

Self-regulation on transparency and disclosure for sustainability-related collective assets from 29 April 2024 (Version 2.1)

Status as of 18th June 2025

Free self-regulation for member institutions of the Asset Management Association Switzerland (AMAS) as well as other adherent institutions.

Preamble and introductory remarks

The market for sustainable investments is growing steadily and continually evolving. The asset management industry plays a key role in sustainability with regard to the management of collective assets and the production of collective investment schemes.

Active members of AMAS and other adherent market participants comply with this self-regulation in order:

- a. to contribute to sustainability in line with the Federal Council's guidelines (report dated 24 June 2020) and press release on sustainable financial investments (dated 17 November 2021);
- b. to ensure transparency and quality in the management and positioning of collective assets presented as sustainable or having sustainable characteristics;
- c. and thus to further strengthen the Swiss financial sector both nationally and internationally.

1. Purpose, scope of application, and guidelines for implementation

1.1. Purpose and scope of application

Art. 1 Purpose

The principles of this self-regulation form an integral part of the AMAS self-regulation architecture. They are intended to ensure quality in the management and positioning of sustainability-related collective assets, as well as transparency within the Swiss asset management industry. This self-regulation also contributes to the promotion and the reputation of the Swiss financial center.

Art. 2 Scope of supervision

This self-regulation is private and autonomous in nature and does not fall under the scope of supervision by FINMA under Art. 7 para. 3 FINMASA.

Art. 3 Sustainability

A collective asset presented as sustainable or having sustainability characteristics is a collective asset which, in addition to its financial goals, pursues at least one of the following investment objectives for at least 70% (excluding cash and derivatives)¹ of its assets:

- i. alignment (including transition) with one or more specific sustainability goals, or
- ii. contribution to the achievement of one or more specific sustainability goals.

The sustainability goal(s) pursued is (are) defined according to:

- i. a well-defined reference framework, and
- ii. specific indicators that can be used to measure and monitor the sustainability goal(s) being pursued.

The relevant sustainability goals may be pursued by one or more sustainability approaches with reference to one or more reference frameworks².

The reference framework for the sustainability goals may in particular be:

- i. criteria adopted by a national or foreign public body ;
- ii. criteria developed by a non-governmental body ;
- iii. the use of criteria reflecting generally accepted industry practice, and/or
- iv. the use of criteria developed by the fund management company or the asset manager itself.

A collective asset is not considered to be presented in a sustainable manner or to have sustainability characteristics if:

- reference is made only to individual elements of sustainability (e.g. exclusions or ESG integration only or an indication that no investments are made in assets on the Swiss Association for Responsible Investments (“SVVK-ASIR”) exclusion list³), or
- a sustainability report is published for a non-sustainable portfolio.

In both cases, it has to be made clear that the portfolio is not managed sustainably.

Art. 4 Institutional and geographic scope of application

This self-regulation applies, unless otherwise stated, to the following institutions that are active members of AMAS, insofar as they manage sustainability-related collective assets in Switzerland (let. a) and/or operate as Swiss sustainability-related collective investment schemes or producers thereof (let. b):

- a. Fund management companies (Art. 32 et seqq. FinIA), SICAVs (Art. 36 et seqq. CISA), limited partnerships for collective investment (Art. 98 et seqq. CISA), SICAFs (Art. 110 et seqq. CISA), L-QIFs (Art. 118a et seqq. CISA), managers of collective assets (Art. 24 para. 1 FinIA), portfolio managers (Art. 17 FinIA), and institutions that are exempt from the duty to obtain authorization as a manager of collective assets on the basis of Art. 6 FinIA and Art. 9 para. 2 FinIO (banks under the Banking Act, securities firms under the FinIA, and insurance companies under the Insurance

¹ For asset management mandates, the minimum threshold agreed with the client applies.

² Ex: Appendix 1 and 2.

³ “Exclusion recommendations” list published by the SVVK-ASIR.

Supervision Act (ISA)) and manage sustainability-related collective assets (Art. 24 para.1 FinIA) (hereinafter referred to collectively as “Asset managers”).

- b. Fund management companies (Art. 32 et seqq. FinIA), SICAVs (Art. 36 et seqq. CISA), limited partnerships for collective investment (Art. 98 et seqq. CISA), and SICAFs (Art. 110 et seqq. CISA) and L-QIFs (Art. 118a et seqq. CISA), that operate as fund management companies, SICAVs, limited partnerships for collective investment or SICAFs or L-QIFs for sustainability-related collective investment schemes or are identical to these (hereinafter referred to collectively as “Producers of collective investment schemes”).

Producers of collective investment schemes that also operate as Asset managers must comply with the principles set out in both sections 2 and 3 below.

Art. 5 Scope of application in terms of activities

This self-regulation applies exclusively to administration, asset management, and – in the case of collective investment schemes – production. It does not cover other financial services (Art. 3 let. c FinSA) or the offering of financial instruments as defined by the FinSA (Art. 3 let. g FinSA).

Art. 6 Adherence

Non-members may adhere to this self-regulation on a voluntary basis by informing AMAS in writing or another form demonstrable via text.

Art. 7 Transparency with regard to collective assets

In principle, three levels are relevant to transparency for sustainability-related collective assets:

- a. appropriate organization for the management of collective assets at the institute level (“financial institution level”);
- b. sustainability-related information of collective assets (“product level”);
- c. and the investment advisory and asset management processes at the point of sale (“financial service level”).

This self-regulation exclusively governs the first two levels (let. a and let. b hereinabove)

1.2. Guidelines for implementation

Art. 8 Principles

This self-regulation is principles-based. The principles define minimum standards for Asset managers and producers of collective investment schemes. Each institution applies them within the context of its own specific activities and can do so with reference to norms and regulations from by other associations and organizations. Individual institutions are free to take measures that go beyond the principles set out herein and in particular to include mandates of all kinds.

Art. 9 Foreign regulations

Where an institution meets the relevant requirements at par with foreign regulations with regard to the object of this self-regulation, it is considered to meet the requirements of this self-regulation as well.⁴ In this respect, it is permissible for the institution to implement the applicable foreign regulations only for some of its collective assets, provided the remaining collective assets meet the requirements of this self-regulation.

Any binding FINMA requirements, in particular regarding collective investment schemes under Swiss law, apply notwithstanding.

Art. 10 Duties

This self-regulation does not establish or nullify any duties under civil law. It does not release the Asset managers and producers of collective investment schemes that comply with it from the requirement to comply with existing duties under supervisory and civil law, including the applicable self-regulation. The applicable provisions of Swiss financial market laws and ordinances, FINMA regulations, and the relevant self-regulation are not affected by this self-regulation. Any binding requirements under FINMA's supervisory practices apply notwithstanding.

2. Principles for Asset managers

Art. 11 Infrastructure, resources, and organization

Asset managers ensure that the necessary infrastructure is in place, sufficiently qualified resources are employed, and the organizational requirements are met to achieve the sustainability objectives set out in the investment policy, and/or strategy.

Art. 12 Processes

Asset managers ensure that their governance as well as their reporting, investment, and risk management processes are documented in writing or another form demonstrable via text and that the implementation of all sustainability requirements is ensured.

Art. 13 Knowledge

Both the governing body responsible for the Asset manager's overall management, supervision, and control and the operational level responsible for implementing sustainability requirements must possess the sustainability knowledge needed for their activities.

Art. 14 Delegation and sub-delegation

Asset managers ensure that, if asset management is delegated or sub-delegated, the following points in particular are set out in writing or another form demonstrable via text with regard to the central tasks involved in setting and/or implementing sustainability requirements:

- a. competencies and responsibilities;

⁴ As of 29th April 2024, the applicable norms of EU law are to be considered as comparable regulations.

- b. whether or not the delegee is authorized to sub-delegate;
- c. the accountability requirement of the delegate or sub-delegate;
- d. the Asset manager's control rights.

Art. 15 Sustainability policy

- ¹ The basic principles of the sustainability policy applied in managing collective assets presented as sustainable or with sustainable characteristics must be set out in the asset management agreement or in another document referred to in the asset management agreement.
- ² The asset management agreement or the document referred to in the asset management agreement must set out which sustainable goals within the meaning of Art. 3 are implemented and by which sustainability approaches defined in the Appendix, or their implementation by other approaches (Mapping⁵).
- ³ Any deviation from the definitions in the Appendix must be specifically mentioned and the nature and extent of the deviation explained.
- ⁴ The asset management agreement or the document referred to in the asset management agreement must set out the minimum proportion of investments that must meet the sustainability requirements defined in the investment policy, precisely the minimum threshold of investments that must be managed with reference to sustainability in accordance with the investment policy. The percentage of investments not covered by the sustainability requirements must be stated and explained. Compliance with the minimum threshold is determined on the basis of the time at which the investment decision is made or, in the case of portfolios of collective assets that replicate a sustainability index, the time of the index adjustment(s).
- ⁵ The sustainability metrics that are relevant for the implementation of the investment strategy must be documented in an easily understandable form in writing or another form or another form demonstrable via text (e.g. in the internal procedure of the Asset manager). The sustainability metrics must be published and the methodology used to calculate them clearly explained.
- ⁶ Collective investment schemes are governed in accordance with Art. 25.

Art. 16 Data

- ¹ When using third party providers of data, research and/or sustainability analysis tools in the investment process, the Asset manager exercises due diligence required by the circumstances in the selection, instruction and monitoring thereof. In the case of collective investment schemes, the producer may take responsibility for this instead of the Asset manager.
- ² The sustainability data criteria that are relevant to the investment process and the audit interval must be documented by the Asset manager in writing or another form demonstrable via text (e.g. the internal procedure of the Asset manager). In the case of collective investment schemes, the producer may take responsibility for this instead of the Asset manager.
- ³ Every third-party provider of sustainability research and/or analysis tools used directly in the investment process must be described in the asset management agreement or another document referred to in the asset management agreement. This only applies to commercial data providers, not to data sources that are public and/or available free of charge. Collective investment schemes are governed in accordance with Art. 25 para. 5.

⁵ Cf. Appendix 3.

Art. 17 Further clarification

- ¹ The Asset Manager who defines an alignment objective must describe in the asset management contract or the document indicated as a reference in the asset management contract how this objective is concretely implemented within the framework of the investment process.
- ² Where stewardship is conducted, the asset management agreement or another document referred to in the asset management agreement explains the underlying stewardship principles (including the key elements of the escalation process, the process for selecting target investments, coordination with other investors, the process for gaining influence over the target company and the processes for evaluating the effectiveness of active shareholding). Collective investment schemes are governed in accordance with Art. 26 para. 2.
- ³ Asset managers that pursue an impact strategy must describe in the asset management contract the management process that should enable the targeted impact to be achieved, define the key performance indicators for measuring the actual impact and monitor these indicators in order to optimise the investment strategy if necessary. In doing so, the Asset Manager ensures that the basic principles of the targeted impact are described in the asset management agreement with reference to the relevant key performance indicators (KPIs). Collective investment schemes are governed in accordance with Art. 26 para. 3.
- ⁴ Collective assets that only employ exclusion or ESG integration approaches do not qualify as sustainability-related collective assets. Such collective assets should not be presented as sustainable or as having sustainable characteristics. Any reference to the sole use of exclusions or sole ESG integration (i.e. not combined) must clearly state that the collective assets are neither sustainable nor sustainably managed. In all other respects, such collective assets are not covered by this self-regulation.
- ⁵ Where exclusions are used in combination with other sustainability approaches (including ESG integration), the exclusion criteria must be disclosed in the asset management agreement or in another document referred to in the asset management agreement. Simply excluding companies that are active in the production, sale, and storage of controversial weapons (e.g. in line with the exclusion list published by SVVK-ASIR) is not sufficient to justify a reference to the use of exclusion criteria. Collective investment schemes are governed in accordance with Art. 26 para. 5.
- ⁶ In the case of collective assets that replicate a sustainability index, the above requirements, where relevant, apply *mutatis mutandis* to the index. It should be explained how the index is composed and how it is compatible with, or contributes to, the sustainable investment goals set.

Art. 18 Exemptions

- ¹ In the case of pension portfolios, Asset managers may deviate from the requirements set out in Arts. 11-17 and Art. 21 through agreement with the client.
- ² Deviations from the requirements set out in Arts. 11-17 and Art. 21 are also possible at the request of producers of collective investment schemes that have not affiliated to this AMAS self-regulation.
- ³ Asset managers must disclose all deviations to their clients in writing or another form demonstrable via text.

Art. 19 Risk control

- ¹ When implementing investment decisions, Asset managers ensure compliance with the sustainability policy that has been agreed in line with the client's investment objectives.
- ² Independent risk control regularly reviews compliance with the sustainability requirements set out in Arts. 11-18. Collective investment schemes are governed in accordance with Art. 27.

Art. 20 Advertising

Where an Asset manager publishes advertising in its own name for sustainability-related collective investment schemes, it must ensure that such advertising does not contradict the information provided in the relevant legal documents, such as the prospectus, fund regulations, company agreement, and/or key information document (if available). In particular, the information provided in the relevant legal documents must match that provided in the advertising.

Art. 21 Reporting

- ¹ The Asset manager or a third party (e.g. the fund management company) informs the investors or the principal about the investment goals in accordance with Art. 3 at least once a year in the form of a sustainability report (e.g. as part of regular reporting or on its website). The sustainability report describes the investment goals and the sustainability approaches employed and compares the key ratings, metrics or other important information, where relevant, against the benchmark (including the specific indicators used to measure and monitor the sustainability goal(s) pursued). If a stewardship approach is employed, a report must be drawn up on the objectives set, the number of interviews conducted, the results of the commitment and compliance with the process. A reference to an aggregated reporting at the institution level is sufficient.
- ² In the case of impact investing strategies, the Asset manager or a third party (e.g. the fund management company) discloses at least once a year the extent to which collective assets have met the communicated sustainability targets.
- ³ In the case of real estate funds under Swiss law, the Asset manager or a third party (e.g. the fund management company) discloses the sustainability indicators set out in the AMAS “Specialised information factsheet” on the key figures of real estate funds.
- ⁴ If reports are provided entirely or in part by a third party, the asset management agreement must mention this fact and state where the reports are to be found. Collective investment schemes are governed in accordance with Art. 29 para. 5.

Art. 22 Responsibilities for collective investment schemes

Where the producer of a collective investment scheme does not manage the collective investment scheme itself but has not agreed with the Asset manager that responsibility for compliance with the requirements set out in Art. 16, Art. 17 para. 1, and Art. 21 paras. 1 and 3 lies with the Asset manager, the producer remains solely responsible for compliance with these requirements.

3. Principles for producers of collective investment schemes

Art. 23 Knowledge

- ¹ The executive management of the producer of collective investment schemes must possess basic sustainability knowledge as well as knowledge of the basic principles of the sustainability strategy employed for its sustainability-related collective investment schemes.
- ² Producers of collective investment schemes ensure that the staff responsible for sustainable collective investment schemes possess sufficient knowledge to allow them to fulfill their duties in relation to sustainability-related collective investment schemes.
- ³ If a third party is responsible for managing the assets of a collective investment scheme instead of the producer, and if the Asset manager periodically confirms to the producer that it meets the requirements under Art. 13, it is in principle sufficient for the producer’s executive management and any persons or

units responsible for checking the third party's compliance in terms of sustainability to possess basic sustainability knowledge. In this respect, the producer of collective investment schemes itself does not have to meet the remaining requirements under paras. 1 and 2.

Art. 24 Delegation and sub-delegation

Producers of collective investment schemes ensure that, if asset management is delegated or sub-delegated, the following points in particular are set out in writing or another or another form demonstrable via text with regard to the central tasks involved in setting and/or implementing sustainability requirements:

- a. authorities and responsibilities;
- b. whether or not the delegatee is authorized to sub-delegate;
- c. the accountability requirement of the delegate or sub-delegate;
- d. the control rights of the producer of collective investment schemes.

Art. 25 Sustainability policy

- ¹ Producers of collective investment schemes set out the basic principles of the sustainability policy applicable to a collective investment scheme presented as sustainable or with sustainable characteristics in the collective investment scheme's fund regulations or company agreement and/or its prospectus.
- ² The fund regulations or company agreement of a sustainability-related collective investment scheme must set out which sustainable goals within the meaning of Art. 3 are implemented and by which sustainability approaches defined in the Appendix, or their implementation by other approaches (Mapping⁶).
- ³ Any deviation from the definitions in the Appendix must be specifically mentioned and the nature and extent of the deviation explained.
- ⁴ The fund regulations or company agreement of a sustainability-related collective investment scheme must set out the minimum proportion of investments that must meet the sustainability requirements defined in the investment policy, precisely the minimum threshold of investments that must be managed with reference to sustainability in accordance with the investment policy. The proportion of investments not covered by the sustainability requirements must be stated and explained. Compliance with the minimum threshold is determined on the basis of the time at which the investment decision is made or, in the case of portfolios of collective assets that replicate a sustainability index, the time of the index adjustment(s).
- ⁵ Any external sources that supply sustainability data to a sustainability-related collective investment scheme must be disclosed in the prospectus and/or the fund regulations or company agreement or in another document referred to in the prospectus and/or the fund regulations or company agreement. This only applies to professional data providers, not to data sources that are in the public domain and/or available free of charge.
- ^{5bis} The sustainability metrics that are relevant for the implementation of the investment strategy must be documented in an easily understandable form in writing or another form or another form demonstrable via text (e.g. in the internal procedure of the Asset manager). The sustainability metrics must be published and the methodology used to calculate them clearly explained.
- ⁶ The sustainability policy information in the prospectus and the fund regulations or company agreement of a sustainability-related collective investment scheme should be clear, concise, and easy to understand and should contain the information required to make a well-founded investment decision.

⁶ Cf. Appendix 3.

Art. 26 Further clarification

- ¹ If an alignment objective is defined, the prospectus or fund contract must describe how this objective is implemented in practice as part of the investment process.
- ² Where stewardship is conducted (“active shareholding”), the asset management agreement or another document referred to in the asset management agreement explains the underlying stewardship principles (including the key elements of the escalation process, the process for selecting target investments, coordination with other investors, the process for gaining influence over the target company and the processes for evaluating the effectiveness of active shareholding). If these underlying stewardship principles are provided by the collective investment scheme’s Asset manager, the Asset manager periodically confirms to the producer that it has provided them.
- ³ If an impact strategy is pursued, it is the asset manager's responsibility to describe in the prospectus or fund contract the management process by which the desired impact is to be achieved, to define the key performance indicators for measuring the actual impact and to monitor these indicators in order to optimise the investment strategy if necessary. In doing so, the asset manager ensures that the desired impact is outlined in the fund contract or in the company's articles of association, using the relevant key performance indicators (KPIs).
- ⁴ Collective investment schemes that only employ exclusion or ESG integration approaches do not qualify as sustainability-related collective assets. They may not be described or positioned as sustainable. Any reference to the sole use of exclusions or sole ESG integration (i.e. not combined) must clearly state that the collective assets are neither sustainable nor sustainably managed. In all other respects, such collective assets are not covered by this self-regulation.
- ⁵ Where exclusions are used in combination with other sustainability approaches (including ESG integration), the exclusion criteria must be disclosed in the prospectus. Simply excluding companies that are active in the production, sale, and storage of controversial weapons (e.g. in line with the exclusion list published by the Swiss Association for Responsible Investments) is not sufficient to justify a reference to the use of exclusion criteria. If the exclusion criteria are provided by the collective investment scheme’s Asset manager, the Asset manager periodically confirms to the producer that it has provided them.
- ⁶ In the case of collective investment schemes that replicate a sustainability index, the above requirements, where relevant, apply *mutatis mutandis* to the index. It should be explained how the index is composed and how it is compatible with, or contributes to, the sustainable investment objectives set.

Art. 27 Risk control

Compliance with the sustainability policy requirements set out in the fund regulations or company agreement is assessed regularly and in an appropriate manner by an independent risk control body of the producer of collective investment schemes or the Asset manager.

Art. 28 Advertising

Where a producer of collective investment schemes publishes advertising in its own name for sustainability-related collective investment schemes, it must ensure that such advertising does not contradict the information provided in the relevant legal documents, such as the prospectus, fund regulations, company agreement, and/or key information document (if available). In particular, the information provided in the prospectus or key information document must match that provided in the advertising.

Art. 29 Reporting

- ¹ The Asset Manager or a third party (e.g. the fund management company) will inform investors or the client of the investment objectives set out in Art. 3 in the form of a sustainability report at least once a year (e.g. as part of the regular reporting or by publication on a web page). This sustainability report describes the investment objective and the sustainability approaches applied, comparing the most important ratings, indicators or other relevant information with the benchmark index where relevant (including the specific indicators used to measure and monitor the sustainability objective(s) pursued). If stewardship is applied as a sustainable approach, a report on the objectives set, the number of interviews conducted, the results of the engagement and compliance with the process must be made. Reporting can also be done by referring to global reporting at the level of the financial institution.
- ² If the report is provided by the collective investment scheme's Asset manager, the Asset manager periodically confirms to the producer that it has provided the investors with a report meeting the above requirements.
- ³ In the case of impact investing strategies, the producer of a collective investment scheme or a third party (e.g. the Asset manager) discloses at least once a year the extent to which the collective investment scheme has met the communicated sustainability targets (e.g. by publishing details on its website). If this is done by the collective investment scheme's Asset manager, the Asset manager periodically confirms to the producer that it meets the above requirements.
- ⁴ In the case of real estate funds under Swiss law, the producer of collective investment schemes or a third party (e.g. the Asset manager) discloses the sustainability indicators set out in the AMAS "Specialised information factsheet" on the key figures of real estate funds. If this is done by the collective investment scheme's Asset manager, the Asset manager periodically confirms to the producer that it meets the above requirements.
- ⁵ The fund regulations or company agreement and/or the prospectus and/or the website of the producer of sustainability-related collective investment schemes must state where the reports are published (e.g. on the Asset manager's website) or from where they can be requested.

4. Concluding provisions

Art. 30 Entry into force

- ¹ This self-regulation enters into force on 1st September 2024, with the exception of the duties it contains that depend on the submission and approval of the amended fund documents as required under Art. 30 para. 2 (in particular with regard to Arts. 15, 16, 17, 25, and 26).
- ² Amendments to the fund regulations, company agreement or prospectus must be submitted to FINMA by 1st March 2026.
- ³ For collective investment schemes being approved for the first time, the fund regulations or company agreement and the prospectus only need to meet the requirements of this self-regulation if the application for FINMA approval is made after 1st September 2025.
- ⁴ Existing agreements governing the management of pension assets only need to be amended during the next revision after the transition period stipulated in para. 2 expires. The amendment of an appendix to the asset management agreement, which can be carried out unilaterally, is not deemed to be a revision for the purposes of this paragraph.
- ^{4bis} New agreements governing the management of pension assets must be only updated at the time of the next revision after the transition period stipulated in para. 2.
- ⁵ Existing delegation and sub-delegation agreements under Arts. 14 and 24 must be amended by 1st September 2025 at the latest.

- ^{5bis} New delegation and sub-delegation agreements under Arts. 14 and 24 must comply with the requirements of this self-regulation from 1st September 2025.
- ⁶ The sustainability report published as part of regular reporting covers the first full reporting year after the approval of the fund documentation or after the approval of the amendments to the fund documentation under Art. 30 para. 2.
- ⁷ Existing real estate funds that only apply Exclusion in combination with Integration as sustainability approaches may be presented as sustainable or as having sustainable characteristics until 31 December 2028. From 1 January 2029 at the latest, these real estate funds must apply at least one additional sustainability approach pursuant to Art. 3, Art. 17 para. 4 and Art. 26 para. 4 in accordance with Annex 1a, or they may no longer be presented as sustainable or as having sustainable characteristics.

Art. 30bis Independent audit

- ¹ Compliance with the self-regulation is verified by an independent, state-regulated audit firm based on an audit program drawn up by the Asset Management Association Switzerland.
- ² The audit is carried out with regard to the requirements for appropriate organisation at the financial institution level and with regard to sustainability-related information at the product level as a limited assurance review.
- ³ The state-regulated audit firm reports to the body responsible for the governance of the institution on the findings and the result of the audit.
- ⁴ The limited assurance review of the environmentally relevant key figures for real estate funds by a state-regulated audit firm, as recommended in AMAS Circular 04/2022 of 31 May 2022 and specified in AMAS Circular 06/2023, is mandatory for all annual reports with a closing date on or after 31 December 2028.

Art. 30ter Joining members

- ¹ Members joining AMAS must comply with this self-regulation by the end of the first full financial year following the year in which the member is admitted.
- ² These members must comply with art. 30bis for the year after the first full financial year following the year in which the member is admitted.

Art. 31 Enforcement of this self-regulation

- ¹ The body responsible for the overall management, supervision, and control of the Asset manager and/or the producer of collective investment schemes is responsible for compliance with this self-regulation. To this end, it relies on the independent checks carried out by the persons or units responsible for assessing compliance (e.g. its compliance or risk management department).
- ² In the event of violations of this self-regulation, the Asset manager or producer of collective investment schemes must take suitable measures to avoid further violations. The Asset manager or producer of collective investment schemes must document violations and measures taken in writing or another form demonstrable via text.

English is not an official language of the Swiss Confederation. This translation is provided for information purposes only, has no legal force and may not be relied on in legal proceedings. In cases of discrepancy, the original German text shall prevail.

Appendix 1 – Sustainable investment approaches (excl. real estate funds)

The following definitions of sustainable investment approaches (a to f) are essentially based on the AMAS and SSF document “How to Avoid the Greenwashing Trap: Recommendations on Transparency and Minimum Requirements for Sustainable Investment Approaches and Products”. ESG here stands for environmental (e.g. energy/water consumption and biodiversity), social (e.g. appeal as an employer and supply chain management), and governance (e.g. remuneration policy and board supervision). The most important sustainable investment approaches include the following:

- a. **Exclusions:** This includes both negative screening and norm-based exclusions that systematically rule out specific issuers from an investment portfolio due to activities or business practices that violate given norms or values based on clients’ preferences or due to anticipated risks.
- b. **Best in class/positive screening:** This approach involves constructing portfolios on the basis of binding sustainability criteria with the aim of outperforming a peer group (e.g. portfolio better than benchmark, overweighting good stocks, underweighting bad stocks or avoiding stocks that fare badly in a peer group comparison). Exceptions from the criteria are possible, but they must be specified in detail.
- c. **ESG integration:** This entails taking sustainability risks and opportunities into account in traditional financial analysis and investment decision-making on the basis of systematic processes and appropriate research sources.
- d. **Thematic investments:** This refers to investments that contribute to sustainable solutions in the environment or social dimension with regard to a specific theme.
- e. **Impact investing:** Impact investments intend to generate a measurable, beneficial social and/or environmental impact alongside a financial return. Important differentiating factors from other forms of sustainable investments (namely thematic investments) are the intentionality of an investment in a sector, or an activity that has such a positive impact; the management process that allows for a direct impact or an impact approach; and the measurability of the impact (depending on the asset class) through relevant key performance indicators (KPIs).
- f. **Stewardship (active ownership):** The terms “stewardship” and “active ownership” are often used to refer to a combination of engagement and voting.
 - i. **Voting:** This term refers to investors expressing their preferences with regard to sustainability issues by actively exercising their voting rights based on sustainability principles or guidelines.
 - ii. **Engagement:** Engagement refers to an active dialog between shareholders and management of investee companies or other relevant stakeholders with the aim of convincing them to consider environmental, social, and governance criteria within their sphere of influence.
- g. **Climate-alignment:** The climate alignment of a portfolio refers to the reduction of the environmental footprint over time by lowering its greenhouse gas emissions or those of the issuers it contains. For this purpose, the definition of greenhouse gas emissions in the Greenhouse Gas (GHG) Protocol is used, including at least scopes 1 and 2 and ideally scope 3 emissions in sectors where scope 3 emissions make up a material share of total emissions. Climate alignment should involve formulating a long-term target along with interim targets. The methodology applied should be based on internationally recognized standards such as the PAII Net Zero Investment Framework, the UN Asset Owner Alliance Target Setting Protocol or the Science Based Targets Initiative’s framework for financial institutions.

Appendix 1a – Sustainable investment approaches for real estate funds

The following definitions of sustainable investment approaches for real estate funds (1-5) are essentially based on the AMAS and SSF document “How to Avoid the Greenwashing Trap: Recommendations on Transparency and Minimum Requirements for Sustainable Investment Approaches and Products.” The most important sustainable investment approaches for real estate funds include the following:

- a. **Exclusions:** In the case of real estate funds, this means systematically excluding specific properties from an investment portfolio because the defined characteristics of the property itself and/or the tenants or a specific proportion of tenants of a commercial property have a negative impact in terms of sustainability.

Implementation: Exclusion from the investment portfolio of properties with, for example, insufficient energy efficiency, an exclusively fossil fuel-powered energy supply, poor public transport links or no certification (SNBS or CECB) or commercial properties with specific tenants (e.g. those that make most of their revenue from trading fossil fuels, adult entertainment services or the sale of weapons).

- b. **Best in class:** This approach involves constructing and developing a portfolio and/or deciding on investment transactions on the basis of binding criteria with the aim of ensuring that the portfolio or individual properties outperform a benchmark portfolio or index. Exceptions from the criteria are possible, but they must be specified in detail.

Implementation: Use of benchmarks or other criteria in portfolio construction and development, property transactions, and the development of properties or construction projects (e.g. REIDA, CECB, BREEAM, Minergie or SNBS). For example, properties rated “good” in a peer-group comparison may be overweighted and those rated “bad” underweighted, or only “good” properties may be selected.

- c. **Integration:** This entails taking environmental and/or social factors into account in investment decisions and throughout the life cycle of a property on the basis of targeted processes and data analysis.

Implementation: Specifically, integration means taking environmental and/or social factors into account when buying, constructing, developing, administering, and managing properties throughout their life cycle. This involves assessing development opportunities and goals and reviewing them on a regular basis. This can mean, for example, replacing fossil fuel-powered heating systems, increasing the use of renewable energy, installing photovoltaic panels, collecting data, monitoring energy use, conducting tenant surveys, raising awareness among tenants, pursuing labeling strategies, designing exterior spaces, and promoting mobility and a circular economy.

- d. **Thematic investments:** This refers to investments in properties that contribute to sustainable solutions in the environmental or social dimension with regard to a specific theme.

Implementation: Investments in properties that use sustainable building materials, e.g. wood, or those that focus on environmental or social issues, e.g. housing for senior citizens, people with disabilities, and students.

- e. **Climate alignment:** A climate-aligned real estate fund must meet the requirements under Swiss law or commit to achieving an internationally recognized net-zero target by 2050 at the latest and draw up a binding plan for doing so.

Implementation: The real estate fund’s investment strategy is geared to achieving a statutory target (e.g. the Swiss government’s target of net-zero CO₂ emissions by 2050 at the latest) or an

internationally recognized target for real estate funds, by means of investment decisions and/or optimization or development measures. The real estate fund has a plan outlining how its property portfolio will achieve the target, including milestones and a reduction pathway. Progress made toward achieving the target is reviewed on a regular basis and disclosed annually.

Appendix 2 – Examples of sustainability goals and reference frameworks

Examples of sustainability goals

Sustainability objectives may include (but are not limited to):

- (i) Favouring investments in securities of issuers that have relatively good sustainability operational excellence compared to the relevant reference framework(s) or that are demonstrably striving to improve their sustainability operational excellence (e.g. companies or states with above-average ESG scores) ;
- (ii) Avoiding investing in securities of issuers whose sustainability operational excellence is comparatively low in relation to the relevant reference framework(s) (e.g. companies with below average ESG scores);
- (iii) Investments in sustainable economic activities: investment in securities whose issuers manufacture products or provide services that help solve sustainability problems (e.g. wind turbine manufacturers); including investments in Green, Social or Sustainability Bonds;
- (iv) Improvement in the environmental, social and/or governance scores or a performance indicator of the portfolio relative to a reference value (e.g. a benchmark index), for example in relation to the carbon intensity of the portfolio over time or relative to a reference value (e.g. a benchmark index); or
- (v) Investments that show a direct and measurable improvement in terms of real economic improvement of a sustainability problem (e.g. direct investment in a wind turbine).

Sustainability goals for real estate funds may include (but are not limited to) the following:

- (vi) Portfolio construction and development on the basis of binding criteria that gear the property portfolio to outperforming a defined benchmark (e.g. an average energy mix that includes a comparatively high proportion of non-fossil sources, a comparatively low average energy intensity or a comparatively low average intensity of greenhouse gas emissions);
- (vii) Investments in properties that, on the basis of binding criteria, outperform a benchmark (e.g. properties that exhibit comparatively high energy efficiency, are connected to a sustainable energy supply, have good public transport links, and/or are certified (SNBS, CECB, etc.));
- (viii) Investments in properties that contribute to sustainability from an environmental standpoint (e.g. by reducing “gray” energy and greenhouse gas emissions or using sustainable building materials);
- (ix) Investments in properties that contribute to sustainability from a social standpoint (e.g. housing for senior citizens and students, daycare, and other services for families); or
- (x) Achievement of the Swiss government’s net-zero target by 2050 at the latest by defining milestones and a reduction pathway for the property portfolio.

Examples of reference frameworks

Reference frameworks for sustainability goals may include (but are not limited to) the following:

- (i) Swiss Climate Scores or the EU taxonomy ;
- (ii) SASB standards or the United Nations Sustainable Development Goals;
- (iii) the use of external data or analysis containing ESG ratings and/or metrics (for example, using ESG ratings and/or scores that can be obtained from an external data or analysis provider), and/or
- (iv) proprietary rating models (for example, using internally developed ESG ratings and scores).

Appendix 3 – Classification

This classification exemplifies current market practice and may evolve over time.

Characteristic for the classification of a sustainability goal	Sustainability Approach according to AMAS
Alignment:	Best-in-class / Positive screening
	Stewardship
	Thematic
	Climate alignment
Contribution:	Stewardship (as part of a portfolio engagement strategy)
	Impact
Not sufficient for reference to sustainability:	ESG-Integration (as standalone)
	Exclusion (as standalone)
	ESG-Integration and/or Exclusion and/or Proxy Voting Only Strategies (combined)
	Proxy Voting Only Strategies (as standalone)

Side-note:

Approaches that are listed by default under the alignment characteristic might also be classified as contribution, provided they are implemented in a manner that achieves a demonstrable positive contribution to one or more sustainability goals.”

Best-in-class / Positive screening:

The "best-in-class"/"positive screening" sustainable investment approach aims to invest in securities issuers that have a higher environmental and/or social impact than their peer group as measured by various (product- and process-oriented) sustainability indicators. This approach is therefore assigned to the "alignment" category.

Appendix 4 – ESG building blocks⁷

The ESG modules are provided as model texts that can be used as part of the approval procedures and updates of prospectuses and/or fund contracts for collective investment schemes referring to sustainability.

Impacted model document	Reference (Self-regulation on transparency and disclosure for sustainability-related collective assets from 26 September 2022; “SR”)	Suggested building blocks for the model document / Remarks
Prospectus		
1.10.1 Investment objective	Art. 25 Sustainability policy	Additional information The fund's investment policy is that of a financial product [mention the sustainability approach(es) used and explain the methodology used]. i) Detailed definition of the foundations of the sustainability policy applicable to the collective investment scheme, and ii) Definition and list of sustainability approaches applied (see appendix 1 SR). Explanation of any deviations from the definitions given in Annex 1 (see above). Precise implementation of the sustainability approaches mentioned above (or description in accordance with FINMA practice).

⁷ English is not an official language of the Swiss Confederation. This translation is provided for information purposes only, has no legal force and may not be relied on in legal proceedings. In cases of discrepancy, the original German text shall prevail.

1.10.2 Investment policy	Art. 25 Sustainability policy Art. 26 Clarifications	Complement - minimum scope (e.g., not exhaustive) The fund management company/asset manager invests at least X% of the fund's assets in investments that comply with the requirements of the sustainable development policy. Or (alternative) : The fund management company/asset manager manages at least X% of the fund's assets in accordance with the sustainable development policy. Or (alternative) : The fund management company/asset manager may invest a maximum of X% of the fund's assets in investments that do not comply with the requirements of the sustainable development policy. Or (alternative) : The fund management company/asset manager may not apply the sustainable development policy to more than X% of the fund's assets. Explanations and details on the proportion of investments that do not meet sustainability requirements. Complement - external data suppliers Reference to the external data providers (if applicable for each sustainability approach, if not uniform) used to obtain the sustainability data or reference to the
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		place where the data providers are published (e.g. website). Illustrative list: [ESG factors relevant to the approaches applied] these are generally determined on the basis of information provided by a specialist external service provider(s) such as [...]. Raw data obtained from external professional data providers is updated at least once a year. Complement - Climate-friendly approach Outline of the methodology used or reference to the methodology of a third party (indicate which third party and where the methodology is published). Complement - Stewardship Mention of where information on the stewardship policy can be found (e.g. by a link to the home page). [e.g. exercise of voting rights and/or commitment]. Complement - Exclusion Where exclusionary practices are used in conjunction with other sustainable approaches : [Optional: link to the website where the exclusions are mentioned]. Supplement - Positive tilt approach The proportion of ESG-rated investments contained in the segment represents at least X% [e.g. of net assets, to be adapted on a case-by-case basis]. Disclosure of exclusion criteria. [N.B.: it is not sufficient to simply refrain from investing in companies linked to controversial
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		weapons, e.g. SVVK.] If necessary, information on such insufficient exclusion criteria should be provided separately from the information on the sustainability policy. [N.B.: for collective investment schemes that replicate a sustainability index, the requirements apply by analogy to the replicated index, insofar as they are relevant].
1.15 Essential risks	<i>passim</i> Art. 19 Risk control	Additional information Explanations and details of the risks associated with applying sustainability to the product concerned. [Optional] Explanation and details of the method used to reduce the risks for the product concerned.
2.6 Exercise of member and creditor rights	Art. 26 Clarifications	Supplement for active shareholding ("stewardship") Clarification [in the prospectus or by reference to a website] of the principles applicable to active share ownership activities (including the basis for the escalation procedure).
Model contract		
§ 8 Investment policy	Art. 15 par. 1 to 3 Sustainability policy	Additional information The fund's investment policy is that of a financial product [mention the sustainability approach(es) used and explain the methodology used]. Indication of the objectives of the sustainability policy (e.g. value orientation, improved return/risk profile, positive impact) [as more precise in the prospectus].

§ 8 Investment policy	Art. 15 par. 1 to 3 Sustainability policy	Reference to the sustainability approaches applicable to the sub-fund (FINMA practice). Implementation of the sustainability approaches mentioned above (or brief description of the order in accordance with FINMA practice). Complement - minimum scope (examples, not exhaustive) The fund management company/asset manager invests at least X% of the fund's assets in investments that comply with the requirements of the sustainable development policy. Or (alternative) : The fund management company/asset manager manages at least X% of the fund's assets in accordance with the sustainable development policy. Or (alternative) : The fund management company/asset manager may invest a maximum of X% of the fund's assets in investments that do not comply with the requirements of the sustainable development policy. Or (alternative) : The fund management company/asset manager does not apply the sustainable development policy to a maximum of X% of the fund's assets. Specification and explanation of the proportion of investments that do not meet sustainability requirements.
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		Complement - "Impact" strategy. Description of the targeted impact using the relevant key performance indicators (KPIs) (outline). Complement - Climate alignment approach Description of the Climate alignment approach. Where applicable, reference to other information on sustainability policy in the prospectus.
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