

## Art. 10 SFDR Disclosure

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### Swiss Life Funds (LUX) Global Infrastructure Opportunities III, a sub-fund of Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF (the "Sub-Fund")

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#### Summary

Swiss Life Funds (LUX) Global Infrastructure Opportunities III, a sub-fund of Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF (the "**Sub-Fund**") promotes environmental and social ("**E/S**") characteristics but does not have a sustainable investment objective. The Sub-Fund falls within the scope of Article 8 under the Sustainable Finance Disclosure Regulation (SFDR) of the EU.

The Sub-Fund promotes the following E/S characteristics: climate change mitigation and energy efficiency, health & safety, and diversity and equal opportunity.

It is the Sub-Fund's objective to generate attractive risk-adjusted returns by building a diversified portfolio of unlisted infrastructure and infrastructure-related assets and businesses ("**Infrastructure Investments**") located in OECD countries. As part of its investment strategy, the Sub-Fund applies a set of exclusion rules, integrates a proprietary ESG assessment and climate risk assessment into its investment and asset management processes, and aims to engage with investee companies to improve ESG standards and transparency throughout the holding period.

The ESG assessment includes an evaluation of good governance practices and incorporates sustainability indicators and principal adverse impact (PAI) indicators to monitor the attainment of the Sub-Fund's promoted E/S characteristics.

At least 90% of the Sub-Fund shall be comprised of investments that promote one or more of the Sub-Fund's E/S characteristics. The remaining 10% may be allocated to derivatives, cash, and cash equivalent held for operational reasons.

The attainment to the promoted E/S characteristics is measured, monitored, and evaluated using sustainability indicators associated with each individual investment. These indicators are detailed in the section "Monitoring of environmental or social characteristics" below.

The Sub-Fund uses a proprietary ESG assessment framework that combines quantitative and qualitative methodologies, including principal adverse impact indicators, custom sustainability metrics, and qualitative factors such as certifications and media checks. ESG indicators are assessed during investment due diligence and monitored throughout the holding period. Data validation steps in place ensure consistency and reliability, and any limitations are addressed through engagement and triangulation of sources.

ESG data for new investments is collected during due diligence by investment managers supported by external ESG advisors and the Sub-Fund's proprietary ESG assessment framework. During the holding period, the Sub-Fund collects ESG data directly from the portfolio companies. The data is reviewed by investment and asset managers, the ESG manager, and the ESG Committee Infrastructure Equity (ESG CIE) before being used for external reporting and monitoring.

No material methodological limitations have been identified. While data limitations may arise due to dependency on investee company disclosures, these are not considered material to the attainment of the Sub-Fund's E/S characteristics. The Sub-Fund addresses such limitations through active engagement and continuous improvement of ESG data collection processes.

As part of due diligence, the Sub-Fund applies binding exclusion rules, a proprietary ESG assessment, and a climate risk assessment. ESG ratings and principal adverse impact indicators are used to inform investment decisions, and investments not meeting the Sub-Fund's ESG standards are excluded. During the holding period, ESG performance is monitored annually, supported by structured data collection, control processes in place, and engagement with investee companies.

Engagement and active dialogue with investee companies is a core component of the Sub-Fund's ESG strategy. Engagement is tailored to the Sub-Fund's governance rights and investment strategy, and may include direct dialogue, board-level influence, or collaboration with other shareholders.

The Sub-Fund has not designated a specific index as a reference benchmark for the purpose of measuring the attainment of the promoted E/S characteristics.

## No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

## Environmental or social characteristics of the financial product

The Sub-Fund promotes the following E/S characteristics:

- Environmental: climate change mitigation and energy efficiency
- Social: health & safety and diversity and equal opportunity

## Investment strategy

The Sub-Fund invests in unlisted infrastructure and infrastructure-related assets and businesses (“**Infrastructure Investments**”) located in OECD countries. The Sub-Fund focuses on minority investments in the following industry sectors: energy (incl. renewable energy), transportation, oil, gas, social infrastructure, telecommunication as well as water / waste. However, the Fund may also consider majority investments and investments in other sectors.

As part of its investment and asset management processes, the Sub-Fund applies a set of exclusion criteria and integrates a comprehensive ESG and climate risk assessment across all new and existing investments. ESG considerations are embedded as binding elements of the investment strategy, influencing investment selection, monitoring, and engagement activities.

The ESG assessment includes a review of good governance practices of investee companies covering areas such as management quality, remuneration policies, anti-bribery and corruption history, health and safety standards, human rights policies, tax compliance, anti-money laundering and anti-bribery standards, and fair competition practices.

ESG performance improvement is a core objective of the Sub-Fund’s asset management activities. For each new investment, subject to influence and governance rights, ESG action points are defined during investment due diligence and are reviewed regularly throughout the holding period in collaboration with investee companies and co-investors. These ESG action plans are based on the Sub-Fund’s internal ESG assessment framework and aim to address material ESG topics.

Engagement is a key component of the Sub-Fund’s strategy to enhance ESG standards and transparency. The Sub-Fund monitors progress on ESG action points and encourages continuous improvement through active dialogue with portfolio companies.

Methodologies used for ESG and climate risk assessments are based on internal frameworks aligned with international standards. Data is sourced from investee disclosures and direct engagement, with limitations addressed through ongoing data quality reviews.

## Proportion of investments

At least 90% shall be comprised of investments that promote one or more environmental or social characteristics of the Sub-Fund.

The Sub-Fund can allocate the remaining 10% to derivatives, cash and cash equivalent positions, held for operational reasons. These are not measured against the E/S promoted by this Fund and there are no minimum environmental or social safeguards.

The Sub-Fund’s investments will generally be made either directly in operating companies or indirectly through subsidiaries or fund-like vehicles. These investments will primarily take the form of equity or equity-like investments, including convertible debt, silent participations, equity-like jouissance rights, profit participating loans and shareholder loans.

## Monitoring of environmental or social characteristics

The attainment of the promoted E/S characteristics is measured, monitored, and evaluated using the sustainability indicators listed below, which are applicable to each individual investment:

### Environmental Indicators

- Environmental management systems:
  - Share of investee companies with an environmental policy (in % of NAV)
  - Number of environmental pollution incidents
- Greenhouse gas emissions (“GHG emissions”):
  - Share of investee companies measuring GHG emissions (in % of NAV)
  - GHG emissions scope 1, scope 2, and scope 3 (in tCO<sub>2</sub>e)
- Energy:
  - Share of companies measuring renewable energy out of total energy consumption and production (in % of NAV)
  - Share of non-renewable energy out of total energy consumption and production (in %)
  - Energy intensity (energy consumption in GWh per million EUR of revenue)

## Social Indicators

- Health and Safety (“H&S”) management systems:
  - Share of investee companies with a H&S policy (in % of NAV)
  - H&S metrics (for employees and material contractors):
    - Total recordable injury frequency rate
    - Lost time injury frequency rate
    - Accident severity rate
- Diversity and equal opportunity:
  - Share of investee companies with a diversity and inclusion policy (in % of NAV)
  - Share of women among total employees
  - Share of women in management and supervisory bodies
  - Average unadjusted gender pay gap

Monitoring ESG practices of portfolio companies is a key element of the Sub-Fund’s investment and monitoring processes. The promoted E/S characteristics and associated sustainability indicators are tracked through the Sub-Fund’s internal ESG assessment framework.

For new investments, these indicators are assessed during investment due diligence and reviewed by the investment team and ESG Committee prior to submission to the Investment Committee. For existing investments, they are reviewed annually as part of the ESG monitoring process by the asset managers, ESG managers and the ESG Committee.

Data for the indicators is sourced directly from target and portfolio companies and verified by the investment and asset management teams. The quality and validity of the data are ensured through multiple layers of review and approval.

To improve performance of these indicators, asset managers aim to exercise shareholder engagement rights during the holding period. ESG engagements are tracked individually for each investment.

## Methodologies

The sustainability indicators used to monitor the attainment of the Sub-Fund’s promoted E/S characteristics are embedded within the Sub-Fund’s internal ESG assessment framework.

The Sub-Fund applies a combination of quantitative and qualitative methodologies to assess ESG performance, including: principal adverse impacts on sustainability factors as defined under SFDR, custom sustainability indicators, and qualitative considerations such as but not limited to ISO certifications, negative media exposure, community engagement.

Each indicator is assessed during investment due diligence and monitored throughout the holding period.

The methodology also incorporates data validation steps to ensure consistency and reliability. Limitations may arise due to data availability, quality, or comparability across investee companies. These are addressed through triangulation of data sources and engagement with portfolio companies to improve disclosure.

For further details on how these methodologies are applied during investment selection and monitoring, please refer to the “Due Diligence” section below.

## Data sources and processing

The Sub-Fund promotes transparency and aims to improve ESG standards of investee companies through active engagement during the holding period, subject to governance rights and influence.

### a) Data sources

All data used to monitor the attainment of the Sub-Fund’s promoted E/S characteristics is collected directly from portfolio companies on an annual basis. For new investments, data is sourced from target companies with support of external advisors during investment due diligence. No third-party ESG data providers are used for primary data collection.

In addition, the Sub-Fund employs an external ESG data management platform to support the data collection process. This platform provides a structured, IT-driven solution that facilitates consistent data input across portfolio companies and enhances transparency. It also enables multi-year data comparisons, allowing asset managers to identify trends and request clarifications or corrections directly through the platform.

### b) Data quality controls

Investment and asset managers are responsible for verifying the accuracy and completeness of the data received from target and investee companies. When it comes to fund reporting, verified data is then submitted to the ESG manager who aggregates and reviews it at the portfolio level under a four-eye principle. The external ESG data platform further supports data quality by enabling side-by-side year-on-year comparisons, flagging inconsistencies, and tracking changes. This multi-step structured review process ensures consistency, reliability,

and traceability of ESG data. Where data gaps are identified, especially in early-stage companies, the Sub-Fund engages directly with investee companies to improve data quality and completeness.

c) Data processing

Depending on the sustainability indicator, data may be:

- Absolute, as reported by the portfolio companies (e.g. number of environmental incidents or GHG emissions in tCO<sub>2</sub>e),
- Relative, as reported by the portfolio companies (e.g. share of women among total employees and in management and supervisory bodies), or
- Derived, using internal methodology when data delivered by the portfolio companies is binary (e.g. share of investee companies with a policy, expressed as % of NAV).

The ESG manager processes and consolidates the data into the Sub-Fund's ESG reporting framework which supports monitoring, benchmarking, and engagement activities.

d) Proportion of estimated data

The Sub-Fund does not rely on estimated data for its ESG reporting. All investee companies are required to report directly on the set indicators used to monitor the promoted E/S characteristics. However, depending on the maturity of the investee company, data gaps may occur – particularly for complex indicators such as GHG emissions. In such cases, the Sub-Fund engages with the investee company to close the gap within a reasonable timeframe and to support the institutionalization of ESG data collection and reporting.

### Limitations to methodologies and data

a) Methodological limitations

No material methodological limitations have been identified in the Sub-Fund's ESG assessment framework. The methodologies applied are based on internally developed ESG evaluation models, supported by structured data collection and validation processes.

b) Data limitations

The Sub-Fund relies primarily on data provided directly by target and portfolio companies. Limitations may arise due to the maturity of the investee company, lack of established ESG reporting processes, or delays in data submission due to operational priorities. These limitations are most common in early-stage companies or those undergoing institutionalization of ESG practices.

To mitigate these limitations, the Sub-Fund employs an external ESG data management platform that supports structured data collection, enables multi-year comparisons, and facilitates direct communication between asset managers and investee companies. This platform allows asset managers to request data reviews and corrections, improving both the accuracy and completeness of reported information.

Asset managers also engage actively with investee companies and co-investors throughout the holding period to close data gaps and support the development of robust ESG reporting processes.

c) Effects of limitations

None of the identified limitations are considered to materially affect the Sub-Fund's ability to attain the E/S characteristics it promotes.

This assessment is based on the Sub-Fund's robust ESG governance and monitoring processes, including the use of a structured ESG assessment framework, annual reassessments, and a three-line control mechanism involving asset managers, ESG managers, and the ESG Committee.

In addition, the Sub-Fund employs an external ESG data management platform to enhance data quality and comparability. It also aims to engage with investee companies to close data gaps. These measures ensure that any limitations in data availability or maturity are addressed in a timely and effective manner, preserving the integrity of the ESG evaluation and the Sub-Fund's alignment with its promoted E/S characteristics.

### Due diligence

#### Pre-investment stage

#### Exclusions

The Sub-Fund applies a set of exclusion rules ("exclusions") to meet legal requirements and to embody ESG considerations in risk management. Investments in sectors or activities that conflict with the Sub-Fund's promoted E/S characteristics are excluded. These exclusions are binding and form a core part of the investment decision-making process.

- In addition to the regulatory controversial weapons exclusions, the Sub-Fund will not grant financing to any business involved in manufacturing or selling biological, chemical, anti-personal, and cluster weapons and/or in the production of the nuclear warheads of nuclear weapons and/or companies listed under SVVK-ASIR Nuclear Weapons (outside NPT);
- Not to grant financing for more than 20% of the fund's size to projects that are primarily active in the oil midstream sector (i.e. in the business of transporting, storing or refining crude oil or related refined products);

- Not to grant financing to any business that derives more than 10% of its value from oil and gas exploration and production (it does not include renewable fuels and gas);
- Not to grant financing to any business that derives more than 10% of its value from handling or burning coal or a revenue of more than 10% from mining or selling thermal coal;
- Not to grant financing to any business that derives more than 10% of its value from nuclear power production;
- Not to grant financing to any business which is failing at least one of the ten UNGC principles according to the MSCI ESG list or in case of any identified violation during the ESG due diligence for which no remediation actions are possible<sup>1</sup>;
- Not to grant financing to any business that produces, makes use of, or trades in hazardous materials such as radioactive materials, unbounded asbestos fibres, and products containing PCBs. For radioactive materials, this does not apply to the procurement of medical equipment, quality control equipment or other application for which the radioactive source is insignificant and/or adequately shielded;
- Not to grant financing to any business conducting cross-border trade in waste and waste products unless the activity is compliant with the Basel Convention and the underlying regulations;
- Not to grant financing to any business producing or trading pharmaceutical, pesticide/herbicide, chemical, or ozone depleting substances and other hazardous substances subject to international phase-outs or bans;
- Not to grant financing to any business destroying critical habitats. Critical habitats refer to specific areas occupied by species that contain the physical or biological features that are essential to the conservation of endangered and threatened species and that may need special management or protection;
- Not to grant financing to any business that is directly involved in or sources from suppliers involved in destruction of tropical natural forests or high nature value forests that are protected by national and international conservation laws and policies;
- Not to grant financing to any business that is directly involved in tobacco farming, production, and supplying;
- Not to grant financing to any business that is directly involved in gambling, casinos, and equivalent enterprises, or hotels hosting casinos with substantial revenues from them.
- Not to grant financing to any business that relates to pornography or prostitution.

#### **ESG assessment and PAI assessment**

The investment team conducts a structured ESG assessment to evaluate the environmental, social, and governance performance of each target company or asset. This assessment includes twelve key ESG topics and results in an internal ESG rating. The ESG assessment consists of 48 standardized questions across twelve key topics, covering environmental practices, social responsibility, and governance structures. Each question is answered using a predefined format (Yes/No/Not applicable/Information not available), and the responses generate an ESG rating on a scale from 0 to 48. This rating is interpreted using a traffic light system: scores above 32 indicate strong ESG risk management, scores between 26 and 32 reflect moderate management, and scores below 26 suggest low management of ESG risks. The ESG rating is integrated into the investment recommendation.

The ESG assessment incorporates sustainability indicators used to monitor the Sub-Fund's promoted E/S characteristics and includes consideration of PAIs on sustainability factors. Where disclosure on PAIs is unavailable, a discount is applied to the ESG rating, and the investment recommendation is adjusted to include actions aimed at procuring relevant data post-investment.

#### **Climate risk assessment**

A climate risk assessment aligned with the TCFD framework is conducted alongside the ESG assessment. Transitional risks are evaluated under the SSP1-1.9 scenario (Paris-aligned) assessing both likelihood and impact across categories such as policy, legal, technology, and market risks. Physical climate risks are assessed using an external climate risk tool is being used, covering both present hazard risk and future climate risk under multiple climate scenarios (SSP1-2.6, SSP2-4.5, SSP5-8.5). Material risks identified during due diligence trigger the development of mitigation or adaptation measures.

#### **Good governance practices**

The ESG assessment includes a review of good governance practices, covering areas such as board structure, senior management, financial reporting, compliance with tax and anti-corruption standards, and stakeholder engagement. These elements are evaluated to ensure alignment with SFDR expectations.

#### **Decision thresholds and action plans**

The ESG CIE reviews the ESG assessment of every new investment opportunity prior to its presentation to the Investment Committee.

Investments identified as having medium or low management of ESG risks through the ESG assessment must be accompanied by an ESG Action Plan. The plan should take into account the Sub-Fund's ability to influence the investee company and outline post-investment measures to improve ESG performance.

Investment with low management of ESG risks and no binding, enforceable ESG Action Plan will be excluded. The Sub-Fund also excludes investments that are not aligned with the E/S characteristics it promotes.

<sup>1</sup> Note: Infrastructure Equity distinguishes the assessment of UNGC violations between direct investments and material counterparties. Furthermore, this evaluation is segmented into pre-investment and post-investment phases to ensure a comprehensive analysis, according to the internal policy.

### **Asset management stage**

During the holding period, the Sub-Fund performs the following key ESG-related activities to ensure continued alignment with its promoted E/S characteristics:

#### **Sustainability indicators reporting**

The Sub-Fund collects sustainability indicators for each portfolio investment and aggregates them at the Sub-Fund level. These indicators are disclosed annually in accordance with SFDR periodic disclosure.

#### **ESG and PAIs assessment**

Asset managers monitor each asset throughout the holding period. An annual ESG assessment is conducted for each investment, including a reassessment of its ESG rating. This ESG assessment integrates the PAI assessment. A Fund-level PAI assessment is performed annually.

The main goal of this assessment is to provide transparency, highlight ESG performance, and improve the ESG standards of investee companies through direct engagement, subject to governance rights and influence.

### **Control mechanisms**

ESG data for new investments is sourced directly from target companies and reviewed by external advisors during due diligence. These advisors support investment managers and perform initial data quality checks (first line of defense).

Investment managers, often with the support of the ESG manager and the ESG advisor, review the due diligence findings and raise questions as needed (second line of defense). The investment managers finalize the ESG assessment and ESG investment recommendation which includes, among other elements, an evaluation of the investment's compliance with the Sub-Fund's regulatory ESG commitments.

Summarized ESG findings are submitted to the ESG CIE prior to Investment Committee review. The ESG CIE acts as the final line of defense and its approval of the ESG assessment is documented in the investment memo.

For existing investments, ESG data is sourced directly from portfolio companies and verified by asset managers, who are in close contact with the companies and best positioned to assess data quality (first line of defense). The Sub-Fund uses an external ESG data management platform to support the ESG monitoring process. This platform enables structured data collection, multi-year comparisons, and facilitates communication between asset managers and investee companies to improve data quality and completeness.

Verified data and ESG assessments are submitted to the ESG manager, who aggregates and reviews them at the portfolio level. Any material discrepancy identified is double-checked with asset managers and portfolio companies (second line of defense).

Final ESG reporting, including SFDR periodic disclosures, is presented to the ESG CIE providing a third line of defense to ensure reliability and transparency in monitoring the Sub-Fund's E/S characteristics.

### **Engagement policies**

The implementation of ESG-related actions and processes aimed at improving the ESG performance of investee companies is governed by the Sub-Fund's approach to shareholder engagement. Engagement is also used to address sustainability-related controversies where they arise.

Engagement can take various forms, is taken in the interest of the investors and is tailored to the Sub-Fund's ability to influence ESG outcomes.

Engagement is subject to the type of investment, governance rights, or size of shareholding. For assets where the Sub-Fund holds control or co-control positions, board representation, and/or veto rights at board level (Tier 1 assets), a proactive engagement approach is implemented. This includes direct dialogue with management and board members to drive ESG improvements where deemed necessary. For Tier 2 and Tier 3 assets where governance rights are limited or non-existent, engagement may be more constrained or not feasible. In such cases, asset managers seek to engage constructively with lead shareholders or other key stakeholders, focusing on sustainability issues and promoting transparency and accountability.

The Sub-Fund's engagement policy includes documentation, monitoring and reporting of engagement activities. Where engagement efforts do not result in satisfactory progress, escalation measures may be considered.

### **Designated reference benchmark**

The Sub-Fund has not designated a specific index as a reference benchmark for the purpose of measuring attainment with the promoted E/S characteristics.

**Additional documentation and information:**

The periodic reporting of Swiss Life Funds (LUX) Global Infrastructure Opportunities III, a sub-fund of Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF (including the SFDR period annex) as well as its confidential private placement memorandum (including the SFDR precontractual annex) are available from Swiss Life Asset Managers Luxembourg, the alternative investment fund manager of Swiss Life Funds (LUX) Global Infrastructure Opportunities III, a sub-fund of Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF. This information is sent within one week on the investor's written request to Swiss Life Investor Services, Swiss Life Asset Managers Luxembourg, 4a, rue Albert Borschette, L-1246 Luxembourg; by email to [investor-services@swisslife-am.com](mailto:investor-services@swisslife-am.com), or by telephone on +3522675850. These contact details can also be used to request further information if necessary.

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## Art. 10 i Disclosure-forordningen (SFDR) for Art. 8-produkter

(Ikrafttrædelsesdato den 12.01.2026)

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*Swiss Life Funds (LUX) Global Infrastructure Opportunities III, en afdeling af Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF ("fonden")*

LEI: 254900WHZFCHQVAD9J56

### Sammenfatning

Swiss Life Funds (LUX) Global Infrastructure Opportunities III, en afdeling af Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF ("afdelingen") fremmer miljømæssige og sociale ("E/S") karakteristika, men har ikke bæredygtig investering som mål. Afdelingen er omfattet af artikel 8 i EU's forordning om bæredygtig finansiering (disclosureforordningen).

Afdelingen fremmer følgende E/S-karakteristika: modvirkning af klimaændringer, energieffektivitet, sundhed og sikkerhed, diversitet og lige muligheder.

Det er afdelingens mål at generere attraktive, risikojusterede afkast gennem opbygning af en diversificeret portefølje af unoterede infrastruktur- og infrastrukturelle aktiver og virksomheder ("infrastrukturinvesteringer") beliggende i OECD-lande. Som led i investeringsstrategien anvender afdelingen et sæt udelukkelsesregler, integrerer en proprietær ESG-vurdering og en klimarisikovurdering i sine investerings- og kapitalforvaltningsprocedurer og stiler efter dialog med sine investeringsmodtagende virksomheder for at forbedre deres ESG-standarder og gennemsnitlighed i hele investeringsperioden.

ESG-vurderingen omfatter en evaluering af god ledelsespraksis og inddrager bæredygtighedsindikatorer og indikatorer for vigtigste negative virkninger (PAI) for at overvåge, om de E/S-karakteristika, som afdelingen fremmer, opnås.

Mindest 90 % af afdelingen skal bestå af investeringer, der fremmer et eller flere af afdelingens E/S-karakteristika. De resterende 10 % kan allokeres til derivater, kontanter og andre likvide midler, der besiddes af driftsmæssige årsager.

Hvorvidt de M/S-karakteristika, som fonden fremmer, er opnået, måles, overvåges og evalueres ved hjælp af de bæredygtighedsindikatorer, som kan knyttes til hver enkelt investering. Disse indikatorer er beskrevet nærmere i nedenstående afsnit "Overvågning af miljømæssige eller sociale karakteristika".

Afdelingen anvender en proprietær ESG-vurderingsramme, der kombinerer kvantitative og kvalitative metoder, herunder indikatorer for vigtigste negative virkninger, tilpassede bæredygtighedsparametre og kvalitative faktorer såsom certificeringer og mediekontrol. ESG-indikatorer vurderes under investerings due diligence og overvåges gennem hele investeringsperioden. De implementerede datavalideringstrin sikrer konsistens og pålidelighed, og eventuelle begrænsninger håndteres gennem aktivt ejerskab og triangulering af kilder.

Investeringsforvalterne indsamler ESG-data for nye investeringer i forbindelse med due diligence, der støttes af eksterne ESG-rådgivere og afdelingens proprietære ESG-vurderingsramme. I løbet af investeringsperioden indsamler afdelingen ESG-data direkte fra porteføljeselskaberne. Dataene gennemgås af investerings- og kapitalforvaltere sammen med ESG-forvalteren og ESG-komiteen "Committee Infrastructure Equity" (ESG CIE), inden dataene anvendes til ekstern rapportering og overvågning.

Der er ikke fundet væsentlige metodebegrænsninger. Der kan opstå begrænsninger i dataene på grund af afhængighed af de investeringsmodtagende selskabers oplysninger, men disse anses ikke for at være væsentlige for at opnå afdelingens E/S-karakteristika. Afdelingen håndterer sådanne begrænsninger gennem aktivt ejerskab og løbende forbedring af ESG-dataindsamlingsprocedurerne.

Som led i due diligence anvender afdelingen bindende udelukkelsesregler, en proprietær ESG-vurdering og en klimarisikovurdering. ESG-vurderinger og indikatorer for vigtigste negative virkninger anvendes til at træffe informerede investeringsbeslutninger, og investeringer, der ikke opfylder afdelingens ESG-standarder, udelukkes. I løbet af investeringsperioden overvåges ESG-resultaterne årligt, understøttet af struktureret dataindsamling, implementerede kontrolprocesser og aktivt ejerskab med de virksomheder, der investeres i.

Aktivt ejerskab og aktiv dialog med investeringsmodtagende virksomheder er en central del af afdelingens ESG-strategi. Aktivt ejerskab tilpasses efter afdelingens ledelsesrettigheder og investeringsstrategi og kan omfatte direkte dialog, indflydelse på bestyrelsesniveau eller samarbejde med andre investorer.

Afdelingen har ikke udpeget et specifikt indeks som referencebenchmark med henblik på at måle, hvorvidt de E/S-karakteristika, som fonden fremmer, er opnået.

## **Nachhaltigkeitsbezogene Offenlegung gemäß Artikel 10 der Offenlegungsverordnung (Sustainable Finance Disclosure Regulation, SFDR) für Produkte gemäß Art. 8**

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*Swiss Life Funds (LUX) Global Infrastructure Opportunities III, ein Teilfonds von Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF (der „Fonds“)*

*Unternehmenskennung (LEI-Code): 254900WHZFCHQVAD9J56*

### **Zusammenfassung**

Swiss Life Funds (LUX) Global Infrastructure Opportunities III, ein Teilfonds von Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF (der „Teilfonds“) bewirbt ökologische und soziale Merkmale, verfolgt aber kein nachhaltiges Investitionsziel. Der Teilfonds fällt in den Anwendungsbereich von Artikel 8 der EU-Offenlegungsverordnung (SFDR).

Der Teilfonds bewirbt die folgenden ökologischen/sozialen Merkmale: Klimaschutz und Energieeffizienz, Gesundheit und Sicherheit sowie Vielfalt und Chancengleichheit.

Der Teilfonds strebt die Generierung attraktiver risikobereinigter Renditen an, indem er ein diversifiziertes Portfolio von nicht-börsennotierten Infrastruktur- und infrastrukturbezogenen Vermögenswerten und Unternehmen („Infrastrukturinvestitionen“) aufbaut, die in OECD-Mitgliedstaaten angesiedelt sind. Im Rahmen seiner Anlagestrategie wendet der Teilfonds eine Reihe von Ausschlussregeln an, berücksichtigt eine interne ESG-Bewertung und eine Bewertung des Klimarisikos in seinen Anlage- und Vermögensverwaltungsprozessen und will mit den Unternehmen, in die er investiert, einen aktiven Dialog führen, um eine Verbesserung von ESG-Standards und Transparenz während der Haltedauer zu erreichen.

Die ESG-Bewertung umfasst eine Bewertung der Verfahrensweisen einer guten Unternehmensführung und beinhaltet Nachhaltigkeitsindikatoren und Indikatoren für die wichtigsten nachteiligen Auswirkungen (Principal Adverse Impacts, PAI), um die Erfüllung der vom Teilfonds beworbenen ökologischen/sozialen Merkmale zu überwachen.

Mindestens 90% des Teilfonds müssen auf Investitionen entfallen, die ein oder mehrere ökologische/soziale Merkmale des Teilfonds bewerben. Die übrigen 10% können Allokationen in Derivaten, Barmitteln und Barmitteläquivalenten umfassen, die aus operativen Gründen gehalten werden.

Die Messung, Überwachung und Beurteilung der Erfüllung der ökologischen/sozialen Merkmale erfolgt anhand von Nachhaltigkeitsindikatoren in Bezug auf jede einzelne Investition. Diese Indikatoren sind im Abschnitt „Überwachung der ökologischen oder sozialen Merkmale“ ausführlich dargelegt.

Der Teilfonds verwendet einen internen ESG-Bewertungsrahmen, der quantitative und qualitative Methoden kombiniert, darunter die Berücksichtigung der wichtigsten PAI-Indikatoren, kundenspezifischer Nachhaltigkeitskennzahlen und qualitativer Faktoren wie Zertifizierungen und Medienprüfungen. Die ESG-Indikatoren werden während der Sorgfaltsprüfung der Investitionen bewertet und während der gesamten Haltedauer überwacht. Die vorhandenen Schritte zur Validierung von Daten gewährleisten Konsistenz und Zuverlässigkeit, und etwaige Einschränkungen werden durch Mitwirkung und Quellen-Triangulation ausgeglichen.

ESG-Daten für neue Investitionen werden im Zuge der Sorgfaltsprüfung von Anlageverwaltern gesammelt; unterstützend werden die Analysen externer ESG-Berater und der teilfondseigene ESG-Bewertungsrahmen herangezogen. Während der Haltedauer bezieht der Teilfonds die ESG-Daten unmittelbar von den Portfoliounternehmen. Die Daten werden vor der Nutzung für Zwecke der externen Berichterstattung und Überwachung von den Anlage- und Vermögensverwaltern, dem ESG-Manager und dem Infrastructure Equity ESG-Ausschuss (ESG CIE) geprüft.

Es wurden keine wesentlichen methodischen Einschränkungen festgestellt. Es kann zwar aufgrund der Abhängigkeit von den Offenlegungen der Unternehmen, in die investiert wird, zu Dateneinschränkungen kommen; diese werden jedoch für die Erfüllung der ökologischen/sozialen Merkmale des Teilfonds nicht als wesentlich erachtet. Der Teilfonds begegnet solchen Einschränkungen durch aktive Zusammenarbeit und eine kontinuierliche Verbesserung der Verfahren zur Erhebung von ESG-Daten.

Im Rahmen der Sorgfaltsprüfung wendet der Teilfonds verbindliche Ausschlussregeln, eine interne ESG-Bewertung und eine Bewertung des Klimarisikos an. ESG-Ratings und PAI-Indikatoren werden als Grundlage für Anlageentscheidungen genutzt, und Investitionen, die nicht den ESG-Standards des Teilfonds entsprechen, werden ausgeschlossen. Während der Haltedauer wird die ESG-Performance jährlich überwacht. Gestützt wird dieser Prozess durch eine strukturierte Datenerfassung, bestehende Kontrollmechanismen und die Zusammenarbeit mit den Unternehmen, in die investiert wird.

Die Zusammenarbeit und der aktive Dialog mit den Unternehmen, in die investiert wird, sind Kernelemente der ESG-Strategie des Teilfonds. Die Zusammenarbeit ist auf die Governance-Rechte und die Anlagestrategie des Teilfonds abgestimmt und kann direkte Dialoge, Maßnahmen zur Einflussnahme auf Vorstandsebene oder die Zusammenarbeit mit anderen Aktionären umfassen.

Der Teilfonds hat keinen Index als Referenzwert bestimmt, um die Erfüllung der beworbenen ökologischen/sozialen Merkmale zu beurteilen.

## Divulgación de información con arreglo al artículo 10 del SFDR para productos del artículo 8

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*Swiss Life Funds (LUX) Global Infrastructure Opportunities III, un subfondo de Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF (el «Fondo»)*

*LEI: 254900WHZFCHQVAD9J56*

### Resumen

Swiss Life Funds (LUX) Global Infrastructure Opportunities III, un subfondo de Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF (el «Subfondo») promueve características medioambientales y sociales («E/S»), pero no tiene un objetivo de inversión sostenible. El Subfondo cumple los requisitos del artículo 8 del Reglamento sobre la divulgación de información relativa a la sostenibilidad en el sector de los servicios financieros («SFDR») de la UE.

El Subfondo promueve las siguientes características E/S: mitigación del cambio climático y eficiencia energética, salud y seguridad, y diversidad e igualdad de oportunidades.

El Subfondo tiene como objetivo generar rentabilidades ajustadas al riesgo atractivas por medio de la construcción de una cartera diversificada de activos y empresas de infraestructuras y relacionados con las infraestructuras no cotizadas (las «Inversiones en infraestructuras») ubicadas en los países de la OCDE. En el marco de su estrategia de inversión, el Subfondo aplica una serie de reglas de exclusión, integra una evaluación ESG interna y una evaluación del riesgo climático en sus procesos de inversión y gestión de activos, y tiene previsto implicarse con las empresas en las que invierte con el fin de mejorar las normas y la transparencia en materia ESG durante el periodo de mantenimiento.

La evaluación ESG incluye una valoración de las buenas prácticas de gobernanza, e incorpora indicadores de sostenibilidad e indicadores de las principales incidencias adversas (PIA) con que se supervisa el logro de las características E/S promovidas por el Subfondo.

Como mínimo, el 90% del patrimonio del Subfondo se destinará a inversiones que promuevan una o más características E/S del Subfondo, y el 10% restante se asignará a derivados, efectivo y equivalentes de efectivo por motivos operativos.

El logro de las características E/S promovidas se mide, supervisa y evalúa mediante los indicadores de sostenibilidad que se asocian con cada inversión individual. Estos indicadores se detallan en el apartado «Seguimiento de las características medioambientales o sociales» que figura a continuación.

El Subfondo utiliza un marco de evaluación ESG interno que combina metodologías cuantitativas y cualitativas, entre las que se incluyen indicadores de las principales incidencias adversas, parámetros de sostenibilidad personalizados, y factores cualitativos, como certificaciones y revisiones de medios. Los indicadores ESG se evalúan en la fase de diligencia debida de la inversión y se supervisan a lo largo del periodo de mantenimiento. Los procedimientos de validación de datos que se han establecido garantizan la coherencia y la fiabilidad, y cualquier limitación se aborda mediante la interacción y la triangulación de fuentes.

Los datos ESG relativos a nuevas inversiones se recogen en la fase de diligencia debida de la inversión por parte de los gestores de inversión, los cuales cuentan con el respaldo de asesores ESG externos y del marco de evaluación ESG interno del Subfondo. Durante el periodo de mantenimiento, el Subfondo recoge datos ESG directamente de las empresas en cartera. Los datos son revisados por los gestores de inversiones y de activos, junto con el gestor ESG y el Comité de Renta Variable de Infraestructuras ESG (ESG CIE), antes de que esos datos se utilicen para preparar informes externos sobre las características E/S y a efectos de supervisión.

No se han identificado limitaciones metodológicas materiales. Aunque podrían surgir limitaciones en materia de datos debido a la dependencia de la información divulgada por las empresas en las que se invierte, estas limitaciones no se consideran relevantes para el logro de las características E/S promovidas por el Subfondo. El Subfondo aborda dichas limitaciones mediante la implicación activa y la mejora continua de los procesos de recogida de datos ESG.

En el marco del proceso de diligencia debida, el Subfondo aplica reglas de exclusión vinculantes, una evaluación ESG interna y una evaluación del riesgo climático. Las calificaciones ESG y los indicadores de las principales incidencias adversas se utilizan para fundamentar las decisiones de inversión, y se excluyen las inversiones que no satisfagan las normas ESG del Subfondo. Durante el periodo de mantenimiento, el rendimiento en materia ESG se supervisa de forma anual, con apoyo de procesos estructurados de recogida de datos, controles internos e implicación con las empresas en las que se invierte.

La implicación y el diálogo activo con las empresas en las que se invierte es un componente esencial de la estrategia ESG del Subfondo. Esta implicación se adapta a los derechos de gobernanza y a la estrategia de inversión del Subfondo, y puede incluir el diálogo directo, la influencia a nivel de consejo o la colaboración con otros accionistas.

El Subfondo no ha designado ningún índice específico como indicador de referencia a los efectos de evaluar el logro de las características E/S promovidas.

## Informations publiées en vertu de l'article 10 du Règlement SFDR pour les produits relevant de l'article 8

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### Résumé

Swiss Life Funds (LUX) Global Infrastructure Opportunities III, un compartiment de Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF (le « Compartiment »), promeut des caractéristiques environnementales et sociales (« E/S »), mais n'a pas d'objectif d'investissement durable. Le Compartiment relève du champ d'application de l'Article 8 du Règlement sur la publication d'informations en matière de durabilité dans le secteur des services financiers (SFDR) de l'UE.

Le Compartiment promeut les caractéristiques E/S suivantes : atténuation du changement climatique et efficacité énergétique, santé et sécurité, diversité et égalité des chances.

Le Compartiment a pour objectif de générer des rendements ajustés du risque attrayants, en construisant un portefeuille diversifié d'actifs et d'entreprises d'infrastructure ou liés aux infrastructures non cotés (les « Investissements d'infrastructure ») et situés dans des pays de l'OCDE. Dans le cadre de sa stratégie d'investissement, le Compartiment applique un ensemble de règles d'exclusion, intègre une évaluation ESG exclusive et une évaluation du risque climatique dans ses processus d'investissement et de gestion des actifs, et vise à s'engager auprès des sociétés dans lesquelles il investit afin d'améliorer leurs normes ESG et leur transparence tout au long de la période de détention.

L'évaluation ESG comprend une analyse des pratiques de bonne gouvernance et intègre des indicateurs relatifs à la durabilité et aux principales incidences négatives (PIN) afin de contrôler la réalisation des caractéristiques E/S promues par le Compartiment.

Le Compartiment doit être composé au moins à 90% d'investissements qui promeuvent une ou plusieurs de ses caractéristiques E/S, les 10% restants pouvant être alloués à des produits dérivés, à des liquidités et à des quasi-liquidités détenues pour des raisons opérationnelles.

La réalisation des caractéristiques E/S promues est mesurée, suivie et évaluée à l'aide des indicateurs de durabilité associés à chaque investissement individuel. Ces indicateurs sont détaillés à la section « Suivi des caractéristiques environnementales ou sociales » ci-dessous.

Le Compartiment utilise un cadre d'évaluation ESG exclusif qui combine des méthodologies quantitatives et qualitatives, y compris des indicateurs relatifs aux principales incidences négatives, des indicateurs de durabilité personnalisés ainsi que des facteurs qualitatifs (certifications et vérification des médias par exemple). Les indicateurs ESG sont évalués lors du processus de diligence raisonnable des investissements et font l'objet d'un suivi tout au long de la période de détention. Les différentes étapes de validation des données mises en place sont gages de cohérence et de fiabilité, et les éventuelles limitations sont traitées par le biais de l'engagement et de la triangulation des sources.

Les données ESG relatives aux nouveaux investissements sont collectées par les gestionnaires au cours du processus de diligence raisonnable, en collaboration avec des conseillers ESG externes et à l'aide du cadre d'évaluation ESG exclusif du Compartiment. Durant la période de détention, le Compartiment collecte des données ESG directement auprès des entreprises du portefeuille. Les données sont examinées par les gestionnaires des investissements et des actifs, le gestionnaire ESG et le comité ESG Infrastructure Equity (ESG CIE), avant d'être utilisées aux fins des rapports externes et du suivi.

Aucune limite méthodologique significative n'a été identifiée. Bien que la dépendance à l'égard des informations publiées par les entreprises bénéficiaires des investissements puisse donner lieu à des limitations en matière de données, celles-ci ne sont pas considérées comme importantes aux fins de la réalisation des caractéristiques E/S du Compartiment. Face à ces limitations, le Compartiment promeut un engagement actif et une amélioration continue des processus de collecte des données ESG.

Dans le cadre du processus de diligence raisonnable, le Compartiment applique des règles d'exclusion contraignantes, une évaluation ESG exclusive et une évaluation du risque climatique. Les décisions d'investissement s'appuient sur les notations ESG et les indicateurs relatifs aux principales incidences négatives, et les placements qui ne répondent pas aux normes ESG du Compartiment sont exclus. Au cours de la période de détention, les performances ESG sont contrôlées annuellement grâce à un processus de collecte de données structuré, à divers processus de contrôle et à un engagement auprès des entreprises bénéficiaires des investissements.

L'engagement et le dialogue actif avec les entreprises bénéficiaires des investissements sont au cœur de la stratégie ESG du Compartiment. L'engagement est adapté aux droits de gouvernance et à la stratégie d'investissement du Compartiment et peut passer par un dialogue direct, une influence au niveau du conseil d'administration ou une collaboration avec d'autres actionnaires.

Le Compartiment n'a pas désigné d'indice spécifique comme référence pour mesurer la réalisation des caractéristiques E/S promues.

## Articolo 10 Informativa SFDR per prodotti articolo 8

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### Sintesi

Swiss Life Funds (LUX) Global Infrastructure Opportunities III, un comparto di Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF (il "Comparto") promuove caratteristiche ambientali e sociali ("A/S") ma non ha come obiettivo investimenti sostenibili. Il Comparto rientra nell'ambito di applicazione dell'articolo 8 del Regolamento relativo all'informativa sulla sostenibilità nel settore dei servizi finanziari (SFDR) dell'UE.

Il Comparto promuove le seguenti caratteristiche A/S: mitigazione dei cambiamenti climatici ed efficienza energetica, salute e sicurezza, diversità e pari opportunità.

Il Comparto si prefigge l'obiettivo di generare rendimenti corretti per il rischio interessanti mediante la costruzione di un portafoglio diversificato di attivi e imprese infrastrutturali e legati a infrastrutture non quotati ("Investimenti infrastrutturali") aventi sede in paesi OCSE. Nell'ambito della strategia d'investimento, il Comparto applica una serie di criteri di esclusione, integra una valutazione ESG proprietaria e una valutazione dei rischi climatici nei suoi processi di investimento e di gestione patrimoniale, e mira a impegnarsi con le imprese beneficiarie degli investimenti per migliorare la trasparenza e gli standard ESG durante l'intero periodo di detenzione.

La valutazione ESG comprende una valutazione delle prassi di buona governance e incorpora indicatori di sostenibilità e dei principali effetti negativi (PAI) per monitorare il raggiungimento delle caratteristiche A/S promosse dal Comparto.

Almeno il 90% del Comparto è costituito da investimenti che promuovono una o più caratteristiche A/S del Comparto. Il restante 10% può essere destinato a posizioni in derivati, liquidità e strumenti equivalenti detenute per motivi operativi.

Il raggiungimento delle caratteristiche A/S promosse viene misurato, monitorato e valutato utilizzando gli indicatori di sostenibilità associati a ogni singolo investimento. Questi indicatori sono illustrati nel dettaglio nella seguente sezione "Monitoraggio delle caratteristiche ambientali o sociali".

Il Comparto si avvale del sistema di valutazione ESG sviluppato internamente che abbina metodologie quantitative e qualitative, inclusi indicatori dei principali effetti negativi, parametri di sostenibilità sviluppati appositamente e fattori qualitativi quali certificazioni e controlli multimediali. Gli indicatori ESG sono valutati nel corso della procedura di dovuta diligenza e monitorati durante l'intero periodo di detenzione. Le fasi di convalida dei dati assicurano coerenza e affidabilità, e qualsiasi limitazione viene affrontata mediante l'engagement (impegno) e la triangolazione delle fonti.

Per i nuovi investimenti, i gestori degli investimenti raccolgono i dati ESG durante la procedura di dovuta diligenza, supportati da consulenti ESG esterni e dal sistema di valutazione ESG proprietario del Comparto. Durante il periodo di detenzione, il Comparto raccoglie i dati ESG direttamente dalle società in portafoglio. I dati sono esaminati dai gestori degli investimenti e dai gestori patrimoniali, dal gestore ESG e dall'ESG Committee Infrastructure Equity (ESG CIE) prima di essere utilizzati per la rendicontazione esterna e il monitoraggio.

Non sono state riscontrate limitazioni metodologiche sostanziali. Essendo basati sulle informazioni fornite dalle imprese beneficiarie degli investimenti, i dati possono presentare limitazioni, ma non si ritiene che queste pregiudichino il raggiungimento delle caratteristiche A/S del Comparto. Il Comparto affronta tali limitazioni tramite l'impegno attivo con le società e il continuo miglioramento delle procedure di raccolta dei dati ESG.

Nell'ambito della dovuta diligenza, il Comparto applica regole di esclusione vincolanti, un sistema di valutazione ESG proprietario e una valutazione dei rischi climatici. Le decisioni d'investimento tengono conto dei rating ESG e degli indicatori dei principali effetti negativi, e gli investimenti che non soddisfano gli standard ESG del Comparto sono esclusi. Durante il periodo di detenzione, la performance ESG è sottoposta con cadenza annuale a un monitoraggio che si avvale di una raccolta strutturata dei dati, dell'implementazione di procedure di controllo e dell'impegno con le imprese beneficiarie degli investimenti.

L'impegno e il dialogo attivo con le imprese beneficiarie degli investimenti sono un elemento fondamentale della strategia ESG del Comparto. L'impegno è strutturato in base ai diritti di governance e alla strategia di investimento del Comparto e può includere il dialogo diretto, l'influenza a livello di consiglio di amministrazione o la collaborazione con altri azionisti.

Il Comparto non ha designato un indice specifico come indice di riferimento allo scopo di misurare il raggiungimento delle caratteristiche A/S promosse.

## **Informatieverschaffing volgens artikel 10 van de SFDR voor artikel 8- producten**

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### **Samenvatting**

Swiss Life Funds (LUX) Global Infrastructure Opportunities III, een subfonds van Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF, (het 'Subfonds') promoot ecologische en sociale ('E/S') kenmerken, maar heeft geen duurzame beleggingsdoelstelling. Het Subfonds valt onder artikel 8 van de Verordening betreffende informatieverschaffing over duurzaamheid in de financiële dienstensector (de 'SFDR') van de EU.

Het Subfonds promoot de volgende E/S-kenmerken: klimaatmitigatie en energie-efficiëntie, gezondheid en veiligheid, en diversiteit en gelijke kansen.

De doelstelling van het Subfonds is om een aantrekkelijk risicogewogen rendement te genereren door een gediversifieerde portefeuille samen te stellen van niet-beursgenoteerde infrastructuuractiva en -ondernemingen of aan infrastructuur gerelateerde activa en ondernemingen ('Infrastructuurbeleggingen') uit OESO-landen. In het kader van zijn beleggingsstrategie past het Subfonds een reeks uitsluitingsregels toe, hanteert het een eigen ESG-beoordeling en een klimaatrisicobeoordeling in zijn beleggings- en vermogensbeheerprocessen en streeft het ernaar om met de ondernemingen waarin het belegt in gesprek te gaan om tijdens de beleggingsperiode hun ESG-normen en -transparantie te verbeteren.

Binnen de ESG-beoordeling worden goede governancepraktijken geëvalueerd en zijn duurzaamheidsindicatoren en indicatoren voor de belangrijkste ongunstige effecten (Principal Adverse Impacts, PAI's) geïntegreerd om na te gaan of de door het Subfonds gepromote E/S-kenmerken worden bereikt.

Minimaal 90% van het Subfonds bestaat uit beleggingen die een of meer E/S-kenmerken van het Subfonds promoten. De resterende 10% kan worden toegewezen aan derivaten, geldmiddelen en kasequivalenten die om operationele redenen worden aangehouden.

Het verwezenlijken van de gepromote E/S-kenmerken wordt gemeten, gemonitord en beoordeeld aan de hand van de duurzaamheidsindicatoren die aan elke individuele belegging zijn gekoppeld. Deze indicatoren worden gedetailleerd beschreven in de onderstaande rubriek 'Monitoring van ecologische of sociale kenmerken'.

Het Subfonds maakt gebruik van een eigen ESG-beoordelingskader, dat zowel kwantitatieve als kwalitatieve methoden behelst, waaronder indicatoren voor de belangrijkste ongunstige effecten, duurzaamheidscijfers op maat en kwalitatieve factoren, zoals certificeringen en controles van de media. De ESG-indicatoren worden beoordeeld tijdens het due-diligence-onderzoek van de belegging en worden gedurende de gehele beleggingsperiode gemonitord. Dankzij de verschillende stappen in de validatie van de gegevens kunnen we consistentie en betrouwbaarheid garanderen. Eventuele beperkingen worden aangepakt aan de hand van engagement en triangulatie van bronnen.

ESG-gegevens over nieuwe beleggingen worden door de beleggingsbeheerders verzameld tijdens het due-diligence-onderzoek. Daarbij worden ze ondersteund door externe ESG adviseurs en gebruiken ze een eigen ESG-beoordelingskader. Tijdens de beleggingsperiode verzamelt het Subfonds ESG-gegevens rechtstreeks bij de bedrijven uit de portefeuille. De gegevens worden beoordeeld door de beleggings- en activabeheerders, de ESG-manager en het ESG-comité Infrastructure Equity ('ESG CIE') voordat deze worden gebruikt voor externe rapportage en monitoring.

We hebben geen wezenlijke methodologische beperkingen gevonden. Aangezien we voor de informatieverschaffing afhankelijk zijn van de ondernemingen waarin wordt belegd, kunnen we beperkingen ondervinden bij het verzamelen van de gegevens, maar deze worden niet als wezenlijk beschouwd voor het bereiken van de E/S-kenmerken van het Subfonds. Het Subfonds pakt dergelijke beperkingen aan door actief engagement en voortdurende verbetering van de processen voor het verzamelen van ESG-gegevens.

Het due-diligence-onderzoek van het Subfonds omvat bindende uitsluitingsregels, een eigen ESG-beoordeling en een beoordeling van het klimaatrisico. De beleggingsbeslissingen worden onderbouwd op basis van ESG-ratings en indicatoren voor de belangrijkste ongunstige effecten. Beleggingen die niet voldoen aan de ESG-normen van het Subfonds worden uitgesloten. Zolang een belegging wordt aangehouden, worden de ESG-prestaties ervan jaarlijks gecontroleerd op basis van gegevens die op een gestructureerde manier worden verzameld, onze controleprocessen en engagement-initiatieven bij de bedrijven waarin wordt belegd.

Engagement en een actieve dialoog met de bedrijven waarin wordt belegd, vormen een centrale component van de ESG-strategie van het Subfonds. Ons engagement is afgestemd op de governance-regels en de beleggingsstrategie van het Subfonds en kan bestaan uit een directe dialoog, invloed op het bestuursniveau en samenwerking met andere aandeelhouders.

Het Subfonds heeft geen specifieke index aangewezen als referentiebenchmark om de verwezenlijking van de gepromote E/S-kenmerken te meten.

## Art. 10 SFDR rapportering for art. 8-produkter

(Gjelder fra 12.01.2026)  
Utgivelsesdato: 12.01.2026

Versjon: 4

*Swiss Life Funds (LUX) Global Infrastructure Opportunities III, et underfond i Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF ("Fondet")*

*LEI: 254900WHZFCHQVAD9J56*

### Sammendrag

Swiss Life Funds (LUX) Global Infrastructure Opportunities III, et underfond i Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF ("Underfondet") fremmer miljø- og samfunnsnyttige ("E/S") egenskaper, men har ikke et bærekraftig investeringsmål. Underfondet er innenfor rammen av paragraf 8 i EU-forordningen om rapportering om bærekraftig finans (SFDR).

Underfondet fremmer følgende E/S-egenskaper: demping av klimaendringer, energieffektivitet, helse og sikkerhet samt mangfold og likestilling.

Underfondets mål er å generere attraktivt risikostjert avkastning ved å sette sammen en diversifisert portefølje med unoterte infrastruktur- og infrastrukturrelaterte aktiva og virksomheter ("Infrastrukturinvesteringer") i OECD-land. Som en del av dets investeringsstrategi, anvender underfondet et sett med eksklusjonsregler, integrerer en egenutviklet ESG-vurdering og klimarisikovurdering i dets investerings- og kapitalforvaltningsprosesser, og tar sikte på å engasjere seg med selskapene det investeres i for å bedre ESG-standarder og transparens gjennom hele investeringsperioden.

ESG-vurderingen omfatter en evaluering av gode eierstyringspraksiser og inneholder bærekraftsindikatorer og indikatorer for de viktigste negative effektene (PAI) for å overvåke oppnåelsen av E/S-egenskapene som underfondet fremmer.

Minst 90 % av underfondet skal bestå av investeringer som fremmer én eller flere av underfondets E/S-egenskaper. De gjenværende 10 % kan bli allokert på derivater, kontanter og kontantekvivalenter av driftsmessige årsaker.

Oppnåelsen av E/S-egenskapene som fremmes, måles, overvåkes og evalueres ved bruk av bærekraftsindikatorer forbundet med hver enkelt investering. Disse indikatorene er forklart i delen "Overvåking av miljømessige eller sosiale egenskaper" nedenfor.

Underfondet bruker et egenutviklet ESG-rammeverk som kombinerer kvantitative og kvalitative metodologier, blant annet indikatorer for de viktigste negative effektene, egendefinerte bærekraftsstatistikk og kvantitative faktorer som sertifiseringer og mediekontroller. ESG-indikatorerne vurderes under due diligence av investeringene og overvåkes gjennom hele investeringsperioden. Tiltak for datavalidering er på plass for å sikre samsvar og pålitelighet, og eventuelle begrensninger behandles gjennom engasjement og triangulering av kilder.

ESG-data for nye investeringer samles inn under due diligence-prosessen av forvalterne, støttet av eksterne ESG-rådgivere og underfondets egenutviklede ESG-vurderingsrammeverk. Under investeringsperioden samler underfondet inn ESG-data direkte fra porteføljeselskapene. Dataene gjennomgås av investerings- og kapitalforvalterne, ESG-forvalteren og komiteen ESG Committee Infrastructure Equity (ESG CIE) før de brukes for ekstern rapportering og overvåking.

Ingen vesentlige metodologiske begrensninger er blitt identifisert. Selv om det kan oppstå begrensninger på grunn av avhengighet av rapportering fra selskapene det investeres i, anses disse ikke som vesentlige med hensyn til å oppnå underfondets E/S-egenskaper. Underfondet behandler slike begrensninger gjennom aktivt engasjement og kontinuerlig forbedring av innsamlingsprosessene for ESG-data.

Som en del av due diligence-prosessen, anvender underfondet bindende ESG-regler, en egenutviklede ESG-vurdering og en klimarisikovurdering. ESG-rater og indikatorer for de viktigste negative effektene brukes som informasjonsgrunnlag for investeringsbeslutninger, og investeringer som ikke innfrir underfondets ESG-standarder ekskluderes. I løpet av investeringsperioden overvåkes ESG-resultatene årlig, støttet av strukturert datainnsamling, kontrollprosessene som er på plass og engasjement med selskapene det er investert i.

Engasjement og aktiv dialog med investeringsobjektene er en kjernekomponent i underfondets ESG-strategi. Engasjementet tilpasses underfondets styringsrettigheter og investeringsstrategi, og kan omfatte direkte dialog, innflytelse på styrenivå og samarbeid med andre aksjonærer.

Underfondet har ikke benevnt en spesifikk indeks som referanseindeks for det formål å måle oppnåelsen av E/S-egenskapene som fremmes.

## Art. 10.º SFDR Divulgação para os produtos do Art. 8.º

(Data de entrada em vigor 12.01.2026)

Data de publicação: 12.01.2026

Versão: 4

*Swiss Life Funds (LUX) Global Infrastructure Opportunities III, um subfundo do Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF (o "Subfundo")*

*LEI: 254900WHZFCHQVAD9J56*

### Resumo

Swiss Life Funds (LUX) Global Infrastructure Opportunities III, um subfundo do Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF (o "Subfundo"), promove características ambientais ou sociais ("E/S"), mas não tem um objetivo de investimento sustentável. O Subfundo está abrangido pelo âmbito de aplicação do Artigo 8.º do Regulamento da União Europeia relativo à divulgação de informações sobre sustentabilidade dos serviços financeiros (SFDR).

O Subfundo promove as seguintes características E/S: mitigação das alterações climáticas e eficiência energética, saúde e segurança, e diversidade e igualdade de oportunidades.

O objetivo do Subfundo é o de gerar retornos ajustados ao risco atrativos através da construção de uma carteira diversificada de ativos e de empresas de infraestruturas ou relacionados com infraestruturas não cotados ("Investimentos em Infraestruturas") que estejam localizados em países da OCDE. Como parte da sua estratégia de investimento, o Subfundo aplica um conjunto de regras de exclusão, integra uma avaliação ESG proprietária e uma avaliação de risco climático nos seus processos de gestão de investimento e de ativos e procura, durante o período de detenção, um envolvimento com as empresas beneficiárias do investimento centrado na melhoria dos padrões e a transparência das mesmas em matéria de ESG.

A avaliação ESG inclui uma avaliação de práticas de boa governação e integra indicadores de sustentabilidade e dos principais impactos negativos (PIN) para monitorizar o cumprimento das características E/S promovidas pelo Subfundo.

Pelo menos 90% do Subfundo é constituído por investimentos que promovem uma ou mais características E/S do Subfundo. Os restantes 10% devem ser alocados a derivados, a caixa e equivalentes de caixa detidos por razões operacionais.

A concretização das características E/S promovidas é medida, monitorizada e avaliada utilizando indicadores de sustentabilidade associados a cada investimento individual. Estes indicadores são descritos mais pormenorizadamente na secção "Monitorização das características ambientais ou sociais" abaixo.

O Subfundo utiliza um quadro de avaliação ESG proprietário que combina metodologias quantitativas e qualitativas, incluindo indicadores dos principais impactos negativos, parâmetros de sustentabilidade personalizados e fatores qualitativos (por exemplo, certificações e verificações de reputação nos meios de comunicação). Os indicadores ESG são avaliados durante a fase de diligência devida do investimento e monitorizados ao longo do período de detenção. As etapas de validação de dados implementadas garantem a consistência e a fiabilidade, sendo quaisquer limitações abordadas através do envolvimento e da triangulação de fontes.

Quando se trata de novos investimentos, os gestores de investimento recolhem dados ESG durante a diligência devida, com o apoio dos consultores ESG externos e do quadro de avaliação ESG proprietário do Subfundo. Durante o período de detenção, o Subfundo recolhe dados ESG diretamente das empresas da carteira. Os dados são revistos pelos gestores de investimento e de ativos, pelo gestor ESG e pelo Comité ESG de Ações de Infraestruturas (Comité ESG) antes de serem usados para a comunicação de informações externa e para monitorização.

Não foram identificadas limitações metodológicas significativas. Embora possam surgir limitações de dados devido à dependência das divulgações das empresas beneficiárias do investimento, estas não são consideradas pertinentes para a concretização das características E/S do Subfundo. O Subfundo aborda tais limitações através do envolvimento ativo e da melhoria contínua dos processos de recolha de dados ESG.

Como parte da diligência devida, o Subfundo aplica regras de exclusão vinculativas, uma avaliação ESG proprietária e uma avaliação de risco climático. As notações ESG e os indicadores dos principais impactos negativos são utilizados para informar as decisões de investimento, sendo excluídos os investimentos que não cumprem os padrões em matéria de ESG do Subfundo. Durante o período de detenção, o desempenho ESG está sujeito a uma avaliação anual, apoiada pela recolha estruturada de dados, pela implementação de processos de controlo e pelo envolvimento com as empresas beneficiárias do investimento.

O envolvimento e o diálogo ativo com as empresas beneficiárias do investimento são componentes centrais da estratégia ESG do Subfundo. O envolvimento é adaptado aos direitos de governação e à estratégia de investimento do Subfundo, podendo incluir diálogo direto, influência a nível do conselho de administração ou colaboração com outros acionistas.

O Subfundo não designou um índice específico como índice de referência para o efeito de medir a concretização das características E/S.

## Art. 10 SFDR Upplysningar om artikel 8-produkter

(Ikraftträdandedatum 12.01.2026)

Publiceringsdatum: 12.01.2026

Version: 4

*Swiss Life Funds (LUX) Global Infrastructure Opportunities III, en delfond i Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF ("delfonden")*

*LEI: 254900WHZFCHQVAD9J56*

### Sammanfattning

Swiss Life Funds (LUX) Global Infrastructure Opportunities III, en delfond i Swiss Life Funds (LUX) Global Infrastructure Opportunities Umbrella, SCS, SIF ("**delfonden**") främjar miljörelaterade och sociala ("**E/S**") egenskaper men har inget mål för hållbar investering. Delfonden omfattas av artikel 8 i EU:s förordning om hållbarhetsrelaterade upplysningar (SFDR).

Fonden främjar följande E/S egenskaper: begränsning av klimatförändringar och energieffektivitet, hälsa och säkerhet samt mångfald och lika möjligheter.

Delfondens mål är att generera attraktiv riskjusterad avkastning genom att sammansätta en diversifierad portfölj med onoterade infrastruktur- och infrastrukturellrelaterade tillgångar och företag ("**infrastrukturinvesteringar**") belägna i OECD-länder. Som en del av sin investeringsstrategi tillämpar delfonden en uppsättning uteslutningsregler, integrerar en egenutvecklad ESG-bedömning och klimatriskbedömning i sina processer för investeringar och kapitalförvaltning, och strävar efter att ha löpande kontakter med investeringsobjekten för att förbättra ESG-standarder och insyn under hela innehavstiden.

ESG-bedömningen omfattar en utvärdering av praxis för god styrning som inbegriper hållbarhetsindikatorer och indikatorer för huvudsakliga negativa konsekvenser (PAI-indikatorer) för att övervaka uppnåendet av de E/S-egenskaper som fonden främjar.

Minst 90 procent av delfonden ska bestå av investeringar som främjar en eller flera av delfondens E/S-egenskaper. De återstående 10 procenten får allokeras till derivat, kontanter och likvida medel som innehas för driftsändamål.

Uppnåendet av de E/S-egenskaper som främjas mäts, övervakas och utvärderas med hjälp av hållbarhetsindikatorer som är kopplade till varje enskild investering. Dessa indikatorer beskrivs i detalj i avsnittet "Övervakning av miljörelaterade eller sociala egenskaper" nedan.

Delfonden använder ett egenutvecklat ramverk för ESG-bedömning som kombinerar kvantitativa och kvalitativa metoder, däribland indikatorer för huvudsakliga negativa konsekvenser, anpassade hållbarhetsmått och kvalitativa faktorer såsom certifieringar och mediegranskningar. ESG-indikatorer bedöms under investeringens due diligence-process och övervakas under hela innehavstiden. Stegen för datavalidering säkerställer konsekvens och tillförlitlighet, och eventuella begränsningar hanteras genom engagemang och triangulering av källor.

Investeringsförvaltaren samlar in ESG-data för nya investeringar under due diligence-processen med stöd av externa ESG-rådgivare och delfondens egenutvecklade ramverk för ESG-bedömning. Under innehavstiden samlar delfonden in ESG-data direkt från portföljbolagen. Dessa data granskas av investerings- och kapitalförvaltaren, ESG-förvaltaren och ESG Committee Infrastructure Equity (ESG CIE) innan de används för extern rapportering och övervakning.

Inga väsentliga metodbegränsningar har identifierats. Även om det kan uppstå begränsningar i datatillgången på grund av beroendet av information från investeringsobjekten, anses dessa inte vara väsentliga för delfondens förmåga att uppnå sina E/S-egenskaper. Delfonden hanterar sådana begränsningar genom aktivt engagemang och kontinuerliga förbättringar av processerna för insamling av ESG-data.

Som en del av sin due diligence-process tillämpar delfonden bindande uteslutningsregler, en egen ESG-bedömning samt klimatriskbedömning. ESG-betyg och indikatorer för huvudsakliga negativa konsekvenser används som underlag för investeringsbeslut, och investeringar som inte uppfyller delfondens ESG-standarder utesluts. Under innehavstiden övervakas ESG-resultaten årligen med hjälp av strukturerad datainsamling, kontrollprocesser och engagemang med investeringsobjekten.

Engagemang och aktiv dialog med investeringsobjekten är en central del av delfondens ESG-strategi. Engagemanget anpassas utifrån delfondens styrningsrättigheter och investeringsstrategi, och kan omfatta direkt dialog, inflytande på styrelsenivå eller samarbete med andra aktieägare.

Delfonden har inte valt ett specifikt index som referensvärde för att mäta uppnåendet av de E/S-egenskaper som den främjar.

**Review of disclosures**

As required by Article 12 of the SFDR, please find below the explanation of the amendments brought to the website disclosures, published in accordance with Article 10 of the SFDR:

Date	Explanations of Amendments
01.01.2023	Version 1 - Initial document created.
15.01.2023	Version 2 - Inclusion of additional summary translations.
01.06.2024	Version 3 - Inclusion of this table (the "Explanation of Amendments")
12.01.2026	Version 4 - Revision of the target levels of the sustainability indicators Update and revision of the entire document Update and increase of level of detail in information on methodologies Editorial adjustments Adjustment as part of the introduction of ESMA guidelines on fund names that use ESG or sustainability related terms