

Swiss Life Index Funds (LUX) - Equity ESG EMU

Equity ESG EMU

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Summary

This sub-fund falls within the scope of Article 8 under the Sustainable Finance Disclosure Regulation (SFDR) of the EU. The sub-fund promotes environmental and social characteristics but does not have a sustainable investment as its objective.

The sub-fund aims to replicate the MSCI ESG EMU Leader Index designed to represent the performance of companies that are selected from an underlying index based on environmental, social and governance (ESG) criteria.

The sub-fund promotes the following environmental and social characteristics:

- invests according to the ESG methodology of the index provider (best-in-class)
- does not invest in certain issuers based on ESG exclusions applied by the index provider when constructing the index
- adheres to and conducts business activities in accordance with conduct-based exclusions of SVVK-ASIR (business-conduct exclusions on direct investments) provided the sub-fund stays within the anticipated tracking error as determined in the prospectus of Swiss Life Index Funds (LUX)

The sub-fund's strategy is to track its reference benchmark, while applying some regulatory, normative and sectorial exclusions. The sub-fund's binding elements is to adhere to the index methodology of the index provider and apply conduct-based exclusions of SVVK. The management company of Swiss Life Funds (LUX) (the "**Management Company**") also applies a policy assessing the good governance practices of the investee companies.

70% of the NAV of the sub-fund is expected to be directly invested in issuers that promote environmental and social characteristics.

To monitor environmental and social characteristics, three internal control procedures are conducted by three different departments during (i) the ESG selection process, (ii) on a daily basis post-trade and (iii) a department ensures that the controls are done properly.

The Management Company applies the MSCI methodology to measure how the social or environmental characteristics promoted by the financial product are met. The Management Company also considers some principal adverse impacts on sustainability factors.

As part of its ESG analysis of issuers, the portfolio manager of the sub-fund relies on internal and external data sources to attain each of the environmental and social characteristics promoted.

The limitations to methodologies and data are related to (i) the missing or deficient disclosure by some issuers of information that is used as an input into the MSCI ESG rating model, (ii) to the quantity and quality of ESG data to be processed by MSCI ESG and (iii) the identification of information and factors relevant to ESG analysis. With the mitigation measures implemented by MSCI, none of the limitations identified above are considered to affect the attainment of the environmental and social characteristics of the sub-fund in a material manner.

Due diligence is performed by the index provider during the index construction process.

The MSCI ESG EMU Leader Index has been designated as a reference benchmark to meet the environmental or social characteristics promoted by the sub-fund.

Engagement may occur at the level of the sub-fund through overarching engagement and voting activities of the Management Company.

Please refer to the bottom of the document for a French and German translations of this summary.¹⁾

1) The English version of this summary is the legally binding version whereas the French and German summaries are translations only.

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 environmental and social characteristics:

- promotes to invest according to the ESG methodology of the index provider (best-in-class)
- promotes to not invest in certain issuers based on ESG Exclusions applied by the index provider when constructing the index
- promotes adherence to, and conducting business activities in accordance with conduct-based exclusions of SVVK-ASIR (Business-conduct Exclusions on direct investments) provided the sub-fund stays within the anticipated tracking error as determined in the Prospectus

Investment strategy

The investment strategy of the sub-fund is to track its reference benchmark. The sub-fund may invest in a representative selection of securities from the benchmark index (optimized sampling) rather than in all the securities in the index. Selection is facilitated by a system that takes account of both quantitative factors as well as factors that determine returns. To attain the environmental or social characteristics promoted by this sub-fund, this sub-fund applies an ESG best-in-class approach and ESG Exclusions.

Regulatory exclusions: The sub-fund excludes investments involved in controversial weapons (such as antipersonnel landmines, cluster munitions, biological, chemical or nuclear weapons) and issuers that fall under the Financial Action Task Force (FATF) blacklist.

In addition, provided the sub-fund stays within the anticipated tracking error as determined in the prospectus, the portfolio management team may integrate additional ESG considerations for the selection of securities, like the following:

Normative and sectorial exclusions: The sub-fund is not allowed to invest in issuers: that are involved in very severe ESG controversies, including breaches of the UN Global Compact principles, or that derive more than 10% of their revenues from thermal coal mining or trading.

The sub-fund's binding elements are:

- Adhere to the index methodology of the index provider:
 - Companies are required to have a MSCI Rating of BB or above
 - Companies are required to have a MSCI ESG controversies score of 3 or above

- Application of conduct-based exclusions of SVVK: ASIR, provided the sub-fund stays within the anticipated tracking error as determined in the Prospectus. Please note, the investment managers may discontinue to apply the conduct-based exclusions at any time if those would lead to exceed the anticipated tracking error as described for the Prospectus.

Policy to assess good governance practices of the investee companies:

The Management Company assesses company decision-making processes and controls, as well as how management balances the interests of shareholders, employees, suppliers, customers, the community and other stakeholders. Based on ESG ratings and controversies assessments, the analysis of company governance includes:

- audit and financial reporting practices
- alignment between remuneration schemes and corporate strategy
- composition, effectiveness and oversight of the board
- company's ownership and control
- tax transparency
- business ethics issues such as fraud, executive misconduct, corrupt practices, money laundering, or anti-trust violations.

In addition, the Management Company applies Swiss Life Asset Managers' normative exclusions to avoid issuers with poor governance practices.

Proportion of investments

The sub-fund is expected to invest through direct investments at least 70% of its NAV in issuers that integrate environmental and social characteristics. The sub-fund is allowed to invest the remainder of its NAV in remaining investments such as cash, cash equivalents, issuers that do not systematically integrate environmental and social characteristics, investments in other UCITS/UCIs and/or derivative instruments.

Monitoring of environmental or social characteristics

The internal control procedures which aim to ensure compliance by the portfolio with the ESG requirements are implemented by several departments: portfolio management, risk department, internal control. The latter two departments are independent – they report hierarchically to a member of the board of directors of Swiss Life Index Funds (LUX) which does not have an operational management function. The independent nature of these departments ensures the impartiality of the controls that are carried out. There are three levels of internal controls:

Level 1 controls: While the ESG selection process is performed by the index provider during the index construction process, the portfolio manager assures adherence to the benchmark and restrictions defined in the fund prospectus.

Level 2 controls: The risk department in charge of monitoring ESG investment constraints carries out daily post-trade controls to ensure that the sub-fund is compliant with all restrictions.

Level 3 controls: The internal control department ensures that the above-mentioned tasks are carried out properly. To do so, internal control conducts random checks to ensure that:

- The ESG investment constraints have been configured correctly in the compliance manager

tool,

- The ESG investment constraints have been monitored correctly by the local risk management teams,
- The departments involved in carrying out the level 1 controls have developed and complied with the procedure for carrying out these controls.

If internal control identifies anomalies, it issues recommendations with the aim of correcting them and then ensures these recommendations are implemented.

Methodologies

MSCI:

The portfolio manager replicates the MSCI ESG EMU Leader Index methodology which bases its ESG selection on the expertise of a recognized rating agency, MSCI ESG Research, and its ESG rating methodology. The analysis is based on a set of criteria that are generic to all issuers and then sector-specific criteria. Depending on the sector, additional assessments can be carried out by MSCI ESG on specific criteria (e.g., renewable energy production for utilities, development of clean vehicles and passenger safety for the automotive industry, or green finance and efforts to promote access to financial services in the banking industry). Among the criteria assessed on each of the 3 pillars, are:

- Environment: the level of greenhouse gas emissions, water consumption, waste recycling rate, etc.
- Social: health and well-being of employees, safety and quality of products, supplier selection process, etc.
- Governance: quality of the board of directors, executive compensation criteria, business ethics, etc.

For each of the criteria that apply, MSCI ESG evaluates two complementary elements:

- Risk exposure: MSCI ESG measures an issuer's exposure to risks which are related to a key criterion, considering its specificities (for example, the nature of its activities and the distribution of its geographical locations).
- Risk management: MSCI ESG evaluates the policies and processes implemented by an issuer, as well as the trend on relevant indicators to assess its performance (for example, obtention of environmental certifications or evolution of the accident rate, etc.).

In addition, companies that are recommended for exclusions by the Swiss Association for Responsible Investments (SVVK-ASIR) with respect to anti-personnel mines, cluster munitions, nuclear weapons (outside of NPT) and conduct-based exclusions are excluded.

Further information can be found online at: <https://svvk-asir.ch/PAI>

The Management Company takes into account some principal adverse impacts on sustainability factors and intends to mitigate its negative impact by excluding some controversial sectors (implied by the index methodology):

- PAI 1 (GHG emissions),
- PAI 2 (carbon footprint),
- PAI 3 (GHG intensity of investee companies),
- PAI 4 (Share of investment in companies active in the fossil fuel sector),
- PAI 5 (Share on non-renewable energy consumption and production).
- PAI 10 (Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises)

- PAI 14 (Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, and biological weapons)).

Information on the principal adverse impacts on sustainability factors at the product level is available in the sub-fund's annual report.

Data sources and processing

As part of its ESG analysis of issuers, the portfolio manager of the sub-fund relies on internal and external data sources to attain each of the environmental and social characteristics promoted.

KPI	Data sources used to attain each of the environmental or social characteristics promoted	Measures taken to ensure data quality	Data processing	Proportion of data that are estimated
MSCI ESG EMU Leader Index	MSCI ESG Index	The data from MSCI is fed via file transfer protocol (ftp) transfer. Before the data is stored in our portfolio and risk management systems, broad data quality checks are conducted. Several automated checks ensure good data quality in terms of format, mapping and consistency on a daily basis.	Data is taken as it is from the data provider and fed into our portfolio management and risk system.	None
Exclusions	• MSCI ESG • Financial Action Task Force (FATF) • Schweizer Verein für verantwortungsbewusste Kapitalanlagen (SVVK-ASIR)		Data is taken as it is from the data provider and fed into our portfolio management and risk system.	none

Limitations to methodologies and data

To determine the extra-financial quality of the securities in the portfolio, the sub-fund replicates the MSCI ESG EMU Leader Index which relies on various ESG data and methodologies developed by MSCI and in particular on the ESG rating resulting from this model and data and scores from its proprietary PAI scoring model. The main limitations to data and methodologies can be summarized as follows:

MSCI ESG

- Missing or deficient disclosure by some issuers of information that is used as an input into the MSCI ESG rating model. This limitation is mitigated by MSCI ESG through alternative data sources external to the issuer to feed its model;
- Problem related to the quantity and quality of ESG data to be processed by MSCI ESG (large flow of information received on a continuous basis to be integrated into the ESG rating model): this limitation is mitigated by MSCI ESG by the use of artificial intelligence technologies and many analysts who work to transform raw data into relevant information;
- Problem related to the identification of information and factors relevant to ESG analysis, but

which is addressed upstream of the MSCI ESG model for each category of issuers, according to their specificities: MSCI ESG uses a quantitative approach validated by the expertise of each sector specialist and the opinion.

Overall, with the mitigation measures implemented by MSCI, none of the limitations identified above are considered to affect the attainment of the environmental and social characteristics of the sub-fund in a material manner.

Due diligence

Due diligence is performed by the index provider during the index construction process. Further details regarding the index methodology is available at www.msci.com/indexes.

As the sub-fund's objective is to track the index, internal controls inter alia include checks on the eligible assets universe, which are defined by the sub-funds index, as well as internal controls to measure and limit the deviation of the investment objective.

Engagement policies

Swiss Life Asset Managers has an overarching engagement and voting activities approach which does not target any fund or product specifically, but rather investee companies.

Therefore, engagement may occur at the level of the sub-fund.

Designated reference benchmark

MSCI ESG EMU Leader Index has been designated as a reference benchmark to meet the environmental or social characteristics promoted by the sub-fund.

MSCI ESG EMU Leader Index is aligned with each of the environmental or social characteristics by investing in companies that are required to have a MSCI Rating of BB or above, by investing in companies that are required to have a MSCI ESG controversies score of 3 or above, and by excluding companies that are involved in the controversial sectors defined in the Appendix 2 of the MSCI ESG Leaders Indexes Methodology. The reference benchmark is periodically rebalanced as described in the index methodology.

More information on the MSCI ESG EMU Leader Index, including the input data, the methodologies used to select those data, the rebalancing methodologies and how the index is calculated can be found online at: www.msci.com/indexes.

Additional documentation and information: The periodic reporting of Swiss Life Index Funds (LUX) as well as its prospectus (including the SFDR precontractual appendices) are available from Swiss Life Asset Managers Luxembourg as well as on the website <https://invest.swisslifeam.com/>. The periodic disclosure of the sub-fund in the annual report can be found at the end of the document. This information is sent within one week on the shareholder's written request to Swiss Life Investor Service, Swiss Life Asset Managers Luxembourg, 4a rue Albert Borschette L-1246 Luxembourg, Grand Duchy of Luxembourg; by email to info@swisslife-am.com, or by telephone on +352 267 585 0. These contact details can also be used to request further information if necessary.

Résumé

Le présent compartiment relève du champ d'application de l'article 8 du règlement de l'UE sur la publication d'informations en matière de durabilité dans le secteur des services financiers (SFDR). Il promeut des caractéristiques environnementales et sociales, mais n'a pas pour objectif un investissement durable.

Le compartiment vise à reproduire l'indice MSCI ESG EMU Leaders conçu pour représenter la performance d'entreprises sélectionnées à partir d'un indice sous-jacent basé sur des critères environnementaux, sociaux et de gouvernance (ESG).

Le compartiment promeut les caractéristiques environnementales et sociales suivantes :

- favoriser l'investissement selon la méthodologie ESG du fournisseur de l'indice (« best in class ») ;
- encourager à ne pas investir dans certains émetteurs sur la base des exclusions ESG appliquées par le fournisseur de l'indice lors de la construction de l'indice ;
- encourager le respect des dispositions de SVVK-ASIR et la conduite d'activités commerciales conformément à ces dispositions (exclusions des investissements directs sur la base de la conduite des activités commerciales), à condition que le compartiment reste en deçà de l'erreur de suivi prévue telle que définie dans le prospectus de Swiss Life Index Funds (LUX).

La stratégie du compartiment consiste à suivre son indice de référence tout en appliquant certaines exclusions réglementaires, normatives et sectorielles. Les éléments contraignants du compartiment consistent à respecter la méthodologie du fournisseur de l'indice et à appliquer les exclusions de SVVK basées sur la conduite des activités. La société de gestion de Swiss Life Funds (LUX) (la « Société de gestion ») applique également une politique d'évaluation des pratiques de bonne gouvernance des sociétés en portefeuille.

70% de la VNI du compartiment sont censés être directement investis dans des émetteurs promouvant des caractéristiques environnementales et sociales.

Pour le suivi des caractéristiques environnementales et sociales, trois procédures de contrôle interne sont menées par trois secteurs différents (i) durant le processus de sélection ESG, (ii) quotidiennement de façon post-négoce et (iii) par la suite en vue de s'assurer de la bonne réalisation des contrôles.

La Société de gestion applique la méthodologie MSCI pour mesurer le respect des caractéristiques sociales ou environnementales promues par le produit financier. La Société de gestion tient également compte de certaines principales incidences négatives sur les facteurs de durabilité.

Dans le cadre de son analyse ESG des émetteurs, le gestionnaire de portefeuille du compartiment s'appuie sur des sources de données internes et externes pour obtenir chacune des caractéristiques environnementales et sociales promues.

Les limites des méthodologies et des données sont liées (i) à l'absence ou à l'insuffisance de publications par certains fournisseurs d'informations utilisées comme sources dans le modèle de notation ESG de MSCI, (ii) à la quantité et à la qualité des données ESG devant être traitées par MSCI ESG et (iii) à l'identification des informations et des facteurs pertinents pour l'analyse ESG. Avec les mesures d'atténuation mises en œuvre par MSCI, aucune des limites susmentionnées n'est considérée comme susceptible d'affecter de manière significative l'obtention des

caractéristiques environnementales et sociales du compartiment.

Le fournisseur de l'indice effectue un contrôle préalable durant le processus de construction de l'indice.

L'indice MSCI ESG EMU Leaders a été conçu comme indice de référence pour répondre aux caractéristiques environnementales ou sociales promues par le compartiment.

L'engagement au niveau du compartiment peut intervenir par le biais d'activités d'engagement et de vote menées à un niveau supérieur par la Société de gestion.

Veuillez vous reporter à la fin du document pour une version anglaise et allemande du présent résumé.¹⁾

1) La version anglaise du présent résumé est la version juridiquement contraignante, alors que les résumés français et allemand ne sont que des traductions.

Zusammenfassung

Dieser Teilfonds fällt in den Anwendungsbereich von Artikel 8 der Sustainable Finance Disclosure Regulation (SFDR) der EU. Der Teilfonds fördert ökologische und soziale Eigenschaften, verfolgt jedoch nicht das Ziel einer nachhaltigen Anlage.

Dieser Teilfonds strebt die Nachbildung des MSCI ESG EMU Leader Index an, der die Performance von Unternehmen abbildet, die aus einem zugrunde liegenden Index basierend auf Umwelt-, Sozial- und Unternehmensführungskriterien (ESG) ausgewählt werden.

Der Teilfonds bewirbt folgende ökologische und soziale Merkmale:

- Anlagen gemäss der ESG-Methodik des Indexanbieters (Best-in-Class)
- Keine Investitionen in bestimmte Emittenten basierend auf ESG-Ausschlüssen, die der Indexanbieter bei der Indexerstellung angewendet hat
- Die Einhaltung und die Ausübung von Geschäftstätigkeiten gemäss verhaltensbezogenen Ausschlüssen des SVVK-ASIR (Ausschlüsse aufgrund des Geschäftsverhaltens auf Direktanlagen), vorausgesetzt, der Teilfonds bewegt sich im Rahmen des erwarteten Tracking Error gemäss Prospekt des Swiss Life Index Funds (LUX)

Die Strategie des Teilfonds besteht in der Abbildung seines Referenzindex unter Anwendung einiger regulatorischer, normativer und sektorieller Ausschlüsse. Die verbindlichen Elemente des Teilfonds sehen die Einhaltung der Indexmethodik des Indexanbieters und die Anwendung der verhaltensbasierten Ausschlüsse des SVVK vor. Die Verwaltungsgesellschaft von Swiss Life Funds (LUX) (die **«Verwaltungsgesellschaft»**) wendet ausserdem eine Politik zur Bewertung der Verfahrensweisen einer guten Unternehmensführung der Unternehmen, in die investiert wird, an.

70% des NAV des Teilfonds werden voraussichtlich direkt in Emittenten investiert, die ökologische und soziale Eigenschaften fördern.

Zur Überwachung der ökologischen und sozialen Eigenschaften werden von drei verschiedenen Abteilungen (i) während des ESG-Auswahlprozesses, (ii) täglich nach dem Handel drei interne Kontrollverfahren durchgeführt, wobei (iii) eine Abteilung sicherstellt, dass diese Kontrollen ordnungsgemäss ausgeführt werden.

Die Verwaltungsgesellschaft wendet die MSCI-Methodik an, um festzustellen, wie die mit dem Finanzprodukt beworbenen sozialen oder ökologischen Eigenschaften erfüllt werden. Die Managementgesellschaft berücksichtigt auch bestimmte Principal Adverse Impacts auf Nachhaltigkeitsfaktoren.

Bei der ESG-Analyse von Emittenten stützt sich der Portfoliomanager des Teilfonds auf interne und

externe Datenquellen, um die beworbenen ökologischen und sozialen Merkmale zu erreichen.

Die Einschränkungen bei Methoden und Daten beziehen sich auf (i) die fehlende oder unvollständige Offenlegung von Informationen durch einige Emittenten, die als Input für das MSCI-ESG-Ratingmodell dienen, (ii) die Menge und die Qualität der von MSCI ESG zu verarbeitenden ESG-Daten und (iii) die Identifikation von Informationen und Faktoren, die für die ESG-Analyse relevant sind. Mit den von MSCI implementierten Minderungsmaßnahmen wird davon ausgegangen, dass keine der oben genannten Einschränkungen die Erreichung der ökologischen und sozialen Merkmale des Teilfonds wesentlich beeinträchtigt.

Während des Indexerstellungsprozesses führt der Indexanbieter eine Due-Diligence-Prüfung durch.

Der MSCI ESG EMU Leader Index wurde als Referenzindex für die Erfüllung der vom Teilfonds beworbenen ökologischen oder sozialen Merkmale bestimmt.

Ein Engagement kann auf Ebene des Teilfonds durch übergeordnete Engagement- und Abstimmungsaktivitäten der Verwaltungsgesellschaft entstehen.

Eine französische und eine deutsche Übersetzung dieser Zusammenfassung finden Sie am Ende des Dokuments.¹⁾

1) Die englische Version dieser Zusammenfassung ist rechtlich verbindlich, bei der französischen und der deutschen Version handelt es sich lediglich um Übersetzungen.

Art. 10 SFDR Disclosure, Published on 15 July 2024

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
15.07.2024	Initial document created.

This is a regulatory document to meet the requirements of the Article 10 of the Sustainable Finance Disclosure Regulation (REGULATION (EU) 2019/2088 - SFDR) of the EU and not a marketing document. This document was produced with the greatest of care and to the best knowledge and belief. The information provided in this document reflects the actual information on the sub-fund of Swiss Life Index Funds (LUX). The information contained herein is exclusively intended for SFDR disclosure purposes, and should not be considered as an investment advice, investment recommendation, or a solicitation to buy or sell shares of Swiss Life Index Funds (LUX). Prior to any subscription, investors should obtain and carefully read the detailed information on the investment fund contained in all the regulatory documentation for each fund (in particular prospectus, articles of association, periodic reports, PRIIPS KIDs), which serve as the sole applicable legal basis for the purchase of fund shares. More information is available at www.swisslife-am.com. Source: Swiss Life Asset Managers / ©2022. All rights reserved. Customer Service: info@swisslife-am.com.