

## STATEMENT ON PRINCIPAL ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS

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*The following PAI Statement is provided in accordance with Article 4 Regulation (EU) 2019/2088 (“SFDR”) of 27 November 2019 of the European Parliament and of the Council supplemented by Regulation (EU) 2022/1288 of 6 April 2022.*

**Financial market participant** Swiss Life Asset Managers Luxembourg (LEI: 549300Q140HRUQWQHE05)

### **Summary**

Swiss Life Asset Managers Luxembourg considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of Swiss Life Asset Managers Luxembourg.

This statement on the principal adverse impacts on sustainability factors (the ‘PAI’) covers the reference period from 1 January to 31 December 2023 and will be reviewed on an annual basis. It covers all assets held by the funds of Swiss Life Asset Managers Luxembourg. The PAIs are measured on all assets, where possible and where data is available. Swiss Life Asset Managers Luxembourg implements mitigation actions and controls only on assets held directly by the funds they manage.

Swiss Life Asset Managers Luxembourg recognizes that its investment management activities may generate negative impacts on sustainability factors and has defined procedures to identify how its activities are linked to these adverse impacts and how to measure and mitigate them.

Swiss Life Asset Managers Luxembourg considers the PAIs identified as mandatory by SFDR. Apart from the PAI indicators identified as mandatory by SFDR, Swiss Life Asset Managers Luxembourg selected the following additional PAIs:

- Table 2, PAI 18. GHG emissions; and
- Table 3, PAI 21 Average corruption score.

Due to its' adherences to various international initiatives and commitments Swiss Life Asset Managers Luxembourg's considers the PAIs on Greenhouse Gas Emissions in Table 1 and Table 2 below as the main PAIs of the reference period.

The prioritization of PAIs (and PAI-derived key performance indicators (KPIs)), and the related metrics applied, may vary between asset classes.

Swiss Life Asset Managers Luxembourg's approach towards the consideration of PAI will evolve over time taking into consideration regulatory developments as well as industry best practices.

The activity of investment advice, for which Swiss Life Asset Managers Luxembourg is authorized, is not carried out. Therefore, principal adverse impacts of investment decisions on sustainability factors in investment advice are not taken into consideration. To this end, the present reporting does not include data relating to investment advice. It is not intended to consider such adverse impacts as long as Swiss Life Asset Managers Luxembourg does not carry out such activity.

Please refer to Annex 1 at the bottom of this document for the translations of the summary.<sup>1</sup>

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<sup>1</sup> English version of the summary is the legally binding version whereas the translated versions in Annex 1 are translation only.

## Description of the principal adverse impacts on sustainability factors

It should be noted that the “Actions taken, and actions planned and targets set for the next reference period” described in the table below may not necessarily cover all investments made by Swiss Life Asset Managers Luxembourg. These actions may be implemented differently depending on the ESG strategy of a portfolio and whether a product reports according to art. 6, 8 or 9 SFDR.

### Indicators applicable to investments in investee companies

Adverse sustainability indicator	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
<b>CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS</b>					
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	681,942	697,488	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>excluded issuers with more than 10% revenues deriving from activities in the thermal coal sector;</li> <li>conducted an ESG controversies assessment to exclude issuers with very severe controversies in relation to energy &amp; climate change; and</li> <li>limited overall exposure to issuers with worst adverse sustainability impacts by using a proprietary PAI model taking into account the Scope 1 GHG emissions of the issuers.</li> </ul> <p>For its <b>infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>adhered to the exclusions policy, which prohibits investing in companies active in non-renewable oil and gas as well as thermal coal above a certain threshold; and</li> <li>assessed if the company/asset monitors the carbon footprint of its operations, alignment with Net-Zero and emissions reduction targets, and if the company/asset has environmental initiatives. These</li> </ul>

						<p>assessments are carried out internally and/or through an external provider.</p> <p>For its <b>infrastructure debt</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• adhered to the exclusion policy, which prohibits financing companies active in non-renewable oil and gas as well as thermal coal above a certain threshold; and</li> <li>• assessed, based on information provided by the borrowers, if the company/project monitors the carbon footprint of its operations, alignment with Net-Zero and emissions reduction targets, and if the company/project has environmental initiatives. These assessments are carried out internally and/or through an external provider.</li> </ul> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its security, infrastructure equity and debt investments, Swiss Life Asset Managers Luxembourg will further develop the mitigation actions mentioned above.</p>
		Scope 2 GHG emissions	160,050	135,630	<p>Coverage ratio: 47%</p> <p>Non-eligibility ratio: 37%</p> <p>Unit of measure: tCO<sub>2</sub>eq</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• excluded issuers with more than 10% revenues deriving from activities in the thermal coal sector;</li> <li>• conducted an ESG controversies assessment to exclude issuers with very severe controversies in relation to energy &amp; climate change; and</li> <li>• limited overall exposure to issuers with worst adverse sustainability impacts by using a proprietary PAI model taking into account the Scope 2 GHG emissions of the issuers.</li> </ul> <p>For its <b>infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg:</p>

						<ul style="list-style-type: none"> <li>• adhered to the exclusions policy, which prohibits investing in companies active in non-renewable oil and gas as well as thermal coal above a certain threshold; and</li> <li>• assessed if the company/asset monitors the carbon footprint of its operations, alignment with Net-Zero and emissions reduction targets, and if the company/asset has environmental initiatives. These assessments are carried out internally and/or through an external provider.</li> </ul> <p>For its <b>infrastructure debt</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• adhered to the exclusion policy, which prohibits financing companies active in non-renewable oil and gas as well as thermal coal above a certain threshold; and</li> <li>• assessed, based on information provided by the borrowers, if the company/project monitors the carbon footprint of its operations, alignment with Net-Zero and emissions reduction targets, and if the company/project has environmental initiatives. These assessments are carried out internally and/or through an external provider.</li> </ul> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its security, infrastructure equity and debt investments, Swiss Life Asset Managers Luxembourg will further develop the mitigation actions mentioned above.</p>
		Scope 3 GHG emissions	3,411,214	2,984,562	<p>Coverage ratio: 47%</p> <p>Non-eligibility ratio: 37%</p> <p>Unit of measure: tCO<sub>2</sub>eq</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• excluded issuers with more than 10% revenues deriving from activities in the thermal coal sector;</li> <li>• conducted an ESG controversies assessment to exclude issuers with very severe controversies in relation to energy &amp; climate change; and</li> </ul>

					<ul style="list-style-type: none"> <li>• limited overall exposure to issuers with worst adverse sustainability impacts by using a proprietary PAI model taking into account the Scope 3 GHG emissions of the issuers.</li> </ul> <p>For its <b>infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• adhered to the exclusions policy, which prohibits investing in companies active in non-renewable oil and gas as well as thermal coal above a certain threshold; and</li> <li>• assessed if the company/asset monitors the carbon footprint of its operations, alignment with Net-Zero and emissions reduction targets, and if the company/asset has environmental initiatives. These assessments are carried out internally and/or through an external provider.</li> </ul> <p>For its <b>infrastructure</b> debt investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• adhered to the exclusion policy, which prohibits financing companies active in non-renewable oil and gas as well as thermal coal above a certain threshold; and</li> <li>• assessed, based on information provided by the borrowers, if the company/project monitors the carbon footprint of its operations, alignment with Net-Zero and emissions reduction targets, and if the company/project has environmental initiatives. These assessments are carried out internally and/or through an external provider.</li> </ul> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its security, infrastructure equity and debt investments, Swiss Life Asset Managers Luxembourg will further develop the mitigation actions mentioned above.</p>	
		Total GHG emissions	4,377,446	3,856,549	Coverage ratio: 49%	<b>Current reference period (1.1.2023 – 31.12.2023)</b>

					<p>Non-eligibility ratio: 37%</p> <p>Unit of measure: tCO2eq</p>	<p>For its <b>securities, infrastructure debt and infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg has taken the actions described above (Scope 1, 2 and 3 GHG emissions) in order to manage total GHG emissions.</p> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its <b>securities, infrastructure debt and infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg will continue to implement the measures described above (Scope 1, 2 and 3 GHG emissions) in order to manage total GHG emissions.</p>
	2. Carbon footprint	Carbon footprint	202.8	245.8	<p>Coverage ratio: 28%</p> <p>Non-eligibility ratio: 37%</p> <p>Unit of measure: tCO2eq/ mEUR of revenue</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• excluded issuers with more than 10% revenues deriving from activities in the thermal coal sector;</li> <li>• conducted an ESG controversies assessment to exclude issuers with very severe controversies in relation to energy &amp; climate change; and</li> <li>• limited overall exposure to issuers with worst adverse sustainability impacts by using a proprietary PAI model taking into account the carbon footprint of the issuers.</li> </ul> <p>For its <b>infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• adhered to the exclusions policy, subject to a threshold, with respect to investing in companies active in non-renewable oil and gas and coal;</li> <li>• assessed the company/asset environmental initiatives via the internal and external ESG assessments; and</li> <li>• assessed whether the company/asset monitors carbon footprint of its operations, alignment with Net-Zero and emissions reduction targets, its environmental initiatives via the internal and external ESG assessments.</li> </ul>

						<p>For its <b>infrastructure debt</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• adhered to the exclusion policy, which prohibits financing companies active in non-renewable oil and gas as well as thermal coal above a certain threshold; and</li> <li>• assessed, based on information provided by the borrowers, if the company/project monitors the carbon footprint of its operations, alignment with Net-Zero and emissions reduction targets, and if the company/project has environmental initiatives. These assessments are carried out internally and/or through an external provider.</li> </ul> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its security, infrastructure equity and debt investments, Swiss Life Asset Managers Luxembourg will further develop the mitigation actions mentioned above.</p>
	3. GHG intensity of investee companies	GHG intensity of investee companies	547.8	986.6	<p>Coverage ratio: 30%</p> <p>Non-eligibility ratio: 37%</p> <p>Unit of measure: tCO<sub>2</sub>eq/ mEUR of revenue</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• excluded issuers with more than 10% revenues deriving from activities in the thermal coal sector; and</li> <li>• conducted an ESG controversies assessment to exclude issuers with very severe controversies in relation to energy &amp; climate change; and</li> <li>• limited overall exposure to issuers with worst adverse sustainability impacts by using a proprietary PAI model taking into account the GHG intensity of the issuers.</li> </ul> <p>For its <b>infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• adhered to the exclusions policy, subject to a threshold, with respect to investing in companies</li> </ul>



						<p>active in non-renewable oil and gas, coal, and nuclear sectors; and</p> <ul style="list-style-type: none"> <li>assessed whether the company/asset monitors carbon footprint of its operations, alignment with Net-Zero and emissions reduction targets, its environmental initiatives via the internal and external ESG assessments.</li> </ul> <p>For its <b>infrastructure debt</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>adhered to the exclusion policy, which prohibits financing companies active in non-renewable oil and gas as well as thermal coal above a certain threshold; and</li> <li>assessed, based on information provided by the borrowers, if the company/project monitors the carbon footprint of its operations, alignment with Net-Zero and emissions reduction targets, and if the company/project has environmental initiatives. These assessments are carried out internally and/or through an external provider.</li> </ul> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its security, infrastructure equity and debt investments, Swiss Life Asset Managers Luxembourg will further develop the mitigation actions mentioned above.</p>
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	6.7%	7.8%	<p>Coverage ratio: 52%</p> <p>Non-eligibility ratio: 37%</p> <p>Unit of measure: Percentage that has active fossil fuel sector exposure</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>excluded issuers with more than 10% revenues deriving from activities in the thermal coal sector; and</li> <li>conducted an ESG controversies assessment to exclude issuers with very severe controversies in relation to energy &amp; climate change; and</li> <li>limited overall exposure to issuers with worst adverse sustainability impacts by using a proprietary PAI</li> </ul>

						<p>model taking into account the share of investments in companies active in the fossil fuel sector.</p> <p>For its <b>infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• adhered to the exclusions policy, subject to a threshold, with respect to investing in companies active in non-renewable oil and gas, coal, and nuclear sectors; and</li> <li>• assessed whether the company/asset derived revenues from exploration, mining, extraction, production, processing, storage, refining or distribution of fossil fuels via the internal and external ESG assessments.</li> </ul> <p>For its <b>infrastructure</b> debt investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• adhered to the exclusion policy and to defined thresholds with respect to financing companies active in oil and gas, coal, and nuclear sectors; and</li> <li>• assessed, based on information provided by the borrowers, whether the company/project, derives value from exploration, production, transportation, storage or refining of fossil fuels, via the internal and, where available, external ESG assessments.</li> </ul> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its security, infrastructure equity and debt investments, Swiss Life Asset Managers Luxembourg will further develop the mitigation actions mentioned above.</p>
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy	35%	42%	<p>Coverage ratio: 21%</p> <p>Non-eligibility ratio: 86%</p> <p>Unit of measure: Percentage of non-renewable energy</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• limited overall exposure to issuers with worst adverse sustainability impacts by using a proprietary PAI model taking into account the share of non-renewable energy consumption and production.</li> </ul>

		sources, expressed as a percentage of total energy sources			consumption production	<p>For its <b>infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>assessed renewable/ non-renewable energy consumption and production, as well as internal practices to monitor resource consumption via the internal and external ESG assessments.</li> </ul> <p>For its <b>infrastructure debt</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>assessed, based on information provided by the borrowers, practices of the company/project with respect to energy consumption and share of renewable energy in the mix, via the internal, and where available, external ESG assessments.</li> </ul> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its security, infrastructure equity and debt investments, Swiss Life Asset Managers Luxembourg will further develop the mitigation actions mentioned above.</p>
6.	Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	0.265	0.258	<p>Coverage ratio: 9%</p> <p>Non-eligibility ratio: 37%</p> <p>Unit of measure: GWh/ mEUR of revenue</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>limited overall exposure to issuers with worst adverse sustainability impacts by using a proprietary PAI model taking into account the energy consumption intensity of investee companies in high impact climate sector.</li> </ul> <p>For its <b>infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>assessed if the company/asset operated in the high-impact sectors and assessed its energy consumption via the internal and external ESG assessments.</li> </ul> <p>For its <b>infrastructure debt</b> investments, Swiss Life Asset Managers Luxembourg:</p>

						<ul style="list-style-type: none"> <li>assessed, based on information provided by the borrowers, if the company/project operates in a high impact climate sector, and if the company/project has solid practices with respect to energy consumption, via the internal, and where available, external ESG assessments.</li> </ul> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its security, infrastructure equity and debt investments, Swiss Life Asset Managers Luxembourg will further develop the mitigation actions mentioned above.</p>
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	1.75%	3.17%	<p>Coverage ratio: 3%</p> <p>Non-eligibility ratio: 37%</p> <p>Unit of measure: Percentage that has operations located in biodiversity sensitive areas and is involved in controversies with severe impact on the environment</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>conducted an ESG controversies assessment to exclude issuers with very severe controversies in relation to biodiversity &amp; land use; and</li> <li>limited overall exposure to issuers with worst adverse sustainability impacts by using a proprietary PAI model taking into account the share of investments in issuers with sites/operations located in or near to biodiversity sensitive areas where activities of issuers negatively affect those areas.</li> </ul> <p>For its <b>infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>adhered to the exclusions policy with respect to various activities involved in destruction of critical habitats; and</li> <li>assessed if the company/asset analyses its impact on biodiversity and whether its operations negatively impact biodiversity-sensitive areas.</li> </ul> <p>For its <b>infrastructure debt</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>assessed, based on information provided by the borrowers, if the company/project operations may</li> </ul>

						<p>have a negative impact on biodiversity, via the internal and where available, external ESG assessments.</p> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its security, infrastructure equity and debt investments, Swiss Life Asset Managers Luxembourg will further develop the mitigation actions mentioned above.</p>
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.2	7.2	<p>Coverage ratio: 2%</p> <p>Non-eligibility ratio: 37%</p> <p>Unit of measure: tonnes/ mEUR</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• conducted an ESG controversies assessment to exclude issuers with very severe controversies in relation to toxic emissions and waste; and</li> <li>• limited overall exposure to issuers with worst adverse sustainability impacts by using a proprietary PAI model taking into account the tonnes of emissions of water generated by the issuers.</li> </ul> <p>For its <b>infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• assessed if the company/asset measured its water use and emissions to water.</li> </ul> <p>For its <b>infrastructure debt</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• assessed, based on information provided by the borrowers, the company/project practices in terms of emissions to water (where relevant depending on the project activity sector) via the internal and where available, external ESG assessments.</li> </ul> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its security, infrastructure equity and debt investments, Swiss Life Asset Managers Luxembourg will further develop the mitigation actions mentioned above.</p>

Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	1.9	2.9	<p>Coverage ratio: 10%</p> <p>Non-eligibility ratio: 37%</p> <p>Unit of measure: tonnes/ mEUR</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• conducted an ESG controversies assessment to exclude issuers with very severe controversies in relation to toxic emissions and waste and impact on communities; and</li> <li>• limited overall exposure to issuers with worst adverse sustainability impacts by using a proprietary PAI model taking into account the tonnes of hazardous waste and radioactive waste generated by the issuers.</li> </ul> <p>For its <b>infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• adhered to the exclusions policy with respect to businesses linked to the generation of radioactive waste (e.g. trade in hazardous material such as radioactive materials); and</li> <li>• assessed if the company/asset measured its waste production and generated hazardous waste.</li> </ul> <p>For its <b>infrastructure debt</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• assessed, based on information provided by the borrowers, the company/project practices in terms of hazardous waste (where relevant depending on the project activity sector) via the internal and where available, external ESG assessments.</li> </ul> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its security, infrastructure equity and debt investments, Swiss Life Asset Managers Luxembourg will further develop the mitigation actions mentioned above.</p>
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## INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.03%	0.04%	<p>Coverage ratio: 29%</p> <p>Non-eligibility ratio: 37%</p> <p>Unit of measure: Percentage that has very severe violation of the UN Global Compact principles</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>excluded issuers involved in controversies related to violation of the UNGC principles; and</li> <li>limited overall exposure to issuers with worst adverse sustainability impacts by using a proprietary PAI model taking into account the share of investments in issuers involved in violations of the UNGC principles or OECD Guidelines for MNEs.</li> </ul> <p>For its <b>infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>adhered to the exclusions policy with respect to business involved in the use of harmful or exploitative forms of forced labor and/or child labor, corruption or any corrupt practices and production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements; and</li> <li>assessed if the company/asset has processes in place to monitor compliance with the UNGC principles and the OECD Guidelines for MNEs and whether any violations of these principles have been recorded in the past three years.</li> </ul> <p>For its <b>infrastructure debt</b> investments Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>assessed, based on information provided by the borrowers, the company/project practices in terms of compliance with UNGC principles or OECD guidelines (or, if not applicable in case of pure project companies of limited size, compliance with relevant</li> </ul>
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						<p>equivalent applicable laws) via the internal and where available, external ESG assessments.</p> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its security, infrastructure equity and debt investments, Swiss Life Asset Managers Luxembourg will further develop the mitigation actions mentioned above.</p>
	<p>11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises</p>	<p>Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises</p>	<p>15.8%</p>	<p>17.4%</p>	<p>Coverage ratio: 28%</p> <p>Non-eligibility ratio: 37%</p> <p>Unit of measure: Percentage that has no evidence of mechanism to monitor compliance with the UN Global Compact</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• limited overall exposure to issuers with worst adverse sustainability impacts by using a proprietary PAI model taking into account the share of investments in issuers without policies to monitor compliance with the UNGC principles or OECD Guidelines for MNEs.</li> </ul> <p>For its <b>infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• assessed if the company/asset has processes in place to monitor compliance with the UNGC principles and the OECD Guidelines for MNEs and whether any violations of these principles have been recorded in the past three years.</li> </ul> <p>For its <b>infrastructure debt</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• assessed, based on information provided by the borrowers, the company/project practices in terms of processes to monitor compliance with UNGC principles or OECD guidelines (or, if not applicable in case of pure project companies of limited size, compliance with relevant equivalent applicable laws) via the internal and where available, external ESG assessments.</li> </ul> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p>



						For its securities investments, infrastructure equity investments and infrastructure debt investments, Swiss Life Asset Managers Luxembourg will further develop the mitigation actions mentioned above.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	8.7%	9.8%	Coverage ratio: 9% Non-eligibility ratio: 37% Unit of measure: Gender Pay Gap ratio	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• limited overall exposure to issuers with worst adverse sustainability impacts by using a proprietary PAI model taking into account the average unadjusted gender pay gap of the issuer.</li> </ul> <p>For its <b>infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• assessed if the company/asset had a diversity and inclusion policy in place, current diversity at the board, and gender pay gap via the internal and external ESG assessments.</li> </ul> <p>For its <b>infrastructure debt</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>• assessed, based on information provided by the borrowers, the company/project practices in terms of diversity and inclusion and gender pay gap (when applicable, as limited size pure project companies may not have any direct employees) via the internal and where available, external ESG assessments.</li> </ul> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its security, infrastructure equity and debt investments, Swiss Life Asset Managers Luxembourg will further develop the mitigation actions mentioned above.</p>
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a	35.6%	34.5%	Coverage ratio: 30% Non-eligibility ratio: 37%	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments, Swiss Life Asset Managers Luxembourg:</p>

		percentage of all board members			Unit of measure: Female directors percentage	<ul style="list-style-type: none"> <li>limited overall exposure to issuers with worst adverse sustainability impacts by using a proprietary PAI model taking into account the average ratio of female to male board members of the issuer.</li> </ul> <p>For its <b>infrastructure equity</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>assessed if the company/asset had a diversity and inclusion policy in place, current diversity at board level, and gender pay gap via the internal and external ESG assessments.</li> </ul> <p>For its <b>infrastructure debt</b> investments, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>assessed, based on information provided by the borrowers, the company/project practices in terms of diversity (when applicable, as limited size pure project companies may not have a dedicated board) via the internal and where available, external ESG assessments.</li> </ul> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its security, infrastructure equity and debt investments, Swiss Life Asset Managers Luxembourg will further develop the mitigation actions mentioned above.</p>
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.0001%	0.0001%	<p>Coverage ratio: 28%</p> <p>Non-eligibility ratio: 37%</p> <p>Unit of measure: Percentage that have exposure to controversial weapons (landmines, cluster munitions, chemical weapons and biological weapons)</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments, Swiss Life Asset Managers Luxembourg:</p> <p>excluded issuers involved in the direct or indirect production of nuclear weapons (including intended-use components, warheads and missiles), biological &amp; chemical weapons (including components, systems), landmines and cluster munitions. For its <b>infrastructure equity and debt</b> investments, Swiss Life Asset Managers Luxembourg:</p>

						<ul style="list-style-type: none"> <li>adhered to the exclusions policy with respect to any business involved in the manufacturing or selling of cluster ammunition, land mines or similar weapons.</li> </ul> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its security, infrastructure equity and debt investments, Swiss Life Asset Managers Luxembourg will further develop the mitigation actions mentioned above.</p>
<b>Indicators applicable to investments in sovereigns and supranationals</b>						
Adverse sustainability indicator	Metric	2023	2022	Explanation	Actions taken, and actions planned and targets set for the next reference period	
Environmental	15. GHG intensity	GHG intensity of investee countries	15.4	3.9	<p>Coverage ratio: 3%</p> <p>Non-eligibility ratio: 94%</p> <p>Unit of measure: tCO<sub>2</sub>eq/ mEUR</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments in <b>sovereign and supranationals issuers</b>, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>excluded countries that have the highest GHG intensity, or did not commit to the Paris Agreement, or did not ratify the Convention on Biological Diversity.</li> </ul> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its <b>securities</b> investments in <b>sovereign and supranationals issuers</b>, Swiss Life Asset Managers Luxembourg will exclude countries which, amongst other indicators, present high level of GHG intensity.</p>
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles	0	0	<p>Coverage ratio: 6%</p> <p>Non-eligibility ratio: 94%</p> <p>Unit of measure: Percentage of portfolio sovereign issuers with</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments in <b>sovereign and supranationals issuers</b>, Swiss Life Asset Managers Luxembourg:</p> <ul style="list-style-type: none"> <li>excluded countries subject to social violations of the main ILO Conventions.</li> </ul> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p>

		and, where applicable, national law			European Union sanctions	For its <b>securities</b> investments in <b>sovereign and supnationals issuers</b> , Swiss Life Asset Managers Luxembourg will continue to exclude countries which, amongst other indicators, are subject to social violations of the main ILO Convention.
<b>Indicators applicable to investments in real estate assets</b>						
Adverse sustainability indicator	Metric	2023	2022	Explanation	Actions taken, and actions planned and targets set for the next reference period	
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	0.01%	0.01%	Coverage ratio: 30% Non-eligibility ratio: 70% Unit of measure: Percentage of exposure to fossil fuels	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>real estate</b> investments, Swiss Life Asset Managers Luxembourg has included the PAI indicator on fossil fuel exposure in the due diligence process of each property acquisition without any pre-determined threshold.</p> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its <b>real estate</b> investments, Swiss Life Asset Managers Luxembourg will continue to measure this PAI indicator in its due diligence process. For products reporting according to art. 8 or 9 SFDR, in addition to the above, Swiss Life Asset Managers Luxembourg has defined portfolio level thresholds by 2030.</p>
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	47,86%	45,53%	Coverage ratio: 83% Eligibility ratio: 76% The PAI value is calculated dividing the sum of inefficient real estate asset values by the sum of eligible real estate asset values.	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>real estate investments</b>, Swiss Life Asset Managers Luxembourg has included the PAI indicator on energy efficiency in the due diligence process of each property acquisition without any pre-determined threshold.</p> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its <b>real estate investments</b>, Swiss Life Asset Managers Luxembourg will continue to measure this PAI indicator in its due diligence process. For products reporting according to art. 8 or 9 SFDR, in addition to the above, Swiss Life Asset Managers Luxembourg has defined portfolio level thresholds</p>

					<p>The eligibility ratio is calculated dividing the sum of eligible real estate assets by the total value of real estate assets.</p> <p>The coverage ratio is calculated dividing the sum of eligible real estate assets excluding those with no EPC by the total value of the eligible real estate assets.</p> <p>Unit of measure: Energy-inefficiency percentage based on EPC</p>	by 2030. In addition, we plan constructive and/or operational measures to improve energy efficiency where appropriate, and calculate the impact of our planned measures using available investment/project information.
<b>Other indicators for principal adverse impacts on sustainability factors</b>						
<b>ADDITIONAL CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS</b>						
<b>Adverse sustainability indicator</b>	<b>Metric</b>	<b>2023</b>	<b>2022</b>	<b>Explanation</b>	<b>Actions taken, and actions planned and targets set for the next reference period</b>	
<b>Indicators applicable to investments in real estate assets</b>						
Greenhouse gas emissions	18. GHG emissions	Scope 1 GHG emissions generated by real estate assets	21,739	18,623	<p>Coverage ratio: 27%</p> <p>Non-eligibility ratio: 73%</p> <p>Unit of measure: tCO<sub>2</sub>eq</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>real estate</b> investments, Swiss Life Asset Managers Luxembourg has included an assessment of carbon intensity of the property (GHG Emissions/m<sup>2</sup>) in the due diligence process of each property acquisition.</p> <p>For our standing portfolio we monitor GHG scope 1 emissions. In addition, we take constructive and/or operational measures to reduce GHG emissions where</p>

					<p>appropriate, and calculate the impact of our planned measures using available investment/project information. To promote a GHG emissions reducing tenant behaviour, we have started to introduce green lease clauses.</p> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its <b>real estate</b> investments, Swiss Life Asset Managers Luxembourg will continue to implement the measures described above.</p>
		Scope 2 GHG emissions generated by real estate assets	22,397	24,607	<p>Coverage ratio: 27%</p> <p>Non-eligibility ratio: 73%</p> <p>Unit of measure: tCO<sub>2</sub>eq</p> <p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>real estate</b> investments, Swiss Life Asset Managers Luxembourg has included an assessment of carbon intensity of the property (GHG Emissions/m<sup>2</sup>) in the due diligence process of each property acquisition. For our standing portfolio we monitor GHG scope 2 emissions. In addition, we take constructive and/or operational measures to reduce GHG emissions where appropriate, and calculate the impact of our planned measures using available investment/project information. To promote a GHG emissions reducing tenant behaviour, we have started to introduce green lease clauses.</p> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its <b>real estate</b> investments, Swiss Life Asset Managers Luxembourg will continue to implement the measures described above.</p>
		Scope 3 GHG emissions generated by real estate assets	23,867	23,741	<p>Coverage ratio: 27%</p> <p>Non-eligibility ratio: 73%</p> <p>Unit of measure: tCO<sub>2</sub>eq</p> <p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>real estate</b> investments, Swiss Life Asset Managers Luxembourg has included an assessment of carbon intensity of the property (GHG Emissions/m<sup>2</sup>) in the due diligence process of each property acquisition. For our standing portfolio we monitor GHG scope 3 emissions (including tenant energy use, excluding embodied carbon). In addition, we take operational measures to reduce GHG emissions where appropriate, and calculate the impact of our planned measures using available investment/project information. To</p>

						<p>promote a GHG emissions reducing tenant behaviour, we have started to introduce green lease clauses.</p> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its <b>real estate</b> investments, Swiss Life Asset Managers Luxembourg will continue to implement the measures described above.</p>
		Total GHG emissions generated by real estate assets	68,003	66,972	<p>Coverage ratio: 27%</p> <p>Non-eligibility ratio: 73%</p> <p>Unit of measure: tCO2eq</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>real estate</b> investments, Swiss Life Asset Managers Luxembourg has taken the actions described above (Scope 1, 2 and 3 GHG emissions generated by real estate assets) in order to manage total GHG emissions.</p> <p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its <b>real estate</b> investments, Swiss Life Asset Managers Luxembourg will continue to implement the measures described above (Scope 1, 2 and 3 GHG emissions generated by real estate assets) to manage total GHG emissions.</p>
<b>ADDITIONAL INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS</b>						
<b>Adverse sustainability indicator</b>	<b>Metric</b>		<b>2023</b>	<b>2022</b>	<b>Explanation</b>	<b>Actions taken, and actions planned and targets set for the next reference period</b>
<b>Indicators applicable to investments in Sovereign Issuers</b>						
Governance	21. Average corruption score	Measure of the perceived level of public sector corruption using a quantitative indicator explained in the explanation column	98.2	99.5	<p>Coverage ratio: 3%</p> <p>Non-eligibility ratio: 94%</p> <p>Definition: The Corruption Perception Index (CPI) is sourced from our Third-Party</p>	<p><b>Current reference period (1.1.2023 – 31.12.2023)</b></p> <p>For its <b>securities</b> investments in <b>sovereign and supnationals issuers</b>, Swiss Life Asset Managers Luxembourg excluded countries that do not provide a safe, reliable and sustainable environment for their population and institutions. Countries are evaluated through a proprietary methodology which, amongst others indicators, takes into account the corruption perception index of the country.</p>

				<p>Data provider (MSCI) which reflects the country scores directly from Transparency International. Each country's score is a combination of at least 3 data sources drawn from 13 different corruption surveys and assessments. These data sources are collected by a variety of institutions, including the World Bank and the World Economic Forum. The CPI measures public sector corruption worldwide. As it combines many different manifestations of corruption into one globally comparable indicator, it provides a more comprehensive picture of the perceived level of public sector corruption situation in a particular country than each source taken separately</p>	<p><b>Next reference period (1.1.2024 – 31.12.2024)</b></p> <p>For its <b>securities</b> investments in <b>sovereign and supranationals issuers</b>, Swiss Life Asset Managers Luxembourg will continue to exclude countries with a negative evaluation.</p>
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					Unit of measure: The CPI is measured on a range between 0 and 100, where countries with a higher score are perceived to be less corrupt than countries with a lower score.	

**Description of policies to identify and prioritise principal adverse impacts on sustainability factors**

As part of its approach towards responsible investing Swiss Life Asset Managers Luxembourg has defined and implemented, through the adoption of a dedicated ‘PAI Policy’, a set of methodologies specific for each asset class (i.e. Securities, Real Estate, Infrastructure Equity and Infrastructure Debt) to identify, prioritize, measure, monitor and mitigate PAI indicators. The latest version of the ‘PAI Policy’ has been approved by the Management Committee of Swiss Life Asset Managers Luxembourg on 27.06.2024.

The PAI policy, for which the Risk Management Function is responsible, assigns roles and responsibilities in relation to the identification, prioritization, measurement, monitoring and mitigation of the PAIs within the organization as follows:

- The *Executive Committee* ensures that PAIs are factored and considered in business strategy, risk appetite and risk management framework.
- The *ESG Board* ensures, develops, and further improves Swiss Life Asset Managers’ approach to responsible investment, including PAIs.
- The *ESG Committees* are responsible to discuss and decide on the incorporation of ESG aspects, including PAIs, into the investment process. The ESG Committees are responsible with respect to their respective asset class for the identification of PAI indicators, the prioritization based on their materiality and regular reviews, ensuring the correct update of the list of PAI. The

ESG Securities Committee is also responsible for the review and approval of Swiss Life Asset Manager's proprietary PAI scoring model.

- The *ESG Team* is responsible for the maintenance of PAI related methodological documents and their submission for approval to the ESG Committees. In addition, the ESG Team is responsible for the definition of PAI data quality requirements, for the selection of reliable data sources and data providers and for the support in the integration of PAI data in the current Swiss Life Asset Managers' data architecture. The *local Risk Management Function* support local business units in the analysis and implementation of country specific obligations.
- The *Divisional Risk Management Function* is responsible at divisional level for the division-wide governance on PAI integration into the risk management process shaping the approach on internal PAI monitoring and reporting, for the drafting of the PAI Policy and for the annual review and update thereof. The *local Risk Management Function* is responsible to integrate PAI monitoring activities in its usual risk management processes.
- The *Divisional Legal & Compliance* is responsible for the monitoring of the development of relevant sustainability-related publications regarding SFDR implementation on EU Level. The *local Legal & Compliance* is responsible to monitor local implementation and regulation of such disclosures and timelines.
- The *Portfolio Management* is responsible to integrate the PAI thresholds in its operational business and to conduct pre-trade checks and, in relation to investments in infrastructure, to perform the PAI assessment.
- The *Financial Engineering Team* is responsible for constructing, updating, and maintaining Swiss Life Asset Manager's proprietary PAI scoring model for securities and, with the support of the ESG Team for the maintenance of the related internal documentation.

#### **Methodologies to select additional PAI indicators, to identify and assess PAIs, including any margin of error for PAIs**

Swiss Life Asset Managers Luxembourg identifies additional PAI indicators based on its current ESG strategy and sustainable investment approach applied to selected products (depending on asset classes) and sectoral exposure. The list of PAI indicators which Swiss Life Asset Managers Luxembourg considers, is reviewed at least annually by the asset class specific teams and is updated accordingly to reflect any change in Swiss Life Asset Managers' and Swiss Life Asset Managers Luxembourg's sustainability priority. Swiss Life Asset Managers Luxembourg also takes into account data coverage and data quality and availability when selecting

additional PAI indicators. At this stage, Swiss Life Asset Managers Luxembourg's existing internal methodology does not take into account the probability of occurrence and the severity of those principal adverse impacts, including their potentially irremediable character.

Apart from the PAI indicators identified as mandatory by SFDR, Swiss Life Asset Managers Luxembourg selected, based on the above explained methodology, the following additional PAIs:

- Table 2, PAI 18. GHG emissions  
The global real estate sector accounts for a major share of global GHG emissions. Therefore, Swiss Life Asset Managers Luxembourg has identified the PAI as material in real estate and accordingly, defined a strategic priority to reduce related negative impacts as Swiss Life Asset Managers Luxembourg.
- Table 3, PAI 21. Average corruption score  
The average corruption score was selected for three reasons: i) The mandatory PAIs for sovereigns focus only on environmental and social factors. The selection of this indicator, which focuses on the governance aspects of sovereign issuers, therefore complements the mandatory PAIs for sovereigns. ii) The data quality and availability for this PAI is satisfactory and iii) fostering business integrity is part of Swiss Life Asset Managers' focus areas, hence average corruption score was a relevant indicator to consider.

Swiss Life Asset Managers Luxembourg measures and monitors the PAI indicators for investments' underlying portfolios across all asset classes (subject to an indicator's applicability to an investment type). While doing this, Swiss Life Asset Managers Luxembourg, acknowledges that different asset classes, investment portfolios' specific investment strategies and whether a product falls within the scope of art. 8 or 9 SFDR might influence their mitigation at product level.

For **investment portfolios with investments in securities**, Swiss Life Asset Managers Luxembourg measures PAI through a proprietary methodology developed by Swiss Life Asset Managers that aggregates the values of PAI indicators at issuer level into a single PAI score. The PAI score summarises the severity of the company's principal adverse sustainability impacts across all considered PAI indicators. A higher PAI score indicates a more severe principal adverse impact. The PAI score is then addressed for products reporting according to art. 8 and 9 SFDR. Exposure in issuers with worst adverse sustainability impacts, according to the PAI

Score, is limited by either i) excluding the bottom 5% or ii) beating the reference index by holding less bottom 10% and bottom 5% than the reference index. Details regarding our methodology can be found in our [Responsible Investment Policy](#).

The main limitation of the proprietary PAI model is that some of the underlying data is not available, which means that not all issuers are assessed with the same level of initial raw information.

In addition to the PAI mitigation through the application of the PAI score model, mitigation activities include, for sub-funds which fall within the scope of Article 8 and Article of SFDR, different types of exclusions and sustainability safeguards as described in our [Responsible Investment Policy](#).

For the PAIs applicable to investments in sovereigns and supranationals, Swiss Life Asset Managers Luxembourg complements MSCI data on country GHG intensity with an environmental assessment also considering countries that did not commit to the Paris Agreement objective or ratified the Convention on Biological Diversity regarding the Environmental PAI (PAI 15 GHG intensity). For the social PAI, Swiss Life Asset Managers Luxembourg relies on public sources to assess countries subject to social violations of the main ILO conventions (PAI 16 investee countries subject to social violations). The margin of error depends on the quality of the source.

For **investment portfolios with investments in real estate assets**, Swiss Life Asset Managers Luxembourg measures and monitors the relevant PAI information for products falling within the scope of art. 6, 8 and 9 SFDR through an ESG assessment (ESG Due Diligence). For products falling within the scope of art. 8 and art. 9 SFDR, PAIs 17 (exposure to fossil fuels through real estate assets, Table 1) and PAI 18 (exposure to energy-inefficient real estate assets, Table 1) are assessed at the asset level to check for their impact on the portfolio level.

While PAI 17 of Table 1 can be assessed with relatively high accuracy by simply identifying the property type, a margin of error may exist in cases where the data on PAI 18 of Table 1 (EPC level) is not available and has to be estimated based on benchmark models. The margin of error can be up to maximal 2 EPC levels (e.g. E instead of C) if the provided data was correct. Consequently, the share of not inefficient assets (EPC A and B) has a margin of error. Also, it shall be noted that the methodological improvement and harmonization of EPC standards along different European countries is subject to ongoing efforts of working groups including different related European stakeholders.

The optional PAI of Table 2 CO2 Emissions (PAI 18) is created using energy meter data, energy bills or reports from the Utility Providers. If data is not available, the previous year's values are used as a priority to fill the gaps. Secondly, EPC information is used

for estimation purposes where possible. If this is also not possible, a local benchmark value is used (a more detailed description must be agreed with the risk manager involved at Swiss Life Asset Managers Luxembourg). The margin of error depends on the quality of the source and if required from the estimation methodology.

Next to the above mentioned aspects linked to the PAI 17 and 18 of Table 1 and PAI 18 of Table 2, our ESG assessment may be exposed to the following general uncertainties: Assets are usually reviewed by a Technical Due Diligence (TDD) expert who produces a TDD report including assumptions and uncertainties (even if all relevant aspects are covered) that can lead to errors. Our internal ESG Assessment incorporates a methodology which also includes assumptions and derives a rating that may generate significant biases in favour of, or against it, since it is not able to include all building specific aspects.

In addition, for mandatory PAI 18 of Table 1 SFDR RTS (Exposure to energy-inefficient real estate assets) and the additional climate and other environment-related PAI 18 in Table 2 (GHG emissions) we use the methodology provided by the carbon risk real estate monitor (CRREM) to maintain our mitigation activities.

The mitigation activities for real estate investments cover the whole property investment cycle and include alignment of current and future portfolio investments to decarbonization pathways and exercise of engagement activities for the reduction of carbon emissions and energy consumption (e.g., green leases) when appropriate.

For **investment portfolios with investments in infrastructure equity**, Swiss Life Asset Managers Luxembourg measures PAI for products falling within the scope of art. 6, art. 8 and art. 9 SFDR in a pre-transaction ESG assessment (PAI assessment) and monitors them across its portfolio companies as part of a regular post-transaction risk monitoring activities.

The limitations to select, identify and assess PAIs come from the data quality of the inputs provided by the assets, the direct reliance on their reporting and accounting methods, and the timeline for PAI reporting which does not always fit assets' annual disclosure of ESG KPIs. Further, within co-investments there might be limited opportunities to request extensive ESG data due to governance limitations. Swiss Life Asset Managers Luxembourg generally does not use estimates in this context. Swiss Life Asset Managers Luxembourg relies on information delivered by the underlying assets to calculate PAIs. The margin of error depends on the quality of the source.

Mitigation activities for infrastructure equity investments include exclusion of companies exposed to controversial and/or illicit sectors, pre-trade due diligence, and exercise of engagement activities for the improvement of ESG practices (e.g., decarbonisation, protection of biodiversity, diversity and inclusion) among our investments when appropriate.

For **investment portfolios with investments in infrastructure debt**, Swiss Life Asset Managers Luxembourg measures PAI for its product reporting falling within the scope of art. 8 SFDR and mitigates it through exclusions and pre-trade due diligence.

The limitations to assess PAIs come from the data quality of the inputs provided by the borrowers, our direct reliance on their own reporting and accounting methods, the absence of contractual obligations for the borrowers to provide the required data, the absence of monitoring of some metrics in the absence of appropriate internal processes at the borrowers' level, the fact that some PAIs may not be fully relevant for some borrowers (e.g. gender pay gap for project companies having only 1 employees) and the timing for the availability of the PAI data on the borrowers' side not fitting with the PAI reporting timeline. Swiss Life Asset Managers Luxembourg does not use estimates in this context. Swiss Life Asset Managers Luxembourg relies exclusively on information delivered by the underlying assets to calculate our scores. The margin of error depends on the quality of the source.

#### **Measurement of PAI indicators at 'aggregated level'**

Based on the definition of 'all investments' expressed in the Q&A of 17 November 2022 on the application of the SFDR Delegated Regulation by the European Supervisory Authorities, we understand 'all investments' as both direct and indirect investments funding investee companies or sovereign through funds, funds of funds, bonds, equity, derivatives, loans, deposits and cash or any other securities or financial contracts.

#### **Eligibility Ratio**

Based on the applicability of a PAI indicator, any investment can fall into the categories (1) investee companies, (2) sovereigns and supranationals, (3) real estate or (4) others. Therefore,

- for any PAIs applicable to investee companies, any investment not being made into an investee company is considered as not eligible.
- for any PAIs applicable to sovereigns and supranationals, any investment not being made into a sovereign and supranational is considered as not eligible.
- for any PAIs applicable to real estate, any investment not being made into real estate is considered as not eligible.

The portion of investments defined as eligible for that particular PAI, out of the sum of all investments (except for the PAI 18 in which it is the the total value of real estate assets) is displayed in the 'eligibility ratio'. All investments made into not eligible assets are considered as having 'no adverse impact' for that particular PAI.

### **Data Coverage Ratio**

The portion of data coverage is defined as the portion of investments for which the PAI indicator relevant data is available out of the sum of all investments (except for the PAI 18 in which it is the total value of the eligible real estate assets). Therefore, the 'data coverage ratio' does not directly relate to the 'eligible ratio'.

Where data about the adverse impact related to an 'eligible' investment for a PAI is not made publicly available, nor estimated by our current third-party data provider (e.g., PAI data is missing), the assumption chosen is to proxy by the portfolio's average of the available eligible values.

### **Data sources**

Swiss Life Asset Managers Luxembourg relies on different data sources depending on each asset class. For all asset classes, data availability is dependent on companies/assets/investments disclosing the respective information, especially outside of the EU, where regulatory requirements might be different. Estimates may be used when relying on data, please refer to the asset-class specific sections below for more details. By displaying the data coverage ratio Swiss Life Asset Managers Luxembourg creates transparency on the availability of data for each PAI indicator.

### **Securities**

For PAI data related to investments in securities issued by corporate and sovereign issuers, Swiss Life Asset Managers Luxembourg relies on MSCI ESG Research ("MSCI"). In relation to investments in third party funds, PAI data is provided, where available, by MSCI as well.

Further, products invested in securities issued by sovereign issuers are addressing PAIs through PAI data from MSCI which are combined with other indicators from public sources.

In 2023, based on their methodology document from December 2022, MSCI used corporate reported data for every PAIs, except for PAIs 1, 2, 3, where they also relied on estimated data, when corporate disclosures were not available.

### **Real estate**

For Swiss Life Asset Managers Luxembourg, PAI data for real estate assets are provided, by internal or external property management companies which are responsible for collecting consumption data at asset level and for providing it to Swiss Life Asset Managers as part of their duties under service agreements. Estimation methods were developed and implemented to be able to make statements on currently missing data and thus achieve more stable reporting. These consider both the existing standards and guidelines of the countries as well as consumption values from previous years. The same applies to missing energy efficiency classes, which do not necessarily have to be documented for regulatory purposes. Notwithstanding, as the market develops, it is possible that data sources will evolve, and smart metering solutions or big data companies will start to deliver this type of service.

### **Infrastructure**

With regard to infrastructure equity, Swiss Life Asset Managers Luxembourg exclusively relies on data provided by the portfolio companies. Swiss Life Asset Managers Luxembourg collects the PAI data related to its infrastructure investments with the help of internal monitoring systems as part of the investment due diligence and portfolio monitoring processes. In case of any doubts or uncertainties related to the provided data, we engage with the portfolio companies and other shareholders to discuss these and seek clarity. Data quality is ensured through multiple levels of control, including the responsible Asset Management teams for each investment and the ESG Committee Infrastructure Equity. If data related to the reporting year is not available, the latest available data may be used as proxy, whereas annual data may be used to estimate quarterly impacts, when appropriate.

With regard to infrastructure debt, Swiss Life Asset Managers Luxembourg exclusively relies on data provided by the borrowers. Swiss Life Asset Managers Luxembourg collects the PAI data related to its infrastructure investments with the help of internal monitoring systems as part of the investment due diligence and portfolio monitoring processes. In case of any doubts or uncertainties related to the provided data, we engage with the borrowers and other shareholders to discuss these and seek clarity. If data related to the reporting year is not available, the latest available data may be used as proxy, whereas annual data may be used to estimate quarterly impacts, when appropriate.



## Engagement policies

Swiss Life Asset Managers Luxembourg uses engagement and voting as an overarching responsible investment approach, however, not for the specific purpose of reducing individual PAIs on entity level. However, individual products may still apply voting and engagement to mitigate PAIs. Swiss Life Asset Managers practices engagement on divisional level on behalf of all its Management Companies and their products.

Swiss Life Asset Managers Luxembourg has adopted an engagement policy, that covers the stewardship activities (i.e. engagement as dialogue and voting) of Swiss Life Asset Managers Luxembourg in relation to the asset classes securities (i.e. listed equity, corporate bonds), real estate, and infrastructure (equity), managed on behalf of its clients - unless a client with individual mandate has expressly chosen to opt out of this policy.

The purpose of the engagement policy is to set the fundamentals of Swiss Life Asset Managers Luxembourg stewardship activities, e.g., to provide guidance on how engagement and voting activities are exercised and to ensure consistency across the whole organization. The policy describes the relevant governance and committees, how we understand and manage conflict of interests, our approach and strategy in relation to engagement and voting activities, the escalation measures we might use, our participation in and commitment to collaborative initiatives, and lastly, our commitment to transparency through disclosure and reporting. The policy does not refer to specific PAI indicators within the meaning of Tables 1, 2, and 3 of the Annex I of the SFDR RTS and the reduction thereof.

The engagement policy of Swiss Life Asset Managers Luxembourg is available here: [Engagement policy](#).

In addition, Swiss Life Asset Managers Luxembourg has adopted a voting policy, that applies to the exercise of voting rights of listed shares managed by Swiss Life Asset Managers Luxembourg as well as for Swiss Life fund management companies who have the authority to proxy vote on behalf of collective investment schemes they manage and is limited to the exercise of voting rights resulting from financial investments. The policy sets out the general basis on governance (committees), responsibilities for the exercise of the voting activities, how we manage conflicts of interest, and goes to describing the fundamentals and principles of how we vote on topics related to operational items, board of directors, shareholders' rights, capital structure, remuneration, as well as environmental and social issues. The Policy does not refer to specific PAI indicators within the meaning of Tables 1, 2, and 3 of the Annex I of the SFDR RTS and the reduction thereof.

The voting policy of Swiss Life Asset Managers Luxembourg is available here: [Voting policy](#).

## References to international standards

Swiss Life Asset Managers Luxembourg adheres to various international initiatives which are setting standards and best practice for responsible investing in the asset management industry.

The present statement is based on the following internationally recognized standards for due diligence and reporting and are relevant to mitigate the PAIs mentioned above:

- **UN Global Compact (UNGC)**

The UN Global Compact is the world's largest initiative for corporate responsibility. The vision of the UN Global Compact is an inclusive and sustainable global economy based on ten universal principles relating to human rights, labour standards, the environment, and the fight against corruption.

**Link to PAI indicator(s):**

Table 1, PAI 10 Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises

Table 1, PAI 11 Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises

**Methodology and data used to measure adherence or alignment:**

For securities Companies' adherence to the UNGC standards is assessed by Swiss Life Asset Managers Luxembourg's ESG data provider MSCI (see above for details). Using the MSCI attribute on UNGC allows a broad coverage of assets within the portfolios. Further it enables Swiss Life Asset Managers Luxembourg to set clear investment limits restricting exposure in companies failing at least one of the ten UNGC principles. With regards to our private assets within Infrastructure Equity and Infrastructure Debt, we collect the information required to answer these two PAIs directly from our investee companies or borrowers as part of the PAI assessment. Furthermore, our ESG Assessment, conducted during investment due diligence and utilized in our annual portfolio monitoring, encompasses questions that address the principals of the UNGC.

Forward looking climate scenarios are not applied for the UNGC assessments, because this international standard primarily focuses on the social and governance dimensions of responsible investing.

- **Carbon Risk Real Estate Monitor (CRREM)**

The Carbon Risk Real Estate Monitor (CRREM) is the leading global initiative regarding target setting and additional resources aimed at enabling market participants to manage and reduce their operational carbon emissions for standing real estate investments. The initiative provides institutional real estate investors, managers, and other stakeholders globally, with a Paris-aligned direction to set and control ambitious 1.5-aligned decarbonization targets to stay in the downscaled “fair share” of the GHG budget for real estate in the use phase (operational emissions). CRREM has published decarbonization pathways that translate the ambitions of limiting global warming to 1.5°C by the end of the century, into SBTi (Science Based Target Initiative)-aligned, regionally and property-type-specific trajectories against which real estate assets and portfolios can be benchmarked. The pathways can be downloaded and used separately (see [www.crrem.org/pathways/](http://www.crrem.org/pathways/)). Also, these pathways are integrated into the CRREM-tool (see [www.crrem.eu/tool](http://www.crrem.eu/tool)). The resources provided is used to assess asset alignment in relation to 1.5-degree pathways (The Representative Concentration Pathway (RCP) is a GHG concentration trajectory adopted by the Intergovernmental Panel on Climate Change (IPCC). As a forward-looking scenario, RCP 4.5 designed in 2014 (IPCC, Fifth Assessment Report) is used and help the market to price risks associated with carbon emissions from buildings. The CRREM is in line with the TCFD (Task Force on Climate-Related Financial Disclosures) requirements. It is additionally aligned with the leading international accounting and reporting frameworks, disclosure guidelines and recommendations published by initiatives working within the field of decarbonization and real estate.

**Link to PAI indicator(s):**

Table 2, PAI 18 GHG emissions

**Methodology and data used to measure adherence or alignment:**

The use of the CRREM tool enables Swiss Life Asset Managers Luxembourg to insert property-specific energy consumption data to compare these with the scientifically based decarbonization pathways of CRREM. The CRREM tool thus is applied for all eligible real estate properties and allows for the assessment of these in relation to the above-mentioned PAIs. A detailed reference guide explains all steps of the application in various sections (see [www.crrem.eu/ tool/reference-guide/](http://www.crrem.eu/tool/reference-guide/)).

This information is used to assess asset alignment in relation to 1.5-degree pathways (GHG intensity derived by the representative concentration pathway [RCP] which is a GHG concentration trajectory adopted by the intergovernmental panel on climate change [IPCC]) and thereby helps Swiss Life Asset Managers Luxembourg to price risks associated with carbon emissions from buildings. This approach is used together with the suggested Scope 1, 2 and 3 allocation approach provided by the global real estate sustainability benchmark (GRESB Documents) which is also a partner of CRREM.

- **The Paris Agreement**

Under the auspices of the Net Zero Asset Managers initiative (NZAMi), Swiss Life Asset Managers Luxembourg has committed to decarbonize parts of its assets under management in line with the goal of limiting global warming to 1.5°C. Baseline and targets have been defined for in scope fixed income portfolios.

Link to PAI indicator(s):

Table 1, PAI 1 GHG emissions

Table 1, PAI 2 Carbon Footprint

**Methodology and data used to measure adherence or alignment:**

For committed fixed income portfolios, Scope 1, 2 and 3 emissions are covered with data from Swiss Life Asset Managers Luxembourg's ESG data provider MSCI, using industry and company-level estimates where companies do not disclose data. Swiss Life Asset Managers Luxembourg makes use of the Net Zero Asset Owner Alliance Target Setting Protocol and the Net Zero Investment Framework.

NZAOA TSP-endorsed scenarios were used for fixed income. These net zero pathways are aligned on the IPCC Special Report on Global Warming 1.5°C (no and low overshoot scenarios). For more details on Swiss Life Asset Managers Luxembourg's commitment, refer to the [signatory disclosure for NZAMi](#).

**Historical comparison**

PAI 1,2,8 and 9: Methodology update for infrastructure to calculate the annual PAIs as a sum of four quarters when quarterly data was available rather than the average of four quarters on asset level

PAI 2 - Methodology update to be more aligned with calculation used with the other PAIs: taking consideration of the eligible asset ratio in the calculation, leading to a more conservative Carbon Footprint figure.

PAI 6 – Methodology update for infrastructure considering only high climate impact sectors

PAI 11 -: Methodology update following a better understanding of the underlying data (Distinction between companies with 'No Evidence' and companies covered by our service provider, but without data for this specific PAI).

PAI 13 - Methodology update following new 'No-Adverse Impact' definition (for non-eligible investments considering gender equality of 50 as No Adverse Impact).

PAI 21: Methodology update following new 'No-Adverse Impact' definition (for non-eligible investments considering a Corruption Score of 100 as No Adverse Impact).

General: Recalculation of PAIs for the previous period due to increased data availability and due to a data revision based on being able to compare now data between periods.

## ANNEX 1

### **Zusammenfassung**

Swiss Life Asset Managers Luxembourg berücksichtigt die wichtigsten nachteiligen Auswirkungen ihrer Investitionsentscheidungen auf Nachhaltigkeitsfaktoren. Die vorliegende Erklärung ist eine konsolidierte Erklärung zu den wichtigsten nachteiligen Auswirkungen auf Nachhaltigkeitsfaktoren von Swiss Life Asset Managers Luxembourg.

Das Statement bezieht sich auf den Referenzzeitraum vom 1. Januar bis zum 31. Dezember 2023 und wird jährlich überprüft. Es deckt alle Vermögenswerte ab, die von den Fonds von Swiss Life Asset Managers Luxembourg gehalten werden. Die PAI werden auf alle Vermögenswerte gemessen, soweit dies möglich ist und Daten zur Verfügung stehen. Swiss Life Asset Managers Luxembourg führt Minderungsmaßnahmen und Kontrollen nur für Vermögenswerte von direkt verwalteten Fonds durch.

Swiss Life Asset Managers Luxembourg ist sich bewusst, dass ihre Investment-Management-Aktivitäten negative Auswirkungen auf Nachhaltigkeitsfaktoren haben können, und hat Verfahren definiert, um zu ermitteln, wie ihre Aktivitäten mit diesen negativen Auswirkungen verbunden sind und wie diese gemessen und gemildert werden können.

Swiss Life Asset Managers Luxembourg berücksichtigt die von der SFDR als obligatorisch eingestuften PAIs. Neben den von der SFDR als obligatorisch eingestuften PAI-Indikatoren hat Swiss Life Asset Managers Luxembourg die folgenden zusätzlichen PAI ausgewählt:

- Tabelle 2, PAI 18. Treibhausgasemissionen; und
- Tabelle 3, PAI 21 Durchschnittlicher Korruptionswert.

Aufgrund der Einhaltung verschiedener internationaler Initiativen und Verpflichtungen betrachtet Swiss Life Asset Managers Luxembourg die in Tabelle 1 und Tabelle 2 aufgeführten PAIs zu Treibhausgasemissionen als die wichtigsten PAIs des Referenzzeitraums.

Die Priorisierung von PAIs (und von PAIs abgeleiteten Leistungsindikatoren (KPIs)) und die damit verbundenen Messgrößen können je nach Anlageklasse variieren.

Der Ansatz von Swiss Life Asset Managers Luxembourg in Bezug auf die Berücksichtigung von PAI wird sich im Laufe der Zeit unter Berücksichtigung der regulatorischen Entwicklungen sowie der Best Practices der Branche weiterentwickeln.

Die Tätigkeit der Anlageberatung, für die Swiss Life Asset Managers Luxembourg zugelassen ist, wird nicht ausgeübt. Daher werden wesentliche nachteilige Auswirkungen von Investitionsentscheidungen auf Nachhaltigkeitsfaktoren in der Anlageberatung nicht berücksichtigt. Aus diesem Grund enthält der vorliegende Bericht keine Daten, die sich auf die Anlageberatung beziehen. Es ist nicht beabsichtigt, solche nachteiligen Auswirkungen zu berücksichtigen, solange Swiss Life Asset Managers Luxembourg keine solche Tätigkeit ausübt.

## **Résumé**

Swiss Life Asset Managers Luxembourg se penche sur les principales incidences négatives de ses décisions d'investissement sur les facteurs de durabilité. La présente déclaration résume l'état consolidé des principales incidences négatives sur les facteurs de durabilité de Swiss Life Asset Managers Luxembourg.

La présente déclaration concernant les principales incidences négatives sur les facteurs de durabilité couvre la période de référence allant du 1er janvier au 31 décembre 2023 et sera revu annuellement. Elle couvre tous les actifs détenus par les fonds de Swiss Life Asset Managers Luxembourg. Les PAI sont mesurés sur tous les actifs, dans la mesure du possible et lorsque les données sont disponibles. Swiss Life Asset Managers Luxembourg met en œuvre des mesures d'atténuation et des contrôles uniquement sur les actifs détenus directement par les fonds qu'il gère.

Swiss Life Asset Managers Luxembourg reconnaît que ses activités de gestion d'investissements peuvent avoir un impact négatif sur les facteurs de durabilité et a défini des procédures pour identifier comment ses activités sont liées à ces impacts négatifs et comment les mesurer et les atténuer.

Swiss Life Asset Managers Luxembourg considère les PAI identifiés comme obligatoires par la SFDR. Outre les indicateurs PAI identifiés comme obligatoires par la SFDR, Swiss Life Asset Managers Luxembourg a sélectionné les PAI supplémentaires suivants:

- Tableau 2, PAI 18. Émissions de gaz à effet de serre ; et
- Tableau 3, PAI 21 Score moyen de corruption.

En raison de son adhésion à diverses initiatives et engagements internationaux, Swiss Life Asset Managers Luxembourg considère les PAI sur les émissions de gaz à effet de serre figurant dans les tableaux 1 et 2 ci-dessous comme les principaux PAI de la période de référence.

La priorisation des PAI (et des indicateurs clés de performance (KPIs) dérivés des PAI), ainsi que les mesures correspondantes appliquées, peuvent varier d'une catégorie d'actifs à l'autre.

L'approche de Swiss Life Asset Managers Luxembourg concernant la prise en compte des PAI évoluera au fil du temps en tenant compte des développements réglementaires ainsi que des meilleures pratiques du secteur.

L'activité de conseil en investissement pour laquelle Swiss Life Asset Managers Luxembourg est agréée n'est pas exercée. Par conséquent, les principales incidences négatives des décisions d'investissement sur les facteurs de durabilité dans le cadre de conseils en investissement ne sont pas prises en compte. A cette fin, le présent rapport n'englobe pas de données relatives à des conseils en investissement. Il n'est pas envisagé de prendre en compte de telles incidences négatives tant que Swiss Life Asset Managers Luxembourg n'exercera pas cette activité.

**Sintesi**

Swiss Life Asset Managers Luxembourg tiene conto dei principali effetti negativi delle sue decisioni d'investimento sui fattori di sostenibilità. La presente è la dichiarazione consolidata sui principali effetti negativi sui fattori di sostenibilità di Swiss Life Asset Managers Luxembourg.

La dichiarazione copre il periodo di riferimento compreso tra il 1° gennaio e il 31 dicembre 2023 e sarà rivista su base annuale. Riguarda tutte le attività detenute dai fondi di Swiss Life Asset Managers Luxembourg. I PAIs sono misurati su tutte le attività, ove possibile e ove i dati sono disponibili. Swiss Life Asset Managers Luxembourg attua azioni di mitigazione e controlli solo sulle attività detenute direttamente dai fondi che gestisce.

Swiss Life Asset Managers Luxembourg riconosce che le sue attività di gestione degli investimenti possono generare impatti negativi sui fattori di sostenibilità e ha definito procedure per identificare come le sue attività siano collegate a questi impatti negativi, nonché come misurarli e mitigarli.

Swiss Life Asset Managers Luxembourg considera i PAI identificati come obbligatori dalla SFDR. Oltre agli indicatori PAI identificati come obbligatori dalla SFDR, Swiss Life Asset Managers Luxembourg ha selezionato i seguenti PAI aggiuntivi:

- Tabella 2, PAI 18. Emissione di gas serra; e
- Tabella 3, PAI 21 Punteggio medio relativo alla corruzione

In virtù dell'adesione a varie iniziative e impegni internazionali, Swiss Life Asset Managers Luxembourg considera i PAI sulle emissioni di gas a effetto serra, riportati nelle seguenti Tabella 1 e Tabella 2, come i principali PAI del periodo di riferimento.

La priorità dei PAIs (e dai KPI derivati dai PAIs) e le relative metriche applicate possono variare a seconda delle classi di attività. L'approccio di Swiss Life Asset Managers Luxembourg alla considerazione dei PAI si evolverà nel tempo tenendo conto degli sviluppi normativi e delle best practice del settore.

L'attività di consulenza in investimenti per la quale Swiss Life Asset Managers Luxembourg è autorizzata, non viene svolta. Pertanto, nella consulenza in investimenti non si tiene conto dei principali effetti negativi delle decisioni d'investimento sui fattori di sostenibilità. A tal fine, il presente reporting non include i dati relativi alla consulenza in investimenti. Non si intende tener conto di tali effetti negativi finché Swiss Life Asset Managers Luxembourg non svolgerà tale attività.