption by optimising transport movements are targeted. The use of carbon-free energy for the consumption of electric vehicles is maximised. All charging activities at Fluvius sites are carried out with 100% carbon-free energy.

#### Housing & Energy

All Fluvius buildings will be energy neutral by 2050. From 2040, no fossil fuels will be used to heat buildings. Buildings will be made more energy efficient through optimisation. These targets will be anchored in the roadmap for our buildings towards 2040 and 2050.

#### Electricity distribution network

By 2030 at the latest, 100% of the electricity consumed by public lighting facilities will be decoupled from grid losses. By 2030, 2040 and 2050, grid losses are expected to decrease in relative terms through optimisations and efficiency gains in the grid and materials used. From 2030, an increase in the decarbonisation share of grid losses is initiated, with the aim of 100% decarbonisation by 2050.

#### Gas distribution network

From 2020, Fluvius uses the new and more efficient calculation method for methane emissions in the gas distribution network according to the OGMP 2.0 protocol (Oil & Gas Methane Partnership). This is in line with the EU Methane Regulation. In the coming years, there will be an increasing focus on better and more frequent monitoring of methane emissions and on optimising the gas network. Efforts will also be made to prevent damage to third parties. These measures should lead to a gradual reduction in methane emissions. The possible downsizing of the gas distribution network (depending on political decisions and the social context) may also have an impact on gas distribution losses. It is also assumed that biogas injections will increase.

#### Heat

For heat networks, a roadmap will be developed to phase out fossil heat sources by 2050, in line with the EU Energy Efficiency Directive.

#### Sewerage

For sewerage, the first step will be to make a correct carbon calculation and set targets together with the sector organisations. In addition, improvements will be made leading to a gradual relative reduction in emissions per connected inhabitant. In the short term, the number of connected inhabitants will increase following our efforts to obtain the targets for sewerage connection rates, which will also lead to a temporary increase of emissions.

#### SF<sub>6</sub>

Sulphur hexafluoride (SF<sub>6</sub>) is a high GWP (Global Warming Potential) gas used in high and medium voltage electrical equipment. However, its environmental safety risk and impact are high. For this reason, Europe is imposing a mandatory phase-out. Fluvius is following these targets and deadlines as required by law and will eventually achieve a reduction. In the short term, there will still be consumption due to the amount of materials needed to implement the energy transition, which will lead to a temporary increase of emissions.

#### Compensation

There are several options for offsetting the remaining emissions, such as buying carbon credits, investing in carbon capture & storage projects or planting forests. As a back-up, the offsetting strategy will be further explored and developed in the coming years up to 2026.

### Scope 3

For Scope 3, the main focus of greenhouse gas emissions is on purchased materials and services. Therefore, this is the main focus when defining actions.

With regard to the reduction targets for materials and services, we emphasise the importance of partnerships with the various actors within the value chain. Fluvius is therefore entering into consultations with the various actors in order to arrive at a joint approach to achieving the above action points.

Fluvius wants to enable and encourage the different actors to develop their own carbon strategy in line with the Fluvius strategy. Examples include exploring the potential of the CO<sub>2</sub> performance ladder in procurement documents for works and setting up a data exchange of CO<sub>2</sub> emission data with the various suppliers in the form of a material passport. This will also enable Fluvius to make more accurate and detailed calculations of scope 3 emissions within the value chain. Ultimately, the aim is to integrate this decarbonisation strategy into the procurement process for both materials and services. The first step will be to prioritise the planned procurement files, focusing on those with the greatest potential impact.

Extensive preliminary analysis of these procurement files, close monitoring of the market situation and consultation with the various partners in the value chain will make it possible to implement CO<sub>2</sub> targets in these procurement files in the medium term.

In general, the aim is to achieve zero emissions for construction sites and carbon neutrality for materials by 2050 at the latest.



## Locked-in GHG emissions

Fluvius has locked in the greenhouse gas emissions<sup>1</sup> resulting from its gas distribution activities. The Flemish government has already taken some policy measures that will lead to a reduction in natural gas consumption, but there are no legal indications towards a complete phase-out of natural gas. The future of the gas network depends on future political decisions. Fluvius is examining various scenarios to determine the technical and financial impact on gas operations and is consulting with stakeholders. Fluvius also continues to allocate budget for research and participation in pilot projects on new CO<sub>2</sub>-neutral gas forms, such as biomethane and green hydrogen.

A gradual phase-out of fossil gas distribution is expected. As a result, Fluvius' investment plan no longer includes additional funds for further gas network expansion. Only investments related to legal obligations regarding security of supply for grid users and safe access to the grid are still planned and budgeted. The Gas Plan is therefore a 'keep-it-running' plan.

As long as Fluvius is unable to fully phase out the gas distribution networks, greenhouse gas emissions, mainly methane emissions due to network losses, will continue to occur. This may have an impact on decarbonisation targets.

## Investments

### Investment plan for energy transition

Fluvius wants to prepare the Flemish energy distribution networks for the next 10 years. With the drive towards climate neutrality in 2050 and all the associated developments in mobility, heating of buildings, industrial processes and production of renewable energy, the electricity grid will play an increasingly important role in the coming years. But what will this mean for our energy networks? And what financial effort will be required? We outline this in our [Investment Plan 2024-2033](#).

We are opting for 'no regret' investments in electricity networks and a 'keep it running' strategy for gas networks. In this way, we will not run into short-term problems or make unnecessary investments. The current Investment plan includes a budget of 4 billion euros, of which 3 billion euros will be spent on reinforcing the low-voltage distribution network and 1 billion euros on reinforcing the high-voltage distribution network. For the gas network, Fluvius will continue to guarantee a reliable and safe supply of energy. However, we are limiting investments in the gas network wherever possible. The investment budget for gas networks will continue to decline in the coming years due to the expiry of a number of political regulations and investment programmes (introduction of digital gas meters, conversion from low-calorific to high-calorific gas).

To better assess further investment needs up to 2050, we are investing in measures to

- closely monitor how the actual load on the grid evolves and to process refined scenarios. The digital meter is an important tool for this.
- develop alternative solutions, such as the capacity tariff and flexibility services.

In this way, we aim to reduce the gap between "no regret" investments by 2033 and further investments towards 2050. The pace of investment may be slowed or accelerated depending on future developments or adjustments in energy policy, in consultation with our stakeholders.

<sup>1</sup> Locked-in GHG emissions refer to emissions from existing infrastructure and technologies that are difficult to change without significant investment or structural change.

## Investment plan climate adaptation

Heavy rainfall and longer droughts are consequences of climate change that we as a society need to become increasingly resilient to. As wastewater manager, Fluvius is investing in 87 Flemish cities and municipalities to strengthen the wastewater infrastructure. We are increasing the capacity of the system, the level of connection and the amount of pollution load collected. In this way, we prevent watercourses from being polluted and contribute to the reduction targets mentioned in [Targets related to water \(E3-3\)](#). Examples of projects include the renewal of pipes, the separation of wastewater flows, the construction of buffer and infiltration basins, the creation of rainwater and drought plans, the digitalisation of the sewerage network in accordance with an intelligent control system that takes into account weather conditions, etc.

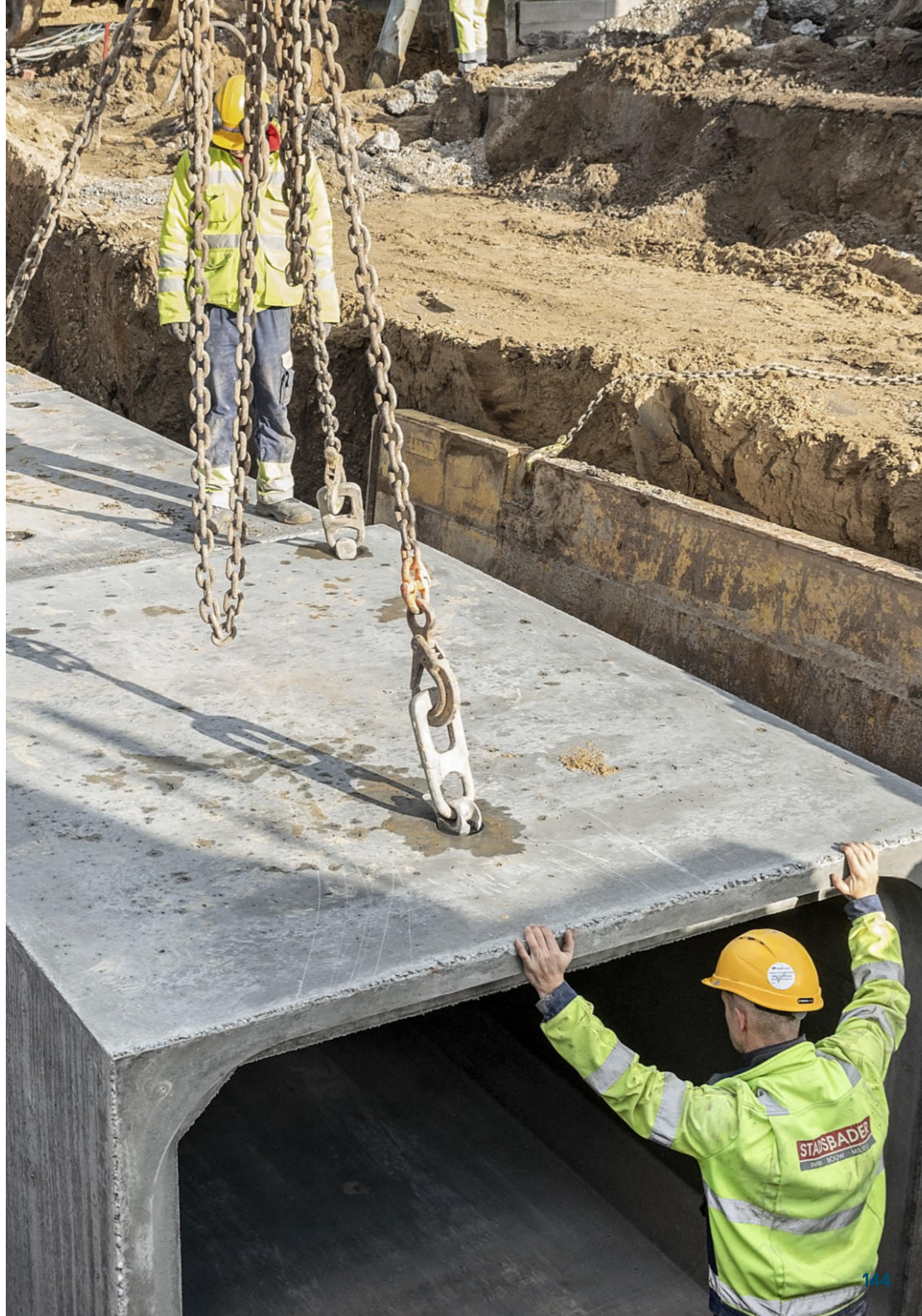
With a total investment budget of 1.69 billion euros over the next ten years, Fluvius is making a significant contribution to the resilience of the wastewater infrastructure in Flanders.

## Alignment with EU Taxonomy

As reported in the chapter [EU Taxonomy](#), 82.3% of the investments of the Fluvius Economic Group are aligned with the criteria. The amount of revenue, CapEx, OpEx for economic activities that are eligible but not yet aligned is very limited. Fluvius is therefore mainly focused on continuing to meet the criteria for alignment and increasing the percentage of aligned activities. This will be a logical consequence of increasing investments in energy transition and climate adaptation.

## Investments [CapEx amounts] in economic activities related to gas

As Fluvius is still active as a gas distribution system operator, investments are made in this economic activity. As mentioned in [Fluvius' ten year Investment plan](#), a "keep it running" strategy is applied, whereby we seek to balance opportunities for sustainable infrastructure redeployment with financial impacts, including the risk of lower gas network utilisation rates and associated costs. We also continue to ensure a reliable and secure supply of energy through the gas network.





## Investment required for decarbonisation plan

Fluvius' decarbonisation plan aims to make Fluvius a carbon neutral company by 2050. This will require investments in both core and supporting activities, as well as in emission flows from the value chain. These investments are closely linked to already planned operating resources and investments and represent an additional rather than a separate cost. Therefore, it is not possible at this stage to determine an overall investment budget for the decarbonisation of Fluvius or to establish a clear link to the figures in the EU Taxonomy. In 2025, we will refine the decarbonisation budgeting and try to make an estimate.

## Integration of the transition plan into the overall business strategy and financial planning

It should be noted that Fluvius plays an important role in the overall energy transition and climate strategy of Flanders. In connection with this, Fluvius' investments in the Flemish energy and wastewater distribution network will therefore increase, with the result that - without the measures of the decarbonisation strategy - Fluvius' overall CO<sub>2</sub> impact in terms of scope 1, 2 and 3 emissions will increase significantly. The development of the transition plan takes this development into account. Consequently, it makes sense to consider relative emissions<sup>1</sup> as well as absolute emissions in the follow-up to the decarbonisation plan. This will be further explored by Fluvius.

## Approval of the transition plan

Fluvius' transition plan was approved by the Management Committee on 12 December 2024.

## Progress of the transition plan

As set out in the [Targets](#) in the transition plan, we are aiming for a 47% reduction in scopes 1 and 2 by 2030 and climate neutrality for scopes 1, 2 and 3 by 2050. In 2024, we have already achieved a 7% reduction for scope 1 and 2. Scope 3 emissions are on the rise as the wave of investment in the energy and climate transition reaches cruising speed.

In the coming years, targeted actions will support further progress in the transition plan, both for scopes 1 and 2 and for Scope 3. The results of these actions will be monitored internally and reported in the CSRD report.

<sup>1</sup> When expressing relative emissions, the absolute number is divided by a denominator that reflects the scale of the emissions. When the scale changes, for example when there is a significant amount of investment resulting in increased absolute emissions, relative emissions remain more stable. As a function of comparability, relative emissions are valuable information.

# Material impacts, risks and opportunities and their interaction with strategy and business model [E1.SBM-3]

## Physical climate risks and climate transition risks

For each material climate risk identified in the double materiality analysis, it is indicated whether it is considered a physical climate risk or a climate transition risk. As shown in the table below, only transition risks were identified, which is in line with Fluvius' core mission to achieve energy and climate transition.

Subtopic	Material risk	Physical climate risk or climate transition risk
Energy	Decline in gas demand and pressure on affordability of tariffs and resources to keep the network running.	Transition risk
Energy	More extreme peaks in energy consumption and associated operational challenges.	Transition risk
Energy	Lack of regulatory framework for heat network management.	Transition risk
Climate mitigation	Risk of stranded assets for gas networks and risk of accelerated depreciation with increased costs for end users.	Transition risk

## Resilience

Climate adaptation is an integral part of Fluvius' business strategy. Through our sewerage activities, we facilitate climate adaptation for all cities and municipalities for which we act as sewerage manager. Our vision note on sewerage explains how we are translating this into a roadmap.

This is how we respond to physical climate risks in our business model. We respond to climate transition risks through strategic commitments and within the Energy and Climate Transition Division. The necessary elements are embedded in Fluvius' policies and processes.

In 2023, a physical climate risk analysis was conducted on all Fluvius assets. This analysis was carried out in accordance with the requirements of the EU Taxonomy and examined the resilience of our assets and the impact of different climate scenario analyses. The main findings are that wind and water risks are the most significant physical climate risks for Fluvius. Flooding, sea level rise and storms are weather events that can have a significant impact. The most vulnerable assets are overhead power lines, substations and transformers, as well as public lighting infrastructure. Offices and control centres are also exposed to these physical climate risks.

Unlike wind and water risks, temperature and solid mass risks are not a major concern for the company. These weather conditions are virtually non-existent in the company's operating area, even in the pre-defined climate scenario analyses.

An overview of the location of assets with high to very high physical climate risk can be found in the [annex](#).

## Description of the processes to identify and assess material climate-related impacts, risks and opportunities [E1.IR0-1]

The process of mapping and analysing climate impacts, risks and opportunities is located in different areas and responsibilities, which are explained below.

The **impact on climate change**, in particular Fluvius' greenhouse gas emissions, is mapped within the Environment Department. They calculate scope 1, 2 and 3 emissions as reported in [E1-6](#). Based on this knowledge and analysis of the results, the decarbonisation plan is developed, implemented and adjusted. More information on the decarbonisation plan can be found in [E1-1](#).

**Physical climate risks** are identified within the Network Management Division. They periodically perform a physical climate risk analysis, taking into account climate scenarios, as reported in [E1.SBM-3](#). This analysis identifies climate risks for the short, medium and long term. This is done for all types of assets belonging to the business activities (grid-bound and non-grid-bound). The assessment is proportional to the scale of the activity and the expected lifetime of the assets. In the case of Fluvius, the expected lifetime of the assets is between 50 and 100 years, so the climate scenario that looks furthest into the future, up to 50 years, is chosen. The extent to which the assets and activities are potentially exposed and vulnerable to the identified climate hazards has been assessed for each asset location, taking into account the probability, magnitude and duration of these hazards. The identification of climate hazards and the assessment of exposure and sensitivity were underpinned by the 'Representative Concentration Pathway 8.5' (RCP8.5) climate scenario. This scenario represents a conservative worst-case scenario and is well known and widely used in scientific research and policy development. Based on these findings and analyses of the results of the physical climate risk analysis, an action plan will be developed and implemented in policy.

**Climate transition risks** are identified within the Energy and Climate Transition Division and Strategy Division. Through research and consultation with stakeholders in the value chain, the risks and opportunities that may arise from climate scenarios and the impact on Fluvius' assets and business activities are analysed.

# Policies related to climate change mitigation and adaptation [E1-2]

## Climate mitigation

Fluvius' climate change policy follows directly from the identified decarbonisation levers and is monitored by the relevant departments and the Management Committee. We apply the elements of this policy to drive the decarbonisation of Fluvius. For core and supporting activities, we aim to be carbon neutral by 2040 (scope 1 & 2), and for the entire value chain by 2050 (Scope 3).

## Mobility

Fluvius' mobility policy is fully committed to sustainable transport. We envisage a gradual phase-out of fossil-fuelled vehicles, with full electrification of leased vehicles and electrification of service vehicles, depending on the availability of solutions. In addition, the range of alternative means of transport is very extensive. Fluvius encourages employees to leave their cars at home as much as possible. Those who travel by bicycle can count on a bicycle allowance or use blue-bikes, service bicycles or bicycle leasing. Employees who commute by public transport, receive a free season ticket and business trips by public transport are fully reimbursed. Those who drive are encouraged to carpool. Employees who carpool more than 20 times a year receive a tax benefit. Managers can opt for a mobility budget as part of their salary package. With the mobility budget, you have the option of ordering a smaller leased car and spending the rest of your budget elsewhere. Or you can choose not to lease a car at all and spend the entire budget in another way, such as leasing or buying a bicycle for yourself or your family members, paying your rent or mortgage loan, travelling by train to a European destination, renting a car for your holidays and much more... Fluvius' teleworking policy also benefits from the mobility of its employees by reducing the number of kilometres travelled.

## Buildings

The design of buildings always takes into account the 'Planet' domain, which includes criteria related to energy performance, renewable energy, energy efficient equipment and appliances, raw material conservation, material selection and passporting, water consumption and reuse, water disposal, biodiversity, environmental impact and site management. In the 'Profit' domain, energy consumption and monitoring are also considered. In terms of mobility, the site's accessibility by public transport, bicycle, foot and car is assessed. This comprehensive set of criteria contributes to the decarbonisation of Fluvius' buildings and, with the choices made, we aim to have carbon-neutral buildings by 2050.

## Energy

For Fluvius, the [energy policy](#) is also a climate mitigation policy. In particular, carbon-free energy for our own consumption and our commitment to energy efficiency are important building blocks for the decarbonisation of core and supporting activities. Through a relative reduction and increase in the carbon-free share of grid losses, we aim to make our energy networks energy neutral.

## Circular material use

As one of the main sources of CO<sub>2</sub> emissions in scope 3 is purchased materials, Fluvius also considers a [circular materials policy](#) as a climate mitigation policy. By focusing on inflow reduction, service life maximisation and material conservation, a CO<sub>2</sub> reduction is achieved at the same time. Integration into the procurement process and asset management will be essential elements.

## Climate adaptation

Fluvius plays a crucial role in Flanders' climate change adaptation. As a sewerage manager, we work within the legal framework and with a clear vision on sewerage to create a future-oriented sewerage network. In cooperation with the 87 cities and municipalities for which we are the sewerage manager, we are implementing the rainwater and drought plans that have been drawn up. In this way, we ensure a more climate-resilient Flanders. For more information, see our [Policies related to water \(E3-1\)](#).

Fluvius is also exposed to the risks of climate change. In 2022-2023, Deloitte carried out a physical climate risk analysis on behalf of Fluvius. Fluvius' activities and assets were screened against the defined and relevant climate risks, based on the guidelines of the EU taxonomy. For each of the risks analysed, the number and type of assets sensitive to the risk were identified, as well as the impact of the failure of the asset. In this way, Fluvius gained insight into which climate risks pose a significant problem for which assets and activities. This enables a targeted approach.

Taking into account the impact and vulnerability of Fluvius assets to the climate risks studied, two significant climate risks were identified. First, fluvial and pluvial flooding pose a significant risk to building assets (such as cabins, offices, control centres and warehouses). Secondly, wind risks have a potentially very negative impact on above-ground assets, particularly overhead power lines and public lighting poles.

As these risks have a significant impact on some of Fluvius' operations and assets, they will be considered in the preparation of an adaptation plan to mitigate the impact of climate risks.

Climate risks related to temperature and soil were also considered, but were not identified as having a significant impact on Fluvius' operations and assets. They will therefore not be considered further in the adaptation plan for the time being.

Fluvius will use the information from the report to take appropriate measures to protect its assets and ensure business continuity in the face of climate-related challenges.

To effectively address the identified climate risks, adaptation solutions will be selected and developed according to the criteria of the EU Taxonomy. These physical and non-physical solutions will be implemented within 5 years for all existing activities and all new activities using existing assets. A key criterion is the use of nature-based solutions, which harness the power of nature to address complex environmental problems, including climate change and biodiversity loss. Because nature-based solutions or solutions using blue or green infrastructure can take many forms, because the approach to existing assets may differ from that for new assets, and because both physical and non-physical adaptations are considered, the implementation plan proposed by Fluvius includes a wide range of solution options. When developing and implementing solutions, we take care to ensure that they are consistent with the actions of other parties and do not cause additional damage to other parties (people, nature, cultural heritage, assets and economic activities) in the area.

## Energy

### Energy transition

The energy transition will accelerate in the coming years. Fluvius wants to contribute to making it feasible, affordable for all and in line with Flemish and European climate objectives. In our [Investment plan](#), we describe the investments in the Flemish electricity and gas distribution networks and the conditions for the growth of alternative solutions, such as the capacity tariff and flexibility services. In doing so, we take the social context and the policy framework as our starting point. We base our network investments on a number of long-term assumptions, based on the ambitions of the [Flemish Energy and Climate Plan](#):

- full electrification of passenger transport;
- the use of residual heat in heat networks;
- an increasing trend towards the electrification of freight transport;
- the electrification of heating in new buildings and thorough renovation of buildings;
- an accelerated growth in solar and wind energy;
- increasing electricity consumption and peak loads in industry.

With the assumptions mentioned above, many scenarios are still conceivable in terms of the extent and speed of electrification. The electrification of mobility is the main factor behind the increase in peak demand on electricity distribution networks. The simultaneous charging of electric cars on the distribution grid is a major challenge for the grid operator. In a second phase, the electrification of heating through heat pumps will also have a significant impact on the distribution network. The future is uncertain. We do not know which scenario will come to pass. However, we can identify the necessary additional "no regret" investments for a wide range of scenarios:

- that need to be implemented at a sufficiently fast pace (before 2033) to avoid getting into trouble;
- which are certainly not superfluous in view of the electrification we expect by 2050, even if we can limit the impact of electrification on the network's peak load and on investment needs with all kinds of mitigating measures (capacity tariff, flexibility);
- that take account of spatial planning: the future development of public space will help to ensure that networks are correctly dimensioned technically speaking;
- that seek the maximum responsible synergy with other works in the public domain.

Because of its social role, Fluvius wants to keep future investment costs (and the impact on future network tariffs) at an acceptable level. Through the introduction of digital meters, capacity tariffs and cost-reflective tariffs, network costs can be distributed in such a way that customers pay 'their share' of the costs through tariffs. Tariff incentives can play an important role in keeping future network investments manageable.

Electrification will also reduce demand for gas. Our customers will eventually switch to alternatives that are compatible with a climate-neutral Flanders. For this to happen, the necessary conditions must be in place, such as a higher renovation rate and additional network investments for heat or electrification. Customers will continue to be connected to the existing gas network, partly as a result of phasing out heating oil. In the short term, the impact of additional gas connections will remain limited and not significant enough to justify additional investments. In the longer term, we expect [peak] gas consumption to decline. We therefore apply a 'keep it running' scenario for the gas distribution network. Of course, our existing gas customers can continue to rely on the gas distribution network.

Today, there is no policy framework for phasing out existing gas networks. Under the current legal framework, access to the gas network cannot be denied, with the exception of new major projects and new construction in the future. Therefore, there is no basis today to allocate funds in the Investment plan for phasing out the existing gas network, nor for accelerated depreciation

of assets. At Fluvius, we have already anticipated the forthcoming legislation by amending our project regulations. Since 1 January 2023, we no longer install a gas network in new allotments.

A decline in [peak] gas consumption in the long term could put pressure on the affordability of gas tariffs and the resources needed to maintain the gas network. The main focus of the 'keep it running' investments is therefore on the maintenance and replacement of existing assets to ensure safety and maintain operational efficiency. Only [very limited] investments in network expansion are usually made in response to specific customer requests.

Our customers will eventually switch to alternatives that are compatible with a climate-neutral Flanders. For this to happen, the necessary conditions must be in place, such as a higher renovation rate and additional network investments for heat or electrification. Customers will still be connected to the existing gas grid, partly due to the phase-out of heating oil. In the heating scenarios, we assume that 8% of the current housing stock will be connected to high temperature heat networks by 2050. Homes connected to low-temperature heat networks will also use heat pumps and are included in the network impact calculation. Fluvius gives the highest priority to the sustainable use of waste heat for heating buildings. As heat is not a regulated activity, Fluvius' activities and investments are not part of the Investment plan. Only where it is relevant for gas and electricity network investments, we make the link to heat networks by subtracting the potential from the need for electrification.

## Renewable energy

### Reception capacity and trading of renewable energy on our electricity grids

As stated in our [2050 vision for networks](#), Fluvius aims to maximise the availability of renewable energy on our networks. We are increasing our customers' absorption capacity for local generation and restructuring our grids to maximise the absorption of this renewable energy. We are also ensuring that customers can participate in renewable energy trading (energy sales, energy sharing, energy communities). Based on the data generated by the digital meter and our role as data manager, Fluvius and Atrias are a crucial link in this process. You can find out more about energy sharing on [our website](#).

In our [Investment plan](#), we assume that the supply of decentralised renewable energy sources will increase. We see continued investment in renewables such as solar panels, wind turbines and small combined heat & power plants. The cost of investment in these technologies continues to fall, thus accelerating their growth.

### Green molecules

It is not only in electricity grids that we want to maximise the uptake of renewable energy; green molecules can also be injected into our gas grids. Fossil natural gas is unlikely to be phased out without a fully carbon-neutral replacement. The potential long-term role of gas networks depends on the availability of green molecules and the development of specific applications. The availability, role and price of green molecules, and thus the possible future role of existing gas distribution networks, cannot be predicted with any certainty today. We should therefore avoid premature decisions on the long-term vision on gas networks. By keeping open the option of future reuse of (parts of) the natural gas distribution network, we are also safeguarding the possibilities for green gases or blends and are not mortgaging these possible technological developments. Fluvius intends to actively participate in pilot projects for biomethane, power-to-gas and green hydrogen. We will of course continue to monitor market, technology and regulatory developments. In subsequent iterations, we will adjust our starting points as needed based on the latest information.

For the phase-out of fossil fuels by 2050, especially natural gas and heating oil for heating buildings, Fluvius proposes two options: connection to a heat network or electrification by means of heat pumps. Heat networks can help relieve the pressure on the electricity grid by (partially) avoiding the additional electricity demand of the alternative. The availability of adequate heat production is a *conditio sine qua non* for the construction of a sustainable heat network, both in terms of security of supply and sustainability. The term 'sustainable heat' can include both 'green heat' (from renewable sources such as heat pumps and geothermal energy) and 'waste heat' (from industrial applications not necessarily powered by renewable sources).

### Legal framework for the production of renewable energy

The [Energy Decree](#), to which Fluvius is subject, stipulates that a distribution system operator, its operating company and their subsidiaries with legal personality may not engage in energy production activities, except to cover their own energy consumption. Furthermore, they may not participate in a legal entity engaged in energy production. The above prohibition does not apply to production to cover the legal entity's own energy consumption. With regard to the activities of heat suppliers, an exemption is provided for the production of thermal energy, provided that this activity is temporary.

### Solar panel production for own consumption

As explained in the legal framework for renewable energy production, Fluvius is only allowed to produce energy for its own use. This is done by generating electricity through solar panels on Fluvius' buildings. The Fluvius solar panel park currently has a capacity of 1400 kWp. In addition, the Flemish government has introduced a PV obligation, which means that by 30 June 2025, solar panels will be mandatory on buildings of public organisations such as Fluvius that consume more than 250 MWh of electricity per year. From 2030, the obligation for public organisations will be extended to buildings that are connected to an EAN supply point and have a consumption of more than 100 MWh per year from 2026. This obligation will increase the total capacity of renewable energy production from solar panels within Fluvius in the near future.

Production from solar panels will not yet cover all the energy consumed by our buildings. As part of the goal to make buildings energy neutral by 2050, possible further steps will be identified to meet this remaining consumption with renewable energy. Current standards for new buildings already require high levels of energy efficiency and will therefore always use renewable energy production to meet energy needs.

Fluvius' network losses represent a large proportion of its energy consumption. From 2030, an increase in the decarbonisation of grid losses will be initiated with the aim of achieving 100% decarbonisation by 2050. In 2025, a multidisciplinary working group will initiate a study process to cost-effectively achieve carbon-neutral energy procurement for grid losses. The results will take into account applicable regulations and will be subject to consultation with all stakeholders.

## Energy efficiency

In the electricity and gas reporting models, the regulator asks for information to assess the energy efficiency potential of the electricity and gas infrastructure. When trying to find the optimal way to operate a distribution network without sacrificing quality, it is often necessary to balance different aspects that fall under the heading of 'efficiency'. On the one hand, a network operator wants to control the energy consumption associated with network operation (especially network losses). On the other hand, efficiency also means making efficient use of the available infrastructure, thereby controlling the need for new investments in grid reinforcement. These two objectives are not always achieved by the same measures. It is often necessary to evaluate which approach makes the most sense.

As part of the European Fit-for-55 package, the energy efficiency directive is also being revised. As part of this, the 'energy efficiency first' principle is being proposed. The 'energy efficiency first' principle means that cost-effective energy efficiency measures will be taken into account as much as possible when formulating energy policies and making relevant investment decisions. This reflects the increased focus on energy efficiency that is also expected of network operators.

The digital energy meter is a real lever for large-scale energy savings. For example, it will provide a better insight into personal energy consumption and raise consumer awareness. The data collected on the behaviour of network users will also enable Fluvius to better monitor consumption & injection and thus make more targeted investment decisions that take energy efficiency into account. Fluvius is therefore doing everything it can to accelerate the introduction of the digital meter.

For Fluvius, digitisation and automation are not an end in themselves, but a necessary step to make better and faster decisions about the management of our distribution network.

In addition to increasing the energy efficiency of the electricity networks, Fluvius is also committed to the complete and intelligent conversion of public lighting to LED. We want to help local governments make their public lighting more energy efficient, flexible and sustainable. The level of LED conversion rate is now 60.87%. The aim is to achieve full LED conversion by 2028.



# Actions and resources in relation to climate change policies [E1-3]

## Climate mitigation measures

For each of the [Decarbonisation levers](#) defined in the Transition plan, the measures needed to achieve the reduction targets are planned. For scopes 1 and 2, these measures are already well-defined and the expected reductions can be estimated. The decarbonisation of the value chain (scope 3) will largely be achieved through partnerships with suppliers, contractors and service providers. The measures will be integrated into the procurement documents. The expected reductions are still under investigation.

As explained in the [Investment required for decarbonisation plan](#), the measures involve additional costs that are closely related to existing operating resources. For this reason, it is currently not possible to determine a total investment budget for the decarbonisation of Fluvius or to establish a clear link to the figures in the EU Taxonomy. In 2025, we will refine the decarbonisation budgeting and try to make an estimate.

Decarbonisation-lever	Key actions	Emissions	Emissions	Reduction	Emissions	Reduction	Emissions	Reduction
		base year			2040		2050	
		2020	2030	2030	2040	2040	2050	2050
Sustainable transport	Phasing out fossil fuels through electrification or alternative fuels and transport methods, carbon free EV consumption	11,480	9,661	16%	7,857	32%	0	100%
Housing & energy	Phasing out fossil fuels for heating, energy efficiency, zero-energy buildings	4,833	1,732	64%	0	100%	0	100%
Distribution network electricity	Disconnecting consumption of public lighting installations, energy efficiency, carbon free grid losses	237,117	101,253	57%	37,645	84%	0	100%
Distribution network gas	See methane emissions reduction plan	76,345	62,046	19%	39,966	48%	20771	73%
Heating	Phasing out fossil heat sources	2,765	2,534	8%	1,267	54%	0	100%
Sewerage	Research optimisations of relative emission reduction per connected resident	124	158	-28%	174	-41%	192	-55%
SF6	Phasing out use of SF6 according to legal requirements	254	477	-87%	411	-61%	352	-38%
Compensation	Research strategy offsets, possibly through carbon credits or carbon capture & storage projects	0	0	-	-87,320	-	-21315	-
<b>Total</b>		<b>332,918</b>	<b>177,862</b>	<b>47%</b>	<b>0</b>	<b>100%</b>	<b>0</b>	<b>100%</b>

## Climate adaptation measures

The Fluvius adaptation action plan, which focuses on reducing the impact and risk of pluvial and fluvial flooding (identified as key risks), has four main themes. First, we will examine the known and/or study identified risk assets and develop individual or collective (physical and non-physical) adaptation measures. We will also consult with other parties in the public domain. Additionally, we want to make a positive contribution to reducing the impact of flooding. We can do this through our role as a sewerage network manager, but also as an important public partner for the other assets we manage (implementation of nature-based solutions or blue/green infrastructure). Besides, we will incorporate climate risk analysis into Fluvius' risk-based asset management. Finally, based on the knowledge gained from the previous points, we will develop adapted design rules when new assets are located in a climate risk zone or when new activities are undertaken.

With these measures, Fluvius aims to increase its resilience to climate change and to actively and passively protect its assets against future climate-related challenges. The climate adaptation plan will be further developed in 2025.

## Energy-related measures

The energy measures fit into the measures mentioned in Fluvius' [Investment Plan 2024-2033](#).

### Increasing energy efficiency

#### In distribution cables

The lower the resistance of the cable, the lower the network losses. However, thicker cables require more investment. When Fluvius replaces an existing high-voltage cable or extends the high-voltage distribution network, it chooses a larger cross-section than is strictly necessary in around 30% of cases. We do this in order to reduce network losses. This results in higher investment costs in the year of construction, but we recuperate these higher costs in the longer term. Fluvius has a clear policy that sets out the principles for selecting the route of new lines. Our tool takes into account three aspects: grid losses, voltage drop and the cable's load capacity.

#### Eliminating imbalance

When energy flows in networks are not evenly distributed between the different phases, this is known as phase imbalance. This phenomenon occurs mainly on our low-voltage distribution networks and less so on our high-voltage distribution networks. Phase imbalance is therefore mainly caused by an unbalanced distribution of single-phase connected customers on a low-voltage cable, or by three-phase connected customers who do not have an even load distribution on their indoor installation. That imbalance can occur with consumption or injection of decentralised low-voltage generation installations (mostly solar panels). This imbalance leads to greater energy losses in our low-voltage distribution network, causing the cable load to reach its maximum more quickly, which may or may not result in voltage problems. As a precaution, we try to spread single-phase customers when new connections are made. On the other hand, for three-phase customers, we educate installers to spread the load evenly between the phases or to use three-phase inverters.

#### Application of higher mains voltage

A higher operating voltage leads to lower currents for the same power, which means lower grid losses.

### 400 V grid for all grid users

A higher operational voltage 400 V of the low-voltage distribution network contributes to energy efficiency, thanks to lower grid losses.

### Application of 30 kV or 36 kV

When new customers are connected, both for injection and consumption, a careful choice is made between the different voltage levels. When connecting production to the high-voltage distribution network, we try to connect this production as close as possible to the consumption. In this way, we limit power flows and the associated grid losses. If it is possible to connect production to a 30 kV or 36 kV grid, we work out the optimal choice depending on the connection capacity.

### Leaving lower high-voltage levels

In the Port of Antwerp, 11.3 km of high-voltage distribution network is still operated at 6 kV. We have a rehabilitation policy to ensure that this voltage level is abandoned within the foreseeable future.

### Targeted choice open point in distribution loops

Careful placement of the open point limits energy loss, prevents voltage problems and reduces repair time in the event of a failure. In addition, the cable is subjected to less stress and is therefore less susceptible to aging. As a result, less cable investment is required. The introduction of the digital high-voltage cabin will increase the number of measuring points in the high-voltage distribution network. This leads to a better understanding of the load and therefore a better assessment of the location of the optimal open point. On the other hand, the degree of teleoperation (ability to switch remotely) increases. Dynamic shifting of the high-voltage distribution network thus allows the open point to be moved under varying load conditions, taking into account energy losses, voltage drops, etc.

### Energy-efficient transformers in distribution cabinets

Energy-efficient distribution transformers have lower losses. However, they are more expensive. When purchasing distribution transformers for new electricity cabins or to replace existing transformers, Fluvius chooses an energy-efficient transformer. The transformer must comply with [Commission Regulation \(EU\) No. 548/2014](#) (ecological design of transformers). In addition, Fluvius gives suppliers an extra incentive by awarding the tender on the basis of 'Total Cost of Ownership' (TCO). This allows us to procure the most stringent loss levels possible, taking into account the best available technology. The tender will be conducted jointly for Fluvius-Ores-Sibelga. The

specification is also used by RESA. Transformers are not replaced proactively due to lower loss levels. The costs are too high compared to the losses avoided.

### Segregated operation in transformer substations

Fluvius has opted for a transition from solo to separate operation of transformer stations. This is a way of increasing the reception capacity for decentralised production. In solo operation, the power of one transformer determines the receiving capacity. In separate operation, the sum of the transformer powers determines the receiving capacity. This substantially increases the capacity. However, increasing the total transformer power means that the load on the individual transformer decreases. This also means that the load losses decrease, as they are proportional to the square of the current. In contrast, iron losses increase with each transformer in service, regardless of load. Switching to separate operation is therefore advantageous when decreasing load losses compensate for increasing iron losses. This is the case for transformer stations with particularly high loads. The trend within Fluvius to switch to separate operation therefore not only increases the receiving capacity, but also reduces energy losses.

### Optimally connecting decentralised production

Historically, electricity grids have been built in a tree structure. This grid structure was not designed to efficiently integrate a significant capacity of distributed (renewable) energy generation and the market forces associated with it. Energy efficiency can be improved by reducing grid losses and ensuring that injected energy is consumed locally as much as possible, immediately and preferably at the same voltage level. Fluvius aims to integrate all distributed (renewable) energy projects, large and small, into the distribution grid at the lowest possible social cost.

### Digital meter possibilities

First and foremost, the digital meter provides greater insight into personal energy consumption. It creates awareness among individual grid users, which contributes to the energy efficiency of the electricity system. The individual behaviour of each grid user can be better taken into account thanks to the digital meter. This makes it possible to better monitor consumption and injection and to make more targeted investment decisions. This allows us to make better use of assets (cables, transformers, etc.). We always take energy efficiency into account when choosing the final solution.

## Better use of distribution networks

The starting point for an improved utilisation of the distribution network is a better understanding of the actual load. The digitisation of electricity networks is an important contributing factor. The new and additional data support any alternative measure to better utilise the capacity of the distribution network, in addition to the standard investments in capacity increase/network reinforcement. These measures can be divided into the following categories:

- **Dynamic network management:** ensures better utilisation of the existing physical infrastructure. By dynamically managing networks and reconfiguring them according to load, (temporary) spare capacity becomes visible, usable or better utilised.
- **Tariffs:** a more cost-reflective tariff, such as a capacity tariff, encourages end-users to diversify their consumption or to match it more closely to their own production and thus to self-consumption.
- **Market-based flexibility and/or supporting services:** sometimes the network operator cannot actively correct undesirable network situations with its own assets and passive incentives for customers are not sufficient. In those cases, it is useful to have customers actively contribute at times when grid capacity is insufficient. The decision to participate is free and lies with the network user.
- **Technical flexibility:** participation is mandatory and driven by the network operator. We consider technical flexibility only when the use of market flexibility proves not to be an option, for example in emergency situations, or when the purchase of market-based flexibility is not economically efficient.
- **Local automatisms:** to deal with very local phenomena, it is useful to have local automatisms built into grid-bound applications. This prevents different customers from being affected by local phenomena. It also allows reactive measures to be taken in order to avoid local problems in the future. This can be done through other mitigation measures or grid reinforcements.

Fluvius' vision on flexibility can be seen in the [Investment plan](#).

## Renewable energy

As explained in the [Legal framework for the production of renewable energy](#), Fluvius is only allowed to produce energy for its own consumption. As a grid operator, we do receive a maximum of renewable energy on our grids.

## PV installations

The amount of solar energy injected into our electricity grids is steadily growing and continues to do so. In addition to an increase in residential installations, we are also seeing larger corporate projects. We expect this trend to continue, boosting installed PV capacity. There is still a lot of potential towards 2050, up to 65 GWp of solar panels on rooftops in Flanders, according to a recent [study by EnergyVille/VITO \(EnergyVille/VITO, 2021\)](#). There could also be additional solar panels on car parks (e.g. carports) or in the form of floating solar panels or PV on the ground.

## Onshore wind turbines

Fluvius is collaborating with various authorities and stakeholders - in particular wind project developers - to map the wind potential of a region and cluster areas. In this way, appropriate scenarios can be studied in time and adequate investments prepared, including coordination with the transmission system operator Elia (on the necessary investments in the transmission grid).

## Combined heat & power (CHP) plants

Combined heat & power (CHP) is the simultaneous production of heat and electricity using a fuel-fired engine. This can be a fossil fuel (heating oil or natural gas) or a renewable fuel (biogas or biomass). We note that distributed CHP capacity continues to grow. However, certificate support for all new and substantially modified fossil CHPs will be fully phased out from 2023 instead of 2030. We expect the number of new CHP applications to decline. In the longer term, this will lead to less local supply of electricity and a reduction in gas consumption.

## PV obligation for own consumption

The Fluvius solar farm generates renewable energy for Fluvius buildings. The introduction of the PV obligation will be a catalyst for increasing the installed capacity. Some of this additional capacity is already planned, and at other sites we are looking at how to achieve the required capacity while meeting all the requirements and taking into account the future development of the Fluvius estate. For example, some buildings will be decommissioned in the near future and new buildings will be fitted with PV as standard.

## Strategic research and living labs

Fluvius wants to monitor innovations in grid management, data requirements, market forces, the flexibility market, grid users and energy sources. By participating in research projects, we want to investigate the feasibility on a large scale, as well as test and help shape the industrialisation of these developments.

### Living Lab Mechelen

We are building a 'living lab' on our site in Mechelen. It should answer the following questions:

- How can we design the public space to expand common spaces in a flexible way to improve the comfort and quality of the life of citizens?
- How can the Fluvius Living Lab become an incubator for the energy transition in Flanders?
- What trends and developments should we take into account?
- What makes the lab 'future-proof' (changing standards and legislation)?
- How should the site be set up conceptually to make the energy transition flexible in practice (in terms of technology, collaboration and efficiency)?
- How do we ensure that working together in the Fluvius Living Lab is practical and cost-effective?
- What are the assets that make the Fluvius Living Lab attractive to external parties?
- How should we organise the Fluvius Living Lab to respond to opportunities?

### Green Energy Park Zellik

As a strategic testing ground in the Zellik Research Park, Green Energy Park stimulates collaboration between companies, knowledge institutions, governments and end users. It does this by providing them with unique testing grounds or living labs where they can test and refine their innovative developments in a realistic environment. The development of these testing grounds will focus on four research areas: 'Energy & Mobility', 'Smart regions', 'Hospital of the future' and 'Biotech'. Digitisation, circularity, sustainability and CO<sub>2</sub>-neutrality are the guiding elements. By encouraging and supporting collaboration, the Green Energy Park aims to enable the development of innovative solutions for a healthy and sustainable community. The vision of the Green Energy Park is to 'collaborate today on tomorrow's solutions by bridging the gap between research and implementation as a co-creation hub and strategic experimental testing ground'.

## ADriaN

Together with EnergyVille, we are running the ADriaN research project. ADriaN examines developments in the low-voltage distribution network that could become a major challenge. ADriaN calculates the impact of these developments on the Flemish low-voltage distribution network and examines which solutions are feasible and which are not. This is translated into concrete technical solutions and 'flanking measures' that make maximum use of the available capacity. The aim is to go beyond existing studies, which are limited to potential high-level impacts and often depend heavily on unrealistic assumptions. Often the studies are too complex to be implemented in practice. Challenges include ensuring that proposed solutions are sufficiently scalable and compatible with existing initiatives and approaches within the organisation, as well as translating the study results into a Fluvius position that takes maximum account of policy and external stakeholders.

### Other research projects

Furthermore, we collaborate with various partners to test the feasibility and applicability of projects on a larger scale. To this end, we are involved in several research projects:

- Hydrogen applications in the construction sector (Terranova project);
- Development of shore power in the Flemish seaports and for inland navigation;
- The applicability of direct current networks at the Zwevegem transformer site;
- Leuven Climate Neutral, where we are in charge of the energy section;
- Several transition projects in Antwerp, Mechelen, ...;
- Collaboration on Regionale Ruimtelijke Energiestrategieën (RRES, or Regional Spatial Energy Strategies) for the provinces;
- Analysis and design of heat zoning and its impact on electricity grids;
- Proof of concept as an extension of the existing Flex Data Hub for the participation of distribution network users in Elia's frequency-related support service Frequency Containment Reserves.

For this package of research and development projects, we also include the necessary budgets in the [Investment plan](#).

# Targets related to climate change mitigation and adaptation (E1-4)

## Climate mitigation

As explained in [Targets](#) in the Transition Plan, Fluvius' ambition is to be climate neutral for all activities and the entire value chain by 2050 at the latest.

We segment this ambition according to our (in)direct impact:

- for the core and supporting activities, we accelerate our target towards climate neutrality in 2040 (scope 1 & 2)
- for the entire value chain, we maintain 2050 as our target (scope 3)

These targets are consistent with limiting global warming to 1.5°C, as the goal is to be climate neutral by 2050. A multidisciplinary team was set up to define the targets and the decarbonisation plan. They used the CO<sub>2</sub> emission streams calculated according to the GHG Protocol and the expected reductions that can be achieved through the [Decarbonisation levers](#) and [Climate mitigation measures](#). This is in line with legal obligations to phase out emissions and with best practices in decarbonisation measures within the sector. The results have been validated by the Management Committee.

The calculated total emissions figures are reviewed by the company's auditor as part of the 'limited assurance' review of this CSRD report. The targets have not yet been externally verified. Fluvius will submit the transition plan to the Carbon Disclosure Project (CDP) in 2025.

## Climate adaptation

The climate adaptation objectives in Flanders are in line with the defined [Targets sewerage](#). No specific targets have yet been set for managing the physical climate risks of Fluvius' assets. When we set targets, the necessary stakeholders will be involved.

## Energy

The energy targets are in line with the ambitions of the [Investment Plan](#). To arrive at these targets, the necessary stakeholder consultations were organised. We asked industry associations, academia and policy makers for their assessments and recommendations. We also consulted closely with Elia on the assumptions underlying the Investment Plan.

Scope	Value	Compensation	Base year	2024	2030	2040	2050
Scope 1 & 2 <sup>1</sup>	Tonnes of CO <sub>2</sub> -eq emissions	100% from 2040	332,918	309,259	177,862	87,320	21,315
	Reduction			7%	47%	74%	94%
Scope 3	Tonnes of CO <sub>2</sub> -eq emissions	TBD	991,917	1,082,400	-	-	49,596
	Reduction			-9.1%	-	-	-

<sup>1</sup> For scope 2 the market-based emissions were accounted. In E1-6 both the market- and location-based emissions are reported.

## Energy consumption and mix (E1-5)

To provide an insight into Fluvius' overall energy consumption and potential improvements in energy efficiency, the exposure to coal, oil and gas activities and the share of renewable energy in the overall energy mix, the following information is shared.

Energy consumption & mix	2024
Fuel consumption from coal and coal products (MWh)	-
Fuel consumption from crude oil and petroleum products (MWh)	44,657
Fuel consumption from natural gas (MWh)	46,331
Fuel consumption from other fossil sources (MWh)	-
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	202,820
<b>Total fossil energy consumption (MWh)</b>	<b>293,808</b>
Share of fossil sources in total energy consumption (%)	23%
<b>Consumption from nuclear sources (MWh)</b>	<b>486,307</b>
Share of consumption from nuclear sources in total energy consumption (%)	38.6%
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	392,541
The consumption of self-generated non-fuel renewable energy (MWh)	1,038
<b>Total renewable energy consumption (MWh)</b>	<b>393,579</b>
Share of renewable sources in total energy consumption (%)	31%
<b>Verbruik uit andere bronnen (MWh)<sup>1</sup></b>	<b>85,277</b>
Aandeel verbruik uit andere bronnen (%)	6.8%
<b>Total energy consumption (MWh)</b>	<b>1,258,971</b>

<sup>1</sup> Zoals vermeld in de elektriciteitsmix van 2024 van Elia

Energy production	MWh
Renewable	1,038
Non-renewable	0

The various energy flows within Fluvius and De Stroomlijn were mapped. The identified energy flows mainly consist of electricity, natural gas and fuel consumption in (non-)grid-bound buildings, vehicles, grid components and grid losses. The origin of these energy sources is divided into renewable energy (purchased and own production), nuclear energy and fossil energy.

In addition, an insight is given into the energy intensity (total energy consumption per net revenue, cf. [note 2.7](#) of the financial statements). All NACE codes applicable to Fluvius activities are considered to belong to a 'high climate impact sector'.

Information	2024
Net revenue from activities in high climate impact sectors	€ 2,718,535,000
Net revenue (other)	€ -
Total net revenue (Financial statements)	€ 2,718,535,000
Total energy consumption per net revenue (intensity) (MWh/mill €)	463

## Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]

	Retrospective		Milestones and target years					Annual % target / Base year
	Base year	Comparative information [2023]	2024 [N]	%N/[N-1]	2030	2040	2050	
<b>Scope 1 GHG emissions</b>								
Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)	94,347	94,783	94,974	100.20%	76,131	49,095	21,315	-2.6%
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	0	0	0					
<b>Scope 2 GHG emissions</b>								
Gross location-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	240,465	212,886	217,048	101.95%	139,311	155,858	0	-3.3%
Gross market-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	238,571	210,271	214,286	101.91%	101,731	38,225	0	-3.3%
<b>Significant scope 3 GHG emissions</b>								
Total Gross indirect (Scope 3) GHG emissions (tCO <sub>2</sub> eq)	991,917	991,917	1,082,400	109.12%	-	-	49,596	-3.2%
1. Purchased goods and services	408,699	408,699	467,264	114.33%	-	-	-	-
2. Capital goods	250,228	250,228	297,691	118.97%	-	-	-	-
3. Fuel and energy-related activities (not included in Scope 1 or Scope 2)	92,068	92,068	82,153	89.23%	-	-	-	-
4. Upstream transportation and distribution	537	537	412	76.72%	-	-	-	-
5. Waste generated in operations	23	23	27	115.77%	-	-	-	-
6. Business traveling	1,173	1,173	1,320	112.50%	-	-	-	-
7. Employee commuting	11,852	11,852	11,893	100.34%	-	-	-	-
8. Upstream leased assets	0	0	0	-	-	-	-	-
9. Downstream transportation	0	0	0	-	-	-	-	-



Environmental information (E)

	Retrospective				Milestones and target years			Annual % target / Base year
	Base year	Comparative information [2023]	2024 [N]	%N/[N-1]	2030	2040	2050	
10. Processing of sold products	0	0	0	-	-	-	-	-
11. Use of sold products	227,090	227,090	221,319	97.46%	-	-	-	-
12. End-of-life treatment of sold products	0	0	0	-	-	-	-	-
13. Downstream leased assets	63	63	142	227.38%	-	-	-	-
14. Franchises	0	0	0	-	-	-	-	-
15. Investments	185	185	178	96.38%	-	-	-	-
<b>Total GHG emissions</b>								
Total GHG emissions (location-based) (tCO <sub>2</sub> eq)	1,326,730	1,299,587	1,394,421	107.30%	0	0	70,911	-3.2%
Total GHG emissions (market-based) (tCO <sub>2</sub> eq)	1,324,836	1,296,971	1,391,659	107.30%	0	0	70,911	-3.2%

The base year is 2020 for scope 1 and 2, and 2023 for scope 3.

The intensity of total greenhouse gas emissions per net revenue (cf. note 2.7 of the annual report) is 0.0005129 tonnes CO<sub>2</sub>eq/€ (location-based) or 0.0005119 tonnes CO<sub>2</sub>eq/€ (market-based).

Biogenic emissions from biomass combustion or biodegradation not included in scope 2 are 0 tonnes CO<sub>2</sub>eq. Biogenic emissions from biomass combustion or biodegradation that occur in the value chain but are not included in scope 3 amount to 29.11 tonnes of CO<sub>2</sub>eq.

## Explanation of the calculations

### Emission streams

Fluvius' scope 1, 2, 3 emissions have been calculated using the Greenhouse Gas Protocol guidelines in combination with the scope definition as defined in the ESRS guidelines. This takes into account the IFRS classification of the entity and whether or not financial or operational control is exercised by Fluvius System Operator. Taking these factors into account, all scope 1, 2 and 3 emission streams of Fluvius System Operator and De Stroomlijn have been mapped. The scope 1 and 2 emissions of Atrias, Synductis and Wyre are included as emissions in scope 3.

For scope 1, the following emission streams have been identified:

- Natural gas for heating
- Methane emissions in the gas network
- Fuel consumption of service vehicles
- Fuel consumption of leased vehicles
- Losses due to circuit breakers (SF<sub>6</sub>)
- Sewerage activities
- Refrigerant gas emissions
- Fuel consumption of gensets

For scope 2, the following emission streams have been identified:

- Electricity consumption of offices, premises, electric vehicle charging, technical installations for sewerage and heat
- Network power losses
- Steam

Emissions related to the use of electricity through procurement are calculated using the location-based (LB) and market-based (MB) methods. The location-based method calculates scope 2 emissions using the Belgian electricity mix. The market-based method is based on the type of energy (renewable or non-renewable) purchased by Fluvius, with renewable energy having an emission factor of 0. For its own consumption, Fluvius purchases renewable energy equivalent to 1.27% of its scope 2 emissions. For other energy contracts, the general energy mix was accounted.

For scope 3, the following emission streams have been identified:

- Category 1 (Purchased goods and services)
- Category 2 (Capital goods)
- Category 3 (Fuel and energy related activities):
  - Energy purchased for own use (kWh);
  - Energy purchased and resold to end users as part of Fluvius' social role, role as supplier of last resort and emergency supply role (kWh);
  - Heat purchased from industrial companies for resale;
  - Heat produced by Fluvius itself and sold to the end consumer, coming from central gas boilers (back-up heat).
- Category 4 (Upstream transport and distribution): Transport of goods by third parties to warehouses and distribution centres.
- Category 5 (Operational waste)
- Category 6 (Business travel)
- Category 7 (Commuting)
- Category 11 (Use of products sold): Combustion of gas by customers (social role, role as supplier of last resort, emergency supplier).
- Category 13 (Downstream Leased Assets): Leasing of buildings
- Category 15 (Investments): Scope 1 and 2 emissions at Atrias, Synductis and Wyre in proportion to Fluvius' shareholding in these associated companies.

The following scope 3 emission categories are reported as zero:

- Category 8 (Upstream Leased Assets): The 'Upstream Leased Assets' includes the lease of Wyre's cable network. Emissions from the energy consumption of the cable network are already included in Category 15, as Category 15 includes Wyre's scope 1 and scope 2 (33%).
- Category 9 (Downstream transmission and distribution): There is no 'Downstream transport and distribution' as the network is owned by the Fluvius Economic Group and remains so at all times.
- Category 10 (Processing of goods sold): There is no 'Processing of sold goods' as Fluvius does not sell intermediate products.
- Category 12 (End-of-life treatment of products sold): There is no 'End of life treatment of products sold' as Fluvius does not sell any products. Sales of gas and electricity in the role of social supplier, supplier of last resort and emergency supplier are not relevant to this category.
- Category 14 (Franchises): Fluvius does not hold any franchises.

## Data quality

For activity data, Fluvius only uses primary data. Primary data are direct data from the value chain and they are collected directly from activities within the organisation or from suppliers. For the scope 1 methane emission stream, at the time of reporting no full OGMP 2.0 calculations could be made for the 2024 financial year, and methane emissions for 2023 are assumed to be the best approximation of the 2024 results.

Secondary data are used for the emission factors when primary data are not available<sup>1</sup>. Secondary data come from e.g. databases, literature, industry averages, ... The secondary emission factors used come from the International Energy Agency (IEA), the 'UK government' emission factor publication BEIS4 (formerly DEFRA), Ecoinvent, Exiobase and CO2emissiefactoren.be.

The data quality of scope 3 activity data and emission factors is assessed by category for the 2024 data, in line with GHG Protocol definitions. For the activity data, the quality is always 'good' or 'very good'. For the emission factors, the quality is assessed as 'fair' for categories 1 and 2 and 'good' or 'very good' for all other emission factors. Category 1 and 2 emissions are currently still calculated spend-based, which introduces a material uncertainty. However, this calculation method is the most accurate method for estimating a complete picture of Fluvius' emissions. The emissions in categories 3 and 11 for our role as social, last resort and emergency supplier are not based on consumption data during the reporting period but on billed data because of data availability.

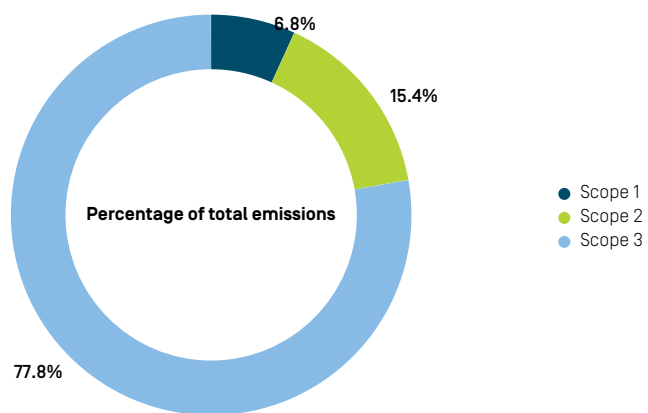
In the coming years, further steps will be taken to improve data quality. The aim is to achieve at least 'good' quality for each category. In addition, the ambition is set at 'very good' for any category where significant CO<sub>2</sub> emissions are found to exceed 5% of total CO<sub>2</sub> emissions (scope 3). This ambition will be achieved no later than the fifth calendar year after the baseline year (2024). A switch to primary data for emission factors will certainly contribute to this, but is more complex, and therefore the target is to achieve this ambition no later than the tenth calendar year after the baseline year (2024).

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<sup>1</sup> In the scope 3 calculations, 0.06% of emissions are currently calculated based on primary data for emission factors.

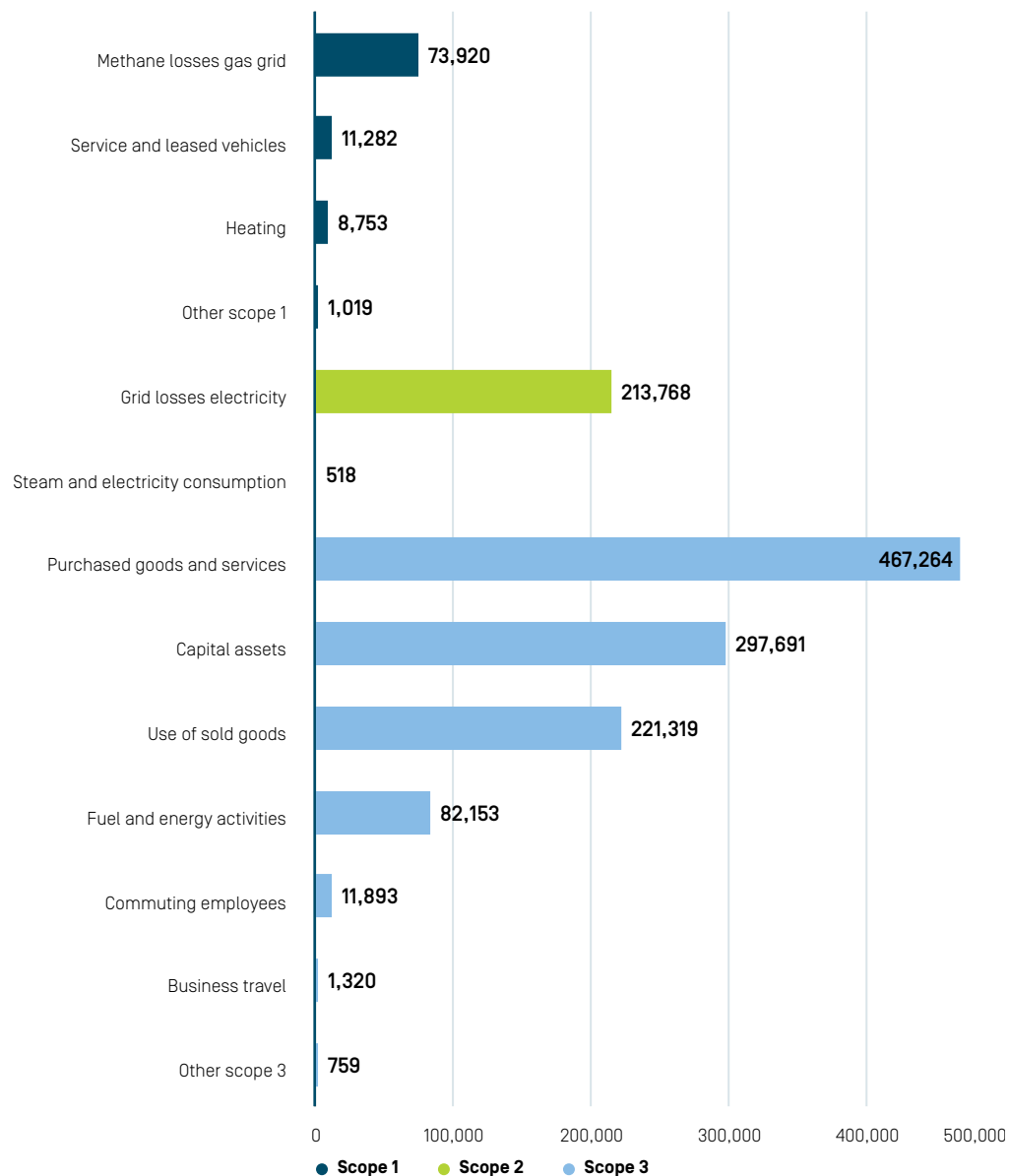
## Analysis of the results

The proportions of the different emission streams in scope 1, 2 and 3 are shown in the figures below:



From the graph on the right, we can see that grid losses from electricity, methane emissions, and the associated materials and services required to build and maintain our various networks, account for the largest share of Fluvius' CO<sub>2</sub> emissions. Emission streams resulting from our role as a social supplier, supplier of last resort and emergency supplier also have a significant share. The identification of these emission streams as the largest sources of CO<sub>2</sub> is in line with the analysis of industry peers and therefore in line with expectations. The decarbonisation plan therefore focuses mainly on reducing CO<sub>2</sub> from these streams. At the same time, we note that there is room for improvement in data quality and knowledge of the exact CO<sub>2</sub> impact of these emission streams. Efforts will be made in the coming years to achieve climate neutrality in 2050 efficiently and effectively.

## Emissions by category (in tonnes CO<sub>2</sub>-eq)



## GHG removals and GHG mitigation projects financed through carbon credits [E1-7] & Internal carbon pricing [E1-8]

Fluvius does not currently use carbon credits. As stated in the transition plan, the intention is to compensate for scope 1 and 2 emissions that cannot be avoided by 2040 at the latest. This may be done through carbon credits, but there are several other options such as investing in carbon capture & storage projects or planting forests. The strategy around offsets will be further explored in the coming years and will be developed by 2026.

Internal carbon pricing is also not yet applied. However, the potential of this mechanism is being actively explored and may be incorporated into our asset management policy in the near future.



# Pollution (E2)

At Fluvius, we are aware of our impact on the environment, particularly on air, water and soil pollution. Our activities mainly have a material impact on water and air pollution through the electricity, sewerage and gas distribution networks. We do not have a material impact on soil, but here too, we are aware of our responsibility to protect the environment. In this chapter, we discuss our efforts and measures to reduce pollution and promote a cleaner living environment. These measures often originate within the legal framework of environmental permits and emission standards.

IRO description	IRO type
Indirect contribution of Fluvius to pollution reduction by supporting the greening of the vehicle fleet	Impact positive
We collect as much pollution load as possible and clean up the waterways	Impact positive
Possible pollution from gas leaks	Impact negative

## Description of the processes to identify and assess material pollution-related impacts, risks and opportunities [E2.IRO-1]

The process for identifying material impacts, risks and opportunities follows the double materiality analysis process. No separate screening has been undertaken for IROs on pollution. The same applies to consultations with affected communities, only stakeholder consultations were carried out as part of the double materiality analysis.

The material IROs identified can be related to air and water pollution. Consequently, soil contamination, substances of (very) high concern and microplastics are not considered material.

## Policies related to pollution (E2-1)

**Fluvius' pollution policy is based on the principle that any negative impact on the air, water or soil caused by Fluvius' activities is kept to an absolute minimum and, of course, to the legally permissible standards where applicable. It is the Environment Department's responsibility to monitor this.**

### Legislative framework for pollution

Respecting the preservation of the environment during our works and operation of our networks is our minimum pollution objective. In doing so, we comply with Flemish and European legislation on the environment. This is supplemented on an ad hoc basis by specific measures and services that can have a positive impact on reducing pollution when the opportunity arises.

### Environmental permits

Applications for environmental permits are submitted to the 'Omgevingsloket Vlaanderen'. This counter is designed to ask the right questions, depending on the content of the application, in order to gather information about the details of the project to be authorised, the potential environmental impacts that may result from the project, and the mitigation measures proposed by the applicant to ensure that the potential impacts are kept to an absolute minimum and of course, where applicable, to the legally permitted standards. The level of detail required will depend on the nature and impact of the activities or project being proposed. Both human and environmental impacts are considered in an integral framework.

### Mobility

The amount of traffic caused by the project due to personnel, deliveries, work traffic, etc. For projects of limited size, this should be briefly discussed. For larger projects, a detailed mobility plan may need to be prepared by an expert.

### Soil

It must be demonstrated that the necessary measures will be taken to prevent soil contamination at the site as a result of the activities. For example, the measures taken to prevent fuel or other hazardous products from entering the soil should be discussed. Many of these measures are also listed in legislation as a legal requirement for certain activities, but the intention in this section is to discuss in detail how this will be addressed in the specific project. Examples include spill trays for the storage of hazardous liquids, regular inspection of tanks, etc.

### Water system

- **Relation to flooding:** For example, you cannot pave large areas in flood-prone areas because this will prevent infiltration. Similarly, the storage of large quantities of hazardous substances is not appropriate in flood-prone areas unless you take extensive measures to prevent accidental pollution.
- **Impact on surface water quality:** If project activities generate wastewater, it must be ensured that the discharge does not pollute rivers. The government has set standards for different types of surface water that wastewater must meet before it can be discharged. Limited deviations from these standards are possible in some cases, but must be clearly justified and demonstrate that there will be no negative impact on the receiving water system. This includes the use and design of any water treatment required to meet the standards.
- **Impact on water management rainwater:** In Flanders, there is an obligation to infiltrate rainwater runoff from paved areas (buildings, car parks, etc.) as much as possible in order to support the groundwater level and to avoid large amounts of runoff causing flooding. This aspect should also be discussed in detail for each application. There are detailed government guidelines that the applicant must follow. Again, deviations are only possible if it can be demonstrated that there will be no negative impact on the water system.
- **Groundwater:** If the project involves pumping groundwater, the principles of the Lansink ladder will be applied (in descending order of preference: limit/return flow, reuse, discharge) and all impacts must be carefully assessed to avoid damage to the environment. Flow rates and pumping depths should be kept as low as possible, possibly by the use of retaining walls or level control. Before permission can be granted to pump groundwater, it must be demonstrated that there will be no damage to the aquifer (overpumping), nature (e.g. desiccation) or buildings (subsidence).



### Air quality

This includes all types of emissions. For example, pollutants from manufacturing processes are considered, as well as dust emissions from, for example, sand storage. Again, the standards depend on the type of activity and any precautions that can or will be taken to ensure good air quality need to be discussed. The impact on air quality of emissions from internal combustion engines, such as yard machinery, is also part of this and should be discussed in detail.

### Noise and vibrations

In the case of noise, legislation includes standards to which installations and activities must conform. Measures must therefore be taken to minimise noise and vibration. For projects where noise could have a significant impact, a noise study must be carried out by an expert to determine whether the measures taken are sufficient to meet these standards. Again, site machinery that may only be used during a construction phase must be considered, as the full environmental impact of the project must be discussed. An example of this is a transformer station, where a noise barrier may be built around the transformer if deemed necessary.

### Biodiversity

This impact is very broad. In principle, every project must demonstrate that it will not harm the natural environment, regardless of the location of the project (nature assessment). More specific and stricter rules apply to projects located near Special Protection Areas (SBZ) or areas of the Flemish Ecological Network (VEN). For these areas, the government has prescribed a series of tools and reports that the applicant must use to prove that the project will not damage the protected nature. For an SBZ, these include the calculation of the nitrogen impact score on the SBZ, the pre-assessment and the appropriate assessment. For VEN areas, the extended nature assessment applies. Depending on the nature and scale of the project, one or more of these studies must be carried out to demonstrate that the project will not have a negative impact on biodiversity, with or without the use of mitigation measures.

### Severe accidents and disasters

This impact is specific to Seveso companies where large quantities of hazardous products are stored or used. These companies must have a safety report drawn up and draw up a safety management system to reduce and control risks to the surrounding area and local residents.

### Real estate heritage

If the project is situated in the vicinity of immovable heritage, it must be demonstrated that the project will not cause damage to this heritage. For example, it may be necessary to remove a monument or work of art for the duration of the works and reinstate it afterwards to prevent damage to the monument.

### Light or radiation

In addition to light pollution, this includes radiation such as electromagnetic radiation and radioactivity. Light pollution is not only about the effects on people living in the vicinity, but also about the possible effects on animals. All this should therefore be included in the discussion of light pollution. For electromagnetic and radioactive radiation, there are legal standards that cannot be exceeded, and the necessary measures must be taken to ensure this.

### Production of waste

For this, only those impacts that do not result from the storage or processing of waste should be discussed, together with the measures that can be taken to mitigate or eliminate them.

### Other and cumulative effects

If the project is likely to have other impacts on the surrounding area, or if there are cumulative impacts due to the proximity of another project, this should also be discussed in detail and the necessary mitigation measures should be taken.

## Standards

For a number of impacts, there are legal standards that must be met for the project to be approved. For example, the following regulatory standards exist:

- Discharge standards for hazardous substances in industrial effluent
- Permitted air emission limits for pollutants
- Noise standards
- Standards for electromagnetic or radioactive radiation

In the permit application, the applicant must explain in detail how it will comply with these standards.

General and sectoral conditions have been laid down by the legislator in VLAREM II, special conditions can be imposed by the licensing authority to specify, for each type of activity, the minimum conditions that must be met in order to carry out the activity. Failure to comply with these conditions constitutes an environmental offence punishable by law. These conditions are essentially obligations which, if properly carried out, will ensure that the environmental impacts of the project are largely mitigated or avoided.

## Environmental impact assessment (EIA)

The Flemish Government broadly distinguishes between three different categories of projects when discussing the environmental impact that the project may have. This subdivision is reflected in the list of projects for which it is mandatory to prepare an Environmental Impact Assessment (EIA).

An EIA is a comprehensive, detailed and extensively substantiated analysis of the possible effects of a project on the environment and an examination of possible alternatives and mitigation measures that can be taken to minimise these effects.

The legislator has drawn up a list of projects for which it is mandatory to prepare an EIA because they may have a very large impact on the environment.

In addition to projects subject to EIA, there is also a list of projects subject to screening. This means that the potential impacts of a project on this list must be assessed to determine whether they are significant or not. If significant, an EIA is still required. If not significant, a discussion of the effects and possible mitigation measures is sufficient.

For projects that do not appear on either of these two lists, only the potential impacts and mitigation measures need to be discussed and no further argumentation as to why the impacts are not significant is required. In these cases, mitigation or avoidance measures to prevent harmful effects are often consistent with and limited to the general and sectoral permit conditions contained in VLAREM II.

## Policy for indirect impact on the greening of the car fleet

### Electrification of the Flemish vehicle fleet

Fluvius makes an indirect contribution to reducing pollution by supporting the greening of the Flemish car fleet. Strengthening the electricity distribution networks is a necessary link to provide the charging infrastructure needed for the Flemish car fleet. In the [Investment plan](#), Fluvius therefore takes the assumption of a complete electrification of passenger transport and a trend towards increasing electrification of freight transport. We identify the electrification of mobility as the main factor behind the increase in peak consumption on the electricity distribution networks. The simultaneous charging of electric cars on the electricity distribution network is a major challenge for the network operator. The assumptions made in the Investment plan are in line with the [Flemish Energy and Climate Plan](#).

For passenger transport and light freight, forecasts were made for the number of vehicles, kilometres travelled and electrification scenarios, based on information from industry associations, the Flemish government and Fluvius itself. Market developments, legislation, recent political decisions and customer acceptance were all taken into account. The investments we make as a grid operator are spread over different types of charging points (home, workplace, public). We are also responding to the potential charging behaviour of grid users and taking measures to reduce peak consumption.

The [Energy Decree](#), to which Fluvius is subject, stipulates that a grid operator and its operating company may not own, develop, manage or operate charging points for electric vehicles, unless they themselves own private charging points exclusively for their own use (e.g. in the car parks of office buildings). The (fast) charging infrastructure for electric vehicles in Flanders is therefore not managed by Fluvius, but charging points with a capacity of more than 5 kVA must always be notified. The Flemish government coordinates the roll-out of public charging points and Fluvius provides the necessary investments for the connection and reception of this charging capacity.

Public transport will also be electrified. Fluvius and De Lijn have signed a cooperation agreement to achieve electrification by 2035. De Lijn and its operators have already started this conversion, with the option of 100% battery-electric buses. Fluvius' roll-out plans are therefore coordinated in close cooperation with De Lijn as a key partner.

There is a growing belief in the electrification of heavy goods transport. Europe is pushing for the expansion of the charging infrastructure for electric freight transport. Flanders is promoting the electrification of heavy goods vehicles through measures in the Flemish Energy & Climate Plan.

Heavy goods vehicles will mainly be charged at high voltage in car parks next to major traffic routes. We also include these necessary extensions in the Investment plan. In addition to location and time, the energy required is also an issue we need to prepare for. We are therefore not ruling out alternative energy sources.

Finally, ports are also served by the electrification of shipping via shore power. Each type of vessel requires a different connection capacity to shore power. Fluvius regularly consults with the ports of Ghent and Antwerp-Bruges. For inland waterway transport, the power requirements for each type of ship have also been mapped and we work together with De Vlaamse Waterweg. We monitor developments, so that we can plan the right investments for this mode of transport as well.

### Own car fleet

Fluvius itself has an extensive fleet of 3,819 vehicles, including passenger and service vehicles. Fluvius is taking an exemplary role in the electrification of this fleet in order to reduce the pollution caused by these vehicles. The greening of the Fluvius fleet is an integral part of Fluvius' overall mobility policy (see also policy on [Climate mitigation](#)). The Fluvius fleet greening policy is based on three pillars: reduce, improve sustainability, change.

From 1 July 2023, only full-electric leased cars could be ordered. From 1 January 2024, executives could opt for a mobility budget. In this way, we are gradually reducing the CO<sub>2</sub> emissions of our own fleet. We are also reducing other forms of air pollution from the fleet as much as possible. In order to control this additional pollution, Fluvius has drawn up technical specifications for vehicle management. These specifications define the quality requirements for tyres. At least B-quality tyres are always chosen, with a trade-off between safety (grip on wet roads) and wear resistance. The maximum noise level is set at 73 decibels.

Fluvius has recently received two awards for the efforts it has made with its own fleet: Fluvius Fleet Manager Dries Dennequin was named Fleet & Mobility Owner of the Year 2023, and Fluvius was also named Truck Fleet Owner of the Year 2024.

## Policy for collecting pollution load and cleaning watercourses

As also explained in the chapter [Water and marine resources \[E3\]](#), Fluvius acts as a sewerage manager. In this role, the company has a significant positive impact in the operating area of the Flemish municipalities where Fluvius has been appointed as sewerage manager to collect as much pollutant load as possible and to clean up the watercourses.

The legal framework of the Integrated water Policy and the targets set out in it provide a clear minimum standard that Fluvius must meet with regard to the quality of the watercourses. However, Fluvius is not the only actor influencing water quality in Flanders, but it can of course make a significant positive contribution.

The European Water Framework Directive, in which Europe aims to have clean watercourses by the end of 2027 at the latest, is the driving force behind Fluvius' sewerage policy. In order to achieve these quality standards, it is necessary on the one hand to increase the connection rate and on the other hand to reduce accidental discharges:

- Continuous pollution of watercourses is avoided by increasing the connection rate, so that as much of the pollution load as possible is collected and cleaned and does not enter the watercourses.
- Accidental pollution of watercourses can occur during overflows. The principle of an overflow is that untreated water is discharged outside the sewerage system. This can be through an overflow into a rainwater drainage system or directly into surface water.

Overflows tend to occur during periods of heavy rainfall, which can be expected to increase as the climate warms. In places where separate sewerage systems are not yet in place, rainwater overloads the local and supramunicipal sewerage system, which is unable to cope with the influx of rainwater and discharges this water directly into surface water via the means provided. By separating the sewerage system, the risk of overflow is reduced as these rain weather drainage systems only contain rainwater and the amount of rainfall no longer directly affects the dry weather drainage system. These separate sewerage systems also aim to manage and infiltrate water as locally as possible, replenishing groundwater levels and reducing run-off into watercourses.

## Policy for avoiding and reducing gas leaks

Methane, like CO<sub>2</sub>, is a greenhouse gas that contributes to air pollution and global warming. In Fluvius' operations, methane is released during the distribution of gas, specifically due to leaks:

- Emissions from leaks identified by gas smell reports
- Emissions caused by third-party damage
- Emissions from leaks detected by leak surveys

Both the [European Methane Strategy \[14 October 2020\]](#) and the [Flemish Energy and Climate Plan](#) include measures and targets to reduce methane emissions. Fluvius supports these plans and is committed to reducing this type of air pollution to a minimum.

In accordance with the [European regulation on methane emissions \[EU 2024/1787 of 15/07/2024\]](#), Fluvius aims to reduce methane emissions from gas distribution activities. The above-mentioned regulation does not set binding targets, but it does set rules:

- **Monitoring, reporting and verification of emissions (MRV):** there are specific timeframes for the operators to submit their first reports on potential methane emission sources as from the entry into force of the Regulation.
- **Detection and repair of methane leaks (LDAR: Leak Detection And Repair):** The leak detection and repair will take place on the basis of a risk-based approach. Operators are obliged to periodically investigate their appliances in order to detect and tackle methane leaks in accordance with minimum detection limits and leak thresholds.
- **Reduction of venting and flaring (V&F):** Venting and flaring methane from drain stations and ventilation shafts will be forbidden by 2025 and 2027 respectively. There is a duty to report venting/flaring with the supervisory authority.

The modalities will be defined in CEN (Centre Européen de Normalisation) standards.

## Policy for pollution incidents

To prevent incidents and emergencies and, if they do occur, to manage and limit their impact on people and the environment, an internal environmental incident<sup>1</sup> and complaint<sup>2</sup> management policy is in place. This policy takes into account legal obligations and is also used to prevent the recurrence of incidents and complaints. It also includes key internal and external contact details relevant to the process.

When a (threat of an) environmental incident is identified by internal employees or external persons, a number of technical, organisational and administrative steps should be taken. These steps are timed (immediately, working day after the incident, within the working week after the incident, within the month after the incident).

Contractors carrying out work on behalf of Fluvius may also be confronted with an environmental incident during their work. In this case, the contractor is expected to follow the same *modus operandi* as for environmental incidents involving its own personnel.

Complaints can be received through various communication channels:

- complaints management
- ombudsman service
- region
- telephone contact, local authority
- ...

These complaints will be handled in accordance with the internal complaint management system. In each case, they will be referred to in the complaints management system as 'environmental complaints'. The Environment Department will determine whether further action is required, possibly on the basis of an investigation. If action is required, it is co-ordinated by the Environment Department.

Environmental complaints and incidents are always recorded in an 'environmental complaints and incidents' register, where information on the nature of the incident and further action taken is kept. This register is maintained by the Environment Department.

<sup>1</sup> An environmental incident is an acute or sudden event, such as a fire, explosion or accidental emission, caused by an uncontrolled development during operations that may affect people or the environment either immediately or over time.

<sup>2</sup> Environmental complaints are complaints received from third parties (neighbours, occasional passers-by, companies, etc.) about Fluvius' activities, relating to the living environment.

## Contribution to the EU Zero Pollution Action Plan

The EU's Zero Pollution Action Plan for 2050 aims to reduce pollution of air, water and soil to levels that are not harmful to human health and the environment, while respecting ecosystem limits and the creation of a healthy environment. This has been translated into targets for 2030 to reduce pollution at the source. These targets include:

- Improve air quality to reduce premature deaths from air pollution by 55%;
- Improve water quality by reducing waste, marine plastic waste (by 50%) and microplastics in the environment (by 30%);
- Improve soil quality by reducing nutrient losses and the use of chemical pesticides by 50%;
- Reduce the number of EU ecosystems where biodiversity is threatened by air pollution by 25%;
- reduce the proportion of people chronically disturbed by traffic noise by 30%;
- and to significantly reduce waste generation and municipal residual waste by 50%.

Fluvius' material impact on pollution contributes to the EU's Zero Pollution Action Plan in the following ways:

- The greening of the vehicle fleet reduces air pollution and traffic noise;
- The collection of pollutant loads and the cleaning of watercourses improve water quality;
- Reducing emissions caused by network losses in the gas distribution network, thereby contributing to a reduction in air pollution.

In addition, material impacts within other themes also contribute to the EU's Zero Pollution Action Plan. For example, more sustainable use of materials and recycling will reduce waste generation.

# Actions and resources related to pollution (E2-2)

## Global environment and climate plan

Every five years, Fluvius draws up a global environmental and climate plan, which describes the most important measures for structural pollution control, taking into account the applicable legal framework. Every year, an action plan will be drawn up with concrete short-term measures. In 2024, pollution-related measures were included in the following areas:

- Soil management: PFAS, soil testing and remediation
- Groundwater and water management: site drainage
- Inspection and emission management
- High and medium-voltage electromagnetic fields
- Methane emissions
- CO<sub>2</sub> emissions

In addition, environmental management processes are continuously improved and regular visits are made to infrastructure sites and (non-)network sites. Environmental permits are applied for, renewed, managed and monitored centrally. The environmental risks to which Fluvius is exposed in its business processes are assessed and, where necessary, processes and corresponding documentation are adjusted.

As disclosed in note 26 of the Fluvius Economic Group financial statements, provisions have been made for the remediation of gas plant sites and other contaminated sites.

## Measures and means for greening the Flemish car fleet

### Resources within the Investment Plan

As explained in the [Policy for indirect impact on the greening of the car fleet](#), Fluvius is making the necessary resources available for the electrification of the Flemish vehicle fleet within the framework of the [2024-2033 Investment plan](#). The measures consist mainly of reinforcing the electricity distribution networks in order to connect the charging points and provide the necessary capacity. As the electrification of the car fleet plays a major role in the peak consumption on our grids, measures are also being taken to spread and reduce this peak.

### Research projects

Fluvius wants to follow up innovations by participating in research projects. In this way, we want to investigate their feasibility on a large scale, as well as test and shape the industrialisation of these developments. Research projects related to the greening of the Flemish car fleet are often integrated into broader research projects on energy. These will be explained in [Strategic research and living labs](#).

### Study for smart charging hubs

A recent study carried out by Fluvius and Bond Beter Leefmilieu (BBL) in collaboration with The New Drive has mapped the potential of smart charging hubs in Flanders. By 2030, Flanders could be home to up to 1,096 public charging hubs with 6,600 charging points. This is an important step to support the further deployment of charging infrastructure on public land.

The establishment of smart charging hubs or charging squares plays a crucial role in the future of electric mobility, with benefits for citizens, local governments and network operators. Smart charging hubs are central locations where two or more charging points are offered through a single grid connection. This allows multiple electric vehicles to be charged at the same time and, through the use of 'smart charging', a potentially lower load on the grid.

The full study is available at [this link](#).

## Own fleet

Fluvius has a fleet of 3,819 vehicles and has the ambition to make it more sustainable, partly in the context of the CO<sub>2</sub> reduction targets as explained in the section [Targets](#).

Building on the three pillars of the policy, the following measures have been taken:

- Reduce
  - Reduce or avoid travel
  - Travel differently: carpooling, cargo bikes, reserved cars, train/tram/bus, also for business trips
  - Reduce consumption by using more fuel-efficient service vehicles
  - Change driving behaviour through driver training
- Become more sustainable
  - Complete electrification of leasing vehicles by 2028
  - Switch to electric service vehicles: where the technology is affordable and taking into account the impact on the employee (load capacity and load volume, tasks and assignments, daily range, availability of charging infrastructure, etc.).
  - Where an electric vehicle is not possible, try to use a more fuel efficient vehicle and replace polluting and older vehicles more quickly.
- Change
  - Create support for electric vehicles
  - Launch a practical information campaign
  - Launch various pilot projects

## Roadmap sewerage

One of the actions in the sewerage roadmap is described as 'We collect as much pollution load as possible and clean up watercourses'. This action responds to the European reduction targets for cleaner watercourses by 2027 and, consequently, stricter reduction targets by 2033. Fluvius therefore offers increased connection rates and separate sewer systems so that rainwater (rain weather drainage) is collected separately from dirty wastewater (dry weather drainage). We use our expertise and knowledge of asset management to make informed decisions about the maintenance and replacement of sewer systems. The aim is to efficiently improve water quality in Flanders without losing sight of our existing assets. To this end, we have a defined budget, capacity and subsidies (provided by the Flemish government). Fluvius has therefore made the following commitment:

- We spend minimal investments to maintain and optimise the existing network
- We give priority to the projects that make the greatest contribution to realising the objectives as formulated by VMM
- We realise the sewerage projects more efficiently

An explanation about the Sewerage Investment Plan can be consulted in the chapter relating to the [Roadmap sewerage](#).

## Action plan to reduce methane emissions

Several measures are being taken to reduce methane emissions:

- **Replacing outdated materials:** Modern polyethylene (PE) distribution pipes have very low leakage compared to grey cast iron or fibre cement pipes. Since 1989, the vast majority of these old pipes has been replaced with PE pipes on a case-by-case basis (e.g. road works). Our aim is to phase out grey cast iron and fibre cement gas pipes completely by 2030.
- **Leak detection:** Fluvius proactively checks the gas distribution network for possible leaks. We do this with high-quality detection equipment that can detect very low concentrations of methane. By doing this in a well-considered and qualitative way, we can detect and repair leaks even faster. Each year, between 20 and 25% of the gas distribution network is subjected to this type of testing, with special attention paid to the least efficient parts of the network. This method not only makes our gas networks even safer, but also minimises methane emissions.
- **Connections without gas loss:** In addition to the quality of our materials, we are constantly improving our techniques. For example, we make sure that no gas is lost when we connect new customers to the gas network. This has been our standard practice for more than 20 years.
- **Medium pressure connections with gas stopper:** The so-called gas stopper is a valve that we install in the connection pipe. In the event of an abnormally high flow rate, for example if a gas installation is damaged, this valve closes. This ensures both safer installations and a significant reduction in methane emissions in the event of an incident.
- **Hot tapping:** Hot tapping is a technique that allows us to make connections to pipelines under pressure. This means we no longer have to shut down sections of our network during work, which was usually associated with high methane emissions.
- **Pressure reduction during work:** Unfortunately, hot tapping is not always possible. Where this is not possible, we reduce the pressure in the affected part of the network to the lowest possible level before starting work. This in turn minimises the amount of gas released into the atmosphere.
- **Avoiding incidents:** Gas pipelines can sometimes be damaged, especially during road works. In the worst case, this can lead to a leak. To prevent this from happening, Fluvius informs contractors about the presence of pipes and installations and what to do to prevent damage. As a result, we avoid dangerous situations, our repair costs fall and less gas escapes.

Over the last few decades, technology has evolved considerably and, despite the significant growth of the gas distribution network, methane emissions have been systematically reduced. Efforts in leak detection, adapted working methods and tools, prevention... have undoubtedly contributed to this.

We are working on a number of additional initiatives to further minimise our methane emissions:

- **OGMP:** Fluvius is a member of the Oil & Gas Methane Partnership (part of the UN Environment Programme). Companies that join the partnership commit themselves to a comprehensive, measurement-based reporting framework that improves the accuracy and transparency of methane emissions data. Within the OGMP framework, Fluvius has achieved Gold Standard Reporting.
- **OGMP 2.0:** While a conservative approach previously estimated the magnitude of natural gas emissions at around 0.2 megatonnes of CO<sub>2</sub> eq, the application of a more detailed calculation methodology according to OGMP 2.0 will provide a more accurate emissions figure. To this end, we will list all activities within Fluvius where natural gas is or may be released and calculate methane emissions specifically for each activity.
- **Awareness campaigns:** All too often, gas pipelines are still damaged during groundworks, sometimes resulting in leaks. We therefore continue to promote awareness among our contractors and our own employees, regularly reminding them of the risks and precautions to take. The benefits of preventing such incidents are clear: fewer dangerous situations, lower repair costs and, above all, a positive impact on methane emissions.
- **Rehabilitation:** We continue to renew gas networks where appropriate. To minimise the risk of potential leaks, we prioritise rehabilitation work based on the risk of leakage and the condition of the pipelines.
- **Actions based on further analysis:** By taking a more detailed approach, Fluvius will have a better understanding in the future of where action can be taken to minimise methane emissions in a socially responsible way.
- **Excavation damage:** In 2025, a working group will be set up to minimise excavation damage through preventive measures, holding (principals of) companies that cause damage accountable and evaluating regulations (reactive).
- **Sectoral coupling:** Industrial sectors or activities that emit methane can also contribute to reducing overall methane emissions. If these sectors or activities could capture some of their methane emissions and make them suitable for injection into the gas distribution network, they would not only reduce emissions but also contribute to a climate-neutral energy transition. Fluvius wants to participate constructively in new or ongoing research initiatives and, where appropriate and profitable, implement biogas plants for these customers.



# Targets related to pollution (E2-3)

## Objectives for greening Flemish car fleet

### Investment plan rollout

The [Investment plan](#) is based on a number of assumptions regarding the electrification of the Flemish car fleet. These figures are in line with the updated [Flemish Energy and Climate Plan](#). In this plan, Flanders expresses a clear ambition for electric mobility in passenger, public and freight transport. Among other things, the Flemish government wants to install 35,000 (semi-)public charging points by 2025 and 100,000 (semi-)public charging points by 2030. We expect 1.5 million electric vehicles by 2030 and full electrification of 3,850,000 electric vehicles by 2050.

Fluvius sets targets for the speed of deployment of the Investment plan that correspond to the 'no regret' investments needed to meet the Flemish targets discussed above. These targets are set after extensive consultation with stakeholders.

### Own fleet

The targets for the greening of its own fleet are defined by vehicle type. On the one hand, there is the electrification of vehicles up to 3.5 tonnes by 2028. On the other hand, fuel-saving measures are being taken for heavier vehicles, with the aim of achieving an overall reduction of 25% in this category by 2030.

## Sewerage reduction targets

The regulator VMM has developed a proposal for each party, municipality and water body to achieve the concretely described water quality objectives. In Fluvius, these European objectives are called '**reduction targets**'. Compared to the situation in 2017, the pollutant load discharged into watercourses must be reduced by a certain number of (existing) inhabitants. These targets assume that no additional development will increase the pollution load. In addition, for each municipality, the **sanitation rate must be at least 50% by 2027**. This is not yet the case for all the municipalities that have entrusted their wastewater management to Fluvius. In 2024, € 150,185,080.53 was invested in the sewerage networks, in accordance with the EU Taxonomy.

## Methane emission reduction targets

As stated in the [Decarbonisation levers](#) in the Transition Plan, Fluvius is committed to reducing methane emissions. Reduction targets for methane emissions have also been set at Flemish level and are monitored by VEKA (Vlaams Energie- en Klimaatagentschap - Flemish Energy and Climate Agency). Fluvius is aiming at reductions as disclosed in the table below, which will also be included in the renewed Flemish Climate Plan.

	Base year 2023	2030	2040	2050
Methane emissions (in tonnes)	2640	2216	1427	742
Reduction		16%	36%	48%

## Pollution of air, water and soil (E2-4)

Air and water pollution were identified as material impacts in the double materiality analysis. Emissions to soil and the generation and use of microplastics were considered non-material. The European Pollutant Release and Transfer Register (E-PRTR) Regulation<sup>1</sup> lists a number of thresholds for pollutant emissions to be reported<sup>2</sup>. However, the reporting obligation of operators (see Article 5) is limited to business activities nominally listed in Annex 1 of the Regulation. The activities carried out by Fluvius are not among these, as can be seen from our environmental permits. It can therefore be assumed that the thresholds are not exceeded.

<sup>1</sup> Regulation (EC) No 166/2006 of the European Parliament and of the Council

<sup>2</sup> The thresholds can be consulted at Regulation - 166/2006 - EN - EUR-Lex



# Water and marine resources [E3]

As the sewerage manager for 87 Flemish cities and municipalities, Fluvius helps Flanders to adapt to climate change. We consider the entire water cycle as a link in the chain of sustainable water management.

IRO description	IRO type
We are helping to reduce Flemish drinking water consumption by optimising synergies in digital water meter installation (VoR action 1)	Impact positive
We help Flemish families use alternative water sources. (VoR action 2)	Impact positive
We buffer and infiltrate run-off rainwater and, where economically feasible, we enable take-up on the rainwater system (VoR action 4)	Impact positive
We are committed to recovering discharged water (VoR action 5)	Impact positive
Drainage of groundwater through sewerage infrastructure	Impact negative
Impact on surface water due to discharge from overflows	Impact negative
Investment required to separate sewer systems and increase sewerage rates	Risk
Synergy service distribution water	Opportunity

**87**  
Number of cities and municipalities where Fluvius is sewerage manager

**100%**  
Percentage of cities and municipalities where Fluvius is the wastewater manager with a rainwater and drought plan

**150**  
Total investment in sewerage activities 2024 (million euros)

## Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities [E3.IRO-1]

The construction and operation of sewerage networks is one of Fluvius' main activities as a sewerage operator. This gives rise to significant impacts, risks and opportunities on the water cycle. No material IROs have been identified for marine resources.

The process for identifying material impacts, risks and opportunities follows the double materiality analysis process. No separate screening was performed for IROs related to water and marine resources. The same applies to consultations with affected communities. Only stakeholder consultations were carried out as part of the double materiality analysis.

## Policies related to water (E3-1)

**Fluvius' water policy is twofold. On the one hand, there is the sewerage activity carried out on behalf of cities and municipalities, for which Fluvius is the sewerage operator. This activity has an impact on the watercourses and the water cycle in Flanders. On the other hand, Fluvius uses water for its own operational activities.**

### Legislative framework on water

The integrated approach to water policy is also reflected in regulations: at European level in the Water Framework Directive and the Floods Directive, and in Flanders in the Decree on Integrated Water Policy. Further regulations have also been prepared within the consultative structures of the integrated water policy. Fluvius subscribes to the climate ambition of the European Commission and follows the legislative framework at all levels as a guide in shaping its own policy and implementing its activities.

### Water Framework Directive (Europe)

One of the most important environmental directives for water is the [European Water Framework Directive](#). In force since 22 December 2000, it sets out a single water policy for the European Union. The aim of the Water Framework Directive is to protect Europe's water resources and water quality and to mitigate the effects of floods and droughts. The Water Framework Directive requires member states to use water sustainably. To do this, they must draw up management plans for each river basin.

The Water Framework Directive also has several daughter directives:

- The [Groundwater Daughter Directive](#) provides a framework for prevention and control measures to combat groundwater pollution. This includes measures to assess the chemical status of groundwater and to reduce the presence of pollutants.
- The [Priority Substances Daughter Directive](#) sets surface water quality standards for a number of dangerous substances.

### Floods directive (Europe)

The [Floods Directive of 23 October 2007](#) aims to ensure that member states are better able to assess flood risks and take measures to reduce them. It builds on the structures and plans of the Water Framework Directive.

The Floods Directive requires member states to consider which areas are at risk of flooding. Flood risk maps and management plans will be drawn up for these areas.

### Decree on Integrated Water Policy (Flanders)

In Flanders, the [Decree on Integrated Water Policy of 18 July 2003](#) provides the legal and organisational framework for water policy making. The decree also contains the transposition of the Water Framework Directive and the Floods Directive into Flemish legislation.

The Decree:

- lays down the objectives and principles of an integrated water policy, with a strong emphasis on the multifunctionality of water systems;
- provides for a number of instruments to better implement the integrated water policy: the water test, the riparian zones, the instrument mix acquisition of real estate, purchase obligation and compensation obligation and the information obligation for real estate in flood prone areas;
- determines how water systems are divided into river basins and river basin districts, basins and sub-basins;
- translates the division into water systems into the organisational structure and planning for integrated water policy.

The Decree on Integrated Water Policy (Title I of the Water Act) is a framework decree and contains only the policy's broad outlines.

Implementing decrees specify and complement the overall policy:

- A [first implementing decree \(Organisation Decree, 9 September 2005\)](#) provides for the geographical division of water systems. This is done by defining river basin districts, basins and sub-basins in the Flemish Region. This decree also contains additional provisions on the functioning of the consultation structures at the different levels.
- The [Water Test Implementation Decree \(20 July 2006\)](#) provides guidelines for the application of the water test to local, provincial and regional authorities issuing permits. More information on the Water Test Implementation Decree can be found at [www.watertoets.be](http://www.watertoets.be).
- The [Decree on Financial Instruments \(24 July 2009\)](#) implements the financial instruments of the Decree on Integrated Water Policy: expropriation for public use, right of first refusal, obligation to purchase and obligation to compensate.

### Additional regulations from integrated water policy consultation structures

In addition to the Integrated Water Policy Decree and its implementing decrees, subsequent regulations have also been prepared within the Commission for Integrated Water Policy (CIW):

- The Decree on Environmental quality standards for surface Water, groundwater and water soils (Flemish Government Decree of 21 May 2010) sets environmental objectives for the good status of surface water and groundwater through environmental quality standards and also includes environmental quality standards for water soils.<sup>1,2</sup>
- The decree on Special obligations river basin districts (Flemish Government decision of 21 May 2010) describes the location and boundaries of the Flemish groundwater bodies.
- The decree on establishing the updated water status monitoring programme (Flemish Government Decree of 24 April 2013).
- The decree on transposing the revised priority substances directive (RL 2013/39/EU) (Flemish Government Decree of 16 October 2015)
- The decree on Environmental quantity objectives for surface water (Flemish Government Decision of 8 January 2016) contains criteria for flood risk management objectives and surface water deficit management objectives.
- The code of good practice for the design, construction and maintenance of sewerage systems (Ministerial Decree of 20 August 2012) is the guide for Aquafin, sewerage operators, municipalities and study companies when designing sewerage infrastructure.

- The Code of good nature practice for watercourses (Flemish Government Decree of 10 July 2015) clarifies how the general duty of care of the Nature Decree must be fulfilled when maintaining watercourses.

The Coördinatiecommissie Integraal Waterbeleid (CIW - Integrated Water Policy Coordination Committee) is a consultation platform for the various policy areas and levels of government involved in water policy. Wastewater and drinking water companies and representatives of the provincial governors also participate in the consultation. This cooperation ensures a coordinated and integrated approach to water policy and water management in Flanders.

### Water policy note

The [water policy note](#) is a policy document of the Flemish Government that contains the general vision of the integrated water policy and an overview of the water management issues to be addressed. As a vision document, the water policy document gives direction to the river basin management plans and other initiatives by indicating the priorities of the integrated water policy.

The water policy note is prepared, implementing the Decree on Integrated Water Policy of 18 July 2003, coordinated on 15 June 2018. This decree stipulates that the Flemish Government will review the water policy memorandum every six years. The Coordinating Committee for Integrated Water Policy (CIW) is responsible for its preparation.

### River basin management plans

On 1 July 2022, the Flemish Government adopted the [river basin management plans 2022-2027](#) for the river Scheldt and the river Meuse and the accompanying programme of measures. The plans contain measures and actions to improve the quality of groundwater and surface water and to protect against floods and droughts.

The river basin management plans 2022-2027 consist of several parts: one part for the river basin districts of Scheldt and Meuse, eleven basin-specific parts and six groundwater system-specific parts. The zoning plans - which show where collective wastewater treatment is to be built and where individual treatment is to be provided - and the area-wide implementation plans - which

<sup>1</sup> The decree of 16 October 2015 introduced changes to the standards for surface water and waterbeds. See the coordinated text of the basic environmental quality standards for surface water (Vlarem, Title II, Annex 2.3.1).

<sup>2</sup> The decree of 20 May 2016 amended the background levels, threshold values and environmental quantity criteria for groundwater. Consult the coordinated text of the environmental quality standards and environmental quantity criteria for groundwater (Vlarem, Title II, Annex 2.4.1).

regulate the implementation and timing of municipal and supramunicipal wastewater treatment projects – are also part of the river basin management plans.

The flood risk management plans, which implement the European Floods Directive, are integrated into the river basin management plans. And after the dry summer of 2017, it was decided to integrate a water scarcity and drought risk management plan into the river basin management plans for 2022–2027 as well.

## Water execution programme (WEP)

The [water execution programme](#) reports on the implementation of the river basin management plans and looks ahead to the implementation of the following years.

In addition to an integrated progress report on the implementation of the programme of measures of the river basin management plans 2022–2027, the WEP also contains an implementation plan for the following years. The WEP is both a reporting and an operational tool. Through the WEP, measures can be added, adjusted or stopped.

## Policy tools

A number of policy tools are available to put the integrated water policy into practice:

- **Water test:** The water test is a tool used by the authority deciding on a permit, plan or programme to assess its impact on the water system. The result of the water test is included as a water paragraph in the permit or in the approval of the plan or programme.
- **Information obligation:** The information obligation for properties in flood-prone areas was introduced in the Decree on Integrated Water Policy by an amendment of 19 July 2013. An amended information obligation came into force on 1 January 2023.
- **Multi-layered water safety:** Multi-layered water safety stands for a combination of measures that control critical floods (protection), measures that prevent or reduce flood damage (prevention) and measures that ensure that we are well prepared when a flood occurs (preparedness).
- **Blue Deal:** With the Blue Deal, the Flemish government wants to make Flanders structurally resilient to water scarcity across all sectors, increase circular water use and ensure higher water availability.
- **Building and living in flood zones:** Information on building and living in flood-prone areas.

- **Signal areas:** Signal areas are undeveloped areas with a fixed designation in the regional plan (residential area, industrial area, etc.) that can also fulfil a flood management function because they can be flooded or because they act as a natural sponge due to specific soil properties.
- **Water sensitive open spaces:** Designation as a water sensitive area means that the current zoning of the area (residential area, industrial area, ...) can no longer be implemented. For example, no more permits can be issued for new housing or businesses in these areas. On 19 July 2024, the Flemish Government definitively approved the designation of 139 water-sensitive open spaces. With this decision, more than 710 ha of flood-prone open space will be protected from building and further development and thus from future flood issues.
- **Demarcated flood plains:** The Decree on Integrated Water Policy allows for the planning of the necessary water space by demarcating flood plains.
- **Demarcated riparian zones:** Riparian zones are an integral part of the water system. They contribute significantly to the balance of the water system. To ensure that floodplains can fulfil their function, the Integrated Water Policy Decree imposes restrictions on the use of riparian zones.
- **Financial instruments:** A mix of instruments such as expropriation, right of first refusal, obligation to purchase and obligation to compensate can be used to support the demarcation of flood plains and riparian zones in practice.
- **Enforcement:** Enforcing the correct connection of private drainage (connection of wastewater and disconnection of rainwater) is one of the priority topics for enforcement within the integrated water policy.
- **Digital atlas:** Digital atlas of ranked unnavigable watercourses and public canals.
- **Rainwater and drought plans:** In recent years, there has been a growing recognition that we need to manage our rainwater differently. A rainwater and drought plan, with an integral vision of where and how we infiltrate or reuse rainwater in an area as much as possible on site, buffering it and only releasing it as a last resort, hereby contributes.

## Role of Fluvius as sewerage manager

As also explained in the [Business model](#), Fluvius has the role of sewerage manager at municipal level in 87 Flemish municipalities within the sewerage market in Flanders. The role of regulator is taken up by the Vlaamse Milieumaatschappij (VMM - Flemish Environment Agency).

As sewerage operator, Fluvius carries out the following activities:

1. the development, sustainable management and optimisation of infrastructure for the collection, transport and, where appropriate, decentralised or individual treatment, up to the takeover point to the supramunicipal infrastructure, of the following waters:
  - domestic wastewater resulting from the use of water supplied by the drinking water company;
  - domestic wastewater resulting from the use of water from a private water supply;
  - water other than that referred to in the previous points for which discharge into the sewerage system is authorised by law;
2. the development, sustainable management and optimisation of public infrastructure used in the context of the activities referred to in point 1, either for the collection, infiltration, buffering and discharge of rainwater or other water for which discharge via such infrastructure is legally permitted, with maximum encouragement for infiltration and buffering via natural means or via green-blue infrastructure and for the use of rainwater;
3. maximising the promotion of infiltration and buffering by natural means or by green-blue infrastructure and the use of rainwater;
4. to fulfil the obligations laid down in this decree.

## Vision on sewerage

Fluvius has described its vision on the development of sewerage and how Fluvius can contribute to mitigating water problems due to climate change in its 'Vision on sewerage in the water cycle'. This vision document has been validated by the Management Committee and the accompanying policy and package of measures will be followed up by the relevant divisions and departments. Fluvius always supports the European Commission's climate ambitions and follows the legal framework at all levels as a guide in the implementation of its activities.

Climate change causes temperatures to rise. On the one hand, this leads to periods of drought in which there is an increased need for (clean) water due to the reduced availability of (raw) water. On the other hand, it increases the risk of floods and inundation due to more intense rainfall.

The extreme hardening of our subsoil, often accompanied by drainage, prevents the infiltration of rainwater and exacerbates the negative consequences.

Climate change and paving are putting pressure on the water cycle and, contrary to perception, make Flanders one of the most water stressed areas in Europe. As a result, we regularly face imminent or actual water shortages; summer groundwater levels and water levels/flows in watercourses in our region are sometimes low for several years, sometimes too low to be able or allowed to use the water.

Sewers were designed to dispose of and treat wastewater to improve sanitation. In the past, rainwater was drained along with wastewater. As a result, during heavy rainfall, pipes and treatment plants were overwhelmed and diluted, untreated wastewater was discharged into watercourses. Separate sewerage systems, in which rainwater (RWA net, rain weather drainage system) and wastewater (DWA net, dry weather drainage system) are disposed of separately, prevent this. Accelerated rainwater runoff protects from flooding upstream, but creates problems downstream. DWA sewers also prevent rainwater from infiltrating where it has fallen. Therefore, every effort is made to localize rainwater, so that it can infiltrate without causing flooding.

At Fluvius, we believe that more circularity and the restoration of the natural infiltration situation for the water cycle can be a key to mitigating the effects of climate change. Raw water supplies for drinking water production are provided from other sources (buffers). Where rainwater does not infiltrate, it is collected and made available as secondary water to reduce the average demand for drinking water.

For Fluvius, there are four main axes on which we work to achieve this:

- We contribute to reducing the consumption of drinking water in Flanders
- We strive to maximize the circular use of water and (re)install the natural cycle for rainwater
- We make the sewerage networks future-proof
- We make the information about the sewerage system available to the users of the system

The measures that contribute to these goals are explained in [Actions and resources related to water \(E3-2\)](#).



## Rainwater and drought plans

As required by the river basin management plans, cities and municipalities must have a rainwater and drought plan in place from 1 January 2025 in order to qualify for subsidies for sewerage projects. Fluvius prepares such a plan for all cities and municipalities where we are the sewerage operator.

Drawing up a rainwater and drought plan gives shape to an integral, supported and comprehensive vision of the entire water system in the municipality. Only by looking at the water system as a whole (groundwater, surface water and rainwater) and with all the partners involved will it be possible to tackle flooding and water scarcity in a well-considered way. An area-wide vision provides a comprehensive view of the municipality, taking into account not only the built environment, but also agriculture, nature, recreation, industry, mobility, and so on. Translating the vision into measures on the ground will lead to the final and most important goal: the development of a water system that is resilient to the effects of climate change and thus contributes to a climate-resilient and liveable environment.

The basic principles and spatial ideas of a rainwater and drought plan are therefore integrated into or developed together with other policy plans of the local government (climate adaptation plan, green plan, spatial policy plan, etc.). The principles and spatial concepts of a rainwater and drought plan are preferably also integrated into the plans and developments of other actors (public and private) working in the municipality.

Each area is unique: it has its own subsoil, existing drainage and watercourse system, relief, urbanisation, building type, opportunities, needs and bottlenecks. A rainwater and drought plan is therefore tailor-made for the local authority area.

Rainwater and drought plans are always prepared according to a blueprint issued by the Coordinating Committee for Integrated Water Policy. This blueprint includes objectives, a methodology for preparing the plan and an overview of good practices that may be useful in preparing and implementing the plan. A rainwater and drought plan is valid for six years and must be updated thereafter. The plans should be made publicly available, which can be done through the municipality's website or the Fluvius website.

Actions arising from these plans can be the subject of Fluvius' sewerage investment plans. These are explained in [E3-2](#).

## Synergy with drinking water sector

Through Synductis, a significant proportion of construction sites are carried out in synergy with other utility companies, such as the drinking water sector. By aligning infrastructure works on the basis of a coordinated approach, there is less disruption to works, but also a faster, cheaper and more ecological service. Not only is the timing of works better coordinated, but also certain purchases are made jointly, after which the costs are shared. Earthmoving is an example of this, as a trench only has to be dug once.

In the context of climate adaptation challenges and sustainable management of the water cycle, Fluvius also encourages its clients to use alternative water sources. Through awareness campaigns and the provision of tools, we teach customers to save on tap water and encourage segregation of the wastewater disposal system in households through a premium. We also want to prevent chemically polluted wastewater from entering the sewerage systems by properly informing customers.

Like Fluvius, the drinking water industry has to install digital meters. The reading of these digital water meters is done in cooperation with Fluvius. It uses the communication networks and IT systems that receive the data from the digital water meter via Fluvius' digital electricity meter. This makes the reading of the data much more efficient.

The installation of the digital water meters is also carried out in synergy. Installing digital meters (electricity, gas and water) at the same time means less inconvenience for the customer and a smaller environmental footprint thanks to the travel saved. After a successful trial period, the installation of digital water meters has now reached cruising speed. The goal of the drinking water companies (not Fluvius) is for all Flemish households to have a digital water meter by 2030.

Three water companies (Farys, De Watergroep and Pidpa) have entered into a partnership with Fluvius. This allows them to use the contractor groups under the current Fluvius contract, which runs until the end of 2025. They will also continue to install digital water meters themselves at their customers. From 2026, Fluvius' last digital electricity and gas meters will be placed, at places where often more complex installations will have to be made within a new contractor contract. The water companies decided in 2024 not to sign up and to install digital water meters themselves from 2026.

## Vision on water in future-oriented buildings

In order to shape the sustainability of buildings, Fluvius uses the Sustainability Meter and the GRO method of the Flemish government. GRO is a tool that addresses the issue of sustainability and sustainable construction through both quantitative and qualitative criteria, grouped into the following four areas: people, planet, profit and location. Fluvius wants to build sustainable and future-oriented buildings and the Facility Management Department uses GRO as a guideline and assessment tool, not as an absolute measuring instrument.

Within the vision of sustainable and future-oriented buildings, within the 'Planet' domain, water is included in the policy through three criteria:

- Water consumption
- Water reuse
- Water disposal

Overall, the expected level of performance for these criteria is set at 'Excellent', as water is an aspect related to a core activity of Fluvius. The ambition level 'Excellent' means a very ambitious, above average but achievable score, where Fluvius really wants to stand out and be 'leader of the class'.

### Water reuse

This criterion aims to further reduce drinking water consumption by reusing rainwater and grey water. The assessment of the criterion is based on two requirements:

- **Coverage by water reuse:** The percentage of total water demand covered by water reuse. This can be either rainwater or greywater. The percentage of total water demand (sanitary, domestic, irrigation, washrooms, kitchen, etc.) covered by water reuse gives an overall indication of the reduction in drinking water consumption.
- **Effective use of available rainwater:** The percentage of the maximum available rainwater supply that is reused. Sometimes the coverage of the total water demand is low, but the available rainwater is used to the maximum.

### Drainage of water

This criterion aims to limit the volume and rate of discharge of water and to prevent water pollution. The assessment of the criterion is based on three requirements:

- **Leakage rate to the sewerage system:** The leakage flow rate is the volume of rainwater that flows from the plot to the outlet (sewer, river, water plane, lower collective area, etc.). The maximum leakage rate should be as low as possible.
- **Buffer or infiltration facility emptying time:** The maximum time for the infiltration facility to empty and be able to buffer a subsequent downpour should ideally not exceed 6 to 12 hours. Storage and infiltration facilities are designed to overflow once a year on average.
- **Avoid water pollution:** Facilities can prevent or at least limit water pollution during normal use. General recommendations are formulated and treatment facilities are provided during normal use.

# Actions and resources related to water (E3-2)

## Roadmap sewerage

### Investment plan sewerage

We will work to significantly increase our sewerage budget over the next decade. In 2024, a ten-year investment plan for sewerage was drawn up, allocating resources according to the achievement of the reduction targets. Up to and including 2027, 916 million euros will be invested and it is estimated that we can achieve 97% of the targets, if the conditions are met. More ambitious targets have been set for the period up to 2033, and we will continue to invest a further 771 million euros. With the added caveat of future uncertainties in meeting the conditions, this budget should allow 82% of the targets to be met. With a total investment budget of 1.69 billion euros, Fluvius is making a significant contribution to the control of water pollution in Flanders. However, despite this large amount, not all objectives will be achieved. Fluvius is therefore in constant dialogue with its stakeholders in order to prioritise these efforts and fully achieve our reduction targets.

In order to reduce investments, in addition to the development of an intelligent investment plan, efforts are being made to finance sewerage projects through subsidies from the Flemish Environmental Agency. Through the project calls they launch, local authorities and sewerage operators can apply for subsidies for the construction of municipal sewers and small-scale wastewater treatment plants. All applications are checked against a list of criteria relating to timing, asset management, sewerage costs, commitment statement and categories of projects for sewers and small-scale wastewater treatment plants.

### Sewerage action plan

We distinguish seven concrete actions that should help us to achieve the final goal, translated into four objectives, in an acceptable way. Each action in the vision on the role of sewerage in the water cycle must meet five concrete conditions:

- They must ensure the comfort of network users.
- They must be socially responsible.
- They must be environmentally justified.
- They must be financially realistic.
- They must be technically feasible.

All measures and means relate to areas with water risk and high water stress, as the entire Fluvius operating area is located in such areas.

#### Target 1: We contribute to reducing the consumption of drinking water in Flanders.

Drinking/piped water in Flanders is mainly used in households. Demand for drinking water will increase in the future due to population growth and climate change. We can curb demand by focusing on saving drinking water and by promoting the local use of water qualities other than drinking water.

#### Action 1: Optimise synergy in digital water meter installation

We support the installation of the digital water meter to enable (piped) water saving and conscious water use on a large scale. Although Fluvius does not install digital water meters itself, Fluvius is committed to enable the introduction of the digital water meter through synergy with the rollout of the digital gas and electricity meters. For water, too, a digital meter will give users more insight and possibilities. The availability of consumption data allows users to save water (and money) easily and without loss of comfort, and to adjust their consumption (per application) according to the availability of water resources.

**Action 2: We help Flemish families use alternative water sources.**

Households are the biggest consumers of tap water. However, it is not necessary to use tap water for all applications in and around the house (e.g. flushing the toilet, washing machine, watering the garden, etc.). Another source of water (e.g. rainwater) can be a perfect alternative. Fluvius therefore encourages families and local authorities to make a conscious decision to collect rainwater for later reuse or local infiltration:

- Raising awareness on rainwater use
- Bonuses for private cisterns
- Insight into water use
- Preparation of rainwater/drought plans
- Tips for building gardens and [Website Blauw Groen Vlaanderen](#)
- Research on grey water reuse

**Target 2: We commit to maximum circular use of water and reinstall the natural rainwater cycle**

Despite local public and private efforts to collect rainwater, much of it will continue to be discharged through sewers. We want to avoid discharging rainwater and wastewater into sewers and use sewer networks to make rainwater and wastewater available as a circular resource.

**Action 3: We collect as much pollution load as possible and clean up watercourses**

In response to the [European Water Framework Directive \(WFD\)](#), in which Europe aims to have clean watercourses by the end of 2027 at the latest, Fluvius is connecting as many buildings as possible to the sewerage system in Flanders. In this way, we improve the environmental quality in the street and the natural biotope in our watercourses can recover.

On the other hand, all rainwater that falls on roads and fields and does not infiltrate is drained into the sewerage system to prevent flooding. This is why new systems are usually built separately. This means that rainwater (RWA) is collected separately from dirty wastewater (DWA) and only the latter is treated intensively.

We use our expertise and knowledge of asset management to make informed decisions about the maintenance and replacement of sewer systems. The aim is to efficiently improve water quality in Flanders without losing sight of our existing facilities. We have a defined budget, capacity and subsidies (provided by the Flemish government). Fluvius has therefore made the following commitment:

- We make minimal investments to maintain and optimise the existing network.
- We give priority to projects that make the greatest contribution to achieving the objectives set by the VMM.
- We will implement sewerage projects more efficiently.

**Action 4: We buffer and infiltrate runoff rainwater and where economically feasible we enable take-up on the rainwater system**

RWA networks are designed to relieve mixed systems and discharge rainwater to the nearest watercourse in a controlled manner. Fluvius undertakes to investigate the conditions under which the full sequence of Lansink's ladder can be followed for rainwater in RWA networks (as is expected for buildings). In addition to infiltration and delayed discharge via separate and mixed networks, rainwater will first be retained for infiltration or made available locally from the RWA system to third parties for (re)use.



To achieve this, the following is needed:

1. Action plan for conversion from mixed to separate systems. Classification of the space and the areas where separate systems will/will not be installed (e.g. in rural areas, keep rainwater completely on site and build only DWA).
2. DWA systems will be further developed in new sewer construction, as a function of flood prevention and as a function of optimising the operation of existing (largely mixed) networks.
3. Creation and organisation of branch points at retention basins and buffers in the RWA network

In this way, we will increase the proportion of households and industry using multiple qualities of water and contribute to the objective of reducing the use of piped water.

Regarding point 3 of this action, the use of rainwater as a source of raw water may not be economically viable – given the volume of rainwater that needs to be buffered over a long period of time. Therefore, it seems much more sensible to focus on rainwater reuse on private properties or through local tapping points to local buffers (possibly through district systems) and infiltration to feed the shallow groundwater layers, thus restoring the ecological added value of rainwater.

#### Action 5: We commit to the recovery of discharged water

A total of 845 million m<sup>3</sup>/year WWTP<sup>1</sup> effluent (310 million m<sup>3</sup>/year rainwater runoff (RWA), 260 million m<sup>3</sup>/year wastewater (DWA) and 260 million m<sup>3</sup>/year parasitic groundwater inflow) is discharged through the sewerage system. This water is treated so that it can be discharged into watercourses.

The 260 million m<sup>3</sup> of wastewater from households is available all year round at a fairly constant temperature and therefore has an advantage over rainwater, which only becomes available after a rainfall and needs to be buffered. By reusing wastewater in a circular manner, a new, continuous, renewable and circular source of raw water becomes available.

For example, a quarter of this 0.7 million m<sup>3</sup>/d WWTP wastewater can, if treated and without buffering, meet 40% of the daily raw water shortage by 2070. To achieve this, the water chain must be closed at a supramunicipal level. At first glance, this appears to be an efficient way of (partially) meeting the raw water shortage.

Calculation of the above example:

- 25% of 0.7 million m<sup>3</sup>/d = 0.2 million m<sup>3</sup>/d WWTP wastewater

<sup>1</sup> WWTP = wastewater treatment plant

<sup>2</sup> VRAG = reactive consideration framework for priority water use during water scarcity, see this link

- 40% of 0.5 million m<sup>3</sup>/d = 0.2 million m<sup>3</sup>/d Raw water deficit

A nuance here is that there may be locations where WWTP flow rate contributes significantly to low water flows in the watercourse during dry summers. For these ecologically sensitive watercourses, continuous reuse of WWTP effluent could be a problem. It will be less easy to use WWTP effluent as a continuous source in summer.

Flemish industry currently consumes about 90 million m<sup>3</sup>/year of drinking water, 160 million m<sup>3</sup>/year of surface water (net consumption excluding cooling water and other discharges), 55 million m<sup>3</sup>/year of groundwater, 80 million m<sup>3</sup>/year of reused wastewater and 25 million m<sup>3</sup>/year of rainwater (VRAG<sup>2</sup>, 2021). This results in a total wastewater volume of >400 million m<sup>3</sup>. 90 million m<sup>3</sup> of tap water is a quarter of the total industrial wastewater of 0.2 million m<sup>3</sup>/day.

Industrial effluent has not been included in the above calculation. On the one hand, a further 40% of the raw water deficit in 2050 can be covered by upgrading industrial effluent from piped water. On the other hand, it is also important to close the water cycle for industrial applications (per source) and to recycle industrial raw water sources from wastewater. The Blue Deal is making a major effort to achieve this.

#### Target 3: We make sewerage networks future-proof

We will develop the future RWA network from an underground network for infiltration and runoff to an active network that collects rainwater in buffers, drains it with a delay, allows it to infiltrate and keeps it up to date. We want to expand and develop the DWA network, so that all pollutant loads are connected and treated – see target 2. We also use our expertise and knowledge of asset management to manage the sewerage networks effectively and efficiently.

#### Action 6: We digitise and automate sewerage networks

Sewerage works are expensive, time-consuming and cause a lot of inconvenience. Therefore, we want to make maximum use of the underground capacity in the sewerage network and thus avoid reinforcing the network (larger diameters) as a result of climate change. In addition, we can also use the available buffering (if we use it intelligently) to make water available again. Smart handling (steering) is needed because the buffer needs to be empty to avoid flooding and also full so that the buffered water can be used as a resource.

So we will monitor the sewerage network (inflows, outflows, levels of buffers and storage, etc.), but also use other data inputs (e.g. weather forecasts, local rainfall models, etc.) to determine investments and direct buffers.

#### Target 4: We make sewerage system information available to system users

Today, our sewerage networks are designed with a margin of capacity to absorb peak rainfall events and avoid flooding. Although the passive margin for water discharge in sewer design is quite large, it will be used more quickly in the future due to the increased peak intensity of rainfall. The sewerage system is a link in the integral water chain for (the disposal of) rainwater. Making information from this system available to all users and links in the water chain can help to reduce the accidental overloading of the system due to climate change.

#### Action 7: We prepare for alternative solutions that help avoid overloading the sewerage system and its consequences

The cost of the sewerage system is mainly determined by the peak capacity of the rainwater. The local collection and infiltration of rainwater will have an impact on the amount of rainwater that needs to be disposed of (during a peak rainfall event) and thus on the price and dimensions of the sewerage system.

We expect that a more variable load on the sewerage networks and the additional target of keeping up with the water to be discharged for as long and as much as possible will in the future lead to a need for more signalling capabilities to facilitate and control the use of the sewerage buffers (=digitisation and automation of the networks).

In addition, we want to make all known information about the status of the sewerage network and buffers available to users of the system, partners before and after us in the chain, and possibly third parties. The information we share proactively helps us to

- Anticipate the impact of storms on the load of the system (e.g. draining private/public buffers in advance to catch a storm and not overload the system, interaction with watercourses,...) together.
- Mitigating the possible negative effects of the storm and the fact that the rainwater is kept locally as much as possible (e.g. warning the inhabitants of streets that are subject to controlled flooding in a rainwater plan,...)

## Synergy with drinking water industry

Cooperation with utility companies, including those in the drinking water sector, through Synductis bears fruit every year. The Synductis annual report highlights key events, projects and progress in systems and tools for synergy, including those in synergy with the drinking water sector. It also looks ahead to the coming year with key plans for further collaboration.

The installation of the digital water meter by the drinking water companies in cooperation with Fluvius continued in 2024 and is reaching cruising speed.

## Targets related to water [E3-3]

### Targets sewerage

Europe has required member states to have clean watercourses/bodies by 2027 and has formulated this objective in the [Water Framework Directive](#). In Flanders, the European Framework Directive has been translated by the Vlaamse Milieu Maatschappij (VMM - Flemish Environment Agency) into the [Decree on Integrated Water Policy](#). The VMM has drawn up a proposal per party, per municipality and per water body to achieve the water quality objectives described in concrete terms. At Fluvius, these European targets are called '**reduction targets**'. They determine the sewerage rate that we have to achieve within a given timeframe.

Compared to the situation in 2017, we need to reduce the pollutant load discharged into the watercourse by a certain number of (existing) residents. These targets are based on the assumption that no possible additional development will increase the pollution load. In addition, the **treatment rate<sup>1</sup> must be at least 50% by 2027** for each municipality. This is not yet the case for all the municipalities that have entrusted their sewerage management to Fluvius. In 2024, € 150,185,080.53 will be invested in the sewerage networks, in accordance with the EU taxonomy.

In order to qualify for subsidies for sewerage projects, cities and municipalities must have a rainwater and drought plan in place by 1 January 2025. Fluvius has therefore set itself the target of ensuring that **100%** of the municipalities where Fluvius is the sewerage manager have a **rainwater and drought plan** in place by 1 January 2025<sup>2</sup>. By the end of 2024, we had effectively achieved this goal.

### Drinking water industry cooperation targets

The various collaborations with the drinking water sector offer Fluvius synergy benefits. We naturally want to maximise this opportunity to ensure less inconvenience for customers and a smaller ecological footprint. However, the timely installation of the digital water meter in all Flemish households by 2030 is a target for the drinking water companies, not for Fluvius.

<sup>1</sup> The treatment rate is the ratio of the total number of inhabitants connected to a waste water treatment plant (WWTP) to the total number of inhabitants in the municipality.

<sup>2</sup> It is not mandatory for every municipality to have a rainwater and drought plan, but it is highly recommended given the impact on project financing. Fluvius voluntarily commits to this target in order to reduce the financing risk for municipalities.

<sup>3</sup> The stated ambitions are not a legal obligation, but a voluntary commitment by Fluvius.

<sup>4</sup> Litres per second per hectare

### Ambitions water in future-oriented buildings

As mentioned in the [Vision on water in future-oriented buildings](#), within the 'Planet' dimension, the topic of 'Water' is included in the policy through three criteria:

- Water consumption
- Water reuse
- Water drainage

In general, the expected performance level for these criteria is set at 'Excellent', as water is an aspect related to a core activity of Fluvius. The ambition level "Excellent" means a very ambitious, above average but achievable score, where Fluvius really wants to stand out and be 'leader of the class'<sup>3</sup>.

For each criterion, specific targets are set where relevant:

- Water consumption: A good design will limit the length of pipework between hot water preparation and the tap point to a maximum of 12 metres.
- Water reuse: At least half of the total water demand will be met by water reuse. At least 90% of the maximum available rainwater is reused.
- Water drainage: The leakage rate is less than 1 l/s/ha<sup>4</sup>. Buffers and infiltration facilities have an emptying time of less than 6 hours.

## Water consumption [E3-4]

The table below gives an overview of the water consumption of Fluvius' own operations. It should be noted that the entire operating area of Fluvius (Flanders) is located in an area of water risk and high water stress. Furthermore, Fluvius has no water-intensive production activities. The figures include drinking water and rainwater consumption and storage in (non-)grid-bound buildings. Water flows within the wastewater activity are not included here, as we only transport these wastewater flows to the supramunicipal wastewater system and do not consume them for our own activities.

Indicator	Value
Total water consumption in m <sup>3</sup>	23,077
Total water consumption in m <sup>3</sup> in areas at water risk, including areas of high-water stress	23,077
Total water recycled and reused in m <sup>3</sup>	2,362
Total water stored in m <sup>3</sup>	350
Total changes in water storage in m <sup>3</sup>	-
Water intensity: total water consumption in own activities in m <sup>3</sup> per million euros net revenue	0

The quantitative data are based on the 2023 levy figures. These are derived from water meter data, billing data, apportionment data, etc. For drinking water consumption points where metering is not available (e.g. in rented office buildings), an extrapolation has been made based on the occupancy rate and number of employees working in these buildings.





# Resource use and circular economy (E5)

The construction of our multi-utility networks (grid-bound) and the operational needs of supporting services (non-grid-bound) require a large inflow of materials and inevitably generate a significant volume of waste. A more circular approach to Fluvius' material use can therefore provide opportunities and reduce negative impacts. In 2024, we developed a policy, identified levers and carried out baseline measurements. In the coming years, we will continue to work on setting targets and building on existing measures.

### IRO description

Use of new raw materials and limited use of recycled materials as raw materials and limited use of circular processes

### IRO type

Impact negative

Waste within operations and value chain and limited circular use of materials taken out of service by Fluvius.

Impact negative

**56,037**

Total material inflow (tonnes)

**64.9%**

Percentage of waste diverted from disposal

**3.1%**

Percentage of waste not recycled

## Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities [E5.IRO-1]

Construction and managing infrastructure is one of Fluvius' main activities. This involves the extensive use of materials, albeit with a long service life. Fluvius is aware of the impact and potential opportunities offered by circular models, and the possibilities are continuously explored within the technical and legal framework. Together with suppliers, contractors and service providers, the impact of current material use and circularity is identified and, where possible, action is taken to make improvements. Fluvius wants to use its scale as a lever to explore and accelerate the circular possibilities of material use within Flanders, partly through cooperation with other customers within and outside Flanders.

The double materiality analysis identified impacts, risks and opportunities along the entire value chain in terms of material use and circular economy. Material IROs were identified through interviews with stakeholders in this value chain.

## Policies related to resource use and circular economy (E5-1)

In a circular economy, the aim is to use fewer and fewer materials by keeping them in the material cycle for as long as possible. In 2024, Fluvius developed a strategy to integrate circularity into the company's use of materials. We have defined three pillars that cover the entire life cycle of materials:

1. **Inflow reduction:** reducing the amount of new raw materials used in materials purchased in relation to Fluvius' activities (expressed in tonnes and as a proportion of the weight of non-primary materials in relation to the total weight of materials used).
2. **Maximising service life:** extending the lifespan of materials, maintaining the function of materials with their value for as long as possible within or outside Fluvius (expressed in years).
3. **Material conservation:** maximising the reusability of raw materials from materials inside or outside Fluvius (expressed in tonnes and the proportion of reusable raw materials compared to the total amount of materials used).

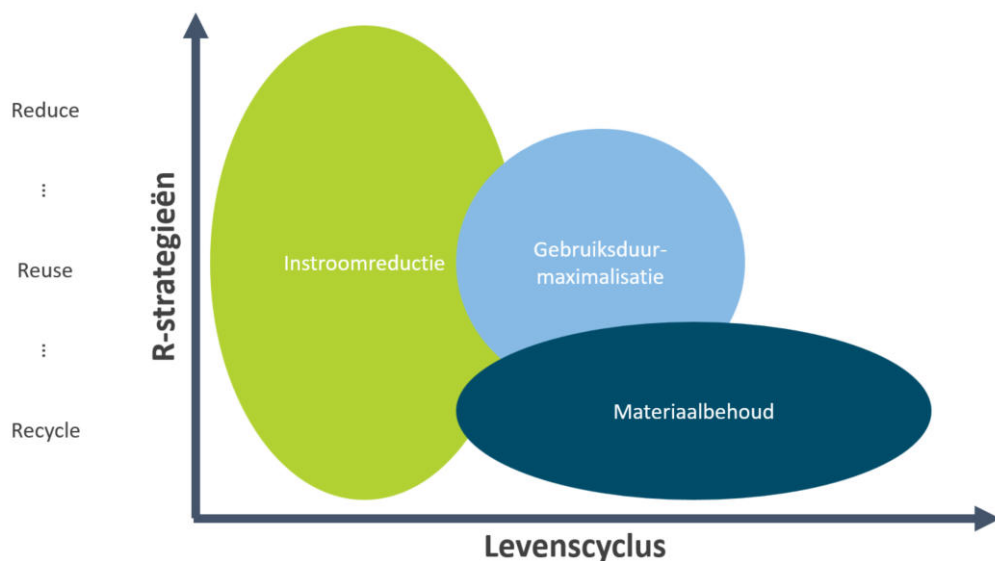
By applying the various circular strategies within these three pillars, significant negative impacts can be identified, assessed, controlled and remediated. The circular strategies come from the R ladder. The higher the strategy on the ladder, the more materials are saved and the more waste is avoided rather than having to be disposed of at the end of its lifespan. The higher a strategy is on the R ladder, the more circular it is.

This policy is therefore a concrete response to the negative impacts identified in the double materiality analysis:

- Use of virgin raw materials and limited use of recycled materials as raw materials and limited use of circular processes
- Waste within operations and the value chain and limited circular use of materials decommissioned by Fluvius.

Fluvius also monitors innovations in materials and processes. We monitor the different technology areas, the impact of the technology, the expected period of use of the technology and an estimate of the effort required to implement the technology.

The material use and recycling policy is promoted within the Network Management Department.



## Actions and resources related to resource use and circular economy [E5-2]

**Fluvius is taking several measures in the area of material use and recycling. Levers have been identified on which Fluvius can act within its own activities and the value chain. The measures always fall within these levers and contribute to the three pillars mentioned above: reducing inflow, maximising service life and material conservation.**

### Levers for circularity

#### Knowledge

By documenting digital data on material inflow and collecting data, we are assembling a knowledge base on our material use. We can use this knowledge to manage assets and improve process efficiency.

New legislative initiatives increasingly require material suppliers to report transparently on their material use in the products they supply. We want to capture as much of this information as possible.

Possessing knowledge is seen as a lever for raising awareness, both internally and externally. For Fluvius, the collected knowledge creates a variety of insights from which further actions can be taken with the right priority to achieve the set goals. For suppliers and contractors, providing information becomes a must to meet their customers' needs and can be a competitive advantage to commit to circular material use.

#### Efficiency gains as a function of material requirements

The organisation of Fluvius' processes largely determines the need for materials. By making these processes as efficient as possible, it is possible to reduce the use of materials. One of the most important measures is the intelligent management of our networks. By targeting expansion and focusing on flexibility, we can facilitate efficient network utilisation and avoid unnecessary investment. This is not only a material saving, but also a cost saving for Fluvius and its customers. Efficient logistics organisation, cooperation and good inventory management also contribute to these savings.

#### Circular policy principles

When designing our networks, we consider the entire life cycle of materials. Policies and design guidelines not only take into account technical requirements, but also respond to opportunities such as modular design, standardisation, new applications, future-oriented design, ... within the context and material flows of Fluvius. The R-strategies can also serve as inspiration.

#### Procurement requirements

As a major purchaser of materials, Fluvius has some influence over suppliers and contractors. We can encourage them to continue innovative developments towards a circular economy. In addition, we can include certain selection and award criteria in our procurement documents in function of a circular design of materials (material inflow, lifespan and potential for material conservation). Moreover, in the way we tender, we can also put more responsibilities for the materials used on the supplier or contractor, such as extended warranty clauses or mandatory take-back of packaging or residual lengths.

The financial model of leasing offers Fluvius the potential to place more responsibility for material use on the value chain. The possibility of extending the duration of existing leases should be further explored. New leases for (non-)grid-bound materials could also be explored.

## Circular management of materials

Once a material has been purchased by Fluvius and installed as part of our networks, the circular management of the materials present is an essential link in our contribution to the circular economy. By focusing on intelligent maintenance and replacement as a function of maximising service life and sustainable asset management, materials are retained in their function, application and value for as long as possible.

When materials are taken out of service and/or can no longer be used in their original function, they can, on the one hand, be given a new function, which may have been defined in the circular policy principles or technical specifications. On the other hand, research can be initiated to assign new functions to materials, their components or raw materials recovered from the material. This is an important issue in the context of the energy transition, in view of the sanitation and reinforcement of energy networks. In this context, Fluvius, the municipalities and the road authorities always strive to reduce the total social cost of the works, an economic optimum. An ecological optimum is also taken into account in the context of materials recycling. Fluvius will be further investigating this in the coming years.

## Ongoing measures

### Reuse of transformers

The energy transition is causing a shortage and long delivery times of transformers. We are responding flexibly to this challenge by reusing transformers that can be optimised for their new destination after a thorough inspection. Transformer reuse is an implemented measure that will be further expanded in the coming years as the energy transition progresses.

### Recovery of components from fixtures and pavement boxes

As part of the LED conversion, many old fixtures are dismantled in order to recycle them as efficiently as possible. We also process old pavement boxes in this way. This is done by a specialist company that sorts out the material streams into metal, copper, plastic and electrical parts. This measure has been in place for a number of years and, as the LED conversion progresses, is having an increasingly positive impact on Fluvius' circular material use.

## Digital meters refurbished

From 2025, Fluvius will collect digital electricity meters that are still usable and reinstall them after a thorough check. In this way, we avoid throwing away devices that are still in perfect working order. The meters come from temporary construction site connections, for example, or from customers who upgrade their connection. With this project, we want to put these meters back into circulation - at no cost. Initially, we will be able to recover around 2,000 to 3,000 meters per year. Vlotter, a social employment company from Boom, has been commissioned to 'refurbish' all the meters. They carry out a complete check and then repackage the meter. An important note: the meter reading does not return to zero, so good registration and clear information for the customer are crucial. Our customer website has been adapted accordingly and we also provide a flyer that is included in the box of each refurbished meter. This way, all the technicians involved can immediately see which meter it is and we can inform our customers correctly. We expect to start installing the first meters in early 2025.

## Prioritisation of new measures

In addition to the ongoing measures, a lot of new initiatives are of course possible. Creating a framework for prioritising these measures according to their impact on circularity and other areas is an exercise that will be carried out in 2025. We are also investigating whether circularity can be integrated into Fluvius' asset management policy.



## Targets related to resource use and circular economy [E5-3]

To measure circularity within Fluvius, targets will be formulated for each of the three pillars of the material use and circularity policy. These will be defined along two dimensions. On the one hand, the purchase of new (non-)grid-bound materials and, on the other hand, the management of existing materials in the multi-utility networks. One indicator that can be used for this is the Circular Material Use Rate (CMUR). This indicator is defined as the ratio of circular material use (U) to total material use (M):

$$\text{CMUR} = \text{U/M}$$

Fluvius has focused on conducting a baseline measurement in 2024 and will set specific targets for these material use and circular economy dimensions in 2025. These targets will relate directly to material inputs and material outputs, including waste, services and materials:

- The increase in circular product design: the 'Material Conservation' pillar responds to the recyclability of materials.
- Increasing the share of circular material use: there are specific targets for the CMUR indicator.
- Minimising the use of primary raw materials: the 'Inflow Reduction' pillar focuses on reducing the use of materials and the proportion of materials that are given a second life.
- Sustainable procurement and sustainable use (following the cascade principle) of renewable raw materials: the objectives are divided into two dimensions, with sustainable procurement on the one hand, and exploiting opportunities in materials in use on the other.
- Waste management, including preparation for proper disposal: waste management is addressed in the 'Material Conservation' pillar, and is further detailed in the section [Resource outflows \[E5-5\]](#).

All targets are set voluntarily at company level. In Flanders, general targets for circularity of 30% by 2030 and 100% by 2050 are also set, but these are not mandatory for each company to adopt immediately.

## Resource inflows (E5-4)

The construction and operation of our networks requires large quantities of materials, which must also meet the quality requirements necessary to provide a reliable network for our customers and to achieve a maximum lifespan of assets. We divide inflow materials into two categories: grid-bound and non-grid-bound materials. Non-grid-bound materials are used in supporting services, such as IT equipment, office equipment and buildings, vehicles, workwear and protective equipment, etc. For grid-bound materials, a further distinction can be made according to the utility network.

Utility network	Grid-bound materials
Electricity	Cables, switchgear, transformers, cabins, meters, protective devices, digital components, ...
Gas	Pipes, cabins, meters, monitoring, ...
Public lighting	Poles, fixtures, digital components, ...
Sewerage	Sewer pipes, pump systems, digital components
Heat	Piping, insulation material, transfer stations, digital components, ...

Purchased materials do not include material amounts of biological materials due to the nature of these material inflows. In addition, no information is available on the proportion of secondary reused or recycled materials in the total material inflow. Furthermore, there is no evidence to suggest that this proportion would be significant. The use of assumptions to determine this share was investigated, but no suitable source data were found that would allow assumptions to be made with sufficient accuracy. Fluvius mainly takes measures to maximise the service life of materials, to use materials optimally and to keep them as long as possible. However, no overarching indicators have yet been established.

Resource inflows	Value
The overall total weight of products and technical and biological materials used during the reporting period (tonnes)	56,037
The percentage of biological materials (and biofuels used for non-energy purposes) used to manufacture the undertaking's products and services (including packaging) that is sustainably sourced	0%
The weight of secondary reused or recycled components, secondary intermediary products and secondary materials used to manufacture the undertaking's products and services (including packaging) (tonnes)	0
Percentage of secondary reused or recycled components, secondary intermediary products and secondary materials	0%

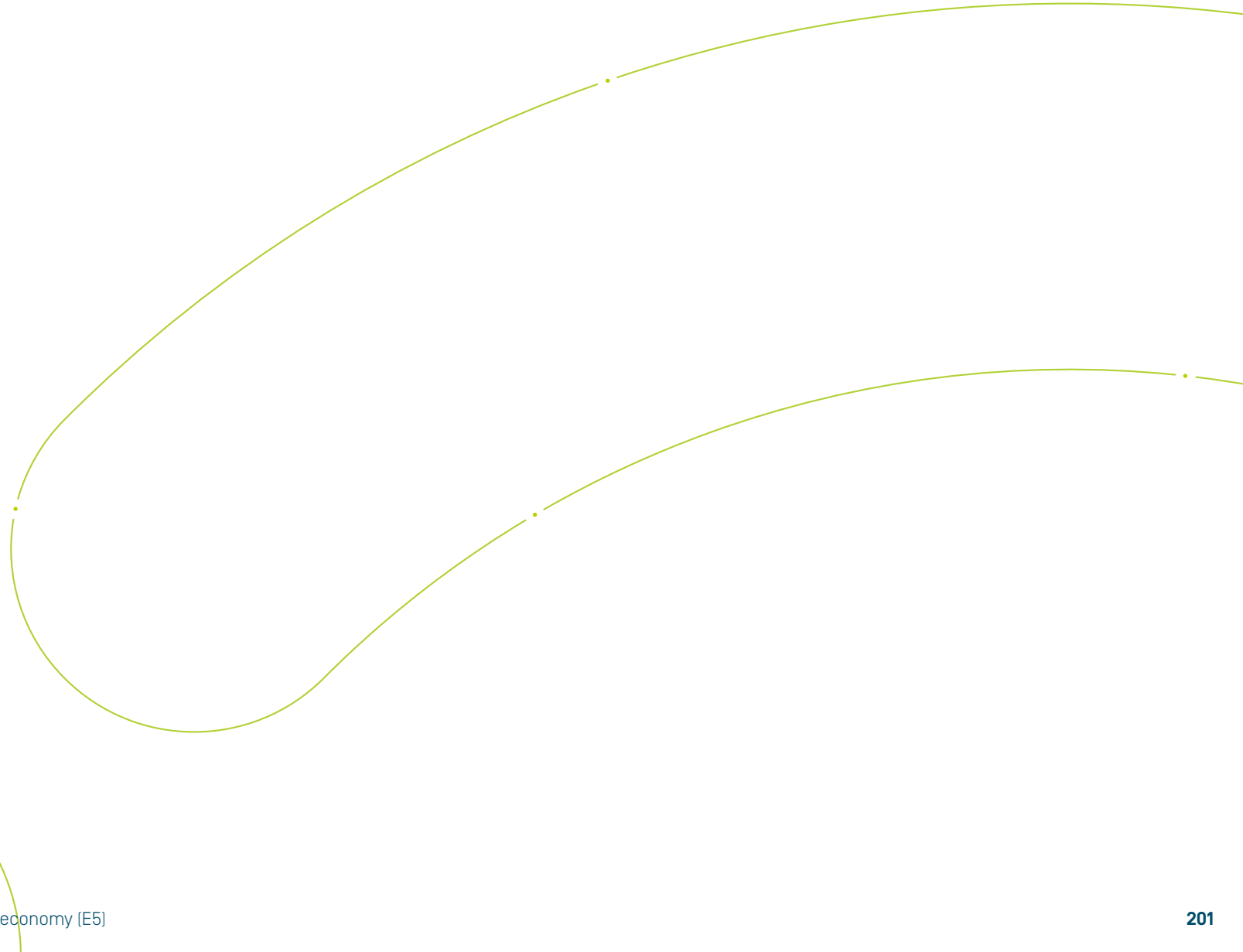
The indicator for the total weight of materials used during the reporting period was compiled from financial (accounting) data to be consistent with the scope of the IFRS report. From these data, all material purchases, grid-bound and non-grid-bound, were filtered out, and services were excluded. By using financial procurement data, the most accurate scope is used to calculate the new material inflow and avoid double counting.

The conversion of financial data into weights was done using the available weight data per item. For data where weights were not available or the quality of the source data was insufficient, average weights per product group were used or an extrapolation was made based on the total material mix.

As the materials for the sewerage and heat activities are not purchased by Fluvius, but by the contractor in the value chain who installs the materials, and as a material IRO is linked to the material input, it was investigated how this material inflow could be taken into account. A significant amount of material (in tonnes) is expected to be used within these activities. However, we do not currently have sufficient data on weight and (despite reasonable efforts) cannot make a sufficiently accurate estimate (that meets the qualitative characteristics of information (ESRS 1 Section 2. and Annex B)). Therefore, we invoke the 'transitional provision' for value chain information mentioned in ESRS 1 10.2.



To gain more insight into material flows within Fluvius, the possibility of material passports is being investigated. In 2025, data will be requested from suppliers for some key product groups. This will be systematically expanded to map the main product groups and monitor material use and circular economy measures.



## Resource outflows [E5-5]

### Products and materials

As discussed in the [Policies related to resource use and circular economy \(E5-1\)](#), Fluvius aims to contribute to the circular economy by helping to integrate circular economy principles into the products and materials we use in our networks and return to circulation after primary use. In the applicable procurement procedures, circularity and related targets are taken into account according to agreed ambition levels based on prior market research. This is reflected in the exclusion criteria, selection criteria, technical requirements, performance conditions and award criteria.

As a multi-utility company, we are focused on circular services in our business activities. For example, we close the water cycle in our sewerage activities, and we offer 'light as a service' financing for public lighting.

By focusing on maximising the useful life of materials and sustainable asset management, the sustainability of the networks Fluvius builds and manages is rated highly. The reparability of these networks is very high, given the many years of technical expertise in operating them. As a function of network reliability, rapid repair of defects is crucial.

### Waste [products]

#### Policy

With regard to waste reduction, Fluvius is committed to the three pillars mentioned above: inflow reduction, maximising service life and material conservation with the corresponding R-strategies. By simultaneously applying and embedding these circular principles in our waste management, we believe that maximum waste reduction can be achieved.

Waste is managed within our own operations and in collaboration with our waste management partner. Waste management includes:

- Sorting of waste
- Collecting waste materials
- Providing the necessary containers for waste materials
- Temporary storage of waste materials
- Handling of waste materials
- The transport of waste
- The recovery of waste
- The disposal of waste

including the supervision of those operations and including activities of waste dealers or brokers.

Fluvius complies with the Flemish waste legislation VLAREMA for the selective collection of waste. For this purpose, we have concluded a contract with a recognised collector, waste dealer or broker (IHM). An exception is made for waste that is owned by a leasing or rental company, or for waste that is covered by specific sectoral agreements.

Waste generated by contractors during work carried out on behalf of Fluvius is managed in two different ways, depending on the situation:

- Fluvius-owned waste: this must be selectively collected by the contractor in a waste container under contract with the Fluvius waste management company (IHM).
- Contractor-owned waste: must be processed under the contractor's management.

Transport between the site and the nearest waste collection point should always comply with general and specific transport conditions.

In all office buildings, the necessary receptacles and awareness are provided to enable employees to dispose of waste easily and selectively. Employees are informed in due course of any changes, such as new waste streams to be sorted, new locations, methods, etc. They are also informed of elements that are not going well, such as incidents, non-conformities, poor sorting levels, etc. In the event of incidents, specific procedures have been put in place to carry out interventions with approved companies to remove contamination on site.

Further treatment of all waste streams is always carried out by the appointed partner. As part of the recycling strategy, contractors may also be used to dismantle waste or materials. They must also have the necessary waste treatment permits.

## Metrics

Throughout the waste management process, the necessary certificates and waste records are kept for tracking and reporting in the integrated annual environmental report. This also provides maximum insight into the material flows handled and the monitoring of targets.

Waste stream	Weight [tonnes]		
	Non-hazardous waste	Hazardous waste	Total
Preparation for reuse	30.3	0.6	30.8
Recycling	2,012.5	353.9	2,366.4
Other recovery operations	0.0	42.4	42.4
<b>Total amount of weight diverted from disposal</b>	<b>2,042.7</b>	<b>396.8</b>	<b>2,439.6</b>
Incineration	1,183.4	21.5	1,204.9
Landfill	1.0	113.3	114.3
Other disposal operations	0.0	0.8	0.8
<b>Total amount of weight directed to disposal</b>	<b>1,184.4</b>	<b>135.5</b>	<b>1,320.0</b>
<b>Total amount of weight</b>	<b>3,227.2</b>	<b>532.4</b>	<b>3,759.5</b>
Total amount of weight of non-recycled waste			115.1
Percentage of non-recycled waste			3.1%
Percentage of waste diverted from disposal			64.9%
Total amount of radioactive waste			0.0

Environmental information (E)

These data comes from our authorised waste collector, waste dealer or broker (IHM) and cover all waste streams as defined by VLAREMA legislation. The quality of the data is considered to be high as the sources are largely direct measurements. For the subsidiary De Stroomlijn, details of the different waste streams are not available due to the service nature of their activities. In addition, their offices are often rented, with the building owner providing waste management for the entire building. Fluvius' share of the waste streams from the Synductis construction sites is assumed to be included in the Fluvius waste figures, as the waste management processes at these sites are designed to do so. Waste generated by contractors is not included in the scope as this has always been the contractors' responsibility under the contracts, so the material has never 'entered' Fluvius. In addition, earthworks are not included as they are not covered by the VLAREMA legislation, and were initially also not considered as a resource inflow or use.

The waste streams collected by Fluvius for treatment can be divided into the following categories according to the European Waste Catalogue (EWC):

EWC code	Category	Present materials
02	Waste from agriculture, horticulture, aquaculture, forestry, hunting and fishing and food preparation and processing	Food waste
03	Waste from wood processing and the production of panels and furniture as well as pulp, paper and cardboard	(Un)treated wood
04	Waste from petroleum refining, natural gas purification and pyrolytic treatment of coal	Bitumen
06	Waste from inorganic chemical processes	Mercury
07	Waste from organic chemical processes	Hard and soft plastics
08	Waste from manufacture, formulation, supply and use (MFSU) of coatings (paints, varnishes and enamels), adhesives, sealants and printing inks	Resins, toners, paints, varnishes, glues
12	Wastes from shaping and physical and mechanical surface treatment of metals and plastics	Pure and mixed metals
13	Oil waste and liquid fuel wastes (excluding edible oils, 05 and 12)	Waste oil and PCB-containing oil, mainly from transformers; fuel oil residues

EWC code	Category	Present materials
15	Packaging waste; absorbents, cleaning cloths, filter materials and protective clothing (not otherwise specified)	Absorbents, contaminated clearance waste, empty packaging, lashing straps, wood, paper and cardboard, PMD, glass, ...
16	Waste not mentioned elsewhere in the list	Grid-bound components such as transformers, switchgear, (mixed) metals, cables, electronic equipment, batteries, ...  Non-grid-bound components such as mixed (S)HW, lab waste, gas bottles, aerosols, glass, ...
17	Construction and demolition waste (including excavated soil from contaminated sites)	Cables, materials containing or suspected of containing asbestos, analogue electricity and gas meters, (mixed) plastics, (mixed) metals, wood, glass, general construction and demolition waste such as rubble, ...
19	Wastes from waste management facilities, off-site wastewater treatment plants and the production of water intended for human consumption and water for industrial use	In 2024, some waste streams were incorrectly allocated to this category. In principle, Fluvius has no waste in this category.
20	Municipal waste (household waste and similar commercial, industrial and institutional waste) including separately collected fractions	(Mixed) metals, (mixed) plastics, electronic equipment, industrial waste, residual waste, high-calorific waste, prunings and green waste

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# Own workforce [S1]

Our ambition for our own employees is clear, we want to be a Great Place To Work and therefore put our employees at the centre of our Fluvius culture based on shared leadership and trust.

IRO description	IRO type
Impact on employee job satisfaction by providing a caring climate, creating a fair and just climate, assigning responsibility to employees, and enabling them to contribute to a socially relevant mission	Impact positive
Impact on employees' quality of life through working environment and employment terms (safety, benefits and employment conditions, ...)	Impact positive
Strong social consultation structure	Impact positive
Negative effect on physical health due to harsh or dangerous working conditions	Impact negative
Reduced job satisfaction (e.g. as a result of unfair promotions, political games, sentiment that others are favoured, involvement in decisions that affect the work environment, etc.)	Impact negative
Mismatch of available and required competencies and skills and insufficient availability of qualified personnel	Risk

**5,863**  
Number of employees Fluvius SO & Fluvius OV

**374**  
Number of employees De Stroomlijn

**77%**  
Great Place To Work score Fluvius SO & Fluvius OV

**5.88%**  
Absenteeism rate Fluvius SO & Fluvius OV

**57.4**  
Average number of training hours Fluvius SO, Fluvius OV & De Stroomlijn

## Interests and views of stakeholders [S1.SBM-2]

As discussed in [SBM-2](#), employees have been identified as internal key stakeholders. They are represented by workers' organisations. Moreover, Fluvius explicitly sets the 'Employee centric' pillar within its strategy. The employee is involved in this process and the interests and everyone's points of view are taken into account in the development of Fluvius' HR policy.



# Material impacts, risks and opportunities and their interaction with strategy and business model [S1.SBM-3]

## Material impacts, risks and opportunities

The material impact on own employees as identified in [IR0-1](#) is included within the strategic pillar 'Employee centric'. By defining strategic engagements, we can adjust the policy under this pillar based on the identified impact.

Within this report, all own employees who could experience material impact, are included in the scope. This concerns employees of Fluvius System Operator, Fluvius OV and De Stroomlijn.

The material negative impacts are widespread on the one hand and related to individual incidents on the other. For instance, there is a possible negative impact on job satisfaction as a result of, for example, unfair promotions, political games, sentiment that others are favoured, involvement in decisions that affect the work environment, etc. This impact is evident from the Great Place To Work survey, which was conducted representative of all its own employees. In addition, there are potential negative effects on the physical health of own employees as a result of harsh or dangerous working conditions. Given the technical environment in which Fluvius operates, such a negative impact in terms of safety is present and manifests itself in the event of incidents.

The material positive impact is present for all groups of own employees and can be related to the societal relevance of the activities carried out by Fluvius. For example, there is a positive impact on job satisfaction by providing a caring climate, creating a fair and just climate, assigning responsibility to employees and making it possible to contribute to a socially relevant mission. In addition, Fluvius also creates a positive impact on the quality of life of its own employees through the working environment and the terms of employment in areas such as safety, benefits and working conditions. This impact is also evident from the Great Place To Work survey, which was conducted representative of all its own employees. In addition, Fluvius also has a strong social consultation structure that contributes to the positive impact on the entire personnel.

There is a link between material risks (and opportunities) and the dependence on one's own staff. This is mainly the case in the context of the risk of a mismatch between available and required competences and skills and the insufficient availability of qualified personnel. After all, without sufficient talent with the right skills, there is no successful energy transition. Mainly technical profiles are needed to achieve the objectives for the energy transition and climate adaptation. That is why Fluvius is actively committed to training and competency management. Employees who carry out work onsite, are the most susceptible to safety risks. The prevention service screens all job descriptions of employees to identify the appropriate risks and to map out training paths. These analyses are validated by the Qualification Committee.

Within Fluvius' activities and business model, there are no significant risks of incidents of forced, compulsory or child labour for its own employees, neither in terms of the type of activities, nor on the basis of countries or geographical areas with potentially risk-sensitive activities.

## Interaction with the strategy and the business model

### Impact of the energy and climate transition plans

Realising the energy transition and climate adaptation entails many challenges, including in terms of our own staff. We continue to grow and therefore the HR contributions must also evolve. These are impacted in different ways:

- Volume-driven impact (recruitment/training/administration for new employees/...)
- Function-driven impact (new functions / reworked functions)
- Competency-driven impact (new/other competencies, short and long term)

In the short term, the action plan within Fluvius to be able to realise the energy transition and climate adaptation will have a lot of volume-driven impact. This ranges from recruitment, training, but also administrative support for all these new employees, to the correct mapping of business needs,...

Furthermore, we increasingly hear the need from the business for more agility and flexibility regarding the deployment of employees. Starting from a concrete definition of that need, we will look for solutions together. We define the following actions:

- Scoping/definition of agility
- Future vision function (classification system) non-executives/operation LPG/OV-Hudson

Among other things, the energy and climate transition plan, but also other triggers such as changes in the business model, can lead to a change in the workforce. To prepare for the future, we rely on Strategic Workforce Management, with the following actions:

- Translating strategy changes into the impact on competencies
- Anticipating changing competence needs
- Analysis of the training offer and methodology determine training/priorities per region of Fluvius...

### Impact of the transition to Wyre

In addition, in 2023, Fluvius' fibre activities were transferred to Wyre, the new infrastructure company of Fluvius and Telenet. The employees active in this activity had to be redeployed, with Fluvius having the clear ambition to keep everyone on board. We strived for the best possible solution for all parties in the reorientation of all fibre employees. As mentioned earlier, Fluvius is looking for a lot of personnel to realize the energy and climate transition. In combination with the tight labour market, it is a win-win to use this target group to ensure that the transition runs smoothly and then proactively reorient it within the other activities. To this end, a transition plan has been developed and resources have been made available to provide guidance and follow-up for managers and employees.



## Policies related to own workforce [S1-1]

**The policy to manage material impacts, risks and opportunities on own employees is based on a clearly defined HR strategy that takes into account current HR trends, sets ambitions and has an eye for human rights, safety, diversity and inclusion.**

### HR-trends

Socially, we are evolving in the direction of working differently with a generation of employees who have a different view on work and working relationships, with a focus on life-phase-conscious and sustainable employment, individualization, attention to self-realization and the need for a new kind of leadership. Customers, as well as our employees, are becoming more demanding and assertive. We are also increasingly moving in the direction of ecological and ethical entrepreneurship, in which sustainable mobility and corporate social responsibility are of paramount importance.

The energy landscape is evolving and linked to it is our raison d'être, namely:

- pressure on tariffs and required savings
- increase in productivity
- cooperation with other organizations
- diversification of the various companies in the sector
- integration of grid operators

Technological progress is accelerating and has an impact on our daily operations. We also see an evolution here:

- knowledge society
- social media
- web applications
- smart era

We are constantly confronted with a changing legal framework to which we must conform:

- (para-)fiscal legislation (pressure on alternative forms of remuneration)
- social legislation (working longer, unified status, gender neutrality, anti-discrimination legislation)
- employment law (e.g. dismissal protection, career flexibility)

The labour market is also changing and "the war for talent" or the scarcity of talent on the labour market forces us to pursue a different policy:

- lack of technical profiles
- depopulation
- ageing
- globalisation

We need to take into account sector-specific factors such as:

- positioning of the trade unions
- increasing importance of generic competences and internal career mobility
- history of the terms of employment
- the creation of new business for non-regulated activities and also the possible new forms of cooperation/companies are a challenge for our business domain
- the increasing volume of current business activities to support the entire energy transition and climate adaptation.

## The ambition of HR

### Mission

Our HR professionals create a stimulating working environment in which our employees develop to the maximum and are eager to help build the future of Fluvius.

### Vision

By 2025, all Fluvius employees will be using their talents in a sustainable way in a company on the move. Our employees are proud to be part of Fluvius and work together as a team to achieve the best possible result.

### Strategy



### What does this mean?

We are HR professionals who take care of :

- Correct, coherent and accessible HR information
- Skilled staff who know the subject matter in the complex HR world of Fluvius
- First time right (even if it sometimes takes longer)

We provide a stimulating working environment:

- Self-development is central (in terms of training / career mobility)
- Supportive leadership
- Reward tailored to people who seize the opportunities / put their shoulders to the wheel for the future of the company
- Promote flexibility (both physically, in terms of work schedules and career movement)
- Administrative relief

We ensure development:

- Guiding starters
- Training opportunities

We provide enthusiasm:

- Importance of commitment / involvement
- Pride in the job / company

We help build the future:

- Implies learning ability and willingness to change
- The right employee in the right place

## The role of HR in the various strategic engagements

The HR Department carries and supports several of Fluvius' strategic commitments that shape and implement new policy. Some commitments focus on the short term and others have a slightly longer-term realisation timing. The commitments always apply to all Fluvius employees, because we want to put every employee at the centre.

The lead contribution from HR is expected for these two strategic commitments:

- The necessary operational and behavioural competencies (in line with our strategic workforce planning) have been defined and developed.
- Shared leadership and the culture we strive for are fully embedded in our organization.

We want to continuously detect and develop the competencies we need to do different things or to do things differently now and in the future, in such a way that Fluvius employees increase their employability in Fluvius and in such a way that Fluvius is and remains relevant to all stakeholders. To this end, we have determined a number of Top Skills at the Fluvius level that we put first:

### Groeigerichte mindset

- **Leerbereidheid:** bereid om jezelf te blijven uitdagen en levenslang bij te leren
- **Veranderbereidheid:** bereidheid om gewoontes aan te passen
- Continu verbeteren
- Zelforganisatie

### Digital mindset

- Digital problem solving
- Informatie en data geletterdheid
- Digitale communicatie en samenwerking
- Digital safety

### Klantgerichte mindset

- Klantnoden, wensen en verwachtingen identificeren en begrijpen
- Klantgericht communiceren
- Initiatief nemen om werkwijzen klantgericht te herwerken

## Human rights

Fluvius has a human rights policy based on frameworks such as the UN Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, the International Labour Organization's (ILO) core labour standards, OECD guidelines and national legislation and policy frameworks. No concessions are made on these human rights principles. Hereby, we reaffirm our responsibility to respect and promote human rights as endorsed in our [Statement on due diligence \(GOV-4\)](#).

The human rights policy contributes directly to the management of material impacts, risks and opportunities associated with our own employees. Fluvius has set up policies and processes to remain in dialogue with all employees and their representatives. This includes structural social dialogue, company-wide surveys and open sessions in which employees can share their experiences and expectations. Some examples of this are the [Great Place To Work](#) survey and the well-being survey. Based on this input, Fluvius continuously tailors its policies and processes to the needs of employees. In addition, Fluvius has also set up several confidential [channels](#) to offer the opportunity to express concerns or complaints. Fluvius guarantees anonymity, confidentiality and independence, while enabling quick and appropriate measures. No incidents related to human rights policy were reported in the 2024 financial year.

The main risks identified for own employees from the risk analysis for human rights in the value chain relate to safety risks. In our policy for the [Prevention of accidents at work](#) and the Global Prevention Plan, the necessary measures are taken to continuously guarantee safe working conditions and to avoid accidents as much as possible. In the [Health and safety metrics \(S1-14\)](#), we closely monitor the evolution within this area. Moreover, these objectives are also included in the [Integration of sustainability-related performance in incentive schemes \(GOV-3\)](#).

## HR policy communication

Communication about the policy and its changes is done in several ways. On the one hand, staff members who are responsible for implementation are informed via training forms (information sessions, webinars, etc.), and on the other hand, all employees to whom the policy applies are informed via internal communication channels (e-mail, intranet, information moments, etc.). In the event of changes to the policy, it will always be determined which communication is most suitable. Current restrictions, the needs of the applicable target audience and visibility are also taken into account. This should ensure that all necessary information is accessible and understandable to everyone and at any time.

## Prevention of accidents at work

In everything we do, we strive to deliver high-quality work, driven by craftsmanship. Safety is paramount here. Our activities must not compromise the health or physical integrity of employees, network users or third parties in any way. Accidents related to electricity, natural gas or heat (hot water or steam) are called fluid accidents. The consequences of these fluid accidents can be very serious. As true specialists in this field, we must perfectly manage the risks involved. That is why our goal is ZERO accidents.

We strive for a safety culture that stimulates safety awareness and conscious safe action at all levels of the organization. Our goal is to create a workplace where everyone experiences conscious safe working as their own responsibility. We do not want to distinguish between internal or external employees, contractors or suppliers. After all, safety is something we do together.

To achieve this, all employees receive thorough training, we pursue a proactive prevention policy which leaves room for initiative and we strive for continuous improvement. This means, among others, that we must constantly analyse and improve our work equipment, working methods, processes, products, etc. In this way, we want to limit the risks and any adverse effects on people and the environment as much as possible.

In addition, attention is also paid to the Work-Life Balance of each employee and we support initiatives that promote this balance. Thanks to the daily efforts of every employee, we create a pleasant and safe working environment and make Fluvius a Safe Place To Work.

The Global Safety Prevention Plan 2021-2025 sets out how we will continue to work on a Safe Place To Work. This plan was drawn up on the basis of the findings from three perspectives: a participatory risk analysis according to the MUOP0 technique (people, equipment, environment, product and organisation), an external audit to test compliance with the applicable welfare legislation and the measurement of the safety culture in Fluvius.

The priority points for work were translated into actions and grouped under five themes, each of which was subject to a deadline and estimate of resources and the allocation of a responsible person.

The action themes within the Global Prevention Plan 2021-2025 are:

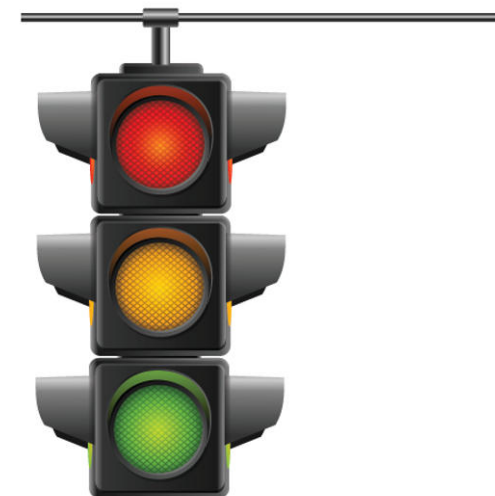
- Harmonize and simplify safety directives
- Optimizing site and safety coordination
- Further develop safety culture and perception among employees and contractors
- Managing and reducing safety risks
- Raising awareness and safeguarding safety competencies

The progress of this is reported to the Management Committee and monitored within the management system of the Prevention, Welfare and Environment Department. This follow-up also includes the monitoring of [Health and safety metrics \[S1-14\]](#).

Doe de werkplekcheck

**Stop  
Denk  
Doe.**

Simpel toch!



## Diversity and inclusion policy

Fluvius wishes to take its social and moral responsibility around the theme of 'Diversity & inclusion'. Broadening diversity and striving for full inclusion fits in perfectly with:

- the strategic pillar 'employee centric'
- the core values: Together, Proud, Engagement, Respect, Customer centric
- striving for a Great Place to Work for all Fluvius employees
- embedding a culture of trust, shared leadership, open communication and continuous feedback
- a high awareness of decision-making and acting with integrity
- zero tolerance around transgressive behaviour and discrimination.

Fluvius approaches promoting diversity and inclusion as a culture change process linked to a mindset evolution. Like other cultural changes, this requires a long-term and adaptive effort, based on a clear and authentic commitment.

Since 'Diversity & Inclusion' is a sensitive, personal, broad and complex subject, a solid support base is essential. This support starts with the Management Committee members, policy team members and managers. Initially, Fluvius will limit the target group of the Diversity & Inclusion Policy to its own employees, notably Fluvius employees, applicants and future employees, working students, dual learning students and trainees. Fluvius therefore focuses on the internal processes related to attracting and retaining people: recruitment, selection, internal mobility and flexibility, remuneration, communication and training. In the next phase, Fluvius also wishes to apply the Diversity & Inclusion policy to its customers, suppliers and local communities.

## Ambition inclusion

Fluvius wants to continue to proactively focus on creating and perpetuating a Great Place to Work for all its (future) employees

- so that everyone's contribution counts equally, learning opportunities and other opportunities are offered and everyone's input is welcomed,
- where employees can be themselves and experience their identity with respect for the company context and the Fluvius values
- where they are physically, psychologically and socially safe,
- where they feel seen, heard and treated fairly.

## Ambition diversity

Fluvius wants to actively increase diversity among its employees

- we want to better reflect society, our customers, in our company and we therefore focus on more diverse influx by approaching (also) other target groups,
- we are convinced that continuing to focus on diversity in our company and ecosystem, is the only right and sustainable choice,
- we are working on broad positive support within Fluvius, among management, executives and employees, so that diversity is anchored in our Fluvius DNA and values.

## Commitments to diversity and inclusion

Every Fluvius employee has a role to play in the success of diversity and inclusion efforts. That is why Fluvius is committed to:

- identifying the various initiatives and principles used to promote diversity, inclusion, equal treatment and equal opportunities,
- the sustainable development of our managers and employees around positive beliefs, skills and understanding around diversity and inclusion,
- the continuous dialogue with its employees and stakeholders on diversity and inclusion,
- Continuously improving systems, processes and procedures to increase diversity and inclusion.

## Critical success factors

Fluvius uses eight critical success factors or drivers to meet the challenges associated with Diversity & Inclusion.

1. policy creation and governance
2. research and vetting
3. raising awareness and support
4. training and coaching
5. attracting and managing talent
6. adapt other relevant processes, systems, procedures
7. image, reputation and external communication
8. measuring and securing

## Recognition for our policy

In 2024, Fluvius won the HR Ambassador Award, which focused on the theme of Diversity & Inclusion this year. In addition, we also received the 'Reference Certificate Inclusive Enterprise' in recognition of our sustainable HR policy.



## Great Place To Work

### What is a Great Place To Work?

Great Place to Work consists of an annual survey. Since 2019, we have been organising the survey in the autumn of each year. Every Fluvius employee can complete the survey anonymously. This is the ultimate chance to give your opinion. The survey gauges your feelings and experience in five domains: respect, credibility, honesty, pride, fun and camaraderie.

Our independent partner, Vlerick Business School, conducts this survey every year. By treating this survey from an external perspective, anonymity and objectivity are guaranteed.

### Why does Fluvius want to be a Great Place To Work?

At Fluvius, we consciously choose to be a 'Great Place to Work' for all our employees. This is in line with our Focus 2025 strategy: we want to put our customers and employees centric. By means of the annual Great Place to Work survey, we want to hear from our employees how they really experience working here. The survey results tell us in an objective way what we are satisfied with, even very satisfied with.

But we also learn where the shoe pinches: what are we less or not satisfied with? This provides us with useful insights: what should we definitely continue to focus on? What do we want to see perpetuated, and of course: what really needs to change? The survey gives everyone the opportunity to also leave a word of explanation about how he or she experiences working for Fluvius. This is a real added value. A statistic makes it objective, we learn even more from a story. Every year, we look at what actions are needed to maintain the positive and to be able to offer an increasingly better working environment to our employees.

Fluvius wants to be and remain an organisation with a culture that excels in:

- Trust: between colleagues and between management and employees
- Pride: employees are proud of their job, their team and their company
- Fun and camaraderie: among colleagues in the workplace



## Trust is essential in a Great Place To Work

There are five dimensions that are assessed in the Great Place to Work survey.

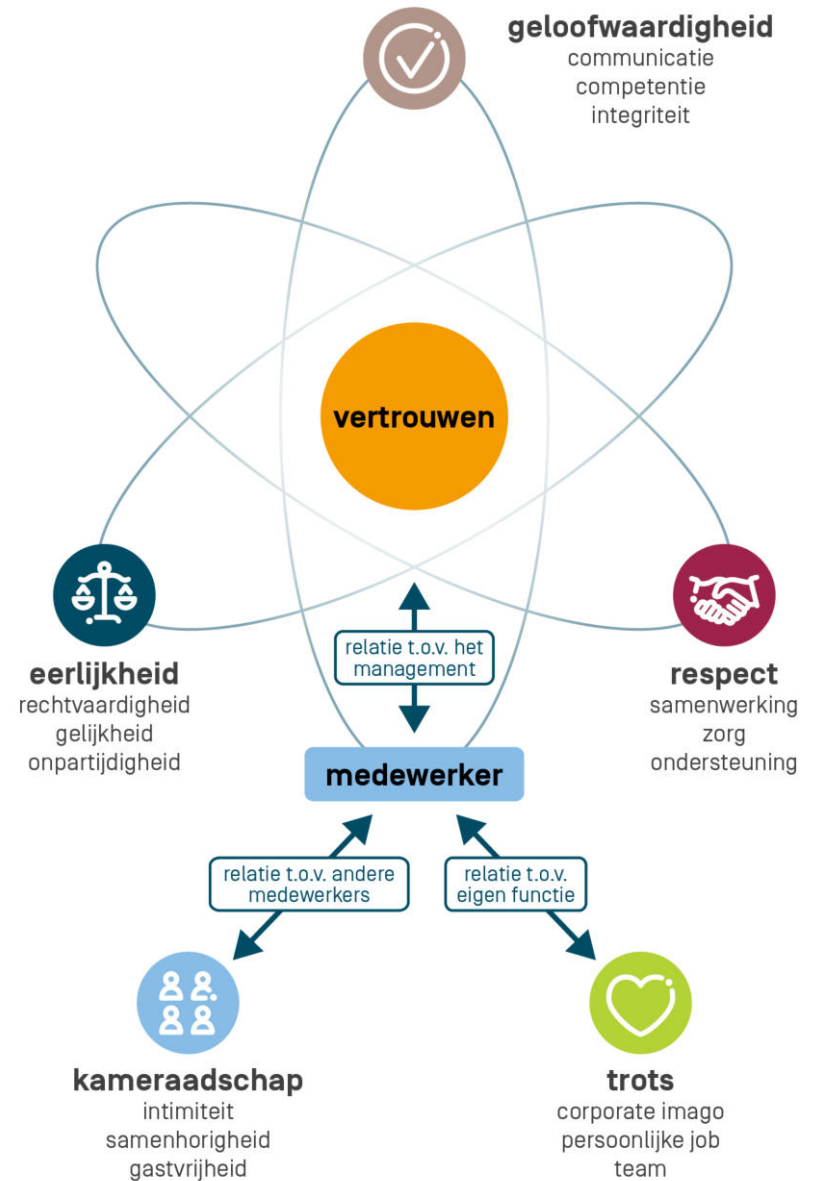
Three dimensions have a direct link with management:

- credibility: how does the communication work, how competent do you think the management is, how much integrity do you think management has?
- respect: do you feel supported, how is the cooperation going, are you taking care of each other?
- fairness: is everything fair/impartial?

A fourth dimension is about the relationship between the employee and his job. This is about pride: how proud are you of what you do and achieve, how proud are you of the team and of the company?

A fifth dimension is about the relationship between the employee and his colleagues: camaraderie. This is about a team spirit and hospitality.

Central to this model is trust.



## Culture

Culture is about what people do, even when no one is watching. It largely determines whether we are successful and if we make our mission, vision and strategy a reality together. With 5,863 colleagues, we strive for a culture in which trust, shared leadership and the Fluvius values are central. Our values are: Together, Proud, Engagement, Respect and Customer Centric. We held these up to the light of our role in the energy transition & climate adaptation for Flanders. We believe that pursuing these values remains the right choice.

All Fluvius employees are 'Sterkhouders'. Teams can actively work with these values and are supported in this by a team coach. This allows them to identify what is going well and where there is room for growth. This can be done on the basis of a range of tools such as reflection tools for dialogue, inspiration sessions, workshops, DIY tools, ... These new habits are then integrated into the daily work at Fluvius.



## Shared leadership

### What is shared leadership? So what is different in practice?

The point is that the team can take more initiative in their daily assignments. From a clear trust of the management and therefore without having to check everything up. In concrete terms, the manager will no longer just lead meetings, give people feedback, divide work, set goals,... The team is given the space and takes responsibility for doing more of that themselves. Employees can also make more proposals to improve the work, they can nominate candidates for assignments themselves, indicate when they have an objection to a decision, and so on.

### Why is Fluvius committed to shared leadership?

Teams that invest in shared leadership have an easier time collaborating and staying connected in a fast-paced environment. Because not only is the work more easily coordinated and divided, but also taking care of each other is being shared more. You are used to helping each other and picking up signals if someone has too much work or something is bothering you. Instead of only the manager being the central pivot, everyone is ready to provide support.

In addition, it is also true that our customer expects solutions and answers faster and faster. In a digital age where everything is online and immediately available on the web, hierarchical leadership is simply too slow. So if the man or woman in the field, in the action, is able to make a decision and offer the customer a solution faster, then shared leadership also helps to deal more dynamically with our customer questions.

When responsibility is shared more, you no longer feel like a number. You don't feel like you just have to press a button in a fixed process. On the contrary, you feel that you are an important link and this makes you come to work with more pleasure. You are proud of what you have decided and done. You can also shape your job and the teamwork more yourself, because your ideas are listened to and that also gives more satisfaction.

## Career and development

### Talent mobility

At Fluvius, we offer the necessary tools to further develop talents. To get better at what you do or to gain new experiences and push boundaries. The Talent Mobility Department looks ahead together with the employee, because we want everyone to be the best version of themselves. Each management has a permanent Talent Mobility coach for support.

At Fluvius, we have a clear mission and vision (see [Our mission, vision, strategy and values](#)). Talent Mobility contributes to this by focusing on the development of strong talent. This talent story consists of three pillars:

- We always strive for employees who can be deployed in more than one job within Fluvius.
- We believe in a learning organization and strive for growth for every employee.
- Each employee is responsible for his/her personal growth and career trajectory.

As an integral part of its HR policy, but also in response to reorganisations, Fluvius is committed to internal mobility for all employees with the aim of achieving high retention.

### Fluvius Academy & competency management

Fluvius Academy also contributes by offering numerous classroom, hybrid and online training courses. Among other things, they receive new employees and supervise curricula. A curriculum is a sequence of training courses that an employee must follow. When these training courses have been successfully completed, he/she obtains the required competencies and qualifications, and the employee is allowed to perform these specific activities. These tasks and responsibilities are fixed in positions.

There are different categories of competencies that can be distinguished. Within Fluvius, we have four categories: operational, behavioural, safety competencies and qualifications.

Indicators related to training can be consulted in [Training and skills development metrics \[S1-13\]](#).

### Feedback process

In the feedback process, employees and managers formulate objectives about tasks, attitude and development in dialogue. Based on continuous and mutual feedback, they follow up on the set objectives efficiently and effectively. At the end, they take stock of the past year and formulate any follow-up actions for the new year. For executives, the final evaluation also has a financial impact on variable remuneration.

A feedback process has also been set up at De Stroomlijn in which every employee receives a regular evaluation.

Indicators related to the feedback process can be consulted in [Training and skills development metrics \[S1-13\]](#).

## Vision on 'People' in sustainable and future-oriented buildings

In order to offer employees an optimal working environment, Fluvius integrates a vision of 'People' into its project definition for sustainable and future-oriented buildings. In the design of buildings, several criteria are taken into account, such as acoustics, thermal comfort, indoor air quality, visual comfort, heritage value, socially safe design, integral accessibility and user influence.

### The New Way of Working [NWW]

At The New Way of Working, we focus on location-independent working. This means that you can do your work from any location, from home or at the office.

Being able to work smoothly with digital tools and resources (such as Teams and Sharepoint) helps us with this. In addition, we must be able to work on the basis of trust and autonomy, fully in line with our choice for shared leadership.

If we all start working more location-independently, our office environment will have to be adapted to this. We will mainly go to the office to work together and consult with our colleagues. Those who want to will be able to do individual tasks more from home. That is why we will move away from fixed individual workplaces in the office and we will see a shift to individual flexible workplaces and collaboration spaces.

All this is called The New Way of Working:

- work more location-independently and adapt our office environment accordingly
- working with modern digital tools and resources
- working from trust and autonomy in line with the choice for shared leadership

Why are we doing this?

- The New Way of Working offers you more flexibility and ensures that you can better balance your work/life balance.
- By having to travel less to work and between different locations, you lose less time in traffic jams and you help the environment.
- Further developing our digital skills ensures that we can do our work more efficiently and that we can work from any location. We can also work more easily with colleagues from different locations.
- Commitment to the New Way of Working ensures that we remain an attractive employer in the labor market.
- And it is fully in line with our choice for shared leadership, in which we want to work on the basis of trust and autonomy.

The New Way of Working puts the employee centric and helps us to be a Great Place to Work.

## Change management

In the event of changes in the organization, a team of change experts is always ready for every employee, every team and every project or programme. They offer support to successfully implement changes. These can be different types of change: a project, reorganization, process change, culture change, ... The team of change experts provides answers to the five basic questions: what, why, who, when and how? In addition, they create a framework for dealing with change and provide various tools.

### Why Change Management?

The success of a change depends on both the quality of the solution and the adoption of the change by the employees. In change management, the focus is on the adoption and use of the changed or new solution by the employee.

### What is Change Management?

Change management is a structured method to increase adoption among the impacted target groups. Fluvius uses the ADKAR framework (Awareness, Desire, Knowledge, Ability & Reinforcement) for this. A change is only successfully implemented if all employees impacted by the change have gone through all successive "ADKAR phases". That is why it is critical to be in touch with what is going on and what concerns there are by means of field surveys. Based on this, change actions can be carried out in a targeted manner.

### When Change Management?

Change management is applied to every change that has a significant impact on employees within our organization. Change management is always applied to all programmes and projects. Change management can also add value to other initiatives. The aim and strong recommendation is to include this from the inception or initiation phase up to and including the implementation phase.

### Who does Change Management?

We distinguish four 'change roles', each of which contributes to the successful implementation of a change with a shared responsibility:

- Change manager: managing the human side of the change
- Change expert: soundboards with and/or support of the other change roles
- Change sponsors/stakeholders: showing exemplary behaviour, leadership and vision for the change; dealing with resistance; communicating
- Change agent: ambassadorship, communication, listening and interacting, supporting, detecting and dealing with resistance, monitoring progress

### How do we do Change Management?

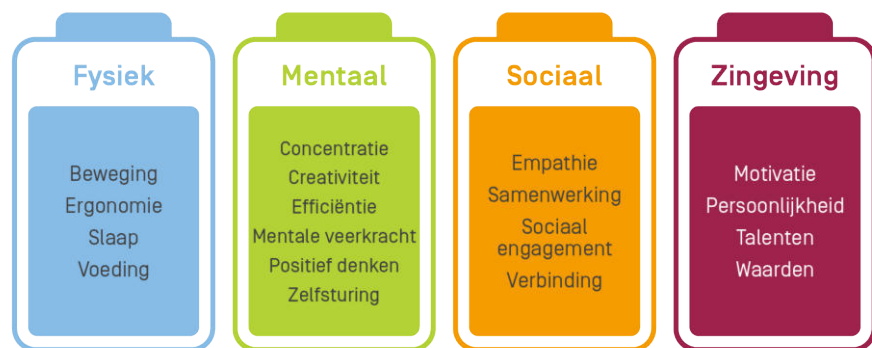
The change process goes through three phases to transform from where we are today (AS IS) to the desired result (TO BE). Each phase includes a number of change activities (thirteen in total). These activities can follow each other, run in parallel or have to be resumed until the objectives are achieved.

The change approach: three phases with thirteen activities, including one universal activity of site surveying.

- Preparing for change
  - Why, how and what?
  - Analysing change impacts
  - Analysing stakeholders
  - Identify change sponsors & agents
  - Draw up a change action plan
- Managing change
  - Communicating
  - Sharing knowledge
  - Activate change sponsors
  - Using change agents
- Embedding change
  - Evaluate
  - Transfer
  - Close

## Well-being

We want to provide tailor-made guidance to all Fluvius employees towards well-being, in an accessible, confidential and people-oriented way. To represent the distribution of human energy, we at Fluvius use the metaphor of the battery. Every human being has four batteries: the physical, mental, social and meaningful battery.



An optimal energy level is determined by what you do during the day at work, at home, ... But also because of the way your four batteries or energy sources work together. If that cooperation goes well, all four are sufficiently addressed, then you have a lot of energy and you move mountains. If they work less well or not at all, you have energy shortages and everything is harder for you.

We care about the mental and physical well-being of our colleagues. In addition to the efforts that managers make in their teams, central support is also being offered from the well-being policy in different areas:

- In function of **occupational safety**, information is made available about basic rules, points of attention and risk analyses. All information on what to do in the event of an accident is available. In addition, the accident figures (statistics) can be consulted.
- When a colleague becomes unwell or has an accident in the workplace, **first aid** is important. Within Fluvius, a number of people have been trained to provide first aid, in both minor and serious accidents.
- We offer support in the event of **shocking events** such as a death, an incident of aggression or a serious accident at work. At such a moment, the colleagues involved are brought together in a safe environment so that people can recover and that we can ensure that people can continue in their jobs afterwards.

- **Transgressive behaviour**, direct or indirect, requires the necessary follow-up steps. We offer information about this and explain what Fluvius can do in such a situation. Colleagues, managers and the person in question are also given tools to deal with this.
- A **healthy body** is also part of well-being. We share tips for ergonomic and healthy sedentary work and have a Energy@Fluvius programme to get colleagues **moving** as much as possible in collaboration with Golazo Energy on four themes: our brain, exercise, nutrition and sleep.
- We offer information on **alcohol and drug use and addiction** and explain what Fluvius can do in such a situation. Colleagues, managers and the person in question are also given tools to deal with this.
- **Stress and burnout** are important health problems. There is nothing wrong with stress in our lives. Most people need healthy stress to have enough challenge and feel good. However, stress becomes a problem if the burden (the amount of stress or the severity of the stressful situation) is greater than our capacity (the resources we have to deal with the situation). We offer 1-on-1 conversations, webinars and workshops to discuss and tackle the theme.
- We stay in touch with colleagues in **illness** and support their **reintegration process**. All this at the pace and tailored to the people involved and the situation. Both employees and managers receive the necessary information.

Training and education support employees, teams and managers and pay attention to both the proactive and healing. Digital solutions are also provided with a range of online mini-training courses. In addition, a DIY kit for well-being has been drawn up to inspire you to keep energy high and to make well-being a topic of discussion in teams.

On a regular basis, Fluvius organises a well-being survey among all employees, in collaboration with Impetus Academy. The results give us a clear picture of what we are good at in terms of well-being and where we can still take steps in the right direction. Afterwards, these results are also shared transparently with all employees. Teams can discuss the output for their department and actively engage with it. The necessary support is offered for this.

In 2024, we also received recognition for our well-being policy with the Mindbeats Award.

## Employees at De Stroomlijn

Operationally, and therefore also in terms of HR, De Stroomlijn is to a large extent an autonomous company that performs functional, service-providing tasks on behalf of Fluvius System Operator. In doing so, they pursue their own personnel policy, of course with respect for the applicable legal context in Flanders and Belgium, where they operate. For example, just like Fluvius, they will have a prevention policy, training offer, social support, etc. to their own employees.

As a customer contact centre, the employees of De Stroomlijn are the beating heart of the company. Diversity, work-life balance, team spirit and growth opportunities are the assets of their 374 employees.

*“At De Stroomlijn you have plenty of room to grow”*

Patrick Put  
HR-manager

Like Fluvius System Operator, De Stroomlijn has set up a structure for social consultation and whistleblower channels in accordance with the applicable regulations. The company uses collective labour agreements and some historically structured regulations for certain employee statutes. Employees can benefit from high-quality guidance in their careers, offering training opportunities and guaranteeing feedback for each employee.





# Processes for engaging with own workers and workers' representatives about impacts [S1-2]

**In order to consult with its own workers and workers' representatives about impacts, Fluvius mainly sets up processes for social dialogue. These processes facilitate the integration of resulting viewpoints into the company's decision-making processes. By appointing employee representatives within our own organisation, we guarantee close involvement with our own employees.**

## Structure of the social dialogue within Fluvius

Fluvius as an operating company consists of two parts: Fluvius System Operator (SO), the private company in the form of a cooperative company (CV), and Fluvius Opdrachthoudende Vereniging (EN: Mandated Association; hereinafter OV), a public company. The social dialogue in both companies has its own specific functioning, but collectively represents all Fluvius employees.

With the Protocol for the organisation of social dialogue in Fluvius (Agreement of 30 August 2019), we have tried to coordinate the social dialogue and organisation for both OV and CV as much as possible. Ultimately, we all work under one Fluvius umbrella.

Belgium is known for its system of social dialogue. This institutional system of negotiations at different levels between the social partners results, among other things, in the conclusion of collective bargaining agreements (CBAs). The results of the consultations relate to working conditions as well as wages and the management of social peace. The structure of social dialogue in private companies (such as a CV) is largely regulated by law.

In a public company (the OV), the structure is somewhat different from that within private companies; the regulations and legal basis are also different.

For the OV, we are subject to the Royal Decree of 28 September 1984 which organizes the "Implementation of the Law of 19 December 1974 regulating relations between the government and the trade unions of its personnel". The Local Government Decree of 22 December 2017 (Belgian Official Gazette, 15 February 2018) also forms an important basis.

A fundamental difference between the OV and the CV is that for the OV, in the end, it is always the Board of Directors (BoD) that can make a final decision. The legislator states that trade union negotiations and consultation must take place and that this must result in a protocol/advice. This method serves in an OV to guarantee "social peace". Everything is thus only really ratified after a decision by the Board of Directors. As far as the statutory provisions (e.g. HR-related items) are concerned, they only become really mandatory when they are included in the respective employee statutes.

We say "respective" employee statutes since within the OV, Fluvius all statutory employees of the former DSOs were appointed while retaining their specific employee statute, pension statute, social statute, etc.

## What are the differences between the social consultation processes of Fluvius SO and Fluvius OV?

Process	Fluvius SO	Fluvius OV
Selection of representation	In social elections held every four years in which all staff members are free to participate, employer representatives are appointed and employee representatives are elected. They sit on the official consultation bodies and assist members, participate in specific meetings at company or sector level, etc.	Unlike the private sector, there are no social elections within the OV. All so-called 'representative' unions have the option of appointing (as many) union delegates in implementation of the above-mentioned union statute.
Number of technical business units	For the purposes of the quadrennial social elections, Fluvius is considered as three technical business units, with three Works Councils (NL: OR) and three Committees for Prevention and Protection at Work (NL: CPBW), i.e. East, West and Departments, in which the delegates elected in the three respective constituencies sit.	Fluvius OV operates as a single technical business unit.
Works council	It was agreed that in practice the three Works Councils will function as one Works Council for the whole of Fluvius SO. The Works Council has a role as an official consultation body around policy, such as adjustments to the labour regulations or fixing replacement days for holidays. The Works Council is competent for decisions relating to the Social Fund, passed on to the Social Fund Executive Committee. The latter takes decisions on the Social Fund regulations and their application modalities and there the financial resources of the Social Fund are being monitored.	The Special Negotiating Committee (or NL: BOC) is the counterpart of the works council. Within the OV, it is the official body that negotiates on statutory issues such as pay, working hours, holidays, etc. The so-called 'social programming' (in the case of the CV this is the collective bargaining agreement) is also done through this body. Within a BOC, departmental reorganisations, integration projects, takeovers, etc. are also explained; in short, all processes and/or projects that have an impact on the statutes of the employee are discussed there. Decisions on social statutes (social regulations and fund for medical/social allowances) must also be discussed in the BOC.
Well-being	The CPBW is the official body that provides 'advice' around all areas of the Welfare Act (including occupational safety, prevention, ergonomics, psychosocial risks... ).  Since the implementation of the Welfare Act is very important for all employees, regardless of their statute, it was agreed with the trade unions to set up one overall internal prevention service within Fluvius. The prevention adviser and his team of experts thus work for both the CV and the OV, so that a uniform policy and equal advice are developed for the whole of Fluvius.	The High Consultative Committee (or NL: HOC) is the counterpart of the CPBW.
Parity	A Parity Platform Fluvius SO has been established in which the employer's members, the national union secretaries and some trade union delegates sit. Although it is not an elected consultative body, they deal with certain social dossiers at the level of Fluvius SO and it is at that level that company collective bargaining agreements are concluded. The Parity Platform is also responsible for managing the Parity Retirement Fund.	The Fluvius Joint Parity Consultation (NL: FGPO) was established within Fluvius as a platform consisting of the Parity Platform for Fluvius SO and representatives of employers' and employees' sides of Fluvius OV. This is a platform, without decision-making powers, where important common themes (which concern all employees within Fluvius) can be coordinated in advance before going to the official bodies.
Local consultation	Specific issues can be discussed more in the Local Syndicate Consultation (NL: LSO). These are installed in different sites or divisions spread across the Fluvius	The Local Consultative Body (NL: L00) is an informal consultative body within the OV. Through this Local Consultative Body, we want to organise an informal

Process	Fluvius S0	Fluvius OV
Qualifications	<p>area. They deal with agenda items such as concrete safety and hygiene in the field, concrete application of general rules that apply within Fluvius, e.g. on teleworking, the use of service vehicles, clarification regarding regulations on mobility, etc.</p> <p>There is a local parity qualification group (LPG) whose purpose is to deal with all qualification matters for clerical positions in accordance with the applicable sectoral provisions. The composition of this group is made up of a group of permanent members of the employee delegates of the representative trade unions, to be augmented by a defined additional number of trade union delegates depending on the part of the organisation to which the dossiers to be discussed belong. The distribution of the number of mandates per trade union is based on the result of the social elections.</p>	<p>consultation at local level, through which certain facility issues and employee questions can be addressed. From the moment these items become higher-level subjects, they are escalated to the FGPO, the HOC or the BOC.</p>
Frame	<p>The Framework Committee Fluvius S0 is an unofficial consultative body, where specific problems of the executives are presented, discussed, explained and agreed upon. In that body, specific agreements for executives are also concluded.</p>	

## Organisation of social dialogue

The social dialogue is organized by law.

In the practical organisation between the social consultation structures of Fluvius SO and OV, the dates on which the meetings take place for the BOC and HOC are fully aligned with those of the Works Council and CPBW. This allows us to negotiate important decisions for both the CV and the OV almost simultaneously.

The various social consultative bodies meet on a regular basis in order to be able to respond to developments both proactively and reactively.

Operationally, it is the HR director's ultimate responsibility to ensure that social dialogue is conducted. Based on the content of each consultation process, the practical organization will be taken up by assigned departments. The feedback on the results of the social consultation is provided via the Management Committee, of which the HR director is a member.

Consultation process	Frequency
Social elections	4-yearly, the most recent elections took place on 23 May 2024.
Works Council/BOC	Monthly (excl. July & August)
CPBW/HOC	Monthly (excl. July & August)
Parity consultation/FGPO	Parity platform 4x a year, FGPO monthly
Local consultation LS0/L00	Monthly (excl. July & August)
Qualifications LPG	Regularly
Framework committee	4-yearly

## Trade union service facilities for employee representatives

In order to make trade union operations possible in a correct manner, agreements were made about time commitment and cost reimbursement. These agreements must lead to the trade union mandates and activities being included in a good relationship and with respect for the operational activities of the services in which these representatives are employed.

## Social consultation at De Stroomlijn

At De Stroomlijn, too, social dialogue is legally organised with bodies such as the works council, the Committee for Prevention and Protection at Work, trade union delegation, and other provisions set up in accordance with the welfare legislation.

# Processes to remediate negative impacts and channels for own workers to raise concerns [S1-3]

Fluvius has installed the necessary processes to cater for or to collaborate in the remediation of negative impacts which can be linked to the company, on persons within our own staff. The necessary channels are available for this purpose to flag concerns and to get a solution for this.

We want to create a supportive and responsive environment which helps in remediating negative impacts for staff members. Negative impacts are identified through the available channels to flag concerns; their impact is assessed by the competent authorities. Where needed, the most effective remediating measures are taken and communicated to the parties involved. They can deliver feedback and evaluate whether the remediating measures taken are sufficiently effective.

In the case of negative impacts on own workers, all employees can use several channels to file a formal complaint. Each channel has a monitoring mechanism for the execution of an independent investigation into the complaint and the formulation of the necessary remediating measures.

The channels that employees can use to flag concerns are:

Channel	Internal/external	Availability
Deontological Cell (formal complaint mechanism through whistleblower channels)	External complaint mechanism; internal Deontological Cell	Website
Employees' representatives (syndical representatives)	Internal	Intranet & physical on all work sites
External prevention service Attentia	External	Intranet & physical on all work sites
Prevention service (including social assistants, confidential advisers, medical services)	Internal	Intranet & physical on all work sites
Each manager	Internal	Intranet & physical on all work sites

Channel	Internal/external	Availability
HR SPOC per department	Internal	Intranet

<sup>1</sup> For more information on whistleblower channels at Fluvius, see G1-1

Every employee, irrespective of his/her statute (contractual or statutory), who has individual questions or has a dispute on labour relations or who establishes an infringement on the implementation of his statute, has the right to be assisted by a syndical delegate. Employees may have questions about their pay slip, payments, work schedules, holiday schedules etc. They can address their syndical delegate with these questions.

In the case of 'individual disputes', we think about inter alia a sanction or even the dismissal of an employee. In such procedures, each employee has the right to be assisted by a 'third party'. In many cases, they bring in the syndical delegate.

Several working groups are formed, with the participation of syndical delegates, to work out concrete proposals on specific topics, such as electric vehicles, amendments to the Labour Regulation,... There are also working groups at sectoral level, e.g. on the application of the personnel tariff. This approach makes sure that all stakeholders remain committed.

## Actions linked to material impact, and approaches to manage risks and opportunities, and the effectiveness of those actions [S1-4]

Fluvius uses the annual GPTW-questionnaire for measuring employee satisfaction and evolutions in the target culture towards a culture of trust, shared leadership and Fluvius values. Each year, corporate actions are set up or amended to improve weaknesses and to improve strengths.

In 2024, Fluvius wanted to continue its status of **Great Place to Work**-certified company and to take action on the three items which did not reach the 70% GPTW lower limit : impartiality, collaboration and internal dialogue. Among the Fluvius strengths are (non-limitative list): justice/non-discrimination, care, support, pride about company and own contribution, hospitality, camaraderie. The positive elements are also highlighted extra within the implemented actions.

Fluvius aims at a **culture of shared leadership**, and provides for an extensive learning plan for its executives, which begins with a introductory day for new executives, a number of basic trainings and various thematic leadership trainings. All teams can request team assistance and they can enter team trajectories starting from their own needs and requirements, which is needed if we want to evolve to a safe team climate aligned with the Fluvius policy on corporate culture. The GPTW team results can serve as a starting point, e.g. about the degree in which the team experiences autonomy and freedom, shared leadership or commitment.

The **Fluvius strategy is explained to all staff members** at different fora. The Fluvius CEO does so live in an annual roadshow at sixteen different Fluvius sites from the end of February until the end of April. Within each department and each team there are regular briefings about its own strategy and each team's contribution. Each team takes action with the objectives, embedded in the strategy and translates them into team and individual objectives. Each year, the strategy is also an organisational objective for everyone with a focus on strategic objectives. For example, in 2023, a discussion about the GPTW results and in 2024 taking action in the field of the strategic pillar 'Customer centric'.

The Global Prevention Plan Safety 2021-2025 implements the actions related to **safety**. We set up concrete actions within the defined themes, thus contributing to a Safe Place To Work.

In 2024, our **Diversity & Inclusion** policy was established. This was done after an extensive pre-assessment of the benefits and possible objectives, in an open dialogue with several internal stakeholders and after benchmarking. We came to the conclusion that a lot of elements that contribute to diversity and inclusion, were already enshrined in our HR policies. That is why we received the 2024 HR Ambassador Award on the theme of 'Diversity & Inclusion'. But this does not exclude that we will take further steps in the coming years to pursue a proactive policy in the different employee-related processes at Fluvius. These actions will create the basis for the critical success factors identified within the policy.

## Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S1-5]

In order to manage negative impacts, improve positive impacts and manage risks and opportunities, Fluvius sets result-oriented and time-bound objectives.

We want to take further steps towards a Great Place To Work with the Employee centric. These are major responsibilities with the following challenges:

- Culture
  - Further aiming at the focus themes so that we can realize the GPTW objective: impartiality, collaboration and internal dialogue
  - Shared leadership and shaping the culture we aim at
- Employee centric
  - Professionalise transition trajectories and the underlying trainings
  - Alignment between Fluvius SO and Fluvius OV employees
  - Facilitate the differentiation for top performers, talent development, talent management in the short and long run

Two long-term indicators have been set about which we frequently report to the Management Committee and the Board of Directors: the Great Place To Work score and the absenteeism rate.

The **absenteeism rate** has several underlying drivers, but if our employees are feeling well, there is an indirect and positive impact on the number of short or long term absentees. Feeling well is about collegiality, respect, having fun in your job, trusting your manager etc. ..., in short it's about why we value being a GPTW. The aim for the absenteeism rate is to do 0,25% better than a benchmark's results. In 2024, our absentee rate came out at 5.88%, which is better than the benchmark results.

Besides, Fluvius clearly aims at being seen as **Great Place to Work** by its own employees. The annual survey should therefore result in a score of at least 70%. In November 2024, Fluvius got a final score of 77%.

Attention for safety, efficiency, customer care,.. are being translated into objectives for a **CA090-SO**; the entire workforce can put in their effort and a bonus is paid at the end of the reference period based on the effectively reached results.

As to **safety**, the aim is to have no accidents at all. For the fluids accidents, 0 is our ultimate goal. Regrettably, over 2024 we have to report 3 fluids accidents. For the accidents' severity rate, Fluvius (excl. De Stroomlijn) strives to a score of below 0.07; for the frequency rate, the upper limit is set at 4. In 2024, the severity rate was 0.086 and the frequency rate 2.81.

The energy transition triggers a huge **recruitment boom**. For our recruitment and selection teams, it is quite a challenge and their aim to fill up these vacancies in time.

Winning awards is never an aim in itself, but it is a nice **recognition for Fluvius' sustainable HR policy**. In 2024, we even won two awards. We became HR Ambassador 2024 and we won the Mindbeats Award 2024 for our policy on well-being.



## Characteristics of Fluvius employees [S1-6]

Within the Fluvius Consolidated Group, one has to distinguish between different categories of employees: Fluvius SO, Fluvius OV and De Stroomlijn. Employees at Fluvius SO and De Stroomlijn have a direct contract within the Consolidated Group; they are being reported in S1-6. Employees at Fluvius do not have a direct contract with an entity within the Consolidated Group and they are reported in S1-7; but they are fully engaged in the Consolidated Group's activities. That is why in the other S1 sections, a consolidation approach is taken in which the Fluvius OV employees are considered as employees within the Consolidated Group.

These figures report the situation at the end of the reporting period (31 December 2024). Only active employees are counted for this reporting.

### Number of employees

	Female	Male	Other <sup>1</sup>	Not reported	Total
Fluvius SO	1,633	3,638	0	0	<b>5,271</b>
De Stroomlijn	259	115	0	0	<b>374</b>
<b>Fluvius</b>	<b>1,892</b>	<b>3,753</b>	<b>0</b>	<b>0</b>	<b>5,645</b>

<sup>1</sup> Gender as declared by the employee

The aggregate number of employees in countries where the company has at least 50 employees that represent at least 10% of its total number of employees:

Country	Number of employees (head count)
Belgium	5,645

### Number of employees per contract type (total numbers)

	Female	Male	Other	Not reported	Total
Number of employees	1,892	3,753	0	0	<b>5,645</b>
Number of permanent employees	1,770	3,694	0	0	<b>5,464</b>
Number of temporary employees	122	59	0	0	<b>181</b>
Number of non-guaranteed hours employees	0	0	0	0	<b>0</b>
Number of full-time employees	1,208	3,348	0	0	<b>4,556</b>
Number of part-time employees	684	405	0	0	<b>1,089</b>

### Number of employees per contract type (FTE)

	Female	Male	Other	Not reported	Total
Number of employees	1,745.6	3,669.4	0.0	0.0	<b>5,415.0</b>
Number of permanent employees	1,624.7	3,610.8	0.0	0.0	<b>5,235.5</b>
Number of temporary employees	120.9	58.6	0.0	0.0	<b>179.5</b>
Number of non-guaranteed hours employees	0.0	0.0	0.0	0.0	<b>0.0</b>
Number of full-time employees	1,208.0	3,348.0	0.0	0.0	<b>4,556.0</b>
Number of part-time employees	537.6	321.4	0.0	0.0	<b>859.0</b>

The aggregate number of employees who have left the company (Fluvius SO, Fluvius OV & De Stroomlijn) during the reporting period: 352. This equals 5.74% of the total number of the average number of employees.



## Characteristics of non-employee workers in the undertaking's own workforce [S1-7]

As explained in S1-6, Fluvius OV employees are considered as employees that are not directly on the payroll of the Consolidated Group. They are nevertheless fully engaged for the benefit of the Consolidated Group and thus they will be considered as Fluvius own workforce in the reporting below.

Fluvius has no further employees on its payroll. The HR policy does not permit to be part of the staff through a management company, nor as a freelancer. If someone who is not on the payroll of Fluvius SO, Fluvius OV or De Stroomlijn delivers services to Fluvius, this will always be on the basis of a procurement contract of service agreement. This person will then be an employee of a partner within the value chain (his/her employer). Fluvius' approach to employees in the value chain is commented upon in the chapter [Workers in the value chain \[S2\]](#).

Employees in the value chain can never be directly steered by Fluvius or a Fluvius employee, but at all times by the own employer (or the person itself in the case of a management company or freelancing), as stipulated by Belgian law.

### Number of employees per contract type (total numbers)

	Female	Male	Other	Not reported	Total
Number of employees	110	482	0	0	<b>592</b>
Number of permanent employees	110	482	0	0	<b>592</b>
Number of temporary employees	0	0	0	0	<b>0</b>
Number of non-guaranteed hours employees	0	0	0	0	<b>0</b>
Number of full-time employees	67	426	0	0	<b>493</b>
Number of part-time employees	43	56	0	0	<b>99</b>

### Number of employees per contract type (FTE)

	Female	Male	Other	Not reported	Total
Number of employees	100.3	467.1	0.0	0.0	<b>567.4</b>
Number of permanent employees	100.3	467.1	0.0	0.0	<b>567.4</b>
Number of temporary employees	0.0	0.0	0.0	0.0	<b>0.0</b>
Number of non-guaranteed hours employees	0.0	0.0	0.0	0.0	<b>0.0</b>
Number of full-time employees	67.0	426.0	0.0	0.0	<b>493.0</b>
Number of part-time employees	33.3	41.1	0.0	0.0	<b>74.4</b>

## Collective bargaining coverage and social dialogue [S1-8]

As explained in S1-2 as well, social dialogue for Fluvis is an essential tool to commit our own employees as stakeholders.

For Fluvis System Operator (SO), 100% of the own workforce fall under the scope of collective bargaining (within the EU). For Fluvis OV, 100% of these employees fall under the scope of the legal status regulation (RPR), according to their statute. At the subsidiaries too, 100% of their employees can enjoy the coverage of collective bargaining.

100% of our own workforce have access to employee representatives.

There are no agreements with our employees in place about the representation by a European Works Council (EOR), a works council of a European company (Societas Europea – SE) or a works council of a European cooperative company (Societas Cooperativa Europaea – SCE).

## Diversity metrics [S1-9]

To gain some insight into gender diversity at the level of higher management and in the age pyramid of the Fluvius employees, the data below are being shared. In our [Diversity and inclusion policy](#) more information can be consulted about our general approach of this topic.

### Gender diversity in higher management<sup>1</sup>

	Female	Male	Total
Management Committee	1	7	8
Senior management	7	43	50

### Diversity per age and gender (consolidated information)

	Female	Male	Total
Under 30 years old	175	344	519
30 – 50 years old	1,308	2,228	3,536
Over 50 years old	519	1,663	2,182

<sup>1</sup> Higher management is the group of the Management Committee (members of general management) and the Senior Management (Heads of Departments and Senior Experts) within the Fluvius own workforce.

## Adequate wages [S1-10]

The existing pay scales and wage bands in the different statutes at Fluvius comply with all conditions for minimum wages, both at national and sectoral level. At Fluvius SO, as well as at Fluvius OV, there is system for the qualification of the jobs performed, agreed with the trade unions. The different pay scales and wage bands are linked to this qualification, so that each employee receives the correct wage package, which corresponds to his/her job. Employees at De Stroomlijn also benefit adequate wages aligned with their jobs performed.

## Social protection [S1-11]

All Fluvius employees benefit from social protection against wage loss due to major events in life. Both through public programmes and additional payments by the employer, we offer protection against:

- illness;
- unemployment, starting as soon as the employee starts working at the company;
- Occupational accident and non-congenital disability (invalidity);
- Parental leave;
- Retirement;
- ...

Even at and after retirement, a guaranteed income, invalidity premium, extralegal pension, death coverage, orphan annuity, etc are provided to guarantee and supplement income. On top of that, several insurances are available for hospitalisation, ambulant care, accident in private life etc.

Besides, a social fund has been established with endowment by the employer which provides for several allowances at the occasion of different events and situations, such as an allowance for family assistance, in the case of a handicap, for orphans, when buying glasses, ...

## Persons with disabilities [S1-12]

To provide some insight about to what degree disabled people are part of Fluvius' workforce, data are presented with due regard to the legal limitations on data collection.

### Number of employees with disabilities

	Female	Male	Total
Fluvius SO	41	22	63
Fluvius OV	0	0	0
De Stroomlijn	0	0	0
<b>Fluvius</b>	<b>41</b>	<b>22</b>	<b>63</b>

## Training and skills development metrics [S1-13]

To provide insight into the activities on training and skills development being offered to our employees, within the context of a continuous professional development, the following information is presented.

Fluvius provides an annual facultative evaluation for employees; executives have access to a Personal Development Plan (POP) which is updated each year during the performance cycle. This is a recurring assessment of performance during which employee and manager enter into a dialogue and which happens on the basis of well-known criteria. HR provides for the general framework and, if needed, assistance.

Employees at De Stroomlijn receive an adapted evaluation cycle, adjusted to their job function. Employees who have direct contacts with customers, are evaluated each quarter with specific coaching; for administrative employees, there is an annual cycle.

### Number and percentage of employees taking part in frequent performance assessments and career development

	Female	Male	Total
Fluvius S0	318	853	1,171
Fluvius OV	23	105	128
De Stroomlijn	259	115	374
<b>Fluvius</b>	<b>600</b>	<b>1,073</b>	<b>1,673</b>
<b>Fluvius (percentage)</b>	<b>30%</b>	<b>25%</b>	<b>27%</b>

The figures above give an indication of the number of employees for whom a POP was drawn up in 2024, i.e. the executives at Fluvius S0, Fluvius OV and all employees at De Stroomlijn.

Fluvius Academy organises the full training program for Fluvius employees. The offered internal and external trainings serve to keep the skills of our employees up to date and to contribute to their continuous development and employability.

### The average number of training hours per employee

	Female	Male	Total
Fluvius S0	48.2	63.8	58.9
Fluvius OV	9.3	10.2	10.1
De Stroomlijn	111.4	108.7	110.6
<b>Fluvius</b>	<b>54.2</b>	<b>58.9</b>	<b>57.4</b>

The number of training hours per employee is calculated by dividing the number of training hours by the total number of employees. This is different from the definition used in the Social Balance Sheet which includes in the numerator the number of employees that actually had training during the reporting period.

## Health and safety metrics [S1-14]

As described in the policy for [Prevention of accidents at work](#), Fluvius uses a management system for health and safety at work. Our activities may not endanger in any way the health or physical integrity of the employees, grid users or third parties.

The entire staff falls under the scope of the company's management system for health and safety at work, based on legal requirements and/or acknowledged standards or guidelines.

In 2024, there were no cases of death due to occupational accidents or occupational diseases at our own workforce or due to occupational accidents or occupational diseases for other workers on the sites of the company.

Indicator	Fluvius
The number of recordable work-related accidents	25
The rate of recordable work-related accidents	2.77
The number of cases of recordable work-related ill health, subject to legal restrictions on the collection of data	0
The number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health	759

For 2024, this results in a severity rate of 0.084 and a frequency rate of 2.77. The number of fluids accidents <sup>1</sup> amounted to 3. These ratios were calculated on the basis of an aggregate number of working hours of 9,041,015 hours. The severity and frequency rates are scaled per thousands and million working hours performed respectively.

<sup>1</sup> An occupational accident with work incapacity of at least one day and of which one of the causes is a fluid (gas/electricity).



## Work-life balance metrics [S1-15]

The information below is presented to gain some insight into the rights of and the actual practices among our employees to take family leave, in a gender-just way, since this is one of the dimensions of the work-life balance.

All employees of the company have a right to family leave. The percentage of employees that actually took family leave is 11.05%, of which 8.67% men and 16.08% women.



## Compensation metrics (pay gap and total compensation) [S1-16]

To gain some insight into the size of the differences in compensation between women and men among the company's employees, in the size of the compensation inequality at the company and whether there are large compensation differences, the information below is presented.

Indicator	Fluvius
The gender pay gap, defined as the difference of average pay levels between female and male employees, expressed as percentage of the average pay level of male employees	-3.81%
The annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual)	10

For the pay gap between men and women, the basis-100 pay<sup>1</sup> is considered of the employee population that was at work during the entire reporting year at Fluvius SO or Fluvius OV. There were no available data for De Stroomlijn which could be assembled on the same basis. We estimate that the pay gap at De Stroomlijn does not significantly differ from the Fluvius pay gap.

In light of determining the proportion between the annual total reward for the best-paid person and the median annual total reward, the annual total reward is the total taxable reward (wages, premiums, benefits in kind, share options for Fluvius SO executives, ...) that the employee received during the reporting period, less the social security contributions, but before withholding tax.

<sup>1</sup> Here the gross wages are taken into account, before index adjustment, for a full-time equivalent, excluding overtime.

## Incidents, complaints and severe human rights impacts [S1-17]

To gain insight into the degree to which incidents at work and severe human rights impacts affect the company's own employees, the information below is presented.

This information includes, with respect to the relevant privacy rules, incidents at work with discrimination on the basis of gender, race or ethnic origin, nationality, religion or creed, disability, age or sexual orientation, or other relevant types of discrimination in which during the reporting period internal and/or external stakeholders in all activities are involved. This also includes incidents of intimidation as a specific type of discrimination.

An incident is defined as an admissible complaint with legal consequences at the Deontological Cell as the channel for members of the company's own staff to flag concerns. A complaint is only reported if it is declared admissible.

Indicator	Fluvius
The total number of incidents of discrimination, including harassment, reported in the reporting period	0
The number of complaints filed through channels for people in the undertaking's own workforce to raise concerns (including grievance mechanisms), excluding those already reported in the point above;	0
The total amount of fines, penalties, and compensation for damages as a result of the incidents and complaints disclosed above, and a reconciliation of such monetary amounts disclosed with the most relevant amount presented in the financial statements	0

Fluvius reports the information below about verified cases of severe human rights incidents (e.g. forced labour, human trafficking or child labour):

Indicator	Fluvius
The number of severe human rights incidents connected to the undertaking's workforce in the reporting period	0
The total amount of fines, penalties and compensation for damages for the incidents described in the point above, and a reconciliation of the monetary amounts disclosed in the most relevant amount in the financial statements	0



# Workers in the value chain [S2]

At Fluvius, we recognize the crucial role of employees in our entire value chain. From our own employees to contractors, service providers and suppliers with whom we collaborate, we strive towards a working environment that promotes safety, respect and development. In this chapter we highlight our efforts for creating a positive impact on the lives of the people that contribute to our services. This includes initiatives for safe working conditions, respecting a code of conduct and continuous education and training. By working together with our partners, we aim at a sustainable and just value chain in which everybody contributes to the energy and climate transition.

**IRO description**

**IRO type**

Impact on the quality of life for subcontractors through working conditions, work pleasure and labour conditions

**Impact positive**

Synergy with other utility operators and operators of public infrastructure

**Opportunity**

Insufficient number of suitable contractors and suppliers

**Risk**

## Interests and views of stakeholders [S2.SBM-2]

As described in [SBM-2](#), suppliers, service providers and contractors are identified as key stakeholders. They are represented by sector organisations in civil society. Fluvius' supply management is commented in [G1-2](#). We enter directly and indirectly into a dialogue with suppliers, service providers and contractors to take into account their interests and views in the development of Fluvius procurement policies.

## Material impacts, risks and opportunities and their interaction with strategy and business model [S2.SBM-3]

The material impact on employees in the value chain, as identified in [IRO-1](#), is part of the strategic commitment on 'Corporate Social Responsibility'.

Reporting on this topic takes all employees in the value chain that might be materially impacted, into scope. The types of employees in the value chain that might be materially impacted by the company, including impacts related to its own activities and the value chain of the company through its products or services, as well as through its business relationships, are:

- Employees working at the company's sites, but who are not part of its own staff;
- Employees working at entities in the upstream value chain (pre-chain) of the company;
- Employees working at entities in the downstream value chain (post-chain) of the company.

The material positive impact is situated in the procurement processes for subcontractors. Fluvius imposes requirements on the working conditions of subcontractors, and as a large organisation it represents a lever within the sector. The energy transition and climate adaptation that Fluvius is working on also create jobs for all types of employees in the value chain, and in-service training is offered for these employees. This positive impact mainly occurs within Flanders, Fluvius' operating area.

There is a link between material risks and opportunities and employee dependency in the value chain. This is the case with the risk of insufficiently suitable contractors and suppliers. Indeed, without them, there is no successful energy transition. In addition, synergy with other utility and public infrastructure operators also provides an opportunity. Customers will experience less disruption and Fluvius, by jointly contracting with other grid operators for key products, can capture the requested capacity at an acceptable cost. We maximise this opportunity through Synductis.

The aforementioned material risks and opportunities arising from impacts on and dependencies on its employees in the value chain specifically apply to critical contractors and suppliers (in case of insufficiently suitable contractors and suppliers), which is further explained in [Management of relationships with suppliers \[G1-2\]](#). For the opportunity of synergy, contractors that can carry out works on behalf of different utility and public infrastructure operators are specifically impacted.

As explained in the [human rights policy for workers in the value chain](#), a geographical analysis was conducted. This revealed no geographical areas (at country or other levels) or commodities for which there is a significant risk of child labour or forced or compulsory labour among workers in the company's value chain.

## Policies related to value chain workers [S2-1]

### Sustainable approach

As a major buyer of materials and technical products, Fluvius pays due attention to respect for human rights, especially in its supply chain. Fluvius is aware that there are risks associated with a supply chain organised on a global scale for some materials. We expect our suppliers, service providers and contractors to respect the principles of acting with integrity and corporate social responsibility. In this way, Fluvius aims to gain assurance of ethical conduct throughout our value chain in a number of areas. For example, this explicitly includes respecting international labour standards, health & safety, ethics, no discrimination, guaranteeing the mental health of employees, the right to collective bargaining within the organisation, living wages, free employment, ...

The policy for employees in the value chain is monitored within the Network Management Directorate and is part of the broader framework of Socially Responsible Procurement (SRP) and Fluvius' procurement policy. This is done within the context of public procurement legislation. Through *supplier management*, supplier relationships are built and maintained. In addition, quality assurance is carried out for key grid components. Current procurement needs are met through *sourcing* both grid-related and non-grid-related products and services. *Contract management* ensures proper monitoring of agreements and provides feedback to suppliers, service providers and contractors during the contract (including any mitigating measures). In the Sustainable Supply Chain Competence Centre, initiatives for making the entire procurement process more sustainable are brought together and followed up in a multidisciplinary way. More information on how Fluvius deals with its suppliers can be consulted in [Management of relationships with suppliers \[G1-2\]](#).

## Application of applicable regulations on workers in the value chain

Fluvius has various obligations in applying the applicable regulations regarding tenders, including in function of employees in the value chain, and until the execution of works with contractors in the right conditions.

### Grounds for exclusion in tenders

Exclusion grounds are in force in all tenders in Fluvius' procurement processes<sup>1</sup>. If a company bidding for a contract cannot prove that no violations to the grounds for exclusion occur, it will be excluded from participating in the tender.

The mandatory grounds for exclusion relate to:

- Participation in a criminal organisation
- Bribery
- Fraud
- Crimes or offences related to terrorist activities
- Money laundering and terrorist financing
- Child labour and other forms of trafficking in human beings
- Employment of illegally staying third-country nationals

These grounds for exclusion have a validity of five years from the date of conviction (except for illegal employment, five years applies from the date of the offence).

The tax and social exclusion grounds relate to:

- Tax payment arrears
- Remuneration arrears (National Social Security Office)

The optional grounds for exclusion relate to:

- Violating applicable obligations in the field of environmental, social and labour law
- Being in a state of bankruptcy or liquidation (as of declaration), a cessation of his activities, a judicial reorganisation
- Committing a serious error in the exercise of the profession such that its integrity may be called into question
- Making agreements aimed at distorting competition
- The occurrence of conflicts of interest
- Previous involvement causing a distortion of competition
- Significant or persistent shortcomings in the performance of previous assignments
- False declarations
- Undue influence on the decision-making process

### Carrying out work with contractors in the right conditions

Contractors carrying out work on behalf of Fluvius must always do so under the right conditions and in accordance with the general safety regulations set out in the specifications. Here, account is always taken of the location and nature of the work, which entails specific risks and which require corresponding work equipment, protective and preventive measures. Fluvius actively monitors this and will take measures if infringements are observed.

<sup>1</sup> Procurement Act of 17 June 2016, articles 67, 68, 69



## Human rights policy

Fluvius operates a human rights policy based on frameworks such as the UN Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, the International Labour Organisation's (ILO) core labour standards, OECD guidelines and national legislation and policy frameworks. No concessions are made to these human rights principles. By doing so, we affirm our responsibility to respect and promote human rights as endorsed in our [Statement on due diligence \(GOV-4\)](#).

The human rights policy contributes directly to managing material impacts, risks and opportunities related to our employees in the value chain. Fluvius has policies and processes in place to obtain human rights assurances from within the value chain and to maintain a dialogue with value chain employees and their representatives, our suppliers, contractors, service providers and customers.

Within our procurement policy and supplier management, we use exclusion grounds and issue appropriate regulations on working conditions and safety. In addition, a [supplier code of conduct](#) is signed when participating in procurement procedures. Our qualification and evaluation systems ensure identification of current impacts, risks and opportunities among employees in the value chain. In addition, Fluvius has also established confidential [channels](#) to provide the opportunity to raise concerns or complaints. In doing so, Fluvius ensures anonymity, confidentiality and independence, while enabling prompt and appropriate action. No human rights-related incidents were reported in 2024.

Human rights value chain risk analysis uses two key dimensions: the impact of potential violations and the likelihood of occurrence. Fluvius combines these factors to prioritise risks and determine the measures needed to effectively address the identified risks. This approach is reinforced by the segmentation of suppliers and the assessment of their risks in relation to their critical role within the value chain. The risk analysis is further enriched with a geographical analysis with regard to human rights violations, which helps Fluvius understand where its suppliers are located and what specific human rights risks are at play there. For each country, this analysis looks at the potential human rights violations likely to occur, given that country's broader political, social and economic context. This allows Fluvius to identify specific risks, for example in countries where violations such as discrimination, forced labour or poor working conditions are more common. In addition, this geographical analysis examined which human rights are most commonly violated in the countries where Fluvius' suppliers operate. Based on these findings, Fluvius identified and prioritised specific risk areas to effectively prevent violations within the supply chain.

The main risks identified in the human rights value chain risk assessment relate to safety risks and working conditions. As stated in our policy for the [Prevention of accidents at work](#), when it comes to safety within Fluvius, we make no distinction between internal or external employees, contractors or suppliers. After all, safety is something we all do together. Following the risk analysis, additional measures will be taken to further identify, prevent and mitigate actual and potential negative impacts on employees in the value chain.

## Supplier code of conduct

At the end of 2023, Fluvius adopted and published a [Supplier Code of Conduct](#). The code applies to all procurement and supply of goods and services, including contractors (further named as 'suppliers'). The Management Committee approved this code on 7 December 2023, and the Board of Directors took note of it by consent on 10 January 2024. This document is an essential tool to mitigate sustainability risks in our company's value chain.

Fluvius is committed to the principles of acting with integrity and corporate social responsibility. We expect the same from our suppliers. Key principles relate to international labour standards, ethics, health, safety and the environment. Thus, we prohibit child labour and expect free employment, living wages, feasible working hours, regular working relationships, the right to collective bargaining, no discrimination and humane treatment for all. The supplier always acts with integrity and conducts business in an ethical manner. The safety, physical and mental health of employees and suppliers is guaranteed to the maximum extent possible. In terms of the environment, the supplier makes efforts to reduce its impact.

By adopting this code of conduct, the policy towards workers in the value chain is also aligned with internationally recognised instruments such as the UN Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. In case of non-compliance, this can be reported through the evaluation systems and escalation procedures take effect.

The code of conduct was published on Fluvius' website and sent out to all current suppliers who can then commit to it. As these are ongoing contracts, Fluvius cannot impose this in these cases. For all new contracts, however, adherence to the code of conduct will be mandatory. Reports on non-compliance with this code of conduct can always be passed on through the whistleblower channels [see S2-3].

The code of conduct is an important lever for Fluvius and its partners in the value chain to become more sustainable. The commitment to follow this code is not an empty promise but a must for those who want to be part of our value chain and that of many other companies in the long run. It should become a catalyst for sustainable work on the energy transition.

## Consultation with workers in the value chain

Through various channels, regular discussions are held with workers in the value chain about material, actual and potential, positive and/or negative impacts that (may) affect them.

- **Sector organisations:** Representatives from the sector act as delegates of workers in the value chain and express their views to Fluvius and other companies in the sector.
- **Roundtable discussions:** A direct dialogue between Fluvius and suppliers and contractors puts material impacts on the table with the aim of gaining insight and identifying appropriate actions.
- **Strategic meetings with key suppliers:** Given the strategic importance of key suppliers, a direct meeting is organised at least annually between the Fluvius management and that of each key supplier to discuss current topics, with a view to achieving the strategic objectives.
- **Contractor days:** Fluvius organises these gatherings of contractors to explain current policies and processes, announce changes and actions, and communicate objectives. The contractor days also bring together different partners to share knowledge and exchange best practices.
- **Partner portal:** Via this platform, Fluvius makes information maximally available to partners in the value chain. This includes company knowledge (work instructions, (safety) guidelines, specifications, ...), training offerings, file info with digital job site folders, access to applications, info kiosk for contractors, ...
- **Info kiosk for contractors:** This Fluvius SharePoint environment brings together useful information for contractors. Among other things, you will find: newsletters, newsflash reports on logistics and safety, general information on training, a 'who's who' so you can quickly find your way to the right person, ...
- **Qualification system:** At company level, Fluvius checks its suppliers and contractors to check whether they meet the technical requirements set and respect workers' labour rights.
- **Evaluation system:** Through site supervision and its own evaluation system, Fluvius employees engage directly with workers in the value chain. If a negative impact is identified, registrations can be made through the evaluation systems after which the necessary measures are taken.
- **Direct consultations:** Discussions with suppliers, service providers and contractors are organised as part of contract management and/or market consultations.

Feedback from these channels for consultation with workers in the value chain is taken into account in Fluvius' procurement and decision-making processes. More information on the processes for consulting with workers in the value chain on impacts can be consulted in S2-2.

## Qualification systems

### Supplier qualification system

For suppliers of strategic grid-bound components, a qualification is issued at the company level which guarantees that the materials supplied meet the technical requirements (with regard to the production process and product quality) and that the supplier respects workers' safety and rights. For strategic grid-related components, only qualified suppliers are allowed to participate in tenders. Other utility companies also make use of this qualification, as they too purchase these grid-related components. A qualification is valid for a limited time and is evaluated during contracts. Suppliers can enter the qualification system at any time.

### Contractor qualification system

For contractors carrying out utility works, a qualification is delivered at the company level that guarantees that the works delivered meet the technical requirements (with regard to the execution process and quality) and that the contractor respects workers' labour rights. Each utility has its own requirements for qualification. In addition, separate qualification is also required for earthworks, as many works are done in synergy with other utilities under the Synductis umbrella. For these synergy works, contractors are retained who have qualifications for earthworks and the utilities present on the site.

In addition, all employees in the value chain working on Fluvius' sites will also receive an individual contractor's badge with photo, name and identification number. Linked to this, competences can be obtained after training and successful tests, whether or not via Fluvius Academy, and qualifications can be loaded (legally required certificates/diplomas, always obtained externally and converted by Fluvius Academy into a Fluvius qualification).

## Evaluation systems

Each agreement with suppliers, service providers and contractors includes provisions allowing Fluvius to carry out checks on the materials, services and works supplied.

### Monitoring contracts

Contract management is managing contracts with suppliers, at a strategic, tactical and operational level, with the aim of maximising the objectives of both parties during the execution of the contract. Managing is defined as proactively monitoring compliance with all responsibilities, obligations, procedures, agreements, terms and rates set out in the contract, resolving all ambiguities, inconsistencies and gaps, managing all risks associated with the contract and taking care of desired changes to the contract.

To this end, the necessary roles and responsibilities are assigned per contract so that, in close cooperation with the value chain, a structural follow-up of contracts can be realised with the appropriate frequency.

### Evaluation of suppliers through audits

Within the supplier qualification system, audits are carried out on all potential suppliers that want to be or remain in the qualification system. The focus here is on production processes and the technical quality of the materials supplied, as well as the working conditions of employees in the value chain. The audit is a prerequisite for qualification, but is repeated periodically during the contract phase by way of an acceptance inspection. The content is determined on the basis of a pre-submitted questionnaire supplemented by ongoing issues or questions for the supplier.

## Evaluation contractors through EVA Coaching

EVA Coaching is the unified Fluvius tool for both employees in the value chain (focus on contractors) and in-house staff with three goals:

- **Assess contractors:** how does the contractor perform as a company on various criteria such as safety, technical execution quality, capacity, planning, process efficiency, stakeholder management, ...
- **Assessing contractors' workers competences:** to carry out work for Fluvius, you must be able to demonstrate that you have the necessary technical competences. On the worksites, we check whether a contractor's grid technician has the necessary competences for the technical works he/she is carrying out.
- **Registering site supervision for our own staff:** we supervise all sites, both where employees of contractors and our own staff are working. We register these site visits in EVA Coaching, focusing mainly on safety and also specific questions or themes, which can vary.

The recording of assessments in EVA Coaching serves as input to stimulate growth and development from those determinations. Through simple, clear reporting and dashboarding with a focus on conversation and coaching with the contractor, positive impact is realised by being able to initiate immediate actions and reassess them on an ongoing basis.

## Processes for engaging with value chain workers about impacts [S2-2]

As explained in [Consultation with workers in the value chain](#), regular consultations are organised with workers in the value chain, both directly and through representatives who understand their situation. These consultations take place across the different stages of the procurement process, from market exploration to procurement and during the contract. Consultations such as sector organisations, roundtables, strategic meetings with key suppliers and contractor days are organised at least annually. In addition, continuous consultation channels such as the partner portal, the contractor info kiosk and the qualification and evaluation systems are also available.

The Head of the Purchasing Department (senior management), together with the Director of Grid Management (Management Committee), is responsible for conducting these consultations and incorporating the outcomes into the company's approach. The results of the scheduled consultations are reported periodically to the Management Committee.

Fluvius has not entered into Global Framework Agreements (GFAs) or other agreements with Global Union Federations (GUFs) on respecting human rights of workers in the value chain. In principle, the elements contained in Fluvius' procurement processes cover the necessary risks and avoid, manage and mitigate negative impacts.

Fluvius evaluates the effectiveness of consultation with workers in the value chain within the feedback phase of the evaluation systems set up for suppliers, service providers and contractors and within the evaluation of the overall procurement process.

To gain additional insight into potentially particularly vulnerable workers in the value chain, Fluvius includes companies from the social economy as a specific segment of suppliers. The social economy is also one of the domains in which ambitions are recorded through the Sustainable Purchasing tool (explained in [G1-2](#)). The resulting outcomes and agreements (if any) are included in the overall procurement process.

# Processes to remediate negative impacts and channels for value chain workers to raise concerns [S2-3]

## Channels for value chain workers to raise concerns

Fluvius seeks to maximise detection of negative impacts for workers in the value chain by making various channels available to raise concerns:

- **Own whistleblowing channels:** Any natural person (Fluvius employees and employees in the value chain) who identifies (possible) violations of European Union law in a work-related context can report them, protecting the reporter from retaliation and launching an independent investigation. Fluvius provides internal channels and procedures for this purpose. Reports can be made through an online platform or through a physical meeting at the request of the reporter. Confidentiality is always guaranteed regardless of how the (possible) breach is reported, also for any named third parties.
- **External reporting channels:** One can also contact the Federal Ombudsman as a whistleblower at [www.federaalombudsman.be](http://www.federaalombudsman.be) or [www.mediateurfederal.be](http://www.mediateurfederal.be).
- **Evaluation systems [EVA Coaching]:** In this tool, incidents at Fluvius sites can be registered by Fluvius employees. These can be serious violations that require immediate action, but also multiple negative scores in periodic evaluations. The necessary escalation procedures are provided, both at individual and company level.
- **SPOC contractors:** In this mailbox, contractors can make reports addressed to Fluvius.

Signage is provided on all sites that refers to the Fluvius website. There every worker in the value chain can find the information about the whistleblower channels. Here the confidential nature of these channels is also described in detail. For more information on this, please refer to the [Corporate culture and business conduct policies \[G1-1\]](#). Furthermore, insight is provided into what happens after a breach is reported.

The problem areas raised are always analyzed, both individual incidents through the Deontological Cell and global problem areas through dashboarding in EVA Coaching. Where necessary, mitigating measures are taken. Problem points are also always communicated to the lead officer of the agreement and to the Fluvius Contract Management department. Where relevant, problem points can also be raised at appropriate consultation moments with representatives of Fluvius and the organizations involved.

## Processes to remediate negative impacts for workers in the value chain

Within the evaluation systems of suppliers, service providers and contractors, processes are provided for recovery of negative impacts for workers in the value chain. In supplier audits, actions are taken and/or recommendations formulated where necessary. In contractor evaluations, escalation procedures have been developed to provide remediation. In addition, the overall evaluation systems also provide the necessary opportunities for action.

The lead officer of the contract, together with site coordinators and supervisors, is always responsible for providing redress for negative impacts to workers in the value chain.

By focusing on both regular and continuous consultation with workers in the value chain and their representatives, we aim to keep our finger on the pulse to evaluate the measures taken.

## Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions [S2-4]

Fluvius undertakes several actions with the main objective of achieving positive impacts for workers in the value chain. From the double materiality analysis, the material positive impact appears to be greatest in terms of quality of life at subcontractors through working conditions, job satisfaction and working conditions. Measures and initiatives taken for this are:

- Site supervision
- Safety awareness through communication and training
- Partnership pledge
- ...

The effectiveness of measures and initiatives is monitored and evaluated through the evaluation systems.

To identify what measures are necessary and appropriate in response to actual or potential negative impact on workers in the value chain, Fluvius applies the principles of risk analysis, taking into account the severity and likelihood of the occurrence of negative impact. Measures are taken in line with Fluvius' overall procurement policy. This includes consultation with workers in the value chain, creating involvement in taking measures. We also work closely with industry peers through federal procurement processes and through consultations with industry associations.

The processes to provide or facilitate recovery from material negative impacts are available through the evaluation systems for all Fluvius employees involved and workers in the value chain. Through consultation moments, the effectiveness of recovery processes in their implementation and the outcomes obtained are monitored.

To mitigate material risks due to impacts on and dependencies of workers in the value chain, Fluvius takes the necessary measures. From the double materiality analysis, material risks appear to be greatest in the area of insufficiently suitable contractors and suppliers. Measures and initiatives taken for this are:

- Awarding additional contractors to strengthen power grids
- Investigating contractor and supplier competencies through qualification systems
- Taking actions in critical supplier markets
- Taking advantage of synergies through Synductis and federal procurement
- Focus on collaboration
- Additional consultations with key suppliers

To exploit material opportunities with respect to workers in the value chain, Fluvius is taking certain initiatives. From the double materiality analysis, the opportunities appear to be greatest in synergy with other utility and public infrastructure managers. Measures and initiatives taken for this are:

- Exploitation of synergy benefits through Synductis
- Focus on cooperation (federal procurement, structural agreements, e.g. on digital water meters)

Through proactive consultation with stakeholders and workers in the value chain, Fluvius avoids as much as possible the creation or increase of negative impacts. Should tensions arise around negative impacts, the necessary mitigation measures will be taken in mutual consultation and, where necessary, the policy will be adapted to avoid tensions in the future.

Fluvius aims to develop its collaborative relationships with our existing and new contractors and suppliers into real partnerships. Fluvius has the ambition to become a preferred partner. To make such partnerships concrete, we worked out a 'Partnership Pledge' together with our partners, which was presented to the contractors involved at the Fluvius Contractors' evening in December 2024. In it, we laid down mutual agreements and promises that guide our cooperation. In addition to specifications or legal guidelines, the pledge sets out principles that are clear to everyone, including on our sites all over Flanders.

After several workshops with stakeholders, three general principles were defined:

- We treat each other in a respectful manner
- Good agreements make good friends
- We both reap the benefits of our cooperation

These can be translated into 'the 5 cooperation pledges' in the field (with a clear link to the values of Fluvius):

- Listen actively and always show a constructive attitude
- Build professional relationships: show and earn trust
- We want to serve our joint clients well, flexibly and solution-oriented
- Good agreements make good friends
- We help each other for more quality, innovation and growth

No serious human rights issues or incidents related to the upstream and downstream value chain were reported in the past fiscal year.

Fluvius deploys various profiles that contribute to the management of material impacts related to workers in the value chain:

- Director of Grid Management: create awareness and conduct strategic consultations, feedback to Management Committee
- Department Head of Purchasing: responsible for the entire procurement process, feedback to Director of Grid Management
- Supplier Management: build and maintain supplier relationships, quality assurance through evaluation systems (audits and EVA Coaching), feedback to Department Head of Purchasing
- Sourcing: follow up on tenders for (non-)grid-related purchases, application of regulations in tenders, feedback to Department Head of Purchasing
- Contract Management: follow up on agreements, feedback to suppliers, service providers and contractors during the contract, feedback to Head of Purchasing
- Expertise Purchasing & Competence Center Sustainability: provide specific expertise that unites purchasing processes and sustainability, feedback to Head of Purchasing
- Lead officers, site coordinators, supervisors: follow up on implementation of processes on sites, reporting of violations, feedback to Contract Management



## Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S2-5]

Fluvius does not set specific objectives for managing its material impacts, risks and opportunities regarding workers in the value chain for the time being. Within the framework of contract management, objectives can be set on a contractual basis. Within supplier management, indicators are monitored that provide insight into global developments, but no objectives are linked to them. Examples include the number of audits and inspections carried out, competencies obtained by workers in the value chain at Fluvius Academy, ...



# Affected communities [S3]

The communities where Fluvius operates cover the network operator's operating area. We carry out our activities and works in the public domain, in customers' homes and at companies in all 300 cities and towns in Flanders. In doing so, Fluvius assumes a very important social role, with a predominantly positive impact on the community.

IRO description	IRO type
Provide essential services public infrastructure (sewerage, utilities in public buildings, etc.)	Impact positive
Provide expertise and contribute to public debate	Impact positive
Sense of safety through public lighting	Impact positive

## Interests and views of stakeholders [S3.SBM-2]

As explained in [Interests and views of stakeholders \[SBM-2\]](#), local governments and municipalities, organizations representing energy consumers, and innovation & research institutions have been identified as key stakeholders. They are involved and the interests and views of all are considered in the development of Fluvius' policies.

## Material impacts, risks and opportunities and their interaction with strategy and business model [S3.SBM-3]

The actual and potential impacts identified during the double materiality analysis are purely positive impacts. The provision of essential services and public infrastructure is strongly linked to Fluvius' strategy and business model. The company's core tasks focus on this, see the [Strategic choices of core tasks](#). Changes to the strategy and business model will always be measured against this.

The scope of the double materiality analysis included all possible communities that may experience material impact, including the value chain:

- Communities living or working near operational physical activities (work sites)
- Communities within the value chain, including the ends of the chain
- No indigenous peoples are present in the immediate vicinity of Fluvius' operations

None of these communities experiences a material negative impact.

The material positive impacts stem from Fluvius' core activities and cover the entire operating area, namely all 300 Flemish cities and municipalities. Providing essential services and public infrastructure ensures the realization of the energy and climate transition for all customers and end users. This realization provides us with significant expertise; we share this knowledge through our contribution to the public debate. In addition to a positive impact on the environment of communities, a social contribution is also present. With our public lighting, we provide a sense of safety on the public domain in Flanders.



# Policies related to affected communities [S3-1]

## General policy

The communities on which Fluvius has a material positive impact are in the public domain in Flanders and among the stakeholder group of consumers and end users. For the latter group, the policy regarding this community is referred to [Policies related to consumers and end-users \[S4-1\]](#). The policy regarding affected communities is monitored within the Grid Management and Customer Service directorates.

No material impact was identified for affected communities in the value chain. While Fluvius' human rights policy will not compromise on human rights principles as formulated in frameworks such as the UN Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, the International Labor Organization's (ILO) Core Labour Standards, OECD guidelines and national legislation and policy frameworks, even for communities. In doing so, we affirm our responsibility to respect and promote human rights as endorsed in our [Statement on due diligence \[GOV-4\]](#).

## Our presence in the public domain

Fluvius is present on the public domain with a significant portion of its utility infrastructure. Many of our assets are constructed and managed on land owned by regional and municipal property managers. To regulate this presence, specific regulations apply that define our rights and obligations. Among other things, the Energy Decree contains provisions that, on the one hand, justify our presence and, on the other hand, may oblige us, for example, to move cables and pipelines, if necessary, for works of public utility. As a network company, we are aware of the impact of our infrastructure on the public domain. We are therefore committed to managing this presence appropriately, and we take advantage of opportunities to make our environment more functional, greener and more sustainable.

In recent years, we have observed a significant change in how domain managers want to design and manage their public domain. Climate adaptation initiatives, energy transition, digitization and certain societal trends are contributing to increasing pressure on the use of the public domain. The number of parties wishing to use the public domain has increased steadily in recent decades, reinforcing the need for regulations, guidelines and mutual agreements. For Fluvius, it is therefore essential to actively pursue good cooperation with domain managers and other stakeholders in

the public domain. Here, we consider it important to limit the nuisance caused by utility works, to support initiatives for more green and blue, to take advantage of opportunities for multiple use of space and to always put the societal optimum first when making certain choices.

- **Limiting Nuisances:** Utility infrastructure construction and maintenance works always involve nuisance and inconvenience. We strive to minimize this nuisance by, among other things, proper planning and information exchange from the design phase of projects, maximizing construction in synergy with other network companies, applying appropriate construction methods in the execution phase, establishing adequate communication with citizens, and proper follow-up and supervision of the works.
- **Green & Blue initiatives:** We support initiatives for more green and blue in public spaces. Green stands for more trees and public greenery, while blue refers to managing rainwater through local reuse, buffering and infiltration. For municipalities where Fluvius is the sewerage manager, we not only simply support this, but also actively pursue it ourselves and participate in new developments for sustainable design of public space.
- **Multiple Use of Space:** We support finding solutions for the multiple use of the same space. The available space between the public road and the building line is often too limited to accommodate all the requested functions (soft shoulder or water infiltration, bicycle path and/or footpath, public green space, and utility infrastructure,...), making multifunctional use of the same space necessary. For example, we participate in pilot projects in which our utility lines are laid in concrete pipe ducts that also serve as buffers for rainwater and infiltration, and form part of the roadway, bicycle path or footpath at the top.
- **Societal Optimum:** When designing and managing the public domain, many interests of different stakeholders play a role. Fluvius strives to always choose the societally optimal solution, taking into account the interests of multiple parties. This may mean that we sometimes make a choice that is not the ideal scenario for us as a network company, but which does contribute to a higher societal interest and a sustainable design of the public domain.

## Providing essential services and public infrastructure

Providing essential services and public infrastructure is a core task within Fluvius' business model. Fluvius' mission is to sustainably connect Flanders with its multi-utility networks, where energy and sewerage are basic rights of the population and society.

Within these essential services, Fluvius strives for high reliability of the networks and the development of smart data and infrastructure. The approach and principles for this are further explained within the entity-specific themes of [Network reliability \(ES1\)](#) and [Smart data and infrastructure \(ES2\)](#).

## Providing expertise and contribution to public debate

The realisation of the energy and climate transition in Flanders gives Fluvius, as a grid operator, unique insight and in-depth expertise. We want to share this knowledge, inside and outside the company, with all (key) stakeholders and through various channels. The expertise and contributions provided always fit within Fluvius' mission and vision. As our network reliability strategy also states, we are committed to rational consumption, renewable energy and circular use of water, future-oriented networks and systems that offer opportunities for active users.

Through the website, communication campaigns and consultations, we inform partners, individuals and companies about current topics. In addition, we participate in platforms, networks, working groups to actively share our knowledge while learning from others.

## Sense of safety through public lighting

The public lighting, which Fluvius manages in all 300 cities and municipalities in Flanders, has an impact on the sense of safety in the public domain. In consultation with local authorities, Fluvius draws up a master plan in the context of the past, with the strategy 'The right light in the right place, at the right time'. This takes into account, among other things, the sense of safety provided by public lighting. On the basis of dialogue and design guidelines, a proposal is validated with the various stakeholders that provides a balance for all aspects.

The LED conversion plan is a lever for Fluvius' positive impact on the sense of safety. The lighting points are in fact equipped with a smart control system that can be set dynamically, allowing optimisations to be implemented quickly.

## Processes for engaging with affected communities about impacts [S3-2]

Given that the communities on which Fluvius has a material positive impact are in the public domain and among customers and end-users, reference is made to the [Processes for engaging with consumers and end-users about impacts \[S4-2\]](#). for the processes for consulting with communities on impacts.

In these processes, the views of communities are included in Fluvius' activities aimed at managing material impacts on communities. In doing so, Fluvius proactively and regularly engages with communities directly, e.g. through the customer community, and through official representatives, e.g. from key stakeholders such as interest groups. The function within the company that has operational responsibility for ensuring that these consultations are conducted and that their outcomes are taken into account in the company's approach is the director of the Customer Services Department.

## Processes to remediate negative impacts and channels for affected communities to raise concerns [S3-3]

Given that the communities on which Fluvius has a material positive impact are in the public domain and among customers and end-users, reference is made to [S4-3](#) for remediation processes for negative impacts and channels for communities to raise concerns.

Concerns can always be raised through Fluvius' grievance mechanisms and whistleblowing channels. When negative impacts are identified, the necessary mitigating measures are taken through the complaints process, with associated escalation options, and followed up by the responsible person(s). No separate channels were set up specifically targeting communities. The existing channels for raising concerns for people in the public domain, customers and end-users are made publicly available on the Fluvius website. The contact details of the call centre De Stroomlijn are visible when working in the public domain and are shared with the customer or end-user concerned in every customer communication.

Using measurements of customer satisfaction for the various customer-oriented processes, we evaluate Fluvius' performance with a representative group of customers.

When concerns are made known through the whistleblower channels, individuals are always protected from reprisals. More explanation is available in [Corporate culture and business conduct policies \[G1-1\]](#).



## Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions [S3-4]

Given that the communities on which Fluvius has a material positive impact are in the public domain and among customers and end-users, for the measures and effectiveness of these initiatives with the main objective of achieving positive impacts for communities, see [Acting on material impacts on consumers and end-users \[S4-4\]](#) en [Network reliability measures](#).

Measures as part of the management and development of our multi-utility networks must always meet the following conditions:

- They must preserve the comfort of grid users
- They must be socially responsible
- They must be environmentally responsible
- They must be financially realistic
- They must be technically feasible

In this way, Fluvius avoids causing or contributing to material negative impacts on communities through its business activities. In addition, the Code for infrastructure and utility works along municipal roads of the Flemish Association of Cities and Municipalities (VVSG) is always followed.

This code aims at:

- The quality execution of works (including point works) in the public domain
- Informing the domain manager about point works and the timely exchange of all necessary information between the relevant cable and pipeline operators, utility companies, domain managers and any other commissioners of works (in the public domain) with a view to coordinating the planning, study phase, execution and follow-up of works by those involved
- Coordinating the execution of works for which mutual commitments were made during the study phase
- The smooth and fast execution of the works, in order to limit as much as possible the nuisance and the duration of the works in balance with the necessary safety measures and other accompanying measures

- The prevention of works during the closed period after the execution of the works with a view to less nuisance and sustainable management
- The timely and correct communication with local residents and road users
- The efficient follow-up of notifications and complaints related to the works (including aftercare)
- The establishment of common agreements that apply in all cities and municipalities that subscribe to the code and a uniform application of these agreements.

Specifically for network planning, acquisition and operation of land and control of environmental impacts, applicable regulations are applied in Flanders.

No serious human rights incidents related to affected communities were reported in 2024.

## Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S3-5]

Given that the communities on which Fluvius has a material positive impact are in the public domain and among customers and end-users, the targets in terms of promoting positive impacts are referred to S4-5.

In terms of affected communities, no specific targets are defined for promoting positive impacts. A positive evolution of customer satisfaction remains a good indicator for this. In addition, the satisfaction of [key] stakeholders is qualitatively monitored through the predetermined involvement of these partners. Where relevant, they are involved in setting targets, monitoring performance against targets and identifying any lessons or improvements resulting from the company's performance.



# Consumers and end users [S4]

Whoever calls on Fluvius, we offer a service that responds smoothly to the customer's needs and expectations. This is what we aim at for the approximately 6.8 million inhabitants of Flanders and all 300 Flemish cities and municipalities.

IRO description	IRO type
Emergency and social supplier of gas and electricity	Impact positive
Offering services for the benefit of vulnerable customers and social customers (e.g. free energy scan)	Impact positive
Increasing comfort/quality of life by offering real time data	Impact positive
Rational grid use should benefit customers	Impact positive
Managing affordability by working closely with regulators and public policymakers on tariff structures	Impact positive
Ensuring affordability of utilities through efficient construction and operation of networks	Impact positive
Safeguarding customer data privacy	Impact positive
Delay in processing customer data, slow and rigid processes in customer support and problems with software in customer support	Impact negative

**79.44%**  
Customer satisfaction

## Interests and views of stakeholders [S4.SBM-2]

As explained in [Interests and views of stakeholders \[SBM-2\]](#) , local governments & provinces and organisations representing energy consumers have been identified as key stakeholders. Companies are represented in employer organisations and households in consumer organisations. Moreover, within its strategy, Fluvius explicitly states the pillar 'Customer centric'. This involves customers and includes the interests and views of all in the development of Fluvius' customer policy.

The rights of customers and end users are respected and clearly defined in the regulated framework of Fluvius' activities. The regulator is tasked with monitoring respect for these rights.

# Material impacts, risks and opportunities and their interaction with strategy and business model [S4.SBM-3]

The impacts on customers and end-users as identified in the double materiality analysis are directly traceable to Fluvius' strategy and business model through the strategic pillar "Customer centric".

Fluvius' customer segments are<sup>1</sup>:

- Private customers
- Social clients
- Companies
- Local governments

The identified impacts included in this reporting are valid for all clients, except those where clients are specifically mentioned as social, vulnerable clients or where Fluvius acts as an emergency supplier.

For social, vulnerable clients, the appropriate involvement of both the clients themselves and partners that Fluvius works with in these specific processes for social clients is used, so that their views and interests can be taken into account in Fluvius' policies and processes.

The negative impact of 'Delay in processing customer data, slow and rigid processes in customer support and problems with software in customer support' has a link to specific systems and processes of Fluvius rather than a specific customer segment. Fluvius has to respect legal lead times for certain tasks. Due to various influencing factors, delays in these lead times can sometimes occur.

In the double materiality analysis, mainly positive impacts were found to be material, an effect of our clear focus on 'Customer centricity'. We apply this to all Fluvius activities and continuously translate it into all processes. All customers in Fluvius' operating area are positively impacted by this.

<sup>1</sup> *These customers are not impacted by Fluvius products that are inherently harmful to humans and/or increase risks of chronic illness. In addition, the right to privacy, protection of personal data, freedom of expression and non-discrimination are always respected. Customers who depend on accurate and accessible information on products and services, such as manuals and product labels, to avoid potential misuse of a product or service are informed through customer communication channels. Customers who are particularly vulnerable to health or privacy impacts or to impacts of marketing and sales strategies, such as children or financially vulnerable people, are protected through awareness campaigns.*

# Policies related to consumers and end-users [S4-1]

## Customer vision

Fluvius' vision is "Customer centric". This is one of Fluvius' five top priorities for 2024. A customer is a party that makes itself known and purchases, consumes or shows interest in a product (good or service) from Fluvius.

We interact with our customers as one company, where we can unambiguously link the same customer to all its products and associated files. Under the Fluvius brand name, we incorporate multiple roles with different products, as explained in [Strategy, business model and value chain \[SBM-1\]](#).

In everything we do, we put our customers first and ensure smooth, high-performance and reliable services. Many trends in our society mean that we can no longer think only from our processes, but should always start from the customer's point of view. Fluvius wants to work on these trends and realise that by 2026 every employee will think and act 'Customer centric'. Fluvius must be able to offer a *one-stop shop* for customers. A simple and pleasant solution or answer together with Fluvius' products and services will increase customer satisfaction and, on the other hand, reduce customer contacts and complaints. We aim for a customer satisfaction score of 79%.

The **customer service service pledge** consists of these elements: every employee is at your service, we know you and your situation, we provide you with comprehensible info and personalised advice.



## Four-track policy

Fluvius uses a four-track policy to realise this customer pledge:

- Channel strategy
- Processes
- Systems
- Employees and culture

### Channel strategy ACCF 2.0

The channel strategy ACCF 2.0 refers to the Avoid, Click, Call, Face principle and its aim is to help customers through the most suitable channel.

- **Avoid:** 'First time right' through customer-oriented processes and an easily accessible communication, so that unnecessary contacts can be avoided
- **Click:** 'Selfservice' via 24/7 applications such as mijn.fluvius.be and the website's chatbox
- **Call:** Synchronous communication via telephony (De Stroomlijn) and social media messages in the case of dangerous situations and/or specific target groups, with a view to the accessibility for the customer
- **Face:** 'Face to face' contact at the customer offices or with the relationship manager for complex matters, taking into account specific target groups, with a view to accessibility (without appointment)

We are building [mijn.fluvius.be](#) into the digital self-service tool for the digital customer. For this, we are betting on tailor-made information for the customer and thus implement the customer service pledge: each employee is at your service, we know you and your situation, we provide you with easily accessible information and personalised advice.

Our objective is that no customer should turn to other services but the self-service portal [mijn.fluvius.be](#). For this purpose, we provide in a comfortable user experience so that the customers only want to use [mijn.fluvius.be](#) and customer satisfaction increases.

The portal evolves along the customer's wishes. The portal is customer-driven (outside-in):

- We capture customer data make the portal evolve based on customer behaviour (including experiments with customer data).
- Swift reactions to behaviour and trends are crucial for a successful portal.
- We aim at mass customization tailor-made for the customer, automatically based on data (consumption deviations, connection capacity)

## Establishing processes

The needs and expectations of the customer are at the basis of each process. Existing processes are analysed and amended frequently by making use of one-click survey insights, complaints and an annual customer satisfaction survey. In new processes customers are involved and the starting point is the customer's perspective. Based on the results of market research (surveys, focus groups,...) and on the basis of the customer life cycle analysis (elaborated customer journeys) processes and product are developed.

All customer interactions are registered in a central ticketing system. For monitoring these interactions, SLA's are being set with the relevant internal and external contributors to and surveyors of the customer process.

## Systems

We need the right supporting data and systems in order to process customer contacts as efficiently as possible. We aim at a knowledge database with uniform answers across the channels and departments. Beside that, we also work on a customer management system (CRM) for the registration of all customer data and interactions, irrespective of the channel or department, with the objective to create a single central and unique customer file with a 360° view.

## Employees and culture

For the realisation of 'Customer centric', being one of the five Fluvius values, several actions are taken to make sure that each Fluvius employee thinks 'customer centric' in his/her daily job operations.

## Repairing negative impacts

When the customer communication and interactions do not provide a sufficient answer to the customer's request, the customer can at all times file a complaint. Customers can file a complaint through different channels. These processes are further commented on in [S4-3](#).

## Human rights policy

Fluvius executes a human rights policy based on frameworks such as the UN Guiding Principles on Business and Human Rights (UNGP's), the International Bill of Human Rights, the fundamental labour norms of the International Labour Organisation (ILO), OECD guidelines and national legislation and policy frameworks. No concessions are made on these human rights principles. In this way, we confirm our responsibility to respect and promote human rights as described in our [Statement on due diligence \(GOV-4\)](#).

Our human rights policy directly contributes to the management of material impacts, risks and opportunities related to our consumers and end users. Fluvius has set up policies and processes to stay in dialogue with consumers and end users, our customer pledge clearly states this. Besides, we frequently consult with customers to take their interests and views into account for our activities. Fluvius has also set up confidential [channels](#) to offer the possibility to raise concerns or complaints. Fluvius guarantees anonymity, confidentiality and independence, while enabling quick and suitable measures.

In the financial year 2024 no incidents related to human rights policies were reported.

# Processes for engaging with consumers and end-users about impacts [S4-2]

## Consultation with customers

In processes to consult with consumers and end users about impacts customers' views are taken into account for Fluvius' activities, targeting the management of material impacts on consumers and end users. Fluvius proactively and frequently engages in consultation with its customers, e.g. through the customer community, and through official representatives, e.g. of key stakeholders such as advocacy groups and organisations representing energy consumers. Companies are being represented by employers' associations and households by consumer organisations. The person who is responsible within the company for the operational responsibility to ensure this consultation process and the results being taken into account in the company's approach is the managing director of the Customer Service Department.

## Customer satisfaction survey

Customer satisfaction is monitored in a bi-monthly survey by an external partner. The results of this customer satisfaction survey (CSS) are monitored in dashboards, where the results for each separate process can be consulted. For each individual process, a selection of customers who have had contact with this process in the recent past, has been made. The processes thus surveyed are:

- Applying for a premium
- Disruptions
- Prepaid
- Connections
- Studies and construction
- Metering
- Local production

## Co-creation with customers

Via permanent feedback loops Fluvius is in co-creation with the customer for the development of new products, tools, digital solutions and so on. This includes qualitative customer surveys in which we go through the entire customer journey. The positive aspects, as well as the difficulties or stumbling blocks during the interactions with our services are mapped. We also have open dialogues at the start of new projects so that we can take the customer's needs into account in the further analysis of the project. The Fluvius customer community is a group of 250 customers who are available at all times to give their opinion with qualitative and quantitative feedback on all kinds of topics, which results in very short processing times. Our customers test new applications as well as the information provided on our website. What information are our customers looking for and how do they want to receive this?

## Informing the customer

Campaigns on existing and new possibilities, providing tailor-made products and communication, providing adapted webpages and correct information from customer agents and employees at the customer contact centres, these are all processes contributing to proactively informing the customer. This happens through several channels, aligned with our channel strategy.



## Customer journeys

To gain insight in the customers' life cycle, customer journeys are elaborated at the customer experience team.

The life cycle of a **residential customer** will begin at the moment of becoming independent until the moment of decease.

- At becoming independent the customer needs a removal document or energy delivery takeover document.
- When buying a car the request for a charging point is made.
- When the family's composition changes, a renovation coach can sometimes appear or premiums requests are launched.
- In the case of financial problems for a residential customer we can offer the following: social tariffs, prepaid, energy scan, installment plan, minimum supply, info sessions with the Social Services and discount vouchers for electric appliances.
- In the case of building or renovating the following is a possibility: neighbour premiums, renovation coach, premiums, technical visit onsite, energy-fit session, info sessions and energy consultants.
- There are a number of recurring activities during which the customer is in contact with Fluvius. More specifically, this is at the moment of requesting for a meter reading, consumption information and history, the online public lighting notifier. But also signing posts, the outage line and (un)planned works.

At key moments such as building/renovating, buying an electric vehicle, changes in family composition, or removal customers will expect tailor-made advice; some will want to co-create with Fluvius consultants. A growing segment of customers has the ambition to maximise auto-production and/or want to connect to a district heating grid or an energy community. The advice, the monitoring of consumption, and interactions in this respect needs to be digital, super simple and personalised.

For customers with Fluvius as their **social supplier**, there is a social interest and together we will look for a solution. To be more precise, we are dealing with the residential drop or the end of a residential contract. The contract has been terminated by the commercial supplier due to payment delays. We act at the standard tariff for non-protected customers and at the social tariff for protected customers, through traditional monthly billing or through prepaid. If customer make new debts at the social supplier, they are obliged to work with prepaid. When the financial problems persist, the [LAC \(Local Advice Committee\)](#) (Social worker from the Public Centre for Social Welfare,

<sup>1</sup> [Bijzonder Comité Sociale Dienst - Special Committee Social Service](#)

mandated officer BCSD<sup>1</sup> and a Fluvius employee) are involved, they carry out a social investigation, try to find a solution and takes a decision in consensus about whether or not to cut off energy supplies if no solution is found.

**Locale authorities** are Fluvius customers as well. Their life cycle starts at the Mayors' Covenant and the changing of the guard of the administration of the city or municipality. For energy savings ESCO services for local authorities are being offered. There is also the opportunity of energy sharing. In allotments, utilities and public lighting have to be installed. We offer studies and there is a temporary connection at construction sites. In the case of infrastructure works, studies construction and public lighting is involved. One can also count upon the recurrent activities of Fluvius, such as meter reading, the outage line, consumption information and history, online public lighting outage notifier and signalling.

For events under our own management and larger projects (allotment, infrastructure and mergers) the local authorities expect that Fluvius will assist the project professionally and proactively deliver expertise and advice, in short a partner in co-creation. Sustainability is an important factor in each choice that has to be made.

## Customer satisfaction at the subsidiaries

Our subsidiary De Stroomlijn also highly values the satisfaction and feedback of their customers. Customer satisfaction is at the heart of their organisation as Fluvius' customer contact centre. They organise frequent customer surveys according to the CSAT-score method in a one-click survey at a daily random sample of 600 customers that have been in contact with one of their customer advisors. Next, conversations that got a highly negative CSAT-score can be relistened by the advisor and his/her team coach. Listening to customer conversations is an integral part of the performance cycle of customer advisors at De Stroomlijn.

## Processes to remediate negative impacts and channels for consumers and end-users to raise concerns [S4-3]

To cater for or to collaborate in the remediation for negative impacts on customers Fluvius sets up channels to raise concerns. It guarantees the necessary monitoring. The channels it provides are:

- Customer contact centre De Stroomlijn by telephone
- Online complaint tool
- Functional mailbox for complaints
- Whistleblower channels

At Fluvius, a complaint is defined as a statement of dissatisfaction by an external party about Fluvius, its services and/or products. We see every notification as an opportunity to optimise our products, our services or our processes. When a negative impact is registered through the complaint process, with the appropriate possibilities for escalation, the necessary mitigating measures are taken and monitored by the responsible person(s). The complaints we receive are assigned to the responsible team based on the content of the complaint. In processing the complaint we distinguish between first-line complaints, initial notifications by the customer and second-line complaints, escalations by the customer at the occasion of a prior complaint.

The channels to raise concerns are publicly available on the Fluvius website. The contact details of the call centre De Stroomlijn are indicated at construction sites on the public domain. And every customer communication is shared with the customer or end user involved. When concerns are flagged through the whistleblower channels, individuals are being protected against retaliation. More details in [G1-1](#).

In every operational team at Fluvius employees are appointed with the responsibility for handling complaints as part of their job. This is a deliberate choice. In doing so, we as a company want to make sure that several employees in a team keep in touch with the customer, experience what goes well and what not, and are able to initiate improvement proposals to improve the operations for the customer. We at Fluvius call complaints handled by these employees **'first-line complaints'**.

Fluvius has a specific team responsible for the following tasks:

- Assigning complaints to the right operational team and monitoring the complaints
- Quality check of the complaint handling
- Analysis of the complaints and formulating advice on adapting products, processes ...
- Act as an advisory body for handling complex files
- Handling complaints that have been escalated, complaints about employee behaviour or that have been filed at public authorities such as the Flemish Ombud Service, the Federal Ombud Service, the energy regulator ...

These complaints handled by our colleagues are labelled **'second-line complaints'** at Fluvius.

All complaints we receive are analysed thoroughly. The customer receives a message from Fluvius indicating the analysis and the solution that we can offer. Paying out a financial compensation can be part of the solution. This can be carried out by rectifying the situation, e.g. by crediting a cost we invoiced or by allowing a compensation for the consumption. On the other hand, a customer can be allowed a compensation for 'non-qualitative service delivery'.

Each year, Fluvius publishes a report with the annual analysis of the complaints. In this report, Fluvius presents a detailed overview of all complaints received. Last year, Fluvius received 36,330 complaints.

## Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions [S4-4]

In 2024, Fluvius took the following actions to manage the negative material impact and to promote positive impacts.

- **Starting up co-creation:** together with customers, new products are extensively tested, in order to start new initiatives from the viewpoint of and in collaboration with the customer.
- **Customer contact by phone after a complaint:** in the previous system, a complaint filed online was managed through a functional mailbox which was monitored internally by employees. Monitoring often took the form of digitally asking additional questions to the customer who had filed the complaint. This sometimes resulted in long process times for these complaints. To solve this, we started to contact the customer by phone after he has formulated a complaint. The first results indicate that 50% of the complaints, questions or remarks can be solved with one single phone call.
- **Continuous evaluation of the SLAs:** we have agreed upon SLAs (service level agreements) with several counterparties to keep customer contacts as short and as efficient as possible.
- **Actions on eliminating blocked EANs:** to eliminate the delay of blocked EAN codes due to the migration of the Atrias platform, we carried out a thorough investigation into the various reasons for blocking. Wherever possible, we took action to eliminate the blocking as much as possible. In those cases where this was not successful, further individual investigations are being carried out and those cases of blocking will be solved on an individual basis.

- **Raising awareness:** Fluvius has carried out several awareness campaigns to proactively inform customers about their legal obligations (such as notifying their solar panel installations and charging infrastructure on private property), to avoid negative impacts in the future for customers and for the grid reliability.
- **Customer centric team trajectories:** Teams at Fluvius can get to work together to put the customer at a central position in their processes. A toolbox was developed for this purpose, in which one gets to know the customer better, information on customer-oriented action and communication is shared and improvements for the customer can finally be identified. Afterwards, teams can draw up their own customer charter based on their trajectory.
- **Redesign complaints process:** To increase Fluvius customers' satisfaction and reduce the number of complaints, the complaints process was transformed according to the principles of "Customer centricity". The new customer process was launched in 2024 and will be further scaled up in 2025.

The effectiveness of these measures is monitored using the measures defined in [S4-5](#). Monitoring these measures also ensures that no negative impact is caused by the conduct of Fluvius' operations.

No serious human rights incidents relating to consumers and end-users were reported in 2024.

## Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S4-5]

### Fluvius aims for a customer satisfaction score of 79%

Customer satisfaction is measured bi-monthly among a wide selection of consumers and end-users. In collaboration with an external agency, this 'Customer Satisfaction Survey' charts four scores:

- **Customer satisfaction (CSAT):** This score indicates the percentage of surveyed customers who are satisfied with the process.
- **Net promoter score (NPS):** This score indicates the extent to which customers would recommend our service to others.
- **Customer effort score (CES):** This score measures the extent to which customers feel they have to make an effort to go through a process.
- **Company effort score (CoES):** This score measures the extent to which customers feel Fluvius makes an effort on their behalf to make the process go smoothly.

These four scores are measured at the process and channel level, as explained in S4-2. With these results, Fluvius can work very concretely to identify improvement actions and follow up on the effectiveness of these actions.

In 2024, Fluvius' customer satisfaction score was 79.44%.

As mentioned earlier, De Stroomlijn also uses customer surveys to measure customer satisfaction among customers who have contacted the contact centre. These surveys are done daily to a random sample of 600 Fluvius customers who had contact with De Stroomlijn. In 2024, De Stroomlijn's CSAT score was 84.96%.

### Timely execution of core tasks

To achieve higher customer satisfaction, timely execution of our core tasks is essential. This is monitored through lead times on the various processes such as:

- Connection works
- Payment of premiums
- Timely installation of digital meters after notification of local production
- Timely sending of metering data
- Intervention speeds
- Performance of customer contacts

### Every Fluvius employee thinks and acts 'Customer Centric'

Within Fluvius' strategic commitments, the ambition is to make every employee think and act according to the "Customer centric" vision. The Great Place To Work survey is a lever to interrogate this perception annually and monitor the effectiveness of actions such as team trajectories and applying the CX methodology.



# Network reliability (ES1)

At Fluvius, network reliability is at the heart of our mission to deliver sustainable and reliable services to our customers. In this chapter, we discuss how our asset management principles contribute to the reliability of our multi-utility networks, including electricity, gas, heat, sewerage and public lighting.

Our approach is based on an integrated asset management system that aims to optimise the lifetime and performance of our infrastructure in their environment. By using digital models and data analytics, we can proactively plan and execute works, minimise outages and maximise the efficiency of our networks.

**25 min 5 sec**  
Customer Minutes Lost electricity

**86.30%**  
Voltage Load Indicator

**60.87%**  
LED conversion rate

IRO description

IRO type

Societal wealth creation through security of supply

Impact positive

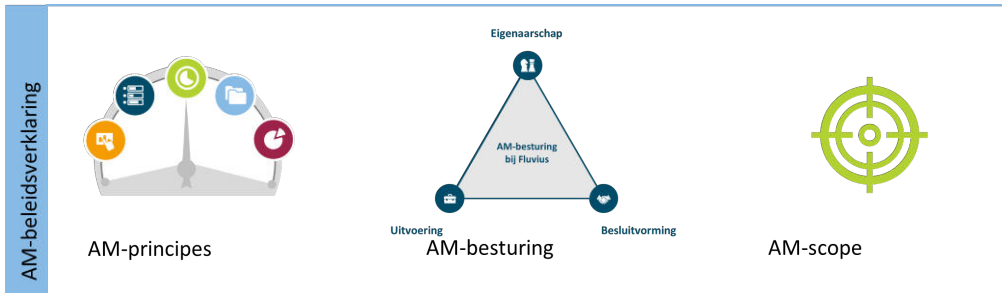
# Asset management policy

Fluvius aims to optimise available resources to manage its multi-utility infrastructure through good asset management (AM). This is the decision-making framework for our assets. It determines how we make choices about our assets. It is a translation of strategy into asset policy with a view to high network reliability and it is elaborated in the strategic asset management plan. This bases itself on the principles of ISO 55,000.

The **AM policy statement** lays down the rules of the game and the playing field while, on the other hand, the AM choice model is more of a guide to the balancing act that needs to be done every time asset choices are made.

The AM policy statement includes the following elements:

- What are our principles (AM principles)?
- Who plays what role in the steering process (AM steering)? Who determines the chosen direction, who decides on the use of available resources, who reviews feasibility to implementation and how do these roles challenge each other?
- Where do we apply the AM framework (AM scope)?

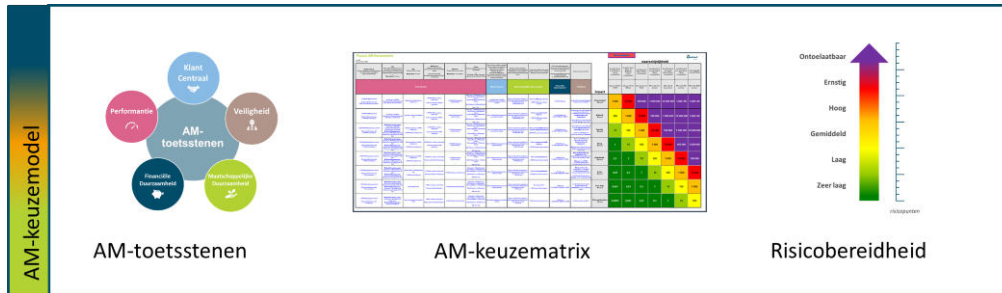


The **AM principles** are rules/agreements that always apply:

- **Value-based:** no decisions based on gut feeling, but on the AM selection model as well as on numerical data.
- **Pragmatic with laws and regulations:** when implementing laws and regulations, we look at the spirit of the law as much as possible, so that we can achieve the purpose of the law as much as possible. Where necessary, we enter into a dialogue with the law/regulator.
- **The full life cycle:** it is important that not only the investment, but also the maintenance and demolition - the full life cycle - are taken into account in a decision.
- **Standard solutions:** we always look first at possible standard solutions available on the market. Only if these are not available will we resort to customisation, for example. We apply this solution throughout Fluvius.
- **System perspective:** By looking more broadly and thus at the entire system, we can use the networks more efficiently.




The AM choice model involves a balancing act. A balance between touchstones that indicate what is important to Fluvius in the decision on the one hand and acceptable risks on the other. But also when considering opportunities and improvement potential, choices have to be made for which the touchstones are then used. In this way, we can also transparently and uniformly communicate why we make certain choices and what balance we achieve in doing so.



The AM choice matrix ensures that the balancing exercise with the touchstones is done as objectively as possible. Levels of impact are defined for each touchstone. The frequency is also estimated. Impact and frequency lead to insight into the risk, making it possible to check objectively whether not too much risk is being taken on the one hand or too cautious on the other.

Asset management results in an asset policy. This includes design, investment, maintenance and rehabilitation guidelines for the optimal development of our multi-utility networks. In doing so, we base ourselves on (inter)national standards and the best available techniques. The aim is always to get maximum impact from the available resources.

A reliable network balances the five AM touchstones.

- 
Performantie
De mate waarin we met onze assets onze **taken vervullen** en blijven vervullen met de afgesproken **kwaliteit**
- 
Klant centraal
De mate waarin we de **evoluerende noden** van onze verschillende klanten en belanghebbenden **afdekken** en dus het aanbieden van moderne utiliteitsdiensten
- 
Veiligheid
De mate waarin we de **gezondheid** van personen **beschermen**, tegen dreigingen door onze activiteiten, onze assets en de fluida die erdoor stromen
- 
Maatschappelijke duurzaamheid
De mate waarin we **maatschappelijk verantwoorde keuzes** maken, die rekening houden met milieu en sociale aspecten
- 
Financiële duurzaamheid
De mate waarin we onze **middelen verantwoord inzetten**, en wel over de volledige levensduur van onze assets

These touchstones work like communicating vessels. If you change something in one touchstone, it affects one or more other touchstones, either positively or negatively. It is of utmost importance to always keep these in balance.

## Strategy for network reliability

As mentioned in the chapter related to [Strategy, business model and value chain \(SBM-1\)](#), Fluvius aims to sustainably connect society with our multi-utility networks. Here, we understand 'sustainable' to include 'reliable'. Each utility has its own strategy to put this into practice, but there are also some common concrete conditions that all ideas and plans in the context of the Flemish networks of the future must meet:

- They must preserve comfort for grid users
- They must be socially responsible
- They must be environmentally responsible
- They must be financially realistic
- They must be technically feasible

Across all utilities, Fluvius sees four main objectives or 'axes':

- We help to reduce energy and drinking water consumption
- We make renewable energy and circular use of water maximally available
- We make Flemish grids 'future-proof'
- We create new opportunities for active users

As a grid operator, we need to work on this to enable climate neutrality in 2050. Fluvius wants to help the Flemish government, local authorities and households and companies with this in the coming decades.





## Electricity: "No regret"

The electricity network must be strengthened in line with expected evolutions and policy. For the long-term assumptions, we base ourselves, among other things, on the ambitions in the Flemish Energy and Climate Plan:

- A complete electrification of passenger transport
- The use of residual heat with heat networks
- A rising trend in the electrification of freight transport
- The electrification of heating in new buildings and in thorough renovation of buildings
- An acceleration of growth in solar and wind energy
- A rising electrical consumption and increasing peak loads in industry.

This gave rise to several scenarios, each having its own impact on the networks. On this basis, the Investment Plan was drawn up for the next ten years. This is an iterative exercise in which, every two years, the assumptions and the assumption of evolutions in consumption and policy will be reviewed to see if they are still valid for the scenarios. This will be done in collaboration with the various stakeholders.

With the assumptions mentioned above, there are still many scenarios conceivable in terms of the scope and speed of electrification. The future is uncertain, we do not know which scenario will become reality. We can, however, identify the necessary additional 'no regret' investments for a wide fork of scenarios:

- Which must be implemented at a sufficiently high speed (before 2033) in order not to run into problems;
- Which are certainly not superfluous as a function of the electrification we expect by 2050, even if we can limit the impact of electrification on the peak load of the grid and the investment requirement with all kinds of mitigating measures (capacity tariff, flexibility);
- Which take into account spatial planning: the future filling in of the public domain helps to make a correct technical dimensioning of the grids;
- Which seek maximum responsible synergy with other works on the public domain.

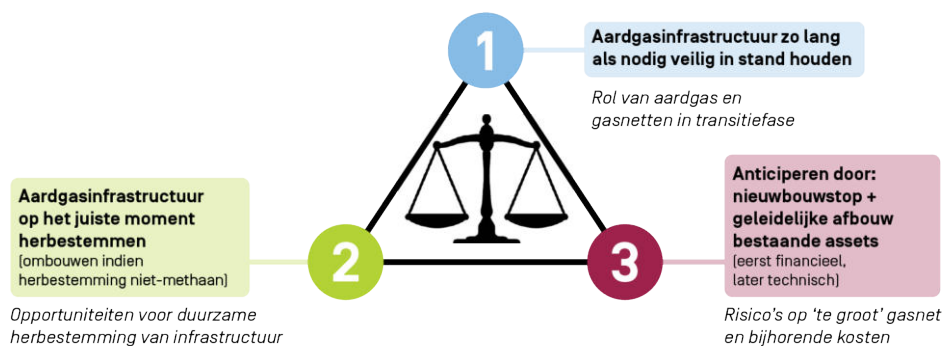
The full [Investment Plan 2024-2033](#) can be consulted on our website. This plan also includes our vision of flexibility, which is also discussed further in this report in section [Smart data and infrastructure](#) [ES2].

To promote network reliability, several strategic measures are being taken:

- Planning and design of high- and low-voltage distribution networks according to proactive investment policies
- Digitisation of the electricity distribution network as a function of
  - Better network management of individual assets, the electricity system and more efficient performance of operational tasks
  - Construction of critical mass of digital assets in the network and the roll-out of digital meters and cabins
  - Integrated data platform as a foundation for unlocking data from different sources
- Better utilisation of the distribution network through
  - Dynamic management of networks: ensures better utilisation of existing physical infrastructure. By dynamically managing networks and re-switching them according to load, (temporary) residual capacity becomes visible, deployable or better utilised.
  - Tariffs: a more cost-reflective tariff such as the capacity tariff stimulates end-users to spread consumption or align it more to their own production and thus self-consumption.
  - Market-based flexibility and/or ancillary services: sometimes the grid operator cannot actively adjust unwanted grid situations with its own assets and passive incentivisation of customers is insufficient. Then it is useful to have customers actively contribute at times when grid capacity is insufficient. The choice to participate is free and lies with the grid user.
  - Technical flexibility: participation here is mandatory and driven by the grid operator. We consider technical flexibility only when the deployment of market flexibility proves not to be an option, e.g. in emergency situations or when the purchase of market-based flexibility is not economically efficient.
  - Local automatisms: to deal with very local phenomena, it is useful to have local automatisms built into grid-connected applications. This prevents different customers from being impacted by local phenomena. Moreover, it allows reactive action to avoid local problems in the future. This thanks to other mitigating measures or grid reinforcements.

## Gas: "Keep it running"

For the gas distribution network, we adopt a 'keep it running' scenario. Naturally, our existing gas customers can continue to rely on the gas distribution network. In doing so, we seek a balance between opportunities for sustainable reallocation of infrastructure and financial impact, including the risk of an 'oversized' gas network with the associated costs.



Today, there is no policy framework for phasing out existing gas networks. Within the current legal framework, access to the gas network cannot be denied, with the exception of new major projects and new construction in the future. There is therefore no basis today for providing funds in the Investment Plan for the phasing-out of the existing gas network, nor for the accelerated depreciation of these assets. From Fluvius, we have already anticipated the upcoming legislation by amending our project regulations. In new subdivisions, we will no longer install a gas network since 1 January 2023.

As the gas grid is still used today, Fluvius must guarantee a reliable and safe supply of energy via the gas grid. Our customers will eventually switch to alternatives that fit into a climate-neutral Flanders. For this, the necessary preconditions must be met, such as a higher renovation rate and additional grid investments for heat or electrification.

Customers will still connect to the existing gas network, partly as a result of the phase-out of fuel oil. We still see an increase in the connection rate and no decrease in (residential) gas consumption yet. In the short term, the effect of any additional gas connections will remain limited and insufficiently significant to warrant additional investment. In the longer term, we expect gas (peak) consumption to decline.

Due to the expiry of a number of policy rules and investment programmes (roll-out of digital gas meters, conversion from low- to high-calorific gas), the investment budget for the gas networks will continue to decrease in the coming years. However, these investments are still necessary to ensure safety and maintain operational efficiency.

Current and future investments in the gas distribution network are therefore:

- Necessary to continue meeting customer expectations in a safe, sustainable and reliable manner - among other things to avoid gas leaks - for as long as natural gas is needed;
- Well-considered and framed by a variety of flanking measures such as condition-based maintenance, targeted leakage level measurements, increased pressure monitoring, etc. so that replacement investments are made judiciously and only when necessary;
- Compatible with a possible use for other gases such as biomethane or hydrogen, without making an upfront assumption about the future of the gas grid;
- Focused on reducing methane emissions.

The full [Investment Plan 2024-2033](#) can be consulted on our website.

## District heating: "Sustainable heat, carefree to you"

For phasing out fossil fuels by 2050, in particular natural gas and fuel oil for heating buildings, Fluvius puts forward two options: connection to a heat grid or electrification through heat pumps. Heat networks can help relieve the electricity grid, as they can (partly) avoid the supplementary power demand of the alternative. Fluvius gives the highest priority to unlocking sustainable waste heat for heating buildings.

As heat is not a regulated activity, the activities and investments by Fluvius are not part of the Investment Plan. Only where relevant for investments in gas and electricity networks do we make the link with heat networks, by deducting the potential of the need for electrification. We also outline the historical evolutions and technical preconditions for the application of heat networks. Based on the practical classification, we estimate the potential of this technology.

## Public lighting: "The right light in the right place, at the right time"

Within the activity of public lighting (OV), Fluvius is the advising and implementing partner of cities and municipalities for the preparation of an OV master plan. This master plan always focuses on the obsolescence of assets and aims at 'The right light in the right place, at the right time'. Together with cities and municipalities, performance and other requirements are set up in consultation with stakeholders. Once approved, Fluvius will put this master plan into practice and maintain the infrastructure in the best possible condition.



## Sewerage: "In line with Flemish climate policy"

Climate change is making itself felt more and more clearly in recent years. Long periods of drought alternate with unprecedented amounts of precipitation. These drastic changes force us to review our sewerage network and the way we deal with it. The vision document on sewerage defines four pillars that strategically realise the mitigation of water problems and climate adaptation through sewerage.

1. **Reducing drinking water consumption:** First of all, people need to become more aware of their water consumption. The digital water meter, installed in synergy with our energy meters, can be a useful tool for this. Next, we sensitise and motivate our customers to use more water other than drinking water wherever possible. We will do this by means of campaigns and premiums for rainwater cisterns.
2. **Circular use of water:** By connecting as many customers as possible via separate sewerage networks for waste water and rainwater, we can purify dirty water even more efficiently and create more opportunities to use rainwater as an alternative source of water or allow it to infiltrate into the soil. In addition, in the longer term we want to reuse treated waste water more often instead of just letting it flow into our watercourses.
3. **Sewerage networks future-proof:** The climate and our environment are constantly changing. Together with the managers of the public domain, we need to arm ourselves against prolonged drought, but also against more extreme precipitation. Classic solutions (increasingly large buffers and pipes) are not capable of this. Digitalisation of our network, in addition to a better understanding of how our networks work, will allow us to deploy them according to the needs of the environment and the moment. This will allow us to make smarter use of the buffers available and monitor our networks more accurately. We are therefore thinking mainly of additional data on inflow, outflow and buffering, but also of detailed weather forecasts and precipitation models.
4. **Open data:** The data we acquire by monitoring our networks more closely can also be useful to others. Therefore, we want to make all that information available to users, partners before and behind us in the chain and any third parties. That way, we can work together to contain the effects of intense precipitation or warn residents in time of a risk of flooding.

Our [Roadmap sewerage](#) explains the measures and resources being deployed for this purpose.

## Processes for network reliability

Monitoring network reliability and security of supply is one of the most important processes within Fluvius. Policies are therefore integrated into operational processes and the necessary IT systems are provided for optimal monitoring. The 'Network Management' Department makes policies and plans according to the strategy and contingencies regarding our assets and will deliver these to the 'Network Operation' Department for proper implementation, with follow-up provided.

**Asset policy** determines how assets should be managed and when which actions should be carried out on those assets. The scope of asset policy development includes issues relating to:

- **Life cycle policy:** Rules/guidelines/policies/agreements around investment, replacement, maintenance, operation, decommissioning and scrapping for all assets in the asset portfolio. Here, it is crucial to always consider the asset over its full cycle.
- **Network architecture:** Guidelines and overviews of the structure of the network. Interaction between the various components, constraints and capabilities of the grids.
- **Specifications of grid components:** Functional specifications for assets that allow the Supply Chain organisation to organise the necessary procurement activities.

Different scenarios are continuously developed in a scenario analysis and evaluated according to the asset management framework. An impact analysis is performed for the chosen scenario and implementation, follow-up and communication plans are drawn up. The asset policy proposal and associated technology sheets are then validated by the **Process and Validation Committee**.

Validated asset policies will be made available to stakeholders as a function of **knowledge sharing**. Implementation, follow-up and communication plans will also always take this element into account and may include setting up training for specific groups of employees and/or other actions for all Fluvius employees.

As part of policy **monitoring**, local network managers and policy successors monitor the application of asset policies and processes in the regional operation. They provide the necessary training to the colleagues concerned. They also monitor and/or adjust budgets.

Based on data analysis or in response to serious incidents, the necessary **feedback** is provided. Results of preventive checks are analysed and the conclusion is reported. This may initiate corrective maintenance or adjustment of the asset policy. After a serious incident, an analysis is always made of the cause, how the risk can be mitigated in the future and the necessary action plans are drawn up.

Fluvius' **energy and climate transition** and **Investment Plan** also has a major impact in terms of asset policies and processes. The necessary adjustments were made:

- Policy makes **ground rules** where we want to make which investment and when, and translates these into internal guidelines and policy documents for Fluvius' regional operations.
- **Workshops** with the regional operations provided input for this policy exercise to capture their needs and expectations as well. Via these guidelines, we are giving substance to the scenarios from the Investment Plan and the net simulations carried out.
- Limited but effective adjustments in the policy to ensure more **simplicity**.
- Planning of the **additional proactive investments** via tools.
- Providing as much **support** as possible to the regional work to make the anticipated investment wave manageable.

The above processes are common to all networks managed by Fluvius. Of course, each utility has its specific needs. In addition, operational processes are also designed as a function of network reliability.

Utility	Network development processes	Network monitoring processes	Network operation and maintenance processes
<b>Electricity and Gas</b>	A grid model of the electricity and gas networks is created in the grid calculation tools based on asset data, consumption data and measurements. Results from online or ad hoc field measurements, new or reinforcing customer requests and expected evolutions trigger grid studies that can result in grid reinforcements and grid expansions that are included in the Investment Plan.	The electricity networks (distribution high voltage) and gas networks (medium pressure) are monitored by central dispatching. Grid load is monitored and in case of problems or incidents, the necessary actions are taken, either by remote grid control or by dispatching local teams for intervention in the field. From their experience, they provide feedback to detect future problems in time.	From asset management, preventive and curative replacement and maintenance programmes are drawn up. These assets/installations are managed in databases, where both asset data and maintenance data are kept, and state-dependent maintenance is triggered. There is a standby service that is operational 24/7, intervenes online or directs people for intervention on site and records all calls and interventions.
<b>District heating</b>	The demand for heat networks usually arises from municipalities, subject to the availability of a source that has renewable waste heat available. A process has been worked out that starts with the feasibility study, and may end with realisation of expansion of a heat network.	An online remote control management system monitors and controls the managed heat networks.	The maintenance processes aim to implement preventive maintenance according to the asset policy (including periodic checks for leak detection). When drawing up the maintenance policy, a trade-off is made between investments and maintenance according to asset management principles. There is an on-call service that can be contacted 24/7 for defects.
<b>Public lighting</b>	To prioritise the LED conversion of assets, an annual schedule is drawn up that monitors a balance between a balanced conversion for all cities and towns and maximising energy savings and CO <sub>2</sub> reduction.	Defects in the grid can be detected through various channels. On assets with interactive communication modules, notifications of defects can happen automatically. In addition, Fluvius makes preventive inspection rounds to detect defects. Customers can also make reports online at <a href="http://www.straatlampen.be">www.straatlampen.be</a> or by phone via De Stroomlijn.	After reporting a defect, an initial analysis is done and then the necessary measures are taken for repair. SLAs are agreed for this purpose and an on-call service is available 24/7.
<b>Sewerage</b>	To best expand and/or strengthen sewerage networks in view of the reduction targets set and the changing climate, hydraulic models of the network are available. Decisions for guidelines are aligned with measurements, impact and failure analyses. Infiltration instead of stormwater runoff is used to restore the natural cycle to its maximum extent. Here, separation of sewerage systems is not an end in itself, but a means to achieve the reduction targets.	The pumping stations and treatment plants are operationally monitored by a permanent central dispatching that signals faults at pumping stations to the on-call service assigned to the competent contractor. In 2024, the roll-out of level sensors on the main overflows that will also be linked to the monitoring system was started.	The current condition of the sewerage networks is visualised, assessed and translated into measures according to a risk-based inspection plan. The inspection plan is driven, reported and fed back through the systems. The inspection plan has a 6-year cycle and targets about 40% of the network. The impact in case of failure is visualised per individual asset where meaningful. Supervisors monitor the correct execution of investment and maintenance works carried out by contractors.

# Network reliability measures

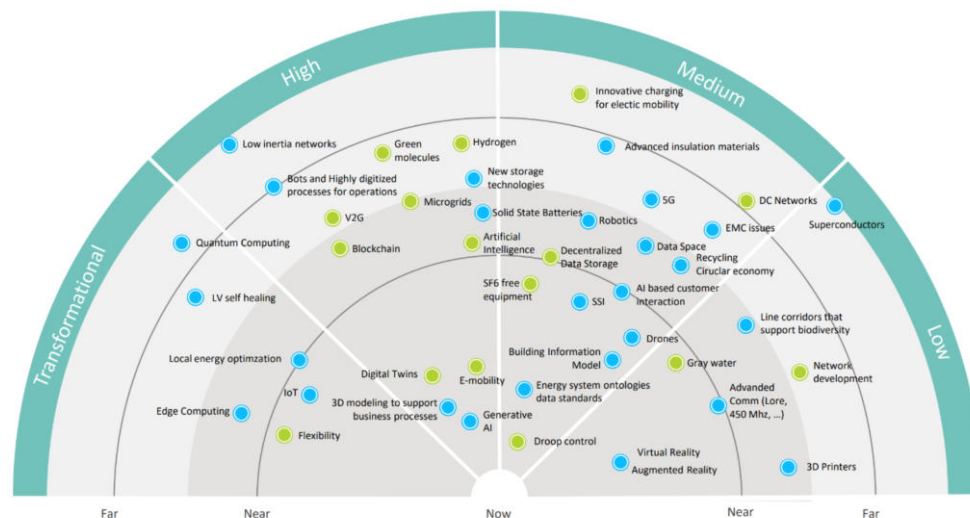
Actions to improve network reliability are determined from various sources:

- After feedback from stakeholders inside and outside the value chain
- After technological evolutions (innovation)
- After changes originating from the legislator or regulator
- After the policy development and monitoring process
- After observations in the operational processes for monitoring and maintenance
- After incidents
- After customer queries or complaints

The resulting actions can be taken ad hoc or, when impacting the asset policy, included in the overall action plan. All actions are consolidated into action lists that are transformed into a multi-year plan. Annually, the annual action plan for each utility is derived from this. The action lists and annual action plans are dynamic documents that are supplemented by ad hoc actions.

Innovation is a very important inflow of actions. Fluvius is therefore committed to both internal and external research and innovation initiatives as well as knowledge sharing among colleagues. In these initiatives, we cooperate with other parties (companies, governments, start-ups, academics) that are committed to innovative solutions. Our role is on the one hand to identify opportunities and bring parties around the table where necessary and on the other hand, within the scope of our core tasks, to put our weight behind these initiatives by providing knowledge, expertise, data and removing possible obstacles.

Fluvius uses an Innovation Radar to consolidate all initiatives, both ongoing actions and evolutions. We classify initiatives according to impact (transformational, high, medium, low) and time horizon (far, near, now).



## Electricity

Besides the 'no regret' investments, the following measures also have a positive impact on the grid reliability of our electricity distribution networks:

- Digital toolbox: connectivity, grid studies, data disclosure digital meter, development of simulation tools, voltage management
- Digitisation of electricity grid: making assets visible and operable remotely
- Implementing flexibility: technical and market flexibility
- Actions in the framework of the Flemish Energy and Climate Plan and electrification linked to different types of assets: cabins, transformers, medium- and low-voltage networks, connections and decentralised production

## Gas

Our 'keep it running' strategy for the gas distribution networks was fleshed out with the following measures:

- Investigate possible phase-out strategies for natural gas
- Implementation of new methane emissions legislation
- Evaluate opportunities for biomethane injection on the natural gas distribution network

## Heat

The activity of heat networks is developing rapidly. By 2024, the following measures were taken:

- Maintenance strategies for the assets of heat networks
- Develop policies for leak detection in heat networks
- Develop policies for water quality control

## Public lighting

In addition to the roll-out of the LED conversion, master plans and metering of public lighting networks, the following measures have also been taken:

- Implementation of a Central Lighting Management System
- Preparation for the replacement of the current network control system
- Refactoring of the asset register
- Improving the sense of safety: with a focus on traffic safety, the necessary measures are being taken on the basis of the standards to maximise the sense of safety
- Biodiversity: as the current standards only provide limited guidelines in this area, they are currently being revised so that measures can be integrated into the master plans of cities and municipalities. Fluvius has pilot projects underway in function of biodiversity in public lighting and an active collaboration with the Agency for Nature & Forest
- Building and analysing operational data of the past infrastructure to further develop maintenance guidelines.

## Sewerage

In our Investment Plan, we specifically connect as much waste load as possible additionally to the treatment plant. This way, we clean up the watercourses and make wastewater reuse more interesting. Simultaneously, we give rainwater the chance to soak into the soil or offer it as an alternative water source.

- We studied the impact of climate change and the Flemish source measures policy on both water management and our networks and communicate this to Flemish households and authorities.
- In cooperation with the various actors, rainwater plans were developed for the catchment area, containing measures for the main bottlenecks in water management including priority and responsible actors.
- We digitalise sewerage networks: we maintain the digital twin of our network, further roll out the monitoring of the most important hydraulic constructions and, where useful, we automate them or make them teleoperable.
- We inspect our networks for structural defects and translate the inspection results into an appropriate programme of measures that are planned according to the applicable asset management principles.

# Targets and metrics

**Ensuring the reliability of our networks is an overall objective of Fluvius. Our investments and measures contribute to this. Each utility has its own strategic and operational objectives and benchmarks. Metrics are also used within the AM touchstones that quantify the impact of policy choices.**

## Electricity

The [Energy Transition Investment Plan](#) puts forward an **investment rhythm** whereby, with available resources, the electricity grid is upgraded as much as possible where we deem it necessary first. Through efficient asset planning, priority grid sections are systematically addressed. In 2024, in line with the EU Taxonomy, € 995,640,421.64 was invested in electricity grids.

Our Investment Plan aims to prevent the grid from reaching a state of overload, but to invest in the reinforcement of the grids in a timely manner. Thus, the proportion of the grids that are overloaded should not increase. Overloading can be measured by the **Voltage Load Indicator**. This metric gives an indication of the load and the voltage drop occurring on the grid. As of 31 December 2024, the Voltage Load Indicator was 86.30%.

Overloaded grids can cause **voltage complaints** and negatively impact grid reliability. Excessive grid voltage causes failures to occur on the grid, but can also, for example, cause inverters of PV installations to switch off in private homes and/or businesses. To monitor the issue of voltage complaints with metrics, a dashboard has been created. Via 'My Fluvius', customers can consult the 'Network Checker' and see where current problems are located and report new complaints. Based on this data, Fluvius can monitor complaints and determine where priority action needs to be taken. In 2024, Fluvius received 2,220 voltage complaints whose cause was the Fluvius network.

As a distribution system operator, Fluvius has a large number of assets in its portfolio. Digitising the assets so that they are visible and operable from a distance is one of the objectives. Now, 100% of our transformer substations and switching stations are already digital. So these objectives have

already been achieved. Next in line are distribution cabinets. We aim to digitise 12.5% of distribution cabinets by 2030. As of 31 December 2024, 6.3% of distribution cabinets had been digitised.

We also continuously capture customer requests for new decentralised production connections and connection reinforcements. We aim to facilitate these to the maximum extent possible and keep **lead times** for these to a minimum.

The security of electricity supply to customers is expressed in the number of **Customer Minutes Lost (CML)**. This is the number of minutes a customer is without electricity on average per year. In 2024, the CML was 25 min 5 sec (low and medium voltage).

## Gas

Due to the inertia of the meshed gas network, the number of **unplanned outages** is very limited. For each gas leak, failure modes and data on the asset and location of the leak are tracked for analysis and reporting. For each gas leak report, the objective is to carry out an intervention within two hours, including preliminary or, if possible, final leak repair.

Mainly in the case of works on connections, customers will experience **planned interruptions** of limited duration.

Every gas leak involves **methane emissions**. The largest methane emissions are caused by external damage to our gas networks. The amount of methane released during a gas leak is very difficult to measure. Fluvius has voluntarily joined OGMP (Oil & Gas Methane Protocol), a partnership that works to reduce methane emissions and expects a comprehensive annual reporting and action plan according to an adequate measurement methodology. In 2023, the volume of methane emissions was 2,640 tonnes of CH<sub>4</sub>. At the time of publication of this report, a figure for the 2024 financial year is not yet known.



## Heat

Due to the (deeper) location of the heat networks, the insulation around the pipes and the redundancy in the heat transfer stations, **unplanned interruptions** in heat supplies are rather limited. For every notification of inadequate heat supply, the objective is to carry out an intervention within four hours. This intervention aims to restore the heat supply as soon as possible. With each intervention to an asset, the failure modes and data of the asset and its location are tracked for analysis and reporting.

## Public lighting

The ambitions for the **LED conversion rate** are to convert all public lighting assets by 2028. As of 31 December 2024, the degree of conversion was already 60.87%. By the end of 2028, all public lighting networks should also be **metered**. We are also committed to **protecting against indirect touching** of the public lighting networks and aim to minimise incidents.

Operationally, SLAs have been agreed to **repair defects**. For example, defects with road safety impact must be fixed within 48h.

## Sewerage

Europe has required member states to have clean watercourses/bodies by 2027 and articulates this through the [Water Framework Directive](#). In Flanders, the European framework directive was translated into the [Integrated Water Policy Decree](#). VMM worked out a proposal per party, per municipality and per water body to achieve the water quality objectives described in concrete terms. Within Fluvius, these European targets are known as **'reduction targets'**. They determine the level of sewerage we have to meet within the predetermined timing.

Compared to the situation in 2017, we need to reduce the pollutant load discharging to the watercourse by a set number of (existing) residents. These targets assume that any additional construction will not increase the pollutant load. In addition, the treatment rate for each municipality must be at least 50% by 2027. Today, this is not yet the case for all municipalities that have entrusted their sewerage management to Fluvius. In 2024, in line with the EU Taxonomy, € 150,185,080.53 was invested in the sewerage networks.

In order to monitor these reduction targets, a system was set up in 2024 to enable us to better map the effectiveness of actions and the impact.

Targets have also been set for **inspection plans** on the assets. A commitment has been set which Fluvius tries to meet. This distinguishes between critical assets and less critical assets. For the critical assets, we achieve similar results to our peers. The condition of the assets after inspection can be consulted in the 'Status tool' of Aquafin.

## Monitoring the effectiveness of measures

The policy monitoring process is responsible for evaluating the effectiveness of the asset policy. This is already considered in the policy development process, which indicates how the policy can be optimally monitored.

The effectiveness is reported to relevant stakeholders such as:

- The internal governance structures
- The 'Grid Management' directorate
- The 'Grid Operation' directorate, including the regional operation
- The regulator and authorities
- The stakeholders involved

In addition, metrics are periodically monitored in systems and where possible in dashboards. Where necessary, new actions are defined.



# Smart data and infrastructure [ES2]

Fluvius is data manager of the Flemish energy market. Material positive impacts and risks are linked to the investments and services related to the digitisation of energy networks and cyber security and protection of the [personal] data generated.

IRO description	IRO type
Flexibility solutions: 'We help customers take maximum control of their energy costs'	Impact positive
We enable interconnection between energy markets (the 'traditional' supplier market, energy communities, the flex market, etc.)	Impact positive
We unlock data in a customer-friendly, future-oriented way	Impact positive
We support the Flemish Government's data ambitions	Impact positive
We go for in-depth digitisation and automation	Impact positive
We inform more and communicate more proactively about the state of the electricity grid	Impact positive
Risks related to cybersecurity and personal data leakage	Risk

**2,457,097**  
Number of digital meters for electricity

**1,690,652**  
Number of digital meters for gas

## Vision for smart infrastructure and data

Fluvius has written down its data ambitions in its 'Vision data 2025'. Energy data have an increasing importance and Fluvius will take an important role in this. In addition, a 'Digitalisation' roadmap was developed in 2024 to give further shape to this.

The regulator is monitoring the progress of the development of a smart Flemish energy network<sup>1</sup> and the role of Fluvius as a data manager<sup>2</sup>. VREG assesses Fluvius on the following two aspects: the presence of grid components that can provide remote monitoring and control and the way in which the actual grid management is carried out.

Fluvius supports the energy transition with its multi-utility networks. High-quality and sufficiently fine-grained energy data are necessary for the realisation of the energy transition, which will also bring about major changes, both for the customer, the grid management and the entire energy market:

- We are rapidly evolving from fossil to maximally renewable energy sources.
- We are moving from centralised to decentralised energy production and from purely physically driven energy networks to digitally controlled networks.
- We are moving from a landscape in which supply could always follow demand, to one in which the available supply of renewable energy will be decisive and waste of energy should be avoided as much as possible.
- We are moving towards a landscape in which there will always be more different technologies and market players.

Expectations are changing and data sharing will increase. Energy data offer citizens, companies and public authorities the right opportunities to keep their bills under control, and not lose comfort.

To ensure that we as grid operators continue to make smart and tailored investments in the grids, synergy will be needed in the use of the available data. On the one hand, this will enable us to make the necessary investments in time, while on the other hand it will also encourage customers (financially) to take the state of the grid into account in their consumption behaviour. Thus, not only will the individual end customer save money by playing a more active role, but the total investments in the grids will also be kept under control, meaning that the total social cost of

enabling the energy transition will also be lower. So smart grid management, based on the right energy data, will soon also help keep energy bills under control.

In 2025, Fluvius will publish a data management investment plan.

As part of the paper 'Vision 2050 - the grid management of the future', we and Fluvius formulated five societal criteria in 2020 that we believe are important to make the right decisions on initiatives and actions at any point in the energy transition to achieve that process in an efficient way. Those same criteria for the future of energy grid management are also applicable to actions and solutions on the role of data in the wider energy transition. All data solutions must therefore be both:

- **Safeguarding comfort for grid users:** Energy data must be able to at least preserve, and where possible further enhance, consumers' current comfort in tomorrow's more complex energy landscape.
- **Socially responsible:** Data must be available, affordable and easily accessible to all customer groups. They must be able to prove their added value for every customer group.
- **Ecologically responsible:** Data should help achieve climate goals. They are crucial to properly integrate and use renewable energy in the energy landscape.
- **Be financially realistic:** The development of data systems should follow the needs of citizens and the market, rather than costing a lot of money but proving necessary only for the 'happy few'. The costs of building tomorrow's energy market must remain manageable.
- **Be technically feasible:** Data systems must be integrated into the energy market in a technically-correct, feasible way, in coherence with the physical reality of electricity grids, so that grid stability is always guaranteed. In the interest of a well-functioning energy market that takes into account all types of customers and players.

<sup>1</sup> A report by VREG on the development of smart electricity grids in Flanders can be consulted at <https://www.vreg.be/sites/default/files/document/rapp-2024-01.pdf>

<sup>2</sup> A report by VREG on Fluvius' activities as a data manager can be consulted at <https://www.vreg.be/sites/default/files/document/rapp-2023-20.pdf>

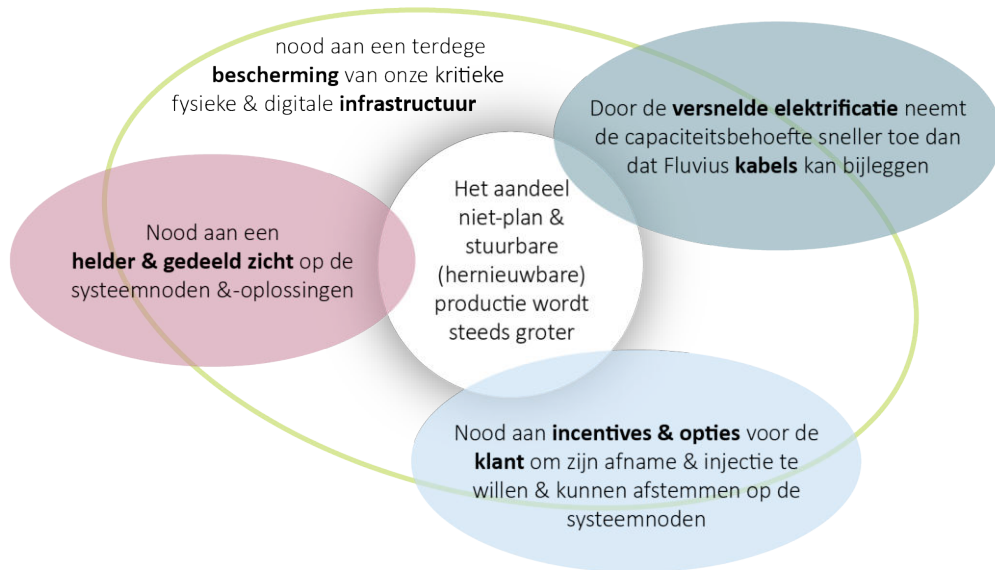
In addition to these five generic criteria on energy transition, we have defined three additional criteria specifically for the collection, management and dissemination of energy data that clarify how we intend to take up our role as data manager with Fluvius, and that should guarantee the proper functioning of the market also in the future:

- **We monitor and respect applicable privacy rules:** energy data are sensitive data. We guarantee confidentiality, security and compliance with European, Belgian and Flemish GDPR legislation.
- **We act as a neutral, facilitating party:** Many parties are active in the energy landscape. We let that market play to the full. We act as the neutral, facilitating party that can act as a reliable hub. As a neutral player, we make validated data available to each mandated party in the system according to the right granularity, form and speed.
- **We are customer-oriented:** we ensure that the right data are delivered to the right party at the right time, constantly keeping an eye on the expectations and needs of the customer (consumer, market player, government). As a result, we support the development of new products and services by other parties, products and services that benefit all customers and society.

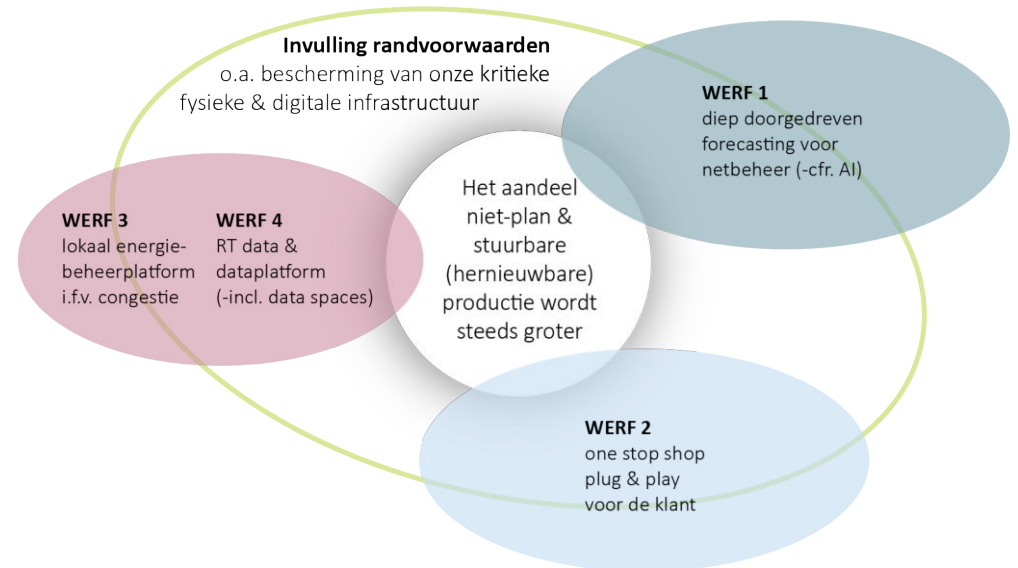
# Digital long term plan

Digitalisation is not an activity that can be realised all at once in isolation, but is an element to be filled in across Fluvius' core tasks with a long-term plan as a foundation for future visions and strategies. Strategic engagements, through which Fluvius continuously improves its strategy, are also undergoing a digital transition. The necessary roadmaps are drawn up to realise the digital strategy.

To shape the digital long-term plan, the biggest challenges of the electricity ecosystem are identified.



To respond to these challenges, Fluvius has defined four digital yards. For each digital yard, targets have been developed with 2035 as the time horizon. These long-term objectives are broken down into three phases, each with a specific time horizon and intermediate goal.



- **Phase 1 [2027]: From data quality to digital foundations**
  - We ensure guaranteed data quality.
  - We build a solid digital foundation of future-proof data foundations and digital infrastructures for the years to come.
  - We increase adoption rates for advanced technologies and lay the foundations for collaboration in the energy ecosystem.
- **Phase 2 [2031]: From collaboration to integrated platforms**
  - We realise part of our goals through targeted collaborations.
  - We (co-)develop advanced platforms and interfaces to enable cooperation and interoperability within the energy ecosystem.
  - We implement standardised data exchange and lay the foundations for agile response to market changes and customer needs.
- **Phase 3 [2035]: From an agreed role in platforms to an adaptive role as an integrator within the system**
  - We take agreed roles in platforms.
  - We continue to build on our role as an adaptive [platform] company in the energy ecosystem and are able to respond quickly and appropriately to changes in the market and customer needs.
  - We make agile use of advanced algorithms and fully automated real-time processes

It also identifies the preconditions that need to be fulfilled to realise the digital transition. These roadmaps enable Fluvius to let digitalisation contribute to smart data and infrastructure, a catalyst for the energy transition. The energy transition can only succeed if there is collaboration. Fluvius will not only monitor evolutions, but where we can we will enthuse and support customers and market players to make this all-important energy transition a reality. Always with the right data for the right party at the right time.

## Secure data and infrastructure – cybersecurity

Digital grid components create more and more data that must be secured, as part of the entire digital environment. As a utility company, Fluvius is a potential target for cyber-attacks and so Fluvius must adopt appropriate security standards.

The Flemish Energy Decree requires all data to be secured with appropriate technical and organisational measures to ensure information security in relation to the databases and processing systems and services, and to restore availability and access to the databases in the event of a physical or technical incident.

- Personal data is pseudonymised and encrypted
- The measures taken must all be documented centrally
- The Energy Decree imposes that tests, assessments and evaluations of the effectiveness and appropriateness of the technical and organisational measures must also be carried out (at least) 2x per year. Based on the assessments and evaluations, existing IT infrastructure and organisational policies for processing activities must be adapted.

In order to structurally meet these obligations, Fluvius has started the process of adapting the existing processes and structures and grouping them into the Information Security Management System (ISMS) for the energy and data management activities.

Under the influence of the NIS 2 directive (Network & Information Systems, European legislation linked to cybersecurity), the scope of electricity and data management has been extended to the full scope of Fluvius' activities. Consequently, the existing ISMS is extended to cover all activities and domains within Fluvius. The NIS2 legislation provides for 83 management measures to be implemented by Fluvius in various processes. A roadmap was drawn up for this purpose, which is being followed up by the ISMS forum.

Management measures are divided into four categories:

- Organisational measures
- Human-focused measures
- Physical security measures
- Technical measures

Fluvius aims to achieve external certification for ISO27001, the international standard for information security, by 2026. Currently, Fluvius already complies with all legal obligations (including notification of major incidents) regarding registration with the CCB (Belgian Centre for Cybersecurity).

Specifically for the protection of personal data, Fluvius applies the GDPR legislation that applies to all person-related data. Fluvius has appointed a Data Protection Officer (DPO) within the Information Security Department. This DPO functions independently to carry out his supervisory and advisory tasks and his role as point of contact.

Besides setting up GDPR-compliant processes, Fluvius also offers various training courses for employees who actively work with person-related data.



# Targets and metrics

**The detected material IROs are strongly linked to the objectives as described in the ‘Vision Paper Data 2025’ and ‘Vision Networks 2050’. These are described in both vision notes through objectives and actions. The following specifically explains the actions that contribute to a positive material impact.**

## We go for in-depth digitisation and automation

All utility networks contribute to the energy and climate transition for Flanders. To support this transition via the multi-utility networks, a thorough digitisation and automation of the various networks is necessary.

For the electricity network, there is a greater need for data and digitisation to obtain a more accurate picture of the load on the electricity networks. We are doing this through the accelerated rollout of the digital meter. Together with sensors in distribution cubicles and switching stations, the new meters enable a fully digital version of the electricity grid. This allows us to measure the grid load permanently and finely, perform simulations on the digital grid, and automate management actions. This digital version of the electricity grid has been prepared to integrate external data to provide even more accurate simulations in the future.

Alongside the digital model of the power grid, there is the automation of power grids. Automation allows us to meet new needs in terms of energy supply faster and more efficiently in a changing energy landscape. Consumption is growing, including through electric cars and heat pumps. Moreover, there is plenty of decentralised injection, through solar panels, for instance. We will therefore have to manage the grids more dynamically, resulting in more operations. Automation is then necessary to keep the grid working properly for all Flemings and to keep the number of power cuts among the lowest in Europe.

In the activity of public lighting, the LED conversion is the basis for digitalisation and automation. Along with the conversion of luminaires, separate controls are also built into control cabinets. This control system enables remote control of public lighting and thus smarter deployment of public lighting.

Construction of sewerage networks is expensive, time-consuming and causes a lot of inconvenience. Therefore, it is important to make optimal use of the existing capacity of the networks. This requires smart control. The sewerage network offers the potential to both drain water, but also to temporarily buffer it in the context of infiltration and reuse. Smart steering is essential for this, because the buffers must be empty to prevent flooding and, on the other hand, full so that the buffered water can serve as a resource.

This means that we will monitor the sewerage network (inflow, outflow, levels of buffers and storage), but will also use the other input of data (weather forecasts, local precipitation models, etc.) to determine investments and steer buffers. Accurate, real-time data, combined with the necessary models are necessary to automatically control sewerage networks.

## We support the Flemish Government's data ambitions

As part of the further digitalisation of Flanders, the Flemish Government has set up a new Flemish Data Utility, Athumi, in which different ‘data islands’ will be connected, so that the collective data flows can create new added value for society and the economy. Fluvius, by supplying Flemish energy data, actively supports this expansion. Based on its mission, Athumi is convinced that new prosperity will be tapped into when consumers and companies retain control over their data. This conviction is reflected in their mission to stimulate and facilitate data exchange. Central to this is the activation of innovative data solutions among companies and control over data.

In addition, Fluvius itself makes Open Data available via the Fluvius Open Data Platform. Data are publicly available to parties in the energy landscape such as companies, consumers, research and educational institutions, ... These datasets are continuously expanded and refined. In this way, Fluvius is building an open, active and reliable relationship with all our clients, local governments and authorities as an energy knowledge centre. Fluvius respects the personal sensitivity of all data on this platform and complies with privacy legislation. All data made available are anonymised and aggregated so that no individual data can be derived.

The data made available are those collected by Fluvius as part of its statutory duties. They comply with open standards, are shared digitally for everyone and can be used, reused and disseminated

free of charge. Use of the data implies agreement to the user licence that describes all conditions and rights of use.

## We help customers take maximum control of their energy costs

In a landscape full of renewable energy, not only energy efficiency is important. It is also necessary to consume mainly at those times when renewable energy is readily and sufficiently available. Those who produce their own energy - e.g. via solar panels - should try to maximise their self-consumption. So a 'consumption shift' is needed. Digital meter technology and data are crucial even then: they give consumers the knowledge and ability to cope with this new reality without loss of comfort, to take maximum control of their consumption and thus keep their energy bills under control. And they help governments and companies develop new policies and services that enable this consumption shift. From Fluvius, with the right data flows, we will focus on these three actions in the coming years:

- We support dynamic tariffs
- We make shifting consumption financially attractive
- We give customers access to the flex market

## We enable interconnection between energy markets

In practice, because the energy market in the future will consist of different 'markets' (the 'traditional' supplier market and, among others, the aforementioned energy communities and the flex market), data will have to act as a common thread, a glue, to achieve the integration of the different energy markets and make the system work well together. If a customer moves, the energy supplier concerned will notify us. At that point, it should be considered whether contracts of that customer in other 'markets' (an energy community, a contract in the flex market) should not also be terminated. In tomorrow's world, the relocation of a customer who is part of an energy community and has a separate contract for his PV production should also be able to proceed smoothly.

We want to act, both today and tomorrow, as a market facilitator for all types of energy markets. Customer data must always be kept up to date and synchronised, invoices must be processed correctly and contracts that are no longer applicable must be closed.

## We unlock data in a customer-friendly, future-oriented way

We ensure that energy data can be accessed in a customer-friendly, future-proof and fast way to all market players who have the right access rights for this purpose. This is crucial to enable modern management of the energy system. For grid operators, a good data exchange is important for efficient technical grid management, smooth and fast capture of meter readings and full remote implementation of tariff changes, among other things. For energy suppliers, a smooth and modern opening-up of energy data is in turn important for a better and more accurate prediction of consumption within each supplier's own customer portfolio, but also, for instance, for a better estimation of the effect of dynamic tariffs on the market. Both principles can lead to lower costs, and a lower energy tariff for the customer.

In addition to making energy data available to energy suppliers and other commercial market players such as energy service providers, we also make them available to the regulator VREG and the Flemish Government to enrich, for example, the V-test and the Woningpas.

For a smooth data exchange between all parties, we define one technical standard language for data exchange between all parties via Application Programming Interfaces (API). This should support good and fast cooperation between multiple applications. Data should thus always be user-friendly, secure and correctly available between all market players in the future.

## We inform more and communicate more proactively about the state of the electricity grid

With a higher and more variable load on electricity grids, there is a growing need for better communication on the state of the grids to facilitate and better direct grid use. The aim is to take into account the physical limits of the distribution grids at all times while making available grid capacity maximally available to interested grid users.

Communication about the state of the electricity grid can range from purely informing the energy market about grid use and available capacity for that day and the coming period, to making extra grid capacity available locally at specific times, to deploying mechanisms when grid stability would exceptionally be threatened.

Fluvius will inform market players more clearly about grid load. If free capacity can be used when implanting new infrastructure (electric vehicle charging stations, PV installations, wind turbines, etc.), we save social costs and customer connection is usually faster and cheaper. Fluvius launched an online 'capacity guide' in early 2024 which shows under what conditions

off-take or injection is possible for companies on the medium-voltage electric grid throughout Flanders. This capacity guide helps companies that need a heavier grid connection or are looking for suitable locations for charging station parks or wind and solar farms. This application is offered as open data, and is available via the Fluvius website. The tool aims to improve planning and smooth the connection process for companies. Fluvius' capacity guide offers an indicative picture of the current state of the medium-voltage grid, not on the future state. To build the new capacity indicator, Fluvius enlisted the help of several company customers. They were surveyed in advance and gave their input on the features. Their feedback especially helped to make the application as accessible and user-friendly as possible. Depending on new investments, the application is systematically updated. Once corporate customers have a vision and point of view on energy volumes they will need in the future, they can turn to Fluvius for more concrete details or a more in-depth study that examines connection options.

Sufficient capacity is always provided for low-voltage customers, such as households and companies with smaller connections. The information derived from the mandatory notifications for installing solar panels, a charging station and private home batteries is included in the periodic grid simulation that forms the basis of the investment plans.

Shortages of grid capacity at peak times can give rise to the local phenomenon of solar panel inverters failing. Therefore, Fluvius has rolled out and further refined an action plan. One of the actions, is a Network Checker at [mijn.fluvius.be](https://mijn.fluvius.be). With the Network Checker, every customer can immediately see if there are any outstanding complaints in his neighbourhood. More information on failing inverters can be consulted on our [website](#).

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<sup>1</sup> *The capacity guide can be consulted via [https://opendata.fluvius.be/pages/map\\_perceel/](https://opendata.fluvius.be/pages/map_perceel/)*

# Governance information [G]

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# Business conduct [G1]

At Fluvius, we attach great importance to ethical and responsible business behaviour and good governance, endorsed by our Code of Conduct and Ethical Charter. We not only comply with legal requirements, but also proactively pursue anti-corruption and bribery, dialogue with policymakers and fair relationships with suppliers.

IRO description	IRO type
Implement a fair framework for utility business practices (anti-corruption; anti-bribery; corporate governance)	Impact positive
Intensive cooperation and coordination with local governments close to citizens and with sector and stakeholder organisations	Impact positive
Strong control by regulator	Impact positive
Introducing sustainability criteria in procurement procedures	Impact positive
Complexity of utility organisational structure	Impact negative
Responsible lobbying to influence regulatory framework favourably	Opportunity
Challenges in raising additional equity	Risk
Possible unwillingness to approve investment plans and implement new tariff structures and lack of political support	Risk
Fraud	Risk

## The role of the governing, management and supervisory bodies [G1.GOV-1]

The [Decree on Local Government of 22 December 2017](#) stipulates in the article 434 paragraph 5 that the General Assembly of a commissioning association must adopt a Code of Conduct applicable to the members of the Board of Directors. This Code reflects the participants' expectations and requirements for the directors of the commissioning association, establishes clear agreements and explains the duties and responsibilities of Board members. The Code of Conduct was approved at all applicable General Meetings.

The Code of Conduct stipulates the following:

1. A director considers himself or herself sufficiently qualified to participate in the management of the association and, in addition, has specific competencies to contribute to its functioning.
2. A director takes to heart the tasks he or she must perform in his or her capacity as director and those to be performed by the Board of Directors.
3. A director informs himself or herself thoroughly when he or she wishes to take up a mandate and ensures that he or she acquires knowledge about the association, its mission and values, activities, articles of association and business plan, shareholders and all other important stakeholders. He ensures that his knowledge and competences relating to these elements remain up-to-date.
4. The director is willing to spend sufficient time preparing for meetings. He studies the agenda and the documents made available before, during and after the Board meeting. He provides timely comments to the chairman on the draft minutes he has received or on any other document.
5. The director ensures sufficient availability and attendance at meetings.
6. The director actively and positively participates in the functioning of the Board of Directors, giving high priority to collegiality and dialogue. He or she contributes to the development and improvement of the dynamics of the Board of Directors.
7. The director behaves ethically and with integrity in accordance with the general governance codes and practices/usages of the association and with the approved mission and vision.
8. The director promotes the interests of the association, taking a long-term view and ensuring continuity. He exercises his mandate in the interest of the association and pays particular attention to promoting the development and reputation of the association.
9. A director takes an interest in the main details of a file or a situation that is decisive for the association with a desire to contribute to its performance and to the continuous and balanced development of the association.
10. A director strives for equal treatment of all shareholders without distinction and ensures that the legitimate interests of other stakeholders are respected.
11. A director is aware of the social importance and the public character of the association that holds the mandate.
12. A director acts honestly and in good faith in the interest of the association and does not allow personal motives, prejudices or conflicts of interest to play a role in the decision-making process and does not allow interests to prevail that apply only to the participant he or she represents. He or she always strives to adopt an independent position in relation to all stakeholders.
13. The director handles the information he or she obtains from his or her mandate with discretion and confidentiality in all circumstances. This applies during and after the end of the mandate.
14. The director respects the legal provisions applicable to the association and to his or her mandate as a director, as well as the agreements laid down in the Board of Directors or General Assembly. The director is aware of the possible risks of the association and is familiar with the aspect of directors' liability.
15. The director is familiar with the regulations on publicity of governance, the regulations on privacy and the association's privacy policy. Taking the aforementioned regulations into account, he or she guarantees full transparency vis-à-vis all stakeholders involved in terms of information provision, implementation and compliance with agreements.
16. The director monitors the quality of the functioning of the Board of Directors and accepts that its functioning and his or her own contribution can be evaluated.
17. The director provides feedback to the participant he or she represents.

Given the complexity of Fluvius and the sector in which we operate, a training course is provided for each new member of the Board of Directors at each renewal of the Board in order to increase expertise. During this training, all new directors receive explanations on the following topics:

- General presentation of Fluvius: activities, structure, organisation, staff composition
- Strategy, mission and vision: pillars, objectives, values
- Legal framework: legal framework, regulations at different levels, regulators,
- Programmes and current evolutions: current programmes and preview of the development of activities
- Finance: basic concepts, financial strengths, flows, financing, tariffs
- Offering: presentation of activities and development of customer service
- Explanation Guberna (Institute for Directors): The 10 commandments for a professional director in the public sector (see also Code of Good Governance)

Fluvius' [Corporate Governance Charter](#) explains the roles and responsibilities of the governing, managerial and supervisory bodies regarding business conduct.

As a supervisory body, the Audit Committee is competent to advise the Board of Directors regarding the control of financial information prepared by Fluvius System Operator cv, the internal control systems set up by the Board of Directors and management and the correct application of the rules on sound financial management within the limits of applicable company law.

With regard to business conduct, the Audit Committee oversees:

- the integrity of the financial information assessing the accurate, complete and consistent nature of the information;
- the consistent application of accounting standards;
- the internal control and risk management systems set up by the Management Committee (at least once a year);
- the reporting of the Internal Audit Department, including audit recommendations and actions formulated by management in response to them;
- specific arrangements under which staff members can raise concerns in confidence about possible irregularities in financial reporting or other matters.

The Management Committee is responsible for the day-to-day management and operational direction of the company. They carry out the mission, vision and values of Fluvius. In addition, they are responsible for the timely preparation of accurate and reliable financial data and reporting in accordance with applicable accounting principles and policies and explaining them to the Board of Directors in a balanced and clear manner, the conduct of the operational risk policy and the implementation of internal controls especially systems for identifying, evaluating, managing and monitoring financial and other risks.

## Description of the processes to identify and assess material impacts, risks and opportunities [G1.IRO-1]

The process to identify material impacts, risks and opportunities aligns with the double materiality analysis process. No separate screening took place for the IROs regarding business conduct. Only stakeholder consultations as part of the double materiality analysis have taken place.

The process for identifying material impacts, risks and opportunities took into account relevant criteria such as the context of the sector, the interactions that take place, the nature of the activities, ...



## Corporate culture and business conduct policies [G1-1]

### Ethical charter, anti-corruption and anti-bribery

Fluvius has an integrity policy, described in the [Ethical Charter](#). This document describes the concept of ethical conduct within the professional context of the company and its shareholders and stakeholders. We play a unique role in society by carrying out an important social mission on behalf of cities and municipalities for all inhabitants of Flanders. Acting with integrity or ethics in the performance of the tasks is then a matter of course. A sincere attitude and conduct are essential in order not to damage our credibility and reliability.

Given the regulated context in which Fluvius and its shareholders operate, European and federal regulations naturally also apply. Not a complete overview, but a number of specific issues are explained below:

- The Energy Decree imposes, among other things, a decree non-discrimination obligation, a confidentiality obligation and professional secrecy on the staff and board members of the Economic Group Fluvius. There is also a regulation on incompatibilities for the directors of the operating company Fluvius System Operator and the annual remuneration of the managing director, the CEO and the members of the Management Committee are capped.
- The various commissioning associations (OV) that are shareholders of Fluvius must comply with the Decree on Local Governance. This also includes regulations on incompatibilities for the directors.
- In our dealings with contractors and suppliers, public procurement legislation almost always applies. This legislation provides specific rules to prevent and punish conflicts of interest and corruption.
- In application of the EU Directive on protection for whistleblowers [EU/2019/1937] of 23 October 2019 or the Whistleblower Directive, whistleblowers will be protected against dismissal, demotion, harassment, withholding of promotion, disadvantage, coercion, etc. Persons who help whistleblowers, such as colleagues and relatives, will also be protected. It also lists any support measures introduced for whistleblowers, such as the provision of information and advice on remedies that protect against reprisals as well as access to legal aid.
- The Fluvius Business Conduct Policy is also consistent with the UN Convention against Corruption.

The legal obligations are naturally translated into Fluvius' processes and working instructions, but we also go beyond what is legally required. In the statutes of the commissioning associations, an extension to the legal incompatibility regulation has been inscribed, among other things.

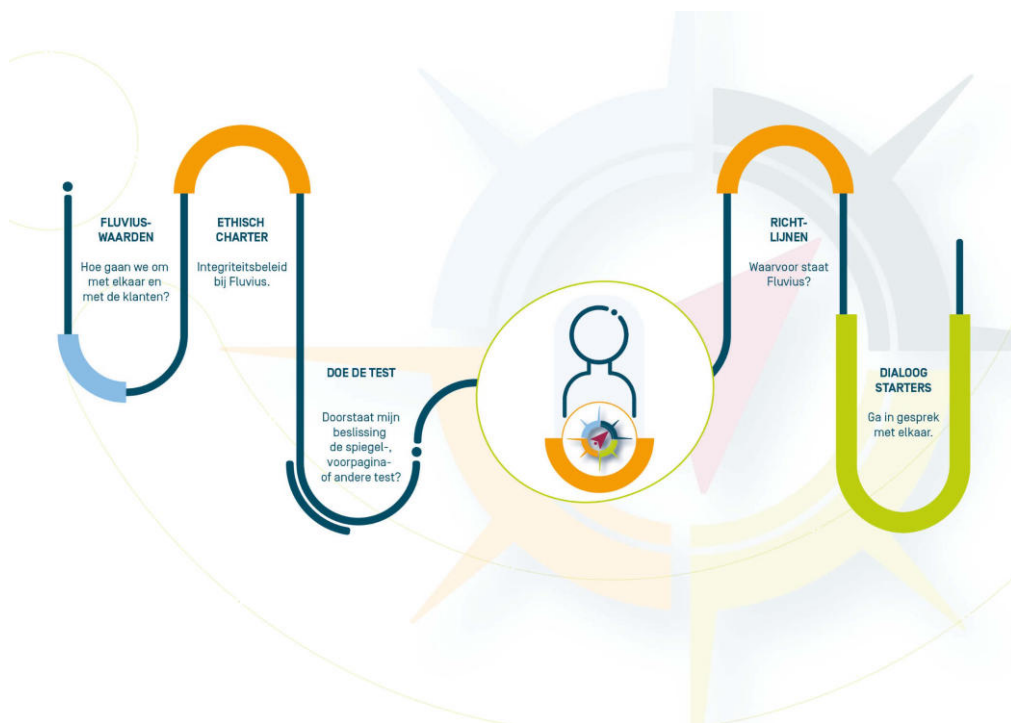
The application of our values, the roll-out of the culture trajectory and the policy principle of Corporate Social Responsibility (CSR) also show how we define the integrity policy for our employees. Also at play are the corporate governance provisions, for which Fluvius has drawn up a [Corporate Governance Charter](#). Fluvius is thus not limited to merely complying with its legal obligations.

From a working group of senior managers, legal and HR experts, various insights from practice were established in dialogue with Fluvius employees with diverse functions. This identified concrete situations in which ethical guidelines and boundaries would be welcome. Further dialogue, including with the Management Committee, produced the integrity guidelines. The management has also explicitly committed to these.

The integrity guidelines frame within the following themes:

- Dealing with each other at Fluvius
  - Respect for each other as colleagues
  - Trust and shared responsibility, openness to feedback
  - Participation in events and training
  - Non-discrimination in word and deed
- Be an ambassador for Fluvius
  - Dealing with clients
  - Dealing with social media and with people outside Fluvius
- Corruption and conflicts of interest
  - Gifts: rules of thumb
  - Events and invitations: rules of thumb
  - Secondary activities: rules of thumb

Managers act as the first point of contact for our employees, including in this matter. Fluvius also encourages open dialogue among colleagues. We consider it important to ask for concerns and objections within the entire team, including on decisions related to acting with integrity. Through support materials, which are used in periodic, thematic discussions at the meetings of all teams in the company, all employees are helped to have such a conversation and take decisions in day-to-day reality. In this way, we also put preventive efforts into ethics (see also [Prevention and detection of corruption and bribery \[G1-3\]](#)).



## Whistleblowing channels

Fluvius implements an independent and easily accessible procedure for the reporting, investigation, handling and possible punishment of irregularities and breaches of ethical principles through the whistleblowing channels. The integrity of those who report such breaches is thereby guaranteed at all times and everywhere. De Stroomlijn has also set up the necessary whistleblower channels in accordance with the regulations.

Any employee confronted, directly or indirectly, with unethical behaviour can report it to his or her supervisor. The general communication channels of Fluvius and De Stroomlijn can be used to report violations. In addition, Fluvius provides several ways for both interns and externals to make a report in a confidential manner:

- Via a dedicated mailbox [Fluvius-DeontologischeCel@fluvius.be](mailto:Fluvius-DeontologischeCel@fluvius.be)
- Via the [online form](#) created for this purpose

The integrity of those who report such breaches is always and everywhere guaranteed. These reports are all handled with respect for confidentiality and the rights of all involved by a dedicated, multidisciplinary cell (Deontological Cell), headed by Fluvius' legal department. This is done with the help of technical tools that facilitate the protection of whistleblowers.

There are various ways of reporting on the perception of integrity within Fluvius and compliance with the stated integrity ambition from different angles.

- In the annual Great Place To Work survey, we gauge the integrity of the company and its management: to what extent do employees experience fair treatment, respectful treatment and credible management.
- The Deontological Cell reports to management and may propose preventive actions depending on the reports received.
- Fluvius' management and Audit Committee are informed by the Internal Audit Department.

Through this continuous system of reporting and periodic review, we strive for a continuously growing awareness of the interpretation of acting with integrity within our company and for continuous improvement in the means and methods Fluvius deploys to make acting with integrity a matter for every employee.

For whistleblowers, as mentioned earlier, a full guarantee of integrity applies. For this purpose, the reporting channels are technically set up in accordance with the directive by external partner

SDworx. Complaints and/or abuses can therefore be reported with sufficient guarantees in terms of independence, confidentiality, follow-up and data protection.

In addition to setting up the reporting channel, a procedure has also been developed for following up reports. Thus, a reporting manager was appointed and the necessary information was integrated into the work regulations. Employees also received the necessary information in this regard.

The Deontological Cell is appointed in accordance with the provisions of the employment regulations:

- Head of Department Legal Management
- Head of Department or expert Labour Relations & Compensation Policies
- Employee of the Legal Management Department

The procedure for handling reports to the Deontological Cell supplements:

- Head of Department Internal Audit sits in an advisory capacity, without being part of the Deontological Cell.

Members of the Deontological Cell are always briefed and have the necessary documentation for the proper performance of their duties. Where necessary, adequate training is provided. As soon as a conflict of interest is suspected, it must be reported immediately to either the head of the Complaints Management Department or the president of the Deontological Cell so that, if necessary, the necessary measures can be taken.

The Deontological Cell investigates all types of incidents, including those related to corruption and/or bribery, within a reasonable period of time, independently and objectively. Following the same procedures, they also investigate incidents that were not reported through the whistleblower channels. The reporter always receives an acknowledgement of receipt and feedback will also be provided on the measures planned or taken as a result of the report as well as the reason for this follow-up.

Several measures are in place to protect whistleblowers from retaliation. In fact, this protection applies at two levels:

- The report can be made anonymously.
- The reporter is 'retroactively' protected by the possibility of filing a complaint with a federal coordinator (according to art. 26 of the [Act of 28 November 2022](#) on the protection of reporters of breaches of Union or national law established within a legal entity in the private sector), with the 'burden of proof that a sanction did not result from the report being made lying with the entity that took the action'.

To inform whistleblowers about this, these measures are described:

- On the [Fluvius website](#), before the report can be submitted, each time under the heading 'What protection do you get?':
  - Reporting whistleblowers Fluvius System Operator | Fluvius
  - Reporting whistleblowers Fluvius OV | Fluvius
  - Reporting whistleblowers commissioning associations | Fluvius
- In the Ethical Charter of Fluvius, with reference to the [EU Directive on protection for whistleblowers \(EU/2019/1937\) of 23 October 2019](#)
- Internally, an article describing the information on the protection of whistleblowers was published via communication channels available to all employees.

To identify which functions within Fluvius are most exposed to corruption and bribery risk, an initial analysis was carried out to determine risk profiles. The results of this are explained in [Prevention and detection of corruption and bribery \[G1-3\]](#).

# Management of relationships with suppliers [G1-2]

**Suppliers and contractors are recognised as key stakeholders within Fluvius. As a major buyer of materials and services in the value chain, Fluvius is committed to building sustainable relationships with the various current and potential partners in the value chain. After all, Fluvius wants to be a preferred partner for its suppliers in order to not only gain access to the best products and services, but where suppliers also think of the Fluvius contracts first in case of scarcity.**

## Organisation of purchasing

To get the status of 'customer of choice', in addition to a good policy in terms of 'sourcing' and a conclusive 'contract management', an overarching 'supplier management' is also present. These three capabilities go hand in hand and reinforce each other. Fluvius maintains relations with suppliers and contractors from the 'Procurement' department within the 'Grid Management' directorate.

The procurement process is a collaboration between various sub-departments, each with their own assigned role within the process.

## Technology

The Technology Department provides technical support on materials, working methods, systems and standardisation. With this focused and secured expertise, they closely monitor technological developments and select and evaluate materials and services. In collaboration with the services concerned, they assist in drawing up technical specifications, checking and evaluating modalities.

## Supplier management

The entire supplier portfolio is managed by Supplier Management, both current and potential at an overarching level with the aim of building an appropriate supplier base and maintaining healthy relationships with it according to the organisation's objectives.

## Sourcing

Sourcing provides external sources for all goods and services necessary to continue business operations at the most favourable terms.

## Contract management

Contract management is the management of individual agreements with financial implications with suppliers, with the aim of maximising the objectives of both parties during contract performance. Managing is defined as proactively monitoring compliance with all responsibilities, obligations, procedures, agreements, terms and conditions and rates set out in the contract, resolving all ambiguities, inconsistencies and gaps, managing all risks associated with the contract and taking care of desired changes to the contract.

## Purchasing Committee

At the Purchasing Committee, strategic purchasing decisions are made and contracting is confirmed before going to the Management Committee and the Board of Directors.

## Segmentation

To shape and maintain targeted relationships with suppliers, the supplier base has been segmented. The following segments stand out.

### Commercial suppliers

This segment comprises more than 95% of Fluvius' suppliers. The relationship is mainly operational/ transactional. There are enough alternatives available for these suppliers. A change of supplier is not a problem for Fluvius. The objective here is to optimise the objectives of the contract for both parties through appropriate contract management. Communication and relationship building to commercial suppliers is done, as far as possible and necessary, through the sector organisations. Other Fluvius services involved are always informed of these contacts.

### Critical suppliers

On these suppliers Fluvius is highly dependent and this dependence entails a risk. For these suppliers, a risk analysis will be done and the necessary actions set up to eliminate or mitigate this risk. The supplier management department will coordinate the actions and report to management. Periodic consultation with these suppliers will be initiated.

### Social suppliers

These suppliers come from the socio-economic sector and have official accreditation (bespoke companies). They are important for translating Fluvius' sustainability philosophy. Actions towards this segment will be determined in line with the Socially Responsible Purchasing policy.

### Key suppliers

They add significant value to operational efficiency and directly contribute fundamentally to Fluvius' current and future objectives. These suppliers provide essential products or services and cannot be thought away from our daily operations. It is not obvious to replace these suppliers. They have a clear vision of the future in the sector and it is an added value that Fluvius aligns this vision directly with them. The supplier sees Fluvius as a 'Customer of Choice' and is willing to invest in the relationship. The objective here is to enter into dialogue with these suppliers in order to anticipate the future together. In addition to coordination moments, workshops and joint projects can be organised.

Strategic coordination with the various suppliers will take place at least annually at board level. Depending on the need, this can be done individually or with several parties together. The necessary meetings will also be organised at tactical and operational level. Research will also be conducted into the right communication channels to involve these suppliers in Fluvius' operations (annual information evenings, newsletters, social media, etc.).

### Qualified suppliers

At company level, Fluvius delivers a qualification that guarantees the quality of materials and/or services provided. For grid-bound components, only qualified suppliers are allowed to participate in public tenders. Other utility companies also make use of this qualification, as they too purchase these grid-bound components. More information on the qualification and evaluation systems of suppliers and contractors and how we engage with employees in the value chain can be consulted in chapter [Workers in the value chain \[S2\]](#).

## Socially Responsible Procurement

The Flemish action plan ‘sustainable public procurement’ uses the following definition:

*‘Sustainable public procurement is the approach whereby public authorities integrate environmental, social and economic criteria **in all phases of their procurement process**, thus promoting the dissemination of environmentally-saving technologies, social innovation and the development of environmentally, socially and ethically sound products and services.’*

Fluvius takes these considerations into account in the different phases of the procurement process:

- **Description of the subject matter of the contract:** focus on the sustainable nature of the contract, leading market players to increase their commitment to sustainable solutions and/or attract market players already working sustainably to offer a solution
- **Specifications:** sustainable technical specifications related to the contract and balanced with the objectives (e.g. standards, labels, certificates, seals of approval, product sheets, ... or equivalent)
- **Grounds for exclusion:** participants may be excluded because of environmental or employment offences affecting professional integrity, a criminal conviction proportionate to the subject matter of the contract
- **Selection criteria:** technical capacity requirements (references), other selection requirements relating to environmental management or environmental management systems proportionate to the subject matter of the contract
- **Award criteria:** the contracting authority may award extra points for more sustainable proposals because of objectively established characteristics of the offer that go beyond the minimum specifications
- **Implementation criteria:** the performance conditions of a contract, independent of the award procedure (e.g. off-peak delivery, take-back of packaging waste, achievement of sustainability score, provision of sustainability data, etc.)

In order to provide insight into how to integrate sustainability in each procurement file, realise SRI ambitions and have the possibility of reporting, the **SRI ambition tool** was developed that reflects the different stages of the procurement process in ambition levels per procurement file and per domain (CO<sub>2</sub>, circularity, social economy, etc.).

Ambition level	Phase of purchasing process	Description
Basis	Grounds for exclusion	Compliance
Significant	Grounds for exclusion, selection, specifications and implementation criteria	Excluding unsustainable products, services and works according to industry standards
Growth	Grounds for exclusion, selection, specifications, implementation criteria, award criteria including sustainability targets	Encourage sustainable products, services and works to achieve significant sustainability gains or reduce negative impacts according to file-specific methods and competences
Ambitious	Grounds for exclusion, selection, specifications, implementation criteria, award criteria including sustainability targets and/or improving targets by dialogue	Maximum effort to achieve the most feasible on the retained theme. Where necessary by encouraging new solutions and innovation

All procurement files for the coming years were assessed against this tool and assigned an ambition level for different domains. During the market research and the definition of the contract, the corresponding social and environmental criteria are further elaborated to be then aligned with the ambition level to be included in the exclusion grounds, selection criteria, specifications, implementation and award criteria.

## Public procurement legislation

Public procurement legislation determines Fluvius' procurement policy. This legislation ensures that public procurement is carried out in a transparent, fair and competitive manner. As a principal, Fluvius must adhere to established procurement rules and structures. In doing so, the contract must be clearly defined, including selection and award criteria. The contractor(s) must declare their acceptance of the contract when tendering, submit an offer that meets the set requirements and criteria and be able to perform the contract according to the agreed conditions. Fluvius as principal shall ensure a fair and transparent tendering procedure in which all bidders are given equal opportunities and the evaluation of bids is objective. After awarding the most suitable candidate, the contractor will report transparently on progress and any problems in performing the contract. For each contract, a lead official will be appointed who will be considered responsible for monitoring the proper execution of the contract. Within this framework, partly because of its size, Fluvius can leverage positive impact with suppliers and contractors through setting sustainable selection and award criteria.

## Federal purchasing

The federal procurement policy aims to realise as many purchases as possible jointly in synergy with other utility operators in Brussels and Wallonia. This policy creates increased positive impact and opportunities in efficiency gains and cooperation. The main products purchased by Fluvius through this federal procurement policy are grid-related components.

## Payments

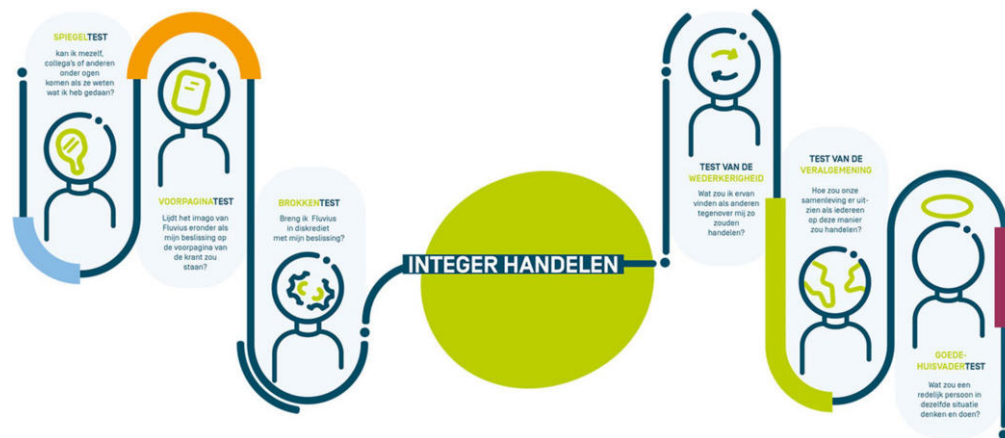
Payments to suppliers are treated according to a uniform policy regardless of the nature of the supplier (SMEs, large companies, etc.). Only on the basis of contractual agreements can this be deviated from. The payment policy states that all invoices are paid at the latest 30 days after invoice date. The payment condition is recorded in the ERP system and Fluvius is committed to adhere to it to the maximum extent possible. For more information regarding Fluvius' payment practices, please refer to section [Payment practices \[G1-6\]](#).

# Prevention and detection of corruption and bribery [G1-3]

Fluvius makes a preventive effort to prevent incidents related to corruption and bribery. The formulation of integrity guidelines [see G1-1] clearly indicates what is expected and what limits apply. This framework ensures that unethical behaviour can be prevented, smooth identification of incidents is promoted and violations can be assigned unequivocally.

Using various tools, employees are trained and get to know the integrity guidelines in an active way. Dialogue starters can be used to discuss the integrity guidelines and concrete ethical issues that arise. Various dialogue forms have been developed for which the necessary tools are available:

- **Group discussion:** Within different themes, situations are outlined in which potentially unethical behaviour could occur. Reflection questions are then posed for the group to answer.
- **Integrity speeddate:** Participants form pairs, each of which is presented with one of the guidelines. They go through it and reflect on it, then tell the text in their own words to their interlocutor and discuss an example of how this guideline is sometimes tangible in the performance of their job and how they can take it into account. At the end, a debriefing follows in which best practices are discussed.
- **Retrospectives:** This involves looking back on results and collaborations using five steps. A framework is created in which an atmosphere of trust is created. Data collection is then done both individually and in groups, after which patterns can be discovered and insights generated. These insights are translated into actions. Finally, the participants' experience during this retrospective session is gauged so that the methodology can be improved.
- **Individual self-test:** This allows one to test whether actions are ethically justified or not. Before a decision is taken, it is worth considering whether it would pass the following tests:



The members of the Deontological Cell always guarantee a neutral and independent follow-up of the report and the absence of the emergence of any conflicts of interest. If one of the members of the Deontological Cell is involved in a reported incident, the necessary procedures have been set up to continue to guarantee independence at all times. In this case, the report will be passed on to the member of the Management Committee responsible for ethics for further handling.

As also described in G1-1, management is reported on compliance with the integrity guidelines and the files handled in the Deontological Cell. They may subsequently propose additional preventive actions.



To provide a systematic assessment and analysis of Fluvius' vulnerability to corruption and bribery, risk profiles were identified according to [Transparency International's methodology](#). This should ensure a systematic approach and consistent procedure, openness, completeness and focus. The analysis was conducted for the first time in 2024 and will be further optimised in the coming years.

The main objectives of this analysis are:

- **Identification of risks:** Identifying specific areas, processes within the company that are most susceptible to corruption and bribery.
- **Evaluation of risks:** Assessing the severity and likelihood of the identified risks to prioritise risk management activities.
- **Identification of risk profiles:** Identifying key roles as risk profiles in the most high-risk areas and processes for corruption and bribery within the company.

The main functions identified as risk profiles, after taking into account measures already implemented, can be related to the following areas:

- Customer relations
- Advisory services
- Digital services
- Work management

Follow-up steps in this process may include:

- **Advising on strengthening control measures:** Advising in developing and enhancing internal controls and policies to mitigate risks and prevent corruption and bribery.
- **Awareness and training:** Increasing awareness among employees about the risks of corruption and bribery and providing targeted training to risk profiles to promote an ethical corporate culture and prevent corruption and bribery.
- **Continuous improvement:** Creating a continuous improvement process through regular reviews and updates of risk profiles based on changing circumstances and insights.

By achieving these objectives, Fluvius can control its exposure to corruption and bribery, prevent damage to its reputation, avoid legal sanctions and promote an ethical environment for its own employees and the value chain. No training is currently offered for this specific target group. As explained in [GOV-1](#), directors do receive training at the start of their tenure to help them understand their good governance obligations.

## Confirmed incidents of corruption or bribery [G1-4]

The table below shares information on the number of incidents related to corruption or bribery during 2024.

Information	Fluvius
The number of convictions and the amount of fines for violation of anti-corruption and anti- bribery laws	0 (€0)
Any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery	NA
The total number and nature of confirmed incidents of corruption or bribery	0
The number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents	0
The number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery	0

There are no public court cases pending or judgements handed down in the financial year 2024 relating to incidents of corruption or bribery against Fluvius, any of its employees or against players in the value chain directly involving Fluvius or employees of Fluvius.

Of course, it remains Fluvius' ambition to maintain all the above numbers at zero.

## Political influence and lobbying activities [G1-5]

### Political influence

For Fluvius, the legislative framework in which we work is very important. We wish to influence this in such a way that it is possible to work efficiently on energy transition and climate adaptation, as our mission, vision and strategic objectives also clearly aspire.

The 'Public Affairs' department within the 'Strategy' directorate closely monitors legislative initiatives within Fluvius, at Flemish, federal and European level. We also inform employees about this through the PA report. Where necessary, we try to weigh in on political decision-making and answer parliamentary questions in an accurate, diplomatic and timely manner. This is always done in consultation with the stakeholders involved.

Under no circumstances does Fluvius make political contributions in monetary values (financial or in kind).

Fluvius itself is not registered in the EU Transparency Register. CEDEC (European Federation of Local and Regional Energy Companies) defends our interests in this matter. They represent European distribution system operators and are known by the identification number 54829912208-85. At national level, this representation of interests is through Synergrid, known under the identification number 850726637028-25.

### Appointment of members to administrative, management and supervisory bodies after similar positions

For the appointment of members to the Boards and Committees, a review is always carried out at the time of appointment with regard to the incompatibilities provided for in the Energy Decree Article 4.1.5/1 and the Energy Decree Article 3.1. 16:

- The mandate of a director is incompatible with
  - Membership of the legislative chambers, the European Parliament, the Community and Regional Parliaments, the Assembly of Common Community Commission of Brussels-Capital, the Flemish Community Commission or the French Community Commission;
  - The function or office of minister, state secretary, or membership of a regional or community government.
- The directors nominated by the municipal shareholders may not hold any office or activity, whether paid or unpaid, for a producer, an importer of foreign natural gas, a holder of a supply licence, an intermediary, an energy service provider, an ESCO or an aggregator.

Incompatibilities are also defined for the commissioning associations, the shareholders of Fluvius System Operator, in the Decree on Local Government article 436. However, the bodies to which these incompatibilities apply are beyond the scope of this CSRD reporting.

In 2024, a number of new members were appointed to the Boards and committees of Fluvius and subsidiaries. As mentioned earlier, no incompatibilities were identified in the review at the time of appointment. Discussed below is whether they held a similar position within government departments (including supervisors) in the two years prior to their appointment. This is based on the information shared on Cumuleo, a database for mandates, offices and professions of public mandataries and senior officials. In turn, they rely on the Federal Mandate Statement as an independent source.

- [Kim Dorikens](#) was appointed in the Board of Directors, the HR Committee and the Audit Committee of Fluvius System Operator on the recommendation of Fluvius Antwerpen. In 2022 and 2023, she held no active mandates, offices or occupations published in the Federal Mandates Statement, according to Cumuleo.
- [Jean-Pierre De Groef](#) was appointed in the Board of Directors (as 3rd chairman) and the Strategic Committee of Fluvius System Operator on the recommendation of Sibelgas. In financial years 2022 and 2023, he held the following similar positions, according to Cumuleo:
  - President of the Board of Directors at IBEG - Intercommunale van Brabant voor Elektriciteit en Gas
  - Member of the Board of Directors at Sibelgas (Mandated Association)
 He also served as mayor of the Machelen municipality in 2022 and 2023.

## Lobbying activities

The main themes of Fluvius' lobbying activities are directly related to its mission, vision and strategic objectives to achieve energy transition and climate adaptation. Also in the double materiality analysis, the themes of energy and climate were placed at the top of the agenda by the stakeholders surveyed.

At each election cycle, Fluvius publishes a memorandum explaining its own positions. Several elections took place in Belgium in 2024:

- On Sunday 9 June 2024 there were European, federal and Flemish elections
- On Sunday 13 October there were provincial, municipal and district council elections

This initiates a political process where, on the one hand, its own memorandum is prepared and, on the other hand, analyses are done of stakeholders' memorandums and the various party programmes.

The Fluvius memorandum provides an overview of measures and decisions that we suggest to policymakers to achieve the mission, vision and strategic objectives for energy transition and climate adaptation. The advice in the memorandum focuses mainly on the European, federal and Flemish levels. The target audience includes:

- Political parties and their study departments
- Ministers and their cabinets
- Parliamentarians
- Stakeholders who can influence the legislative framework in which Fluvius operates (e.g. advisory bodies such as SERV, MINA Council, civil society, ...)

The content of the memorandum is freely available on the Fluvius website and was explained in detail internally to all employees during a webinar. This memorandum came about from input by the strategic steering committees and was validated by the Management Committee, and was submitted to the Strategic Committee and the Board of Directors for deeds.

The main suggestions from the memorandum are:

1. Create the preconditions necessary for the realisation of the energy transition.
2. Align decisions on the future of the gas grid with policy on the renovation rate of buildings.
3. Ensure stable market operation and pay attention to flexibility.
4. Realise the maximum potential of heat networks in Flanders.
5. Evaluate the synergy benefits between utilities.
6. Consolidate the role of municipalities as central pivot in the management of wastewater and rainwater.
7. Ensure that Fluvius can continue to carry out the tasks that are socially important and for which the right expertise and experience is available.
8. Work towards a single fast data network throughout Flanders.
9. Fund public service obligations with general resources from the Flemish government.

The common thread here is that they are all suggestions needed to realise the energy transition and climate adaptation at the lowest social cost while maintaining customer comfort.

After publication of the memorandum, political meetings will be organised with all political parties where all stakeholders dealing with the applicable matter will be present. At the same time, bilateral discussions will be held with the various other stakeholders. In addition, the SPOCs for the identified key stakeholders (see [SBM-2](#)) are urged to put the memorandum on the agenda at the next stakeholder contacts.

Once the elections are over, the various forms of government start. During this period too, Fluvius is on standby to supply information and test positions. It is our ambition to provide a quick response with a team ready with the necessary expertise 24/7.

Naturally, the final coalition agreements are also thoroughly analysed and the impact of the decision-making on Fluvius' work is evaluated.

# Memorandum Fluvius Verkiezingen 2024



**9 adviezen** voor de  
Vlaamse nutsvoorzieningen  
in de komende legislatuur

*fluvius.*

## Payment practices [G1-6]

The standard payment term within Fluvius is 30 days, unless contractually stipulated otherwise. The payment condition is recorded in the ERP system and Fluvius commits to adhere to it to the maximum extent possible. No distinction is made between payments to small and medium-sized enterprises (SMEs) and other payments to suppliers.

Certain categories of suppliers are an exception to the standard payment terms. Notwithstanding we are given six weeks to pay out green energy certificates (GSC), it was decided to pay the certificates as soon as possible after booking. To give a correct and true picture of on-time payments in reporting, the payment period for this group is adjusted to 42 days. For cash payments of invoices, the payment period is basically zero days, but due to the procedures in place for approving these payments, an immediate payment cannot be made in practice. These cash invoices will therefore not be reported as 'paid on time', but Fluvius is committed to ensuring prompt payment. Finally, for invoices received late, the payment period will start from the effective date of receipt of the invoice.

On average, Fluvius takes 33.94 days to pay an invoice from the date on which the contractual or statutory payment period starts to run. Overall, 94.07% of payments are made within the terms defined in the payment terms and determined by the assumptions. These figures include data from Fluvius System Operator and Fluvius OV (a total of 226,157 paid invoices). For De Stroomlijn, no reporting could be prepared on the timely payment of a total of 186 invoices. Given the materiality of this quantity of invoices, it is considered that integrating this data would not have a material impact on the final figures for the Fluvius Consolidated Group.

There are 0 pending legal proceedings for late payments.

# Auditor's report

Statutory Auditor's limited assurance report on the consolidated sustainability statement of Fluvius System Operator CV

320

# Statutory Auditor's limited assurance report on the consolidated sustainability statement of Fluvius System Operator CV

At the attention of the general meeting of the shareholders

As part of the limited assurance engagement on the consolidated sustainability statement of Fluvius System Operator CV (the "Company" or the "Group"), we are providing you with our report on this engagement.

We were appointed by the management on 2 October 2024 and will be retroactively appointed by the General Meeting of 14 May 2025 in accordance with the proposal of the Board of Directors following the recommendation of the audit committee and based on the recommendation of the Workers' Council of Fluvius System Operator CV, to carry out a limited assurance engagement on the Company's consolidated sustainability information, included in the CSRD statements of the annual report as of 31 December 2024 and for the year ended on that date (the "sustainability statement").

Our mandate expires on the date of the general meeting deliberating on the annual financial statements for the year ending 31 December 2025. We have carried out our assurance engagement on the sustainability statement of Fluvius System Operator CV for 1 consecutive financial year.

## Limited assurance conclusion

We have conducted a limited assurance engagement on the sustainability statement of Fluvius System Operator CV.

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the sustainability statement, in all material respects:

- Is not prepared in accordance with the requirements referred to in Article 3:32/2 of the Belgian Code of Companies and Associations, including compliance with applicable European sustainability information standards (the European Sustainability Reporting Standards ("ESRSs"));

- Is not compliant with the process carried out by the Company ("the Process") to identify the information included in the sustainability statement in accordance with the ESRS's as set out in the section "Description of the process for the identification and assessment of material impacts, risks, and opportunities (IRO-1)"; and
- is not compliant with the requirements of Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation") as disclosed in subsection "EU Taxonomy" within the environmental section of the CSRD statements.

## Basis for conclusion

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), *Assurance engagements other than audits or reviews of historical financial information* ("ISAE 3000 (Revised)"), applicable in Belgium and issued by the International Auditing and Assurance Standards Board.

Our responsibilities under this standard are further described in the Statutory Auditor's responsibilities section of our report related to our limited assurance engagement under the section "Statutory Auditor's responsibilities in relation with the limited assurance engagement on the sustainability information".

We have complied with all ethical requirements relevant to the assurance of sustainability engagement in Belgium, including those relating to independence.

The firm applies International Standard on Quality Management 1 ("ISQM 1"), which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have obtained from the Company's Board of Directors and its appointees the explanations and information necessary for our limited assurance engagement.



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

### Other matters

The scope of our work is only restricted to the limited assurance engagement on the Company's sustainability statement with respect to the current reporting period. Our assurance does not extend to information relating to the comparative figures.

### Responsibilities of the Board of Directors in relation with the preparation of sustainability information

The Board of Directors of the Company is responsible for designing and implementing a process to identify the information reported in the sustainability statement in accordance with the ESRS and for disclosing this Process in the section "Description of the process for the identification and assessment of material impacts, risks, and opportunities [IRO-1]" of the sustainability statement. This responsibility includes:

- understanding the context in which the Company's activities and business relationships take place and developing an understanding of its affected stakeholders;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the entity's financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- making assumptions that are reasonable in the circumstances.

The board of directors of the Company is further responsible for the preparation of the sustainability statement, which contains the sustainability information as determined in the Process:

- in accordance with the requirements referred to in Article 3:32/2 of the Belgian Code of Companies and Associations, including compliance with applicable ESRS's;
- in compliance with the requirement provided by Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation") as described in the disclosures in the subsection "EU Taxonomy" within the environmental section (E) of the CSRD statements.

This responsibility includes:

- designing, implementing and maintaining such internal control that the Board of Directors determines is necessary to enable the preparation of the sustainability statement that is free from material misstatement, whether due to fraud or error; and
- the selection and application of appropriate sustainability reporting methods and making assumptions and estimates that are reasonable in the circumstances.

The Board of Directors are responsible for overseeing the Company's sustainability reporting process.

### Inherent limitations in preparing the sustainability statement

In reporting forward-looking information in accordance with ESRS, the board of directors of the Company is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Company. Actual outcomes are likely to be different since anticipated events frequently do not occur as expected. Actual results are likely to differ from projections because the future events will not generally occur as expected, and such differences could be material.

### Statutory Auditor's responsibilities in relation with the limited assurance engagement on the sustainability information

Our responsibility is to plan and perform the assurance engagement to obtain limited assurance about whether the sustainability statement is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the sustainability statement as a whole.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised), as applicable in Belgium, we exercise professional judgment and maintain professional skepticism throughout the engagement. The work performed in an engagement with a view to obtaining limited assurance is less extensive than in the case of an engagement with a view to obtaining reasonable assurance. The procedures performed in a limited assurance engagement for which we refer to the 'Summary of work carried out' section which differ in nature and timing are less extensive compared to a reasonable assurance engagement. We therefore do not express a reasonable audit opinion in the frame of this engagement.

As the forward-looking information included in the Sustainability Information, and the assumptions on which it is based, relate to the future, they may be affected by events that may occur and/or by actions taken by the Company. Actual results are likely to differ from the assumptions made, as the events assumed will not necessarily occur as expected, and such differences could be material. Accordingly, our conclusion does not guarantee that the actual results reported will correspond to those contained in the forward-looking sustainability information.

Our responsibilities in respect of the sustainability statement, in relation to the Process, include:

- understanding the Process but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process; and
- Designing and performing procedures to evaluate whether the Process is consistent with the Company's description of its Process, as disclosed in note "Description of the process for the identification and assessment of material impacts, risks, and opportunities (IRO-1)";

Our other responsibilities in respect of the sustainability statement include:

- To understand the Company's control environment and the processes and information systems relevant to the preparation of sustainable information, but without evaluating the design of specific control activities, obtaining substantive information on their implementation or testing the effectiveness of the internal control measures in place;
- Identify areas where material misstatements of sustainability information are likely to occur, whether due to fraud or error; and
- Designing and performing procedures responsive to where material misstatements are likely to arise in the sustainability statement. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

### Summary of the work performed

A limited assurance engagement involves performing procedures to obtain evidence about the Sustainability statement. The procedures 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.

The nature, timing and extent of procedures selected depend on professional judgement, including the identification of disclosures where material misstatements are likely to arise in the Sustainability statement, whether due to fraud or error.

In conducting our limited assurance engagement, with respect to the Process, we:

- Obtained an understanding of the Process through:
  - Requesting information to understand the sources of the information used by management [e.g., stakeholder engagement, business plans and strategy documents], and
  - assessing the Company's internal documentation of its Process; and
- Evaluated whether the evidence obtained from our procedures with respect to the Process implemented by the Company was consistent with the description of the Process set out in the section "Description of the process for the identification and assessment of material impacts, risks, and opportunities (IRO-1)".

In conducting our limited assurance engagement, with respect to the sustainability statement, we:

- Obtained an understanding of the Company's reporting processes relevant to the preparation of its sustainability statement by:
  - Interviewing management and relevant staff responsible for consolidating and implementing internal control measures related to sustainability information;
  - when deemed appropriate, obtaining supporting documentation for the relevant reporting processes
- Evaluated whether the information identified by the Process is included in the sustainability statement;
- Evaluated the compliance of the structure and the preparation of sustainability information with ESRS standards;
- Performed inquiries of relevant personnel and analytical procedures on selected information in the sustainability statement;
- Performed substantive assurance procedures, based on a sample, on selected information in the sustainability statement;
- Evaluated assurance information on the methods for developing estimates and forward-looking information; evaluated as described in the section 'responsibilities of the statutory auditor regarding the assurance engagement with limited assurance regarding sustainability information;
- Obtained an understanding of the Company's process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the sustainability statement;

- On a sample basis, reconciled the economic activities with supporting documentation that substantiates the substantial contribution, the do not significant harm contribution, and the minimum safeguard requirements;
- Reconciled inputs to revenue, capital expenditure, and operating expenses, with underlying financial information of the Company.

### Statements regarding independence

Our audit firm and our network have not performed any engagements that are incompatible with the limited assurance engagement, and our audit firm has remained independent of the company during our term of office.

Ghent, 28 March 2025

EY Bedrijfsrevisoren BV  
Statutory Auditor  
represented by

Marnix Van Dooren\*  
Partner  
\* Acting on behalf of a BV

25MVD0102



# Financial statements

Consolidated Financial Statement IFRS  
Information concerning the parent company  
Review of reporting

# Consolidated Financial Statement IFRS

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# Financial statements

Translation - Dutch Version is binding

## Consolidated statement of profit or loss

[In thousands of EUR]	Notes	2024	2023
<b>Operating revenue</b>	3	<b>2,799,356</b>	<b>2,505,752</b>
Revenue from contracts with customers		2,718,535	2,373,350
Other operating income		80,778	132,381
Own construction, capitalized		43	21
<b>Operating expenses</b>		<b>-2,771,183</b>	<b>-2,407,287</b>
Cost of trade goods	4	-394,042	-324,198
Cost for services and other consumables	5	-1,657,694	-1,410,200
Employee benefit expenses	6	-710,076	-656,913
Depreciation, amortization, impairments and changes in provisions	7	-7,719	-12,595
Other operational expenses		-1,652	-3,381
<b>Result from operations</b>		<b>28,173</b>	<b>98,465</b>
Finance income	8	194,457	160,121
Finance costs	8	-213,454	-191,345
Share of profit (loss) of associates and joint ventures	13	-12,541	10,178
<b>Profit [loss] before tax</b>		<b>-3,365</b>	<b>77,419</b>
Income tax expenses	9	-9,176	-8,916
<b>Profit [loss] for the period</b>		<b>-12,541</b>	<b>68,503</b>

## Consolidated statement of comprehensive income

(In thousands of EUR)	Notes	2024	2023
<b>Profit for the period</b>		<b>-12,541</b>	<b>68,503</b>
<b>Other comprehensive income</b>			
<b>Items not to be reclassified to profit or loss in subsequent periods</b>			
Actuarial gains (losses) on long-term employee benefits	23	32,027	-1,713
Actuarial gains (losses) on rights to reimbursement on post-employment employee benefits	23	-32,027	1,713
<b>Net other comprehensive income not being reclassified to profit or loss in subsequent periods</b>		<b>0</b>	<b>0</b>
<b>Total comprehensive income for the period</b>		<b>-12,541</b>	<b>68,503</b>

## Consolidated statement of financial position

[In thousands of EUR]	Notes	2024	2023 [restated] <sup>1</sup>	2023 [as reported]
<b>Non-current assets</b>		<b>8,444,995</b>	<b>7,835,202</b>	<b>7,860,695</b>
Intangible assets	10	54	97	97
Property, plant and equipment	11	1,576	1,529	1,529
Right-of-use assets	12	35,470	34,739	34,739
Investment in joint ventures and associates <sup>1</sup>	13	922,076	934,617	960,110
Other investments	14, 25	912	889	889
Rights to reimbursement on post-employment employee benefits	15	121,079	153,342	153,342
Long-term receivables, other	17, 25	7,363,828	6,709,989	6,709,989
<b>Current assets</b>		<b>804,466</b>	<b>943,691</b>	<b>943,691</b>
Inventories	18	223,230	190,475	190,475
Short-term receivables, other	17, 25	233,879	18,107	18,107
Trade and other receivables	19, 25	209,385	416,744	416,744
Receivables cash pool activities	19, 25	136,888	256,740	256,740
Current tax assets	9	0	20	20
Cash and cash equivalents	20, 25	1,084	61,605	61,605
<b>TOTAL ASSETS</b>		<b>9,249,461</b>	<b>8,778,893</b>	<b>8,804,386</b>



[In thousands of EUR]	Notes	2024	2023 [restated] <sup>1</sup>	2023 [as reported]
<b>EQUITY</b>	21	<b>964,448</b>	<b>976,989</b>	<b>1,002,482</b>
<b>Total equity attributable to owners of the parent</b>		<b>964,348</b>	<b>976,889</b>	<b>1,002,382</b>
Contributions excluding capital, reserves and retained earnings <sup>1</sup>		964,348	976,889	1,002,382
<b>Non-controlling interest</b>		<b>100</b>	<b>100</b>	<b>100</b>
<b>LIABILITIES</b>		<b>8,285,013</b>	<b>7,801,904</b>	<b>7,801,904</b>
<b>Non-current liabilities</b>		<b>7,393,936</b>	<b>6,744,442</b>	<b>6,744,442</b>
Interest bearing loans and borrowings	22, 25	7,244,636	6,564,501	6,564,501
Lease liabilities	12, 25	27,945	26,498	26,498
Employee benefit liabilities	23	121,079	153,342	153,342
Derivative financial instruments	17, 25	276	101	101
<b>Current liabilities</b>		<b>891,077</b>	<b>1,057,462</b>	<b>1,057,462</b>
Interest bearing loans and borrowings	22, 25	276,742	528,500	528,500
Lease liabilities	12, 25	10,445	9,164	9,164
Trade payables and other current liabilities	24, 25	429,536	429,532	429,532
Liabilities cash pool activities	19, 25	170,392	86,647	86,647
Current tax liabilities	9	3,962	3,619	3,619
<b>TOTAL EQUITY AND LIABILITIES</b>		<b>9,249,461</b>	<b>8,778,893</b>	<b>8,804,386</b>

<sup>1</sup> The final accounting treatment of the business combination in Wyre Holding bv has now been completed within the applicable period of 12 months. The impact on the reported financial statements as at 31 December 2023 amounts to -25,493k EUR on the items '13 Investments in associates and joint ventures' and '21 Equity'.

## Consolidated statement of changes in equity

(In thousands of EUR)	Contributions excluding capital	Reserves	Retained earnings	Equity attributable to owners of the parent	Non-controlling interest	Total
<b>Balance at 1 January 2023</b>	<b>1,284</b>	<b>213</b>	<b>20</b>	<b>1,517</b>	<b>100</b>	<b>1,617</b>
Result for the period	0	0	68,503	<b>68,503</b>	0	<b>68,503</b>
Issue of Equity	496,483	526,625	0	<b>1,023,108</b>	0	<b>1,023,108</b>
Addition (decrease) reserves	127	-22,370	22,243	<b>0</b>	0	<b>0</b>
Dividends	0	0	-90,746	<b>-90,746</b>	0	<b>-90,746</b>
<b>Changes in Equity</b>	<b>496,610</b>	<b>504,255</b>	<b>0</b>	<b>1,000,865</b>	<b>0</b>	<b>1,000,865</b>
<b>Balance at 31 December 2023</b>	<b>497,894</b>	<b>504,468</b>	<b>20</b>	<b>1,002,382</b>	<b>100</b>	<b>1,002,482</b>
Adjustment <sup>1</sup>	0	-25,493	0	<b>-25,493</b>	0	<b>-25,493</b>
<b>Balance at 31 December 2023 (restated)</b>	<b>497,894</b>	<b>478,975</b>	<b>20</b>	<b>976,889</b>	<b>100</b>	<b>976,989</b>
<b>Balance at 1 January 2024</b>	<b>497,894</b>	<b>478,975</b>	<b>20</b>	<b>976,889</b>	<b>100</b>	<b>976,989</b>
Result for the period	0	0	-12,541	<b>-12,541</b>	0	<b>-12,541</b>
Addition (decrease) reserves	0	-12,541	12,541	<b>0</b>	0	<b>0</b>
<b>Changes in Equity</b>	<b>0</b>	<b>-12,541</b>	<b>0</b>	<b>-12,541</b>	<b>0</b>	<b>-12,541</b>
<b>Balance at 31 December 2024</b>	<b>497,894</b>	<b>466,434</b>	<b>20</b>	<b>964,348</b>	<b>100</b>	<b>964,448</b>

<sup>1</sup> The final accounting treatment of the business combination in Wyre Holding by has now been completed within the applicable period of 12 months. The impact on the reported financial statements as at 31 December 2023 amounts to -25,493k EUR on the items '13 Investments in associates and joint ventures' and '21 Equity'.

## Consolidated statement of cash flows

(In thousands of EUR)	Notes	2024	2023
Profit (loss) for the period		-12,541	68,503
Amortization of intangible assets	7, 10	43	332
Depreciation on property, plant and equipment and right-of-use assets	7, 11	10,884	11,246
Impairment current assets (Reversal -; Recognition +)	7	-3,208	1,017
Gains or losses on realization receivables		1,131	1,600
Net finance costs		18,821	30,420
Share of profit (loss) of associates and joint ventures	13	12,541	-10,178
Change in fair value of derivative financial instruments		175	804
Gains or losses on non-current assets		1	-59,573
Income tax expense	9	9,176	8,916
Change in inventories	18	-32,755	-28,620
Change in trade and other receivables		277,946	-67,144
Change in trade payables and other current liabilities		-33,747	5,996
Interest paid		-173,761	-148,572
Interest received		155,930	133,476
Financial discount on debts		573	314
Income tax paid (received)	9	-8,814	-8,379
<b>Net cash flow from operating activities</b>		<b>222,395</b>	<b>-59,842</b>
Proceeds from sale of property, plant and equipment		0	9
Purchase of property, plant and equipment		-495	-476
Net investments in long-term receivables		-222	-99
<b>Net cash flow used in investing activities</b>		<b>-717</b>	<b>-566</b>

[In thousands of EUR]	Notes	2024	2023
Repayment of borrowings	22	-3,500	-753,500
Proceeds from borrowings	22	197,764	32,000
Proceeds from bonds/borrowings	22	696,367	1,427,225
Payment of finance lease liabilities	12	-11,455	-11,676
Change in current financial liabilities	22	-466,972	225,000
Change in cash pool	19	203,597	-13,434
Provide long-term loans	17	-898,000	-1,472,000
Repayment long-term loans	17	0	700,000
Dividends paid	21	0	-90,746
<b>Net cash flow from/used in financing activities</b>		<b>-282,199</b>	<b>42,869</b>
<b>Net increase/decrease in cash</b>		<b>-60,521</b>	<b>-17,539</b>
<b>Cash and cash equivalents at the beginning of period</b>	<b>20</b>	<b>61,605</b>	<b>79,144</b>
<b>Cash and cash equivalents at the end of period</b>	<b>20</b>	<b>1,084</b>	<b>61,605</b>

# Notes to the consolidated financial statements

## 1 Corporate information

Fluvius System Operator cv, abbreviated Fluvius, a partnership ('coöperatieve vennootschap'/société coopérative) under Belgian law, is registered in Belgium, at Brusselsesteenweg 199, 9090 Melle. It is registered under number 0477.445.084 in the central enterprise register of Ghent (section Ghent).

Fluvius System Operator Group's consolidated financial statements for the year ended 31 December 2024 contain the information of the parent company Fluvius System Operator cv and its subsidiary, investments in joint ventures and associates - De Stroomlijn cv, Wyre Holding bv (see note '13 Investments in associates and joint ventures'), Atrias cv and Synductis cv - and together they form the 'Group'.

Fluvius System Operator is the **independent multi-utility company** responsible for operating the distribution grids for electricity and natural gas; developing, operating, using and maintaining other pipeline-related utilities such as sewerage, water, public lighting; public electronic communication networks; heat; data traffic; the management of heat and cold storage; exercising ancillary activities including the management of (strategic) participations; management and recording of metering data and managing the access register; carrying out tasks as a social energy supplier; and providing support to its shareholders, the local authorities in Flanders.

Fluvius carries out these tasks on behalf of and for the account of its **shareholders**, eleven intermunicipal associations or '**Mission Entrusted Associations**' (MEAs): Fluvius Antwerpen, Fluvius Limburg, Fluvius West, Gaselwest, Imewo, Intergem, Iveka, Iverlek, PBE, Riobra and Sibelgas.

The grid assets themselves remain owned by the MEAs. The MEAs, active in the distribution of electricity and gas are also the holders of the licences to distribute electricity and gas granted by the Flemish energy regulatory authority, VREG. As from 1 January 2025, VREG has been renamed Vlaamse Nutsregulator (VNR - Flemish Utility Regulator). Fluvius' sewerage business is also regulated in Flanders, namely by the VMM (Flemish Environmental Agency); this regulatory competence is expected to be transferred to VNR as from 1 January 2026.

Fluvius **operates in all cities and municipalities in the Flemish Region (Belgium)**.

The company carries out its operational activities **at cost price** without charging any commercial margin to the Mission Entrusted Associations. This means that all costs incurred are passed through to the MEAs according to fixed allocation rules. On a monthly basis, Fluvius System Operator invoices each of the MEAs for the operational services rendered. The result of the Group is without profit or loss, with the exception of the participation in Wyre Holding bv for the public electronic communications networks activities.

Fluvius System Operator's shareholders, together with this 'Group', Fluvius OV, Transco Energy cv and Interkabel Vlaanderen cv (until June 2023) form the '**Economic Group Fluvius**', which also publishes its IFRS financial statements.

The Flemish energy regulator VREG has granted permission to the distribution system operators for energy Fluvius Antwerpen, Fluvius Limburg, Fluvius West, Gaselwest, Imewo, Intergem, Iveka, Iverlek, PBE and Sibelgas to call on the services of the **operating company** Fluvius System Operator for electricity and gas. These authorisations shall apply until 25 September 2026 (electricity) and 14 October 2027 (gas) respectively. The term 'distribution system operator' (DSO) refers to MEAs that provide the regulated activities for the distribution of electricity and/or gas, under the supervision of VREG.

The Flemish Energy Decree stipulates that each MEA can call on only one operating company. All MEAs of the 'Economic Group Fluvius' have chosen Fluvius System Operator cv for this purpose. The latter can carry out its tasks with its own staff and can call upon statutory (permanent) staff via secondment.

On 1 April 2019, all contractual staff of the ex-Infrac MEAs and ex-Integan were taken over by Fluvius System Operator cv. In order to have the secondment take place via one company, all statutory staff of the ex-Infrac MEAs and ex-Integan were transferred to Fluvius OV.

The Group employed on average 5,462 full-time equivalent persons during 2024 and called on 615 full-time equivalent persons on average that are employed in Fluvius OV.

Fluvius has chosen to obtain a rating from the rating agency 'Moody's Investor Services Ltd.' (Moody's). Further information is included in the note '25 Financial instruments: policy and fair value'.

For more information, visit our website [www.fluvius.be](http://www.fluvius.be).

This financial report for the financial year ended 31 December 2024 was approved on 26 March 2025 by the Board of Directors.

## 2 Summary of significant accounting policies

### 2.1 Statement of compliance and basis of presentation

The consolidated financial statements have been prepared in accordance with IFRS (International Financial Reporting Standards) accounting standards, as published by the International Accounting Standard Board (IASB) and endorsed by the European Union. The Group has not early adopted any new IFRS accounting standard that is effective after 2024.

The consolidated financial statements are expressed in thousands of euro, which is the functional currency and presentation currency of the Group. They have been prepared with the assumption that business activities will be continued and under the historical cost convention method unless otherwise stated.

### 2.2 Principles of consolidation

The consolidated financial statements comprise all subsidiaries over which the Group has control.

There is control when the Group has the power to direct the financial and operating policies of the entity so as to obtain benefits from its activities. Such a form of control is supposed to exist if the parent, directly or indirectly, holds more than half of the voting rights in the entity. The existence and impact of potential voting rights that were exercisable or convertible at that time, are being taken into consideration when judging whether the Group has the control to determine the financial and operating policies of another entity.

Subsidiaries are fully consolidated from the date on which the Group obtains control until the date on which control ends.

Investments in associates are companies in which a significant influence is exercised over the financial and operational policy, but over which there is no control. There is a rebuttable presumption of significant influence when 20% or more of the voting shares are held directly or indirectly.

Joint ventures are companies over which joint control is exercised. These investments are accounted for in the consolidation using the equity method as from the date on which that significant influence or joint control is obtained until the date on which the significant control or joint control ceases.

The financial reporting of the subsidiaries, investments in joint ventures and associates is prepared for the same reporting year as that of the parent company, using consistent accounting principles.

All intercompany transactions, balances and unrealized gains and losses between group companies are eliminated.

Non-controlling interest in the net assets of the consolidated subsidiaries has been individually reported in equity of the parent company. Non-controlling interest consists of the amount of that interest at the acquisition date and the non-controlling share in the equity changes since the date of the business combination. Realised and unrealised results are allocated to group and minority interests even if this would result in negative minority interests.

An overview of the Group's subsidiaries is set out in note '29 List of group entities included in the consolidation'.

### 2.3 Significant accounting policies

The accounting policies are applied consistently compared to last year's accounting.

#### 2.3.1 Revenue recognition Revenue from contracts with customers

The main revenue stream of the Group results from the passing on of *costs to mission entrusted associations* in the context of its role.

The revenue generated by the passing through of these costs on to the mission entrusted associations is recognised when the costs are incurred. The costs incurred are charged on a monthly basis to the mission entrusted associations, being the shareholders.

The revenue stream from construction works for third parties includes various works performed for third parties for investment works and operating works.

The proceeds from construction works for third parties are valued on the basis of the remuneration which the Group expects to be entitled to as a result of the contract. The Group recognizes revenue once the performance obligations have been met, namely when the control is transferred to the customer. Revenue recognition follows the specific five-step model. Step 1 in this model is the identification of the contracts with the client; step 2 the identification of the obligations in the performance contracts; step 3 the determination the transaction price; step 4 the allocation of the transaction price to the performance obligations and revenue recognition and step 5 when the performance obligations have been fulfilled.

### Other operating revenue

Other operating income includes various service recoveries and recovery of general expenses. For the recovery of services, revenue is recognised when the products are delivered to the customer, the customer has accepted the products and collectability of the related receivables is reasonably assured.

### Finance income

Finance income includes mainly interest realized from lending on funds from the bond issuances, European Investment Bank loans and from the cash pool activities. This interest is recognized when acquired and for the period to which it refers (taking into account the asset's effective interest rate), unless collectability is doubtful.

### 2.3.2 Expenses

Expenses are recognized in the statement of profit or loss in the year in which they occur.

*The finance costs* include interests on loans, calculated using the effective interest rate method, and bank charges. All interest and other costs incurred in connection with financial transactions such as hedging options are recognized as financial expenses when they occur.

### 2.3.3 Property, plant and equipment

Property, plant and equipment is measured at historical cost less accumulated depreciation and impairment losses. The historical cost comprises the initial purchase price and any costs directly attributable to bringing the asset to the condition necessary for it to be operational in the manner intended by management.

### Depreciation

Depreciation is recognized on a monthly basis in the statement of profit or loss on a straight-line basis as of the month following the date of bringing into use. Depreciation is calculated over the estimated useful life of each component of an item of property, plant and equipment and depreciation is assessed for reasonableness each year.

The expected useful life and depreciation method are reviewed every financial year and adjusted prospectively if necessary.

The annual depreciation rates of property, plant and equipment based on the expected useful life are as follows:

### Installation, machinery and equipment

Equipment and machinery	10.00%
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### Furniture and vehicles

Furniture	10.00%
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Office equipment	20.00%
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Hardware	20.00% and 33.33%
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### Others

Leasehold improvement	11.12%
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### Impairment

For each of the Group's property, plant and equipment it is assessed on each statement of financial position date whether there are any indications of impairment for a particular asset. If any such indications exist, the recoverable amount of the asset has to be estimated.

Impairment has been recognized if an asset's carrying amount exceeds its expected recoverable value.

### 2.3.4 Leasing

#### Right-of-use asset

The annual depreciation rates of leasing are as follows:

Buildings	11.11% up to 33.33%
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Installations, machinery and equipment	20.00%
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Furniture and vehicles	20.00%
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### Lease liabilities

#### Short-term leases and leases of low-value assets

The Group applies the short-term lease recognition exemption to its short-term leases with a lease term of 12 months or less from the commencement date and which do not contain a purchase option. It also applies the lease of low-value assets recognition exemption to leases with a value below 5,000 euro.

Lease payments on short-term leases and leases of low-value assets are recognized as expenses on a straight-line basis over the lease term.

### 2.3.5 Investments in associates and joint ventures

Investments in an associate and joint venture are recognised using the equity method and initially measured at cost. The carrying amount of the investments is adjusted to reflect changes since the acquisition date in the Group's share of the net assets of the joint venture or associate.

Goodwill relating to the associate or joint venture is included in the carrying amount of the investment and is not tested for impairment separately. Impairments and reversals are presented within 'Share of profit (loss) of associates and joint ventures' in the statement of profit or loss.

The Group's share of the results of an associate and joint venture is recognised in the Group's income statement and reported on the item 'Share of profit (loss) of associates and joint ventures'. This share of result is not part of operating profit and represents the profit/loss for the reporting period of the associate and joint venture.

### 2.3.6 Inventories

#### Inventories include only consumables.

The cost of inventories includes all costs of purchase and other costs incurred in bringing the inventories to their present location and condition.

Inventories are measured at purchase cost. Their value is determined using the moving weighted average method.

An impairment is carried out for consumption goods or necessities that, due to their obsolescence, are no longer usable for operational purposes or of which the estimated sale price is below the net realizable value. If items of inventory have not been used for more than a year, an impairment loss of 100,00 % is recorded.

Given the specificity, an impairment test is performed on the stock items destined for public lighting based on stock rotation.

These impairments are recognised as an expense in the income statement.

### 2.3.7 Trade and other receivables

Trade and other receivables are measured at their amortized cost.

The Group has a relatively low risk regarding invoices to Mission Entrusted Associations due to the support they receive from the Flemish Government. These receivables do not contain a financing component. For these receivables and the long-term and short-term receivables from the Mission Entrusted Associations, an alternative approach is used to calculate a possible write-down. This involves evaluating the probability of default of the counterparty - to which the receivable relates

- multiplied by the potential non-recoverable loss. This percentage is applied to the outstanding receivables to determine a possible write-down.

For the external customer group, a provision for doubtful debts is accrued based on the expected future losses and from the moment the receivable arises. The Group applies the simplified approach (simplified approach, expected lifetime of credit losses) for calculating the expected credit loss (ECL). Receivables for which the risk of non-recovery is higher are analysed at their full maturity.

The impairment losses are recognized in the statement of profit or loss.

### 2.3.8 Assets held for sale

The Group classifies assets and disposal groups as held for sale if their carrying amounts will be recovered principally through a sale transaction rather than through continuing use. Assets and disposal groups classified as held for sale are measured at the lower of their carrying amount and fair value less costs to sell.

The criteria for the classification 'held for sale' is regarded as met only when the sale is highly probable, and the asset or disposal group is available for immediate sale in its present condition.

Actions required to complete the sale should indicate that it is unlikely that significant changes to the sale will be made or that the decision to sell will be withdrawn. Management must be committed to the plan to sell the asset and the sale expected to be completed within one year from the date of the classification.

Assets and liabilities classified as 'held for sale' are presented separately as current items in the statement of financial position.

### 2.3.9 Loans and borrowings

Interest bearing loans are recognized initially at their fair value less related transaction expenses.

Subsequent to initial recognition, interest bearing loans are valued at amortized cost, in which any difference between the proceeds and the reimbursement is charged to the statement of profit or loss using the effective interest method over the maturity of the loans.

### 2.3.10 Employee benefit liability

All pension liabilities are annually valued by a qualified actuary.



### Pension plans and other post-employment benefits

The contributions for defined contribution plans have been recognized as an expense at the moment when incurred. The provision for defined contribution pension plans is valued according to the 'Projected Unit Credit' method (PUC) without projection of the future premiums with a variable yield. The employer's portion of the pension plan Enerbel is calculated according to the PUC method with projection of the future premiums. The contribution by the employee is still calculated via the PUC method without projection of the future premiums as the employees' contributions do not depend on seniority.

The amount recognized in the statement of financial position is the difference between this provision and the fair value of plan assets.

The Group's liabilities for the defined benefit plans, as well as for the subsequent costs, have been valued on the basis of the 'Projected Unit Credit' method. The amount recognized in the statement of financial position represents the present value of the pension liabilities (Defined Benefit Obligation) mentioned, less the fair value of plan assets.

Remeasurements comprise actuarial gains and losses, and the return on plan assets (excluding interest) which is reflected in the statement of financial position with a charge or credit recognized in other comprehensive income in the period in which they occur. They are included in the statement of comprehensive income as items not to be reclassified to profit or loss in subsequent periods.

Past service costs are recognized in the statement of profit or loss in the period of a plan amendment.

Net interest is calculated by applying the discount rate at the beginning of the period to the net defined benefit liability.

The amounts recognized in the statement of profit or loss comprise service costs (including current service costs, past service costs, gains and losses on other long-term employee benefits as well as curtailments and settlements), net interest expense.

The Group presents the first two components of the defined benefit costs in the statement of profit or loss on the line item 'Employee benefit expenses' and 'Other financial results'.

### Other long-term employee benefits

Other long-term employee benefits contain provisions for retirement and jubilee bonuses, deferred leave and overtime.. These benefits are treated in the same manner as pension plans. However,

past service costs and actuarial gains and losses have immediately been recognized in the statement of profit or loss.

### Right to reimbursement on post-employment employee benefits

A right of reimbursement on post-employment employee benefits is recognized as an asset, since it is absolutely certain that another party (the shareholders, Mission Entrusted Associations) will take over all obligations relating to the personnel rights of the company's employees or retired employees.

The reimbursement rights are therefore recognized at the same value as the recognized employee benefit liabilities (fair value). The adjustments in the period as a result of changes in the assumptions or experience adjustments are all recognized as other comprehensive income as well as these adjustments for the reimbursement rights.

### 2.3.11 Derivative financial instruments

The Group uses derivative financial instruments (Interest Rate Swaps - IRS) to hedge the exposure to interest rate risks that arise from its financing activities. Derivative financial instruments are initially recognized at fair value. The gain or loss resulting from fluctuations in the fair value is immediately accounted for through the statement of profit or loss. The fair value of the interest rate swap was the estimated amount the Group would receive or pay to end the swap at the balance sheet date, taking into account the actual interest rate and the creditworthiness of the counterparty.

The Group does not qualify for hedge accounting.

### 2.3.12 Trade and other liabilities

Trade and other liabilities are initially measured at their fair value and after initial recognition at amortized cost.

### 2.3.13 Taxes

#### Taxes payable

Taxes payable include the expected tax liability on the year's taxable income and adjustments to tax liabilities of previous years. For the calculation of the taxes on the taxable income of the year, the tax rates used were those enacted (or substantially enacted) by the end of the reporting period.

#### Taxes on the result

Taxes on the result of the financial year comprise the tax expense payable. Income tax is recognized in the income statement. Current tax expense is the expected tax payable on the taxable income for the year, based on tax rates prevailing on the balance sheet date, and any adjustment to tax payable in prior years.

## 2.4 Summary of changes in accounting policies applicable as from 2024

The new standards and interpretations that are applicable from 1 January 2024 and do not affect the consolidated financial statements of the Group were the following:

- Amendments to IAS 1 *Presentation of Financial Statements* – Classification of Liabilities as Current or Non-current (the 2020 amendments and 2022 amendments)
- Amendments to IAS 7 Statement of Cash Flows and IFRS 7 Financial Instruments: Disclosures
- Amendments to IFRS 16 *Leases*: Lease Liability in a Sale and Leaseback

## 2.5 Use of estimates and judgments

The preparation of the consolidated financial statements in conformity with IFRS accounting standards requires management to make judgments, estimates and assumptions that affect the reported amounts of assets and liabilities, and the amounts of revenue and expenses.

The estimates and the underlying assumptions have been based on past experience and several other factors that are believed to be reasonable given the circumstances. The results thereof form the basis for the judgment on the carrying amount of assets and liabilities that could not be deduced in a simple way from other sources. The actual results could differ from these estimates.

The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period in which the estimate is revised, if the revision affects only that period, or the period of the revision and future periods, if the revision affects both current and future periods.

### Pensions and other post-employment benefit plans

The cost of the pension plans and other long-term employee benefits and the present value of the pension obligation are determined using actuarial valuations. This involves making various assumptions that may differ from actual developments in the future. Due to the complexity of the actuarial calculations and the long-term nature of the obligation, the defined benefit obligation is highly sensitive to changes in the assumptions. The major assumptions and the sensitivity analysis are disclosed in the note 'Pensions and other post-employment benefit plans'.

### Right of use assets and lease liabilities

Defining the lease period of contracts with renewal options:

The Group determines the lease term as the non-cancellable term of the lease, together with any periods covered by an option to extend the lease, if it is reasonably certain to be exercised.

The Group has the option, under some of its leases (rent of buildings), to lease the assets for additional terms of three to five years. The Group applies judgment in evaluating whether it is reasonably certain to exercise the option to renew. That is, it considers all relevant factors that create an economic incentive for it to exercise the renewal. After the commencement date, the Group reassesses the lease term if there is a significant event or change in circumstances that is within its control and affects its ability to exercise (or not to exercise) the option to renew. If the renewal option is reasonably certain to be exercised, this lease term is included.

### Fair value of financial instruments

The following methods and assumptions have been used to estimate the fair values (see note '25 Financial instruments: policy and fair value'): Cash and short-term deposits, trade receivables (after deduction of provisions), trade payables and other current liabilities approximate the carrying amounts as to the short-term maturity of these instruments.

The fair value of the unquoted other investments is based on the latest available financial information.

The derivative financial instruments are interest rate swaps. The valuation techniques are swap models that use fair value calculations. The models include various kinds of input including forward prices, yield curves that are obtained on the basis of market interest rates and derivatives from market prices of various financial products that are requested with various market participants.

The fair value of the quoted bond loans is based on the indicative quotations on Bloomberg (Bloomberg is a prominent provider of business and financial market news. It delivers world economic news, quotes for stock futures, stocks and other) at the reporting date.

### Conflict in Ukraine

The Group has no operations in Ukraine or Russia, so there are no direct financial consequences. As a result of the war in Ukraine, the energy transition was accelerated, increasing the demand for materials and equipment and decreasing the supply of materials and equipment. Fluvius makes every effort to make good agreements with suppliers and contractors and strives for a long-term perspective.

### Economic volatility

Current economic conditions are marked by stabilised inflation and continued high interest rates, with an inverse yield curve for short-term interest rates, affecting the cost of (re)financing. The Group actively anticipates these economic conditions by maintaining a balanced mix of short-term and long-term funding to maintain flexibility and mitigate liquidity risks. At the end of 2023, the Group had significant short-term funding outstanding, but due to expected expenditures and higher short-term interest rates in 2024, additional long-term funding proved necessary. As in 2023, the Group is taking into account the impact of these economic conditions on cost items, including the increased discount rate for employee benefits.

## Energy transition and climate-related targets<sup>1</sup>

Aligned with the material impacts, risks and opportunities related to climate change as reported in our CSRD statements, Fluvius delivers significant efforts to realise the energy and climate transition in Flanders. Fluvius itself also has the ambition to become climate neutral in 2050. This ambition is segmented according to our (in)direct impact:

- For the core and supporting activities, we speed up our targets to climate neutrality in 2040 (scope 1&2)
- For the full value chain, we maintain the target of climate neutrality in 2050 (scope 3)

As reported in the [Investments](#) within the [Transition plan for climate change mitigation \(E1-1\)](#) in the CSRD statement, several investment plans are in place.

- [Investment plan energy transition 2024-2033](#): We choose 'no regret'-investments in our electricity grids and a 'keep it running' strategy for our gas grids. In this way, we do not experience problems in the short term and avoid overinvesting. The current planned investments cover a budget of 4 billion euros, of which 3 billion euros is allocated to reinforcing the low voltage electricity distribution grid and one billion euros to the high voltage electricity distribution grid. For our gas grids, Fluvius ensures a reliable and safe supply of energy. We limit our investments in the gas grids when possible. In the following of the termination of a number of policies and investment programmes (roll out of digital metering for gas, conversion from low-calorific to high-calorific gas), the investment budget for gas will continue to decrease.
- [Investment plan climate adaptation 2024-2033](#): Fluvius invests as a sewerage grid operator in 87 Flemish cities and municipalities in reinforcing the sewerage infrastructure. We increase the capacity of the system, the connection ratio and the avoided pollution load on water bodies. In this way, we become more resilient for the effects of climate change, we prevent pollution of water bodies and contribute to the reduction targets imposed by the European Directive for Water and the Flemish Decree of Integral Water Policy. With a total investment of 1.69 billion euros for the coming ten years, Fluvius delivers a significant contribution to the resilience of sewerage infrastructure in Flanders.
- [Investments Fluvius climate neutral](#): The decarbonisation plan of Fluvius demands investments in both the core & supporting activities and in the emission streams of the value chain. These investments are closely related to already provided operational resources and investments. They rather generate an added cost than an stand-alone cost. That is why today, it is not easy to determine a dedicated investment budget for the decarbonisation of Fluvius or to appoint a clear link with our [EU Taxonomy](#) results. In 2025, we will refine our budget for decarbonisation and will work on a best effort estimate.

The future of our gas grids impacts both our Investment plan for the energy transition as the ambition of Fluvius to become climate neutral in 2050. The Flemish government already imposed

a number of measures that will ensure a decrease of the gas consumption, but no regulatory indications show a full exit of gas. The future of the gas grids heavily relies on future policy decisions. Fluvius investigates different possible scenarios to map out the technical and financial impacts and to start the dialogue with stakeholders on this topic. Fluvius also preserves a budget for research and participation in pilote projects for new low-carbon gases as biomethane and green hydrogen.

## 2.6 Standards issued but not yet effective

The standards, amendments to standards and interpretations that were issued but not yet effective on the publication date of the Group's consolidated financial statements are not expected to have a significant impact on the Group's consolidated financial statements. The Group intends to adopt these standards and interpretations, if applicable, when they become effective.

- Amendments to IAS 21 *The Effects of Changes in Foreign Exchange Rates*: Lack of Exchangeability, effective 1 January 2025
- Amendments to IFRS 9 Classification and measurement requirements and IFRS 7 Disclosures, effective 1 January 2026<sup>2</sup>
- Amendments to IFRS 9 and IFRS 7 - *Contracts Referencing Nature-dependent Electricity*, effective 1 January 2026<sup>2</sup>
- Annual Improvements Volume 11<sup>2</sup>
- IFRS 18 *Presentation and Disclosures in Financial Statements*, effective 1 January 2027<sup>2</sup>
- IFRS 19 *Subsidiaries without Public Accountability: Disclosures*, effective 1 January 2027<sup>2,3</sup>

<sup>1</sup> *The investments mentioned are not investments that generate assets with Fluvius System Operator Group, but belong to the operational activities of Fluvius System Operator, executed for its shareholders, which impacts the recharging costs [see note 'Working for our shareholders, the mandated associations [see page 11]'].*

<sup>2</sup> *Not yet endorsed by the EU at 23 December 2024*

<sup>3</sup> *EU endorsement effective date still open*

## 2.7 Segment reporting

The Management Committee, responsible for the day-to-day management and operational operation of Fluvius System Operator (Fluvius SO) and its subsidiary, joint ventures and associates, is informed of the financial data on the basis of reporting in accordance with Belgian accounting principles. This reporting includes all costs generated by the operating company for the Flemish Mission Entrusted Associations.

Through an allocation system these costs, passed on to the Flemish MEAs and invoiced to third parties, can be broken down by product type such as electricity, gas and other (including sewerage, public electronic communications networks, telecom, public lighting). The segmentation of the revenue from contracts with customers as shown below, is based on Belgian accounting principles.

(In thousands of EUR)	Electricity	Gas	Other	BEGAAP consolidated	IFRS
31 December 2024	1,873,704	410,028	438,333	2,722,065	2,718,535
31 December 2023	1,557,378	404,639	402,181	2,364,198	2,373,350

All the Group's transactions take place in Flanders, Belgium.

# Performance of the year

## 3 Operating revenue

(In thousands of EUR)	2024	2023
Recharge of costs to the distribution system operators	2,564,581	2,212,427
Construction works for third parties	153,954	160,923
<b>Revenue from contracts with customers</b>	<b>2,718,535</b>	<b>2,373,350</b>
<b>Other operating revenue</b>	<b>80,778</b>	<b>132,381</b>
<b>Own construction capitalized</b>	<b>43</b>	<b>21</b>
<b>Total</b>	<b>2,799,356</b>	<b>2,505,752</b>

Operating revenue amounts to 2,799,356 k EUR at 31 December 2024 and 2,505,752 k EUR at 31 December 2023, an increase of 293,604 k EUR.

### Revenue from contracts with customer

The income from **recharging costs to the MEAs** amounted to 2,564,581 k EUR at the end of 2024 and 2,212,427 k EUR at the end of 2023, an increase of 352,154 k EUR.

This increase is the result of the increased costs (see notes 4 to 7), which are passed on in full to mainly the MEAs.

Indeed, within the framework of the main assignment of Fluvius System Operator, tasks are performed for its shareholding MEAs and the associated costs are passed on to these shareholders at cost. Revenues therefore reflect the costs resulting from this transaction (see note '26 Related parties').

The billing of **'Construction works for third parties'** amounts to 153,954 k EUR (2023: 160,923 k EUR) and contain mainly the interventions for investment works for third parties and various works executed by De Stroomlijn for its shareholders.

Below is the detail of the pass-through to the major customers (mainly MEAs) generating more than 10% during the period:

Company	2024		2023	
	Revenue in k EUR	% relative to revenue	Revenue in k EUR	% relative to revenue
Gaselwest	328,286	12.1%	269,682	11.4%
Imewo	426,208	15.7%	387,439	16.3%
Iverlek	357,692	13.2%	299,412	12.6%
Fluvius Limburg	453,997	16.7%	394,779	16.6%
Fluvius Antwerpen	381,514	14.0%	315,093	13.3%
Other	770,838	28.3%	706,945	29.8%
<b>Total</b>	<b>2,718,535</b>	<b>100.0%</b>	<b>2,373,350</b>	<b>100.0%</b>

### Other operating revenue

The **'Other operating revenue'** mainly comprises recoveries (2024: 65,513 k EUR; 2023: 56,504 k EUR) from operating activities, including connections (2024: 25,424 k EUR; 2023: 21,641 k EUR), the recovery of general costs such as the installation of the digital meter, groundworks in synergy and supervision whereby the other utility companies are charged for their respective share (2024: 27,404 k EUR; 2023: 20,509 k EUR) as well as recoveries from employees (2024: 12,141 k EUR; 2023: 11,091 k EUR). This item also includes recoveries for overdue prosumer tariffs (2024: 2,576 k EUR; 2023: 1,048 k EUR) and insurance claim recoveries (2024: 10,833 k EUR; 2023: 10,302 k EUR). In addition, a result of 59,915 k EUR in 2023 as a result of the Wyre transaction (see note '13 Investments in associates and joint ventures') is also included.

## 4 Cost of trade goods

Trade goods, raw materials and consumables amount to 394,042 k EUR on 31 December 2024 and 324,198 k EUR on 31 December 2023, an increase of 69,844 k EUR.

[In thousands of EUR]	2024	2023
Purchase of consumables	425,582	354,419
Inventory movements	-31,702	-30,813
Other	162	592
<b>Total</b>	<b>394,042</b>	<b>324,198</b>

Purchases of consumables increased by 70,387 k EUR or +21,8%. This increase is mainly due to the increasing activities related to the energy transition and the price increases in 2024 (rising inflation).

## 5 Cost for services and other consumables

[In thousands of EUR]	2024	2023
Cost contractors for grid construction and maintenance	866,157	688,627
Subsidy for rational use of energy (RUE)	295,304	268,910
Consultancy and other services	171,476	153,112
Management costs of enterprises	48,570	41,700
Cost for direct purchases	87,132	83,114
Fee for usage various equipment and installations	59,059	47,449
Use of the public domain	16,697	18,370
Contractual compensations	15,677	13,532
Licensing costs	28,406	22,479
Advertising, information, documentation, receptions a.o.	9,471	10,439
Short-term or low-value lease	4,890	5,149
Utilities and fuel costs	14,042	22,405
Communication costs	12,665	10,621
Insurances	5,508	4,389
Transport, travel, and representation costs	6,113	5,617
Professional fees	7,077	5,606
Other	9,450	8,681
<b>Total</b>	<b>1,657,694</b>	<b>1,410,200</b>

Cost for services and other consumables amount to 1,657,694 k EUR at 31 December 2024 and 1,410,200 k EUR at 31 December 2023, an increase of 247,494 k EUR.

The 'Cost onractors for grid construction and maintenance' increases with 177,530k EUR due to the accelerated rollout of digital meters, investments in sewerage, public lighting and energy transition.

Subsidies for rational use of energy (RUE) amount to 295,304 k EUR on 31 December 2024 and 268,910 k EUR on 31 December 2023, an increase of 26,394k EUR. These costs reflect the payment of the premiums for REG requested by individuals and companies. These premiums are

granted to individuals and companies that invest in energy-efficient applications and renewable energy. Since 1 October 2022, a new website has been made available for the energy grants and the renovation premium: [www.Mijnverbouwpremie.be](http://www.Mijnverbouwpremie.be). A number of the former Fluvius energy premiums (insulation premiums, solar water heater, heat pump, heat pump boiler) can be applied for here. In addition, there are also premiums that must be applied for directly via Mijn Fluvius' (solar panels, EPC label premium, electric heat control, asbestos removal, relighting,...). These premiums are laid down in the Energy Decree and are subject to regular changes. The increase is attributable to significantly higher numbers and amounts of various energy premiums applied for through the 'Mijn Verbouw Premie' portal. Conversely, the premiums applied for through 'Mijn Fluvius' experienced a sharp decline (halving) in both numbers and amounts compared to 2023. The primary reason for this is that the solar panel premium could no longer be applied for installations inspected from 1 January 2024.

Additionally, there are primarily increases in 'Costs for direct purchases' by 4,018 k EUR due to the increase in grid-related purchases (2024: 38,060 k EUR; 2023: 33,994 k EUR). This item also includes purchases of non-grid-related materials (2024: 49,072 k EUR; 2023: 49,120 k EUR) such as the purchase of mobile equipment, IT materials, furnishings, and the like.

The item 'Fee for usage various equipment and installations' increases by 11,610 k EUR and mainly concerns the recharged costs of office supplies, warehouses, distribution installations, and various fixed assets that include short-term rental costs.

'Contractual compensations' for support, service fees, maintenance, and IT costs increase by 2,145 k EUR, as well as 'Licensing costs' which increase by 5,927 k EUR for IT-related fees concerning platform management by third parties and licence fees that should be considered as service costs.

Additionally, there is a significant decrease in the item 'Utilities and fuel costs' by 8,363 k EUR due to the sharply decreased energy prices, as well as a slight decrease of 1,673 k EUR in the fees (levies) paid for the 'Use of public domain' in the context of works carried out.

The item 'Other' includes costs for contractual compensations (2024: 3,362 k EUR; 2023: 3,026 k EUR), professional contributions to professional associations (2024: 6,023 k EUR; 2023: 5,600 k EUR), and directors' remunerations (2024: 65 k EUR; 2023: 56 k EUR).

All of these costs have been recharged mainly to the Mission Entrusted Associations.

## 6 Employee benefit expenses

[In duizenden EUR]	2024	2023
Bezoldigingen	440,103	405,690
Sociale zekerheidsbijdragen	106,016	97,453
Lasten voor pensioenregelingen en bovenwettelijke verzekeringen	30,613	19,960
Andere personeelskosten	133,344	133,810
<b>Totaal</b>	<b>710,076</b>	<b>656,913</b>

Employee benefit expenses amount to 710,076 k EUR at 31 December 2024 and 656,913 k EUR at 31 December 2023, an increase of 53,163 k EUR.

The items 'Remunerations' and 'Social security contributions' see an increase of 34,413 k EUR and 8,563 k EUR respectively or an increase of 8%. Salaries evolve on a monthly basis in line with inflation. In 2024, the increase is mainly due to an increase in the number of employees and indexation of 3.5%.

The 'Contributions to defined benefit plans and other insurances' increase with 10,653 k EUR to an amount of 30,613 k EUR. Primarily due to increased costs related to employee obligations, including mainly the premiums for health care coverage.

The Energy Decree stipulates that every MEA can rely on only one operating company. All MEAs, shareholders of the Group, have selected Fluvius System Operator cv to carry out their assignments with its own personnel. Fluvius System Operator can appeal to statutory (permanent) staff via secondment. In order for the secondment to take place via a single company, all statutory staff of the ex-Infrac MEAs and ex-Integan have been transferred to Fluvius OV. This company passes on its costs to Fluvius System Operator cv. The item 'Other personnel costs' includes these personnel costs as well as costs charged through by third parties.

The Group employed on average 5,462 full-time equivalent persons during 2024, compared with 5,167 in 2023. The average number of full-time equivalent employees called on from Fluvius OV was 615 in 2024 and 664 in 2023.

## 7 Depreciation, amortization, impairment and changes in provisions

[In thousands of EUR]	2024	2023
Amortization of intangible assets	43	332
Depreciation of property, plant and equipment and right-of-use assets	10,884	11,246
<b>Total amortization and depreciation</b>	<b>10,927</b>	<b>11,578</b>
Impairment of trade receivables	-3,208	1,017
<b>Total</b>	<b>7,719</b>	<b>12,595</b>

The depreciation contains the depreciations of intangible assets (2024: 43 k EUR; 2023: 332 k EUR), property, plant and equipment (2024: 447 k EUR; 2023: 524 k EUR) and also of the right of use assets (2024: 10,437 k EUR; 2023: 10,722 k EUR).

The impairment losses on trade receivables include both additions and reversals of impairment losses. See notes '19 Trade and other receivables, receivables cash pool activities' and '25 Financial instruments: policy and fair value'.

## 8 Financial results

[In thousands of EUR]	2024	2023
Interest income Mission Entrusted Associations	187,119	153,924
Interest income	895	1,606
Other financial income	6,443	4,591
<b>Total financial income</b>	<b>194,457</b>	<b>160,121</b>
Interest expenses Mission Entrusted Associations	9,894	6,330
Interest expenses banks	25,900	19,705
Interest expenses bond loans	165,904	138,218
Interest expenses, derivative financial instruments	175	804
Other financial expenses	11,581	26,288
<b>Total financial expenses</b>	<b>213,454</b>	<b>191,345</b>

The interest income was principally realized from the interest on the loans to the Mission Entrusted Associations, as well as the interest on the cash pool activities with the Mission Entrusted Associations.

Other financial income mainly comprises financial discounts (62 k EUR in 2024; 183 k EUR in 2023), interest on receivables from Atrias (1,089 k EUR in 2024; 1,465 k EUR in 2023) and Telenet (3,470 k EUR in 2024; 1,861 k EUR in 2023) and interest on the loan to Wyre (1,031 k EUR in 2024; 516 k EUR in 2023).

The interest expenses were the result of the interest on the bond loans, loans with the banks and partly from loans and the cash pool activities with the Mission Entrusted Associations. Interest expenses on bank loans and bonds increased by 33,881 k EUR at the end of 2024 to 191,804 k EUR due to rising interest rates in the financial markets and additional loans taken out and utilised during the year for short-term financing.

The other financial expenses mainly comprise costs for issuing loans (4,950 k EUR in 2024; 4,628 k EUR in 2023), interest on leasing (1,042 k EUR in 2024; 912 k EUR in 2023), interest costs on defined



benefits liabilities [5,311 k EUR in 2024; 6,959 k EUR in 2023] and 13,516 k EUR interests in 2023 as a result of the discounted long-term receivables from Telenet [see note '17 Long- and short-term receivables, other'].

## 9 Income tax expenses

(In thousands of EUR)	2024	2023
Current income tax expenses	-9,229	-8,179
Current income tax expenses on previous year result	53	-737
<b>Total income tax expenses</b>	<b>-9,176</b>	<b>-8,916</b>

Income tax expenses on the result amount to 9,176 k EUR on 31 December 2024 and 8,916 k EUR on 31 December 2023, an increase of 260 k EUR.

The current tax liabilities amount to 3,962 k EUR at the end of 2024 [2023: 3,619 k EUR] and a tax asset at the end of 2023 amount to 20 k EUR.

The statutory Belgian corporate tax rate is 25.00% and is calculated on the taxable base. This includes the result of the financial year as well as costs that, according to taxation, cannot be deducted from the result.

These non-deductible costs thus include rejected expenses mainly related to car expenses [2024: 1,708 k EUR; 2023: 2,495 k EUR] and social and employee benefits [2024: 22,709 k EUR; 2023: 17,356 k EUR].

The Pillar 2 legislation [Act of 19 December 2023 introducing a minimum tax for multinational enterprises and large domestic groups] has been adopted in the jurisdiction where Fluvius System Operator, Atrias, De Stroomlijn, and Synductis ["the Group"] operate. The legislation is effective for the financial year of the Economic Group starting on 1 January 2024, as well as the impact of the amendments to IAS 12, which were introduced in response to the OECD's Pillar 2 model rules. The Group is required to prepare consolidated financial statements from an accounting perspective, whereby Fluvius System Operator, Atrias, De Stroomlijn, and Synductis qualify as 'group entities' under the Pillar 2 legislation. Since only Fluvius System Operator has control or ownership interest in the other three companies, it is considered the 'ultimate parent entity' of the group. The Group's consolidation perimeter exceeds the minimum revenue threshold of 750 million EUR at least twice

in the period 2020-2023, making Fluvius System Operator, Atrias, De Stroomlijn, and Synductis subject to the [Belgian] Pillar 2 legislation as a 'large domestic group'. The Group is currently utilising the 'safe harbour' transitional provisions in Articles 63 and 64 of the Belgian Pillar 2 legislation, resulting in a zero additional tax liability during the transition period. Although these provisions only mention MNE groups, it was confirmed in writing by the Federal Public Service Finance (Corporate Tax/Pillar 2 department) that the 'safe harbour' transitional provisions can also be applied by large domestic groups.

In 2024, the Group complied with all administrative obligations imposed under the [Belgian] Pillar 2 legislation. The Group was registered with the Crossroads Bank for Enterprises, obtaining a Pillar 2 identification number.

Based on the analysis conducted, the members of the Group can currently rely on the transition rules provided in the Pillar two regulations. Therefore, based on its current profile, the Group does not have any additional taxes arising from the Pillar two legislation in 2024. Therefore there is no current tax effect accounted for.

These income tax expenses consist of prepaid taxes and withholding taxes for the financial year [2024 6,733 k EUR; 2023: 6,627 k EUR], the estimated income taxes for 2,496 k EUR [2023: 1,552 k EUR] and a regularisation for the previous financial years for 737 k EUR.

In total, 8,814 k EUR of taxes were paid during 2024 [2023: 8,379 k EUR] relating on the one hand to previous financial years [2024: 2,081 k EUR; 2023: 1,752 k EUR] and on the other hand to prepaid taxes [2024: 6,733 k EUR; 2023: 6,627 k EUR].

# Assets

## 10 Intangible assets

(In thousands of EUR)	Licences and similar rights	Development costs	Total
<b>Acquisition value at 1 January 2024</b>	<b>1,992</b>	<b>5,908</b>	<b>7,900</b>
Disposals	-822	-3,102	-3,924
<b>Acquisition value at 31 December 2024</b>	<b>1,170</b>	<b>2,806</b>	<b>3,976</b>
<b>Amortization and impairment at 1 January 2024</b>	<b>1,896</b>	<b>5,907</b>	<b>7,803</b>
Amortization	42	1	43
Disposals	-822	-3,102	-3,924
<b>Amortization and impairment at 31 December 2024</b>	<b>1,116</b>	<b>2,806</b>	<b>3,922</b>
<b>Net book value at 31 December 2024</b>	<b>54</b>	<b>0</b>	<b>54</b>
(In thousands of EUR)	Licences and similar rights	Development costs	Total
<b>Acquisition value at 1 January 2023</b>	<b>1,992</b>	<b>5,908</b>	<b>7,900</b>
<b>Acquisition value at 31 December 2023</b>	<b>1,992</b>	<b>5,908</b>	<b>7,900</b>
<b>Amortization and impairment at 1 January 2023</b>	<b>1,849</b>	<b>5,622</b>	<b>7,471</b>
Amortization	47	285	332
<b>Amortization and impairment at 31 December 2023</b>	<b>1,896</b>	<b>5,907</b>	<b>7,803</b>
<b>Net book value at 31 December 2023</b>	<b>96</b>	<b>1</b>	<b>97</b>

## 11 Property, plant and equipment

(In thousands of EUR)	Installation, machinery and equipment	Furniture and vehicles	Others	Total
<b>Acquisition value at 1 January 2024</b>	<b>218</b>	<b>94,620</b>	<b>2,087</b>	<b>96,925</b>
Acquisitions	0	373	122	495
Disposals	0	-1	-1	-2
<b>Acquisition value at 31 December 2024</b>	<b>218</b>	<b>94,992</b>	<b>2,208</b>	<b>97,418</b>
<b>Depreciation and impairment at 1 January 2024</b>	<b>150</b>	<b>93,809</b>	<b>1,437</b>	<b>95,396</b>
Depreciation	15	253	179	447
Disposals	0	-1	0	-1
<b>Depreciation and impairment at 31 December 2024</b>	<b>165</b>	<b>94,061</b>	<b>1,616</b>	<b>95,842</b>
<b>Net book value at 31 December 2024</b>	<b>53</b>	<b>931</b>	<b>592</b>	<b>1,576</b>

Assets

(In thousands of EUR)	Installation, machinery and equipment	Furniture and vehicles	Others	Total
<b>Acquisition value at 1 January 2023</b>	<b>198</b>	<b>94,994</b>	<b>2,849</b>	<b>98,041</b>
Acquisitions	20	197	259	476
Sales	0	-46	0	-46
Disposals	0	-525	-1,021	-1,546
<b>Acquisition value at 31 December 2023</b>	<b>218</b>	<b>94,620</b>	<b>2,087</b>	<b>96,925</b>
<b>Depreciation and impairment at 1 January 2023</b>	<b>134</b>	<b>93,894</b>	<b>2,085</b>	<b>96,113</b>
Depreciation	16	324	184	524
Sales	0	-46	0	-46
Disposals	0	-363	-832	-1,195
<b>Depreciation and impairment at 31 December 2023</b>	<b>150</b>	<b>93,809</b>	<b>1,437</b>	<b>95,396</b>
<b>Net book value at 31 December 2023</b>	<b>68</b>	<b>811</b>	<b>650</b>	<b>1,529</b>

During the years 2024 and 2023, no impairment had to be taken.

As of 31 December 2024 and 2023, there were no limitations on ownership of property, plant and equipment which serve as guarantee for obligations.

There were no commitments for the acquisition of property, plant and equipment at the end of 2024 and 2023.

## 12 Right-of-use assets and lease liabilities

(In thousands of EUR)	Land and buildings	Installation, machinery and equipment	Furniture and vehicles	Total
<b>Acquisition value at 1 January 2024</b>	<b>23,472</b>	<b>1,327</b>	<b>40,162</b>	<b>64,961</b>
Acquisitions	1,394	1	14,994	16,389
Disposals	-243	-218	-7,943	-8,404
Other	-3,868	-64	-428	-4,360
<b>Acquisition value at 31 December 2024</b>	<b>20,755</b>	<b>1,046</b>	<b>46,785</b>	<b>68,586</b>
<b>Depreciation and impairment at 1 January 2024</b>	<b>7,273</b>	<b>697</b>	<b>22,252</b>	<b>30,222</b>
Depreciation	2,031	245	8,161	10,437
Sales and disposals	-243	-158	-7,142	-7,543
<b>Depreciation and impairment at 31 December 2024</b>	<b>9,061</b>	<b>784</b>	<b>23,271</b>	<b>33,116</b>
<b>Net book value at 31 December 2024</b>	<b>11,694</b>	<b>262</b>	<b>23,514</b>	<b>35,470</b>

The **other** category pertains to the lease agreement for the 7th floor of the Zenith building in Brussels, which was subleased to Atrias under the same conditions. As a result of the sublease, the right-of-use asset was derecognised for a net book value of 1,956 k EUR, against a lease receivable of 2,004 k EUR as of 30 June 2024. This item also includes adjustments to the term and granted discounts of existing contracts.

Assets

(In thousands of EUR)	Land and buildings	Installation, machinery and equipment	Furniture and vehicles	Total
<b>Acquisition value at 1 January 2023</b>	<b>20,366</b>	<b>1,503</b>	<b>36,393</b>	<b>58,262</b>
Acquisitions	9,729	651	11,157	21,537
Disposals	-6,623	-827	-7,300	-14,750
Other	0	0	-88	-88
<b>Acquisition value at 31 December 2023</b>	<b>23,472</b>	<b>1,327</b>	<b>40,162</b>	<b>64,961</b>
<b>Depreciation and impairment at 1 January 2023</b>	<b>10,873</b>	<b>1,214</b>	<b>21,401</b>	<b>33,488</b>
Depreciation	3,023	280	7,419	10,722
Sales and disposals	-6,623	-797	-6,568	-13,988
<b>Depreciation and impairment at 31 December 2023</b>	<b>7,273</b>	<b>697</b>	<b>22,252</b>	<b>30,222</b>
<b>Net book value at 31 December 2023</b>	<b>16,199</b>	<b>630</b>	<b>17,910</b>	<b>34,739</b>

## Lease commitments and the movements during 2024 and 2023

[In thousands EUR]	2024	2023
<b>Lease liabilities at 1 January</b>	<b>35,662</b>	<b>25,739</b>
Additions	13,141	20,686
Accretion of interest	1,042	913
Payments	-11,455	-11,676
<b>Lease liabilities at 31 December</b>	<b>38,390</b>	<b>35,662</b>
Non-current lease liabilities	27,945	26,498
Current lease liabilities	10,445	9,164

The lease liabilities as at 31 December 2024 related to land and buildings amounted to 14,045 k EUR (2023: 16,539 k EUR, installations, machinery and equipment for 268 k EUR (2023: 638 k EUR) and furniture and vehicles for 24,077 k EUR (2023: 18,485 k EUR).

As part of the decarbonisation levers, a gradual phasing out of fossil-fuel cars. For leased vehicles full electrification is foreseen by 2030 at the latest, for the service vehicles the electrification depends on the availability of these types of vehicles.

No lease agreements were entered into that have not yet started as of 2024.

The following discount rates have been used to determine the lease liability:

- For Land and buildings: 2.00% and 3.08%
- For Installation, machinery and equipment: 2.00%
- For Furniture and vehicles: between 3.00% and 7.00 %

## 13 Investments in associates and joint ventures

Investments in joint ventures and associates amount to 922,076 k EUR at the end of 2024 and 934,617 k EUR at the end of 2023. They are held in Wyre Holding bv, Atrias cv and Synductis cv.

### Atrias cv

On 9 May 2011, Atrias cv was established as a joint initiative of Belgium's largest energy distribution operators Fluvius, Ores, Sibelga and RESA.

Atrias is a central clearing house for the Distribution System Operators and is charged with the development of a Message Implementation Guide (MIG), the development of a clearing house application, and the management and maintenance of this application. MIG describes how the communication flow between the various players of the energy market should happen.

Fluvius System Operator participates for an amount of 9 k EUR and the share percentage amounts to 50% at the end of 2024 and at the end of 2023.

Atrias is an unlisted company and has no official price quotation.

The Group receives its share of the operating costs of Atrias. But the Group also grants services and funding (see note '26 Related parties').

### Synductis cv

Synductis cv was founded on 21 December 2012 and aims to coordinate the infrastructure works by various utility companies in the Flemish cities and municipalities and so reduce nuisance caused by the works.

Fluvius System Operator participates for an amount of 8 k EUR and the share percentage amounts to 34.38% at the end of 2023 and at the end of 2022.

Synductis is an unlisted company and has no official price quotation.

The Group receives its share of the operating costs of Synductis. But the Group also grants services and funding (see note '26 Related parties').

## Wyre holding bv

On 1 July 2023, the Wyre transaction between Fluvius and Telenet, concerning the partnership around the 'data network of the future' in Flanders, was completed. Wyre bv is an independent self-financing infrastructure company, in which the fixed data network assets of Fluvius and Telenet have been brought together. Wyre bv's goal is to implement a hybrid network strategy to offer speeds of up to 10 Gbps to all its customers and ensure they enjoy the best possible network experience. The fiber optic network is expected to cover up to 78% of all homes in Flanders and parts of Brussels. Wyre will operate a network with fully open access and without discriminatory conditions and provide wholesale access to other interested telecom operators, including Telenet and Orange.

This carve-out took place by means of a number of legal steps which entered into force simultaneously, but with a legal chronology.

Initially, the commissioning associations contributed their HFC networks, leasehold rights and other assets related to cable infrastructure activities (including the participation in Interkabel Vlaanderen cv) to Fluvius System Operator. This contribution was remunerated on the basis of IFRS 2 'Sharebased payments' at fair value and recognised as an issue of equity (see note '21 Equity'). The remuneration to the public transport companies is based on the share of 1,010,000 k EUR acquired by Fluvius in the equity of Wyre Holding bv, less Fluvius SO's own contribution to Wyre, i.e. the stock of trade goods for 13,668 k EUR.

Immediately following this contribution, a silent merger took place between Fluvius System Operator cv and Interkabel Vlaanderen cv (see note '21 Equity' as a result of the movement in equity amounting to 26,776 k EUR).

Subsequently, Fluvius contributed the stock, assets, leasehold rights related to cable infrastructure activities as well as a loan of 32,000 k EUR (see note '17 Long- and short-term receivables, other') to Wyre bv, for which a transfer of shares of 35.3% of the total number of shares, with a value of 1,010,000 k EUR, took place. Fluvius itself has taken out a long-term loan of 32,000 k EUR from two affiliated companies (see note '22 Interest bearing loans and borrowings'). Immediately after this contribution, Fluvius sold 2.1% of its shares in Wyre bv to Telenet for 120,000 k EUR in the context of a 'synthetic dividend', which reflects a deferred payment over 6 years (see notes '21 Equity' and '17 Long- and short-term receivables, other'). As a result of this sale, the Group realised a gain on the sale of fixed assets of 59,915 k EUR.

The final accounting treatment of the business combination has been completed within the applicable 12 month period. The impact on the reported financial statements as of 31 December 2023 for the Group's share amounts to -25,493 k EUR, mainly due to adjustments to the fair value of network assets, licences, customer contracts, and loans, which also affected the calculation of

deferred taxes. The Group's participation in Wyre Holding bv amounts to 922,059 k EUR at the end of 2024 and 934,600 k EUR at the end of 2023, with a shareholding percentage of 33.2%.

The Group's interest in Wyre Holding bv is accounted for using the equity method in the consolidated financial statements.

The included table presents a summary of the financial information including the redetermined figures for the financial year 2023, and provides a breakdown of the carrying amount of the investment in the consolidated financial statements.

Based on the shareholders' agreement between Fluvius and Telenet, Fluvius' approval is required for any changes to the dividend policy of Wyre Holding bv. The Group does not foresee any distribution as of the reporting date. Wyre Holding bv has no significant contingent liabilities as of 31 December 2024.

In view of the operational migration to Wyre bv, the Group has provided transition services to Wyre from 1 July 2023 (See note '26 Related parties'). In 2024, these transition services related to:

- HFC works that was carried out over a period of up to one year, according to a migration schedule per operating area. All operating areas were transferred in the first half of 2024 and by the end of June, Fluvius stopped performing HFC;
- IT migration of the data associated with the telecom activities contributed to Wyre was completed in May 2024;
- Electronic communication services offered under the name 'FluviusNet' are still going to be carried out by the Group until 1 October 2025.



Assets

(In thousands of EUR)	31 December 2024	31 December 2023 (restated)	31 December 2023 (as reported)
Current assets	536,362	276,021	276,021
Non-current assets	5,681,705	5,816,921	5,667,101
Current liabilities	385,565	194,856	210,474
Non-current liabilities	3,054,713	3,082,470	2,840,246
<b>EQUITY</b>	<b>2,777,789</b>	<b>2,815,616</b>	<b>2,892,402</b>
<i>of which non-controlling interests</i>	<i>503</i>	<i>557</i>	<i>557</i>
<i>of which equity attributable to owners of the parent</i>	<i>2,777,286</i>	<i>2,815,059</i>	<i>2,891,845</i>
<b>Group's share in equity - 33.2%</b>	<b>922,059</b>	<b>934,600</b>	<b>960,093</b>
Operating revenue	683,464	346,251	346,776
Operating expenses	-591,209	-314,881	-243,549
Finance income	13,547	2,289	2,289
Finance costs	-145,266	-91,332	-60,806
<b>Profit before tax</b>	<b>-39,464</b>	<b>-57,673</b>	<b>44,710</b>
Income tax expenses	2,272	12,131	-13,465
<b>Profit for the period</b>	<b>-37,192</b>	<b>-45,542</b>	<b>31,245</b>
Net other comprehensive income not being reclassified to profit or loss in subsequent periods	-635	-628	-628
<b>Total comprehensive income for the period</b>	<b>-37,827</b>	<b>-46,170</b>	<b>30,617</b>
<i>of which attributable to non-controlling interests</i>	<i>-54</i>	<i>-37</i>	<i>-37</i>
<i>of which attributable to owners of the parent</i>	<i>-37,773</i>	<i>-46,133</i>	<i>30,654</i>
<b>Group's share of profit for the year - 33.2%</b>	<b>-12,541</b>	<b>-15,315</b>	<b>10,178</b>

## 14 Other investments

Other investments amount to 912 k EUR at 31 December 2024 (889 k EUR at December 2023).

The other investments comprise the participations held by the Group in the business centres situated in the distribution area of Gaselwest (business centres Kortrijk, Flemish Ardennes and Waregem) and Imewo (business centres Bruges and Ghent).

Also, the Group has a participation in the company Duwolim cv, which aims to reduce energy consumption at home.

## 15 Rights to reimbursement on post-employment employee benefits

The costs related to the employee benefit liabilities are recoverable from the Mission Entrusted Associations. Rights to reimbursement on post-employment employee benefits amount to 121,079 k EUR at 31 December 2024 and 153,342 k EUR at 31 December 2023 (see note '23 Employee benefit liabilities').

## 16 Derivative financial assets

The Group has entered into an interest rate swap in order to convert the variable interest rate on long-term loans into a fixed interest rate.

The derivative financial instruments were recognised as liabilities and amounting to 276 k EUR as of 31 December 2024 and 101 k EUR as of 31 December 2023.

The changes in the fair value are recognized in the income statement (see note '8 Financial results').

The fair value of derivative financial instruments entered into for hedging the interest rate risk is calculated on the basis of the discounted expected future cash flows taking into account current market interest rates and the yield curve for the instrument's remaining maturity.

Overview of the derivative financial instruments as per 31 December 2024 and 31 December 2023:

- An interest rate swap within the framework of the original 70,000 k EUR loan with a maturity of 20 years concluded in September 2011 entered into force in September 2011.

## 17 Long- and short-term receivables, other

[In thousands of EUR]	31 December 2024	31 December 2023
Receivable from MEA following lending-on funds from issuance bonds with private investors (retail)	200,000	0
Receivable from MEA following lending-on funds from bank loan with fixed interest rate	15,231	0
Receivable from Telenet following the sale of 2.1% shares in Wyre bv	18,396	18,107
Lease receivable	252	0
<b>Total short-term receivables</b>	<b>233,879</b>	<b>18,107</b>
Receivable from MEA following lending-on funds from issuance bonds with private investors (retail)	240,000	440,000
Receivable from MEA following lending-on funds from issuance bonds with European institutional investors (EMTN program) <sup>1</sup>	5,810,500	5,110,500
Receivable from MEA following lending-on funds from issuance bonds with institutional investors (stand alone)	440,000	440,000
Receivable from MEA following lending-on funds from bank loan with fixed interest rate)	732,769	550,000
Receivable from Wyre bv following providing a loan	32,000	32,000
Receivable from Telenet following the sale of 2.1% shares in Wyre bv	73,418	90,237
Lease receivable	1,721	0
Other	33,420	47,252
<b>Total long-term receivables</b>	<b>7,363,828</b>	<b>6,709,989</b>

<sup>1</sup> Euro Medium Term Note (EMTN) program – see note 'Financial Instruments'

The item 'Short-term and long-term receivables' mainly includes receivables from the MEAs arising from the on-lending of funds raised through the issuance of bonds by the operating company since 2012.

The terms of the long-term loans to the Mission Entrusted Associations were identical to those of the respective bond loans [see note '122 Interest bearing loans and borrowings'].

The long-term receivables from the MEAs increase with 898,000 k EUR. In 2024 a new bond loan of 700,000 k EUR and a bankloan were on-lent to the MEAs, increasing the receivables. In 2025, 215,231 k EUR will mature.

The receivable as a result of the contribution of the cable activities and assets to Wyre bv amounts to 32,000 k EUR, collectible on 1 July 2028.

The receivable from Telenet, arising from the sale of 2.1% of Fluvius' share in Wyre bv, amounts to 91,814 k EUR. This receivable is repaid in annual instalments of 20,000 k EUR over a period of 6 years, with the final payment due on 30 June 2029.

Furthermore, the item 'Other' of the long-term receivables includes previously charged financing to Atrias cv [see note '26 Related parties'], as well as receivables arising from recharged revenues and costs to the MEAs and guarantees.

## 18 Inventories

[In thousands of EUR]	2024	2023
Raw materials and consumables	232,909	200,127
Accumulated impairment on inventories	-9,679	-9,652
<b>Total</b>	<b>223,230</b>	<b>190,475</b>

The increase in inventory can mainly be attributed to electricity and gas. The network transition, particularly cables and transformers, is the primary source of this increase. More inventory is being purchased to meet future demand. For gas, it mainly concerns replacement investments.

The net addition on impairment losses amounted to 27 k EUR in 2024 [2023: 2,025 k EUR net write-back]. These amounts were recognised in the income statement under 'purchases of consumables' [see note '4 Cost of trade goods'].

## 19 Trade and other receivables, receivables cash pool activities

[In thousands of EUR]	2024	2023
Trade receivables - gross	107,306	322,555
Impairments on trade receivables	-38,463	-41,671
<b>Trade receivables - net</b>	<b>68,843</b>	<b>280,884</b>
<b>Other receivables</b>	<b>140,542</b>	<b>135,860</b>
<b>Total trade and other receivables</b>	<b>209,385</b>	<b>416,744</b>
<b>Receivables cash pool activities</b>	<b>136,888</b>	<b>256,740</b>

The '**gross trade receivables**' amount to 107,306 k EUR at the end of 2024 and 322,555 k EUR at the end of 2023, a decrease of 215,249 k EUR.

The trade receivables mainly consist of receivables with the Mission Entrusted Associations and energy suppliers. These trade receivables amounted to 2,556 k EUR at the end of 2024 and 212,477 k EUR at the end of 2023. The receivables from the MEAs are the result of passing on the costs of the operating company to the MEAs for which no settlement had yet taken place. The decrease of 209,921 k EUR is related to the immediate settlement of the cost recharges to the MEAs for December, due to the preparations for the structural changes taking place as of 1 January 2025 [see notes 'Shareholder structure [see page 18]' and 'Changes in the operating area and structure of the Fluvius Economic Group [see page 19]'].

Besides, receivables are recorded relating to an external customer group. These receivables arise from the invoicing for work carried out (connections, installation of electricity and gas pipelines), damage claims, fraud cases, invoicing for Energy Services to Local Authorities and Energy Service Companies (ESLA/ESCO)<sup>1</sup>, invoicing for public lighting and invoicing to Ministries. These receivables remain at the same level as last year. Impairments have decreased by 3,208 k EUR [2024: 38,463 k EUR; 2023: 41,671 k EUR]. [See note '7 Depreciation, amortization, impairment and changes in provisions' and '25 Financial instruments: policy and fair value']

The '**Other receivables**' amount to 140,542 k EUR at the end of 2024 and 135,860 k EUR at the end of 2023. These receivables mainly include the amount of VAT of 17,111 k EUR at the end of

<sup>1</sup> Energy services will be abolished as of 1 January 2025, with a transitional measure allowing these activities to continue until 31 December 2027 at the latest, provided that these activities have already started by 31 December 2024 at the latest.

2024 (2023: 3,666 k EUR). The accrued interest to be received from the MEAs in relation to the on-lending of the bonds for an amount of 103,102 k EUR at the end of 2024 (2023: 68,477 k EUR),, a claim on 'Wonen in Vlaanderen' in the context of 'mijn verbouwpremies', premiums paid out for 3,431 k EUR at the end of 2024 (2023: 41,552 k EUR). And deferred costs for 8,944 k EUR at the end of 2024 (2023: 14,361 k EUR), mainly relating to cost of trade goods, cost for services and other consumables and interest payable.

The item '**Receivables cash pool activities**' comprises the positive balances on the accounts of the Mission Entrusted Associations related to the cash pool and should be evaluated together with the item 'Liabilities cash pool activities' where the negative balances are included.

The information regarding outstanding balances with the associate was included in note '[26 Related parties](#)'.

Payment terms The payment terms for private and professional customers are 30 days, for municipalities 60 days and Ministries 90 days.

## 20 Cash and cash equivalents

Cash and cash equivalents amounting to 1,084 k EUR as of 31 December 2024 (2023: 61,605 k EUR) include bank deposits, cash resources and fund investments that are readily exchangeable into cash.

In 2023, as a result of loans taken out during the year, 'surpluses' of funds were temporarily held as cash.

All resources are reported in EUR.

# Liabilities

## 21 Equity

The separate components of shareholders' equity and the movements therein from 1 January 2023 until 31 December 2024 are included in the ' [Consolidated statement of changes in equity](#) '.

**Contributions excluding capital** amounts to 497,894 k EUR at 31 December 2024 and at 31 December 2022. This capital is represented by A and K shares without nominal value. These A and K shares carry voting rights and are entitled to dividends. For K shares, the voting rights only apply to matters relating to the management of the participation in Wyre Holding bv. Within the K shares, there are 'non-K-syn' shares and 'K-syn' shares; the shares in K-syn entitle them to a 'synthetic dividend'. Synthetic dividend is understood to mean the cash resources accruing to the ex-cable companies (Fluvius Antwerp, Fluvius Limburg, Fluvius West and PBE) in connection with the continuity of their dividend flow during at least the first 6 years of the operational existence of Wyre bv. The contribution outside capital, other was fully issued and paid.

The A-shares are based on the general organization of Fluvius System Operator as the operating company of the affiliated MEAs and are distributed based on the number of (multi-utility) EANs/ connection points in Flanders and according to the number of EANs/connection points per shareholder on its territory.

The contribution made by MEAs for the Wyre transaction in 2023 was remunerated through the issue of equity (1,023,108 k EUR) [see note '13 [Investments in associates and joint ventures](#)'], split into 'Contributions excluding capital' for 496,483 k EUR (1,010,000 K shares) and 526,625 k EUR 'Available reserves'.

For the new issuance of the 1.010.000 K shares in 2023, the Board of Directors of Fluvius SO applied the following principles for the distribution among the MEAs based on their respective contributions:

- Allocation of 830,000 K-syn shares to the 4 MEAs Fluvius Antwerp, Fluvius Limburg, Fluvius West and PBE as compensation for their contribution of the bare ownership of the HFC networks and the leasehold rights.
- Allocation of 180,000 non-K-syn shares to compensate for their contribution of the other assets related to the cable infrastructure activities.

The shares are nominative in the name of the Flemish Mission Entrusted Associations.

## Breakdown of the Contribution excluding capital, other per MEA

Mission entrusted associations	Amount	Amount	Amount	Amount
	in euro of voting A and K shares	in euro of voting A and K shares	in euro of voting A and K shares	in euro of voting A and K shares
	31 December 2024	31 December 2024	31 December 2023	31 December 2023
Gaselwest	12,004,580	2,711,673	12,004,580	2,711,673
Fluvius Antwerpen	118,116,656	4,927,882	118,116,656	4,927,882
Fluvius Limburg	187,166,554	5,046,808	187,166,554	5,046,808
Imewo	15,468,592	3,798,172	15,468,592	3,798,172
Fluvius West	108,768,071	1,578,274	108,768,071	1,578,274
Intergem	6,506,704	1,853,953	6,506,704	1,853,953
Iveka	5,047,582	1,580,224	5,047,582	1,580,224
Iverlek	11,040,425	3,508,983	11,040,425	3,508,983
PBE	32,409,196	1,011,018	32,409,196	1,011,018
Riobra	19,551	394,394	19,551	394,394
Sibelgas	1,219,153	499,554	1,219,153	499,554
<b>Total</b>	<b>497,767,064</b>	<b>26,910,935</b>	<b>497,767,064</b>	<b>26,910,935</b>

Liabilities

**Breakdown of the A and K-shares as per 31 December 2024 and 31 December 2023**

Mission entrusted associations	Amount in euro of voting A shares	Amount of voting A shares	Amount in euro of voting K shares	Amount of voting K shares
Gaselwest	133,227	2,687,523	11,871,353	24,150
Fluvius Antwerpen	232,400	4,688,069	117,884,256	239,813
Fluvius Limburg	231,332	4,666,524	186,935,222	380,284
Imewo	186,744	3,767,084	15,281,848	31,088
Infrac West*	67,277	1,357,143	108,700,794	221,131
Intergem	91,258	1,840,902	6,415,446	13,051
Iveka	77,835	1,570,114	4,969,747	10,110
Iverlek	172,853	3,486,875	10,867,572	22,108
PBE	46,855	945,183	32,362,341	65,835
Riobra	19,551	394,394	0	0
Sibelgas	24,644	497,124	1,194,509	2,430
<b>Total</b>	<b>1,283,976</b>	<b>25,900,935</b>	<b>496,483,088</b>	<b>1,010,000</b>

**Breakdown of the K-shares as per 31 December 2024 and 31 December 2023**

Mission entrusted associations	Amount in euro of voting non-K-syn shares	Amount of voting non-K-syn shares	Amount in euro of voting K- syn shares	Amount of voting K- syn shares
Gaselwest	17,421,876	24,150	0	0
Fluvius Antwerpen	17,164,335	23,793	95,421,134	216,020
Fluvius Limburg	21,233,768	29,434	154,978,729	350,850
Imewo	22,426,968	31,088	0	0
Infrac West*	13,058,111	18,101	89,683,145	203,030
Intergem	9,415,027	13,051	0	0
Iveka	7,293,382	10,110	0	0
Iverlek	15,948,772	22,108	0	0
PBE	4,137,245	5,735	26,547,589	60,100
Sibelgas	1,753,009	2,430	0	0
<b>Total</b>	<b>129,852,493</b>	<b>180,000</b>	<b>366,630,597</b>	<b>830,000</b>

The **available contribution, issuance premium** remains unchanged and amount to 127 k EUR at 31 December 2024 and 31 December 2023.

The Group's **results** are in all cases without profits or losses, since all operational costs can be billed through to mainly the Mission Entrusted Associations, with the exception of the participation in Wyre Holding bv for the public electronic communications networks activities.

The **reserves** amount to 466,434 k EUR at the end of 31 December 2024 and 478,975 k EUR at the end of 31 December 2023 (restated). This decrease is due to the share in the result of Wyre -12,541 k EUR (see note '13 Investments in associates and joint ventures').

**Retained earnings** amount to 20 k EUR as of 31 December 2024, unchanged from 31 December 2023.

**Non-controlling interest** amounts to 100 k EUR at 31 December 2024, unchanged from 31 December 2023.

The non-controlling interest comprises the participation held by Farys in De Stroomlijn cv (92 k EUR) and the participation of De Watergroep in De Stroomlijn cv (8 k EUR).

### Dividend

In accordance with the articles of association, the profit (according to Belgian accounting principles) from the public electronic communication activities is distributed to each participant in proportion based on their ownership stake in K shares. An exception to this is the allocation of the result in the context of the 'synthetic dividend', which is exclusively attributed to the former cable companies Fluvius Antwerp, Fluvius Limburg, Fluvius West, and PBE.

In 2023, an interim dividend of 90,746 k EUR was approved for the K-Syn shares.

## 22 Interest bearing loans and borrowings

[In thousands of EUR]	2024	2023
<b>Long-term loans</b>	<b>7,244,636</b>	<b>6,564,501</b>
Current portion of long-term loans	218,715	3,500
Short-term loans	58,027	525,000
<b>Short-term loans</b>	<b>276,742</b>	<b>528,500</b>
<b>Total</b>	<b>7,521,378</b>	<b>7,093,001</b>

Long and short-term loans amount to 7,521,378 k EUR at 31 December 2024 and 7,093,001 k EUR at 31 December 2023, an increase of 428,433 k EUR.

This increase is primarily due to new long-term financing for a total nominal value of 898,000 k EUR, the repayment of long-term financing for 3,500 k EUR, the borrowing of short-term financing for 58,027 k EUR and the repayment of short-term financing for 525,000 k EUR. The cash and cash equivalents that had not yet been allocated at 31 December were held provisionally as cash.

**The movements of the long- and short-term loans can be analysed as follows:**

(In thousands of EUR)	2024		2023	
	Cash	Non-cash	Cash	Non-cash
<b>Total as at 1 January</b>	<b>7,093,001</b>		<b>6,158,277</b>	
<b>Movements on non-current loans (LT)</b>				
Proceeds of non-current loans	894,131	0	1,459,225	0
Change in non-current loans	0	4,702	0	3,535
Transfer of short-term portion of LT loan to ST	0	-218,698	0	-3,500
<b>Movements on current loans (ST)</b>				
Proceeds of current loans	58,027	0	525,000	0
Transfer of short-term portion from LT loan to ST	0	218,698	0	3,500
Change in current loans	0	17	0	464
Repayment of short-term portion of long-term loan	-3,500	0	-753,500	0
Repayment current loans	-525,000	0	-300,000	0
<b>Total movements</b>	<b>423,658</b>	<b>4,719</b>	<b>930,725</b>	<b>3,999</b>
<b>Total at end of reporting period</b>	<b>7,521,378</b>		<b>7,093,001</b>	

The description 'Change in non-current and current loans' includes the recognition/derecognition of the premium/discount of various loans.

**Long-term loans**

This item **contains** the debts relating to the issue of private placements, bond loans since 2012 and the borrowing of bank loans.

**The following additional loans were taken during 2023 and 2024**

(In thousands of EUR)	2024	2023	Initial amount	Interest rate %	Maturity
Bankloans - Fixed interest rate - January 2024	197,781		198,000	3.12	2037
EMTN - mei 2024 <sup>1</sup>	696,610		700,000	3.88	2034
<b>Total 31 December 2024</b>	<b>894,391</b>		<b>898,000</b>		
Bond issue - EMTN - May 2023 <sup>2</sup>	695,476	694,933	700,000	3.88	2033
Bond issue - EMTN Retail (Green) - June 2023 <sup>2</sup>	239,905	239,866	240,000	4.00	2027
Bond issue - EMTN - September 2023 <sup>2</sup>	494,035	493,073	500,000	3.88	2031
Loan related parties	32,000	32,000	32,000	3.17	2028
<b>Total 31 December 2023</b>	<b>1,461,416</b>	<b>1,459,872</b>	<b>1,472,000</b>		

1 EMTN = Euro Medium Term Note-program - During 2024 there was a raise of a nominal amount of 700.000 k EUR long term financing

2 EMTN = Euro Medium Term Note-program - During 2023 there was a raise of a nominal amount of 1.472.000 k EUR long term financing

One institutional bond loan was issued under the EMTN programme of Fluvius. This for an amount of 700,000 k EUR. Furthermore, a loan of 198,000 k EUR was disbursed by the European Investmentbank (EIB). These funds were used to refinance short term financing of in total 525,000 k EUR that came to maturity in 2024 and to enable new investments. The green EIB term loan was imbedded specifically to finance the rollout of the digital meter chain.

For all bond loans, the principle applies that each of the MEAs is guarantor on a several but non-joint basis, limited to its proportional share in the contribution of its former working company (ex-



Eandis or ex-Infrax). The portion in the contribution was set fixed at the moment of issuance and remains fixed over the remaining term of the bond loans. As a result of the merger (ex-Eandis and ex-Infrax to Fluvius System Operator) dated 1 July 2018 the acquired EMTN bond loans registered on the name of Infrax cv only have the MEAs of ex-Infrax as guarantor. Similarly, for the bonds issued by Eandis System Operator cv, only the MEAs that belonged to the former Economic Group Eandis act as guarantors.

For the issues under the 2020 EMTN-programme, the principle is that all MEAs belonging to the 'Fluvius Economic Group' will each act as guarantor on a non-committed and non-solidary basis but limited to the proportional share in the 'contribution excluding capital' of the operating company.

The loan drawn from the EIB is guaranteed by the ten individual MEAs, shareholders of Fluvius System Operator with electricity activities each in proportion to the share held by the relevant MEA in the total contribution, but adjusted for the exclusion of Riobra which has no electricity activities. The EIB loans were not on-lent to Riobra.

**At the end of 2024 the composition of the loans on long-term was as follows:**

[In thousands of EUR]	2024	Initial amount	Current interest rate %	Maturity
Bond issue - retail	439,889	440,000	2.00 - 4.00	2025 - 2027
Bond issue - EMTN <sup>1</sup>	5,783,390	5,810,500	0.25 - 4.78	2026 - 2044
Bond issue - private <sup>2</sup>	436,948	440,000	2.60 - 3.55	2027 - 2044
Bank loans - with derivative instrument	23,625	70,000	3.31 - 3.31	2031 - 2031
Bank loans - with fixed interest rate	747,499	748,000	0.14 - 3.25	2027 - 2028
Loan related parties	32,000	32,000	3.17 - 3.17	2028 - 2028
<b>Total</b>	<b>7,463,351</b>	<b>7,540,500</b>		
Current portion of long-term debt	-218,715	0		
<b>Total long-term loans</b>	<b>7,244,636</b>	<b>7,540,500</b>		

1 EMTN: Euro Medium Term Note - is a program that provides the Group flexibility to issue bonds with varying durations  
 2 Private: concerns issues of bonds according to German law: Schuldschein and Namensschuldverschreibung, and also private placements to institutional investors (stand alone format)

**At the end of 2023 the composition of the loans on long-term was as follows:**

(In thousands of EUR)	2024	Initial amount	Current interest rate %	Maturity
Bond issue - retail	439,817	440,000	2.00 - 4.00	2025 - 2027
Bond issue - EMTN <sup>1</sup>	5,082,730	5,860,500	0.25 - 4.78	2026 - 2044
Bond issue - private <sup>2</sup>	436,710	440,000	2.60 - 3.55	2027 - 2044
Bank loans - with derivative instrument	27,125	70,000	3.31 - 3.31	2031 - 2031
Bank loans - with fixed interest rate	549,619	550,000	0.14 - 3.25	2027 - 2028
Loan related parties	32,000	32,000	3.17 - 3.17	2028 - 2028
<b>Total</b>	<b>6,568,001</b>	<b>7,392,500</b>		
Current portion of long-term debt	-3,500			
<b>Total long-term loans</b>	<b>6,564,501</b>	<b>7,392,500</b>		

<sup>1</sup> EMTN: Euro Medium Term Note - is a program that provides the Group flexibility to issue bonds with varying durations  
<sup>2</sup> Private: concerns issues of bonds according to German law: Schuldschein and Namensschuldverschreibung, and also private placements to institutional investors (stand alone format)

The return at issuance reflects the gross actuarial return.

The bonds are **listed** on the regulated market of the Luxembourg Stock Exchange and the issues have been listed on the Euronext Brussel, Euronext Growth Brussels and the Freiverkehr of Frankfurt markets since November 2012.

All outstanding loans are expressed in EUR and have a fixed interest rate.

All amounts of the bond loans were **on-lent to the MEAs** under the same conditions as the issued bond loans. The resulting receivables for the Group are included in the item 'Long-term receivables, other'.

One bank loan (with derivative structure) was not on-lent and the EIB loans are not on-lent to Riobra.

The capital of the debenture and the green loans is repayable at maturity.

The bank loan (with derivative structure) has monthly maturities, whereby the variable interest rate was converted into a fixed interest rate via an **Interest Rate Swap**. This derivative was included in a separate item on the balance sheet and expressed at fair value amounting to a liability of 275 k EUR at 31 December 2024 and an asset of 101k EUR at 31 December 2023.

**Loans on short-term**

The loans on short-term **contain** the portion of the long-term loans which are repayable within one year (18,731 k EUR of bank loans and 199,984 k EUR of a retail bond loans at the end of 2024; 3,500 k EUR of a bank loan at the end of 2023) and the loans drawn with financial institutions (58,082 k EUR at 31 December 2024 and 525,000 k EUR at 31 December 2023).

## The Group has the following credit facilities

(In thousands of EUR)	Maturity	Available amounts	Amounts used	Amounts not used	Average interest rate <sup>1</sup>
Commercial paper	NA	500,000	0	500,000	NA
Fixed advances	NA	300,000	0	300,000	NA
Fixed loans/Bank overdraft	Daily	200,000	58,082	141,918	3.39%
Fixed loans	NA	25,000	0	25,000	NA
<b>Total at 31 December 2024</b>		<b>1,025,000</b>	<b>58,082</b>	<b>966,918</b>	
Commercial paper	<sup>2</sup>	500,000	425,000	75,000	4.16%
Fixed advances	<sup>3</sup>	300,000	100,000	200,000	4.20%
Fixed loans/Bank overdraft	Daily	200,000	0	200,000	NA
Fixed loans	NA	25,000	0	25,000	NA
<b>Total at 31 December 2023</b>		<b>1,025,000</b>	<b>525,000</b>	<b>500,000</b>	

<sup>1</sup> The weighted average interest rate of the withdrawn amounts at the end of the period

<sup>2</sup> Outstanding the 31st of December 2023: maturities between 4th of January and 12th of February 2024

<sup>3</sup> Maturity on the 4th of January 2024

All short-term loans are subscribed by Fluvius System Operator cv in the name and on behalf of the Mission Entrusted Associations who stand surety for their part and act as joint co-debtor except for the bank overdrafts.

The **fair value** of the loans is included in the note '[25 Financial instruments: policy and fair value](#)'.

## 23 Employee benefit liabilities

### Defined contribution plans

Employees hired after 1 January 2002 and the executive staff hired after 1 May 1999 are entitled to defined contribution plans: these pension plans provide a lump sum on retirement resulting from the contributions paid and the return granted by the pension institutions, as well as a lump sum and orphan interests in case of decease before retirement. The financing is carried out by employee contributions and employer contributions that are deposited in pension funds (Powerbel and Enerbel) and group insurances.

The assets are managed within a Luxembourg Fund (Esperides), divided in 4 investment zones, each representing a different risk profile (low risk, medium risk, high risk and dynamic asset allocation). The risk level also has to be managed taking into account the age of the members. This is why the trustees of Powerbel have proposed to the members a new option (2015) to manage their assets. This option, called 'Life-Cycle', offers an evolution of the risk exposure from growth to more defensive throughout the member's career. Each year the participant has the opportunity to change his investment strategy, for the future allowances of the employer or for the totality of the accumulated sums in his account.

As of 2018, the employer contributions with respect to O.F.P. Enerbel are calculated according to the PUC method with projection of future contributions. The employee contributions are still valued according to the PUC method without projection of future contributions because those are independent to seniority.

The legally guaranteed interest is variable and each year aligned to 85% of the average return over the last 24 months of linear bonds of the Belgian State (OLOs) with a duration of 10 years (at least 1,75% and maximum 3,75%).

The applied interest rate starting from 2016 is 1,75% and is applied, according to the vertical method, for all contributions paid to the pension funds and in the insurance company (products of TAK 21 with interest guarantee).

The pension funds are not subject to the Solvency II regulation of insurance companies and can obtain better expected returns by diversification of their investments. Hence, the reserves and a compensation of the group insurance was transferred during 2016 to a pension fund (OFP Powerbel/OFP Enerbel) as a cash-balance plan with a minimum guaranteed return of 3.25%.

As from 2018, executives were offered the opportunity to move from pension fund Powerbel to the cash balanced plan Powerbel New. For the accumulated rights a "Cash Balance" system applies, meaning that the regulated formula determines the employer contributions and the return is fixed at 3.25%. No employee contributions are foreseen. Allowances in case of decease and incapacity are defined benefit, meaning that those different allowances are determined by a formula. The contributions to be paid will be adjusted to this target.

On April 1, 2019, the entire contractual staff of the ex-Infrac MEAs and of ex-Integan were taken over by Fluvius System Operator. The employees of ex-Infrac and ex-Integan retain their fixed contribution scheme at Ethias. The pension obligations of ex-Infrac executives, who have switched to the Fluvius SO status, and ex-Integan executives have been included in the existing structure Cash Balance Plan Powerbel New. The executives who have not switched to the Fluvius SO status, retain their fixed contribution scheme at Ethias. Ex-Infrac executives will each year be given the option to switch to Fluvius SO status. In that case they will be affiliated to the Cash Balance Powerbel New Plan. Employees who will be promoted to executives in the future will also be affiliated to the Cash Balance Powerbel New Plan.

The fixed contribution plan at Ethias is managed horizontally, as a result of which a return guarantee of 1.75% is applied to the premiums from 2016 and for premiums before 2016 a return guarantee of 3.25%. The plan is evaluated according to the PUC method but without projection of future premiums.

## Defined benefit plans

The Collective Labour Agreement of 2 May 1952 stipulated an additional pension equal to 75% of the last annual salary after deduction of the legal pension at the end of a complete career, as well as a survival pension and an orphan allowance. This defined benefit plan has been fully paid up by the employer and the pensions have been paid out directly to the beneficiaries. The remaining subsequent obligations are for the largest part related to current pensions.

The majority of the employees hired before 1 January 2002 and the executive staff hired before 1 May 1999 are entitled to defined benefit plans which provide in the payment of a lump sum on retirement, and a lump sum and orphan interest in case of decease before retirement. These benefits are calculated taking into account the last annual salary and past service. The financing is carried out by employee contributions and employer contributions that are deposited in pension funds (OFP Elgabel and OFP Pensiobel) and group insurances.

Due to changes to the pension regulation in Belgium, the members of the pension plan Pensiobel have been offered the opportunity to move as from 1 January 2015 to the defined contribution plan

Powerbel. The accumulated and improved acquired rights (in Pensiobel) are capitalized at market returns but with a minimum return equal to 3.25% (the guaranteed return in a cash-balance Best-off plan is the maximum between 3.25% and the average return of the fund).

Following negotiations on sector level, an agreement was reached in 2020 on a "renewed" pension plan - the Master Plan. On 1 October 2020, the conditions of the Master Plan were fixed in a Collective Labour Agreement: as of 1 January 2022, changes will be effective to the defined benefit plan Elgabel for baremised employees with old employment conditions. Also as of 1 January 2022 the solidarity fund within the O.F.P. Elgabel was abolished and became part of the O.F.P. Elgabel; the possibility was included to transfer possible surpluses of the O.F.P. Elgabel, under certain conditions, to another pension fund and improvements were also made to the fixed contribution plan-Enerbel.

The Group also grants **post-retirement allowances** being the reimbursement of healthcare costs and tariff benefits.

The **other long-term employee benefits** contain provisions for retirement and jubilee bonuses and holidays carried over or overtime.

The current defined benefit plans are financed through pension funds in which the assets, dedicated to specific plans, are identified. Belgian legislation and the pension regulations provide that the dedicated assets should only finance the relevant benefits. This results in determining an **asset ceiling**. The determination of the asset ceiling takes into consideration the projected total benefit payable under the assumptions and as per the pension plan rules.

## Right of reimbursement

Since the expenses related to the employee benefits are reclaimable from the Mission Entrusted Associations, rights of reimbursement, equal to the employee benefit liability reported in the balance sheet, are recognized.

The major actuarial assumptions used at balance sheet date to determine the provision for employee benefits and other allowances are summarized below.

Depending on the status of the staff members, the pension plans and the related discount rates differ, as do the expected salary increases and staff turnover.

Liabilities

	2024	2023
Discount rate - pensions DB, cash balance, other contributions	3.16%	3.06%
Discount rate - pensions DC, health benefits, tariff advantages, leave	3.40%	3.25%
Expected average salary increase (inflation excluded) - old <sup>1</sup>	0.45%, 0.63%	0.45%, 0.67%
Expected average salary increase (inflation excluded) - new <sup>2</sup>	1.93%, 2.37%	2.02%, 2.42%
Expected average salary increase (inflation excluded) - additional	0.00%	0.00%
Expected inflation	2.10%	2.10%
Expected increase of health benefits (inflation included)	3.10%	3.10%
Expected increase of tariff advantages	2.10%	2.10%
Average assumed retirement age	63	63
Mortality table used	IA BE Prospective Tables	IA BE Prospective Tables
Turnover - old <sup>1</sup>	0.64%, 0.42%	0.41%, 0.40%
Turnover - new <sup>2</sup>	1.10%, 4.06%	1.73%, 3.91%
Life expectancy in years of a pensioner retiring at age 65: For a Person aged 65 at closing date:		
- Male	20	20
- Female	24	24
For a Person aged 65 in 20 years:		
- Male	22	20
- Female	26	26

<sup>1</sup> Old: relates to executive staff recruited before 1 January 2002 and management staff recruited before 1 May 1999

<sup>2</sup> New: relates to executive staff hired after 1 January 2002 and management staff hired after 1 May 1999

**Accounting treatment**

The notes below include for 2024 and 2023 only the provision for employee benefits according to IAS19.

**Amounts recognized in comprehensive income**

(In thousands of EUR)	2024	2023
Current Service cost (employer only) - tax on service cost included	-29,803	-28,208
Interest expense	-25,777	-29,432
Interest income - interest income from asset ceiling excluded	20,466	22,473
Past service cost	0	-1,844
Actuarial gains and (losses) recognised immediately in profit or loss	-2,943	-13,866
<b>Total costs included in profit or loss</b>	<b>-38,057</b>	<b>-50,877</b>
Actuarial (gains) losses on liabilities:		
changes in financial assumptions	-5,311	16,113
changes in demographic assumptions	-118	-849
effect of experience adjustments	5,692	8,103
Actuarial (gains) losses on assets	-35,687	-14,268
Effect of variation of the asset ceiling	3,397	-7,386
<b>Total costs included in other comprehensive income</b>	<b>-32,027</b>	<b>1,713</b>

Liabilities

**Amounts recognized in the balance sheet**

(In thousands of EUR)	Present value of funded defined benefit obligation	Fair value of plan assets	Total
Pensions - funded status	566,877	-724,515	<b>-157,638</b>
Pensions - unfunded status	28,212	0	<b>28,212</b>
Healthcare costs, tariff benefits - unfunded status	110,936	0	<b>110,936</b>
Other long-term employee benefits - funded status	21,130	-25,645	<b>-4,515</b>
Other long-term employee benefits - unfunded status	110,980	0	<b>110,980</b>
Impact on minimum funding requirement/effect of asset ceiling	0	33,105	<b>33,105</b>
<b>Total defined benefit obligation and long-term employee benefits at 31 December 2024</b>	<b>838,135</b>	<b>-717,055</b>	<b>121,080</b>
Pensions - funded status	552,240	-676,025	<b>-123,785</b>
Pensions - unfunded status	30,286	0	<b>30,286</b>
Healthcare costs, tariff benefits - unfunded status	113,359	0	<b>113,359</b>
Other long-term employee benefits - funded status	21,566	-23,822	<b>-2,256</b>
Other long-term employee benefits - unfunded status	106,912	0	<b>106,912</b>
Other	0	28,826	<b>28,826</b>
<b>Total defined benefit obligation and long-term employee benefits at 31 December 2023</b>	<b>824,363</b>	<b>-671,021</b>	<b>153,342</b>

**Changes in the present value of the obligation**

(In thousands of EUR)	2024	2023
<b>Total at 1 January</b>	<b>-824,363</b>	<b>-793,956</b>
Actuarial gains (losses) - financial assumptions	6,863	-20,730
Actuarial gains (losses) - demographic assumptions	150	2,614
Actuarial gains (losses) - experience adjustments	-10,221	-19,117
Current service cost & taxes included	-29,803	-28,208
Participant contributions	-2,763	-2,160
Interest cost	-25,777	-29,432
Benefit payments & taxes included	47,779	68,470
Past service cost	0	-1,844
<b>Total at 31 December before tax on unfunded obligations</b>	<b>-838,135</b>	<b>-824,363</b>
Taxes on unfunded obligations	0	0
<b>Total at 31 December</b>	<b>-838,135</b>	<b>-824,363</b>

### Changes in the fair value of the plan assets

[In thousands of EUR]	2024	2023
<b>Total at 1 January</b>	<b>699,847</b>	<b>674,029</b>
Actuarial gains (losses) - correction on assets at 1 January	889	-17,291
Return on plan assets (excluding interest income)	34,800	31,559
Interest income	21,348	23,745
Employer contributions & taxes included	24,916	37,633
Participant contributions	2,763	2,160
Benefit payments & taxes included	-34,403	-51,988
<b>Total at 31 December</b>	<b>750,160</b>	<b>699,847</b>
Irrecoverable surplus (effect of asset ceiling)	-33,105	-28,826
<b>Total at 31 December</b>	<b>717,055</b>	<b>671,021</b>

### Changes in asset ceiling

[In thousands EUR]	2024	2023
Total at 1 January	28,826	34,941
Interest income	882	1,271
Changes in asset ceiling	3,397	-7,386
<b>Total at 31 December</b>	<b>33,105</b>	<b>28,826</b>

### Changes in other comprehensive income

[In thousands EUR]	2024	2023
Total at 1 January	55,737	54,024
Other comprehensive loss (gain)	-32,027	1,713
<b>Total at 31 December</b>	<b>23,710</b>	<b>55,737</b>

### Classification of the plan investments on the balance sheet date

#### The classification of the plan investments in function of the major category at the end of 2024:

Category	Elgabel %	Other %	Pensiobel %	Insurance companies %	Powerbel and Enerbel %	Total %
<b>Investments quoted in an active market</b>	<b>91.08</b>	<b>93.90</b>	<b>90.18</b>	<b>100.00</b>	<b>91.42</b>	<b>91.34</b>
Shares (Eurozone)	15.67	14.51	11.07	0.00	11.87	13.54
Shares (Outside eurozone)	15.87	17.74	9.81	0.00	16.10	14.95
Government bonds (Eurozone)	2.42	2.47	4.62	50.00	9.73	5.29
Other bonds (Eurozone)	28.17	29.26	35.06	50.00	27.18	29.32
Other bonds (Outside eurozone)	28.94	29.93	29.61	0.00	26.54	28.24
<b>Unquoted investments</b>	<b>8.92</b>	<b>6.10</b>	<b>9.82</b>	<b>0.00</b>	<b>8.58</b>	<b>8.66</b>
Real estate	2.47	2.52	1.51	0.00	2.84	2.40
Cash and cash equivalents	0.26	1.38	0.22	0.00	0.70	0.48
Other	6.20	2.20	8.08	0.00	5.04	5.78
<b>Total in %</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>
<b>Total (In thousands of EUR)</b>	<b>326,151</b>	<b>68,139</b>	<b>129,404</b>	<b>5,213</b>	<b>221,252</b>	<b>750,160</b>

#### The classification of the plan investments in function of the major category at the end 2023:

Category	Elgabel %	Other %	Pensiobel %	Insurance companies %	Powerbel and Enerbel %	Total %
<b>Investments quoted in an active market</b>	<b>94.57</b>	<b>94.31</b>	<b>93.73</b>	<b>100.00</b>	<b>90.87</b>	<b>93.44</b>
Shares (Eurozone)	11.18	11.48	7.44	0.00	9.71	10.00
Shares (Outside eurozone)	23.91	21.01	20.26	0.00	18.88	21.33
Government bonds (Eurozone)	0.00	0.00	0.00	50.00	6.71	2.35
Other bonds (Eurozone)	25.41	26.41	28.90	50.00	24.67	26.21
Other bonds (Outside eurozone)	34.08	35.40	37.14	0.00	30.90	33.55
<b>Unquoted investments</b>	<b>5.43</b>	<b>5.69</b>	<b>6.27</b>	<b>0.00</b>	<b>9.13</b>	<b>6.56</b>
Real estate	2.24	2.31	1.46	0.00	2.77	2.22
Cash and cash equivalents	2.35	3.23	2.58	0.00	2.62	2.53
Other	0.83	0.16	2.23	0.00	3.74	1.80
<b>Total in %</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>
<b>Total (In thousands of EUR)</b>	<b>303,285</b>	<b>70,348</b>	<b>128,601</b>	<b>7,425</b>	<b>190,189</b>	<b>699,848</b>



## Breakdown of the defined benefit obligation by type of plan participants and by type of benefits

[In thousands of EUR]	2024	2023
<b>Breakdown of defined benefit obligation by type of plan participants</b>	<b>-838,135</b>	<b>-824,363</b>
Active plan participants	-611,434	-593,139
Terminated plan participants with deferred benefit entitlements	-112,735	-111,209
Retired plan participants and beneficiaries	-113,965	-120,015
<b>Breakdown of defined benefit obligation by type of benefits</b>	<b>-838,135</b>	<b>-824,363</b>
Retirement and death benefits	-616,218	-604,092
Other post-employment benefits (medical and tariff reductions)	-110,936	-113,359
Jubilee bonuses (Seniority payments)	-110,980	-106,912

## The results of the sensitivity analysis are included below to explain the impact of the assumptions

[In thousands of EUR]	Effect: increase [-] / decrease [+]
Discount rate [+0,25%]	14,483
Inflation [+0,25%]	-12,515
Salary increase [+0,10%]	-4,846
Healthcare increase [+0,10%]	-123
Tariff advantages [+0,50%]	-2,048
Employee turnover [+0,50%]	12,273
Life expectancy of pensioners [+1 year]	-6,417

The annual balance of the defined benefit lump sum is financed by the Group through a recurrent allocation expressed as a percentage of the total payroll. This percentage is defined by the aggregate cost method and is reviewed annually. This method of financing is used to smooth out

future costs over the remaining period of the plan. The costs are estimated on projected bases (salary growth and inflation taken into account).

The assumptions related to salary increase, inflation, employee turnover and age-term are defined on the basis of historical statistics of the Group. The mortality tables used are the ones corresponding to the observed experience within the financing vehicle. The discount rate is established with regard to the investment strategy of the companies.

These assumptions are challenged on a regular basis.

Exceptional events (such as modification of the plan, change of assumptions, too short degree of coverage...) can eventually lead to additional payments by the Group.

The **average duration** of the defined benefit obligation at 31 December 2024 is 6 years (2023: 6years) and 15 years at 31 December 2024 for the defined contribution obligations (2023: 15 years).

Expected payments or contributions to the defined benefit plan in future years:

[In thousands of EUR]	2024
Within the next 12 months	1,656
Between 1 and 5 years	5,271
Between 5 and 10 years	3,254
Beyond 10 years	811

## Actuarial risks

The defined benefit plans expose the Group to various actuarial risks.

## Investment risk

The present value of the defined benefit plan liability is calculated using a discount rate determined to high quality corporate bond yields. If the return on plan asset is below this rate, it will create a plan deficit. Currently the plan has a relatively balanced investment which is reported in the table below 'Classification of the plan investments on the balance sheet date'.

Due to the long-term nature of the plan liabilities, the pension fund's board considers it appropriate that a reasonable portion of the plan assets should be invested in equity securities to leverage the return generated by the funds.

### Interest rate risk

A decrease in the bond interest rate will increase the plan liability. However, this will be partially offset by an increase in the return on the plan's debt investments.

### Longevity risk

The present value of the defined benefit plan liability is calculated by reference to the best estimate of the mortality of plan participants both during and after their employment. An increase in the life expectancy of the plan participants will increase the plan's liability.

Prospective mortality tables are being used to reflect the improved life expectations in the future, as defined in the IAS 19 standard.

### Salary risk

The present value of the defined benefit plan liability is calculated by reference to the future salaries of plan participants. As such, an increase in the salary of the plan participants will increase the plan's liability.

## 24 Trade payables and other liabilities, liabilities cash pool activities, current tax liabilities

[In thousands of EUR]	2024	2023
Trade debts	130,852	142,318
Invoices to be received	47,032	60,935
<b>Subtotal</b>	<b>177,884</b>	<b>203,253</b>
VAT	22	151
Taxes payable on remuneration	12,634	12,078
Remuneration and social security	114,255	100,193
Other current liabilities	124,741	113,857
<b>Other current liabilities</b>	<b>251,652</b>	<b>226,279</b>
<b>Total trade payables and other current liabilities</b>	<b>429,536</b>	<b>429,532</b>
<b>Liabilities cash pool activities</b>	<b>170,392</b>	<b>86,647</b>
<b>Current tax liabilities</b>	<b>3,962</b>	<b>3,619</b>

**Trade payables and other current liabilities** amount to 429,536 k EUR at 31 December 2024 and 429,532 k EUR at 31 December 2023, a decrease of 4 k EUR.

The items trade debts and invoices to be received remain increases [2024: 177,884 k EUR; 2023: 203,253 k EUR].

The trade payables on the MEAs amounted to -2,498 k EUR at the end of 2024 and 13,027 k EUR at the end of 2023.

The 'other current liabilities' for an amount of 124,741 k EUR at the end of 2024 [2023: 113,857 k EUR] contain mainly accrued costs relating to the finance costs for issuing bonds, the car fleet and Information & Communication Technology projects [2024: 121,741 k EUR; 2023: 86,914 k EUR], the increase is mainly due to the attributable costs for the loans [2024: 101,600 k EUR; 2023: 67,850 k EUR].

Liabilities related to employee benefits increase by 14,062 k EUR due to higher social security debt, provision for holiday pay, and other social liabilities.

The **payable cash pool activities** amount to 107,392 k EUR at the end of 2024 and 86,647 k EUR at year end of 2023 (see note '19 [Trade and other receivables, receivables cash pool activities](#)').

The **payment term and conditions for these payables** are as follows: For the standard trade contracts, the average payment term was 34 days. The Value Added Tax payable and the withholding tax payable were due 20 and 15 days respectively after the end of the month. All amounts were paid on their expiry date.

# Financial instruments

## 25 Financial instruments: policy and fair value

### Risks

It is the Group's intention to understand all risks separately, as well as their mutual connections, and to define strategies in order to manage the economic impact on the Group's results. The Audit Committee is responsible for reviewing the risk analysis, for the approval of the recommended risk management strategies, for compliance with the guidelines on risk management and reporting.

The Group's functioning as the operating company for the Mission Entrusted Associations limits to a large degree the risks and their possible negative impact.

### Equity structure

The Group's equity structure consists of equity and the financial liabilities.

Apart from the legally required minimum levels for equity that are applicable for Fluvius System Operator and its subsidiaries, investments in joint ventures and associates, the Group is not subject to any externally required qualifications for its capital structure.

Within the Group short-term financing has been called upon to support the working capital. The long-term loans are contracted by Fluvius System Operator to finance the MEAs and are lent through at the same conditions as the contracted loans.

### Credit risk

The credit risk comprises the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation.

The maximum credit risk is each financial asset's balance sheet value.

The Group recharges its costs mainly to its shareholders, its non-controlling interests and the associates.

As regards the on-lending of funds from the issuance of bond loans – and the recognition as short and long-term receivables from the Mission Entrusted Associations – the principle applies that each MEA guarantees on a non-principal and non-solidary basis but limited to the proportional share of its contribution (see note '22 Interest bearing loans and borrowings'). The credit risk for this category of customers is limited and the calculations did not give rise

to a recognition of impairment losses. These calculations also took into account the Flemish government's support that can be called upon in case of credit problems. Based on this risk profile, an impairment amount of 1,590 k EUR has been recognised.

Impairments are recognised for receivables from external customers. These receivables include invoicing for work carried out (connections, installation of electricity and gas pipelines), damage claims, fraud cases, invoicing for Energy Services to Local Authorities and Energy Service Companies (ESLA/ESCO)<sup>1</sup>, invoicing for public lighting and invoicing to Ministries.

### Movements in accumulated impairments on trade receivables

[In thousands of EUR]	2024	2023
<b>Total at 1 January</b>	<b>-41,671</b>	<b>-40,654</b>
Charge of impaired receivables	-6,516	-4,457
Write-back of impaired receivables	9,724	3,440
<b>Total at 31 December</b>	<b>-38,463</b>	<b>-41,671</b>

### Information on the credit risk of the Group's external trade receivables

[In thousands of EUR]	Total	Current	Days past due				
			<30 days	30-60 days	61-90 days	91-180 days	>180 days
Expected credit loss rate	<b>35.2%</b>	0.9%	3.8%	5.1%	5.9%	19.0%	75.7%
Carrying amount	<b>104,750</b>	45,676	5,234	2,458	1,533	2,963	46,886
Expected credit loss	<b>36,873</b>	421	198	125	90	563	35,476

### Currency risk

The Group is not substantially exposed to currency risk since transactions in currencies other than the euro are limited.

<sup>1</sup> Energy services will be abolished as of 1 January 2025, with a transitional measure allowing these activities to continue until 31 December 2027 at the latest, provided that these activities have already started by 31 December 2024 at the latest.

### Liquidity risk

The liquidity risk implies the risk that the Group will not meet its financial obligations. The Group limits this risk by continually scrutinizing cash flows and by taking care that a sufficient number of credit facilities are available.

The Group calls upon several banks to attract resources on short term. Commercial paper was issued within the framework of a treasury bill programme. Fixed loans (straight loans) can be called on with a maturity from one day or one month up to twelve months and whereby the minimum maturity depends on the borrowing bank. Fixed advances can be called on with a maturity of one week up to twelve months. All short-term loans have a fixed interest rate during the term of the loan except for the bank overdraft which has a variable interest rate. These funds are mainly drawn to finance a negative cash pool balance (see note '22 Interest bearing loans and borrowings').

The Group enters into long-term loans to finance the MEAs. These long-term loans were fully lent on at the same conditions as the contracted loans. The MEAs use these resources to finance the investments in the distribution grids including the roll-out of the digital meter, the realisation of the energy transition, the maintenance and the rehabilitation of the grids (electricity, gas, but also sewerage), the construction of heating grids, the acquisition and refurbishment into LED of the public lighting infrastructure, the financing of participations, the refinancing of loans and to pay interest as well as working capital.

In 2010, the Group issued the first bond loans for private investors in Belgium and the Grand Duchy of Luxembourg. Thanks to this step, funding sources were further diversified and broadened, so that a safe, reliable, efficient and innovative distribution of energy to the customers could be assured.

In order to be able to easily address the market of institutional investors, a credit rating was requested. In October 2011, **'Moody's Investors Service Ltd.'** (**"Moody's"**) granted the former company Eandis System Operator a rating. Later, a rating was also obtained from **'Creditreform Rating AG'** (**"Creditreform"**). To determine the creditworthiness of Fluvius, the accounts of the distribution system operators were also taken into account, given its close connection with its shareholders. As a result, the rating is assessed on the basis of the financial statements of the 'Fluvius Economic Group'.

Between October 2021 and October 2024, Fluvius credit rating at Moody's was A3 with a stable outlook. However, on 8 October 2024, Moody's decided to maintain the A3 rating, but to bring the rating's outlook from stable to negative. Moody's predominantly argued that they expect Fluvius Economic Group's financial ratios – without balance sheet strengthening measures – to remain below the thresholds for the current A3 rating during the regulatory tariff period 2025-2028.

Moody's has also assigned an ESG (Environmental, Social and Governance) Credit Impact Score (CIS) of 3 (on a scale of 1 to 5). Fluvius's CIS-3 reflects a moderately negative exposure to social and environmental risks and a neutral to low risk for governance. The impact of those considerations on the rating is mitigated by the Group's supportive regulatory framework.

Mid-2023, Fluvius decided to cease its active participation in the rating procedure at **Creditreform**. From that date onwards, all rating information published by Creditreform is therefore on a non-solicited basis. In the course of 2024, Creditreform has maintained this rating at 'A', but switched the outlook from stable to negative.

**In 2024, Fluvius launched a project to investigate how to strengthen Fluvius Economic Group's equity** in a context of increasing debt levels. Such an operation should improve the balance sheet situation, stabilise the credit rating and, ultimately, benefit the Group's funding cost. A sound financial basis is an absolute prerequisite for the realisation of the Fluvius Economic Group's strategic objectives in the next few years, certainly taking into account the significant investments ahead. The starting point for this analysis was a strengthening of group equity by attracting a domestic/foreign private/public consortium led by a Flemish investor, with or without the possibility of an IPO at a later stage. The project was split up in two parts: first a 'landscaping' phase and then an implementation phase. In the landscaping exercise, the investigation focuses on which possibilities are feasible to attract capital, how that could be carried out, which conditions have to be fulfilled then etc. At the end of 2024, the landscaping was not finalised yet. The project will be continued in 2025.

Since 2011, Fluvius System Operator – via Eandis System Operator – had a 5,000,000 k EUR Euro Medium Term Note **[EMTN] programme** for issuing bonds and which ran through 2021. At the end of 2019, an amount of 2,980,500 k EUR or 59.61% had been issued. Since year end 2014 no more bonds were issued under this programme. This EMTN-programme has since been terminated. On top of this, Fluvius, via Infracore, issued bonds in the framework of its 500,000 k EUR EMTN programme launched in 2013. By issuing two bonds of 250,000 k EUR each (in 2013 and 2014), this programme was fully utilised. A new 5,000,000 k EUR Fluvius EMTN programme for issuing bonds was launched on 1 July 2020 with a maturity of 10 years, extendable by Fluvius for a maximum of 24 months. The issues are guaranteed by the Group's eleven mandated associations. At the end of 2024, an amount of 4,640,000 k EUR or 92.80% of the programme's total amount had been issued. That is why Fluvius updated and extended the EMTN programme in 2024. With a view to the substantial funding needs for the Fluvius Economic Group, Fluvius recognized the need for large flexibility and diversity in funding possibilities and to attract the largest possible investor base. So it was decided to raise the programme's maximum issuance amount to 10,000,000 k EUR. It was also decided to list new EMTN issuances at the non-regulated market Euronext Growth Brussels.

Next to this, Fluvius has fully updated its existing Green Financing Framework, approved by the Board of Directors on 23 October 2024. This framework enables Fluvius to issue so-called **green debt instruments**. The accompanying 'Second Party Opinion' was delivered by Sustainable Fitch (19 December 2024).

All funds from the bond loans were fully lent on to the mandated associations at the identical conditions as the bond loans themselves. The resulting receivables for the Group are included in notes '17 Long- and short-term receivables, other'.

An overview of the loans is included in the note '22 Interest bearing loans and borrowings'. A bank loan (2024: 23,625 k EUR; 2023: 27,125 k EUR) was not lent on.

**The following schedule shows the maturity schedule (at nominal value) of the different loans:**

**At the end of 2024:**

(In thousands of EUR)	2024	1 year or less	2-3 year	4-5 year	More than 5 year
Bond issue - retail	440,000	200,000	240,000	0	0
Bond issue - EMTN	5,810,500	0	400,000	1,354,500	4,056,000
Bond issue - private	440,000	0	50,000	0	390,000
Bank loans - with derivative structure	23,625	3,500	7,000	7,000	6,125
Bank loans - fixed interest rate	748,000	15,231	380,462	230,462	121,845
Loans from third parties	32,000	0	0	32,000	0
<b>Total</b>	<b>7,494,125</b>	<b>218,731</b>	<b>1,077,462</b>	<b>1,623,962</b>	<b>4,573,970</b>
<b>Total bullet payment</b>	<b>7,470,500</b>	<b>215,231</b>	<b>1,070,462</b>	<b>1,616,962</b>	<b>4,567,845</b>
<b>Total excluded bullet payment</b>	<b>23,625</b>	<b>3,500</b>	<b>7,000</b>	<b>7,000</b>	<b>6,125</b>

**At the end of 2023:**

(In thousands of EUR)	2023	1 year or less	2-3 year	4-5 year	More than 5 year
Bond issue - retail	440,000	0	200,000	240,000	0
Bond issue - EMTN	5,110,500	0	400,000	554,500	4,156,000
Bond issue - private	440,000	0	0	50,000	390,000
Bank loans - with derivative structure	27,125	3,500	7,000	7,000	9,625
Bank loans - fixed interest rate	550,000	0	0	550,000	0
Loans from third parties	32,000	0	0	32,000	0
<b>Total</b>	<b>6,599,625</b>	<b>3,500</b>	<b>607,000</b>	<b>1,433,500</b>	<b>4,555,625</b>
<b>Total bullet payment</b>	<b>6,572,500</b>	<b>0</b>	<b>600,000</b>	<b>1,426,500</b>	<b>4,546,000</b>
<b>Total excluded bullet payment</b>	<b>27,125</b>	<b>3,500</b>	<b>7,000</b>	<b>7,000</b>	<b>9,625</b>

**Information regarding the repayment schedule of the lease obligations of the undiscounted payments of the lease liabilities:**

(In thousands of EUR)	Lease Liabilities total	1 year or less	1-3 year	4-5 year	More than 5 year
2024	41,007	11,407	16,506	8,877	4,217
2023	38,409	10,116	18,958	6,795	2,540

### Long-term receivables and short-term receivables, other:

- From the DSOs The Group has long-term receivables and short-term receivables at 31 December 2024 totaling 7,223,269 k EUR (2023: 6,540,500k EUR). Of these, 215,231 k EUR (2023: 0 k EUR) is receivable within one year, 1,070,462 k EUR (2023: 600,000 k EUR) is receivable within more than one to three years, 1,584,962 k EUR (2023: 1,394,500 k EUR) is receivable within more than three to five years and 4,567,845 k EUR (2023: 4,546,000 k EUR) is receivable after five years.
- Related to Wyre bv as of 31 December 2023, the Group has a long-term receivable for 32,000 k EUR recoverable on 18 July 2028.
- Related to Telenet as at 31 December 2023, the Group has a discounted long-term and short-term receivable for a total of 91,814 k EUR, of which 20,000 k EUR are collectible over 6 years with a maturity date of 30 June 2029 (see note '13 Investments in associates and joint ventures').

### Interest rate risk

The Group has entered into long-term loans with a fixed and variable interest rate. The loans with a variable interest rate have been swapped to a fixed interest rate (see note '16 Derivative financial assets').

The resulting financial costs for Fluvius System Operator are all passed on to the MEAs and are reported as a financial income, except for the financial costs related to a bank loan of 23,625 k EUR, which is not lent through.

### The interest payment for the following years, calculated on the basis of the current interest rate is as follows:

[In thousands of EUR]	2024	2023
In 2024	0	148,870
In 2025	191,757	158,488
In 2026	187,167	154,371
In 2027	179,577	147,253
In 2028	158,778	126,927
In 2029	153,719	122,341
In 2030 and beyond	614,386	461,748
<b>Total</b>	<b>1,485,384</b>	<b>1,319,997</b>

### Other

More detailed information regarding the risks faced by the Group and its shareholders is included in the EMTN Information Memorandum (27 January 2025) regarding the bond issue programme for bond loans. These documents can be consulted on our website [www.fluvius.be](http://www.fluvius.be).

### Fair value

The fair value is the amount for which an asset could be exchanged or a liability settled between knowledgeable, willing parties that are independent in a transaction at arm's length and not in a forced sale or liquidation sale.

### Fair value hierarchy

The Group uses the following fair value hierarchy classification to determine and classify the fair value of the financial instruments by a valuation technique:

- Level 1: valuation is based on quoted (unadjusted) prices in an active market for identical assets or liabilities
- Level 2: other techniques for which all input with a significant impact on the recorded fair value can be observed either directly or indirectly
- Level 3: techniques that use input with a significant impact on the recorded fair value that is not based on observable market data

The fair value of the outstanding listed bonds, issued for a total amount of 6.250,5 million EUR varies according to the market interest rate. The fair value at 31 December 2024 amounts to 6,072.3 million EUR and differs from the amount that will be reimbursed and the carrying value.

**The fair values at 31 December 2024 are as follows:**

[In thousands of EUR]	Fair value			Book value
	Level 1	Level 2	Level 3	
Other investments	0	0	912	912
Long-term receivables, other	7,187,120	0	0	7,363,828
Short-term receivables, other	232,399	0	0	233,879
Cash and cash equivalents	1,084	0	0	1,084
Trade and other receivables	209,385	0	0	209,385
Receivables cash pool activities	136,888	0	0	136,888
<b>Total</b>	<b>7,766,876</b>	<b>0</b>	<b>912</b>	<b>7,945,976</b>
Loans on long-term	7,098,686	0	0	7,244,636
Loans on short-term	275,278	0	0	276,742
Derivative financial instruments	0	276	0	276
Trade payables and other current liabilities	429,536	0	0	429,536
Liabilities cash pool activities	170,392	0	0	170,392
<b>Total</b>	<b>7,973,892</b>	<b>276</b>	<b>0</b>	<b>8,121,582</b>

**The fair values at 31 December 2023 are as follows:**

[In thousands of EUR]	Fair value			Book value
	Level 1	Level 2	Level 3	
Other investments	0	0	889	889
Long-term receivables, other	6,443,210	0	0	6,709,989
Short-term receivables, other	18,107	0	0	18,107
Cash and cash equivalents	61,605	0	0	61,605
Trade and other receivables	416,714	0	0	416,744
Receivables cash pool activities	256,740	0	0	256,740
<b>Total</b>	<b>7,196,376</b>	<b>0</b>	<b>889</b>	<b>7,464,074</b>
Loans on long-term	6,329,346	0	0	6,564,501
Loans on short-term	528,500	0	0	528,500
Derivative financial instruments	0	101	0	101
Trade payables and other current liabilities	429,532	0	0	429,532
Liabilities cash pool activities	86,647	0	0	86,647
<b>Total</b>	<b>7,374,025</b>	<b>101</b>	<b>0</b>	<b>7,609,281</b>

The other investments included in level 3 concern business centres and other companies. The fair value is based on their latest available Belgian financial statements which were published with the Central Balance Sheet Office of the National Bank of Belgium. The calculation of the fair value is based on this information, taking into account the share percentage in the company.



# Other information

## 26 Related parties

Transactions between Fluvius System Operator and its subsidiaries have been eliminated in the consolidation process and are therefore not included in the present note.

The total remunerations paid to the Management Committee and the directors for 2024 amounted to 3,852 k EUR and 4,072 k EUR for 2023. The post-employment benefits included in the total remuneration mentioned amounted to 211 k EUR for 2024 (235 k EUR for 2023). There are no other benefits in kind, share options, credits or advances in favour of the directors.

### Transactions of the Group with companies with a non-controlling interest (Farys and De Watergroep) were as follows:

[In thousands of EUR]	2024	2023
<b>Amount of the transactions</b>		
Recharge of costs to non-controlling interest companies	95,662	86,798
Recharge of costs from non-controlling interest companies	-2,324	-3,389
<b>Amount of outstanding balances</b>		
Trade and other receivables	11,091	9,748
Trade payables and other liabilities	306	969

### Transactions of the Group with other companies [Atrias, Synductis and Wyre Holding] were as follows:

[In thousands of EUR]	2024	2023
<b>Amount of the transactions</b>		
Recharge of costs to associates	8,433	8,331
Recharge of costs from associates	-45,890	-40,554
<b>Amount of outstanding balances</b>		
Trade and other receivables	5,902	3,868
Trade payables and other liabilities	970	4,437
Provide financing	58,674	70,082

## Transactions of the Group with its shareholders [Mission Entrusted Associations] were as follows:

[In thousands of EUR]	2024	2023
<b>Amount of the transactions</b>		
Recharge of costs to the Mission Entrusted Associations	2,564,581	2,212,427
Recharge of costs from the Mission Entrusted Associations	-59,067	-47,070
Interest income Mission Entrusted Associations	187,119	153,924
Interest expenses Mission Entrusted Associations	-9,724	-5,898
<b>Amount of outstanding balances</b>		
Non-current assets, employee benefits	121,079	153,342
Non-current assets, other	7,229,786	6,550,045
Short-term receivable, other	215,231	0
Trade receivables, invoices to be issued	2,556	212,477
Other receivables, cash pool	-7,560	179,893
Other receivables, accrued financial income bond loan	103,102	68,477
Non-current assets, other	32,000	32,000
Other current liabilities	476	25,196
Trade payables	-2,498	13,030
<b>Guarantees and securities received</b>		
Concerning financial obligations	825,000	825,000

All invoices to and from the Mission Entrusted Associations are payable within 30 days after invoice date. Due to the preparations for the structural changes taking place as of 1 January 2025 [see notes 'Shareholder structure [see page 18]' and 'Changes in the operating area and structure of the Fluvius Economic Group [see page 19]'].

## Membership of professional organisations

Fluvius System Operator is a member of several professional organisations, including:

- AquaFlanders, a non-profit organisation with the objective of supporting the Flemish water companies and sewer managers
- The Association of European Smart Grid Distribution System Operators (EDSO for Smart Grids ivzw)
- Vzw Flux50, the member organisation for innovation in energy transition and energy renovation in Flanders
- ODE Vlaanderen vzw (Organisation for Sustainable Energy Flanders)
- Synergrid vzw, a joint interest group of the operators of networks in Belgium of transmission of electricity, of transport of natural gas and of the distribution of electricity and natural gas
- VLARIO vzw, acting as a consultation platform and knowledge centre for the sewerage and wastewater treatment sector in Flanders
- Vzw VVSG (Association of Flemish Cities and Municipalities) that represents the interests of the local authorities, sharing knowledge and creating network opportunities.

During 2024, EY was paid 154 k EUR for performing its mandate as statutory auditor for the parent company Fluvius System Operator, supplemented by 524 K EUR for additional [statutory] assignments in the extension of the mandate as statutory auditor, as well as 19 k EUR for other assignments performed by related persons. The auditor's additional activities include limited assurance on the CSRD statements, procedures for comfort letters and the assurance on Green Bonds. All additional services were approved by the Audit Committee.

## 27 Commitments and contingencies

[In thousands of EUR]	2024	2023
Rent deposits, buildings	522	1,508
<b>Total guarantees given</b>	<b>522</b>	<b>1,508</b>
<b>Guarantees obtained from contractors and suppliers</b>	<b>493,508</b>	<b>216,714</b>

Committed orders at 31 December 2024 amounted to 72,127 k EUR (31 December 2023: 93,374 k EUR).

The Group is involved in legal disputes for which the risk of loss is possible but not likely. Currently, the possible timing of the settlements cannot be estimated reliably.

Also a dispute between Telenet and Proximus should be reported. Following the takeover by Telenet of the cable television customers and the establishment of a lease over the cable network, Proximus filed a complaint at the Court of First Instance in Antwerp calling for the contracts to be voided and claiming damages. This claim was rejected at first instance (judgment of 6 April 2009). Proximus appealed to the Antwerp Court of Appeal.

Proximus demanded the disclosure of all documents related to the agreement between Telenet, Interkabel Vlaanderen and the cable companies. It also demanded the annulment of these agreements and damages of EUR 1.4 billion based on an expert report it had commissioned. The above-mentioned agreements include a limitation of liability for the cable companies in the Fluvius Economic Group through an indemnity clause, at the expense of Telenet. As a result, in the event of a ruling against them, Interkabel Vlaanderen and the cable companies would in principle be obliged to compensate any losses incurred by Proximus only up to a maximum of EUR 20 million. The Court of Appeal fully rejected Proximus's claims in a ruling of 18 December 2017. At the end of June 2019, Proximus appealed this ruling to the Court of Cassation.

On 22 January 2021, the Court of Cassation ruled on this appeal and held that the ruling of the Antwerp Court of Appeal had to be partially annulled. The partial annulment only pertained to the point that the Antwerp Court of Appeal did not sufficiently justify its refusal to void the agreement between Telenet and the cable companies, but it did not rule on the merits on this point. The case has been sent to the Brussels Court of Appeal to examine and rule on this matter. The Court of Cassation therefore did not decide to overturn the ruling on Proximus's claim for damages. This would have meant that Proximus's claim for damages had been definitively rejected. The Court of Cassation therefore did not decide to overturn the ruling on Proximus's claim for damages.

On 16 June 2021, Proximus issued a summons to Telenet and the cable companies to appeal after cassation. Through these proceedings, Proximus is demanding the annulment of the agreements between Telenet and the cable companies. In addition, Proximus once again claims damages (currently estimated at EUR 1.00 provisionally) for unlawfully concluding and maintaining the agreements. Furthermore, Proximus is demanding that the performance of the agreements cease, and is seeking a preliminary injunction in the event that it is considered that no remedy/damages is possible for Proximus. In the first appellate conclusion filed by Proximus following the appeal in cassation, its provisional claim for damages had not yet been estimated. Also in Proximus's latest conclusion filed in December 2022, the damages it sought are still not estimated and its claim is still limited to EUR 1,00 provisionally. Proximus asks that the debate on the exact extent of the damages is only addressed in a second stage, following an interim judgment by the Court on the liability of Telenet and/or the intermunicipal associations. In subordinate order, Proximus requests the appointment of a court expert with the task of advising on damages. All parties have since filed their final conclusions. The date for the hearing is not yet confirmed.

On 3 September 2019, a gas explosion occurred in Wilrijk (Antwerp), resulting in one fatality, three cases of severe injury and significant material damage. The council chamber in Antwerp had referred the company Fluvius System Operator and two of its managers (namely the CEO and the Director of Network Operations) to the correctional court for their possible involvement in events that may have led to the explosion. The Antwerp correctional court cleared both Fluvius managers of criminal liability on 27 April 2021, finding them not personally responsible for the events. The court handed down a suspended sentence for the company Fluvius System Operator, and Fluvius was ordered to pay all civil claims. Fluvius is and remains of the opinion that the company, its managers, and staff are not at fault in the tragic events, and that the evidence and arguments presented by Fluvius in the course of the proceedings, which prove that Fluvius is not at fault, were not sufficiently taken into account. Based on these considerations, the company has appealed against this ruling by the Antwerp correctional court. An initial hearing in the appeals process took place on 18 May 2022. Following this hearing, on 1 June 2022, the Court of Appeal decided to appoint an expert from the civil interlocutory proceedings also for the criminal law aspect. The expert was to submit his report by 31 January 2023. The appeal hearing was scheduled for 29 March 2023. This hearing was postponed as the expert could not deliver his report on time. An additional appraisal was made on 9 August 2023; the final report was expected in early 2024. The court hearing took place on 13 November 2024.

## 28 Events after the reporting date

After the close of the 2024 fiscal year on 31 December 2024, the following significant facts and evolutions have occurred.

### Appeal proceedings against the establishment by VREG of the distribution grid fees electricity & gas 2025

Aligned with the decision to appeal the decision on the tariff methodology before the Markets Court, in January 2025 the individual DSOs went to the Council of State appealing the 16 decisions by VREG dated 17 December 2024 establishing the distribution grid fees for the year 2025. This additional proceedings is a necessary step in case that the Markets Court decides to annul the tariff methodology.

### Preliminary ruling by the Markets Court

In the proceedings relating to the energy regulator's decision on the E&G tariff methodology 2025-2028, the Markets Court handed down a preliminary ruling on 19 February 2025: the Court will submit three prejudicial questions to the Court of Justice of the European Union. This preliminary ruling does not have a suspensive effect, which means that the tariff methodology 2025-2028 will be applied for the 2025 electricity and gas grid fees.

### Gas explosion Wilrijk - appeal procedure

On 19 March 2025, the Antwerp Court of Appeal ruled in the case about the explosion in Wilrijk on 3 September 2019. This explosion was caused by a third party hitting a connection pipe with an excavating machine. Fluvius had appealed an earlier conviction by the Court of First Instance, as we believe that the cause of the explosion was not our fault. Despite an extensive defence, the Court of Appeal did not follow Fluvius and Fluvius was convicted to a fine and the payment of damage compensation to the civil parties. We are now analysing the ruling in detail to see what follow-up steps are possible. An appeal in cassation is under consideration.

### Rating at Creditreform Rating AG suspended

On 13 January 2025, Creditreform rating AG informed Fluvius that it had suspended the 'unsolicited' credit rating of Fluvius as from that same date 'due to business reasons'.

### Green bond issued

On 12 March 2025, Fluvius System Operator successfully issued a EUR 700 million green bond. This debt instrument has a 10-year maturity with a fixed annual coupon of 3.500%. This issuance is a major step towards financing the energy transition and climate adaptation in Flanders.

### Financing for Wyre

On 18 February 2025, Wyre announced that it had secured financing facility of EUR 500 million at EUROBOR +2.75%. This is the first external financing for Wyre, independent from its shareholders Telenet (66.8%) and Fluvius System Operator (33.2%). This financing facility will enable Wyre to support its roll-out ambitions and to fully fund its investments plans for the next years.

## 29 List of group entities included in the consolidation

### At 31 December 2024

Subsidiary	Office	Number of shares owned %	Voting rights %
<b>Parent</b>			
Fluvius System Operator cv	Brusselsesteenweg 199, B-9090 Melle		
<b>Subsidiary</b>			
De Stroomlijn cv	Brusselsesteenweg 199, B-9090 Melle	62.17	62.17
<b>Investment in joint ventures and associates</b>			
Synductis cv	Brusselsesteenweg 199, B-9090 Melle	34.38	34.38
Atrias cv	Koning Albert II-laan 37, B-1030 Brussel	50.00	50.00
Wyre Holding bv	Liersesteenweg 4, B-2800 Mechelen	33.20	33.20

### At 31 December 2023

Subsidiary	Office	Number of shares owned %	Voting rights %
<b>Parent</b>			
Fluvius System Operator cv	Brusselsesteenweg 199, B-9090 Melle		
<b>Subsidiary</b>			
De Stroomlijn cv	Brusselsesteenweg 199, B-9090 Melle	62.17	62.17
<b>Investment in joint ventures and associates</b>			
Synductis cv	Brusselsesteenweg 199, B-9090 Melle	34.38	34.38
Atrias cv	Koning Albert II-laan 37, B-1030 Brussel	50.00	50.00
Wyre Holding bv	Liersesteenweg 4, B-2800 Mechelen	33.20	33.20

# Information concerning the parent company

Information concerning the parent company

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# Information concerning the parent company

The following information is extracted from the statutory Belgian GAAP financial statements of the parent company, Fluvius System Operator cv and is presented in abridged form.

These statutory financial statements, together with the report of the Board of Directors to the General Assembly of Shareholders as well as the auditor's report, will be filed with the National Bank of Belgium within the legally foreseen time limits according to the Belgian company code.

These documents are also available as from 28 March 2025 on the website [www.fluvius.be](http://www.fluvius.be) or on request at the following address: Brusselsesteenweg 199, 9090 Melle.

The statutory auditor's report is unqualified and certifies that the financial statements of Fluvius System Operator cv are prepared in accordance with Belgian GAAP.

## Condensed balance sheet

[In thousands of EUR]	2024	2023
<b>Fixed assets</b>	<b>952,178</b>	<b>951,888</b>
Intangible fixed assets	0	1
Tangible fixed assets	236	187
Financial fixed assets	951,942	951,700
<b>Current assets</b>	<b>8,287,680</b>	<b>7,806,809</b>
Amounts receivable after more than one year	7,360,869	6,709,125
Stocks and contracts in progress	223,230	190,475
Amounts receivable within one year	464,135	604,219
Cash at bank and in hand	5,942	66,348
Deferred charges and accrued income	233,504	236,642
<b>Total assets</b>	<b>9,239,858</b>	<b>8,758,697</b>
<b>Equity</b>	<b>993,794</b>	<b>993,794</b>
Contributions, other	497,767	497,767

[In thousands of EUR]	2024	2023
Other equity components: reserves, share premiums, retained earnings	496,027	496,027
<b>Provisions for liabilities and charges</b>	<b>121,079</b>	<b>153,342</b>
<b>Amounts payable</b>	<b>8,124,985</b>	<b>7,611,561</b>
Amounts payable after more than one year	7,244,637	6,564,501
Amounts payable within one year	758,607	960,145
Accrued charges and deferred income	121,741	86,915
<b>Total liabilities</b>	<b>9,239,858</b>	<b>8,758,697</b>

## Condensed income statement

[In thousands of EUR]	2024	2023
Turnover	2,718,179	2,360,388
Operating profit (loss)	26,255	20,608
Financial result	-17,283	566,636
Income taxes	-8,972	-8,744
<b>Profit for the period</b>	<b>0</b>	<b>578,500</b>

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# Declaration of the responsible persons

The undersigned declare that, to the best of their knowledge,

- the financial statements of Fluvius System Operator CV and its subsidiaries for the financial year 2024 have been prepared in accordance with the International Financial Reporting Standards (IFRS) accounting standards and present a true and fair view of the equity of the companies in the consolidation scope.
- the Management Review about 2024 presents a true and fair view of the company's developments and results and of the position of the company and its subsidiaries, as well as a description of the major risks and uncertainties they are facing, and
- the 2024 sustainability report has been prepared in accordance with the standards for sustainability reporting and the requirements for EU Taxonomy information.

Melle, 26 March 2025

**Frank VANBRABANT, CEO Fluvius System Operator**

**David TERMONT, CFO Fluvius System Operator**

# Independent auditor's report to the general meeting of Fluvius System Operator CV for the year ended 31 December 2024

In the context of the statutory audit of the Consolidated Financial Statements of Fluvius System Operator CV (the "Company") and its subsidiaries (together the "Group"), we report to you as statutory auditor. This report includes our opinion on the consolidated statement of the financial position as at 31 December 2024, the consolidated statement of profit or loss, the consolidated statement of comprehensive income as at 31 December 2024, the consolidated statement of changes in equity and the consolidated statement of cash flows for the year ended 31 December 2024 and the disclosures including material accounting policy information (all elements together the "Consolidated Financial Statements") as well as our report on other legal and regulatory requirements. These two reports are considered one report and are inseparable.

We have been appointed as statutory auditor by the shareholders' meeting of 24 May 2023, in accordance with the proposition by the Board of Directors following recommendation of the Audit Committee and following recommendation of the workers' council. Our mandate expires at the shareholders' meeting that will deliberate on the Consolidated Financial Statements for the year ending 31 December 2025. We performed the audit of the Consolidated Financial Statements of the Group during 14 consecutive years.

## Report on the audit of the Consolidated Financial Statements

### Unqualified opinion

We have audited the Consolidated Financial Statements of Fluvius System Operator CV, that comprise of the consolidated statement of the financial position as at 31 December 2024, the consolidated statement of profit or loss, the consolidated statement of comprehensive income as at 31 December 2024, the consolidated statement of changes in equity and the consolidated statement of cash flows for the year ended 31 December 2024 and the disclosures including material accounting policy information, which show a consolidated balance sheet total

of € 9.249.461 thousand and of which the consolidated income statement shows a loss for the year of € 12.541 thousand.

In our opinion, the Consolidated Financial Statements give a true and fair view of the consolidated net equity and financial position as at 31 December 2024, and of its consolidated results for the year then ended, prepared in accordance with the IFRS Accounting Standards as adopted by the European Union and with applicable legal and regulatory requirements in Belgium.

### Basis for the unqualified opinion

We conducted our audit in accordance with International Standards on Auditing ("ISA's") applicable in Belgium. In addition, we have applied the ISA's approved by the International Auditing and Assurance Standards Board ("IAASB") that apply at the current year-end date and have not yet been approved at national level. Our responsibilities under those standards are further described in the "Our responsibilities for the audit of the Consolidated Financial Statements" section of our report.

We have complied with all ethical requirements that are relevant to our audit of the Consolidated Financial Statements in Belgium, including those with respect to independence.

We have obtained from the Board of Directors and the officials of the Company the explanations and information necessary for the performance of our audit and we believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### Key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the Consolidated Financial Statements of the current reporting period.

These matters were addressed in the context of our audit of the Consolidated Financial Statements as a whole and in forming our opinion thereon, and consequently we do not provide a separate opinion on these matters.

## Employee benefit liability

### Description of the key audit matter

The employee benefit net liability amounts to € 121.079 thousand as at 31 December 2024. The Group recognizes the provision for the long-term employee benefits based on the requirements of IAS19. The plans of the Group are described in note 23 of the Consolidated Financial Statements.

The valuation of this provision is complex and requires judgments of management. Due to its complexity, the Company is assisted by an external actuary for the calculation of the provision. The valuation of the provision is based on the personnel data included in the pension plans and to which certain actuarial assumptions are applied such as expected inflation, discount rates, projected average salary increases and personnel turnover. A change in these assumptions or the use of incorrect personnel data would have a material impact on the Consolidated Financial Statements. Therefore, the valuation of the employee benefit liability is a key audit matter in our audit.

### Summary of the procedures performed

Our audit procedures included, amongst others:

- An analysis of the existing plans within the Group and discussion with management of potential changes to these plans.
- Testing of the underlying personnel data by means of an analytical review compared to prior year and by a reconciliation (of s.a. gender, salary, age and gender) of a sample of personnel data to underlying documentation.
- Assessing the competence and independence of the external actuary.
- Involving our internal actuarial specialists to assess the appropriateness of the actuarial models used in accordance with IAS19 and to assess the reasonableness of the significant assumptions used to value the provision (expected inflation, discount rates, projected average salary increases, mortality tables and personnel turnover).
- Assessment of the adequacy and completeness of the Group's disclosures in note 23 of the Consolidated Financial Statements.

## Financing activities

### Description of the key audit matter

The balance sheet of the Group is significantly affected by the Group's financing activity. As at 31 December 2024, the long term interest bearing loans and borrowings of the Group amount to € 7.244.636 thousand (78,3% of total equity and liabilities) and the short term interest bearing loans and borrowings to € 276.742 thousand (3% of total equity and liabilities), as described in note 22 of the Consolidated Financial Statements.

These interest bearing loans and borrowings are subsequently used to grant interest bearing loans mainly to the Distribution System Operators ("DSO's"), for a total amount of € 7.223.269 thousand classified as long term receivable and of € 215.231 thousand classified as short term receivable, as described in note 17 of the Consolidated Financial Statements.

Given the magnitude of these amounts compared to total assets respectively total equity and liabilities on the one hand, and the follow-up and the assessment of management regarding the repayment capacity of the DSO's on the other hand, this is considered as a key audit matter for our audit.

### Summary of the procedures performed

We performed following procedures:

- Assessing the accounting treatment of the interest bearing loans and receivables and corresponding transaction costs.
- Reconciling the nominal amounts of the loans with underlying contracts, confirmations and payments.
- Reviewing the long term financing plan for the Group, including those of the Distribution System Operators in order to determine the repayment capacities of the latter based on the underlying long term financing targets of the DSO's as well as discussions with management and those charged with governance.
- Assessing the adequacy and completeness of notes 17 and 22 of the Consolidated Financial Statements.

## Valuation Wyre Holding BV

### Description of the key audit matter

On 1 July 2023, following the implementation of a legal roadmap, the Group and the company Telenet BV contributed their respective cable infrastructure activities to the joint venture company Wyre Holding BV. As a result of this transaction, the Group holds as at 31 December 2024 a 33.2% stake that is accounted for using the equity method. The carrying amount of this stake amounts to € 922.059 thousand in the Consolidated Financial Statements as at 31 December 2024. In accordance with IFRS Accounting Standards, the purchase price of this interest was in 2024 definitively allocated to the fair value of the underlying assets and liabilities acquired by Wyre Holding BV ("Purchase Price Allocation"), as described in note 13 of the Consolidated Financial Statements.

In addition, at least on a yearly basis, an impairment test must be performed on the Group's share in the residual goodwill that is included in the carrying amount of Wyre Holding BV. This impairment test requires estimates and judgements by the management of Wyre Holding BV with regard to

the assumptions used in the discounted cash flow analysis (amongst others the determination of future cash flows as well as the discount rate used), which are complex and subjective in nature.

Changes in these assumptions could thus lead to material changes in the fair value of the goodwill, and to potential impairments if the fair value were to fall below the carrying value.

Considering the underlying assumptions and the complexity of the aforementioned analyses as well as the magnitude of the related effects on the Consolidated Financial Statements, we considered at year-end 2024 the purchase price allocation as well as the annual impairment test with respect to the investment in Wyre Holding BV as a key audit matter for our audit.

### Summary of the procedures performed

- Communication of clear audit instructions to the component auditor of Wyre Holding BV including materiality limits to be applied, specific audit risks and procedures to be carried out in this regard.
- Critical assessment of the audit approach applied by the component auditor in accordance with the applicable international audit standards.
- Review and discussion of the reporting documents provided by the component auditor with a focus on:
  - In particular with regard to the final allocation of the purchase price on 30 June 2024:
    - Critical assessment of the audit approach applied by the component auditor of Wyre Holding BV.
    - Review and discussion of the reporting documents provided by the component auditor regarding their audit procedures on the Purchase Price Allocation.
  - In particular with regard to the impairment test on the residual goodwill as at 31 December 2024, we have verified that the component auditor has performed the following procedures in accordance with our audit instructions:
    - Assessment of the methodology used by Wyre Holding BV management to determine the recoverable value of the investment and related goodwill.
    - Assessment of the reasonableness of the assumptions used by Wyre Holding BV management in the estimation of the recoverable value (with the help of internal specialists where needed).
    - Assessment of the reasonableness of the future cash flows included in the impairment test on the basis of the historical results and the available business plan, and evaluation of the historical accuracy of the estimates made by management of Wyre Holding BV.
    - Verification that future cash flows are based on business plans approved by the Board of Directors of Wyre Holding BV.
    - Testing the mathematical accuracy of the valuation model.
    - Assessment of the sensitivity analysis prepared by Wyre Holding BV management.
- Assessing the adequacy and completeness of note 13 of the Consolidated Financial Statements

## Responsibilities of the Board of Directors for the preparation of the Consolidated Financial Statements

The Board of Directors is responsible for the preparation of the Consolidated Financial Statements that give a true and fair view in accordance with the IFRS Accounting Standards and with applicable legal and regulatory requirements in Belgium and for such internal controls relevant to the preparation of the Consolidated Financial Statements that are free from material misstatement, whether due to fraud or error.

As part of the preparation of Consolidated Financial Statements, the Board of Directors is responsible for assessing the Company's ability to continue as a going concern, and provide, if applicable, information on matters impacting going concern,

The Board of Directors should prepare the financial statements using the going concern basis of accounting, unless the Board of Directors either intends to liquidate the Company or to cease business operations, or has no realistic alternative but to do so.

### Our responsibilities for the audit of the Consolidated Financial Statements

Our objectives are to obtain reasonable assurance whether the Consolidated Financial Statements are free from material misstatement, whether due to fraud or error, and to express an opinion on these Consolidated Financial Statements based on our audit. Reasonable assurance is a high level of assurance, but not a guarantee that an audit conducted in accordance with the ISA's will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these Consolidated Financial Statements.

In performing our audit, we comply with the legal, regulatory and normative framework that applies to the audit of the Consolidated Financial Statements in Belgium. However, a statutory audit does not provide assurance about the future viability of the Company and the Group, nor about the efficiency or effectiveness with which the board of directors has taken or will undertake the Company's and the Group's business operations. Our responsibilities with regards to the going concern assumption used by the board of directors are described below.

As part of an audit in accordance with ISA's, we exercise professional judgment and we maintain professional skepticism throughout the audit. We also perform the following tasks:

- identification and assessment of the risks of material misstatement of the Consolidated Financial Statements, whether due to fraud or error, the planning and execution of audit procedures to respond to these risks and obtain audit evidence which is sufficient and appropriate to provide a basis for our opinion.

The risk of not detecting material misstatements resulting from fraud is higher than when such misstatements result from errors, since fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;

- obtaining insight in the system of internal controls that are relevant for the audit and with the objective to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control;
- evaluating the selected and applied accounting policies, and evaluating the reasonability of the accounting estimates and related disclosures made by the Board of Directors as well as the underlying information given by the Board of Directors;
- conclude on the appropriateness of the Board of Directors' use of the going-concern basis of accounting, and based on the audit evidence obtained, whether or not a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's or Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the Consolidated Financial Statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on audit evidence obtained up to the date of the auditor's report. However, future events or conditions may cause the Company to cease to continue as a going-concern;
- evaluating the overall presentation, structure and content of the Consolidated Financial Statements, and evaluating whether the Consolidated Financial Statements reflect a true and fair view of the underlying transactions and events.

We communicate with the Audit Committee within the Board of Directors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Because we are ultimately responsible for the opinion, we are also responsible for directing, supervising and performing the audits of the subsidiaries. In this respect we have determined the nature and extent of the audit procedures to be carried out for group entities.

We provide the Audit Committee within the Board of Directors with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with the Audit Committee within the Board of Directors, we determine those matters that were of most significance in the audit of the Consolidated Financial Statements of the current period and are therefore the key audit matters. We describe these matters in our report, unless the law or regulations prohibit this.

## Report on other legal and regulatory requirements

### Responsibilities of the Board of Directors

The Board of Directors is responsible for the preparation and the content of the Board of Directors' report on the Consolidated Financial Statements, and other information included in the annual report.

### Responsibilities of the auditor

In the context of our mandate and in accordance with the additional standard to the ISA's applicable in Belgium, it is our responsibility to verify, in all material respects, the Board of Directors' report on the Consolidated Financial Statements, and other information included in the annual report, as well as to report on these matters.

### Aspects relating to Board of Directors' report and other information included in the annual report

The Board of Directors' report on the Consolidated Financial Statements contains the consolidated sustainability information that is subject to our separate limited assurance report. This section does not cover the assurance on the consolidated sustainability information included in the annual report.

In our opinion, after carrying out specific procedures on the Board of Directors' report, the Board of Directors' report is consistent with the Consolidated Financial Statements and has been prepared in accordance with article 3:32 of the Code of companies and associations.

In the context of our audit of the Consolidated Financial Statements, we are also responsible to consider whether, based on the information that we became aware of during the performance of our audit, the Board of Directors' report and other information included in the annual report, being:

- Information concerning the parent company

contain any material inconsistencies or contains information that is inaccurate or otherwise misleading. In light of the work performed, there are no material inconsistencies to be reported.

### Independence matters

Our audit firm and our network have not performed any services that are not compatible with the audit of the Consolidated Financial Statements and have remained independent of the Company during the course of our mandate.

The fees related to additional services which are compatible with the audit of the Consolidated Financial Statements as referred to in article 3:65 of the Code of companies and associations were duly itemized and valued in the notes to the Consolidated Financial Statements.

### European single electronic format ["ESEF"]

In accordance with the standard on the audit of the conformity of the financial statements with the European single electronic format (hereinafter "ESEF"), we have carried out the audit of the compliance of the ESEF format with the regulatory technical standards set by the European Delegated Regulation No 2019/815 of 17 December 2018 (hereinafter: "Delegated Regulation").

The board of directors is responsible for the preparation, in accordance with the ESEF requirements, of the consolidated financial statements in the form of an electronic file in ESEF format (hereinafter 'the digital consolidated financial statements') included in the annual financial report available on the portal of the FSMA (<https://www.fsma.be/en/stori>).

It is our responsibility to obtain sufficient and appropriate supporting evidence to conclude that the format and markup language of the digital consolidated financial statements comply in all material respects with the ESEF requirements under the Delegated Regulation.

Based on the work performed by us, we conclude that the format and tagging of information in the digital consolidated financial statements of Fluvius System Operator CV per 31 December 2024 included in the annual financial report available on the portal of the FSMA (<https://www.fsma.be/en/stori>) are, in all material respects, in accordance with the ESEF requirements under the Delegated Regulation.

### Other communications

- This report is consistent with our supplementary declaration to the Audit Committee as specified in article 11 of the regulation (EU) nr. 537/2014.

Ghent, 28 March 2025

EY Bedrijfsrevisoren BV  
Statutory auditor  
Represented by

Marnix Van Dooren \*  
Partner  
\*Acting on behalf of a BV/SRL

25MVD0111

# Annex

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# GRI Content Index

The tables below report on financial year 2024 with reference to the [GRI standards \(version 2021\)](#), issued by the [Global Reporting Initiative \(GRI\)](#). They form an integral part of this annual report.

The GRI defines three series of standards:

1. Universal Standards, used for [GRI 2: General Disclosures](#) and [GRI 3: Material Topics](#) ;
2. Sector Standards, none of which apply to Fluvius ;
3. Topic Standards, starting from GRI 201, used for [GRI Economic Topic Standards](#) (nrs. 2xx), [GRI Environmental Topic Standards](#) (nrs. 3xx) and [GRI Social Topic Standards](#) (nrs. 4xx).

The GRI Content Index for financial year 2024 refers to information in the annual report following CSRD/ESRS definitions. Therefore, it possibly does not align exactly with the information on financial years 2022 and 2023, which was copied from the respective annual reports.

## GRI 2: General Disclosures

Code	Description	2022	2023	2024
2-1	Organizational details	-	-	Fluvius, close to you [see pages 10-10]
a.	Names	Fluvius System Operator, sometimes abbreviated to Fluvius SO, and commonly known as Fluvius.		
b.	Legal form	Cooperative society - 100% of the share capital in each of eleven intermunicipal, mission entrusted associations is held by the Flemish cities and municipalities.		
				Working for our shareholders, the mandated associations [see pages 11-11]
				On Jan. 1st, 2025 these eleven mission entrusted associations were restructured into nine. Also refer to Structural changes as from 1 January 2025 [see pages 56-57].
c.	Headquarters	Brusselsesteenweg 199, B-9090 Melle (Belgium)		
d.	Countries of operation	Fluvius operates only in Belgium, in the region of Flanders, in all Flemish cities and municipalities.		
2-2	Entities included in the organization's sustainability reporting	Fluvius System Operator is the consolidating entity. Are being consolidated: De Stroomlijn, Atrias, Synductis. They are not included in the CSR reporting.	Starting July 1st, 2023, Wyre Holding is included in the consolidation scope [applying equity method, participation of 33.20%].	General basis for preparation of sustainability statements (BP-1) [see pages 64-64]
2-3	Reporting period, frequency and contact point	-	-	General basis for preparation of sustainability statements (BP-1) [see pages 64-64]
a.	Reporting period sustainability report	01.01-31.12.2022 per calendar year	01.01-31.12.2023 per calendar year	01.01-31.12.2024 per calendar year
b.	Reporting period financial report	Equal to sustainability report	Equal to sustainability report	Equal to sustainability report
c.	Publication date	31.3.2023	31.3.2024	31.3.2025
d.	Contact for questions	e-mail: <a href="mailto:investors@fluvius.be">investors@fluvius.be</a>	e-mail: <a href="mailto:investors@fluvius.be">investors@fluvius.be</a>	e-mail: <a href="mailto:investors@fluvius.be">investors@fluvius.be</a>
2-4	Restatements of information	None	None	Corrections in previous reporting periods [see pages 66-66]
2-5	External assurance	Assurance by the external auditor on the presence of the non-financial information, as imposed by the law of September 3rd, 2017. The auditor's findings are included in the Auditor's Report.		
				Assurance of non-financial disclosures by the external auditor, as imposed by the <a href="#">Wet betreffende de openbaarmaking van duurzaamheidsinformatie en de assurance ervan d.d. 2.12.2024</a> .
				Conclusions are reported in the Independent auditor's report to the general meeting of Fluvius System Operator CV for the year ended 31 December 2024 [see pages 386-390].

Code	Description	2022	2023	2024
2-6	Activities, value chain and other business relationships			
a.	Sector of activity	Distribution of electricity and gas; sewerage; cable TV infrastructure (until June 30th, 2023); data management; district heating; public lighting		<a href="#">Business model (see pages 76-78)</a>
		Supply of electricity and gas to specific customer groups, fulfilling specific public service obligations.		
b.	Value chain	Our customers are households, SMEs, large enterprises and public authorities, exclusively within the Flemish Region.		<a href="#">Value chain (see pages 89-90)</a>
		Fluvius integrates sustainability and CSR criteria in its terms of reference as exclusion and awarding criteria. Fluvius has joined the Ecovadis platform to better and more deeply integrate sustainability criteria into its supply chain.		
i.	Scale of activities (IFRS figures):			
	Revenues (k€)	2,011,644	2,505,752	2,718,535
	Balance sheet total (k€)	6,889,767	8,778,893	9,249,461
	Equity (k€)	1,617	1,002,482	964,448
ii.	Supply chain	-	-	<a href="#">Our upstream chain (inputs) (see pages 89-90)</a>
c.	Relevant business relationships	-	-	No other relevant business relationships than reported above.
d.	Significant changes	None	On July 1st, 2023, Fluvius transferred the activity 'cable TV infrastructure' to Wyre. In exchange, Fluvius received a financial participation of 33.20% in the capital of Wyre Holding (100% owner of Wyre).	<a href="#">Major evolutions and events at Fluvius (see pages 39-45)</a>

Code	Description	2022	2023	2024
2-7	Employees:	-	-	Characteristics of Fluvius employees [S1-6] [see pages 232-232]
a.	Employees	4,770	5,042	
	(incl. Fluvius OV)	5,422	5,667	
	Men	3,351	3,467	
	Women	1,419	1,575	
b.				
i.	Permanent employees	4,576	4,815	
ii.	Temporary employees	182	218	
iii.	Non-guaranteed hours employees	None	None	
iv.	Full-time employees	3,828	4,097	
v.	Part-time employees	942	945	
	- Apprenticeship contracts	12	9	
2-8	Workers who are not employees	Fluvius engages other companies for part of its activities, in the form of service contracts with agreed service levels. These companies deploy the necessary employees, but their numbers are not required or known by Fluvius. These employees are not managed by Fluvius.		Characteristics of non-employee workers in the undertaking's own workforce [S1-7] [see pages 233-233]
2-9	Governance structure and composition	<p>All shareholders are represented in the General Assembly. The highest governing body is the Board of Directors. The Board is assisted by the Audit Committee, the HR Committee and the Strategic Committee.</p> <p>Day-to-day management of the company is entrusted to the Management Committee.</p> <p>On specific CSR topics, the Management Committee is assisted by the internal CSR Board.</p>		Composition of governing bodies and management [see pages 21-28]
2-10	Nomination and selection of the highest governance body	The General Assembly appoints the members of the Board of Directors on nomination by the shareholders. A compulsory rule of 2/3-1/3 is applied on gender diversity of the directors.		
2-11	Chair of the highest governance body	The Chair of the Board of Directors and the Chief Executive Officer are separate functions.		

Code	Description	2022	2023	2024
2-12	Role of the highest governance body in overseeing the management of impacts	<p>The Board of Directors establishes the mission, vision, strategy and the performance indicators. Management is to implement these.</p> <p>See the materiality and urgency analysis based on a stakeholder dialogue (end of 2018, partly repeated in 2020)</p> <p>Risk management is part of the integral risk management monitored by the Board of Directors and the Audit Committee. Fluvius has its own independent Internal Audit Department, which reports its findings and recommendations directly to the CEO and the Audit Committee/Board of Directors.</p>	<p>In 2023 a <a href="#">double materiality analysis (DMA)</a> was performed, in collaboration with relevant stakeholders and compliant with requirements from the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standard (ESRS). This DMA was approved by the CSR-board on Aug. 30th. It was presented to the Management Committee and the Board of Directors on Nov. 21st and 22nd respectively.</p>	<p>The role of the governing, management and supervisory bodies (GOV-1) [see pages 68-68]</p> <p><a href="#">Information provided to and sustainability matters addressed by the undertaking's governing, management and supervisory bodies (GOV-2)</a> [see pages 69-69]</p>
2-13	Delegation of responsibility for managing impacts	<p>Sustainability policy is part of the general operational duty of the management; the CSR Board coordinates and advises the CSR and sustainability policies.</p> <p>A dedicated CSR coordinator has been appointed. The general responsibility is with the Management Committee.</p> <p>The CSR Board is chaired by the Secretary-General (member of the Management Committee).</p>	<p>The CSR Board is chaired by the head of Corporate Finance, reporting to the CFO.</p>	<p>The role of the governing, management and supervisory bodies (GOV-1) [see pages 68-68]</p> <p><a href="#">Information provided to and sustainability matters addressed by the undertaking's governing, management and supervisory bodies (GOV-2)</a> [see pages 69-69]</p>
2-14	Role of the highest governance body in sustainability reporting	<p>The Board of Directors - on proposal of the Management Committee - approves the annual Activity Report/CSR Report.</p>		<p><a href="#">Risk management and internal controls over sustainability reporting (GOV-5)</a> [see pages 72-72]</p>
2-15	Conflicts of interest	<p>The <a href="#">Corporate Governance Charter</a> (only available in Dutch) includes relevant stipulations. The energy regulator, as an external party, is monitoring closely and permanently.</p>		

Code	Description	2022	2023	2024
2-16	Communication of critical concerns to highest governance body			
a.	Procedure	The Management Committee reports to the Audit Committee and the Board of Directors.		Information provided to and sustainability matters addressed by the undertaking's governing, management and supervisory bodies [GOV-2] [see pages 69-69]  Whistleblowing channels [see pages 306-307]  Prevention and detection of corruption and bribery [G1-3] [see pages 312-313]
b.	Number and nature of critical concerns communicated	No critical concerns were signalled to the Board of Directors during the reporting period.		Confirmed incidents of corruption or bribery [G1-4] [see pages 314-314]
2-17	Collective knowledge of the highest governance body		After the complete renewal of the Board of Directors, following the municipal elections every 6 years, the directors receive an extensive training.	The role of the governing, management and supervisory bodies [GOV-1] [see pages 68-68]  The role of the governing, management and supervisory bodies [G1.GOV-1] [see pages 302-303]
2-18	Evaluation of the performance of the highest governance body	No formal evaluation takes place.	No formal evaluation takes place.	No formal evaluation takes place.
2-19	Remuneration policies			
a.	Description	See Remuneration Report in the Report by the Board of Directors.		For the Board of Directors, refer to Remuneration Report [see pages 29-31].  For the Managementcommittee, refer to Management Committee [see pages 31-31] and Integration of sustainability-related performance in incentive schemes [GOV-3] [see pages 70-70]
b.	... and link with sustainability performance	Variable remuneration for Management Committee members is based on a number of LT KPIs.		For the Managementcommittee, refer to Management Committee [see pages 31-31] and Integration of sustainability-related performance in incentive schemes [GOV-3] [see pages 70-70]
2-20	Process to determine remuneration	The general remuneration policy is based on sectoral collective bargaining agreements, with annual detailed reporting to the HR Committee. Collective Bargaining Agreement 90 for executive staff and employees allows for a bonus on condition that some predefined targets are met.  No other stakeholders are involved in remuneration policies.		Integration of sustainability-related performance in incentive schemes [GOV-3] [see pages 70-70]

Code	Description	2022	2023	2024
2-21	Annual total compensation ratio	Data not available	Data not available	Compensation metrics (pay gap and total compensation) [S1-16] (see pages 242-242)
2-22	Statement on sustainable development strategy	See Preface by the Chairman of the Board in respective annual reports.		<p>Wim Dries, Chairman of the Board of Directors (see pages 3-3)</p> <p>Frank Vanbrabant, CEO Fluvius (see pages 4-4)</p> <p>Statement on due diligence [GOV-4] (see pages 71-71)</p> <p>Strategy (see pages 74-75)</p> <p>Strategic commitments (see pages 75-75)</p>
2-23	Policy commitments			
a.	... for responsible business conduct	Mission, vision, strategy and values are laid down in documents. Norms of behaviour are included in the Corporate Governance Charter and the Ethical Charter, both updated in June 2021.	Additionally the Code of Conduct for suppliers was published in December 2023.	<p>Statement on due diligence [GOV-4] (see pages 71-71)</p> <p>Policies adopted to manage material sustainability matters [MDR-P] (see pages 102-102), further referring to</p> <ul style="list-style-type: none"> <li>• Policies related to own workforce [S1-1] (see pages 211-224),</li> <li>• Policies related to value chain workers [S2-1] (see pages 247-252),</li> <li>• Policies related to affected communities [S3-1] (see pages 261-262),</li> <li>• Policies related to consumers and end-users [S4-1] (see pages 270-271) and</li> <li>• Corporate culture and business conduct policies [G1-1] (see pages 305-307).</li> </ul>
b.	... to respect human rights	-	-	<p>Statement on due diligence [GOV-4] (see pages 71-71)</p> <p>Minimum safeguards (see pages 116-117)</p> <p>Human rights (see pages 213-213)</p> <p>Human rights policy (see pages 249-250)</p> <p>General policy (see pages 261-261)</p> <p>Human rights policy (see pages 271-271)</p>

Code	Description	2022	2023	2024
2-24	Embedding policy commitments	Policy commitments (strategic commitments) are assigned to a responsible person (member of MC or senior manager) for implementation by project or regular organisation, and monitored by three strategic steering committees for respective domains Net&System, Customer&Marketplace and Corporate&Employee.		<p>Actions and resources in relation to material sustainability matters (MDR-A) (see pages 103-103), further referring to</p> <ul style="list-style-type: none"> <li>• Actions linked to material impact, and approaches to manage risks and opportunities, and the effectiveness of those actions (S1-4) (see pages 230-230),</li> <li>• Acteren op materiële impacts op werknemers in de waardeketen, beheersen van hun materiële risico's, benutten van hun materiële kansen, en de effectiviteit van die maatregelen (S2-4) (see pages 255-256),</li> <li>• Acteren op materiële impacts op getroffen gemeenschappen, beheersen van hun materiële risico's, benutten van hun materiële kansen, en de effectiviteit van die maatregelen (S3-4) (see pages 265-265),</li> <li>• Acteren op materiële impacts op consumenten en eindgebruikers, beheersen van hun materiële risico's, benutten van hun materiële kansen, en de effectiviteit van die maatregelen (S4-4) (see pages 275-275) and</li> <li>• Corporate culture and business conduct policies (G1-1) (see pages 305-307).</li> </ul>
2-25	Processes to remediate negative impacts	Complaints can be registered at the Fluvius customer contact center or the Flemish ombudsperson service for energy. Complaints are treated to satisfaction in 1st line, or escalated to an independent 2nd line.		<p>Policies related to own workforce (S1-1) (see pages 211-224)</p> <p>Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3) (see pages 229-229)</p> <p>Policies related to value chain workers (S2-1) (see pages 247-252)</p> <p>Processes to remediate negative impacts and channels for value chain workers to raise concerns (S2-3) (see pages 254-254)</p> <p>Acteren op materiële impacts op werknemers in de waardeketen, beheersen van hun materiële risico's, benutten van hun materiële kansen, en de effectiviteit van die maatregelen (S2-4) (see pages 255-256)</p> <p>Policies related to affected communities (S3-1) (see pages 261-262)</p>



Code	Description	2022	2023	2024
2-25	Processes to remediate negative impacts (continued from previous page)			<p>Processes to remediate negative impacts and channels for affected communities to raise concerns [S3-3] (see pages 264-264)</p> <p>Acteren op materiële impacts op getroffen gemeenschappen, beheersen van hun materiële risico's, benutten van hun materiële kansen, en de effectiviteit van die maatregelen [S3-4] (see pages 265-265)</p> <p>Policies related to consumers and end-users [S4-1] (see pages 270-271)</p> <p>Processes to remediate negative impacts and channels for consumers and end-users to raise concerns [S4-3] (see pages 274-274)</p> <p>Acteren op materiële impacts op consumenten en eindgebruikers, beheersen van hun materiële risico's, benutten van hun materiële kansen, en de effectiviteit van die maatregelen [S4-4] (see pages 275-275)</p>
2-26	Mechanisms for seeking advice and raising concerns		The Ethical Charter is used as a guide for ethical behaviour. Unethical behaviour can be signalled. Art. 25 of the Labour regulation guarantees an independent and objective treatment of reported infringements. A whistleblower procedure and deontological team for handling reports was established as part of the implementation of the new Ethical Charter in 2021.	<p>Processes to remediate negative impacts and channels for own workers to raise concerns [S1-3] (see pages 229-229)</p> <p>Processes to remediate negative impacts and channels for value chain workers to raise concerns [S2-3] (see pages 254-254)</p> <p>Processes to remediate negative impacts and channels for affected communities to raise concerns [S3-3] (see pages 264-264)</p> <p>Processes to remediate negative impacts and channels for consumers and end-users to raise concerns [S4-3] (see pages 274-274)</p> <p>Corporate culture and business conduct policies [G1-1] (see pages 305-307)</p> <p>Prevention and detection of corruption and bribery [G1-3] (see pages 312-313)</p>

Code	Description	2022	2023	2024
2-27	Compliance with laws and regulations	12 environment-related incidents reported.	12 environment-related incidents reported.	11 environment-related incidents reported. Also refer to <a href="#">Pollution of air, water and soil (E2-4)</a> [see pages 178-178].  Incidents, complaints and severe human rights impacts [S1-17] [see pages 243-243]  Confirmed incidents of corruption or bribery [G1-4] [see pages 314-314]
2-28	Membership associations	Fluvius is a member of a.o. <ol style="list-style-type: none"> <li>1. the federal sector organisation Synergrid,</li> <li>2. E.DSO, the European association of distribution grid operators,</li> <li>3. The Shift, Belgian network for the transition towards a sustainable society and economy,</li> <li>4. Voka, Flemish network of enterprises.</li> </ol>		
2-29	Approach to stakeholder engagement	Identification and selection of stakeholders took place prior to the materiality analysis.  The stakeholder inquiry (end of 2018) was an online questionnaire.	In 2023 a <a href="#">Double materiality analysis (DMA)</a> was performed, in collaboration with relevant stakeholders and compliant with requirements from the CSRD/ESRS. This DMA was approved by the CSR-board on Aug. 30th. It was presented to the Management Committee and the Board of Directors on Nov. 21st and 22nd respectively.	Interests and views of stakeholders [SBM-2] [see pages 91-92]  Processes for engaging with own workers and workers' representatives about impacts [S1-2] [see pages 225-228]  Processes for engaging with value chain workers about impacts [S2-2] [see pages 253-253]  Processes for engaging with affected communities about impacts [S3-2] [see pages 263-263]  Processes for engaging with consumers and end-users about impacts [S4-2] [see pages 272-273]
2-30	Collective bargaining agreements	100% of employees are covered by collective bargaining agreements.		Collective bargaining coverage and social dialogue [S1-8] [see pages 234-234]

## GRI 3: Material Topics

Code	Description	2022	2023	2024
3-1	Process to determine material topics	The selection and definition of topics are primarily determined by the corporate strategy laid out and the elements indicated by the materiality analysis.	Material topics were defined through the DMA, as required by CSRD/ESRS. The procedure is documented in the final report of the <a href="#">Double materiality analysis (DMA)</a> . The full report <a href="#">Dubbele Materialiteitsanalyse 2023</a> is only available in Dutch.	<a href="#">Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1)</a> (see pages 96-100)
3-2	List of material topics			
a.	List	Identification and selection of material topics was the object of the materiality analysis (2018).	The <a href="#">Double materiality analysis (DMA)</a> concluded all ESRS-topics as material, except for E4 Biodiversity and ecosystems. Additionally two entity-specific topics proved material: <ul style="list-style-type: none"> <li>• ES1 Grid reliability</li> <li>• ES2 Smart infrastructure and data</li> </ul>	<a href="#">Results of the double materiality analysis</a> (see pages 93-93)
b.	Changes compared to previous reporting period	None	Materiality analysis conducted in two directions, both outgoing impacts and incoming risks and opportunities, as required by the CSRD/ESRS.	<a href="#">Changes to the process and future iterations</a> (see pages 100-100)

Code	Description	2022	2023	2024
3-3	Management of material topics	A materiality analysis was performed in 2018 by Sustainalize. A double materiality analysis is planned in 2023, in order to comply with the Corporate Sustainability Reporting Directive.	The DMA will be reviewed periodically, as required by the CSRD/ESRS.	Impact, risk and opportunity management (IRO) [see pages 95-103]
a.	Impacts of material topics			Material impacts [see pages 93-93]
b.	Location of material topics in value chain			Results of the double materiality analysis [see pages 93-93]
c.	Policies regarding material topics			Policies adopted to manage material sustainability matters (MDR-P) [see pages 102-102]
d.	Actions to manage material topics			Actions and resources in relation to material sustainability matters (MDR-A) [see pages 103-103]
e.	Tracking and targets for material topics			Metrics in relation to material sustainability matters (MDR-M) [see pages 105-105]
f.	Stakeholder engagement on actions and their effectiveness			Tracking effectiveness of policies and actions through targets (MDR-T) [see pages 106-106]
				Interests and views of stakeholders (SBM-2) [see pages 91-92]

## GRI Economic Topic Standards

Code	Description	2022	2023	2024
<b>201</b>	<b>Economic performance</b>			
201-1	Direct economic value generated and distributed (IFRS figures):			
	Turnover (k€)	2,011,644	2,505,752	2,718,535
	Materials & services	1.34 billion €	1.73 billion €	2.05 billion €
	Wages	646 million €	657 million €	710 million €
	Financial costs	124 million €	191 million €	213 million €
201-2	Financial implications and other risks and opportunities due to climate change	Fluvius has decided in principle to fully align the investment policy of the Fluvius Economic Group with the Flemish Energy & Climate Plan.		Financial impacts of material risks and opportunities [see pages 94-94]  Actions and resources in relation to climate change policies (E1-3) [see pages 153-157]
201-3	Defined benefit plan obligations and other retirement plans	-	-	2.3.10 Employee benefit liability [see pages 336-337]  Employee benefit expenses [see pages 343-343]  Employee benefit liabilities [see pages 363-370]
201-4	Financial assistance received from government	No financially material assistance. Fluvius operates in a regulated context.		
a.	Total monetary value	No financially material assistance. Fluvius operates in a regulated context.		
b.	by country	Not applicable	Not applicable	Not applicable
c.	Government presence in shareholding structure	100% of the share capital in each of 11 intermunicipal, mission entrusted associations is held by the Flemish cities and municipalities.  Also refer to <a href="#">Working for our shareholders, the mandated associations</a> (see pages 11-11) and <a href="#">Structural changes as from 1 January 2025</a> (see pages 56-57).		
<b>202</b>	<b>Labour market presence</b>			
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	Data not available	Data not available	Adequate wages (S1-10) [see pages 236-236]
202-2	Proportion of senior management hired from the local community	100% from Flemish Region	100% from Flemish Region	100% from Flemish Region

Code	Description	2022	2023	2024
<b>203</b>	<b>Indirect economic impacts</b>			
203-1	Infrastructure investments and services supported	The company invests on behalf of its shareholders in maintenance, development, safety and reliability of the grid infrastructure for several utility services.		Our networks (see pages 78-89)
	Gross investments in infrastructure and related items	1,198.2 million €	1,411.6 million €	1,704.5 million €
203-2	Significant indirect economic impacts	Fluvius' value propositions describe how and in which areas the company wants to bring about a positive impact on Flemish society. The Flemish local authorities are being supported by Fluvius in their efforts towards energy savings, energy efficiency and realizing their climate objectives.		Investments (see pages 143-145)  Actions linked to material impact, and approaches to manage risks and opportunities, and the effectiveness of those actions (S1-4) (see pages 230-230)  Acteren op materiële impacts op werknemers in de waardeketen, beheersen van hun materiële risico's, benutten van hun materiële kansen, en de effectiviteit van die maatregelen (S2-4) (see pages 255-256)  Acteren op materiële impacts op getroffen gemeenschappen, beheersen van hun materiële risico's, benutten van hun materiële kansen, en de effectiviteit van die maatregelen (S3-4) (see pages 265-265)
<b>204</b>	<b>Procurement Practices</b>			
3-3	Management of material topics	-	-	Management of relationships with suppliers (G1-2) (see pages 308-311)
204-1	Proportion of spending on local suppliers	Data not available	Data not available	Data not available
<b>205</b>	<b>Anti-corruption</b>			
3-3	Management of material topics	-	-	Corporate culture and business conduct policies (G1-1) (see pages 305-307)  Prevention and detection of corruption and bribery (G1-3) (see pages 312-313)
205-1	Operations assessed for risks related to corruption	100%, through the terms of reference in procurement procedures		Prevention and detection of corruption and bribery (G1-3) (see pages 312-313)

Code	Description	2022	2023	2024
205-2	Communication and training about anti-corruption policies and procedures	The Ethical Charter was introduced to all employees. The Purchasing Dept. offers specific training for its employees.	Explanations to the Ethical Charter were distributed among employees, with dialogue starters supporting discussions in teams.	Prevention and detection of corruption and bribery (G1-3) [see pages 312-313]  Also refer to <a href="#">Governance-documenten   Fluvius</a> .
205-3	Confirmed incidents of corruption and actions taken	No known cases	No known cases	Confirmed incidents of corruption or bribery (G1-4) [see pages 314-314]
<b>206</b>	<b>Anti-competitive Behavior</b>			
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	None	None	None
<b>207</b>	<b>Tax</b>			
207-1	Approach to tax	-	-	Taxation [see pages 116-116]
207-2	Tax governance, control, and risk management			
a.	Description of framework	-	-	Taxation [see pages 116-116]
b.	Reporting unethical or unlawful behavior	-	-	Whistleblowing channels [see pages 306-307]
c.	External assurance	Assurance by the external auditor on the presence of the non-financial information, as imposed by the law of September 3rd, 2017. The auditor's findings are included in the Auditor's Report.		Assurance of non-financial disclosures by the external auditor, as imposed by the <a href="#">Wet betreffende de openbaarmaking van duurzaamheidsinformatie en de assurance ervan d.d. 2.12.2024</a> .  Conclusions are reported in the independent auditor's report to the general meeting of Fluvius System Operator CV for the year ended 31 December 2024 [see pages 386-390].
207-3	Stakeholder engagement and management of concerns related to tax	-	-	Interests and views of stakeholders (SBM-2) [see pages 91-92]

## GRI Environmental Topic Standards

Code	Description	2022	2023	2024
<b>301</b>	<b>Materials</b>			
3-3	Management of material topics	-	-	<p>Policies related to resource use and circular economy [E5-1] (see pages 195-195)</p> <p>Actions and resources related to resource use and circular economy [E5-2] (see pages 196-198)</p> <p>Targets related to resource use and circular economy [E5-3] (see pages 199-199)</p>
301-1	Materials used by weight or volume	Data not available	Data not available	Resource inflows [E5-4] (see pages 200-201)
301-2	Recycled materials used	Data not available	Data not available	Resource outflows [E5-5] (see pages 202-204)
301-3	Reclaimed products and their packaging materials	Data not available	Data not available	Data not available
<b>302</b>	<b>Energy</b>			
3-3	Management of material topics	-	-	<p>Policies related to climate change mitigation and adaptation [E1-2] (see pages 148-152)</p> <p>Actions and resources in relation to climate change policies [E1-3] (see pages 153-157)</p> <p>Targets related to climate change mitigation and adaptation [E1-4] (see pages 158-158)</p>
302-1	Energy consumption within the organisation	4,457 TJ	Data not available	Energy consumption and mix [E1-5] (see pages 159-159)
302-2	Energy consumption outside of the organisation	Data not available	Data not available	Data not available
302-3	Energy intensity	Data not available	Data not available	Energy consumption and mix [E1-5] (see pages 159-159)
302-4	Reduction of energy consumption	Due to the merger into Fluvius and as a consequence of different methods of measuring at the former companies, no reliable data are available at this moment.		Energy consumption and mix [E1-5] (see pages 159-159)
302-5	Reductions in energy requirements of products and services	Disclosure not applicable. Fluvius only delivers services. Customers do not consume energy using these services..		



Code	Description	2022	2023	2024
<b>303</b>	<b>Water and effluents</b>			
3-3	Management of material topics	-	-	<p>Policies related to pollution (E2-1) (see pages 168-173)</p> <p>Actions and resources related to pollution (E2-2) (see pages 174-176)</p> <p>Targets related to pollution (E2-3) (see pages 177-177)</p> <p>Policies related to water (E3-1) (see pages 181-186)</p> <p>Actions and resources related to water (E3-2) (see pages 187-190)</p> <p>Targets related to water (E3-3) (see pages 191-191)</p>
303-1	Interactions with water as a shared resource	Fluvius uses tapwater for regular consumption by employees in its offices, and does not withdraw surface or groundwater.		Ambitions water in future-oriented buildings (see pages 191-191)
303-2	Management of water discharge-related impacts	Fluvius only discharges sanitary wastewater from the normal use of employees working in offices, and only into sewers.		
303-3	Water withdrawal	Fluvius uses tapwater for regular consumption by employees in its offices, and does not withdraw surface or groundwater.		Ambitions water in future-oriented buildings (see pages 191-191)
303-4	Water discharge	Fluvius only discharges sanitary wastewater from the normal use of employees working in offices, and only into sewers.		
303-5	Water consumption	Data not available	Data not available	Water consumption (E3-4) (see pages 192-192)
<b>304</b>	<b>Biodiversity</b>			
3-3	Management of material topics	-	-	Biodiversity and ecosystems not material (see pages 101-101)
304-1	Operational sites owned, leases, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Fluvius has no operational sites in or adjacent to these areas.	Fluvius has no operational sites in or adjacent to these areas.	Fluvius has no operational sites in or adjacent to these areas.
304-2	Significant impacts of activities, products, and services on biodiversity	Public lighting may have an impact on nocturnal fauna. Fluvius investigates new technology to reduce this impact to a minimum. The general roll-out of led in public lighting creates more opportunities for dimming and active switching-off, positively impacting surroundings.	The <a href="#">Double materiality analysis (DMA)</a> concluded Fluvius' impact on biodiversity as not material. Any construction of infrastructure in or near protected areas or areas of high biodiversity value is preceded by a relevant analysis. When necessary, additional measures are implemented.	

Code	Description	2022	2023	2024
304-3	Habitats protected or restored	None	None	None
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	None	None	None
<b>305</b>	<b>Emissions</b>			
3-3	Management of material topics and GRI 305 1.2 Offsets	-	-	<p>Policies related to climate change mitigation and adaptation [E1-2] [see pages 148-152]</p> <p>Actions and resources in relation to climate change policies [E1-3] [see pages 153-157]</p> <p>Targets related to climate change mitigation and adaptation [E1-4] [see pages 158-158]</p> <p>GHG removals and GHG mitigation projects financed through carbon credits [E1-7] &amp; Internal carbon pricing [E1-8] [see pages 165-165]</p> <p>Policies related to pollution [E2-1] [see pages 168-173]</p> <p>Actions and resources related to pollution [E2-2] [see pages 174-176]</p> <p>Targets related to pollution [E2-3] [see pages 177-177]</p>
305-1	Direct [scope 1] GHG emissions [tCO <sub>2</sub> -eq]	-	94,783	94,974
			Also refer to <a href="#">Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]</a> [see pages 160-164].	
305-2	Energy indirect [scope 2] GHG emissions [tCO <sub>2</sub> -eq]			
	Location-based	-	212,886	217,048
	Market-based	-	210,271	214,286
			Also refer to <a href="#">Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]</a> [see pages 160-164].	
305-3	Other indirect [scope 3] GHG emissions [tCO <sub>2</sub> -eq]	Data not available	991,917	1,082,400
			2023 is the base year for scope 3 emissions. Also refer to <a href="#">Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]</a> [see pages 160-164].	
305-4	GHG emissions intensity	Data not available	Data not available	Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6] [see pages 160-164]

Code	Description	2022	2023	2024
305-5	Reduction of GHG emissions	Data not available	Data not available	<p>Actions and resources in relation to climate change policies [E1-3] (see pages 153-157)</p> <p>Targets related to climate change mitigation and adaptation [E1-4] (see pages 158-158)</p> <p>GHG removals and GHG mitigation projects financed through carbon credits [E1-7] &amp; Internal carbon pricing [E1-8] (see pages 165-165)</p>
305-6	Emissions of ozone-depleting substances (ODS)	Pollution of air, water and soil [E2-4] (see pages 178-178)		
305-7	NOx, SOx and other significant air emissions	Pollution of air, water and soil [E2-4] (see pages 178-178)		
<b>306</b>	<b>Waste</b>			
3-3	Management of material topics	-	-	<p>Policies related to resource use and circular economy [E5-1] (see pages 195-195)</p> <p>Actions and resources related to resource use and circular economy [E5-2] (see pages 196-198)</p> <p>Targets related to resource use and circular economy [E5-3] (see pages 199-199)</p>
306-1	Waste generation and significant waste-related impacts	Fluvius maximises the use of separate waste streams and recycling.		
306-2	Management of significant waste-related impacts	<p>Fluvius actively raises awareness for correct waste management with employees and subcontractors, by regularly inspecting waste streams and reporting on them.</p> <p>Excavated soil is analysed, cleaned if necessary and then reused by certified companies, known by their Dutch abbreviation TOP, which translates to "interim repository of excavated soil".</p> <p>PCB-contaminated transformers are incinerated in a controlled manner with recovery of chlorine. Residue after incineration is recycled. No data are available on volume or weight of these separate fractions.</p>		
306-3	Waste generated	Total of 306-4 and 306-5 below	Total of 306-4 and 306-5 below	Resource outflows [E5-5] (see pages 202-204)

Code	Description	2022	2023	2024
306-4	Waste diverted from disposal			
	Soil	463,000 ton	593,000 ton	Resource outflows [E5-5] (see pages 202-204)
	Transformers and related equipment, non-PCB-contaminated	552 ton	501 ton	Resource outflows [E5-5] (see pages 202-204)
	Other fractions	2,414 ton + 2,911 m <sup>3</sup>	3,067 ton + 1,351 m <sup>3</sup>	Resource outflows [E5-5] (see pages 202-204)
306-5	Waste directed to disposal			
	Transformers, PCB-contaminated	45 ton	59 ton	Resource outflows [E5-5] (see pages 202-204)
	Other fractions	983 ton + 1,033 m <sup>3</sup>	851 ton + 109 m <sup>3</sup>	Resource outflows [E5-5] (see pages 202-204)
<b>307</b>	<b>Environmental Compliance</b>			
307-1	Non-compliance with environmental laws and regulations	None	None	None
<b>308</b>	<b>Supplier Environmental Assessment</b>			
3-3	Management of material topics	-	-	Management of relationships with suppliers [G1-2] (see pages 308-311)
308-1	New suppliers that were screened using environmental criteria	Compulsory exclusion grounds: fraud, child labour, illegal labour. Facultative exclusion grounds: infringements on environmental, labour and social laws. Similar clauses included in terms of reference, and collaboration with social inspection authorities.		
	For major suppliers of products:	{80 suppliers and 136 production sites}: check of CSR policies and frequent onsite audits (approx 55 site visits).	{80 suppliers and 136 production sites}: check of CSR policies and frequent onsite audits (approx 70 site visits).	{80 suppliers and 136 production sites}: check of CSR policies and frequent onsite audits (approx 92 site visits).  Digital supplier screenings have taken place as well.
		Digital supplier screenings have taken place as well.	Digital supplier screenings have taken place as well.	Also refer to <a href="#">Socially Responsible Procurement</a> (see pages 310-311).
308-2	Negative environmental impacts in the supply chain and actions taken	Since 2019, Fluvius is affiliated with the Ecovadis platform for the screening of suppliers. 20 suppliers and contractors have been surveyed in Ecovadis campaign, of which 13 with positive results. The campaign consisted of evaluation of additional suppliers and re-evaluation of the existing portfolio.	52 suppliers obtained an Ecovadis scorecard, or had their score reevaluated. 66% of reevaluations in our existing portfolio proved improvements.	82 suppliers have an Ecovadis scorecard. Together they cover 39.8% of total spend on suppliers.

## GRI Social Topic Standards

Code	Description	2022	2023	2024
<b>401</b>	<b>Employment</b>			
3-3	Management of material topics	-	-	<p>Policies related to own workforce (S1-1) [see pages 211-224]</p> <p>Processes for engaging with own workers and workers' representatives about impacts (S1-2) [see pages 225-228]</p> <p>Actions linked to material impact, and approaches to manage risks and opportunities, and the effectiveness of those actions (S1-4) [see pages 230-230]</p> <p>Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S1-5) [see pages 231-231]</p> <p>Policies related to value chain workers (S2-1) [see pages 247-252]</p> <p>Processes for engaging with value chain workers about impacts (S2-2) [see pages 253-253]</p> <p>Acteren op materiële impacts op werknemers in de waardeketen, beheersen van hun materiële risico's, benutten van hun materiële kansen, en de effectiviteit van die maatregelen (S2-4) [see pages 255-256]</p> <p>Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S2-5) [see pages 257-257]</p>
401-1	New employee hires and employee turnover	275 hires (270 full-time) / 273 exits (230 full-time, 43 part-time)	535 hires (522 full-time) / 270 exits (222 full-time, 48 part-time)	Characteristics of Fluvius employees (S1-6) [see pages 232-232]
401-2	Benefits provided to full-time employees that are not provided temporary or part-time employees	All pay-outs and benefits for full-time employees are also available, on a pro rata basis, for part-time employees.		
401-3	Parental leave	3,069 days of parental leave (= 0.25% of total number of labour days)	2,827 days of parental leave (= 0.22% of total number of labour days)	Work-life balance metrics (S1-15) [see pages 241-241]

Code	Description	2022	2023	2024
<b>402</b>	<b>Labour/Management Relations</b>			
3-3	Management of material topics	-	-	<p>Policies related to own workforce (S1-1) [see pages 211-224]</p> <p>Processes for engaging with own workers and workers' representatives about impacts (S1-2) [see pages 225-228]</p> <p>Actions linked to material impact, and approaches to manage risks and opportunities, and the effectiveness of those actions (S1-4) [see pages 230-230]</p> <p>Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S1-5) [see pages 231-231]</p> <p>Policies related to value chain workers (S2-1) [see pages 247-252]</p> <p>Processes for engaging with value chain workers about impacts (S2-2) [see pages 253-253]</p> <p>Acteren op materiële impacts op werknemers in de waardeketen, beheersen van hun materiële risico's, benutten van hun materiële kansen, en de effectiviteit van die maatregelen (S2-4) [see pages 255-256]</p> <p>Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S2-5) [see pages 257-257]</p>
402-1	Minimum notice periods regarding operational changes	Fully conforming to Belgian labour legislation: when jobs disappear as a result of operational changes, all employees are redeployed to other jobs in Fluvius.		

Code	Description	2022	2023	2024
<b>403</b>	<b>Occupational Health and Safety</b>			
3-3	Management of material topics	-	-	<p>Human rights (see pages 213-213)</p> <p>Prevention of accidents at work (see pages 214-215)</p> <p>Well-being (see pages 223-224)</p> <p>Processes for engaging with own workers and workers' representatives about impacts (S1-2) (see pages 225-228)</p> <p>Actions linked to material impact, and approaches to manage risks and opportunities, and the effectiveness of those actions (S1-4) (see pages 230-230)</p> <p>Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S1-5) (see pages 231-231)</p> <p>Policies related to value chain workers (S2-1) (see pages 247-252)</p> <p>Processes for engaging with value chain workers about impacts (S2-2) (see pages 253-253)</p> <p>Acteren op materiële impacts op werknemers in de waardeketen, beheersen van hun materiële risico's, benutten van hun materiële kansen, en de effectiviteit van die maatregelen (S2-4) (see pages 255-256)</p> <p>Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S2-5) (see pages 257-257)</p>
403-1	Occupational health and safety management system	Occupational health and safety management is implemented as required by Belgian labour legislation and Collective Bargaining Agreements for the sector of gas and electricity companies in Belgium.		Prevention of accidents at work (see pages 214-215).
		All workers, activities and workplaces are covered.		

Code	Description	2022	2023	2024
403-2	Hazard identification, risk assessment, and incident investigation	<p>The dynamic welfare care system forms the basis for managing welfare risks within the company. This care system seeks continuous improvement so that all employees take care of the health and safety of themselves, internal and external colleagues, customers and other people involved.</p> <p>An internal guideline describes the approach for hazard identification, risk analysis and risk management, enabling the organisation to identify, evaluate and manage its welfare risks on an ongoing basis.</p> <p>All accidents and incidents are reported and investigated. The investigation always takes place in cooperation between the internal prevention department and the organisation's line management, with an advisory role by the Committee for Prevention and Protection at Work. Accidents and incidents involving contractors are also reported and investigated, in consultation between the Fluvius prevention services and the contractor.</p>		Processes to remediate negative impacts and channels for own workers to raise concerns [S1-3] [see pages 229-229]
403-3	Occupational health services	<p>Fluvius has an Internal service for Prevention and Protection at the Workplace (IPPW). Besides fulfilling its legal missions, the IPPW supports management and employees in the elaboration, programming, implementation and evaluation of the welfare policy and the application of regulatory provisions. The IPPW's identification document describes in detail the structure and operation of the prevention service.</p> <p>For assignments that the IPPW cannot perform itself, it calls on an approved External service for Prevention and Protection at the Workplace (EPPW). These assignments include:</p> <ul style="list-style-type: none"> <li>• specific advice, risk analysis and support on health, hygiene, ergonomics, toxicology and psychosocial aspects.</li> <li>• Provide health monitoring of Fluvius employees.</li> </ul> <p>In the framework of psychosocial aspects, internal follow-up is provided by, among others, social assistants and confidential counsellors; these are assisted by an external prevention advisor on psychosocial aspects.</p>		Processes to remediate negative impacts and channels for own workers to raise concerns [S1-3] [see pages 229-229]
403-4	Worker participation, consultation, and communication on occupational health and safety	<p>100% of employees is represented through elected Committees for Prevention &amp; Protection at the Workplace, conforming to Belgian labour legislation. The preceding social elections took place on November 19th, 2020.</p>		Organisation of social dialogue [see pages 228-228]



Code	Description	2022	2023	2024
403-5	Worker training on occupational health and safety	Discussion of safety performance and issues is part of monthly meetings in all teams.		
403-6	Promotion of worker health	-	-	Well-being [see pages 223-224]
403-7	Prevention and mitigation of occupational health and safety impacts by business relationships	-	-	Acteren op materiële impacts op werknemers in de waardeketen, beheersen van hun materiële risico's, benutten van hun materiële kansen, en de effectiviteit van die maatregelen [S2-4] [see pages 255-256]
403-8	Workers covered by an occupational health and safety management system	All employees are covered. Contractors present at Fluvius workplaces and construction sites are covered by Belgian labour legislation and contractual agreements.		
403-9	Work-related injuries	-	-	Health and safety metrics [S1-14] [see pages 240-240]
	Frequency (/1Mh)	6.33	4.09	
	Severity (/1Mh)	0.16	0.07	
	Nr of lost labour days	1,297	600	
	Nr of occupational accidents with labour days lost	50	33	
	Nr of work-related fatalities	None	None	
	Sick days (not work-related)	71,162	73,475	
403-10	Work-related ill health	Fluvius registers employees with risk of possible exposure to lead or asbestos, but the company is of the opinion that this does not involve a high risk of occupational disease.		
		Fluvius implements an active policy of maximum risk reduction.		

Code	Description	2022	2023	2024
<b>404</b>	<b>Training and education</b>			
3-3	Management of material topics	-	-	<p>The ambition of HR (see pages 212-213)</p> <p>The role of HR in the various strategic engagements (see pages 213-213)</p> <p>Human rights (see pages 213-213)</p> <p>Career and development (see pages 220-221)</p> <p>Well-being (see pages 223-224)</p> <p>Actions linked to material impact, and approaches to manage risks and opportunities, and the effectiveness of those actions (S1-4) (see pages 230-230)</p> <p>Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S1-5) (see pages 231-231)</p> <p>Qualification systems (see pages 251-251)</p> <p>Acteren op materiële impacts op werknemers in de waardeketen, beheersen van hun materiële risico's, benutten van hun materiële kansen, en de effectiviteit van die maatregelen (S2-4) (see pages 255-256)</p>
404-1	Average hours of training per year per employee	25.96 hours/employee*	25.94 hours/employee*	<p>Training and skills development metrics (S1-13) (see pages 239-239)</p> <p>The figures in S1-13 only contain active employees.</p>
404-2	Programmes for upgrading employee skills and transition assistance programmes	...are part of the entire scale of training programmes on offer.		Career and development (see pages 220-221)
404-3	Percentage of employees receiving regular performance and career development reviews	All employees (management, executives, others) are involved in performance evaluation. There is a wide offer of career development available for all our employees.		Training and skills development metrics (S1-13) (see pages 239-239)

Code	Description	2022	2023	2024
<b>405</b>	<b>Diversity and Equal Opportunity</b>			
3-3	Management of material topics	-	-	<p>Human rights (see pages 213-213)</p> <p>Diversity and inclusion policy (see pages 215-217)</p> <p>Actions linked to material impact, and approaches to manage risks and opportunities, and the effectiveness of those actions (S1-4) (see pages 230-230)</p> <p>Human rights policy (see pages 249-250)</p> <p>Supplier code of conduct (see pages 250-250)</p> <p>Processes for engaging with value chain workers about impacts (S2-2) (see pages 253-253)</p>
405-1	Diversity of governance bodies and employees	As to diversity, we ensure that diversity in society is also being reflected in the company itself. For the composition of the Board of Directors, Fluvius complies with the legal rule of 'at least 1/3 of directors is of a different sex than the majority of directors.		<p>Board of Directors (see pages 22-24)</p> <p>Management Committee (see pages 26-27)</p> <p>Characteristics of Fluvius employees (S1-6) (see pages 232-232)</p> <p>Diversity metrics (S1-9) (see pages 235-235)</p> <p>Persons with disabilities (S1-12) (see pages 238-238)</p>
405-2	Ratio of basic salary and remuneration of women to men	(Results available only after publication of the annual report on 2022)	<p>Wages at all levels are independent of gender. The bi-annual Wage Gap Report (2021-22) was extensively discussed by the Works Council on 28/3 and 25/4/2023. It shows that</p> <ol style="list-style-type: none"> <li>1. gender neutrality is guaranteed,</li> <li>2. salary is only determined by the nature of the job executed ('method of qualification') and</li> <li>3. no action plan is needed.</li> </ol>	<p>Compensation metrics (pay gap and total compensation) (S1-16) (see pages 242-242)</p>

Code	Description	2022	2023	2024
<b>406</b>	<b>Non-discrimination</b>			
3-3	Management of material topics	-	-	<p>Human rights (see pages 213-213)</p> <p>Diversity and inclusion policy (see pages 215-217)</p> <p>Policies related to value chain workers (S2-1) (see pages 247-252)</p> <p>General policy (see pages 261-261)</p> <p>Human rights policy (see pages 271-271)</p>
406-1	Incidents of discrimination and corrective actions taken	None	None	Incidents, complaints and severe human rights impacts (S1-17) (see pages 243-243)
<b>407</b>	<b>Freedom of Association and Collective Bargaining</b>			
3-3	Management of material topics	-	-	<p>Processes for engaging with own workers and workers' representatives about impacts (S1-2) (see pages 225-228)</p> <p>Policies related to value chain workers (S2-1) (see pages 247-252)</p> <p>Human rights policy (see pages 249-250)</p> <p>Supplier code of conduct (see pages 250-250)</p> <p>Consultation with workers in the value chain (see pages 250-250)</p> <p>Processes for engaging with value chain workers about impacts (S2-2) (see pages 253-253)</p>
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	No operations with such risk	No operations with such risk	Human rights policy (see pages 249-250)

Code	Description	2022	2023	2024
<b>408</b>	<b>Child Labour</b>			
3-3	Management of material topics	-	-	Human rights policy [see pages 249-250]  Incidents, complaints and severe human rights impacts [S1-17] [see pages 243-243]  Material impacts, risks and opportunities and their interaction with strategy and business model [S2.SBM-3] [see pages 246-246]  Application of applicable regulations on workers in the value chain [see pages 248-249]  Supplier code of conduct [see pages 250-250]
408-1	Operations and suppliers at significant risk for incidents of child labour	No operations with such risk	No operations with such risk	Human rights policy [see pages 249-250]
<b>409</b>	<b>Forced or Compulsory Labour</b>			
3-3	Management of material topics	-	-	Human rights policy [see pages 249-250]  Incidents, complaints and severe human rights impacts [S1-17] [see pages 243-243]  Material impacts, risks and opportunities and their interaction with strategy and business model [S2.SBM-3] [see pages 246-246]  Application of applicable regulations on workers in the value chain [see pages 248-249]  Supplier code of conduct [see pages 250-250]
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	No operations with such risk	No operations with such risk	Human rights policy [see pages 249-250]
<b>410</b>	<b>Security Practices</b>			
3-3	Management of material topics	-	-	General policy [see pages 261-261]
410-1	Security personnel trained in human rights policies or procedures	Not applicable	Not applicable	Not applicable

Code	Description	2022	2023	2024
<b>411</b>	<b>Rights of Indigenous Peoples</b>			
3-3	Management of material topics	-	-	General policy (see pages 261-261)
411-1	Incidents of violations involving rights of indigenous peoples	Not applicable	Not applicable	General policy (see pages 261-261)
<b>412</b>	<b>Human Rights Assessment</b>			
3-3	Management of material topics	-	-	General policy (see pages 261-261)
412-1	Operations that have been screened to human rights reviews or impact assessments	Not applicable	Not applicable	General policy (see pages 261-261)
412-2	Employee training on human rights policies or procedures	Not applicable	Not applicable	Not applicable
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	In administrative terms of reference, conditions are included in line with the norms of the International Labour Organisation (ILO). Potential suppliers underwrite a Code of Conduct, which also involves their own (sub)contractors, suppliers and holders of licences.	In administrative terms of reference, conditions are included in line with the norms of the International Labour Organisation (ILO). Potential suppliers underwrite a Code of Conduct, which also involves their own (sub)contractors, suppliers and holders of licences.  At the end of 2023 an updated <a href="#">Supplier Code of Conduct</a> was published on our website, with explicit reference to relevant international conventions.	
<b>413</b>	<b>Local Communities</b>			
3-3	Management of material topics	-	-	General policy (see pages 261-261)
413-1	Operations with local community engagement, impact assessment, and development programmes	Fluvius is an active partner for the Flemish local authorities (all cities and municipalities).		Processes for engaging with affected communities about impacts (S3-2) (see pages 263-263)  Processes to remediate negative impacts and channels for affected communities to raise concerns (S3-3) (see pages 264-264)  Acteren op materiële impacts op getroffen gemeenschappen, beheersen van hun materiële risico's, benutten van hun materiële kansen, en de effectiviteit van die maatregelen (S3-4) (see pages 265-265)
413-2	Operations with significant actual and potential impact on local communities	Not applicable	Our <a href="#">Double materiality analysis (DMA)</a> (full report <a href="#">Dubbele Materialiteitsanalyse 2023</a> only in Dutch) identified 1 real and 1 potential negative impact, but neither is material. 5 positive impacts were identified as well, 3 of which are material.	

Code	Description	2022	2023	2024
<b>414</b>	<b>Supplier Social Assessment</b>			
3-3	Management of material topics	-	-	Management of relationships with suppliers (G1-2) [see pages 308-311]
414-1	New suppliers that were screened using social criteria	Fluvius integrates social criteria in its terms of reference to a maximum degree and within the boundaries set by the public procurement legislation.		Socially Responsible Procurement [see pages 310-311]
414-2	Negative social impacts in the supply chain and actions taken	Refer to 308-2 for actions in the supply chain.  Fluvius has no operations with risks as described under 407-1, 408-1 and 409-1.		Refer to 308-2 and <a href="#">Human rights policy</a> [see pages 249-250].
<b>415</b>	<b>Public Policy</b>			
3-3	Management of material topics	-	-	Political influence and lobbying activities (G1-5) [see pages 315-317]
415-1	Political contributions	None	None	None
<b>416</b>	<b>Customer Health and Safety</b>			
3-3	Management of material topics	-	-	Policies related to consumers and end-users (S4-1) [see pages 270-271]  Processes for engaging with consumers and end-users about impacts (S4-2) [see pages 272-273]  <a href="#">Acteren op materiële impacts op consumenten en eindgebruikers, beheersen van hun materiële risico's, benutten van hun materiële kansen, en de effectiviteit van die maatregelen (S4-4)</a> [see pages 275-275]  Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S4-5) [see pages 276-276]
416-1	Assessment of the health and safety impacts of product and service categories	Fluvius is well aware of the potential hazards of electricity and gas. Therefore, the company strives to create a fully-fledged safety culture internally.  Externally, all necessary safety precautions are implemented.		Fluvius is well aware of the potential hazards of electricity and gas. Therefore, the company strives to create a fully-fledged safety culture internally. Also refer to <a href="#">Prevention of accidents at work</a> [see pages 214-215].  Externally, all necessary safety precautions are implemented.

Code	Description	2022	2023	2024
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	None	None	None
<b>417</b>	<b>Marketing and Labeling</b>			
3-3	Management of material topics	-	-	<a href="#">Informing the customer (see pages 272-273)</a>
417-1	Requirements for product and service information and labeling	Not applicable	Not applicable	Not applicable
417-2	Incidents of non-compliance concerning product and service information and labeling	Not applicable	Not applicable	Not applicable
417-3	Incidents of non-compliance concerning marketing communications	No incidents reported	No incidents reported	No incidents reported
<b>418</b>	<b>Customer Privacy</b>			
3-3	Management of material topics	-	-	<a href="#">Secure data and infrastructure - cybersecurity (see pages 296-296)</a>
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	2	1	4



## List of disclosure requirements complied with in the sustainability statements

Disclosure requirement	Title	Page number	Disclosure requirement	Title	Page number
BP-1	General basis for preparation of sustainability statements		MDR-A	Actions and resources in relation to material sustainability matters	
BP-2	Disclosures in relation to specific circumstances		MT	Metrics and targets	
GOV-1	The role of the governing, management and supervisory bodies		E1-1	Transition plan for climate mitigation	139
GOV-2	Information provided to and sustainability matters addressed by the undertakings governing, management and supervisory bodies		E1-2	Policies related to climate change mitigation and adaptation	148
GOV-3	Integration of sustainability-related performance in incentive schemes		E1-3	Actions and resources in relation to climate change mitigation and adaptation	153
GOV-4	Statement on due diligence		E1-4	Targets related to climate change mitigation and adaptation	158
GOV-5	Risk management and internal controls over sustainability reporting		E1-5	Energy consumption and mix	159
SBM-1	Strategy, business model and value chain		E1-6	Gross scope 1-, 2-, 3-emissions and total GHG emissions	160
SBM-2	Interests and views of stakeholders		E1-7	GHG removals and GHG mitigation projects financed through carbon credits	165
SBM-3	Materials impacts, risks and opportunities and their interaction with strategy and business model		E1-8	Internal carbon pricing	165
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities		E2-1	Policies related to pollution	168
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statements		E2-2	Actions and resources related to pollution	174
MDR-P	Policies adopted to manage material sustainability matters		E2-3	Targets related to pollution	177
			E2-4	Pollution of air, water and soil	178
			E3-1	Policies related to water	181
			E3-2	Actions and resources related to water	187
			E3-3	Targets related to water	191
			E3-4	Water consumption	192
			E5-1	Policies related to resource use and circular economy	195

Disclosure requirement	Title	Page number	Disclosure requirement	Title	Page number
E5-2	Actions and resources related to resource use and circular economy	196	S1-17	Incidents, complaints and severe human rights impacts	243
E5-3	Targets related to resource use and circular economy	199	S2-1	Policies related to value chain workers	247
E5-4	Resource inflows	200	S2-2	Processes for engaging with value chain workers about impacts	253
E5-5	Resource outflows	202	S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	254
S1-1	Policies related to own workforce	211	S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	255
S1-2	Processes for engaging with own workers and workers' representatives about impacts	225	S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	257
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	229	S3-1	Policies related to affected communities	261
S1-4	Actions linked to material impact, and approaches to manage risks and opportunities, and the effectiveness of those actions	230	S3-2	Processes for engaging with affected communities about impacts	263
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	231	S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	264
S1-6	Characteristics of Fluvius employees	232	S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	265
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	233	S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	266
S1-8	Collective bargaining coverage and social dialogue	234	S4-1	Policies related to consumers and end-users	270
S1-9	Diversity metrics	235	S4-2	Processes for engaging with consumers and end-users about impacts	272
S1-10	Adequate wages	236			
S1-11	Social protection	237			
S1-12	Persons with disabilities	238			
S1-13	Training and skills development metrics	239			
S1-14	Health and safety metrics	240			
S1-15	Work-life balance metrics	241			
S1-16	Compensation metrics (pay gap and total compensation)	242			

Disclosure requirement	Title	Page number
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	274
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	275
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	276
G1-1	Corporate culture and business conduct policies	305
G1-2	Management of relationships with suppliers	308
G1-3	Prevention and detection of corruption and bribery	312
G1-4	Confirmed incidents of corruption or bribery	314
G1-5	Political influence and lobbying activities	315
G1-6	Payment practices	318

## List of datapoints in cross-cutting and topical standards that derive from other EU legislation

As ESRS 2 Appendix B demands, an overview is provided of all datapoints in cross-cutting and topical standards that derive from other EU legislation.

Rapportage-eis en betrokken datapunt	Referentie SFDR	Pijler 3-referentie	Referentie benchmarkverordening	Referentie EU-Klimaatwet	Verwijzing naar betrokken datapunt
ESRS 2 GOV-1 Genderdiversiteit raad van bestuur alinea 21(d)	Indicator nr. 13 van tabel 1 van bijlage I		Gedelegeerde Verordening (EU) 2020/1816 van de Commissie <sup>[27]</sup> , bijlage II		21
ESRS 2 GOV-1 Percentage onafhankelijke bestuurders alinea 21(e)			Gedelegeerde Verordening (EU) 2020/1816, bijlage II		21
ESRS 2 GOV-4 Due-diligence-verklaring alinea 30	Indicator nr. 10 van tabel 3 van bijlage I				
ESRS 2 SBM-1 Betrokkenheid bij activiteiten m.b.t. activiteiten fossiele brandstoffen alinea 40(d) i	Indicator nr. 4 van tabel 1 van bijlage I	Art. 449 bis van Verordening (EU) nr. 575/2013; Uitvoerings-verordening (EU) 2022/2453 van de Commissie <sup>[28]</sup> , Tabel 1 – Kwalitatieve informatie over ecologisch risico en Tabel 2 – Kwalitatieve informatie over sociaal risico	Gedelegeerde Verordening (EU) 2020/1816, bijlage II		
ESRS 2 SBM-1 Betrokkenheid bij activiteiten m.b.t. chemische productie alinea 40(d) ii	Indicator nr. 9 van tabel 2 van bijlage I		Gedelegeerde Verordening (EU) 2020/1816, bijlage II		Niet materieel
ESRS 2 SBM-1 Betrokkenheid bij activiteiten m.b.t. controversiële wapens alinea 40(d) iii	Indicator nr. 14 van tabel 1 van bijlage I		Gedelegeerde Verordening (EU) 2020/1818 <sup>[29]</sup> , art. 12, lid 1; Gedelegeerde Verordening (EU) 2020/1816, bijlage II		Niet materieel

Rapportage-eis en betrokken datapunt	Referentie SFDR	Pijler 3-referentie	Referentie benchmarkverordening	Referentie EU-Klimaatwet	Verwijzing naar betrokken datapunt
ESRS 2 SBM-1 Betrokkenheid bij activiteiten m.b.t. teelt en productie tabak alinea 40(d) iv			Gedelegeerde Verordening (EU) 2020/1818, art. 12, lid 1; Gedelegeerde Verordening (EU) 2020/1816, bijlage II		Niet materieel
ESRS E1-1 Transitieplan om tegen 2050 klimaatneutraliteit te bereiken alinea 14				Verordening (EU) 2021/1119, art. 2, lid 1	139
ESRS E1-1 Ondernemingen uitgesloten van op Overeenkomst van Parijs afgestemde benchmarks alinea 16(g)		Art. 449 bis van Verordening (EU) nr. 575/2013; Uitvoeringsverordening (EU) 2022/2453 van de Commissie, Template 1: Banking book – Transitierisico's i.v.m. klimaat-verandering: Kredietkwaliteit blootstellingen per sector, emissies en resterende looptijd	Gedelegeerde Verordening (EU) 2020/1818, art. 12, lid 1, punten d) t/m g), en art. 12, lid 2		140
ESRS E1-4 Doelen BKG-emissiereductie alinea 34	Indicator nr. 4 van tabel 2 van bijlage I	Art. 449 bis van Verordening (EU) nr. 575/2013; Uitvoeringsverordening (EU) 2022/2453 van de Commissie, Template 3: Banking book – Indicatoren van potentiële transitierisico's i.v.m. klimaat-verandering: Afstemmingsmaatstaven	Gedelegeerde Verordening (EU) 2020/1818, art. 6		140
ESRS E1-5 Totale energieverbruik uit hernieuwbare bronnen, uitgesplitst naar bronnen (alleen sectoren met grote klimaatimpact) alinea 38	Indicator nr. 5 van tabel 1 en indicator nr. 5 van tabel 2 van bijlage I				159

Rapportage-eis en betrokken datapunt	Referentie SFDR	Pijler 3-referentie	Referentie benchmarkverordening	Referentie EU-Klimaatwet	Verwijzing naar betrokken datapunt
ESRS E1-5 Energieverbruik en energiemix alinea 37	Indicator nr. 5 van tabel 1 van bijlage I				159
ESRS E1-5 Energie-intensiteit activiteiten in sectoren met grote klimaatimpact alinea's 40 t/m 43	Indicator nr. 6 van tabel 1 van bijlage I				159
ESRS E1-6 Bruto scope 1-, 2-, 3-emissies en totale BKG-emissies alinea 44	Indicatoren nrs. 1 en 2 van tabel 1 van bijlage I	Art. 449 bis van Verordening (EU) nr. 575/2013; Uitvoeringsverordening (EU) 2022/2453 van de Commissie, Template 1: Banking book – Transitierisico's i.v.m. klimaat-verandering: Kredietkwaliteit blootstellingen per sector, emissies en resterende looptijd	Gedelegeerde Verordening (EU) 2020/1818, art. 5, lid 1, art. 6 en art. 8, lid 1		160
ESRS E1-6 Intensiteit bruto-BKG-emissies alinea's 53 t/m 55	Indicator nr. 3 van tabel 1 van bijlage I	Art. 449 bis van Verordening (EU) nr. 575/2013; Uitvoeringsverordening (EU) 2022/2453 van de Commissie, Template 3: Banking book – Indicatoren van potentiële transitierisico's i.v.m. klimaat-verandering: Afstemmingsmaatstaven	Gedelegeerde Verordening (EU) 2020/1818, art. 8, lid 1		164
ESRS E1-7 BKG-verwijderingen en carbon credits alinea 56				Verordening (EU) 2021/1119, art. 2, lid 1	165
ESRS E1-9 Blootstelling benchmarkportefeuille aan fysieke klimaatrisico's alinea 66			Gedelegeerde Verordening (EU) 2020/1818, bijlage II; Gedelegeerde Verordening (EU) 2020/1816, bijlage II		Phase-in

Rapportage-eis en betrokken datapunt	Referentie SFDR	Pijler 3-referentie	Referentie benchmarkverordening	Referentie EU-Klimaatwet	Verwijzing naar betrokken datapunt
<p>ESRS E1-9</p> <p>Uitsplitsing geldbedragen in acuut en chronisch fysiek risico alinea 66(a)</p> <p>ESRS E1-9</p> <p>Locatie significante activa die materieel fysiek risico lopen alinea 66(c)</p>		<p>Art. 449 bis van Verordening (EU) nr. 575/2013;</p> <p>Uitvoerings-verordening (EU) 2022/2453 van de Commissie, alinea's 46 en 47; Template 5: Banking book – Klimaat-verandering fysiek risico: Aan fysiek risico onderhevige blootstellingen</p>			Phase-in
<p>ESRS E1-9 Uitsplitsing boekwaarde vastgoedactiva naar energie-efficiëntieklasse alinea 67(c)</p>		<p>Art. 449 bis van Verordening (EU) nr. 575/2013;</p> <p>Uitvoerings-verordening (EU) 2022/2453 van de Commissie, alinea 34; Template 2: Banking book – Transitierisico's i.v.m. klimaat-verandering: Leningen gedekt door zekerheden in de vorm van onroerend goed – Energie-efficiëntie van de zekerheid</p>			Phase-in
<p>ESRS E1-9</p> <p>Mate blootstelling portefeuille aan klimaatkansen alinea 69</p>			<p>Gedelegeerde Verordening (EU) 2020/1818, bijlage II</p>		Phase-in
<p>ESRS E2-4</p> <p>Hoeveelheid emissies naar lucht, water en bodem van elke verontreinigende stof in bijlage II bij E-PRTR-verordening (Europees register uitstoot en overbrenging verontreinigende stoffen) alinea 28</p>	<p>Indicator nr. 8 van tabel 1 van bijlage I</p> <p>Indicator nr. 2 van tabel 2 van bijlage I</p> <p>Indicator nr. 1 van tabel 2 van bijlage I</p> <p>Indicator nr. 3 van tabel 2 van bijlage I</p>				178
<p>ESRS E3-1</p> <p>Water en mariene hulpbronnen alinea 9</p>	<p>Indicator nr. 7 van tabel 2 van bijlage I</p>				181

Rapportage-eis en betrokken datapunt	Referentie SFDR	Pijler 3-referentie	Referentie benchmarkverordening	Referentie EU-Klimaatwet	Verwijzing naar betrokken datapunt
ESRS E3-1 Specifiek beleid alinea 13	Indicator nr. 8 van tabel 2 van bijlage I				181
ESRS E3-1 Duurzame oceanen en zeeën alinea 14	Indicator nr. 12 van tabel 2 van bijlage I				Niet materieel
ESRS E3-4 Totale hoeveelheid gerecycled en hergebruikt water alinea 28(c)	Indicator nr. 6.2 van tabel 2 van bijlage I				192
ESRS E3-4 Totale waterverbruik in m <sup>3</sup> per netto-opbrengst eigen activiteiten alinea 29	Indicator nr. 6.1 van tabel 2 van bijlage I				192
ESRS 2 – IRO-1 – E4 alinea 16(a) i	Indicator nr. 7 van tabel 1 van bijlage I				Niet materieel
ESRS 2 – IRO-1 – E4 alinea 16(b)	Indicator nr. 10 van tabel 2 van bijlage I				Niet materieel
ESRS 2 – IRO-1 – E4 alinea 16(c)	Indicator nr. 14 van tabel 2 van bijlage I				Niet materieel
ESRS E4-2 Praktijken of beleid duurzaam beheer bodem / duurzame landbouw alinea 24(b)	Indicator nr. 11 van tabel 2 van bijlage I				Niet materieel
ESRS E4-2 Praktijken of beleid duurzaam beheer oceanen / zee alinea 24(c)	Indicator nr. 12 van tabel 2 van bijlage I				Niet materieel
ESRS E4-2 Beleid tegen ontbossing alinea 24(d)	Indicator nr. 15 van tabel 2 van bijlage I				Niet materieel
ESRS E5-5 Niet-gerecycled afval alinea 37(d)	Indicator nr. 13 van tabel 2 van bijlage I				203
ESRS E5-5 Gevaarlijk afval en radioactief afval alinea 39	Indicator nr. 9 van tabel 1 van bijlage I				203
ESRS 2 – SBM3 – S1 Risico incidenten gedwongen arbeid alinea 14(f)	Indicator nr. 13 van tabel 3 van bijlage I				209
ESRS 2 – SBM3 – S1 Risico incidenten kinderarbeid alinea 14(g)	Indicator nr. 12 van tabel 3 van bijlage I				209



Rapportage-eis en betrokken datapunt	Referentie SFDR	Pijler 3-referentie	Referentie benchmarkverordening	Referentie EU-Klimaatwet	Verwijzing naar betrokken datapunt
ESRS S1-1 Toezeggingen op gebied van mensenrechtenbeleid alinea 20	Indicator nr. 9 van tabel 3 en indicator nr. 11 van tabel 1 van bijlage I				213
ESRS S1-1 Due-diligencebeleid rond kwesties aan de orde in fundamentele verdragen 1 t/m 8 van Internationale Arbeidsorganisatie alinea 21			Gedelegeerde Verordening (EU) 2020/1816, bijlage II		213
ESRS S1-1 Procedures en maatregelen ter voorkoming van mensenhandel alinea 22	Indicator nr. 11 van tabel 3 van bijlage I				213
ESRS S1-1 Beleid of beheersysteem ter voorkoming van arbeidsongevallen alinea 23	Indicator nr. 1 van tabel 3 van bijlage I				214
ESRS S1-3 Klachtenregelingen alinea 32(c)	Indicator nr. 5 van tabel 3 van bijlage I				229
ESRS S1-14 Aantal sterfgevallen en aantal en aandeel arbeidsongevallen alinea 88(b) en (c)	Indicator nr. 2 van tabel 3 van bijlage I		Gedelegeerde Verordening (EU) 2020/1816, bijlage II		240
ESRS S1-14 Aantal verzuimdagen als gevolg van letsel, ongevallen, dodelijke ongevallen of ziekte alinea 88(e)	Indicator nr. 3 van tabel 3 van bijlage I				240
ESRS S1-16 Niet-gecorrigeerde loonkloof man-vrouw alinea 97(a)	Indicator nr. 12 van tabel 1 van bijlage I		Gedelegeerde Verordening (EU) 2020/1816, bijlage II		242
ESRS S1-16 Ratio buitensporige beloning CEO alinea 97(b)	Indicator nr. 8 van tabel 3 van bijlage I				242
ESRS S1-17 Gevalen van discriminatie alinea 103(a)	Indicator nr. 7 van tabel 3 van bijlage I				243
ESRS S1-17 Niet-nakoming UNGP's on Business and Human Rights en OESO-richtlijnen alinea 104(a)	Indicator nr. 10 van tabel 1 en indicator nr. 14 van tabel 3 van bijlage I		Gedelegeerde Verordening (EU) 2020/1816, bijlage II; Gedelegeerde Verordening (EU) 2020/1818, art. 12, lid 1		243

Rapportage-eis en betrokken datapunt	Referentie SFDR	Pijler 3-referentie	Referentie benchmarkverordening	Referentie EU-Klimaatwet	Verwijzing naar betrokken datapunt
ESRS S2 – SBM3 – S2 Aanzienlijk risico kinderarbeid of gedwongen arbeid in waardeketen alinea 11(b)	Indicatoren nrs. 12 en 13 van tabel 3 van bijlage I				246
ESRS S2-1 Toezeggingen op gebied van mensenrechtenbeleid alinea 17	Indicator nr. 9 van tabel 3 en indicator nr. 11 van tabel 1 van bijlage I				249
ESRS S2-1 Beleid ten aanzien van werknemers in waardeketen alinea 18	Indicatoren nrs. 11 en 4 van tabel 3 van bijlage I				247
ESRS S2-1 Niet-nakoming UNGP's on Business and Human Rights en OESO-richtlijnen alinea 19	Indicator nr. 10 van tabel 1 van bijlage I		Gedelegeerde Verordening (EU) 2020/1816, bijlage II; Gedelegeerde Verordening (EU) 2020/1818, art. 12, lid 1		249
ESRS S2-1 Due-diligencebeleid rond kwesties aan de orde in fundamentele verdragen 1 t/m 8 van Internationale Arbeidsorganisatie alinea 19			Gedelegeerde Verordening (EU) 2020/1816, bijlage II		249
ESRS S2-4 Mensenrechten-problemen en -incidenten m.b.t. upstream- en downstream-waardeketen alinea 36	Indicator nr. 14 van tabel 3 van bijlage I				255
ESRS S3-1 Toezeggingen op gebied van mensenrechten-beleid alinea 16	Indicator nr. 9 van tabel 3 van bijlage I en indicator nr. 11 van tabel 1 van bijlage I				261
ESRS S3-1 Niet-nakoming UNGP's on Business and Human Rights, ILO-beginselen en/of OESO-richtlijnen alinea 17	Indicator nr. 10 van tabel 1 van bijlage I		Gedelegeerde Verordening (EU) 2020/1816, bijlage II; Gedelegeerde Verordening (EU) 2020/1818, art. 12, lid 1		261
ESRS S3-4 Mensenrechtenproblemen en -incidenten alinea 36	Indicator nr. 14 van tabel 3 van bijlage I				265

Rapportage-eis en betrokken datapunt	Referentie SFDR	Pijler 3-referentie	Referentie benchmarkverordening	Referentie EU-Klimaatwet	Verwijzing naar betrokken datapunt
ESRS S4-1 Beleid ten aanzien van consumenten en eindgebruikers alinea 16	Indicator nr. 9 van tabel 3 en indicator nr. 11 van tabel 1 van bijlage I				270
ESRS S4-1 Niet-nakoming UNGP's on Business and Human Rights en OESO-richtlijnen alinea 17	Indicator nr. 10 van tabel 1 van bijlage I		Gedelegeerde Verordening (EU) 2020/1816, bijlage II; Gedelegeerde Verordening (EU) 2020/1818, art. 12, lid 1		270
ESRS S4-4 Mensenrechten-problemen en -incidenten alinea 35	Indicator nr. 14 van tabel 3 van bijlage I				275
ESRS G1-1 VN-Verdrag tegen corruptie alinea 10(b)	Indicator nr. 15 van tabel 3 van bijlage I				305
ESRS G1-1 Bescherming klokkenluiders alinea 10(d)	Indicator nr. 6 van tabel 3 van bijlage I				305
ESRS G1-4 Geldboeten voor overtredingen wetgeving tegen corruptie en omkoping alinea 24(a)	Indicator nr. 17 van tabel 3 van bijlage I		Gedelegeerde Verordening (EU) 2020/1816, bijlage II		314
ESRS G1-4 Normen bestrijding corruptie en omkoping alinea 24(b)	Indicator nr. 16 van tabel 3 van bijlage I				314

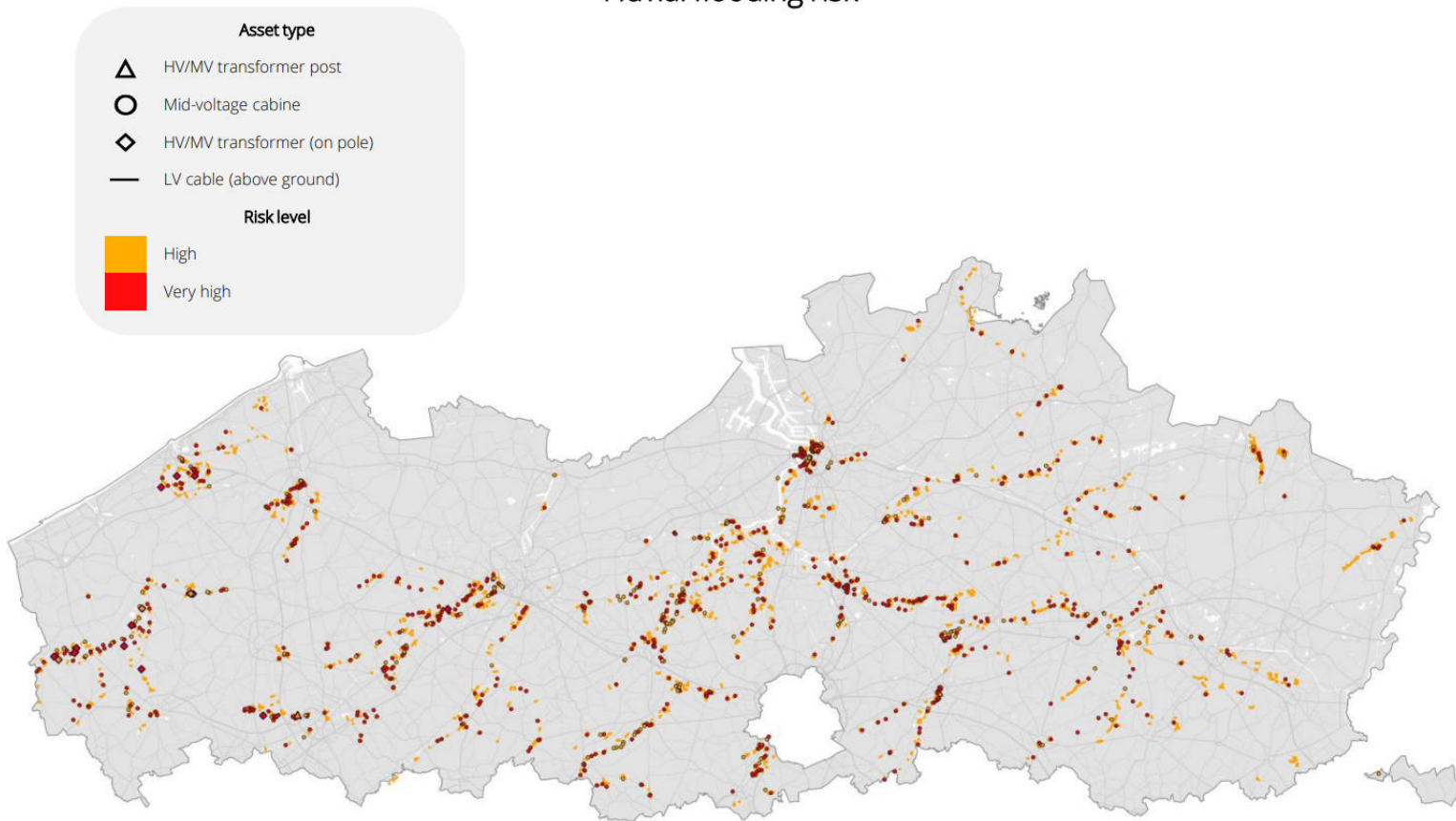
# Other annexes

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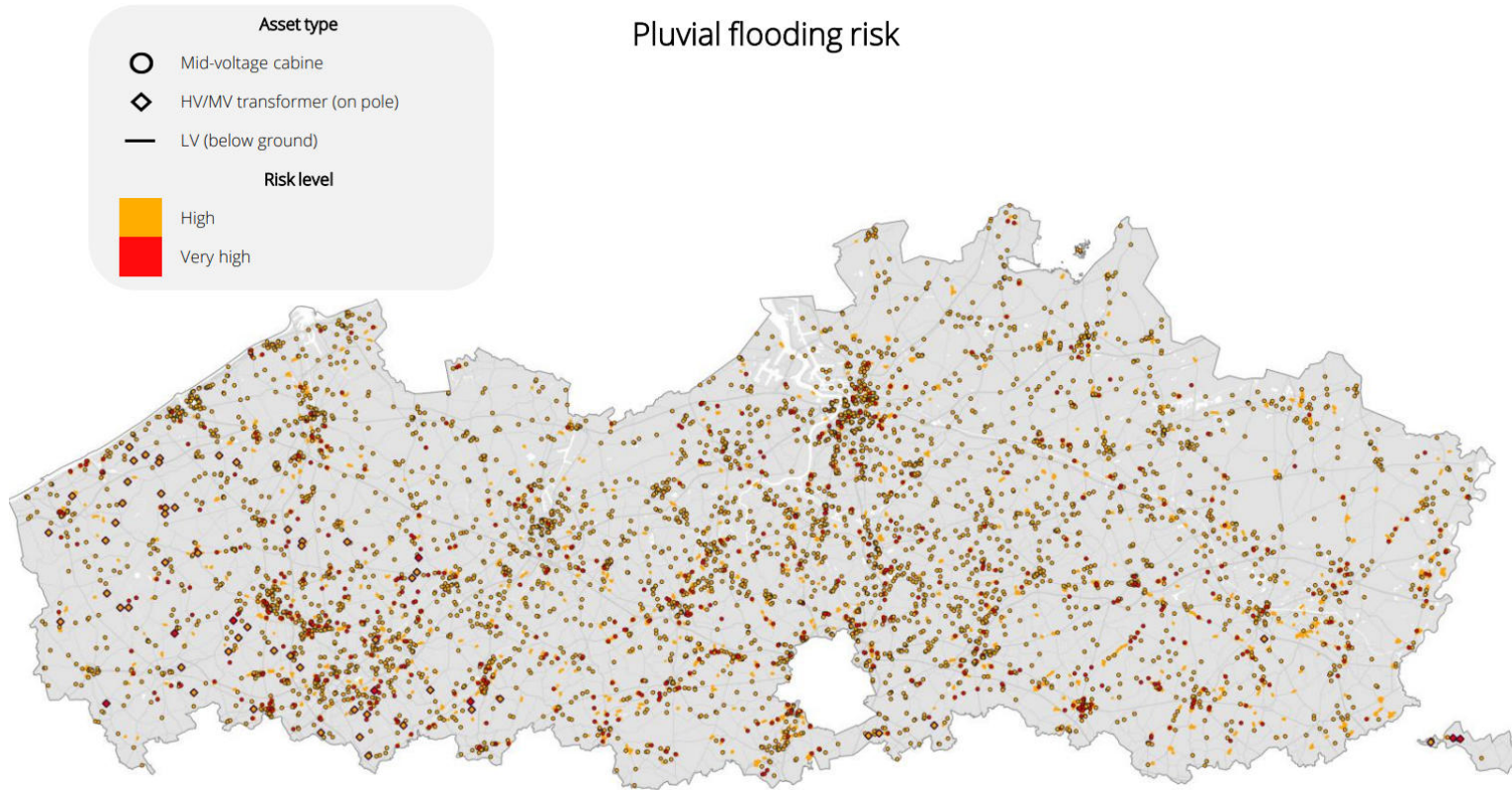
# Overview of asset locations with a high to very high physical climate risk

## Assets electricity

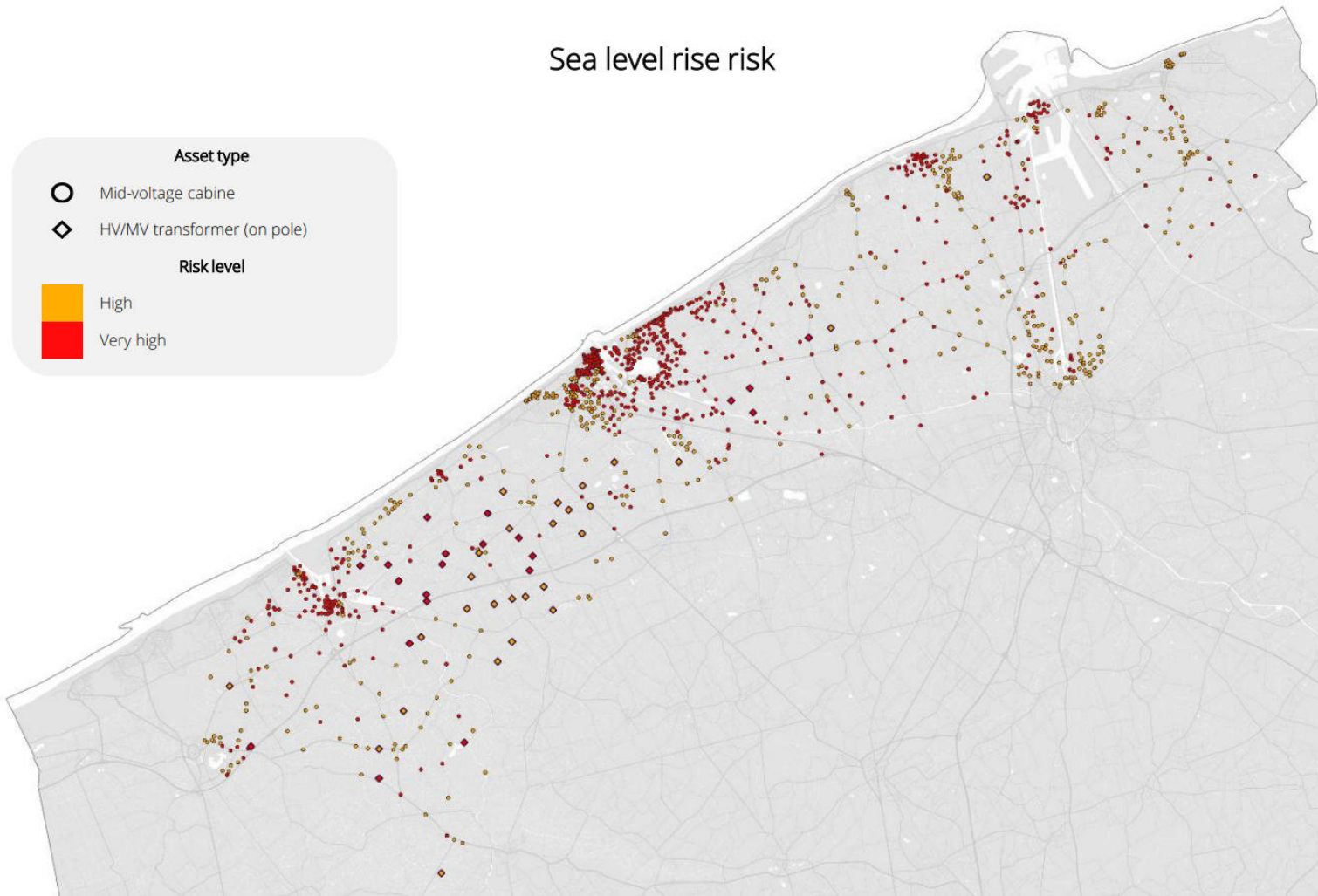
### Fluvial flooding risk



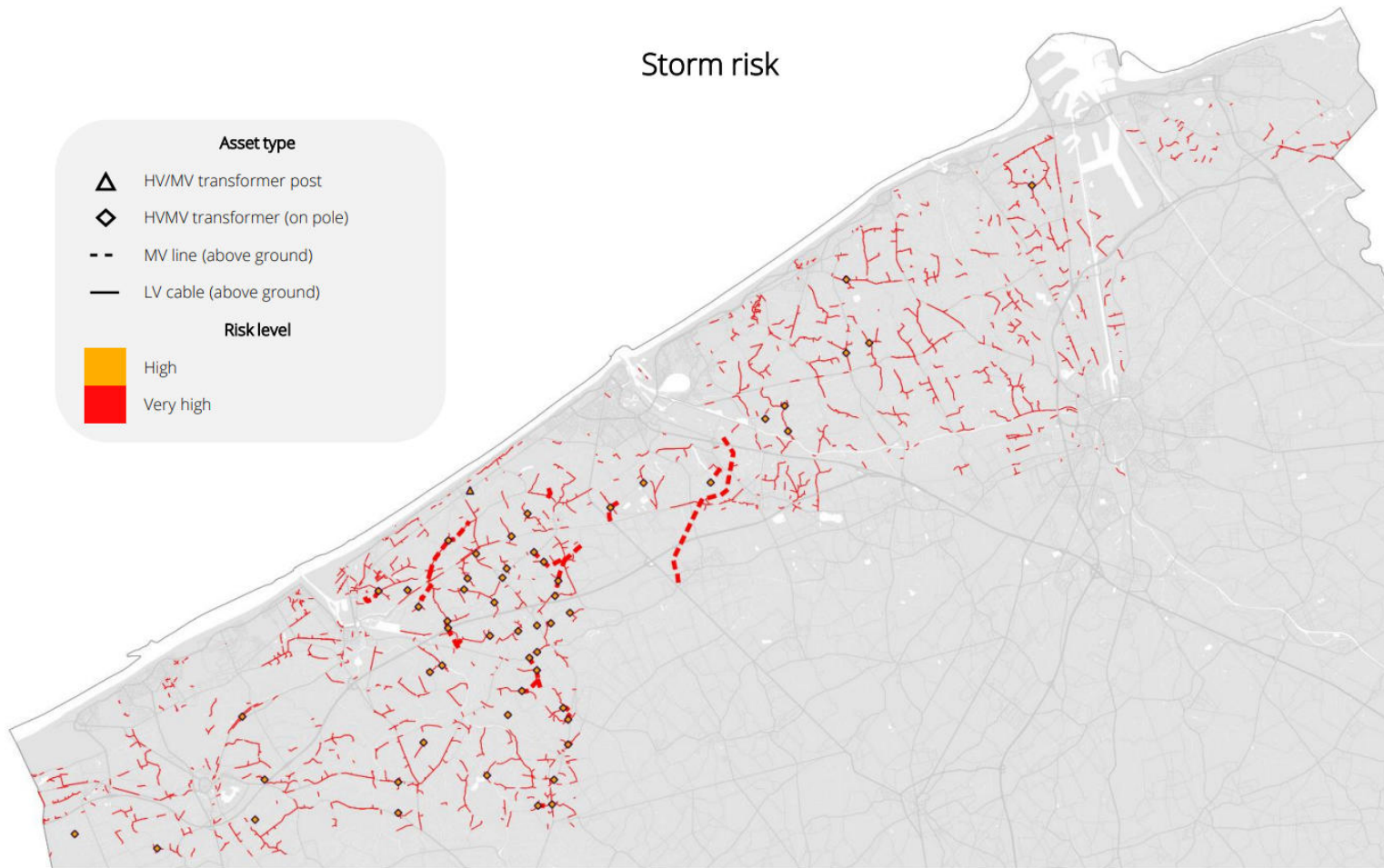
## Pluvial flooding risk



## Sea level rise risk



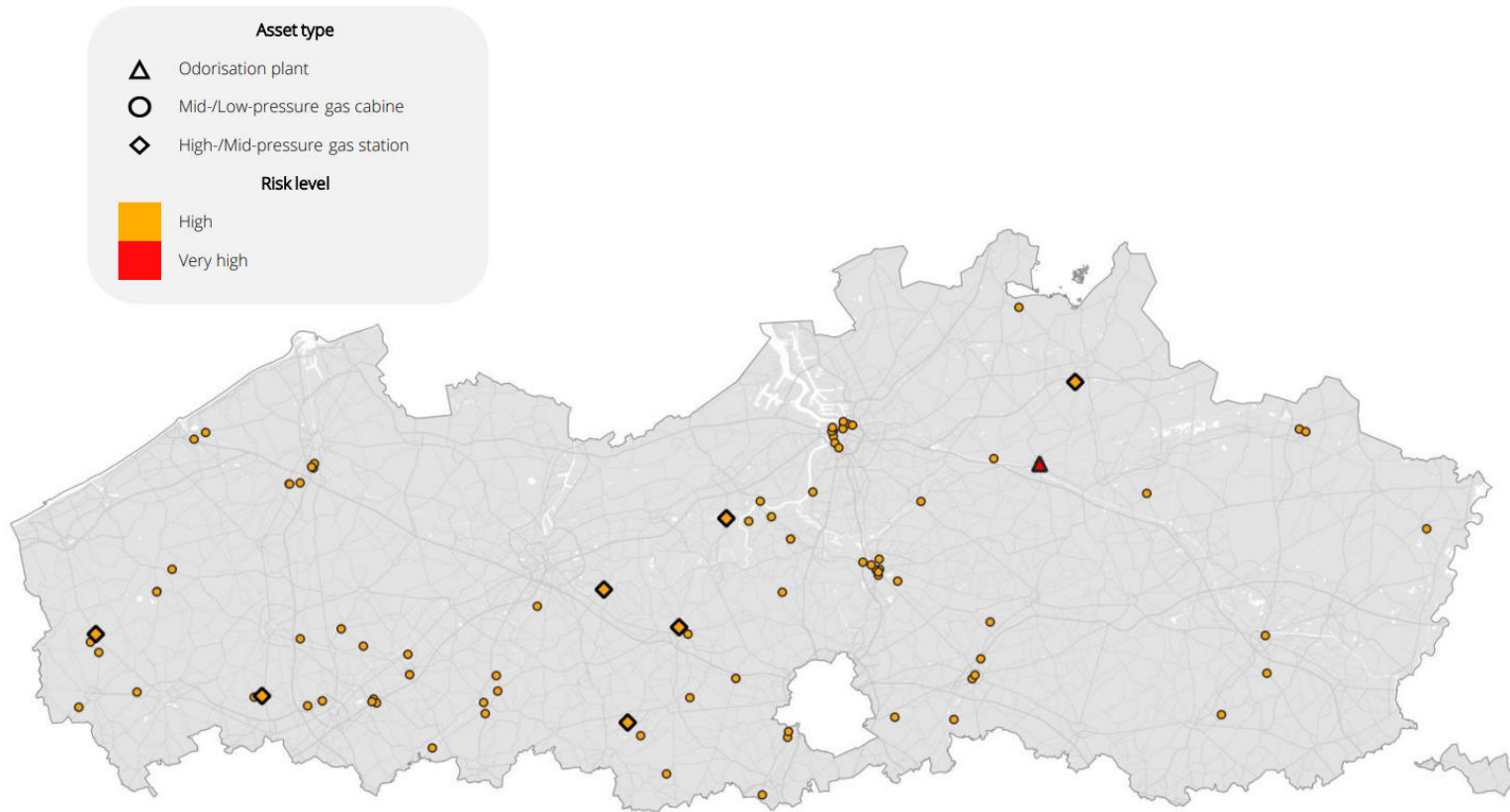
## Storm risk





## Assets gas

### Fluvial flooding risk



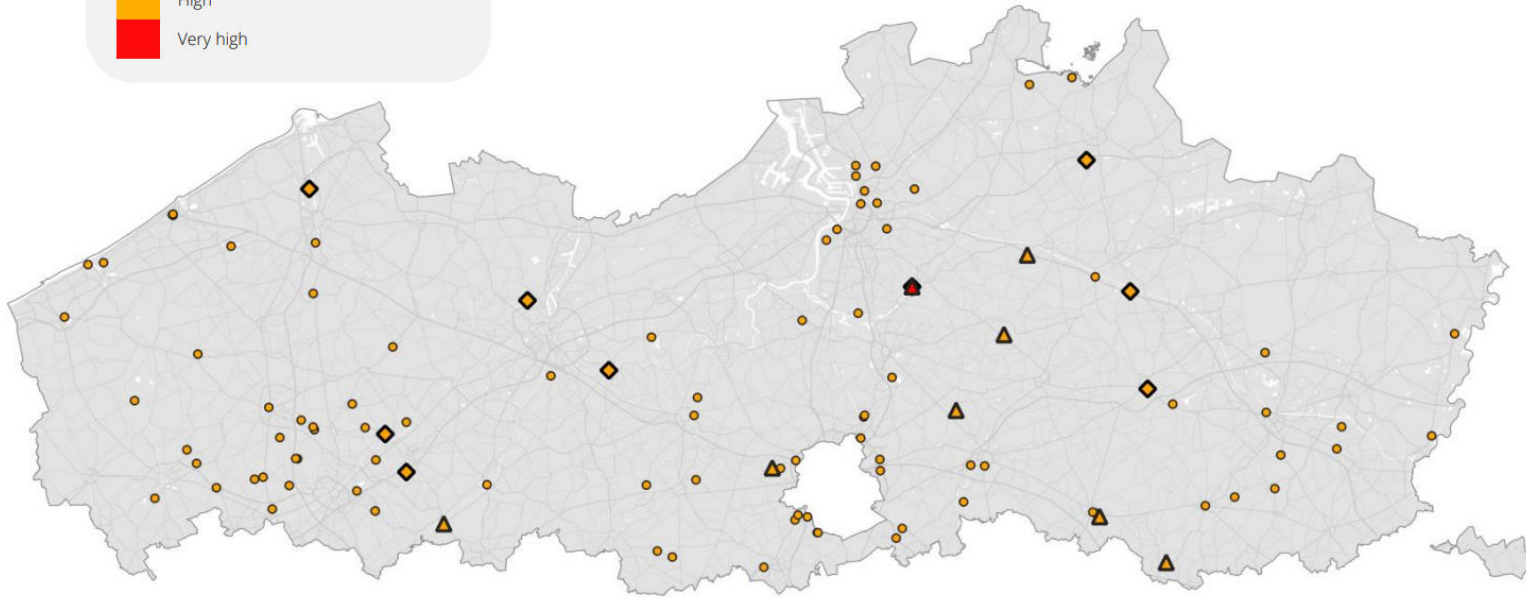
### Pluvial flooding risk

**Asset type**

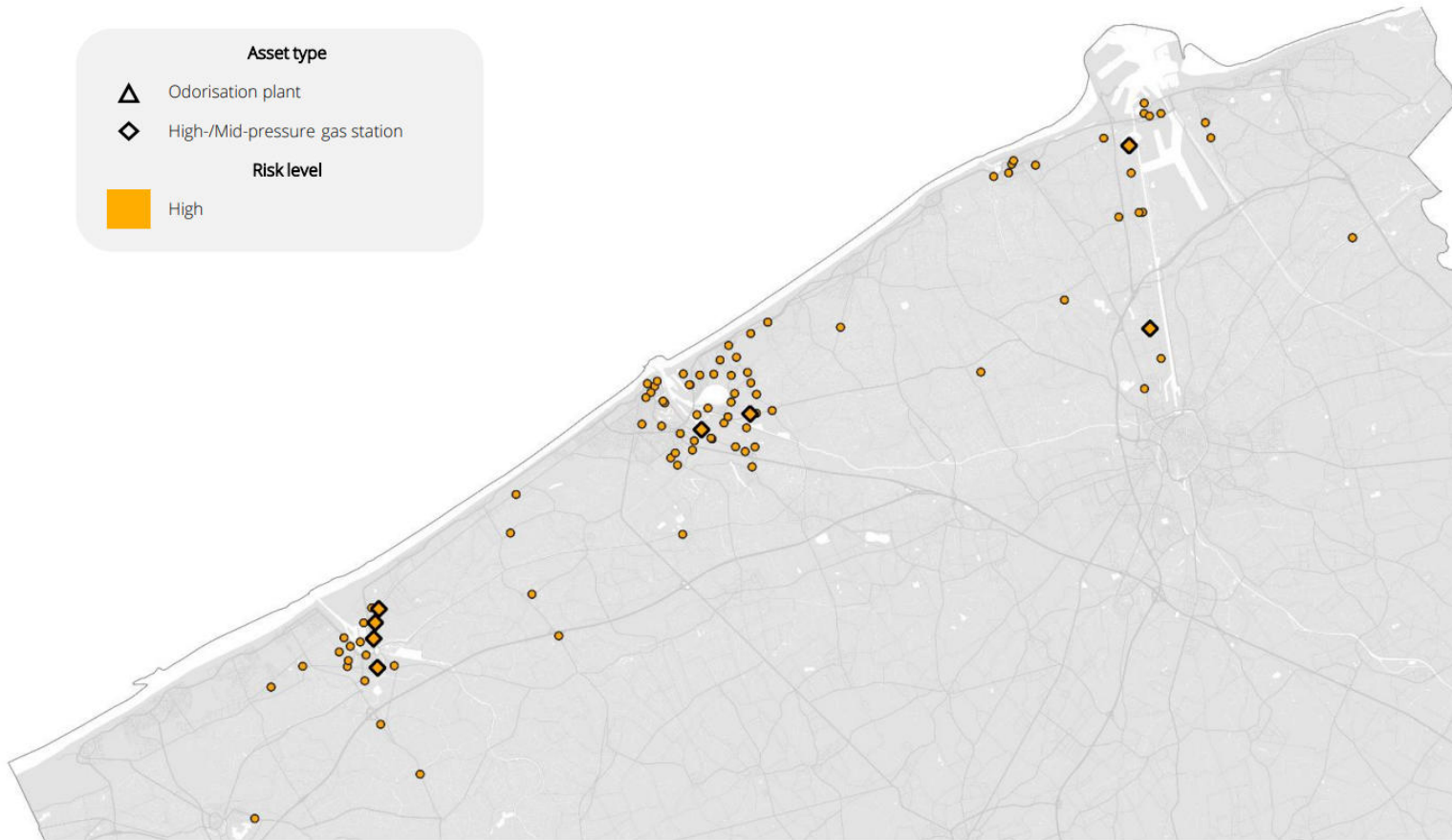
- △ Odourisation plant
- Mid-/Low-pressure gas cabine
- ◇ High-/Mid-pressure gas station

**Risk level**

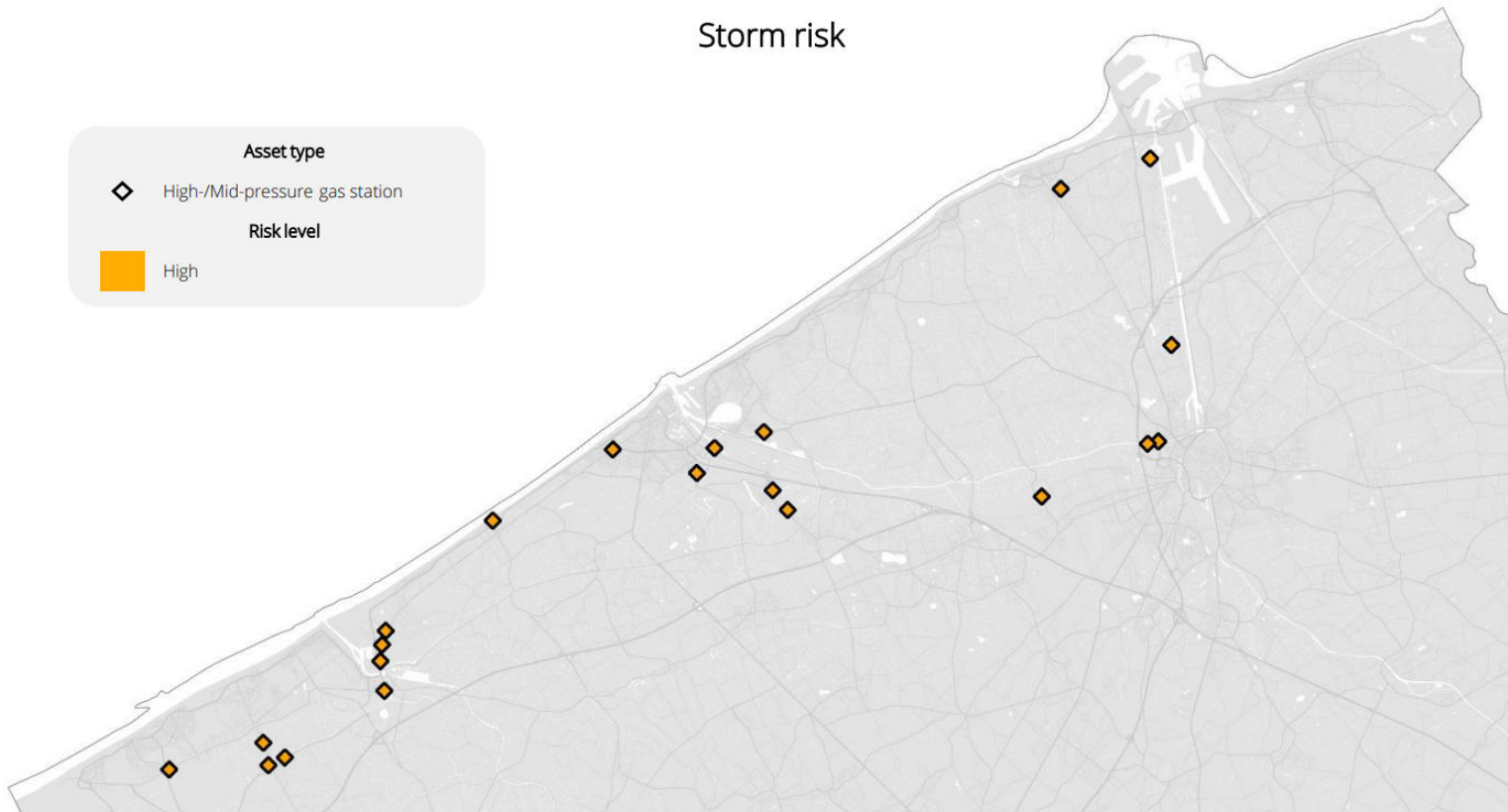
- High
- Very high



### Sea level rise risk

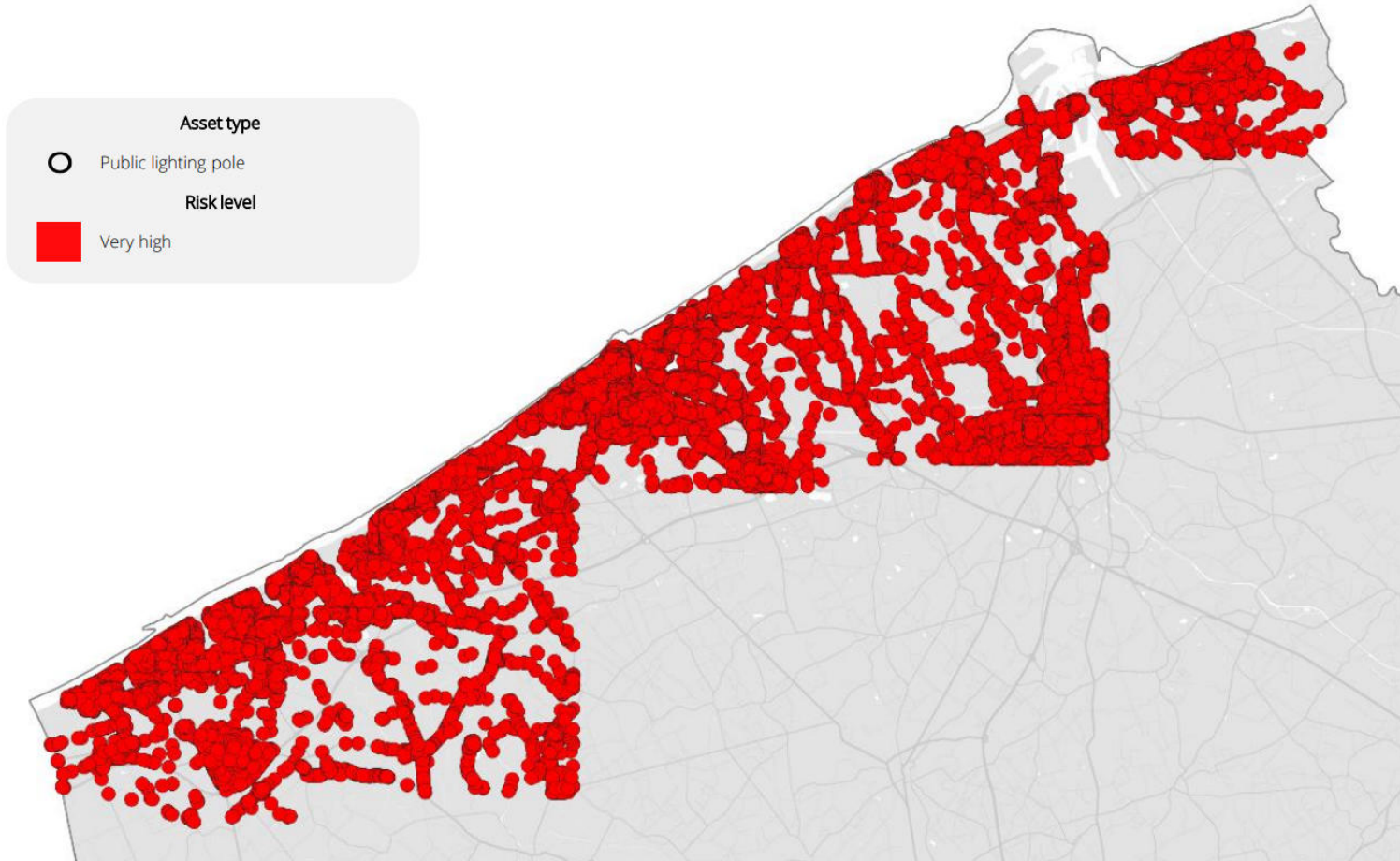


### Storm risk



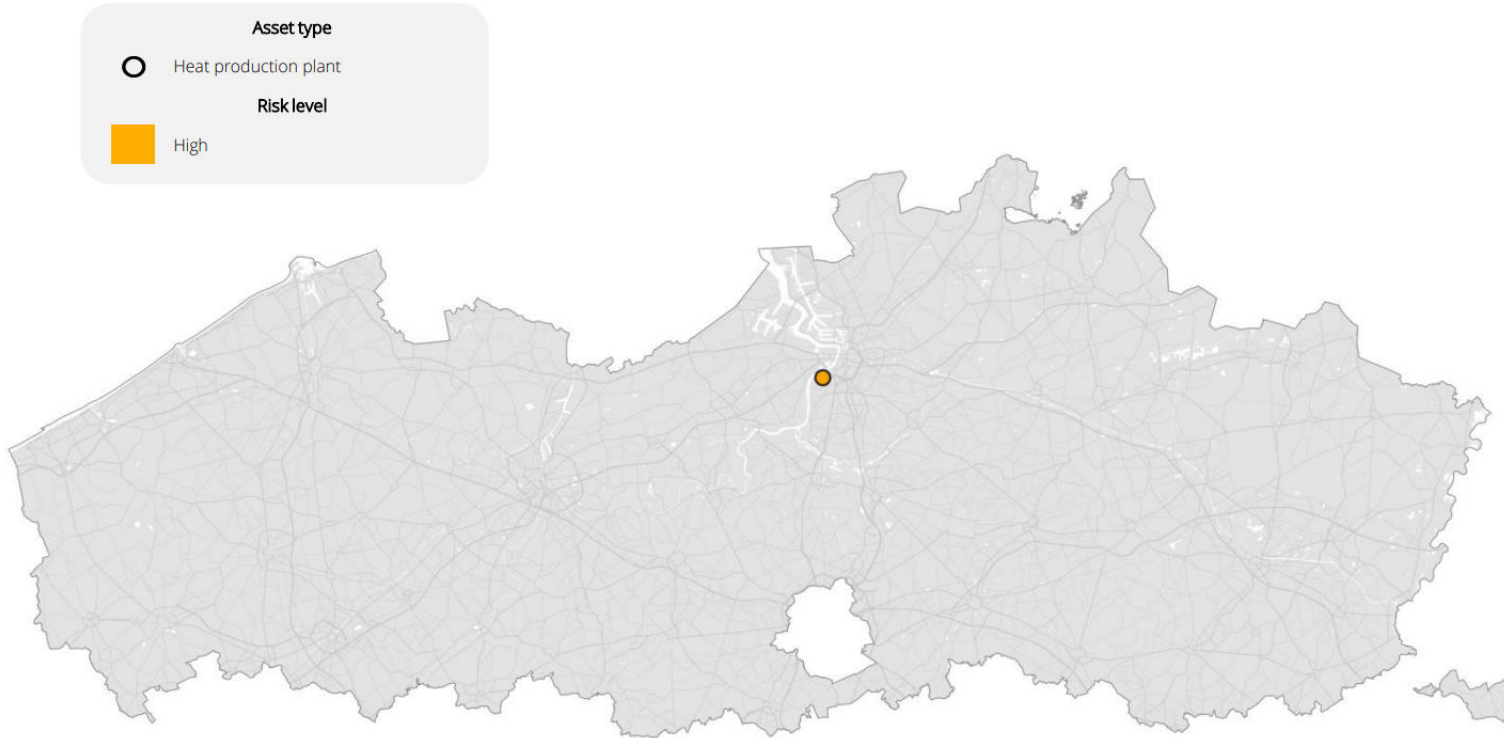
## Assets public lighting

### Storm risk



## Assets heat

### Fluvial flooding risk



## Assets sewerage

### Pluvial flooding risk



## Sea level rise risk





## Assets buildings

### Fluvial flooding risk




## Pluvial flooding risk

**Asset type**

 Administrative building

**Risk level**

 High



## Sea level rise risk

**Asset type**

 Administrative building

**Risk level**

 High



## Administrative information

- The company was founded on 29 April 2002, under the name Electrabel Netmanagement Flanders nv. Later, the name was changed to Electrabel Netten Vlaanderen nv. On 30 March 2006, the company's legal form and name were changed to Eandis cvba. From 1 January 2016, the company was renamed Eandis System Operator cvba.
- On 1 July 2018, a merger by acquisition was realised whereby Eandis System Operator cvba acquired sector partner Infracx cvba. The name of the merged company thus created was changed to Fluvius System Operator cvba from the same date.
- Legal form: cooperative society (CV) - this since 1 January 2020 following the revision of the various legal forms determined by the Companies and Associations Code dated 23 March 2019 (published in the Belgian Official Gazette on 4 April 2019)
- Company seat: Brusselsesteenweg 199 in 9090 Melle
- Company number 0477.445.084
- VAT number BE 0477.445.084 - RPR Ghent, Ghent division
- Website: [www.fluvius.be](http://www.fluvius.be)
- Correspondence address:  
Fluvius System Operator cv  
Brusselsesteenweg 199  
9090 Melle

## Contacts

- For all information and concrete actions related to meter readings, premiums, connections, setting up meters, investment works, social supplier services, defective street lamps and much more, please visit our website [www.fluvius.be](http://www.fluvius.be).
- Our website also offers you the possibility to ask a question via a contact form or to formulate a complaint.
- If you do not find an adequate answer via our website, you can contact us by telephone via the general number 078 35 35 34 on weekdays 8-20 hrs, on Saturdays 9-13 hrs.
- For urgent calls with permanence 24/7:
  - Gas odour: 0800 65 0 65
  - Malfunctions and defects: 078 35 35 00
- Speaking and hearing impaired people can report a gas odour, malfunctions and defects via SMS code message to 8635.
- Faulty street lights can be reported via [www.straatlampen.be](http://www.straatlampen.be) or in urgent cases also via the number 0800 6 35 35
- Fluvius Complaints Committee: via the website <https://www.fluvius.be/nl/thema/storingen-en-werken/klachten>

fluvius.