

## FINECO AM EURO INFLATION-LINKED GOVERNMENT BOND FUND

### SUPPLEMENT DATED 1 DECEMBER 2022

This Supplement contains specific information in relation to **FINECO AM EURO INFLATION-LINKED GOVERNMENT 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”).**

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#### Investment Objective and Policies

The investment objective of the Fund is to achieve capital growth over the medium to long term.

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 will look to achieve its objective by investing in European and non-European Debt Instruments, as defined below and within the below listed limits, with a focus on Inflation-Linked Bonds (“ILBs”).

“**Debt Instruments**” mean

- (i) sovereign and/or supranational and/or government-agency issued fixed income securities i.e. treasury bills, sovereign, supranational and municipal bonds, ILBs, and
- (ii) corporate fixed income securities i.e. debentures and commercial paper, which are rated Investment Grade (at the time of investment) and with either a fixed or floating rate.

The Fund will invest:

- At least 80% of its Net Asset Value in European government bonds categorized as ILBs, being securities issued by sovereign governments/government agencies that contractually link the bond’s principal and interest payment to a nationally/supernationally recognised inflation measure such as the European Harmonized Index of Consumer Prices (HICP); and
- Maximum 20% of its Net Asset Value in European corporate bonds issued by companies of any capitalization across the European region.

By “**European**” in the above, reference is made to Debt Instruments that are issued by governmental or corporate entities based in the Euro zone, meaning in any country within the European Union that has adopted the Euro as its national currency (the “**Euro Zone**”).

The Fund may also invest up to 20% of its Net Asset Value in non-European Debt Instruments, meaning in Debt Instruments that are not issued by governmental or corporate entities within the Euro Zone.

#### *Selection of Debt Instruments*

The Manager will select the bonds to be acquired by focusing on fundamental research and bottom-up security selection analysis. The Manager’s government and corporate bond analysis provides a fundamental assessment of a country or company’s financial health. This involves assessing the probability of losses being accrued, the bond issuers defaulting on the payment of interest and the performance outlook for such bonds. 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 respect, the Manager focuses on relative price, liquidity and risk premium for the purposes of determining which bond 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 above limits. In addition, where a Debt Instrument ceases to be rated or its rating is reduced to below Investment Grade following its

purchase, the Manager will consider such event in determining whether the Fund should continue to hold the security.

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, as described below, 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*

The Fund is actively managed. The Manager has selected the Bloomberg Euro Government Inflation-Linked Bond Index (the "Index"), which 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.

#### *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: <http://finecoassetmanagement.com/sustainability/>. 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: <http://finecoassetmanagement.com/contact/>.

**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:

<b>Environmental Issues</b>	<b>Social Issue</b>	<b>Corporate Governances Issues</b>
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 (FDIs) and other Instruments and Techniques*

**The Fund may engage in transactions in listed and/or unlisted FDIs for investment purposes, efficient portfolio management, risk reduction and hedging.**

The types of FDIs that the Fund may use are interest rate swaps, inflation swaps, futures and forwards, including currency forwards ("FX 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.

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

*Inflation swaps:* An inflation swap operates in a similar way to an interest rate swap except that it is an agreement negotiated between two parties to exchange payments at a fixed or floating rate in return for payments based on realised inflation over the relevant period. Inflation swaps can allow the inflation sensitivity profile of the Fund to be changed more efficiently than through the use of physical cash markets. They may also be used to express views on the future level of inflation.

*Futures and Forwards:* Futures and forwards may be used, and if used they are expected to be used 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 bonds or to markets to which the Fund may be exposed. The Fund may use FX forwards for investment purposes, for efficient portfolio management and for hedging. The Fund is primarily hedged back to its base currency.

### *Long/Short Exposure*

The expected maximum level of long derivative positions which the Fund may hold is 100% of its Net Asset Value, measured on a net 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 100% of its Net Asset Value, measured on a net basis 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. In respect of the direct/indirect costs and fees arising from securities lending, please see the section in the main body of the Prospectus entitled "Securities Financing Transactions".

### *Collateral Management*

All assets received by the Fund as collateral in the context of the use of FDI and/or efficient portfolio management will comply with the criteria for the receipt of such collateral set down by the Central Bank as further detailed under the section of the Prospectus headed "Collateral Policy". In addition, the Fund may be fully collateralised in different transferable securities and money market instruments issued or guaranteed by a Member State, one or more of its local authorities, a third country, or a public international body to which one or more Member States belong provided that the relevant securities are from at least six different issues and

no single issue shall make up more than 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.

**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.

#### **Investor Profile**

The Fund is suitable for both institutional and retail investors seeking active exposure to European government and corporate bonds, with particular focus on ILBs, who are willing to accept medium levels of volatility, seeking to increase the value of their investment over the medium to long term.

**Base Currency:** Euro.

#### **Offer of Shares**

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

Share Class	Initial Offer Price	Initial Offer Period	Currency Denomination and Hedged Class		Sales Charge	Minimum Initial Subscription and Minimum Subsequent Subscription	Distribution Type
L Acc	€100	Closed	Euro	No	Yes / Up to 3%	€1,000/€100	Accumulating

L Dist	€100	Closed	Euro	No	Yes / Up to 3%	€1,000/€100	Distributing
A Acc	€100	Closed	Euro	No	No	€1,000/€100	Accumulating
I Acc	€100	Closed	Euro	No	No	€1,000,000/€100	Accumulating
J Acc	€10,000	Closed	EUR	No	No	€ 1,000,000/€100	Accumulating
J Dist	€10,000	Closed	EUR	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; and

“**Valuation Point**” means 11:59pm (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

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*

Up to 2% per annum (plus VAT, if any) of the Net Asset Value of each Class of Shares.

#### *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.**

#### *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. Investors should particularly pay attention to the following risk factors: "Investment Risk", "Liquidity Risk", "Credit Risk", "Derivatives Risk", "Changes in Interest Rates".

**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**

**Product name:** FINECO AM EURO INFLATION-LINKED GOVERNMENT BOND FUND  
**Legal entity identifier:** 2549007CZ0H065KTQF64

## Environmental and/or social characteristics

### Does this financial product have a sustainable investment objective?

<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input type="radio"/> <input checked="" type="radio"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>

**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.



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

The environmental and/or social characteristics of this product include:

1. **Positive Screening:** Consideration of ESG factors are a key element of portfolio construction. The Manager will determine how such companies integrate E&S characteristics by analysing 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

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

investments supports a tilt towards investment in issuers that have a more positive impact on the environment or society at large.

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
- Tobacco
- 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

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





**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?

- 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

**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, anti-corruption and anti-bribery matters.

*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 capital growth over the medium to long term.

The Fund will look to achieve its objective by investing in European and non-European Debt Instruments, as defined in the supplement, with a focus on Inflation-Linked Bonds (“ILBs”).

The Fund will invest:

- At least 80% of its Net Asset Value in European government bonds categorized as ILBs, being securities issued by sovereign governments/government agencies that contractually link the bond’s principal and interest payment to a nationally/supernationally recognised inflation measure such as the European Harmonized Index of Consumer Prices (HICP); and
- Maximum 20% of its Net Asset Value in European corporate bonds issued by companies of any capitalization across the European region.

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: <https://finecoassetmanagement.com/sustainability/>;

#### *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);
  - b. Issuers involved in the manufacture or product life cycle of controversial weapons (such as but not limited to chemical weapons, cluster munitions and landmines);
  - c. 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 underlying 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

- ***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.

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

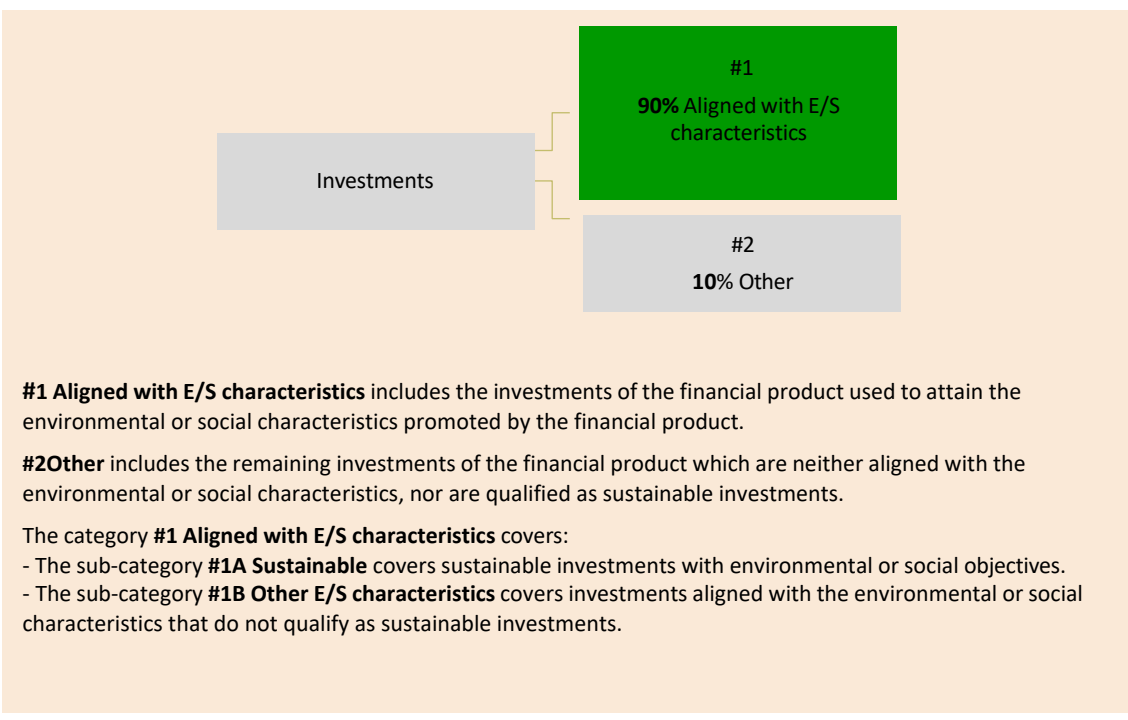


**Enabling activities**

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.



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

\*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.



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

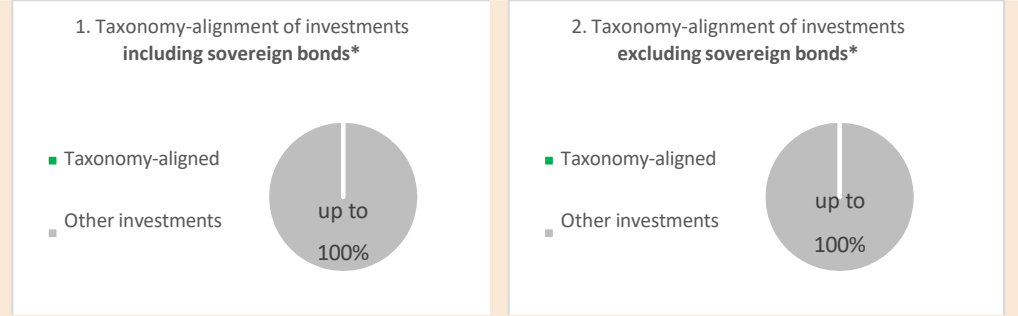
N/A

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

- **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.



**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**

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

**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?**  
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.



**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 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 [FAM - Sustainability | Fineco FAM - Fineco FAM \(finecoassetmanagement.com\)](https://www.finecoassetmanagement.com)