



Swiss Life 3a Employee Benefits Foundation
(Foundation)

Investment regulations

Entry into force: 1 October 2021

Art. 1 General

1 Basic principles

In conformity with Art. 9 of the foundation charter, the Board of Trustees of Swiss Life 3a Employee Benefits Foundation (Foundation) issues the following investment regulations.

2 Purpose

The investment regulations set out the investment principles, including the tasks and competencies relating to the Foundation's investment activity.

Art. 2 Investment of fund assets

1 Pension savings account (account solution)

The Foundation opens an account for each policyholder at a bank that is subject to supervision by the Swiss Financial Market Supervisory Authority (FINMA) (pension savings account). Deposits are credited to the pension savings account in accordance with Art. 4 of the Foundation's regulations. The interest paid on the account balance is based on Art. 5 of the Foundation's regulations.

2 Investments in securities (securities savings)

In accordance with Art. 6 of the Foundation's regulations, the policyholder can mandate the Foundation to invest all or part of the balance of his pension savings account in entitlements of selected investment groups of investment foundations pursuant to Art. 53g of the Federal Act on Occupational Old Age, Survivors' and Invalidity Pension Provision (OPA), or in collective investments with Swiss and foreign investment funds. The Foundation acquires the entitlements or fund units for the individual account of the policyholder.

The investment groups selected by the Board of Trustees and the collective investments for Swiss and foreign investment funds comply with the investment regulations under OPO 2 (Art. 49 OPO 2 et seq.). The principles of due care, security and diversification as per Art. 50, cl. 1-3 OPO 2 are particularly pertinent in this regard. The investment foundations and investment funds are responsible to the Board of Trustees for adhering to all legal provisions including provision of the requisite confirmations and submission of information as required for the Board to fulfil its legal supervisory function for the investment of the fund assets.

Investment opportunities may be extended in accordance with Art. 50, cl. 4 OPO 2. When making use of extended investment opportunities, the necessary conclusive documentation must be included in the notes to the financial statements.

Art. 3 Tasks and competencies

1 Board of Trustees

The Board of Trustees decides on the available investment strategies and their implementation. The Board of Trustees is authorised to change the investment strategies offered or the collective investments used to implement them at any time. In the event of a change of investment foundation, investment group or fund provider, it shall inform the policyholders in an appropriate manner. The policyholders shall be given a reasonable period of time in which to make a new investment decision. If no instructions are received after the deadline has expired, the entitlements or fund units shall be returned and the proceeds credited to the pension savings account.

2 Policyholders

The policyholders shall select an investment strategy within the framework of the opportunities offered by the Foundation on their own authority and based on their individual risk capacity and appetite.

The investment strategy must be selected in writing or in another form which enables proof to be provided by text. The policyholder is advised that they bear the investment risk in securities savings in accordance with Art. 2, cl. 2 and have no entitlement to either a minimum interest rate or capital preservation.

Art. 4 Governance

- 1** The collective investment providers selected by the Foundation (investment foundations and investment funds) and other persons and institutions entrusted with the management of the assets must have a good reputation and provide assurance of proper business conduct. They are subject to the fiduciary duty of care and must safeguard the interests of the policyholders in the course of their work.
- 2** Persons and institutions thus entrusted with the management of the assets must be capable and provide assurance that they shall adhere to the provisions of OPO 2 on loyalty in asset management.
- 3** External persons entrusted with the management of the assets or financial beneficiaries of companies entrusted with such tasks may not be represented on the Board of Trustees.
- 4** Contracts in connection with asset management must be terminable at the latest five years after conclusion with no adverse effect on the Foundation.
- 5** In the case of major legal transactions between the Foundation and related parties, offers must be obtained from competitors. The placing of contracts must be carried out with complete transparency.

- 6** Transactions for own account: Persons and institutions entrusted with asset management must act in the interests of the Foundation. In particular they may not:
- exploit knowledge of the Foundation's mandates in order to execute previously, in parallel or immediately afterwards corresponding transactions for their own account ("front running", "parallel running", "after running");
 - deal in a security or an investment where the Foundation deals in this security or investment and the Foundation might be disadvantaged; participation in such business in another form has the same status as trading;
 - reallocate the Foundation's custody accounts if this is not in the economic interest of the Foundation.

- 7** Surrender of financial gain: Persons and institutions entrusted with the Foundation's asset management must clearly record the type and method of compensation and its amount in a written agreement. They are obliged to hand over to the Foundation all financial gain which they additionally receive in connection with the exercise of their duties for the Foundation.

The guidelines on token gifts are defined in Appendix I.

8 Disclosure

- Persons and institutions entrusted with asset management must disclose their interest ties to the Board of Trustees on an annual basis. This also includes in particular beneficial ownership of companies which are in a business relationship with the Foundation. The Board of Trustees shall disclose this information to the statutory auditors.
 - Persons and institutions entrusted with asset management for the Foundation must supply a written declaration to the Board of Trustees every year confirming that they have surrendered all financial gain in accordance with Art. 48k OPO 2.
- 9** Only the following may be entrusted with the investment and management of the pension fund assets as external persons and institutions:
- Banks pursuant to the Federal Act of 8 November 1934 on Banks and Savings Banks
 - Investment foundations pursuant to Art. 53g OPA
 - Investment firms pursuant to Art. 41 of the Federal Act of 15 June 2018 on Financial Institutions (FinIA)
 - Fund management companies pursuant to Art. 32 FinIA and managers of collective assets pursuant to Art. 24 FinIA
 - Insurance companies pursuant to the Federal Act of 17 December 2004 on the Oversight of Insurance Companies
 - Financial intermediaries operating abroad that are subject to equivalent supervision by a recognised foreign supervisory authority.

10 Exercise of shareholder rights

As a rule, the Foundation only invests in collective investments (investment groups of investment foundations and investment funds). In the absence of directly held shares, no voting rights are exercisable.

Art. 5 Entry into force

By resolution of the Board of Trustees, these investment regulations enter into force on 1 October 2021. They can be modified by the Board of Trustees at any time in accordance with legal provisions and the foundation charter.

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Appendix I

Token gifts

Token gifts and customary occasional gifts are not subject to a disclosure obligation, but the following arrangements apply:

- 1** Token gifts and customary occasional gifts (including invitations) are deemed to comprise one-off gifts worth up to CHF 200 each and CHF 1000 per year and business partner, up to a maximum, however, of CHF 2500 per year. Token gifts and customary occasional gifts are permitted and do not have to be declared.
- 2** Occasional gift status is also given to invitations to an event in which the benefit to the Foundation is paramount, such as expert seminars, provided they do not take place more than once a month. Admissible events are generally limited to one day, do not apply to an accompanying person and can be reached by car or public transport. The event may be followed by a social event at lunchtime or in the evening.
- 3** Gifts and invitations which exceed the limits per case or year under clauses 1 and 2 may be admissible if approved by the Board of Trustees. They must be declared.
- 4** Financial gains in the form of cash benefits (vouchers, compensation) as well as kick-backs, retrocessions and similar payments which are not based on a written agreement with the Board of Trustees, plus private invitations with no apparent business purpose (e.g. to concerts, exhibitions etc.) are to be handed over to the Foundation.
- 5** If financial gains are falsely retained, the Foundation is obliged to reclaim these monetary assets immediately and is authorised to impose sanctions which in each individual case may go as far as termination of the employment relationship or cancellation of the mandate together with legal action for misappropriation of funds.

Appendix II

“Swiss Life 3a Start” investment strategies

The policyholder may select the following investment strategies and/or investment groups of the Swiss Life Investment Foundation as part of the “Swiss Life 3a Start” product, taking into account their individual risk capacity and appetite.

Name	ISIN
BVG-Mix 15	CH0015649657
BVG-Mix 25	CH0012456015
BVG-Mix 35	CH0012456064
BVG-Mix 45	CH0012456072
BVG-Mix 75	CH0435830028
BVG-Mix 25 P	CH0014369042
BVG-Mix 35 P	CH0014369166
BVG-Mix 45 P	CH0014369257

This list may be amended by the Board of Trustees at any time.

The investment groups selected by the Board of Trustees comply with the investment regulations pursuant to OPO 2 (Art. 49 OPO 2 et seq.). The principles of due care, security and diversification as per Art. 50, cl. 1-3 OPO 2 are particularly pertinent in this regard. The investment foundations are responsible to the Board of Trustees for adhering to all legal provisions including provision of the requisite confirmations and submission of information as required for the Board to fulfil its legal supervisory function for the investment of the fund assets.

Appendix III

“Pando 3a” investment strategies

With the “Pando 3a” product, the policyholder can choose between five different risk and investment profiles, taking into account their individual risk capacity and appetite. With regard to the strategic equity weighting, these differ as follows:

- 20% strategic equity weighting
- 40% strategic equity weighting
- 60% strategic equity weighting
- 80% strategic equity weighting
- 100% strategic equity weighting

In addition, the policyholder can select one or more of the following three investment themes (impact themes):

- Climate Action
- Environment & Biodiversity
- Green Buildings & Infrastructure

The selected risk and investment profile is implemented through a basic portfolio (core funds) consisting of two equity funds (Equity Global ESG and Equity Switzerland ESG) and three bond funds (Global Government Bonds, Emerging Markets Government Bonds ESG, Global Corporate Bonds ESG). The basic portfolio is supplemented by one or more impact theme funds reflecting the investment themes (impact themes) selected by the policyholder.

The option of combining five possible risk/investment profiles with the option of selecting one to three impact themes results in 35 different investment strategies, which are listed below:

Name	Impact theme
Strategic equity weighting 20%	
Willow 20	Climate
Pine 20	Environment & Biodiversity
Oak 20	Green Buildings & Infrastructure
Juniper 20	Climate, Environment & Biodiversity
Maple 20	Climate, Green Buildings & Infrastructure
Ginkgo 20	Environment & Biodiversity, Green Buildings & Infrastructure
Redwood 20	Climate, Environment & Biodiversity, Green Buildings & Infrastructure

Name	Impact theme
Strategic equity weighting 40%	
Willow 40	Climate
Pine 40	Environment & Biodiversity
Oak 40	Green Buildings & Infrastructure
Juniper 40	Climate, Environment & Biodiversity
Maple 40	Climate, Green Buildings & Infrastructure
Ginkgo 40	Environment & Biodiversity, Green Buildings & Infrastructure
Redwood 40	Climate, Environment & Biodiversity, Green Buildings & Infrastructure
Strategic equity weighting 60%	
Willow 60	Climate
Pine 60	Environment & Biodiversity
Oak 60	Green Buildings & Infrastructure
Juniper 60	Climate, Environment & Biodiversity
Maple 60	Climate, Green Buildings & Infrastructure
Ginkgo 60	Environment & Biodiversity, Green Buildings & Infrastructure
Redwood 60	Climate, Environment & Biodiversity, Green Buildings & Infrastructure
Strategic equity weighting 80%	
Willow 80	Climate
Pine 80	Environment & Biodiversity
Oak 80	Green Buildings & Infrastructure
Juniper 80	Climate, Environment & Biodiversity
Maple 80	Climate, Green Buildings & Infrastructure
Ginkgo 80	Environment & Biodiversity, Green Buildings & Infrastructure
Redwood 80	Climate, Environment & Biodiversity, Green Buildings & Infrastructure
Strategic equity weighting 100%	
Willow 100	Climate
Pine 100	Environment & Biodiversity
Oak 100	Green Buildings & Infrastructure
Juniper 100	Climate, Environment & Biodiversity
Maple 100	Climate, Green Buildings & Infrastructure
Ginkgo 100	Environment & Biodiversity, Green Buildings & Infrastructure
Redwood 100	Climate, Environment & Biodiversity, Green Buildings & Infrastructure

Each investment strategy is tracked by a model portfolio following a core-satellite approach. The core of the investment portfolio is the basic portfolio, which consists of equity and bond funds (core funds). The impact theme funds selected by the policyholder are satellites.

The allocations of the model portfolios are determined by the asset manager as follows:

- The strategic equity weighting relative to fixed income is determined by the investment profile.
- The number of impact themes selected by the policyholder determines the weight of the impact satellites within the equity portfolio. The more themes are selected, the greater the weight of the impact satellites.
- The composition of the model portfolios within fixed income is determined by the asset manager.
- The composition of the model portfolios within the equity component is determined by the asset manager.

The asset manager may adjust the composition of the model portfolios to market conditions at its discretion. The investment themes (impact themes) selected by the policyholder and the strategic equity weighting may not be changed.

The percentage share of equity funds may change over time and deviate from the model portfolio in line with the varying performance of the investment funds contained in the policyholder's portfolios. The deviation of the policyholder's portfolios from their strategic equity weighting may not exceed 10%.

The weighting of the impact satellites within the equity portfolio is shown in the following overview:

Strategic equity weighting 20%			
Number of impact themes	1	2	3
Impact theme 1	4.00%	2.50%	2.00%
Impact theme 2		2.50%	2.00%
Impact theme 3			2.00%
Strategic equity weighting 40%			
Number of impact themes	1	2	3
Impact theme 1	8.00%	5.00%	4.00%
Impact theme 2		5.00%	4.00%
Impact theme 3			4.00%
Strategic equity weighting 60%			
Number of impact themes	1	2	3
Impact theme 1	12.00%	7.50%	6.00%
Impact theme 2		7.50%	6.00%
Impact theme 3			6.00%
Strategic equity weighting 80%			
Number of impact themes	1	2	3
Impact theme 1	16.00%	10.00%	8.00%
Impact theme 2		10.00%	8.00%
Impact theme 3			8.00%

Strategic equity weighting 100%			
Number of impact themes	1	2	3
Impact theme 1	20.00%	12.50%	10.00%
Impact theme 2		12.50%	10.00%
Impact theme 3			10.00%

The investment strategies are implemented by means of the following collective investments:

Market	Fund	ISIN	Currency
Bonds Global Government	Swiss Life iFunds (CH) Obligationen Globale Staaten+	CH0023989624	CHF
Bonds EM Government ESG	Swiss Life Funds (Lux) Bond ESG EM Sovereigns	LU2349915582	CHF
Bonds Global Corporates ESG	Swiss Life Funds (Lux) Bond ESG Global Corporates	LU2349915749	CHF
Equity Switzerland	UBS ETF (CH) SPI ESG	CH0590186661	CHF
Equity Global - Core	Swiss Life Funds (Lux) Equity ESG Global	LU2349915822	CHF
Equity Impact Fund - Climate Action	Swiss Life Funds (Lux) Equity Climate Impact	LU2349916986	CHF
Equity Impact Fund - Environment & Biodiversity	Swiss Life Funds (Lux) Equity Environment & Biodiversity Impact	LU2349917950	CHF
Equity Impact Fund - Green Buildings & Infrastructure	Swiss Life Funds (Lux) Equity Green Buildings & Infrastructure Impact	LU2351077594	CHF

The Board of Trustees decides on changes to the collective investments used to implement the investment strategies. Such changes must be brought to the attention of the policyholders affected in an appropriate form.