# PRE-CONTRACTUAL INFORMATION ON SUSTAINABILITY

PRE-CONTRACTUAL INFORMATION ON SUSTAINABILITY (FINANCIAL PRODUCTS REFERRED TO IN ARTICLE 8(1), (2) AND (2A) OF REGULATION (EU) 2019/2088 AND THE FIRST PARAGRAPH OF ARTICLE 6 OF REGULATION (EU) 2020/852)





The insurer for a changing world

### Sustainable investment is

defined as an investment in an economic activity that contributes to an environmental or social objective, provided that it does not cause significant harm to either of these objectives and that the companies benefiting from the investment apply good **governance practices**.

The EU taxonomy is a classification system established by Regulation (EU) 2020 /852, which lists environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic acti-

vities. Sustainable investments with an environmental objective are not necessarily aligned with the taxonomy. Product name: General Fund Legal entity identifier: 213800I92TAU7I3FP232 Document updated in June 2024

### **ENVIRONMENTAL AND/OR SOCIAL CHARACTERISTICS**

Does this financial product have a sustainable investment objective?

• • 🗙 No

### • • 🗌 Yes

It will make a minimum of sustainable investments with an environmental objective.....%

- In economic activities that are considered environmentally sustainable under the EU taxonomy
- In economic activities that are not considered environmentally sustainable under the EU taxonomy
- It will make a minimum of sustainable investments with a social objective .....%

### ☑ It promotes environmental and social (E/S) characteristics and, although it does not have sustainable investment as its objective, it will contain a minimum proportion

- of 9% sustainable investments With an environmental objective and carried out in economic activities that are considered environmentally sustainable under the EU taxonomy
- With an environmental objective and carried out in economic activities that are not considered environmentally sustainable under the EU taxonomy

 With a social objective
It promotes E/S features, but will not will not make sustainable investments.



# WHAT ENVIRONMENTAL AND/OR SOCIAL CHARACTERISTICS DOES THIS FINANCIAL PRODUCT PROMOTE?

This financial product meets the definition of Article 8 of European Regulation (EU) 2019/2088 known as the SFDR, i.e. it promotes a combination of environmental and social characteristics, while respecting good governance practices.

This financial product excludes countries and companies with the lowest ESG (Environment, Social and Governance) ratings, and aims to improve the environmental and social performance of its property portfolio. The investments made by the Cardif Lux Vie General Fund also promote positive-impact investments that are intended to generate a measurable social, societal and/or environment al impact.

To strengthen its commitment to the fight against global warming, Cardif Lux Vie, through BNP Paribas Cardif, joined the Net-Zero Asset Owner Alliance (NZAOA) in 2021<sup>1</sup>, a UN-backed initiative bringing together international insurers and pension funds, and has committed to aligning its investment portfolio on a carbon-neutral trajectory by 2050. This commitment is built into the management of this financial product.

No benchmark has been designated to achieve the environmental or social characteristics promoted by the financial product.

<sup>1 -</sup> by 2050. This commitment is built into the management of this financial product.

### Sustainability indicators

measure the way in which the environmental or social characteristics promoted by the product are achieved.

### What sustainability indicators are used to measure the achievement of each of the environmental or social characteristics promoted by the financial product?

The achievement of each of the environmental or social characteristics promoted by the financial product can be measured using four indicators:

- 1. **Country selection based on ESG criteria:** this financial product excludes countries that perform poorly on these issues, through the application of the BNP Paribas Group's country policies, supplemented by an analysis of the ESG performance of the countries concerned. This filter applies to securities issued directly by countries (government bonds) and securities issued by companies (equities and corporate bonds) whose head offices are located in the excluded countries.
- Selection of companies based on ESG criteria: This financial product uses a sector-based best-in-class approach. This ESG filter makes it possible to exclude the worst-performing companies within each business sector. The application of sectoral policies provides a framework for investment in sensitive areas (tobacco, thermal coal, oil and gas, etc.).
- The carbon footprint (scope 1 et 2)<sup>2</sup> of shares and corporate bonds held directly (tCO2e/M€ invested): this financial product is committed to phasing out thermal coal by 2030 for European Union and OECD countries and by 2040 for the rest of the world.
- 4. **Positive-impact investments:** This financial product accounts for most of the positive-impact investments made by Cardif Lux Vie, averaging €80 million a year between 2020 and 2025. These investments include sustainable bonds, renewable energy infrastructure and retirement homes.

The financial product tracks other sustainability indicators for its asset classes, such as indicators of the main negative sustainability impacts.

# What are the sustainable investment objectives that the financial product intends to pursue and how do the investments made contribute to these objectives?

This financial product invests a minimum of 9% of its assets in sustainable investments. These are defined by Cardif Lux Vie for each asset class; some examples are:

- green bonds financing projects with environmental objectives: mitigating climate change, adapting to climate change, preserving natural resources, preserving biodiversity, preventing and controlling pollution;
- corporate bonds, or SDG Bonds, which finance projects that contribute to the United Nations' Sustainable Development Goals\* (SDG);
- environmental funds: energy transition, energy efficiency, sustainable food and agriculture, climate change mitigation, waste management;
- funds with social themes: well-being in the workplace, job creation, inclusion, etc;
- funds with social themes: education, sustainable mobility solutions, customer satisfaction, social and solidarity economy;
- property assets whose environmental performance has been certified or labelled, and/or which have a social or societal dimension

These investments contribute to the environmental and social objectives promoted by the financial product.

<sup>2-</sup> Scope 1: Direct greenhouse gas emissions (from the company's fixed or mobile installations). Scope 2: associated indirect emissions (consumption of electricity, cooling and heating)

The main negative impacts are the most significant negative impacts of investment decisions on sustainability factors related to environmental, social and labour issues, respect for human rights and the fight against corruption and bribery.

### To what extent do the sustainable investments that the financial product intends to pursue not cause significant harm to an environmentally or socially sustainable investment objective?

The sustainable investments in this financial product follow Cardif Lux Vie's responsible investment strategy, which takes into account the main negative impacts.

The methodology for qualifying sustainable investments - as set out above - makes it possible to limit damage to sustainability objectives in environmental or social terms.

### How were the indicators for adverse impacts on sustainability factors taken into account?

The main negative impacts are taken into account through the introduction of exclusions applicable to all companies and countries invested in. An additional governance filter is applied to companies in order to qualify as a sustainable investment.

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### To what extent do sustainable investments comply with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Detailed description:

This financial product applies a specific filter to companies, based on external ratings that assess how well they integrate the four pillars of the United Nations Global Compact: respect for international labour standards, human rights, the environment and the fight against corruption. Companies excluded by this specific filter are therefore excluded from the investment universe.

The EU Taxonomy establishes a "do no significant harm" principle whereby investments aligned to the Taxonomy should not cause significant harm to the objectives of the EU Taxonomy and is accompanied by specific EU criteria.

The principle of "not causing significant harm" applies only to investments underlying the financial product that take into account the European Union's criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the European Union's criteria for environmentally sustainable economic activities.

Any other sustainable investment must also not cause significant harm to environmental or social objectives.

The investment strategy

guides investment decisions based on factors such as investment objectives and risk tolerance.



### DOES THIS FINANCIAL PRODUCT TAKE INTO ACCOUNT THE MAIN NEGATIVE IMPACTS ON SUSTAINABILITY FACTORS? X YES NO

Cardif Lux Vie's risk management takes into account the main negative impacts on the financial product's investments. Indicators relating to these negative impacts are taken into consideration through three levers:

■ sectoral policies,

- an ESG analysis and integration process,
- a shareholder engagement policy.

These levers are detailed in Cardif Lux Vie's statement on the main negative impacts on sustainability.<sup>3</sup> Cardif Lux Vie regularly improves each of these levers in line with best market practices, new issues to be taken into account and available information.



### WHAT INVESTMENT STRATEGY DOES THIS FINANCIAL PRODUCT FOLLOW?

This financial product takes ESG criteria into account when analysing the assets in which it invests. This analysis can be qualitative and/or quantitative. Cardif Lux Vie's responsible investor approach is structured in different stages. Cardif Lux Vie collects ESG data specific to each asset class, which is then analysed and integrated into the investment process.

1) The selection and investment processes are adapted as follows:

### ■ INVESTMENTS IN SOVEREIGN AND SUPRANATIONAL BONDS:

Cardif Lux Vie analyses the ESG performance of countries in order to exclude the worst performing countries from the investment universe.

### ■ INVESTMENTS IN COMPANIES:

In addition to the country exclusions to which companies are subject, the responsible investment process for securities held directly by Cardif Lux Vie follows the following steps:

- A filter is applied to compliance with international standards and treaties. The country where the company has its head office must not be under embargo or subject to international financial sanctions;
- Sectoral exclusions are applied;
- A "Best in class" ESG filter is applied to exclude companies whose ESG score is in the bottom 3 deciles of their sector;
- A carbon transition filter completes the ESG process.

### ■ INVESTMENTS IN PROPERTY ASSETS:

Direct investment in property assets consists of the acquisition, management and disposal of property assets held by this financial product. The following practices are deployed to meet environmental challenges:

- For directly managed assets, systematic certification/labelling of building s under construction (Breeam Excellent, etc.). Cardif Lux Vie also encourages building methods that generate less CO2 emissions. Wherever possible, buildings in the renovation and operational phases are certified. With regard to management and works, the aim is always to improve environment al performance.
- An analysis of changes in the energy consumption of directly managed tertiary buildings and their carbon intensity is carried out each year as part of the mapping of the energy performance of Cardif Lux Vie's property portfolio. Cardif Lux Vie also pays particular attention to the social benefits of housing by helping to increase the number of retirement homes available.

3 - https://www.cardifluxvie.com/fr/notre-responsabilite

### ■ INVESTMENTS IN EXTERNAL FUNDS:

- For listed funds (equity funds, bond funds), Cardif Lux Vie carries out an ESG analysis of the management company and the fund, in particular through due diligence questionnaires that measure the level of integration of ESG criteria by the fund via an internal rating.
- For unlisted funds (private equity funds, private debt funds, infrastructure funds), management companies are questioned about their process for integrating ESG criteria: firstly, at the level of the management company and its governance, then at the level of the companies financed by the fund. This due diligence enables us to establish an internal ESG rating that will be taken into account when validating the investment.

#### 2) Commitment through voting and dialogue:

Cardif Lux Vie exercises its voting rights<sup>4</sup> at the general meetings of the companies in which it is a shareholder, throughout the period of ownership of the companies invested, thereby contributing to the proper orientation of corporate governance.

In addition, in order to strengthen its efforts to combat global warming, BNP Paribas Cardif (parent company of Cardif Lux Vie) joined the Climate Action 100+ initiative in 2021. Its signatories work together to encourage the world's largest emitters of greenhouse gases to take the necessary steps to combat global warming.

In addition, when investing in external funds, Cardif Lux Vie dialogues with fund management companies to encourage them to integrate non-financial issues into their management processes. Our engagement with these companies is based on a specific questionnaire sent to management companies on their ESG practices, which enables us to map and engage in a dialogue on their sector exclusion practices and their level of integration of ESG criteria.

Cardif Lux Vie has also set up a system to manage any controversies to which the companies it invests may be exposed. This system combines control functions and makes it possible to take freeze or divestment decisions depending on the criticality of the controversy.

<sup>4 -</sup> Voting report available on this page: https://www.cardifluxvie.com/fr/notre-responsabilite

# What are the constraints defined in the investment strategy used to select investments in order to achieve each of the environmental or social characteristics promoted by this financial product?

The responsible investment process for securities held directly by this financial product includes the following exclusion filters:

#### 1. Country exclusions:

Through the application of BNP Paribas Group country policies, a filter is applied to compliance with international standards and treaties (embargoes and international financial sanctions).

Cardif Lux Vie also applies an ESG filter to securities issued by countries (government bonds) and securities issued by companies operating in those countries (equities and corporate bonds). Only countries with a satisfactory ESG rating are retained in the investment universe:

- The Environment takes into account the country's energy mix, carbon footprint and ratification of treaties, notably the Paris Agreement. The analysis also reflects indicators on greenhouse gas emissions, such as CO2 emissions in relation to gross domestic product.
- The Social aspect measures government policies on poverty, access to employment and access to electricity, as well as ratification of treaties on labour rights and children's rights.
- Governance includes respect for human rights and labour rights.

### 2. Company exclusions:

2.1 Sectoral exclusions

These exclusions are based on the BNP Paribas Group's sectoral policies and cover investments in sectors with environmental or social issues. These policies, which are available online at the BNP Paribas website<sup>5</sup>, are regularly extended or revised: Defence, Palm oil, Pulp, Nuclear energy, Thermal coal, Agriculture, Mining, Oil and gas.

Cardif Lux Vie has also made specific commitments regarding the tobacco and thermal coal sectors:

- Exclusion of manufacturers, wholesalers and distributors whose sales derive more than 10% from tobacco.
- Implementation of a timetable for phasing out thermal coal across the entire value chain (developers, mining companies, logistics and electricity producers) in addition to BNP Paribas' commitment to phasing out thermal coal by 2030 at the latest for European Union and OECD countries and by 2040 at the latest for the rest of the world.
- 2.2 Best-in-Class ESG approach The "best-in-class" ESG approach favours the best practices of companies within the same sector for securities held directly. Within each sector, companies with ESG ratings in the bottom three deciles (30%) are excluded.
- 2.3 Carbon transition filter

This filter is used to identify companies that are committed to the transition to a low-carbon economy. Companies that emit more than 1 million tonnes of CO2 equivalent and whose energy transition strategy is considered weak (Moody's ESG rating below 30) are excluded from the investment universe.

5 - https://www.cardifluxvie.com/fr/notre-responsabilite

**Good governance** practices relate to sound management structures, employee relations, staff remuneration and compliance with tax obligations.

Asset allocation describes the proportion of investments in specific assets.

### What is the minimum proportion by which the financial product undertakes to reduce its investment scope before applying this investment strategy?

To date, this financial product has not set itself a minimum proportion for reducing the investment scope before applying the investment strategy.

# What is the policy implemented to assess the good governance practices of the companies in which the financial product invests?

This financial product applies a specific filter at company level, based on external ratings assessing the extent to which the four pillars of the United Nations Global Compact have been properly integrated. The good governance practices of the companies we invest in are assessed through an ESG rating, which includes a Governance pillar that takes into account a number of criteria, including corruption, remuneration policy and internal controls.

In addition, for the companies in which it is a shareholder, Cardif Lux Vie exercises its voting rights<sup>6</sup> at general meetings, thereby contributing to good corporate governance.





Category **#1 Aligned with E/S characteristics** includes financial product investments used to achieve the environmental or social characteristics promoted by the financial product.

Category **#2 Other** includes the remaining investments in the financial product that are neither aligned with environmental or social characteristics nor considered to be sustainable investments.

Category #1 Aligned with E/S characteristics includes:

Sub-category **#1A Sustainable** covering sustainable investments with environmental or social objectives; Sub-category **#1B Other E/S characteristics** covering investments aligned with environmental or social characteristics that are not considered sustainable investments.

\* This minimum share is expressed as a percentage of the total investments in the financial product.

# How can the use of derivatives help to achieve the environmental or social characteristics promoted by the financial product?

Derivatives are used to minimise or offset the risk of loss of value of investments. Derivatives are not intended to contribute to achieving the environmental or social characteristics promoted by the financial product.

6 - Cardif Lux Vie voting report available on this page: https://www.cardifluxvie.com/fr/notre-responsabilite

Activities aligned with the taxonomy are expressed as a percentage:

- of sales to reflect the proportion of revenue from the green activities of the companies in which the financial product invests;
- of capital expenditure (CapEx) to show the green investments made by the companies in which the financial product invests, for a transition to a green economy, for example;
- of operating expenses (OpEx) to reflect the green operational activities of the companies in which the financial product invests.

**Enabling activities** directly enable other activities to make a substantial contribution to achieving an environmental objective.



### TO WHAT MINIMUM EXTENT ARE SUSTAINABLE INVESTMENTS WITH AN ENVIRONMENTAL OBJECTIVE ALIGNED WITH THE EU TAXONOMY?

Certain sustainable investments in the financial product are aligned with the European Union Taxonomy. However, this financial product does not currently have a minimum target for sustainable investments in activities aligned with the European Union's taxonomy.

# Does this financial product invest in fossil gas and/or nuclear energy activities that comply with the EU Taxonomy?

□ Yes: □ In fossil gas □ In nuclear energy ⊠ No

The two graphs below show in green the minimum percentage of investments aligned with the EU Taxonomy. As there is no appropriate methodology for determining the alignment of sovereign bonds\* with the Taxonomy, the first graph shows the alignment with the Taxonomy in relation to all investments in the financial product, including sovereign bonds, while the second graph shows the alignment with the Taxonomy only in relation to investments in the financial product other than sovereign bond

100%

100%

### 1. Investments aligned with the Taxonomy including sovereign bonds\*

- Aligned with Taxonomy: Fossil gas
- Aligned with Taxonomy: Nuclear energy
- Aligned with Taxonomy: (excluding fossil gas and nuclear)
- Not aligned with the Taxonomy

# 2. Investments aligned with the Taxonomy and excluding sovereign bonds\*

- Aligned with Taxonomy: Fossil gas
- Aligned with Taxonomy: Nuclear energy
- Aligned with Taxonomy: (excluding fossil gas and nuclear)
- Not aligned with the Taxonomy

\*For the purposes of these charts, "sovereign bonds" include all sovereign exposures.

<sup>7 -</sup> Fossil gases and/or nuclear-related activities only comply with the EU taxonomy when they contribute to limiting climate change ("climate change mitigation") and do not significantly undermine the objective of the EU taxonomy. The full criteria for economic activities relating to fossil gases and nuclear energy in line with the EU taxonomy are set out in Commission Delegated Regulation (EU) 2022/1214.

### Transitional activities are

activities for which lowcarbon alternatives do not yet exist and, among other things, whose greenhouse gas emission levels correspond to the best achievable performance.



The symbol represents sustainable investments with an environmental. objective that do **not take** into account the criteria applicable to environmentally sustainable economic activities under the EU taxonomy.

### What is the minimum proportion of investment in transitional and enabling activities?

This financial product does not currently have a minimum share of sustainable investments in transitional and enabling activities. The investment strategy does, however, allow for investment in such activity.



### TO WHAT MINIMUM EXTENT ARE SUSTAINABLE INVESTMENTS WITH AN ENVIRONMENTAL OBJECTIVE ALIGNED WITH THE EU **TAXONOMY?**

This financial product does not currently have a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy. The investment strategy does, however, allow for investment in such activity.



### WHAT IS THE MINIMUM PROPORTION OF SOCIALLY SUSTAINABLE **INVESTMENT?**

This financial product does not currently have a minimum share of socially sustainable investments. The investment strategy does, however, allow for investment in such activity.



### WHAT INVESTMENTS ARE INCLUDED IN CATEGORY "#2 OTHER". WHAT IS THEIR PURPOSE AND DO MINIMUM ENVIRONMENTAL OR SOCIAL GUARANTEES APPLY TO THEM?

The financial product investments in category #2 Other include derivatives, cash and certain assets which, after analysis, are not aligned with the Environmental/Social characteristics. Minimum environmental or social guarantees apply on a case-bycase basis depending on the asset class and the non-financial data available.



### WHERE CAN I FIND MORE SPECIFIC INFORMATION ABOUT THE FINANCIAL PRODUCT ONLINE?

Further information on the financial product is available on the website: https:// www.cardifluxvie.com/fr/notre-responsabilite





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