#### FINECO AM INVESTMENT GRADE EURO AGGREGATE BOND FUND

#### **SUPPLEMENT DATED 1 DECEMBER 2022**

This Supplement contains specific information in relation to **FINECO AM INVESTMENT GRADE EURO AGGREGATE BOND 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").

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

The investment objective of the Fund is to achieve total returns, meaning capital appreciation plus income from its investments, through investment in bonds.

The Fund seeks to achieve its investment objective while promoting environmental and/or social characteristics under Article 8 of SFDR as described under "ESG Integration" below. The Fund does not pursue a sustainable objective and thus it is not classified under Article 9 of SFDR.

The Fund invests at least two-thirds of its Net Asset Value in fixed or floating rate bonds issued by governments or corporate entities domiciled in the European Union whose long-term credit rating is at least Investment Grade.

The Fund may invest up to 15% of its Net Asset Value in bonds rated below Investment Grade provided that such bonds are not rated below B-/B3. Bonds that are not rated by Standard & Poors, Moody's or Fitch, are required to be of comparable credit quality as determined by the Manager based on its bottom-up credit analysis of issuers described below.

The Manager will use a top-down and bottom-up investment strategy to select and manage investments. The top-down component of this strategy consists of allocating investments based on the global investment outlook and considering the macroeconomic environment, including the likely path of growth, inflation and interest rates. The result of this analysis helps to inform the Manager's view regarding the Fund's sensitivity to interest rate movements and the impact of such movements on the various types of bonds. The bottom-up component of this investment strategy involves the Manager's credit analysts assessing each individual bond and the bond markets to assess the probability of losses being accrued, the bond issuers defaulting on the payment of interest and the performance outlook for the bonds under assessment. Following such credit assessment, the Manager appraises a potential investment in a bond in terms of relative value when compared to other bonds that could be invested in. In this regard, the Manager focuses on relative price, liquidity and risk premium for the purposes of determining which bonds to acquire on behalf of the Fund. ESG integration will also be a key consideration in assessing the merits of any investment and will be integrated into the process as a core part of understanding the risk profile of any investment. When an investment in a bond is made, it will be closely monitored by the Manager taking into account the credit analysis outlined above, and the investment rationale for retaining the investment in such bond will be kept under review by the Manager.

The Fund may also invest in the following:

(i) up to one-third of its Net Asset Value in money market instruments such as certificates of deposit, commercial paper, treasury bills, or bankers' acceptances;

- (ii) up to 25% of its Net Asset Value in convertible bonds (bonds that can be converted to the equity of the issuing company) or bonds with warrants attached (bonds that give for the option to buy equities of the issuing company). Convertible bonds and warrants may embed options and therefore leverage which is not expected to be material;
- (iii) up to 20% of its Net Asset Value in contingent convertible bonds that may be converted into the equity of the issuer, which the Manager considers offer an attractive investment opportunity due to relatively high coupon payments and exposure to the bank and financial sector. The principal risks of investing in contingent convertible bonds are described in the section entitled "Risk Factors" below;
- (iv) up to 20% of its Net Asset Value in asset-backed securities, which may embed leverage and which may include, but not be limited to, mortgage-backed securities;
- (v) up to 20% of its Net Asset Value in ancillary liquid assets such as cash deposits or bills of exchange.

The Fund may invest in financial derivative instruments for investment, efficient portfolio management and hedging purposes as further described in the section titled "Use of Financial Derivative Instruments (FDI)" below. The Fund may enter into currency forwards for hedging purposes or for investment purposes. In particular the Manager may seek to enhance investment returns by altering the currency exposure of the Fund's assets in circumstances where, based on the Manager's outlook for currency markets and its assessment of the relevant factors that determine the value of its markets as further described in the section headed "Currency Forwards" below, the Manager anticipates changes in currency values.

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.

Investment in equity securities is not permitted, other than where acquired through converting and corporate actions of bonds held by the Fund.

The performance of the Fund's portfolio of investments will be measured against the Bloomberg Euro Aggregate Bond Index ("Index"). The Index measures the performance of Euro denominated bonds across treasury, corporate, government-related and securitised sectors. The Manager is entitled at any time to change the Index where, for reasons outside the Manager's control, the Index has been replaced by another index or where another index may reasonably be considered by the Manager to have become the industry standard for the relevant exposure. Shareholders will be advised of any change in the Index in the next annual or half-yearly report of the Fund.

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

#### Benchmark Information

From time to time, the Manager, considering the degree of representativeness of underlying markets and their liquidity, strategically selects a benchmark or index (the "Index") appropriate to the Fund's investment policies, in reference to which the Fund is then managed and compared to which the Fund will seek to achieve a similar rate of return, gross of fees. Currently, the Fund is actively managed in reference to the Bloomberg Euro Aggregate Bond Index. 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.

"Bloomberg®" and the above Index are service marks of Bloomberg Finance L.P. and its affiliates, including Bloomberg Index Services Limited ("BISL"), the administrator of the Index (collectively, "Bloomberg"), and have been licensed for use for certain purposes by the ICAV. Bloomberg is not

affiliated with the ICAV, and Bloomberg does not approve, endorse, review, or recommend the Fund. Bloomberg does not guarantee the timeliness, accurateness, or completeness of any data or information relating to the Fund.

#### ESG Integration

The Fund seeks to promote ESG characteristics through the active incorporation of ESG factors and considerations into the investment decision making framework, and portfolio analysis and monitoring activities, using inputs from internal and external data sources.

#### ESG Screenings

**Exclusion screenings**: In the process of selection of the permitted instruments, the Manager's exclusion policy will apply.

The Manager's exclusion policy may be obtained on the Manager's website at: <a href="http://finecoassetmanagement.com/sustainability/">http://finecoassetmanagement.com/sustainability/</a>. The Manager's exclusion list which is derived from the exclusion policy may be obtained upon request from the Manager by reaching out to the contact details available on its website at: <a href="http://finecoassetmanagement.com/contact/">http://finecoassetmanagement.com/contact/</a>.

**ESG** Assessment: The Manager selects those securities for the Fund that show sound fundamentals and high ESG scores, while being valued at a discount to the Manager's assessment of intrinsic value.

When considering ESG scores, the Manager has regard to ESG scores assigned by a third party data provider. Further information on ESG scores is available on the Manager's website at the link: http://finecoassetmanagement.com/sustainability/

The due diligence includes an analysis on ESG risks material to the investee issuers and considers how those entities manage their sustainability risks.

**Data Reliance**: The Manager will (i) source data from third-party data providers such as MSCI Inc and Bloomberg, and will apply its discretion on the conclusions of the data providers, and/or (ii) carry out its own internal ESG analyses on issuers. Potential investments for which there is insufficient data available from third party providers to conduct an ESG analysis, may be deemed not eligible for inclusion in the Fund's investment universe subject to the Manager's own internal ESG analysis and assessment of an issuer which may include engagement with the relevant issuer to understand their approach to ESG matters.

#### ESG factors

The list of ESG factors considered by the Manager for each investment will differ according to the sector, industry and business activity the issuer is engaged in. Examples of ESG factors considered by the Manager are:

Environmental Issues	Social Issue	Corporate Governances Issues
Air pollution	Workplace safety	Audit committee independence
Waste & Hazardous Materials Management	Working conditions	Compensation committee independence
Water pollution	Employee health	Political contribution

Resource efficiency / management	Social value creation	Executive compensation
Biodiversity / habitat protection	Child labour ban	Stakeholder engagement
Material Sourcing & Efficiency/ management	Emergency preparedness	Code of conduct

#### Responsible Investing Information

For any additional information on the Manager's sustainable investing approach, please refer to the Manager's website at the following link: https://finecoassetmanagement.com/sustainability/

#### Use of Financial Derivative instruments (FDI)

The Fund may engage in transactions in FDIs for investment purposes to generate returns and for the purposes of efficient portfolio management. The types of FDIs that the Fund may use are: foreign exchange forward contracts, futures (including bonds futures and interest rate futures), options (on bonds, interest rates and currencies), swaps (including interest rate swaps, inflation swaps, credit default swaps and currency swaps), money markets derivatives (including interest rate futures, forward rate agreements, short- dated interest rate swaps and overnight interest rate swaps) and the underlying assets of FDIs will be limited to those investments that the Fund may acquire in accordance with its investment policy.

Currency Forwards: Currency forwards may be used for the purpose of hedging or managing currency exposure, arising for instance from the redenomination of an asset designated in a currency other than the Fund's Base Currency. Currency forwards can also be used for taking active currency risk where the Manager takes long or short exposure to currencies that it expects to rise or fall in value as the case may be, as determined based on an assessment of the relevant factors that determine the value of currency markets such as global economic conditions, interest rates, capital flows and credit spreads (i.e. difference in yield between bonds of similar maturities). The Fund's exposure to long currency forward positions will be up to 25% of the Fund's Net Asset Value and its exposure to short currency positions will be up to 25% of the Fund's Net Asset Value.

Futures and Forwards: Futures and forwards may be acquired 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 individual bonds or markets to which the Fund may be exposed, or for investment purposes. Forwards or futures contracts on individual bonds, bond indices, foreign exchange or interest rates may also be used for the purpose of taking or increasing the Fund's exposure to such instruments for investment purposes either on a temporary or long-term basis where such investment is consistent with Fund's investment policy.

Options: The Fund may acquire options and in particular call options may be used to gain exposure to individual bonds, bond futures, money market instruments and bond indices that the Fund may acquire in accordance with its investment policy and can provide an efficient, liquid and effective mechanism for taking a position in securities. Put options may be used to reduce exposure to bond markets or 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 sell-off and decline in market values. Currency options may also be used by the Fund to hedge currency risks and for investment purposes.

*Interest Rate Swaps:* The Fund will use interest rate swaps and inflation swaps to gain exposure to changes in relevant rates or to hedge against changes in relevant rates.

Credit Default Swaps: The Fund may use credit default swaps as a substitute for purchasing bonds or for the purposes of hedging exposure to bonds and reducing the credit risk in respect of investments. The Fund may either buy or sell credit protection under credit default swaps. The Fund expects to use credit default swaps for long exposure to bonds or bond indices and may also take synthetic short positions on bonds or bond indices, either as a hedge against a long position or for investment purposes.

Money Market Derivatives: Money market derivatives are short-term interest rate derivatives that are used in money market trading and hedging. The types of money market derivatives are limited to interest rate futures contracts, forward rate agreements (FRAs), short-dated interest rate swaps and overnight interest rate swaps. The Fund intends to make regular use of short dated interest rate contracts such as CME Eurodollars, CME Fed Funds, LIFFE Euribor and LIFFE Short Sterling for the purposes of gaining exposure to changes in interest rates or to hedge exposure to changes in interest rates.

Exposure to Indices: The Fund may take exposure to indices through the use of options and credit default swaps as outlined above. The exposure to indices, if any, will comply with the conditions and limits set down in the Central Bank's guidance entitled "UCITS Financial Indices". When an index does not comply with the diversification requirements established by the UCITS Regulations, the Fund will apply a "look-through" approach which allows the Manager to analyse the Fund's exposure to the Index by looking through the derivative position which gives the Fund the relevant indirect exposure to the underlying indices. This allows the Fund to ensure that it meets the risk spreading requirements of the UCITS Regulations. Following this "look through" analysis, if the Fund's consolidated exposure does not meet the risk spreading requirements of the UCITS Regulations, the Fund will have to address this by reducing said exposure. It is not possible to identify the specific indices that the Fund will take exposure to (which may change from time to time), however, the underlying assets of such indices will be the abovementioned asset classes that the Fund may acquire in accordance with its investment policy. The Manager will not use indices that rebalance more frequently than monthly, such rebalancing is not expected to have a material effect on the costs incurred within the index. The indices, if any, that the Fund takes exposure to will be included in the financial statements of the ICAV and details of the indices, including details of websites where additional information can be obtained, will be available upon request from the Manager.

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 preagreed 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 by the Fund of securities that it may acquire in accordance with its investment policy and are subject to the conditions and limits set out in the Central Bank UCITS Regulations. The Fund will only act as a lender under securities lending transactions and exposure to securities lending transactions is expected to be 5% of the Fund's Net Asset Value, subject to a maximum exposure of 30% of the Fund's Net Asset Value.

#### Long/Short Exposure

The Fund will not directly short bonds or directly short any of its investments, however, the Fund may as part of its investment strategy hold short positions through FDI. Short positions will be selected based on the Manager's assessment of the credit risk of underlying bonds (as determined by applying the Manager's credit assessment focusing on both top-down and bottom-up analysis of investments as described in the Fund's investment policy) and will be used to hedge against or take advantage of price movements of bonds or bond markets generally.

The expected maximum level of long derivative positions which the Fund may hold is 2900% of its Net Asset Value, measured on a gross basis 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 3000% of its Net Asset Value, measured on a gross basis using the sum of notionals of the

derivatives held by the Fund. The Fund intends to makes regular use of money market derivatives as described above which require substantial notional leverage to generate a limited amount of risk due to their short duration and therefore using the "sum of-the-notionals" methodology will result in generating high levels of leverage at times when these types of instruments are in use.

#### Risk Measurement - Global Exposure and Leverage

Market risk created through the use of derivatives will be measured daily using the relative value-at-risk (VaR) approach. VaR is a risk measurement technique designed to estimate the potential loss in the Fund's portfolio over a set period at a certain confidence level, and based on statistical analysis of historical price trends and volatilities. The VaR of the Fund's portfolio is measured relative to the Bloomberg Euro Aggregate Bond Index, a benchmark which the Manager considers is a comparable benchmark to the Fund's portfolio. The Bloomberg Euro Aggregate Bond Index is a broad-based benchmark that measures the investment grade, Euro-denominated, fixed-rate bond market, including treasuries, government-related, corporate and securitized issues. In compliance with the UCITS Regulations, the relative VaR of the Fund's portfolio shall not exceed twice the VaR of the Bloomberg Euro Aggregate Bond Index, as determined daily using a one- tailed confidence interval of 99%, a holding period of one month and a historical observation period of at least 1 year.

The level of gross leverage, calculated based on the sum of the absolute value of notionals of the derivatives used, in accordance with the requirements of the Central Bank, is expected to be 6000% of the Fund's Net Asset Value. There is a possibility of higher leverage levels than this expected level. The expected level of leverage is calculated based on the sum of the absolute value of notionals of the derivatives used, does not take into account any netting and hedging arrangements and therefore is not a risk-adjusted method of measuring leverage.

**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.

#### **SFDR Disclosure**

When assessing the Sustainability Risk associated with the Fund's underlying investments, the 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.

The Fund integrates Sustainability Risk into its investment decision making process as summarised above under "ESG Integration".

While the Manager integrates Sustainability Risk into the Fund's investment decision making process, the output of such Sustainability Risk integration is not the determining factor considered in the investment decisions of the Manager in respect of the assets which the Fund may buy and/or hold. Accordingly, the Manager may buy and/or hold assets which may expose the Fund to high or low levels of Sustainability Risk.

The Manager has 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 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 impact may result in an entire loss of value of the relevant investment(s). The Manager acknowledges 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 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 such an assessment of Sustainability Risks may influence a decision by the Manager not to make an investment or 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.

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

Base Currency: Euro.

#### **Investor Profile**

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

#### Offer of Shares

The following Classes of Shares are available for subscription:

Share Class	Initial Offer Price	Initial Offer Period		cy iination Hedged	Sales Charge	Manager Fee	's	Minimum Initial Subscription and Minimum Subsequent Subscription	Distribution Type
Class I Acc	€100	Closed	Euro	No	No	Yes/up 0.7%	to	€1,000,000 / €100	Accumulating
Class D Acc*	€100	2 December 2022 – 1 June 2023	Euro	No	No	Yes/up 0.7%	to	€500 /€100	Accumulating
Class J Acc	€10,000	2 December 2022 – 1 June 2023	Euro	No	No	Yes/up 0.7%	to	€1,000,000 / €100	Accumulating
Class A Acc	€100	2 December 2022 – 1 June 2023	Euro	No	No	Yes/up 1.5%	to	€1,000 / €100	Accumulating
Class L Acc	€100	2 December 2022 – 1 June 2023	Euro	No	Yes/up to 3%	Yes/up 1.5%	to	€1,000 / €100	Accumulating
Class L Dist	€100	2 December 2022 – 1 June 2023	Euro	No	Yes/up to 3%	Yes/up 1.5%	to	€1,000 / €100	Distributing

<sup>\*</sup>Class D Shares in the Fund shall only be made available for subscription to such entities or persons as the Manager may determine from time to time in its absolute discretion.

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 shall apply in respect of applications for Shares of the Fund:

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

"Valuation Point" means 4:00 pm (Irish time) on the relevant Dealing Day.

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**

The following fees and expenses are payable out of the assets of the Fund. Details of how the fees and expenses are accrued and paid, and also 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 either 0.7% or 1.5% (as applicable) per annum (plus VAT, if any) of the Net Asset Value of the classes of Shares. Further details are set out in the table above.

#### 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 3% 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 medium to long-term.

#### **Risk Factors**

The attention of investors is drawn to the section headed "Risk Factors" in the Prospectus.

In addition, investors should note the risks of investing in contingent convertible bonds ("CoCos"). CoCos are debt instruments issued by European financial institutions which have loss absorbing features and may convert to equity when a predetermined trigger is met, such as when the issuer's capital adequacy falls. The existence of these trigger events creates a different type of risk from

traditional bonds and can result in a partial or total loss of value or alternatively they may be converted into shares of the issuer which may also have suffered a loss in value. Investing in CoCos carry the following (non-exhaustive) list of risks:

<u>Trigger level risk</u>: Each Coco has its own characteristics and the trigger levels upon which a CoCo is written down or converts to equity may be different for each instrument. Investors in CoCos bear the risk of loss of value due to a loss of capital of the issuer, which may result to the conversion of the CoCo to equity or write down of the value of the CoCo.

Resolution powers: Resolution powers written into statutory law provide resolution or supervisory authorities with powers to ensure that CoCos absorb losses if the issuer is deemed to be non-viable. The point of non- viability is defined as the point at which the resolution authority determines that (i) the institution is failing or likely to fail (ii) there is no reasonable prospect that a private action would prevent the failure and (iii) a resolution action is necessary in the public interest. The point of non-viability may be deemed by the relevant authority to be before the level at which a trigger has been reached.

<u>Coupon cancellation risk</u>: Coupon payments on certain types of CoCo are entirely discretionary and may be cancelled by the issuer at any point, for any reason, and for any length of time.

<u>Capital structure inversion risk</u>: CoCo investors may suffer a loss of capital when equity holders do not. In certain scenarios, holders of CoCos will suffer losses ahead of equity holders, e.g., when a high trigger principal write-down CoCo is activated.

<u>Call extension risk</u>: As CoCos may be issued as perpetual instruments and investors may not be able to recover their capital on the optional reimbursement dates provided for in the terms of issue.

<u>Unknown risk</u>: CoCos are relatively new instruments and their behaviour during a period of stressed market conditions may be highly unpredictable. In a stressed environment, if an issuer or issuers suspend coupon payments or convert the instruments to equity there is a risk that investors consider this issue to be systemic, which could have a contagious impact on the market.

<u>Yield/Valuation risk</u>: CoCos often provide attractive yield and tend to compare favourably from a yield standpoint when compared to more highly rated debt issues of the same issuer. However, there is a risk that investors may not have fully understood the risk of conversion of these instruments to equity or the risk of cancellation of their coupon payments.

<u>Conversion risk</u>: It might be difficult to assess how CoCos will behave upon conversion. In the case of conversion into equity, the Fund might be forced to sell these new equity shares at a discount to their normal market value.

<u>Liquidity risk</u>: In the circumstances of the conversion of CoCos or if coupon payments are cancelled, this may affect the liquidity of these instruments and sellers of CoCos may have to accept a significant discount to the expected value of the CoCo in order to sell the instrument.

Write-down risk: Should a CoCo undergo a write-down, the Fund may lose some or all of the original investment in the CoCo.

<u>Subordinated instruments</u>: CoCos are subordinated instruments and rank junior in priority of payment to the claims of all senior creditors and certain subordinated creditors of the issuer.

#### ANNEX 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

investment means an investment in an economic activity

Sustainable

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: FINECO AM INVESTMENT GRADE EURO AGGREGATE BOND FUND Legal entity identifier: 635400DX4FYP7WIXXR06

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?				
••	Yes	••	<b>★</b> 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 _% 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 environmental and/or social characteristics promoted by the Fund include:

indicators measure **Positive Screening**: Consideration of ESG factors are a key element of portfolio construction. how the The Manager will determine how such companies integrate E&S characteristics by analysing environmental or Environmental and/or Social ratings attributed to such companies with the exclusion of Environmental and/or Social "laggards" from the Fund's investment portfolio. By incorporating positive Environmental and/or Social factors as part of the overall portfolio construction process, the Fund through its investments supports a tilt towards investment in attained. issuers that have a more positive impact on the environment or society at large.

social characteristics promoted by the financial product are

Sustainability

2. Fund Level ESG Scoring: A minimum ESG scoring threshold is applied at Fund Level to ensure that the Fund portfolio does not fall below a level deemed by the Manager to be appropriate for a fund promoting environmental and social characteristics. This additional control serves to highlight a minimum Fund level ESG score and promotes engagement and challenge of portfolio managers on selecting more positive issuers demonstrating better Environmental and/or Social Characteristics..

#### 3. Negative Screening (Norm-based exclusions)

For direct holdings the Manager (see link to Exclusion Policy for more information) applies norms-based exclusions. The Manager wants its funds under management to avoid making any investments which the Manager or its clients might deem incompatible with minimum responsible investing principles. To align the Fund's investments with this approach, the Manager has adopted a firm wide exclusion policy which screens all investments for their compliance with minimum international standards and norms, from which an Exclusion List is derived.

Exclusion categories considered in the Exclusion Policy are:

- United Nations Global Compact Principles
- Controversial Weapons
- o Tobacco
- o Climate Change
- Forced Labour

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 (please note that reference to ESG scores means ESG score data received from third party data provider/s):

- i) The minimum Fund level ESG score;
- ii) The percentage of the Fund's portfolio rated above BB by MSCI ESG Manager (or an other corresponding rating from a similar rating provider) and;
- iii) The percentage of the Fund investment universe subject to the Manager's exclusion policy.
- 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?
  - N/A
- 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?
  - N/A
  - How have the indicators for adverse impacts on sustainability factors been taken into account?

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.

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

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.



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

Yes, principal adverse impacts are considered on an ongoing basis by monitoring the Fund portfolio against mandatory and additional PAI indicators. Information on how the principal adverse impacts were taken into account will be provided in the Fund's annual report. The PAI indicators that are taken into consideration are subject to data availability and may evolve with improving data quality and availability.



No

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

The investment objective of the Fund is to achieve total returns, meaning capital appreciation plus income from its investments, through investment in bonds.

The Fund invests at least two-thirds of its Net Asset Value in fixed or floating rate bonds issued by governments or corporate entities domiciled in the European Union whose long-term credit rating is at least Investment Grade.

The Manager systematically includes ESG analysis in its investment decision making process by relying on certain ESG screenings, practices and factors, which are summarised as follows and that can also be found in more detail on the Manager's website at the following link: <a href="https://finecoassetmanagement.com/sustainability/">https://finecoassetmanagement.com/sustainability/</a>;

ESG Screenings

1. **Exclusion screenings**: in the process of selection of the permitted instruments, the Manager - in accordance with its exclusion policy (the "Exclusion Policy"), may identify issuers that are allegedly involved in breaches of international norms on, for example, environmental protection, human rights, labour standards and anti-corruption. If an issuer is identified in this screening process, action is taken by the Manager that may lead to the exclusion of such entity from the investment universe of the Fund.

The exclusions specifically covered by the Manager's Exclusion Policy currently include:

- a. Issuers that breach the principles of the United Nations Global Compact (UNGC);
- Issuers involved in the manufacture or product life cycle of controversial weapons (such as but not limited to chemical weapons, cluster munitions and landmines);
- Issuers deriving a certain percentage of their revenue from the production of tobacco or from other type of involvement in the life cycle of tobacco products such as distribution or licencing activities;
- d. Issuers that derive a certain percentage of their revenue from thermal coal extraction and/or arctic drilling;
- e. Issuers that contravene the UNGC labour-related principles and International Labour Organisation's ("ILO") broader set of labour standards.
- 2. **ESG Assessment**: the Manager selects those securities for the Fund that show sound fundamentals and higher ESG scores, while being valued at a discount to the Manager's assessment of intrinsic value.

The elements of the investment strategy to attain the environmental or social characteristics of the Fund as described in this Annex are systematically integrated throughout the Fund's investment process.

- 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?
  - **a. Minimum underying security score of BB** by MSCI ESG manager (or an other corresponding rating from a similar rating provider) for each Fund security;

#### b. Exclusion Policy

The Manager's exclusion policy applies and this reduces the investment universe accordingly to exclude issuers that fail to comply with the minimum standards set out therein.

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

Not applicable

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

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

Good governance practices of investee companies are addressed by reference to having an MSCI score of BB or above (or an other corresponding rating from a similar rating provider). Companies are screened for good governance by assessing their employee relations, pay practices, management structures and tax compliance. In respect of sovereign issuers, the assessment of good governance practices is based on signatory status to Paris Alignment and Freedom House Status.

#1

90% Aligned with E/S

characteristics

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

Asset allocation describes the share of investments in specific assets.

#2
10% Other

**#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.

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.

Investments means the Fund's Net Asset Value which is the total market value of the product.

At least 90% of the Fund's Investments will be aligned with the environmental and/or social characteristics promoted by the Fund. The remaining investments of the Fund may be invested in cash and cash equivalents for liquidity purposes and derivatives which may be used for investment, risk reduction and hedging purposes.

The asset allocation may change over time and percentages may be updated in the prospectus from time to time. There is no specific allocation among #1A. Calculations may rely on incomplete or inaccurate company or third party data.

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

Derivatives are not used to attain the environmental or social characteristics promoted by this Fund.

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.



### Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

The two graphs below show in green 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?
  0%. There is no commitment to a minimum proportion of investments in transitional and enabling activities.



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

N/A



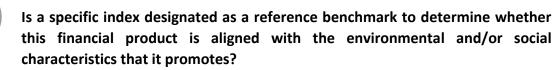
What is the minimum share of socially sustainable investments?  $_{\mbox{\scriptsize N/A}}$ 



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 cash and cash equivalents for liquidity purposes and derivatives which may be used for investment, risk reduction and hedging purposes.

Any "#2 Other" potential investments, other than cash or cash equivalents will be screened according to the Manager's Exclusion Policy.



An index has not been designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/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?

N/A

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

N/A

How does the designated index differ from a relevant broad market index?

N/A

Where can the methodology used for the calculation of the designated index be found?

N/A



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 <u>FAM - Sustainability | Fineco FAM - Fineco FAM (finecoassetmanagement.com)</u>