#### SUSTAINABLE FUTURE CONNECTIVITY FAM FUND

#### **SUPPLEMENT DATED 05 APRIL 2024**

This Supplement contains specific information in relation to **SUSTAINABLE FUTURE CONNECTIVITY FAM FUND** (the "Fund"), a sub-fund of **FAM SERIES UCITS ICAV** (the "ICAV"), an open-ended umbrella type Irish Collective Asset-management Vehicle with variable capital and segregated liability between sub-funds, authorised by the Central Bank on 1 August 2018 pursuant to the UCITS Regulations.

This Supplement forms part of and should be read in the context of and in conjunction with the prospectus of the ICAV dated 1 December 2022 and the Addendum thereto (together the "Prospectus").

An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.

#### **Investment Objective and Policies**

The investment objective of the Fund is to achieve long-term capital growth from a portfolio made up for at least 70% of the equity securities of companies around the world, including those in countries considered to be emerging markets, deemed to maintain environmental, social and governance ("ESG") characteristics, as described below under "ESG Integration" section.

Investments in equities will be linked to the theme of "Future Connectivity" (concerning the so called "Enablers", "Networks" and beneficiaries or "Innovators" of next generation communications as described below under "Selection of Equities") and will include, but are not limited to, companies that are involved in the roll out of cellular networks, wired networks, internet infrastructure, social media, online content production, streaming and e-commerce. E-commerce or "electronic commerce" refers to the process of buying and selling goods over the Internet conducted via a "smart" device such as a computer, tablet or smartphone, which transaction therefore occurs between buyer and seller in a virtual or online store as opposed to a physical store.

The equity securities in which the Fund will invest include but are not limited to common stock, preferred stock, rights and warrants to subscribe for the purchase of equity securities, and depositary receipts such as American, European, and Global Depository Receipts (traded on Recognised Markets). Exposure to warrants will be limited to maximum 5% of the Fund's net assets.

#### Selection of Equities

The Investment Manager will look to identify stocks that fit the following three buckets based on the identified themes in the Future Connectivity universe:

- Enablers: Typically, technology companies that provide equipment and devices that power superfast networks.
- 2. **Networks**: Typically, Telecom businesses that are owners and operators of connectivity networks.
- 3. **Innovators**: Usually internet companies taking advantage of the shift to online and mobile, to provide innovative new applications and services.

The selection process relies on the below bottom-up analysis, and it is undertaken with overarching ESG considerations being a main driver of selection of investments from the Investment Manager, as explained further below under "ESG Integration".

In respect of the bottom-up evaluation of companies the Investment Manager will take a long-term assessment of companies and will appraise company characteristics such as:

1. **Value:** to identify attractively valued stocks, the Investment Manager looks at how each stock is valued relative to the market and its peers.

- 2. Quality: Quality companies are characterized as companies with durable business models (meaning companies with stable production/manufacturing capabilities and recurring revenues) and sustainable competitive advantages. Quality companies tend to have high return of equity, stable earnings that are less correlated with the broad business cycle, and strong balance sheets with low financial leverage.
- 3. **Momentum**: Momentum companies are characterized as companies which show a continuing positive stock price trend over certain time horizons.
- 4. **Growth**: Growth companies are companies with higher-than-average growth rates in projected earnings.

#### ESG Integration

As an Art. 8 SFDR product-type, the Fund promotes, among other things, ESG characteristics, as explained below. Please also refer to the "SFDR Classification" and "SFDR Disclosure" sections below.

The Investment Manager generally considers a wide range of ESG characteristics or issues on an ongoing basis for the Fund, such as climate impact, equal opportunities, responsible product sourcing, bribery and corruption issues In addition to the above, given the Future Connectivity theme of this Fund and the type of business the investee companies will be involved in (e.g. internet), "digital ethics", as defined below, will be a particularly relevant ESG issue considered by the Investment Manager for the Fund. This means that the Investment Manager will have a sustainability focus on how the investee companies approach digital ethics, which issue that can be defined via the following six pillars:

- i. **Cybersecurity**: What measures are companies taking to protect customers from fraud/how vulnerable are they to cyberattacks, ransomware, fraud, etc?
- ii. Data governance: The extent to which businesses respect and safeguard users' personal data;
- iii. **Misinformation**: Whether or not internet sites/social media apps are being used to disseminate false or misleading information ('fake news');
- iv. Ethical Artificial Intelligence: Are companies considering or utilising an ethical framework for development and use of artificial intelligence?
- Online welfare: How seriously do internet firms take online welfare issues (cyber bullying, suicide and self-harm promotion, etc)
- vi. **Digital inclusion**: What overarching policies do businesses have to promote a trustworthy digital ecosystem that leaves no one behind?

The Investment Manager has the discretion to implement enhanced, stricter ESG characteristics and exclusions from time to time.

The Investment Manager believes that traditional fundamental analysis does not reveal all risks and therefore its equity selection process also focuses on analysing sustainability risks. These can vary depending on the types of companies under analysis, with typical ESG issues considered for each category cited below as a non-exhaustive list:

- 1. Enablers: Sustainable sourcing, clean technology, and supply chain management.
- 2. **Networks**: Environmental impact, sustainable sourcing, privacy, and supply chain.
- Innovators: Data governance, misinformation, online welfare, cybersecurity, ethical use of AI, content control, carbon footprint, equality, health & safety, ethics & culture, carbon emission and corporate governance.

ESG characteristics for the Fund are defined by reference to a combination of different measurements such as ESG ratings provided by external agencies (such as MSCI) and the Investment Manager's proprietary rating system named "Fidelity Sustainability Ratings" whose methodology criteria are available to investors on the webpage: https://fidelityinternational.com/sustainable-investing-framework/.

The exclusion screening applied by the Investment Manager includes issuers which are deemed to have failed to conduct their business in accordance with accepted international norms, including as set out in the United Nations Global Compact. The Fund is subject to the following two exclusion lists:

1. a "Firm-Wide Exclusion List", which includes, but is not limited to, cluster munitions and anti-

personnel landmines, and

2. a "Sustainable Fund Exclusion List", which includes, but is not limited to, tobacco, weapons and thermal coal.

The above exclusion lists are available to investors upon request.

Also, through the investment management process, the Investment Manager aims to ensure that investee companies follow good governance practices.

For any further information pertaining to the Investment Manager's ESG approach, the investors' attention is drawn to the following website: https://fidelityinternational.com/sustainable-investing-framework/

Moreover, the Investment Manager will comply with the Manager's exclusion list which is based on the Manager's exclusion policy and compiled by the Manager, unless the Investment Manager's exclusions result in a more stringent rule than that or those provided for by the Manager and, in such case, the Investment Manager's more stringent rule(s) will apply. The Manager's exclusion policy may be obtained on the Manager's website at: http://finecoassetmanagement.com/sustainability/. The Manager's exclusion list may be obtained upon request from the Manager by reaching out to the contact details available on its website at: http://finecoassetmanagement.com/contact/.

Direct exposure to the abovementioned investments in China, India and Russia will be achieved in the following manner:

#### Direct Investment in China, India and Russia

#### (i) Direct Investment in China

The Fund may invest up to 25% of its Net Asset Value in China A Shares and China B Shares, as defined below, in aggregate or such other shares that may in the future be defined as China A or China B shares.

#### A Shares

A Shares are securities issued by companies in China and listed on the Shanghai Stock Exchange ("SSE") and/or the Shenzhen Stock Exchange (the "SZSE") and available for investment by using the Shanghai-Hong Kong Stock Connect and the Shenzen-Hong Kong Stock Connect respectively (each a "Stock Connect" and collectively the "Stock Connects"). They are traded in Renminbi (Chinese Yuan). They can only be traded by residents of the People's Republic of China ("PRC") or under the Qualified Foreign Institutional Investor (QFII), the Renminbi Qualified Foreign Institutional Investor (RQFII) rules, or via the Stock Connects programs (the QFII and RQFII program permits certain licensed international investors to participate in the PRC's mainland stock exchanges, allowing foreign investors access the SSE and SZSE).

#### **B** Shares

B Shares are securities issued by companies in China and listed on the SSE (where they are traded in US dollars) and/or SZSE (where they are traded in Hong Kong dollars). They can be traded by non-residents of the People's Republic of China and also residents of the People's Republic of China with appropriate foreign currency dealing accounts.

The Shanghai-Hong Kong Stock Connect is a securities trading and clearing links program developed by Hong Kong Exchanges and Clearing Limited ("HKEX"), SSE and the China Securities Depositary and Clearing Corporation Limited ("ChinaClear"). It is comprised of a Northbound Shanghai Trading Link and a Southbound Hong Kong Trading Link. Under the Northbound Shanghai Trading Link, Hong Kong and overseas investors (including the Fund), through their Hong Kong brokers and a securities trading service company established by the Stock Exchange of Hong Kong (the "SEHK"), may be able to trade eligible China A Shares listed on the SSE by routing orders to the SSE. Under the Southbound Hong Kong Trading Link, investors in China may trade certain stocks listed on the SEHK.

The Shenzen-Hong Kong Stock Connect is a securities trading and clearing links program developed by HKEX, SZSE and ChinaClear. It is comprised of a Northbound Shenzhen Trading Link and a Southbound Hong Kong Trading Link. Under the Northbound Shenzhen-Trading Link, Hong Kong and overseas investors (including the Fund), through their Hong Kong brokers and a securities trading service company established by SEHK, may be able to trade eligible China A Shares listed on the

SZSE by routing orders to SZSE. Under the Southbound Hong Kong Trading Link, investors in China will be able to trade certain stocks listed on the SEHK.

There are specific risks associated with direct investment in Chinese markets and investors' attention is drawn to the section titled "Risk Factors" in the Prospectus as well as to the "Regulatory Risks Relating to the QFII and RQFII" further below.

#### (ii) Direct Investment in India

The Fund may invest up to 5% of its Net Asset Value in the abovementioned investments from issuers in India as a Foreign Portfolio Investor registered with the Securities and Exchange Board of India under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2019, as may be amended from time-to-time, and for this purpose, the Fund has registered itself as a Category I FPI. This license will allow the Fund to purchase the abovementioned investments in India. An FPI wishing to invest into India must register itself as a designated depositary participant with SEBI for the purpose of the FPI Regulations under the single window clearance mechanism and must comply with the provisions of the FPI Regulations. Depending on their risk profile, applicants for FPI registration must fall under one of two categories. The Fund will register as a Category I FPI, which is the category that applies to entities that are considered to be appropriately regulated by SEBI.

#### (iii) <u>Direct Investment in Russia</u>

The Fund may invest up to 5% of its Net Asset Value in the abovementioned investments that are listed or traded on the Moscow Exchange only.

#### Indirect Investment in China, India and Russia

In addition to the above mentioned direct exposure to investments in China, India and Russia, indirect exposure to China, India and Russia may also be achieved through investment in the abovementioned investments, which are listed or traded on one of the Recognised Markets listed in Schedule I of the Prospectus, in particular via American Depositary Receipts (ADRs) and Global Depositary Receipts (GDRs). It is not excluded, however, that such an indirect exposure may also be taken via the other equity securities listed under "Investment Objective and Policies" above in this supplement.

The Fund may hold money market instruments (such as treasury bills, certificates of deposit, commercial paper and bankers acceptances) or money market funds for ancillary purposes so that it can pay its expenses, satisfy redemption requests or take advantage of investment opportunities by freeing up cash quickly through the disposal of such money market instruments or money market funds.

No more than 10% of the Fund's Net Asset Value may be invested in units or shares of Underlying Funds within the meaning of Regulation 68(1)(e) of the UCITS Regulations and the purpose of such investment is to gain exposure to the types of investments described herein.

Other than permitted investment in unlisted securities and FDIs, the Fund's investment will be limited to securities and exchange traded FDIs that are traded on the markets listed in Schedule I of the Prospectus.

#### Benchmark Information

The Fund is actively managed. The Investment Manager has selected the MSCI ACWI Index (the "Index") that is used for performance comparison purposes only. The Manager does not intend to replicate the composition of such Index and may at all times exercise total freedom by investing in securities which are not included in the referenced Index or which are present in different proportions.

Use of Financial Derivative Instruments (FDI) and other Instruments and Techniques

The Fund may use FDI for investment purposes. The Fund may also engage in transactions with FDI for the purposes of efficient portfolio management and hedging.

The types of FDIs that the Fund may use are: options, futures, forwards and the underlying assets of FDIs will be limited to those investments that the Fund may acquire in accordance with its investment policy. The expected effect of the use of these instruments will be to enhance returns and/or reduce inherent risks affecting the Fund's investments. For information in relation to the risks associated with the use of FDIs, please refer to the "Risk Factors" section of the Prospectus.

Options: The Fund may acquire options and in particular call options may be used to gain exposure to equities and can provide an efficient, liquid and effective mechanism for taking a position in equities. Put options may be used to hedge against downside risk by permitting the Fund to sell investments at a fixed price and thereby protect the value of its portfolio in circumstances of a selloff and decline in market values.

Futures and Forwards: Futures and forwards may be bought or sold to hedge against downward movements in the value of the Fund's portfolio (i.e. the Fund may enter into futures/forwards to sell investments at a fixed price thereby establishing a floor on the price at which investments may in the future be disposed), either by reference to equity securities or markets to which the Fund may be exposed.

#### Long/Short Exposure

The expected maximum level of long derivative positions which the Fund may hold is 10% of its Net Asset Value, measured on a gross basis with the exclusion of hedging arrangements, using the sum of notionals of the derivatives held by the Fund. The expected maximum level of short derivative positions which the Fund may hold is 0% of its Net Asset Value, measured on a gross basis with the exclusion of hedging arrangements, using the sum of notionals of the derivatives held by the Fund.

Securities Lending Agreements: Securities lending is the temporary transfer of securities by a lender to a borrower, with agreement by the borrower to return equivalent securities to the lender at pre-agreed time. These agreements will only be used for efficient portfolio management to enhance overall returns to the Fund through the receipt of finance charges for the lending of its securities and are subject to the conditions and limits set out on the Central Bank UCITS Regulations. The Fund's exposure to securities lending transactions is expected to be 0-30% of the Fund's Net Asset Value, subject to a maximum exposure of 30% of the Fund's Net Asset Value.

Risk Measurement – Global Exposure and Leverage

Global exposure is calculated using the commitment approach. Global exposure and leverage as a result of FDIs, as measured using the commitment approach, shall not exceed 100% of the Fund's Net Asset Value.

#### **Investor Profile**

The Fund is suitable for retail and institutional investors seeking long-term capital growth and who are willing to accept a high level of volatility. The Fund should be viewed as a long-term investment.

#### **Investment Manager**

The Manager has appointed FIL Pensions Management of Beech Gate Millfield Lane, Lower Kingswood, Tadworth, Surrey, United Kingdom, KT20 6RP (Registered Number 2015142) to act as the investment manager pursuant to an investment management agreement, as amended and restated on 19 January 2022. The Investment Manager will provide discretionary investment management services to the Fund subject to the overall supervision of the Manager. The Investment Manager's principal business and occupation is to provide investment management services to clients.

**SFDR Classification**: The Manager has categorised the Fund as meeting the provisions set out in Article 8 of SFDR, as further described in Annex II at the end of this Supplement.<sup>1</sup>

A minimum of 70% of the Fund's net assets are invested in securities deemed to maintain sustainable characteristics.

#### **SFDR Disclosure**

When assessing the Sustainability Risk associated with the Fund's underlying investments, the Investment Manager is attempting to understand the likelihood of the risk that the value of such underlying investments could be materially negatively impacted by an environmental, social or governance event or condition (see definition of Sustainability Risk in the main body of the Prospectus)). While the Investment Manager integrates Sustainability Risk into the Fund's investment decision making process as described below, the output of such Sustainability Risk integration is not the determining factor considered in

<sup>&</sup>lt;sup>1</sup> The information contained in Annex II has been completed using information provided by the Investment Manager of the Fund.

the investment decisions of the Investment Manager in respect of the assets which the Fund may buy and/or hold. Accordingly, the Investment Manager may buy and/or hold assets which may expose the Fund to high or low levels of Sustainability Risk.

The Fund integrates Sustainability Risk into its investment decision making process as summarised below:

- (i) Prior to acquiring investments on behalf of the Fund, the Investment Manager uses Sustainability Risk metrics of a third party data service provider and/or Sustainability Risk metrics based on internal research in order to assess the relevant investment against Sustainability Risk and to identify how vulnerable the investment is to such risks; and
- (ii) The Investment Manager also applies the Manager's exclusion list (which is based on the Manager's exclusion policy and compiled by the Manager) whereby potential investments are removed from the prospective investment universe on the basis that they pose a too great Sustainability Risk.

It has been determined that the Fund may have a lower prospect of being impacted by Sustainability Risk given that the Fund falls within the meaning of Article 8 of SFDR. To the extent that a Sustainability Risk occurs, there may be a sudden, material negative impact on the value of an investment, and hence there may be a material negative impact on the Net Asset Value of the Fund. Such negative impacts may result in an entire loss of value of an investment. The Manager and the Investment Manager acknowledge that the Fund's exposure to Sustainability Risks is changeable and shall keep the Fund's exposure to these risks under periodic review. Where the Manager and/or the Investment Manager considers, as a result of such a review, that the Fund's approach to the management of Sustainability Risks is to materially change, these disclosures will be updated accordingly.

It is possible that an assessment of Sustainability Risk may influence a decision by the Investment Manager to not make an investment, or to dispose of an existing investment that would otherwise be considered as attractive to invest in or retain when confining the factors considered to financial-related elements such as financial position, revenue, capital structure etc.

#### Taxonomy Disclosure

While the Fund promotes environmental and/or social characteristics within the meaning of Article 8 of the SFDR, it should be noted that as the investments underlying this Fund do not take into account the EU criteria for environmentally sustainable economic activities within the meaning of the Taxonomy Regulation, the Fund's portfolio alignment with the Taxonomy Regulation is not calculated. It follows that the Fund does not currently commit to investing more than 0% of its assets in investments aligned with the Taxonomy Regulation. The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Please refer to the section of the Prospectus entitled "Sustainable Finance Disclosures" for further information.

Base Currency: USD

#### Offer of Shares

The following Classes of Shares, each denominated in Euro, are available for subscription:

Share Class	Initial Offer Price	Initial Offer Period	Denomination and Hedged Class		Sales Charge		Minimum Initial Subscription and Minimum Subsequent Subscription	Distribution Type
L Acc	€100	Closed	Euro	No	Yes/Up 5%	to	€ 1,000/€100	Accumulating

LH Acc	€100	Closed	Euro	Yes	Yes/ Up to 5%	€ 1,000/€100	Accumulating
A Acc	€100	Closed	Euro	No	No	€1,000/€100	Accumulating
I Acc	€100	Closed	Euro	No	No	€ 1,000,000/€100	Accumulating
K Acc	€100	2 December 2022 – 1 June 2023	Euro	No	No	€100/€100	Accumulating
KH Acc GBP	£100	2 December 2022 – 1 June 2023	GBP	Yes	No	£100/£100	Accumulating
K Acc GBP	£100	2 December 2022 – 1 June 2023	GBP	No	No	£100/£100	Accumulating
J Acc	€10000	Closed	Euro	No	No	€1,000,000/€100	Accumulating
J Dist	€10000	2 December 2022 – 1 June 2023	Euro	No	No	€1,000,000/€100	Distributing

During the initial offer period Shares are available for subscription at the initial offer price as indicated in the table above. Where the initial offer period has closed, Shares will be available at the prevailing Net Asset Value of each Class of Shares.

#### **Application for Shares**

Full details on how to purchase Shares are described in the Prospectus under the section titled "Application for Shares". Investors should note the following Dealing Deadline and Valuation Point that shall apply in respect of applications for Shares of the Fund:

"Dealing Deadline" means 11:59am (Irish time) on the relevant Dealing Day;

"Valuation Point" means 11:59pm (Irish time) on the relevant Dealing Day;

"Dealing Day" means every weekday on which retail banks and securities markets in Luxembourg and in the United Kingdom are normally open for business.

Applications for Shares may be made to the Paying Agent or the Administrator (whose details are set out in the Application Form). Applications received by the Paying Agent or the Administrator prior to the Dealing Deadline for any Dealing Day will be processed on that Dealing Day. Any applications received after the Dealing Deadline for a particular Dealing Day will be processed on the following Dealing Day, unless the Directors in their absolute discretion, in exceptional circumstances, otherwise determine to accept one or more applications received after the Dealing Deadline for processing on that Dealing Day, provided that such application(s) have been received prior to the Valuation Point for the particular Dealing Day.

#### Fees and Expenses

Fees and expenses are payable out of the Fund and details of how Fees are accrued and paid, and details of other general management and fund charges, are set out in the Prospectus under the heading "Fees and Expenses".

#### Manager's Fee

The Manager shall be entitled to a management fee of up to 2.65% per annum (plus VAT, if any) of the Net Asset Value of each Class of Shares. The fees of the Investment Manager shall be paid out of the Manager's fees and not out of the assets of the Fund.

#### Administrator's Fee

Up to 0.3% per annum (plus VAT, if any) of the Net Asset Value of each Class of Shares.

#### Depositary's Fee

Up to 0.2% per annum (plus VAT, if any) of the Net Asset Value of each Class of Shares.

#### Sales charge:

Up to 5% of the value of the gross subscription, except in respect of an Underlying Fund which is managed, directly or by delegation, by the Manager or by any other entity with which the Manager is linked by common management or control, or by a substantial direct or indirect holding; in which case, in order to avoid double-charging, either (i) the Underlying Fund will waive any sales charge, or (ii) any sales charge will be waived in respect of the Fund. In respect of scenario (ii) above, the principle of equal and fair treatment of the investors will at all times be met by the Fund in accordance with the Central Bank UCITS Regulations.

#### If a sales charge is incurred, Shareholders should view their investment as long-term.

#### Establishment Costs

The costs of establishing the Fund, obtaining approval from any authority, filing fees, the preparation and printing of this Supplement, marketing costs and the fees of all professionals relating to it, which are estimated not to exceed €25,000 will be borne by the Fund and amortised over the first five years of the Fund's operation (or such other period as may be determined by the Directors in their discretion).

#### **Risk Factors**

The attention of investors is drawn to the section headed "Risk Factors" in the Prospectus, in particular with respect to the risks pertaining to investing in emerging markets. In addition, investors should pay particular attention to the below Regulatory Risks for investments in China via the QFII and RQFII.

Regulatory Risks Relating to the QFII and RQFII

PRC investments by overseas institutions can be made by or through holders of a QFII/RQFII license, as approved under and subject to applicable Chinese regulations and regulatory requirements (the "QFII/RQFII Regulations"), which are governed by PRC authorities, including the China Securities Regulatory Commission ("CSRC"), the State Administration of Foreign Exchange ("SAFE") and the People's Bank of China ("PBOC").

The Investment Manager has been granted a QFII/RQFII license ("QFII/RQFII License") and, as such, the relevant requirements and restrictions under the QFII/RQFII Regulations apply to the Investment Manager (as the QFII/RQFII License holders) as a whole, and not simply to investments made by the Fund. Shareholders should be aware that violations of any QFII/RQFII Regulations arising from activities through the Investment Manager's QFII/RQFII status other than those conducted by the Fund could result in the revocation of, or other regulatory action in respect of, the Investment Manager's QFII/RQFII status as a whole. As a result, the ability of the Fund to make investments and/or repatriate monies through the Investment Manager's QFII/RQFII status may be affected adversely by the investments or performance by other investors utilizing the Investment Manager's QFII/RQFII status.

As the QFII/RQFII Regulations have a relatively short history and their application and interpretation remain relatively untested, there is uncertainty as to how they will be applied and interpreted by the PRC authorities or how regulators may exercise the wide discretionary powers given to them thereunder in future. Any changes to the relevant rules may have a material adverse impact on investors' investment.

Investors should further note that under the QFII/RQFII Regulations, the QFII/RQFII status could be suspended or revoked under certain circumstances where the PRC regulators have discretions. If the QFII/RQFII status is suspended or revoked, the Fund may be required to dispose of their securities held through the QFII/RQFII and may not be able to access the Chinese securities market via the QFII/RQFII, which may have an adverse effect on the Fund's performance.

#### ANNFX II

Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective. provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the

Taxonomy or not.

**Product name:** Sustainable Future Connectivity FAM Fund **Legal entity identifier:** 254900RJHZPU7LT4ZQ41

### Environmental and/or social characteristics

DOE	s this financial product have a sust	ainable investment objective?
• •	Yes	• No
	It will make a minimum of sustainable investments with an environmental objective:%  in economic activities that qualify as environmentally sustainable under the EU Taxonomy  in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5% of sustainable investments  with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy  with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy  with a social objective
	It will make a minimum of sustainable investments with a social objective:%	It promotes E/S characteristics, but will not make any sustainable investments

## What environmental and/or social characteristics are promoted by this financial product?

The Fund promotes environmental and social characteristics by investing in securities of issuers with favourable ESG characteristics. Favourable ESG characteristics are determined by reference to ESG ratings.

The Fund invests in the equity securities of companies throughout the world, that are linked to the theme of future connectivity (the enablers, networks and beneficiaries of next generation communications). Investments may be made in companies that are involved in the roll out of cellular networks, wired networks, internet infrastructure and online content production. The Fund partially intends to make sustainable investments. No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted.

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

The Fund uses the following sustainability indicators in order to measure the attainment of the environmental or social characteristics that it promotes:

- i) the percentage of the Fund invested in securities of issuers with favourable ESG characteristics in accordance with Fidelity's Sustainable Investing Framework;
- ii) the percentage of the Fund invested in securities of issuers with exposure to the Exclusions (as defined below);
- iii) the percentage of the Fund invested in sustainable investments.
- What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The Fund determines a sustainable investment as follows:

- (a) issuers that undertake economic activities that contribute to one or more of the environmental objectives set out in the EU Taxonomy and qualify as environmentally sustainable in accordance with EU Taxonomy; or
- (b) issuers whereby the majority of their business activities (more than 50% of revenue) contribute to environmental or social objectives aligned with one or more of the United Nations Sustainable Development Goals ("SDGs"); or
- (c) issuers which have set a decarbonisation target consistent with a 1.5 degree warming scenario or lower (verified by the Science Based Target Initiative or a Fidelity Proprietary Climate Rating) which would be considered to contribute to environmental objectives;

provided they do no significant harm, meet minimum safeguards and good governance criteria.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Sustainable investments are screened for involvement in activities that cause significant harm and controversies, assessed through a check that the issuer meets minimum safeguards and standards that relate to principal adverse indicators (PAIs) as well as performance on PAI metrics. This includes:

Norms-based screens - the screening out of securities identified under Fidelity's existing norms-based screens (as set out below);

Activity-based screens - the screening out of issuers based on their participation in activities with significant negative impacts on society or the environment, including

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

issuers that are considered to have a 'Very Severe' controversy using controversy screens, covering 1) environmental issues, 2) human rights and communities, 3) labour rights and supply chain, 4) customers, 5) governance; and

PAI indicators: quantitative data (where available) on PAI indicators is used to evaluate whether an issuer is involved in activities that cause significant harm to any environmental or social objective.

— How have the indicators for adverse impacts on sustainability factors been taken into account?

For sustainable investments, as set out above, Fidelity undertakes a quantitative evaluation to identify issuers with challenging performance on PAI indicators. Issuers with a low score will be ineligible to be 'sustainable investments' unless Fidelity's fundamental research determines that the issuer is not breaching "do no significant harm" requirements, or is on the path to mitigate the adverse impacts through effective management or transition.

— How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Norms-based screens are applied: Issuers identified as failing to behave in a way which meets their fundamental responsibilities in the areas of human rights, labour, environmental and anti-corruption as aligned with international norms including those set out by the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, UN Global Compact (UNGC), ILO Standards International Labour Organisation (ILO) Conventions, are not considered sustainable investments.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anticorruption and antibribery matters.



#### Does this financial product consider principal adverse impacts on sustainability factors?

¥ Yes,

Principal adverse impacts on sustainability factors are considered through and incorporated into investment decisions through a variety of tools, including:

- (i) Due Diligence analysis of whether principle adverse impacts are material and negative.
- (ii) ESG rating Fidelity references ESG ratings which incorporate material principal adverse impacts such as carbon emissions, employee safety and bribery and corruption, water management. For sovereign issued securities, principal adverse impacts are considered through and incorporated into investment decisions using ratings which incorporate material principal adverse impacts such as carbon emissions, social violations and freedom of expression.
- (iii) Exclusions When investing directly in corporate issuers, the Fund applies the Exclusions (as defined below) to help mitigate PAI through excluding harmful sectors and prohibiting investment in issuers that breach international standards, such as the UNGC.
- (iv) Engagement Fidelity uses engagement as a tool to better understand principal adverse impacts on sustainability factors and, in some circumstances, advocate for enhancing principal adverse impacts and sustainability metrics. Fidelity participates in relevant individual and collaborative engagements that target a number of principal adverse impacts (i.e. Climate Action 100+, Investors Against Slavery and Trafficking APAC).
- (v) Voting Fidelity's voting policy includes explicit minimum standards for board gender diversity and engagement with climate change. Fidelity may also vote to enhance issuer performance on other indicators.
- (vi) Quarterly reviews monitoring of principal adverse impacts through the Fund's quarterly review process.

The specific PAI indicators that are taken into consideration are subject to data availability and may evolve with improving data quality and availability. In certain circumstances, such as indirect investments made by the Fund, PAI may not be considered.

No



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

#### What investment strategy does this financial product follow?

The investment objective of the Fund is to achieve long-term capital growth from a portfolio made up for at least 70% of the equity securities of companies around the world, including those in countries considered to be emerging markets, deemed to maintain environmental, social and governance ("ESG") characteristics, as described below under "ESG Integration" section.

Investments in equities will be linked to the theme of "Future Connectivity" (concerning the so called "Enablers", "Networks" and beneficiaries or "Innovators" of next generation communications as described below under "Selection of Equities") and will include, but are not limited to, companies that are involved in the roll out of cellular networks, wired networks, internet infrastructure, social media, online content production, streaming and e-commerce. E-commerce or "electronic commerce" refers to the process of buying and selling goods over the Internet conducted via a "smart" device such as a computer, tablet or smartphone, which transaction therefore occurs between buyer and seller in a virtual or online store as opposed to a physical store.

The equity securities in which the portfolio will invest include but are not limited to common stock, preferred stock, rights and warrants to subscribe for the purchase of equity securities, and depositary receipts such as American, European, and Global Depository Receipts (traded on Recognised Markets). Exposure to warrants will be limited to maximum 5% of the Fund's net assets.

In respect of its direct investments, the Fund is subject to:

- 1) Firm-wide exclusions list, which includes cluster munitions and anti-personnel landmines, and
- 2) a "Sustainable Fund Exclusion List", which includes, but is not limited to, tobacco, weapons and thermal coal and
- 3) a principle-based screening policy which includes:
  - a) norms-based screening of issuers which the investment manager considers have failed to conduct their business in accordance with international norms, including as set out in the UNGC; and
  - b) negative screening of certain sectors, issuers or practices based on specific ESG criteria where revenue thresholds may be applied.
- 4) Fineco Asset Management DAC Investment Exclusion Policy effective on 27 July 2022.

The above exclusions and screens (the "Exclusions") may be updated from time to time. Please refer to the website for further information on the Sustainable investing framework (fidelityinternational.com) and further details on the Exclusion Policy can be found on the Management Company's website at the following link <u>FAM - Sustainability |</u> Fineco FAM - Fineco FAM (finecoassetmanagement.com)

The investment manager also has discretion to implement enhanced, stricter sustainable requirements and exclusions from time to time.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Mandate will invest:

- (i) a minimum of 70% of its assets in issuers with favourable ESG characteristics,
- (ii) a minimum of 5% in sustainable investments of which a minimum of 0% have an environmental objective (which is aligned with the EU Taxonomy), a minimum of 0% have an environmental objective (which is not aligned with the EU Taxonomy) and a minimum of 0% have a social objective.

In addition, the Fund will systematically apply the Exclusions as described above.

compiled by the Manager will apply. Exclusion categories considered in the exclusion policy are United Nations Global Compact Principles, Controversial Weapons, Tobacco, Climate Change and Forced Labour. See link above to the Manager's website for more detail on the application of the exclusion policy.

The Manager's exclusion list which is based on the Manager's exclusion policy and

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

When selecting investments, the Fund's investment universe will be reduced by at least 20% due to the exclusion of issuers on the basis of their ESG characteristics.

What is the policy to assess good governance practices of the investee companies?

The governance practices of issuers are assessed using fundamental research, including Fidelity ESG ratings, data regarding controversies and UN Global Compact violations.

Key points that are analysed include track record of capital allocation, financial transparency, related party transactions, board independence and size, executive pay, auditors and internal oversight, minority shareholder rights, among other indicators.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

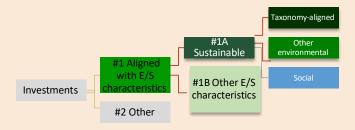


# Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- turnover
   reflecting the
   share of revenue
   from green
   activities of
   investee
   companies
- capital
   expenditure
   (CapEx) showing
   the green
   investments made
   by investee
   companies, e.g. for
   a transition to a
   green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.

#### What is the asset allocation planned for this financial product?



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

**#20ther** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

(#1 aligned with E/S characteristics) The Fund aims to invest:

- (i) A minimum of 70% of its assets in securities of issuers with favourable ESG characteristics,
- (ii) A minimum of 5% in sustainable investments (#1A sustainable)\* of which a minimum of 0% have an environmental objective (which is aligned with the EU Taxonomy), a minimum of 0% have an environmental objective (which is not aligned with the EU Taxonomy) and a minimum of 0% have a social objective.

\*Fidelity determines the minimum overall percentage of sustainable investments on the basis of including issuers, as described above, whereby more than 50% of revenue contributes to a sustainable investment objective.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Where the security underlying a derivative has favourable ESG characteristics in accordance with Fidelity's Sustainable Investing Framework, the derivative may be included in determining the proportion of the Fund dedicated to promotion of environmental or social characteristics.



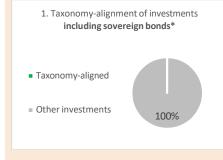
To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

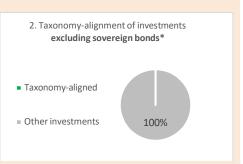
The Fund invests a minimum of 0% in sustainable investments with an environmental objective aligned with the EU Taxonomy.

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

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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





- \* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures
- What is the minimum share of investments in transitional and enabling activities?

The Fund invests a minimum of 0% in transitional activities and a minimum of 0% in enabling activities.



What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The Fund invests a minimum of 0% in sustainable investments with an environmental objective that is not aligned with the EU Taxonomy



What is the minimum share of socially sustainable investments?

The Fund invests a minimum of 0% in sustainable investments with a social objective



What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

The remaining investments of the Fund may be invested in securities of issuers that are able to demonstrate that they are on an improving trajectory with respect to their ESG characteristics, as well as cash and cash equivalents for liquidity purposes and derivatives which may be used for investment and efficient portfolio management.

As a minimum environmental and social safeguard, the Fund will adhere to the Exclusions.

are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote. Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

An index has not been designated as a reference benchmark to determine whether this financial product is aligned with the environmental or social characteristics that it promotes.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

This question is not applicable.

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

This question is not applicable.

- How does the designated index differ from a relevant broad market index?
  This question is not applicable.
- Where can the methodology used for the calculation of the designated index be found?

This question is not applicable.



Where can I find more product specific information online?

More product-specific information can be found on the website:

Further details on the Responsible Investment Policy, summary investment process and Exclusion Policy can be found on the Management Company's website at the following link FAM - Sustainability | Fineco FAM - Fineco FAM (finecoassetmanagement.com)