publica
THE PENSION PROVIDER

Investment Guidelines of the Federal Pension Fund PUBLICA

dated 15 April 2010 (updated 27 November 2025)[1]

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1 The Board of Directors approved amendments to these Investment Guidelines on 19 January 2012, 22 November 2012, 18 October 2013, 22 November 2016, 23 June 2017, 8 May 2019, 12 June 2020, 25 March 2021, 26 August 2021, 25 October 2022, 16 October 2023, 2 May 2025 and 27 November 2025. These amendments are indicated by footnotes.

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On the basis of the Federal Act on the Federal Pension Fund (PUBLICA Act, SR 172.222.1) of 20 December 2006, in effect since 1 July 2008,

specifically Article 11 paragraph 3 letter d, Art. 12 paragraph 6 and Article 15 thereof,

the **Board of Directors** hereby issues the following Investment Guidelines:

1. Chapter: Objective and principles

Art. 1 Objective

1 The assets of the Federal Pension Fund PUBLICA (hereafter "PUBLICA") are to be invested and managed in the interests of the active members and pension recipients.[2]

2 PUBLICA seeks to generate total returns that ensure its ability to fulfil its obligations in the long term, using appropriate risk limitation strategies.

3 Asset management decisions must take account of the risk-bearing ability of PUBLICA or the pension plans, respectively.[3] There must be sufficient funds at all times to disburse the benefits promised within the agreed timeframe.

Art. 2 Fundamentals

1 Asset management decisions must comply with the provisions of the Federal Act on Occupational Old Age, Survivors' and Disability Pension Plans (BVG, SR 831.40) and the Ordinance on Occupational Old Age, Survivors' and Disability Pension Plans (BVV2, SR 831.441.1), and all relevant provisions in effect.

2 In particular, the following provisions must be observed:

a. Article 51 paragraph 2 letter c BVG (parity in asset management)
b. Article 71 BVG (basic requirements of asset management)
c. Article 53a BVG (legal basis for the implementing provisions on loyalty in asset management)
d. Articles 48f – 60 BVV2 (integrity and loyalty in asset management, admissible investments, security, risk spreading, investments with the employer)[4]
e. [5]

3 The code of conduct for all persons involved in the investment and management of assets is derived from the prevailing law (BVG) and ordinance (BVV2). The way in which these legal provisions are implemented is set out in the Compliance Regulations.[6]

Art. 3 General principles

1 The following conditions apply to the investment of the assets:

a. The best practice standards must be observed;
a[bis].[7] Material external partners, all of which must enjoy a good reputation and satisfy proper business conduct requirements, must be selected in a clearly structured, documented and transparent process.

2 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016; editorial correction dated 25 October 2022.
3 Version as per resolution of the Board of Directors dated 22 November 2012, in force since 22 November 2012.
4 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
5 Deleted by resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
6 Version as per resolution of the Board of Directors dated 25 October 2022, in force since 25 October 2022.
7 Inserted by resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.

b. The operating, counterparty and regulatory risks must be monitored at all times and the investments protected as far as possible from human, process or system error or failure and the impact of external events;[8]
c. There must be an adequate risk distribution;
d. The risk incurred must be in proportion to expected performance;[9]
e. The marketability of assets must be taken into account (liquidity risk);
f. The risks involved in interest rate fluctuation must be given due consideration (interest rate risk);
g. A sufficient degree of liquidity must be ensured at all times;
h. For claims and debt instruments, the creditworthiness of debtors must be taken into account, and for shares and other equity instruments, the financial soundness of the companies in question;
i. For direct property investments, the location, size, possible uses, long-term yield potential and legal risks must be taken into account;[10]
j. Investment decisions should also address environmental, social and governance issues in accordance with the Responsible Investment Policy, provided these do not negatively impact the expected risk-adjusted return;[11]
k. The investment assets will be valued at market prices. Where no market prices are available, assets will be valued using transparent, recognised methods. These methods are set down in valuation guidelines.[12]

2[13] Extensions to the range of investment options in accordance with Article 50 paragraph 4 BVV2 are permitted, provided compliance with Article 50 paragraphs 1–3 BVV2 can be conclusively demonstrated in the notes to the annual financial statements.

3 The accounts are prepared in accordance with the Accounting and Reporting Recommendations of Swiss GAAP FER 26.[14]

2. Chapter: Organisation and responsibilities

Art. 4 Board of Directors

1 The Board of Directors bears overall responsibility for management of the assets. It is responsible for issuing and amending the Investment Guidelines. It determines one Strategic Asset Allocation for the closed pension plan, one for the open pension plans as a whole, and one for the PUBLICA Collective Institution as service provider and insurer.[15]

2 The Board of Directors:
a. elects the members of the Investment Committee and appoints its Chair;
b. appoints one or more Global Custodians for the deposit of movable assets;
c. appoints an external body as Investment Controller;
d.[16] appoints the ALM consultant;
e.[17]
f. takes note of the quarterly reports issued by the Investment Controller and the annual reports issued by the Investment Committee;[18]

8 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
9 Editorial correction dated 25 October 2022.
10 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
11 Version as per resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.
12 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
13 Inserted by resolution of the Board of Directors dated 23 June 2017, in force since 23 June 2017.
14 Inserted by resolution of the Board of Directors dated 25 October 2022, in force since 25 October 2022.
15 Version as per resolution of the Board of Directors dated 16 October 2023, in force since 1 January 2024.
16 Inserted by resolution of the Board of Directors dated 22 November 2012, in force since 22 November 2012.
17 Deleted by resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
18 Version as per resolution of the Board of Directors dated 27 November 2025, in force since 25 November 2025.

g.[19]

h. may issue, apart from or together with the Strategic Asset Allocations, additional guidelines on the management of individual asset classes or the use of certain asset instruments;[20]

i. adopts the principles by means of which environmental, social and governance issues are to be taken into account in investment decisions (Responsible Investment Policy).[21]

Art. 5 Investment Committee

1 On the basis of Article 12 paragraph 6 PUBLICA Act and in accordance with Article 11 paragraph 1 letter a of the Corporate and Organisational Regulations, an Investment Committee is appointed for the investment and management of the assets.

1bis The tasks of the Chair of the Investment Committee are carried out by an external investment expert.[22]

2 The Investment Committee comprises:

a. apart from the Chair, four other members chosen by the Board of Directors from among their number,[23]

b. apart from the Chair, up to two more external investment experts who may also be appointed by the Board of Directors to the Investment Committee.[24]

3 Apart from the election of the Chair, who is elected by the Board of Directors, the Investment Committee constitutes itself.[25]

3bis To prepare for the election of the external investment experts, the Board of Directors appoints a selection committee consisting of equal numbers of employer and employee. representatives from among its own members, which evaluates suitable candidates and proposes them to the Board of Directors for election. [26]

4 It may appoint sub-committees.

5 The CEO of PUBLICA and the Head of Asset Management attend meetings of the Investment Committee in a consultative capacity but with no voting rights.[27]

Art. 6 Tasks of the Investment Committee

The Investment Committee:

a. recommends the Strategic Asset Allocations to the Board of Directors;

b. oversees compliance with the Investment Guidelines and the Strategic Asset Allocations;

c. conducts a regular exchange of information with the head of Asset Management;

d. conducts a regular exchange of information with the Investment Controller and discusses the latter's reports with it;

dbis.[28] approves the specific benchmarks for each asset class;

dter.[29] regularly monitors the key assumptions of the ALM process (in particular the risk/return assumptions for each asset class) and decides whether a review of the Strategic Asset Allocation(s) should be initiated;

19 Deleted by resolution of the Board of Directors dated 25 March 2021, in force since 25 March 2021.
20 Version as per resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.
21 Inserted by resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.
22 Inserted by resolution of the Board of Directors dated 2 May 2025, in force since 2 May 2025.
23 Version as per resolution of the Board of Directors dated 2 May 2025, in force since 2 May 2025.
24 Version as per resolution of the Board of Directors dated 2 May 2025, in force since 2 May 2025.
25 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
26 Version as per resolution of the Board of Directors dated 2 May 2025, in force since 2 May 2025.
27 Version as per resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.
28 Inserted by resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
29 Inserted by resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.

e. approves the investment vehicle, type of implementation and external or internal asset managers for each asset class;[30]
f. applies to the Board of Directors for individual investments or transactions falling within its remit;
g. ensures oversight of the activities of external and internal asset managers;[31]
h. [32]
i. decides on direct property transactions in Switzerland (acquisitions, disposals, projects) where the investment value exceeds CHF 30 million as well as purchases of land without a project ready to be voted on where the value exceeds CHF 10 million;[33]
i[bis]. approves the real estate strategy for direct investments in Switzerland;[34]
j. reports periodically to the Board of Directors on the asset situation and management;
k. forwards the Investment Controller's reports to the Board of Directors;
l. immediately informs the Chair of the Board of Directors of any deviations from the Investment Guidelines and/or the Strategic Asset Allocations, as soon as these are detected.

Art. 7 Passing of resolutions[35]

1 The Investment Committee passes its resolutions on the basis of a simple majority of the members present.

2 In the event of a tie, the Chair has the casting vote.

2[bis] [36] The Chair decides on the form in which the meeting is to take place. The following options are available:

a. members physically present;
b. members present online;
c. hybrid, with some members physically present and others online.

Members are notified of the option chosen when they receive their invitation.

2[ter] [37] If the meeting is to be held with members physically present, the Chair may, by way of exception, permit a member to attend online if the member concerned provides a justification for doing so.

3 The Investment Committee may pass resolutions by circular letter. Such resolutions require a majority of two thirds of the members.[38]

Art. 8 Asset Management

The Asset Management department:

a. is responsible for the Tactical Asset Allocation, i.e. allocation to the various asset classes and the individual asset managers (portfolios) within the predefined ranges;
b. applies to the Investment Committee for internal and external asset managers;
c. enters into the agreements with the external asset managers following their approval by the Investment Committee and issues the required instructions for internal asset managers;[39]

30 Version as per resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
31 Version as per resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
32 Deleted by resolution of the Board of Directors dated 25 March 2021, in force since 25 March 2021.
33 Version as per resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.
34 Version as per resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.
35 Inserted by resolution of the Board of Directors dated 22 November 2012, in force since 22 November 2012.
36 Inserted by resolution of the Board of Directors dated 26 August 2021, in force since 26 August 2021.
37 Inserted by resolution of the Board of Directors dated 26 August 2021, in force since 26 August 2021.
38 Version as per resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
39 Version as per resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.

d. has its relevant teams carry out the investments for the internal mandates approved by the In-vestment Committee in accordance with the instructions approved by the Investment Committee for each mandate;
e. acts as the point of contact for external asset managers;
f. coordinates day-to-day operations with the custodian banks;
g. oversees the entire assets and the internal and external mandates and reports regularly to the Investment Committee;
h. immediately informs the Investment Committee of any deviations from the Investment Guidelines and/or the Strategic Asset Allocations, as soon as these are detected;
i. prepares direct property transactions in Switzerland and presents these to the Investment Committee and/or Asset Management Real Estate Committee for approval;[40]
j. drafts a summary report on the direct real estate investments in Switzerland for the Investment Committee, based on the annual report;[41]
k. is responsible for providing cash resources as needed;
l. informs the Investment Committee of the acquisition and disposal of holdings in companies that give rise to a legal reporting requirement;
m. keeps the minutes of the Investment Committee's meetings and drafts its agendas;
n. assesses new investment opportunities on an ongoing basis.

Art. 8a[42] Asset Management Real Estate Committee

1 The Committee is made up of the CEO of PUBLICA, the Head of Asset Management and the head of the real estate team.

2 The Asset Management Real Estate Committee approves
a. direct property transactions in Switzerland (acquisitions, disposals, projects) with an investment value up to CHF 30 million as well as purchases of land without a project ready to be voted on up to a value of CHF 10 million;
b. the budget and annual financial statements for the directly held Swiss real estate portfolio;
c. the selection of property managers for directly held properties in Switzerland.[43]

3 The Real Estate Committee takes its decisions by a simple majority of the three members. The Committee is quorate if two members are present.

Art. 9 Investment Controller

1 The external body charged with overseeing the investments (Investment Controller) may not be either an asset manager or custodian.

2 The Investment Controller:
a. oversees the implementation of the Strategic Asset Allocations and the investment process;
b. monitors the activities of the external and internal asset managers on an ongoing basis;
c. oversees compliance with the Investment Guidelines and reports to the Investment Committee on the performance and on compliance with the internal investment guidelines and the legal investment provisions;
d. includes all asset classes in its reporting.[44]

40 Version as per resolution of the Board of Directors dated 25 March 2021, in force since 25 March 2021.
41 Version as per resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.
42 Inserted by resolution of the Board of Directors dated 25 March 2021, in force since 25 March 2021.
43 Version as per resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.
44 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.

Art. 10 Custodians

1 One or more banks are appointed Global Custodians for the deposit of movable assets.

2 The custodian(s) is/are responsible for:

a. proper processing of basic global custody services, in particular:
   1. securities safekeeping,
   2. conducting all securities transactions;

b. ensuring proper business relations with the asset managers;

c. drafting and preparing all the information (reporting) on movable assets required for monitoring the asset managers and for investment controlling, in particular:
   1. calculating the investment returns of the various asset managers, asset classes and the overall portfolio, as well as the corresponding benchmark indices and investment risks,
   2. presenting the composition of the individual portfolios of the asset managers, asset classes and the overall portfolio and the corresponding benchmark indices;

d. supplying the data required for the maintenance of legally compliant securities accounting;[45]

e. securities lending.

3 The tasks of the Global Custodian(s) will be laid down in separate service level agreements.

Art. 11 Asset managers

1 Teams from the Asset Management department or external asset managers are appointed or commissioned to manage the movable assets.

2[46]

3 The asset managers are individually responsible for investing and managing specific portfolios, which are normally held with the Global Custodian(s).[47]

4 The asset managers will be given clearly defined mandates for each portfolio. Internally, this takes the form of instructions; for the directly held real estate in the form of the real estate strategy and for external managers, an investment management agreement is issued.[48]

5 In addition to the standard arrangements, each mandate must also specify at least the following points: size of the mandate, target of the mandate, investment parameters, admissible assets, benchmark (generally, neutral weighting with tactical ranges), investment percentage (max. 100%), use of derivative instruments, performance calculation method, content and frequency of reports, liability and compensation for damage, costs (exhaustive list), start (transition date) and termination of the mandate, cooperation with the Global Custodian(s).[49]

6 Only banks and financial intermediaries governed by relevant financial market or supervisory legislation in Switzerland or abroad are appointed as external asset managers.[50]

7 Instead of entrusting asset managers with the management of individual portfolios, investments may also be made in investment funds or with investment foundations or alternative funds, in derivatives and in structured products; these may be made via the appointed asset managers or directly by the Asset Management department.[51]

45 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
46 Deleted by resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
47 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
48 Version as per resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.
49 Version as per resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
50 Version as per resolution of the Board of Directors dated 18 October 2013, in force since 18 October 2013.
51 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.

Art. 12 Property managers for directly held real estate in Switzerland[52]

1 The running and management of property investments may be delegated to third-party companies.[53]

2 One or more property managers are commissioned by the Asset Management department, upon approval by the Asset Management Real Estate Committee, and are responsible for optimising the management and leasing of the properties.[54]

3 The tasks and duties will be set forth in a separate service level agreement with the property managers. This contract must cover at least the following points: start and termination of the mandate (contract period); purpose of the mandate, list of the properties to be entrusted; scope of authority in dealing with lessees, scope of authority in dealing with caretakers; [55]; obligation to draw up a property budget; spending authority; letting / rental policy; accounting; maintenance work; insurance; content and frequency of reports; fees.

4 The property manager reports to the Asset Management department on the dates specified by the Investment Committee.

Art. 13 Securities accounting[56]

1 Securities accounting covers investment accounting for the various asset classes outlined in these Investment Guidelines.[57]

2 The Finance division is responsible for the correct and timely integration of securities accounting and for monitoring the parties involved.[58]

3[59]

3. Chapter: Structuring of assets

Art. 14 Strategic Asset Allocations

1 The Board of Directors sets forth in a separate document the Strategic Asset Allocation for the closed pension plan, the Strategic Asset Allocation for the open pension plans as a whole, and the Strategic Asset Allocation for the PUBLICA Collective Institution as service provider and insurer (Article 11 paragraph 3 letter d PUBLICA Act). This states in binding terms the framework for investing PUBLICA's entire assets.[60]

2 The Strategic Asset Allocations are determined by:

a. the financial situation and risk capacity of the pension plans or of the PUBLICA Collective Institution as service provider and insurer[61]
b. the structure and expected development of the pool of active members / pension recipients[62]
c. the target return
d. PUBLICA's risk tolerance
e. the expected risk and return of the individual asset classes and their correlation.

52 Version as per resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
53 Version as per resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
54 Version as per resolution of the Board of Directors dated 25 October 2022, in force since 25 October 2022.
55 Deleted by resolution of the Board of Directors dated 25 March 2021, in force since 25 March 2021.
56 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
57 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
58 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
59 Deleted by resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
60 Version as per resolution of the Board of Directors dated 16 October 2023, in force since 1 January 2024.
61 Version as per resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.
62 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.

3 The Strategic Asset Allocations are reviewed at least once every four years, and adapted as necessary. In justified cases, the Board of Directors may extend the period depending on the individual circumstances.[63]

Art. 15 Asset classes

1 The Strategic Asset Allocations are conducted on the basis of asset classes into which the various assets are divided.

2 The main asset classes are set out in the Strategic Asset Allocations.[64]

3 The Strategic Asset Allocations assign a certain percentage of the assets to the individual asset classes. This sets a target value with specific minimum and maximum values for each asset class and for foreign currencies.

4. Chapter: Investments

Art. 16 Investment selection

1 Each investment must be manageable for PUBLICA having regard to available knowledge, processes and structures, size and reputation.

2 Investments are selected in accordance with a transparent and documented process.[65]

3[66]

4[67] All information on ratings and classification into investment grade and sub-investment grade in this document relates to the definitions used by Standard & Poor's Ratings Services and Moody's Investors Service. The Investment Committee may define further sources for external ratings and the methodology for their use at any time in separate rating guidelines.

Art. 17 Cash and money market investments

1 Cash in banks and postal cheques, time deposits, bonds and loans with a term of less than 12 months and other money market instruments in Swiss francs and foreign currencies may only be held with debtors with a good short-term credit rating. The specific requirements regarding the creditworthiness of counterparties and credit limits are set out in the instructions to the internal asset managers.[68]

2 Repo transactions may be conducted for the purpose of controlling liquidity.

3[69] Money market investments may also be made via investment funds.

4 Short-term investments that do not meet the criteria set out in paragraph1 do not constitute liquidity; they may, however, be permitted at mandate level unless this is prohibited by other provisions of the Investment Guidelines.[70]

63 Version as per resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.
64 Version as per resolution of the Board of Directors dated 25 October 2022, in force since 25 October 2022.
65 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
66 Deleted by resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
67 Inserted by resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
68 Version as per resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.
69 Inserted by resolution of the Board of Directors dated 25 March 2021, in force since 25 March 2021.
70 Inserted by resolution of the Board of Directors dated 25 October 2022, in force since 25 October 2022.

Art. 18 Investment-grade bonds industrialised nations[71]

1 Investment-grade bonds and other such debt instruments must have a minimum rating of BBB-/Baa3 or equivalent.[72]

2 Generally, a maximum of 10 percent may be held in outstanding bonds from individual debtors.[73] No more than 20 percent of the outstanding bonds of the Swiss Confederation, Swiss cantons, cantonal banks, Swiss communes (including cities) and debtors with a guarantee from the Confederation or a canton with a long-term rating of at least A-/A3 or equivalent may be held.[74] The Investment Guidelines set the upper limits for each debtor category (market value as a percentage of total bond investments), taking account of debtor quality.[75] This limit may be exceeded by money market instruments provided the debtors have a long-term rating of at least AA-/Aa3.[76]

3 Any deviations from the limits are presented to the Investment Committee for authorisation. Additional investment restrictions are set forth in the investment management agreement.

Art. 19 Sub-investment-grade bonds

For bonds and other debt instruments with a rating below investment grade, limits are defined in the investment guidelines at portfolio level in the investment management agreement, or in the instructions for internal asset managers.

Art. 20 Bonds from emerging markets

For bonds and other debt instruments from emerging markets, limits are defined in the investment guidelines at portfolio level in the investment management agreement, or in the instructions for internal asset managers.

Art. 21 Mortgages

1 Financing is available for real estate used for residential or office premises, sales/commerce (service) as well as retirement homes and student accommodation.[77] Exceptions may be approved by the Asset Management department.

2[78]

3 In addition to the valuation of the mortgaged property, the credit quality of the debtors must be carefully assessed and reviewed at regular intervals.

Art. 22 Equities

1 Investments in shares and other equity instruments are primarily made in readily marketable securities listed on a recognised stock exchange, and replicate broad indices.[79]

2 However, investments in equities may also be made by way of investment funds.

3[80]

71 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
72 Version as per resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
73 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
74 Version as per resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
75 Version as per resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
76 Version as per resolution of the Board of Directors dated 25 March 2021, in force since 25 March 2021.
77 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
78 Deleted by resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
79 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
80 Deleted by resolution of the Board of Directors dated 25 March 2021, in force since 25 March 2021.

Art. 23 Direct property investments

1 Direct property investments may be made in Switzerland and Europe.[81]

2 The investments in Switzerland must be reasonably diversified, by geographical location, type of use and size. PUBLICA's stake in any one property must not exceed 10 percent of its direct property portfolio.[82]

2bis [83] Limits for investments in Europe are defined in the investment guidelines at portfolio level in the investment management agreements.

3 Admissible Swiss investments are defined in a separate Swiss property strategy document.[84]

4 The market value of all direct investments must be assessed yearly by an independent expert valuation using a standard and transparent method (generally the Discounted Cash Flow method).[85]

Art. 24 Indirect property investments

PUBLICA makes indirect property investments in Switzerland and abroad by participating in collective investment instruments such as investment foundations, funds and property companies.[86]

Art. 25 Alternative investments

1 Investments may be made in private debt, private equity, commodities (incl. precious metals), ILSs (insurance linked securities), foreign mortgages (private real estate debt), and infrastructure that does not wholly meet the criteria set out in Article 25a Investments in infrastructure and are therefore classified as alternative investments.[87]

2 Such investments may be made directly, via derivatives, via collective investment instruments or by way of structured products.[88]

3 Alternative investments must be carefully examined in advance with regard to the professionalism and creditworthiness of the issuers or the management, the investment strategy, the clarity of the legal situation, the redeemability and the inherent risks. The results of the examination must be recorded in writing in a memo. Limits to ensure adequate diversification at the level of the overall portfolio are defined in the investment guidelines for the mandates / collective investment instruments.[89]

Art. 25a[90] Investments in infrastructure

1 Investments may be made in infrastructure in Switzerland and abroad.

2 They may be made directly, via collective investment instruments or by way of structured products.

3 Investments in infrastructure may not lead to a leverage effect at asset class level. The use of debt capital at the level of an infrastructure company does not constitute leverage.

81 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
82 Version as per resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
83 Inserted by resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
84 Version as per resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
85 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
86 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
87 Version as per resolution of the Board of Directors dated 25 March 2021, in force since 25 March 2021; editorial correction dated 25 October 2022.
88 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
89 Version as per resolution of the Board of Directors dated 25 March 2021, in force since 25 March 2021.
90 Inserted by resolution of the Board of Directors dated 25 March 2021, in force since 25 March 2021.

4 For investments in infrastructure, limits are defined in the investment guidelines at portfolio level in the investment management agreement, in the guidelines of the collective investment instruments or in the instructions to external asset managers. PUBLICA's holding in a single infrastructure project may not exceed 1 percent of the total assets.[91]

Art. 26 Currencies

1 The Strategic Asset Allocations set forth the limits for investments in various currencies.

2 Derivative instruments may be used to remain within the limits.[92]

Art. 27 Derivatives

Derivatives may be used to mitigate investment risks or to improve the efficiency of asset management. They must be traded on a recognised stock exchange, or normally be collateralised.[93] The counterparty for derivatives without additional collateral must be a bank with a short-term rating of at least A-1/P-1 or equivalent.[94] In the case of derivatives backed by collateral, the counterparty when the transaction is concluded must be a bank with a short-term rating of at least A-2/P-2 or equivalent.[95]

Art. 28 Securities lending

1 To improve returns, securities may be lent to counterparties with a short-term rating of at least A-1/P-1 or equivalent.[96] The securities lent must be secured by means of collateral. The details of such transactions will be set forth in a securities lending agreement.

2 The rules on collective investment schemes and their implementing decrees apply, mutatis mutandis (Art. 55 para. 1 let. a CISA, Art. 76 CISO, Art. 1 et seqq. CISO-FINMA).[97]

5. Chapter: Miscellaneous

Art. 29 Exercise of voting rights for equities held

1 For Swiss equities, the voting rights are exercised.[98]

1bis [99] For equities of foreign companies, the voting rights may be exercised.[100]

2 [101]

3 The voting rights are exercised in the long-term interests of the active members and pension recipients, which are deemed to have been safeguarded when the voting behaviour serves the long-term success of the pension fund, and with a view to ensuring that the enterprise value of the company concerned is maximised over the long term.[102]

91 Version as per resolution of the Board of Directors dated 25 October 2022, in force since 25 October 2022.
92 Version as per resolution of the Board of Directors dated 22 November 2016, in force since 22 November 2016.
93 Version as per resolution of the Board of Directors dated 22 November 2012, in force since 22 November 2012.
94 Version as per resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
95 Version as per resolution of the Board of Directors dated 25 March 2021, in force since 25 March 2021.
96 Version as per resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
97 Inserted by resolution of the Board of Directors dated 25 October 2022, in force since 25 October 2022.
98 Version as per resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.
99 Inserted by resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
100 Version as per resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.
101 Deleted by resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.
102 Version as per resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.

4 The Investment Committee decides on the principles governing the exercise of voting rights in line with the Responsible Investment Policy. Asset Management ensures that voting rights are exercised in accordance with those principles.[103]

5 Voting behaviour is disclosed on the PUBLICA website.[104]

6[105]

Concluding provisions

Art. 30 Replacement of existing Investment Guidelines

1 These Investment Guidelines replace in full the PUBLICA Investment Guidelines dated 25 October 2007.

Art. 31 Entry into force

1 These Investment Guidelines enter into force on 15 April 2010.

2[106]

On behalf of the Board of Directors of PUBLICA

Chair:

Prisca Grossenbacher

Vice-Chair:

Matthias Remund

103 Version as per resolution of the Board of Directors dated 27 November 2025, in force since 27 November 2025.
104 Version as per resolution of the Board of Directors dated 18 October 2013, in force since 18 October 2013.
105 Deleted by resolution of the Board of Directors dated 8 May 2019, in force since 8 May 2019.
106 Paragraphs 2-8 deleted as of 25 March 2021 (editorial correction).