

# CARDIF LUX VIE'S SUSTAINABILITY-RELATED TRANSPARENCY COMMITMENTS

(ARTICLE 3 OF THE SFDR)



**CARDIF LUX VIE**  
BNP PARIBAS GROUP

The insurer  
for a changing  
world

In compliance with Regulation (EU) 2019/2088, the Sustainable Finance Disclosure Regulation (SFDR) which introduces new sustainability-related disclosure obligations, Cardif Lux Vie publishes the following information:

## **1. POLICIES ON THE SUSTAINABILITY RISKS IN THE INVESTMENT DECISION-MAKING PROCESS (ARTICLE 3 OF THE SFDR)**

Cardif Lux Vie's investment decision-making process can be analysed in two parts:

### **1.1. INVESTMENTS MADE IN THE GENERAL FUND**

Cardif Lux Vie takes account of Environmental, Social and Governance (ESG) criteria when analysing its investments. Cardif Lux Vie's responsible investment policy applies to the different asset classes in the portfolio. The methodologies applied are adapted, and the specific characteristics of each asset class are taken into account.

Cardif Lux Vie applies the exclusions defined by the BNP Paribas Group based on its sectorial policies. The BNP Paribas Group's sectorial policies govern investments in sectors that facing significant environmental challenges, such as mining, oil and gas, and coal-fired power generation.

In addition to the restrictions set out in these policies, Cardif Lux Vie has made specific commitments regarding business sectors that are particularly harmful to public health and the environment.

**Cardif Lux Vie's responsible investment approach is structured around:**

- **ESG analysis:** Cardif Lux Vie collects non-financial data, analyses it and integrates it into its management processes.
- **ESG integration level:** for the assets analysed, Cardif Lux Vie rates the level of consideration given to ESG issues based on their non-financial strategy, their process for integrating ESG criteria, their compliance with international conventions or treaties, and their labels and certifications.

These non-financial criteria form an integral part of fundamental financial analysis and contribute to better identification of sustainability risks. The contribution to returns will be seen in the long-term resilience of its investments in the face of sustainability risks.

### **1.2. INVESTMENTS MADE IN THE FORM OF UNIT-LINKED PRODUCTS (EXTERNAL FUNDS) / INTERNAL FUNDS**

Cardif Lux Vie sells life insurance and capitalisation policies through various partner networks (banks, brokers and wealth management advisors) responsible for offering the most suitable financial solution to their clients, particularly in terms of risk profile, investment horizon and sustainability preferences.

The distributor offers products that match the client's sustainability preferences from a wide range of funds labelled or considered sustainable under SFDR regulations.

## **2. REMUNERATION POLICIES IN RELATION TO THE INTEGRATION OF SUSTAINABILITY RISKS (ARTICLE 5 OF THE SFDR)**

Cardif Lux Vie's social commitment involves promoting sustainable investments while ensuring that sustainability risks, i.e. environmental, social and governance risks, are limited.

To promote the involvement of its employees in these issues, Cardif Lux Vie integrates sustainability risks into its remuneration policy.

Cardif Lux Vie's principles of remuneration require that financial market operators' variable remuneration does not encourage excessive risk-taking in relation to the sustainability of investments and financial products governed by the European SFDR Regulation.

1- The SFDR is available in all EU languages on the official EU website: [link to Regulation \(EU\) 2019/2088](#)  
 2- <https://group.bnpparibas/decouvrez-le-groupe/notre-gouvernance/positions-groupe-et-politiques-sectorielles>

The remuneration policy aims to promote professional conduct in line with the standards set out in the BNP Paribas Group Code of Conduct.

This Code presents the rules and requirements of BNP Paribas for upholding its aspirations to contribute to a responsible and sustainable worldwide development.

**These aspirations are based on three pillars:**

1. promoting respect for human rights,
2. protecting the environment and fighting climate change, and
3. acting responsibly in public representation.

Within Cardif Lux Vie, the variable portion of employees' individual remuneration takes account of compliance with the BNP Paribas Group's Code of Conduct, along with other criteria.

### **3. INFORMATION IN ACCORDANCE WITH THE SFDR REGULATIONS RELATING TO FINANCIAL PRODUCTS OFFERED IN POLICIES MARKETING BY CARDIF LUX VIE (ARTICLE 10 SFDR)**

Information concerning the investment vehicles offered within life insurance and capitalisation policies available on the website at [www.cardifluxvie.lu/document-information/#/details](http://www.cardifluxvie.lu/document-information/#/details)

For each article 8 or article 9 product within the meaning of the SFDR regulations, the links allow you to access:

- a description of the environmental or social characteristics or the sustainable investment objective;
- a description of the methods used to assess, measure and monitor the environmental and/or social characteristics and the impact of the investments selected for the financial product. This includes data sources, criteria for evaluating underlying assets and non-financial indicators used.
- information to be provided during the pre-contractual phase;
- the information provided in periodic reports.

### **4. CARDIF LIFE INSURANCE'S RANGE OF POLICIES AND INVESTMENT PRODUCTS THAT PROMOTE ENVIRONMENTAL OR SOCIAL CHARACTERISTICS (ARTICLE 8 SFDR) AND PRODUCTS THAT HAVE SUSTAINABLE INVESTMENT OBJECTIVES (ARTICLE 9 SFDR)**

The list of unit-linked products declared under Article 8 or 9 of the SFDR disclosed by BNP Paribas Cardif is available on the "Our Responsibility" page of the Cardif Lux Vie website <https://cardifluxvie.com/cardif-lux-vie/notre-reponsabilite/>

And via the link: <https://www.cardifluxvie.lu/document-information>

ALL NETWORKS	BGL BNP PARIBAS NETWORK	LUXEMBOURG BROKERS NETWORK
Cap Secure Belgique	Optilib	My Pension +
Cap Secure France	Optilife2	My Prolife
Cap Secure Luxembourg	Optipension +	
Cardif Private Insurance Italia	Optisave +	
Euro Oportunidad Vida		
Liberty 2 Invest Belgique		
Liberty 2 Invest France		
Liberty 2 Invest International		
Liberty 2 Invest Luxembourg		
Liberty 2 Invest Portugal		

**GLOSSARY:**

**ESG criteria (source: Novethic):** This international abbreviation is used by the financial community to refer to the Environmental, Social and Governance (ESG) criteria that generally constitute the three pillars of non-financial analysis.

These criteria are incorporated into socially responsible management. The ESG criteria can be used to evaluate companies' exercising of their responsibility vis-à-vis the environment and their stakeholders (employees, business partners, sub-contractors and clients):

- The environmental criterion takes account of: waste management, the reduction of greenhouse gas emissions and the prevention of environmental risks;
- The social criterion takes account of: the prevention of accidents, training of personnel, respect for employees' rights, the supply chain and social dialogue;
- The governance criterion verifies: the independence of the board of directors, the management structure and the presence of an audit committee.

**General Fund:** This fund is an investment option for life insurance policies, traditionally composed of bonds, equities and real estate assets. The insurer's commitments are represented by a value expressed in euros.

**External funds/Unit-linked products:** Just like the General Funds, unit-linked products are used as the basis of life insurance products. The insurer's commitment in the case of unit-linked products is expressed as a number of units, the value of which is determined by the market.

**Internal Funds:** All ring-fenced assets of an insurance company, collective, specialised or dedicated, with and without guaranteed return.

**SFDR (Sustainable Finance Disclosure Regulation):** Sometimes also referred to as the "Disclosure Regulation", is an EU Regulation which places transparency on sustainability at the heart of the requirements, at the levels of both entities and investment products.

**Article 8 investment - SFDR classification:** A financial product that promotes, among other characteristics, environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices.

**Article 9 investment - SFDR classification:** This is a financial product with a sustainable investment objective.

**Corporate Social Responsibility (CSR):** Corporate Social Responsibility is the implementation of sustainable development by companies. A company that practises CSR will therefore seek to have a positive impact on society and respect the environment while remaining economically viable. It will achieve this balance with the help of its stakeholders, i.e. its employees, customers, suppliers, shareholders and local stakeholders. Companies that commit to implementing it will therefore voluntarily integrate these dimensions beyond the legal framework imposed on them by putting good practices in place.

**Sustainability risk:** An environmental, social or governance event or condition that, if it occurs, could have a significant actual or potential negative impact on the value of the investment.



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