

# Fidelity Active STrategy

A Luxembourg SICAV

**Prospectus | September 2023**

[fidelityinternational.com](https://fidelityinternational.com)

# Additional information for investors in Jersey

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Fidelity Active SStrategy (the “Fund”) is an open-ended investment company with variable capital incorporated in Luxembourg on 14 September 2004. This is a country supplement for investors in Jersey to the Prospectus of the fund dated September 2023 as may be amended from time to time.

The Fund has received the consent of the Jersey Financial Services Commission (the “Commission”) to distribute shares in Jersey.

It must be distinctly understood that in giving such consent the Commission does not take any responsibility for the financial soundness of any schemes or for the correctness of any statements made or opinions expressed with regard to them. The Commission is protected by the Control of Borrowing (Jersey) Law, 1947, as amended, against liability arising from the discharge of its functions under that law.

# Contents

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<b>A Word to Potential Investors</b>	<b>3</b>	<b>Credit Policies</b>	<b>19</b>
<b>Fund Descriptions</b>	<b>4</b>	<b>Risk Descriptions</b>	<b>20</b>
Asia Fund	6	<b>General Investment Powers and Restrictions</b>	<b>26</b>
Emerging Markets Fund	8	<b>Investing in the Funds</b>	<b>39</b>
Europe Fund	10	<b>Management and Governance</b>	<b>55</b>
Global Fund	11	<b>The SICAV</b>	<b>55</b>
Global Multi Asset Selection 80 Fund	12	<b>The Management Company</b>	<b>57</b>
Global Multi Asset Thematic 60 Fund	14	<b>Sustainability Annexes</b>	
<b>Sustainable Investing and ESG Integration</b>	<b>16</b>		
<b>Benchmark Policies</b>	<b>19</b>		

# A Word to Potential Investors

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## All investments involve risk

With these funds, as with most investments, future performance may differ from past performance. There is no guarantee that any fund will meet its objectives or achieve any particular level of performance.

Fund investments are not bank deposits. The value of your investment can go up and down, and you could lose some or all of your invested money. Levels of income could also go up or down (as a rate or in absolute terms). No fund in this prospectus is intended as a complete investment plan, nor are all funds appropriate for all investors.

Before investing in any fund, you should understand its risks, costs and terms of investment, and how well these characteristics align with your own financial circumstances and risk tolerance.

As a potential investor, it is your responsibility to know and follow all applicable laws and regulations, including any foreign exchange restrictions, and to be aware of potential tax consequences (for which the SICAV will under no circumstances be responsible for). We recommend that you consult an investment adviser, legal adviser and tax adviser before investing. Nothing in this document should be considered professional advice of any type.

Any difference among fund security currencies, fund base or share class currencies, and your home currency may expose you to currency risk. If your home currency is different from your share class currency, the performance you experience as an investor could be very different from that of the share class.

## Who can invest in these funds

Distributing this prospectus, offering these shares for sale, or investing in these shares is legal only where the shares are registered for public sale or where sale is not prohibited by local law or regulation. Neither this prospectus nor any other document relating to the SICAV is an offer or solicitation in any jurisdiction, or to any investor, where not legally permitted or where the person making the offer or solicitation is not qualified to do so.

Neither these shares nor the SICAV are registered with the US Securities and Exchange Commission or any other US entity, federal or otherwise, or in any provincial or territorial jurisdiction in Canada. Therefore, unless the Management Company is satisfied that it would not constitute a violation of US or respectively Canadian securities laws, these shares are not sold in the USA or in Canada respectively and are not available to, or for the benefit of, US persons or Canadian residents respectively.

For more information on restrictions on share ownership, contact us (see below).

## Which information to rely on

In deciding whether or not to invest in a fund, you should look at (and read completely) the most recent prospectus, as well as the relevant Key Information Documents (KIDs) and the most recent financial report(s), all of which are considered part of the prospectus. All of these documents are available online at [fidelityinternational.com](https://www.fidelityinternational.com). By subscribing for shares in any of these funds, you are considered to accept the terms described in these documents.

Together, all these documents contain the only approved information about the funds and the SICAV. Anyone who offers any other information or representation, or who makes investment decisions based on the same, does so without authority and at their sole risk. Information in this prospectus, or any document about the SICAV or funds, may have changed since the publication date. In case of any inconsistency in translations of this prospectus, the articles of incorporation or the financial reports, other than differences arising through the need to comply with local regulations or directives, the English version will prevail, unless the Management Company or the depositary decide otherwise.

### TO CONTACT US

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# Fund Descriptions

All of the funds described in this prospectus are part of the SICAV, which functions as an umbrella structure for them. The SICAV exists to offer investors access to professional investment management through a range of funds, each taking its own investment approach while offering high liquidity of fund shares and practicing sound risk diversification.

By law, each fund is permitted to invest as described in “General Investment Powers and Restrictions”, and equally is required to comply with the restrictions stated in that same section.

However, each fund also has its own investment policy, which is generally narrower than what is permitted by law. To a limited extent, a fund may use investments and techniques not described in its investment policy so long as it is consistent with law and regulation, and with the portfolio’s investment objective.

Each fund may also temporarily depart from its investment policy to address unusual market conditions or large unpredictable event. Descriptions of the specific investment objectives, main investments, and other key characteristics of each fund begin on the next page.

The Management Company has overall responsibility for the SICAV’s business operations and its investment activities, including the investment activities of all of the funds. The Management Company may delegate some of its functions to various service providers, such as investment management, distribution and central administration. The management company retains supervisory approval and control over its delegates.

More information about the SICAV, the management company and the service providers appear in the final section of this prospectus, “Management and Governance”.

For information on fees and expenses you may have to pay in connection with your investment, consult the following:

- Maximum fees for buying, exchanging, and selling most shares: this section.
- Annual fees deducted from your investment: this section.
- Recent actual expenses: the applicable KID or the SICAV’s most recent shareholder report.
- Fees for currency conversions, bank transactions, and investment advice: your financial advisor, the transfer agent, the distributor, or other service providers, as applicable.

## TERMS WITH SPECIFIC MEANINGS

The terms below have the following meanings in this prospectus.

**2010 Law** The Luxembourg law of December 17, 2010 on Undertakings for Collective Investment, as amended.

**the articles** means the Articles of Incorporation of the SICAV

**article 8 product** In SFDR, a fund that promotes environmental and/or social characteristics.

**article 9 product** In SFDR, a fund that has sustainable investing as its objective.

**assets** in the context of fund assets, means a fund’s total net assets

**base currency** The currency in which a fund does the accounting for its fund and maintains its primary NAV.

**below investment grade (high yield) securities** shall mean securities with a rating of BB+ or less from Standard & Poor’s or equivalent rating from an internationally recognised rating agency (in case of divergent ratings, the worst of the best two credit ratings applies).

**the Board** The Board of Directors of the SICAV.

**bond** Any type of debt or debt-related security.

**business day** A day on which the banks in the relevant jurisdiction are normally open for business.

**Connected Person** ‘Connected Person’ of any investment adviser, Investment Manager, depositary or any Distributor means:

- a) any person beneficially owning, directly or indirectly, 20% or more of the ordinary share capital of that company or able to exercise, directly or indirectly, 20% or more of the total votes in that company;
- b) any person controlled by a person who meets one or both of the requirements set out in a) above;
- c) any company 20% or more of whose ordinary share capital is beneficially owned, directly or indirectly, by any investment adviser, Investment Manager or Share Distributor taken together; and any company 20% or more of the total votes in which can be exercised, directly or indirectly by such investment adviser, Investment Manager or Share Distributor taken together; and
- d) any director or officer of any investment adviser or Investment Manager or Share Distributor or of any Connected Person of that company, as defined in a), b) or c) above

**distressed securities** Securities issued by a company, sovereign state or entity that are either in default or in high risk of default.

**Distributor** a FIL Group company named in the Prospectus through which Shares in the SICAV may be bought, sold or switched.

**Efficient Portfolio Management** refers to techniques and instruments which fulfil the following criteria:

- a) they are economically appropriate in that they are realised in a cost effective way;
- b) they are entered into for one or more of the following specific aims:
  - (i) reduction of risk
  - (ii) reduction of cost;
  - (iii) generation of additional capital or income for the funds with a level of risk which is consistent with the risk profile of the funds and the risk diversification rules of the funds
- c) their risks are adequately captured by the risk management process of the SICAV.

**emerging markets** generally defined as emerging or developing economies by the World Bank the United Nations or other authorities or included in the MSCI Emerging Markets Index or other comparable index.

**ESG** Environmental, social and governance.

**ESG characteristics** An indication of ESG characteristics based on Fidelity’s assessments, proprietary ESG ratings and/or third-party data.

**Equity** includes equity and equity-linked instruments.

**FIL Group or Fidelity** International Ltd (FIL) and its affiliated companies.

**financial reports** The annual report of the SICAV, along with any semi-annual report that has been issued since the most recent annual report.

**fund** Except where indicated otherwise, any fund for which the SICAV serves as an umbrella UCITS.

**General Distributor** FIL Distributors

**government** Any government, government agency, supranational or public international entity, local authority or government-sponsored organisation.

**intermediary** Any intermediary, distribution agent or other intermediary with whom the distributor has an agreement to distribute shares.

**invest** in “Fund Descriptions” means both direct and indirect exposure to assets

**KID** Key Information Document.

## TERMS WITH SPECIFIC MEANINGS *Continued.*

**listed** Listed or traded on a Regulated Market

**NAV** Net asset value per share; the value of one share of a fund.

**the prospectus** This document.

**regulated market** A market within the meaning of directive 2014/65/EC of 15 May 2014 or any other market which is regulated, operates regularly and is recognised and open to the public. For the avoidance of any doubt this shall include the US OTC Bond Market, the Moscow Exchange, the Shanghai Stock Exchange, the Shenzhen Stock Exchange as well as the mainland China interbank bond market.

**research fees** Fees payable by the relevant fund to third parties in respect of investment research and related advisory services relating to equities and equity related securities. Further information in respect of the Research Fees, including the maximum amount that may be charged to a fund and details of the collection methodology, is available at the registered office of the SICAV or on the website [www.fidelityinternational.com/researchbudget](http://www.fidelityinternational.com/researchbudget). For the avoidance of doubt, no such fees are currently being charged

**REIT** Real Estate Investment Trust or REIT is an entity that is dedicated to owning, and in most cases, managing real estate

**RMB** is a colloquial reference to the Chinese Renminbi, which is also known internationally as the Chinese Yuan ('CNY'). Whilst the CNY is traded both onshore in China and offshore (primarily in Hong Kong), it is the same currency although currently traded at different rates. The offshore rate for trading CNY is generally referred to as 'CNH'. The CNH rate will be used when determining the value of the Shares of a fund, as well as for hedging purposes

**SFDR** The Regulation (EU) 2019/2088 on the sustainability-related disclosures in the financial services sector.

**SFTR Regulation** Regulation (EU) 2015/2365 on transparency of securities financing transactions

**sustainable investment** is a sustainable investment is an investment in an economic activity that contributes, to an environmental or social objective, provided that such investment does not significantly harm any other environmental or social objectives and that the investee companies follow good governance practices.

**Sustainability Annex** is the annex prepared for each fund which is subject to the requirements of article 8 or article 9 of the SFDR containing pre-contractual disclosures in accordance with the SFDR.

**Sustainability Risks** are an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment, as defined under the SFDR.

**the SICAV** Fidelity Active Strategy.

**UCITS** An Undertaking for Collective Investment in Transferable Securities governed by the Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities.

**US person** Any of the following, as defined in the US laws or regulations indicated:

a "United States person" per section 7701(a)(30) of the Internal Revenue Code of 1986

a "U.S. person" per Regulation S of the 1933 Act

a person that is "in the United States" per Rule 202(a)(30)-1 under the Investment Advisers Act of 1940

a person that does not qualify as a "Non-United States Person" as per Commodities Futures Trading Commission Rule 4.7

**valuation day** Each weekday (any Monday to Friday inclusive) excluding 25 December ('Christmas Day') and 1 January ('New Year's Day') as well as any other day which the Directors have determined, in the best interests of the shareholders, as non-Valuation Day for specific funds. Non-Valuation Day may for example be any day observed as a holiday on a stock exchange which is the principal market for a significant portion of the investments attributable to a fund, or any day which is a holiday elsewhere so as to impede the calculation of fair market value of the investments attributable to a given fund, which may also include any day immediately preceding such relevant market closure where the dealing cut-off time of the relevant fund occurs at a time when the relevant underlying main market is already closed to trading and the following days are a period of consecutive market closure days.

The list of expected non-Valuation Day is available on <https://fidelityinternational.com/non-valuation-days/> and is updated in advance on a semi-annual basis. However, the list may be further updated from time to time in advance as is reasonably practicable in exceptional circumstances where the Directors believe that it is in the best interests of the shareholders

### Other interpretation

- in the absence of further specification in "Fund Descriptions", references to an issuer or company's geographic area means either that the issuer is listed, incorporated, headquartered, or derives most, or a significant part, of its revenues in that geographic area
- no index provider sponsors, endorses, sells, or promotes these funds or makes any warranty, representation or judgment about the SICAV, the management company, the investment manager or the use of any index

## CURRENCY ABBREVIATIONS

**AUD** Australian dollar

**CAD** Canadian dollar

**CHF** Swiss franc

**CNH** Chinese offshore renminbi

**CNY** Chinese onshore renminbi

**CZK** Czech koruna

**EUR** Euro

**GBP** British pound sterling

**HKD** Hong Kong dollar

**HUF** Hungarian forint

**JPY** Japanese yen

**KRW** South Korean won

**NOK** Norwegian krone

**NZD** New Zealand dollar

**PLN** Polish zloty

**RMB** Onshore/offshore renminbi

**SEK** Swedish krona

**SGD** Singapore dollar

**TWD** New Taiwan dollar

**USD** US dollar

# Fidelity Active Strategy – Asia Fund

## Investment Objective and Policy

**OBJECTIVE** The fund aims to achieve capital growth over the long term.

**INVESTMENT POLICY** The fund invests at least 70% of its assets in equities of companies that are listed, headquartered, or do most of their business in the Asia region (excluding Japan) including emerging markets.

The fund may invest in the following assets according to the percentages indicated:

- China A and B shares (directly and/or indirectly): less than 50% (in aggregate)
- SPACs: less than 5%
- Money market instruments: up to 20%

The Investment Manager may concentrate its investments in a limited number of companies, resulting in portfolio concentration.

**INVESTMENT PROCESS** In actively managing the fund, the Investment Manager considers growth and valuation metrics, company financials, return on capital, cash flows and other measures, as well as company management, industry economic conditions, and other factors.

The Investment Manager takes into account sustainability risks in its investment process.

For more information, see “Sustainable Investing and ESG Integration”.

**DERIVATIVES AND TECHNIQUES** The fund may use derivatives for hedging, efficient portfolio management and investment purposes. The fund uses derivatives, including complex derivative instruments or strategies, to meet the investment objectives of the fund which may result in leverage. The fund may maintain long and short exposure to securities through derivatives.

In addition to core derivatives (see “How the Funds Use Instruments and Techniques”), the fund intends to use TRS.

**TRS (including CFD) usage** Expected 75% maximum 165%

**Securities lending** Expected 5% maximum 30%

**Repos/reverse repos** None

**BENCHMARK(S)** MSCI AC Asia ex Japan Index\* an index that does not take into account ESG characteristics. Used for: risk monitoring, investment selection, performance comparison, and performance fee calculation.

The fund invests in securities of the benchmark, however, management of the fund is discretionary, therefore the fund may invest in securities not included in the benchmark, and its

performance over any period may or may not deviate significantly from that of the benchmark.

\*Not yet listed in the register referred to in article 36 of the Benchmarks Regulation, as it is relying on transitional provisions

**BASE CURRENCY** USD

## Main Risks

See “Risk Descriptions” for more information.

- Active management
- China
- Counterparty and collateral
- Concentration risk
- Currency
- Derivatives
- Emerging markets
- Equities
- Hedging
- Investment fund
- Leverage
- Liquidity
- Market
- Operational
- Special Purpose Acquisition Companies risk
- Sustainable investing

**RISK MANAGEMENT METHOD** Relative VaR (limited to 200% of the VaR of the benchmark). Expected leverage: 220% (may be higher or lower but not expected to exceed 250%).

## Planning Your Investment

**INVESTOR PROFILE** This product may appeal to investors

- with a basic knowledge of and no or limited experience of investing in funds;
- who plan to hold their investment for a recommended holding period of at least 4 years;
- who seek capital growth over the recommended holding period; and
- who understand the risk of losing some or all of the capital invested.

**ORDER PROCESSING** Requests to buy, switch or sell fund shares that are received and accepted by the Management Company by 1:00 PM CET (12:00 noon GMT) on any Valuation Day are ordinarily processed at the NAV for that Valuation Day. Settlement normally occurs within 3 business days.

The fund qualifies under the German Investment Tax Act 2018 as an equity fund (Aktienfonds).

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Main Share Classes

Class	Minimum Investment (USD) <sup>1</sup>		Maximum Dealing Fees	Maximum Annual Fees		
	Initial and holding	Subsequent	Entry	Management	Distribution	Performance*
A	2,500	1,000	5.25%	1.50%	—	20%
I	10 million	100,000	1%	0.80%	—	20%
Y	2,500	1,000	—	0.80%	—	20%

For a current and complete list of available share classes, including currency hedged, please see section “Investing in Funds”. See section “Fund Fees and Costs” for detailed explanation of above fees. <sup>1</sup> Or equivalent in any other freely convertible currency.

\*The performance fee is paid if the relevant class exceeds the return of the relevant index by more than 2% on an annualised basis, which is adjusted for the return of the relevant cash index. Accrued daily, with accruals written back in case of underperformance, and paid to the Investment Manager annually.



# Fidelity Active STrategy – Emerging Markets Fund

## Investment Objective and Policy

**OBJECTIVE** The fund aims to achieve capital growth over the long term.

**INVESTMENT POLICY** The fund invests at least 70% of its assets in equities of companies that are listed, headquartered or do most of their business in global emerging markets including Latin America, Asia, Africa, Eastern Europe (including Russia) and the Middle East. The fund may also invest up to 20% of its assets in money market instruments on an ancillary basis.

The fund invests at least 50% of its assets in securities of companies with favourable environmental, social and governance (ESG) characteristics.

The fund may invest less than 50% of its assets (directly and/or indirectly) in China A and B shares (in aggregate).

**INVESTMENT PROCESS** In actively managing the fund, the Investment Manager considers growth and valuation metrics, company financials, return on capital, cash flows and other measures, as well as company management, industry economic conditions, and other factors. The Investment Manager also considers ESG characteristics when assessing investment risks and opportunities. In determining favourable ESG characteristics, the Investment Manager takes into account ESG ratings provided by Fidelity or external agencies. Through the investment management process the Investment Manager aims to ensure that investee companies follow good governance practices.

The fund adheres to the Fidelity Sustainable Investing Framework standards. For more information, see “Sustainable Investing and ESG Integration” and the Sustainability Annex.

**SFDR product category** Article 8 (promotes environmental and/or social characteristics).

**DERIVATIVES AND TECHNIQUES** The fund may use derivatives for hedging, efficient portfolio management and investment purposes. The fund uses derivatives, including complex derivative instruments or strategies, to meet the investment objectives of the fund which may result in leverage. The fund may maintain long and short exposure to securities through derivatives.

In addition to core derivatives (see “How the Funds Use Instruments and Techniques”), the fund intends to use TRS.

**TRS (including CFD) usage** Expected 75% maximum 175%

**Securities lending** Expected 5% maximum 30%

**Repos/reverse repos** None

**BENCHMARK(S)** MSCI Emerging Markets Index \* an index that does not take into account ESG characteristics. Used for: investment selection, risk monitoring, and performance comparison, and performance fee calculation.

The fund invests in securities of the benchmark, however, management of the fund is discretionary, therefore the fund may invest in securities not included in the benchmark, and its performance over any period may or may not deviate significantly from that of the benchmark.

\*Not yet listed in the register referred to in article 36 of the Benchmarks Regulation, as it is relying on transitional provisions

**BASE CURRENCY** USD

## Main Risks

See “Risk Descriptions” for more information.

- Active management
- China
- Counterparty and collateral
- Currency
- Derivatives
- Emerging markets
- Equities
- Hedging
- Investment fund
- Leverage
- Liquidity
- Market
- Operational
- Sustainable investing

**RISK MANAGEMENT METHOD** Relative VaR (limited to 200% of the VaR of the benchmark). Expected leverage: 300% (may be higher or lower but not expected to exceed 400%).

## Planning Your Investment

**INVESTOR PROFILE** This product may appeal to investors

- with a basic knowledge of and no or limited experience of investing in funds;
- who plan to hold their investment for a recommended holding period of at least 4 years;
- who seek capital growth over the recommended holding period; and
- who understand the risk of losing some or all of the capital invested.

**ORDER PROCESSING** Requests to buy, switch or sell fund shares that are received and accepted by the Management Company by 1:00 PM CET (12:00 noon UK time) on any Valuation Day are ordinarily processed at the NAV for that Valuation Day. Settlement normally occurs within 3 business days.

The fund qualifies under the German Investment Tax Act 2018 as an equity fund (Aktienfonds).

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## Main Share Classes

Class	Minimum Investment (USD) <sup>1</sup>		Maximum Dealing Fees	Maximum Annual Fees		
	Initial and holding	Subsequent	Entry	Management	Distribution	Performance*
A	2,500	1,000	5.25%	1.50%	—	20%
E	2,500	1,000	—	1.50%	0.75%	20%
I	10 million	100,000	1%	0.80%	—	20%
Y	2,500	1,000	—	0.80%	—	20%

For a current and complete list of available share classes, including currency hedged, please see section “Investing in Funds”. See section “Fund Fees and Costs” for detailed explanation of above fees. <sup>1</sup> Or equivalent in any other freely convertible currency.

\*The performance fee is paid if the relevant class exceeds the return of the relevant index by more than 2% on an annualised basis, which is adjusted for the return of the relevant cash index. Accrued daily, with accruals written back in case of underperformance, and paid to the Investment Manager annually.

# Fidelity Active Strategy – Europe Fund

## Investment Objective and Policy

**OBJECTIVE** The fund aims to achieve capital growth over the long term.

**INVESTMENT POLICY** The fund invests at least 70% of its assets, in equities of, and related instruments providing exposure to, companies that are listed, headquartered or do most of their business in Europe. The fund may also invest up to 20% of its assets in money market instruments on an ancillary basis.

The fund invests at least 50% of its assets in securities of companies with favourable environmental, social and governance (ESG) characteristics.

**INVESTMENT PROCESS** In actively managing the fund, the Investment Manager considers growth and valuation metrics, company financials, return on capital, cash flows and other measures, as well as company management, industry economic conditions, and other factors. The Investment Manager also considers ESG characteristics when assessing investment risks and opportunities. In determining favourable ESG characteristics, the Investment Manager takes into account ESG ratings provided by Fidelity or external agencies. Through the investment management process the Investment Manager aims to ensure that investee companies follow good governance practices.

The fund adheres to the Fidelity Sustainable Investing Framework standards. For more information, see “Sustainable Investing and ESG Integration” and the Sustainability Annex.

**SFDR product category** Article 8 (promotes environmental and/or social characteristics).

**DERIVATIVES AND TECHNIQUES** The fund may use derivatives for hedging, efficient portfolio management and investment purposes. The fund uses derivatives, including complex derivative instruments or strategies, to meet the investment objectives of the fund which may result in leverage. The fund may maintain long and short exposure to securities through derivatives.

In addition to core derivatives (see “How the Funds Use Instruments and Techniques”), the fund intends to use TRS.

**TRS (including CFD) usage** Expected 50% maximum 175%

**Securities lending** Expected 5% maximum 30%

**Repos/reverse repos** None

**BENCHMARK(S)** MSCI Europe Index\* an index that does not take into account ESG characteristics. Used for: risk monitoring, performance comparison, and performance fee calculation.

The fund invests in securities of the benchmark, however, management of the fund is discretionary, therefore the fund may invest in securities not included in the benchmark, and its performance over any period may or may not deviate significantly from that of the benchmark.

\*Not yet listed in the register referred to in article 36 of the Benchmarks Regulation, as it is relying on transitional provisions

**BASE CURRENCY** EUR

## Main Risks

See “Risk Descriptions” for more information.

- Active management
- China
- Counterparty and collateral
- Currency
- Derivatives
- Equities
- Hedging
- Investment fund
- Leverage
- Liquidity
- Market
- Operational
- Sustainable investing

**RISK MANAGEMENT METHOD** Relative VaR (limited to 200% of the VaR of the benchmark). Expected leverage: 200% (may be higher or lower but not expected to exceed 250%).

## Planning Your Investment

**INVESTOR PROFILE** This product may appeal to investors

- with a basic knowledge of and no or limited experience of investing in funds;
- who plan to hold their investment for a recommended holding period of at least 4 years;
- who seek capital growth over the recommended holding period; and
- who understand the risk of losing some or all of the capital invested.

**ORDER PROCESSING** Requests to buy, switch or sell fund shares that are received and accepted by the Management Company by 1:00 PM CET (12:00 noon UK time) on any Valuation Day are ordinarily processed at the NAV for that Valuation Day. Settlement normally occurs within 3 business days

The fund qualifies under the German Investment Tax Act 2018 as an equity fund (Aktienfonds).

## Main Share Classes

Class	Minimum Investment (USD) <sup>1</sup>		Maximum Dealing Fees	Maximum Annual Fees		
	Initial and holding	Subsequent	Entry	Management	Distribution	Performance*
A	2,500	1,000	5.25%	1.50%	—	20%
E	2,500	1,000	—	1.50%	0.75%	20%
I	10 million	100,000	1%	0.80%	—	20%
W/Y	2,500	1,000	—	0.80%	—	20%

For a current and complete list of available share classes, including currency hedged, please see section “Investing in Funds”. See section “Fund Fees and Costs” for detailed explanation of above fees. <sup>1</sup> Or equivalent in any other freely convertible currency.

\*The performance fee is paid if the relevant class exceeds the return of the relevant index by more than 2% on an annualised basis, which is adjusted for the return of the relevant cash index. Accrued daily, with accruals written back in case of underperformance, and paid to the Investment Manager annually.

# Fidelity Active STRategy – Global Fund

## Investment Objective and Policy

**OBJECTIVE** The fund aims to achieve capital growth over the long term.

**INVESTMENT POLICY** The fund invests at least 70% of its assets in equities of, and related instruments providing exposure to, companies throughout the world, including emerging markets. The fund may also invest up to 20% of its assets in money market instruments on an ancillary basis.

**INVESTMENT PROCESS** In actively managing the fund, the Investment Manager considers valuation metrics, company financials, return on capital, cash flows and other measures, as well as company management, industry, economic conditions, and other characteristics. The Investment Manager takes into account sustainability risks in its investment process.

For more information, see “Sustainable Investing and ESG Integration”.

### DERIVATIVES AND TECHNIQUES

The fund may use derivatives for hedging, efficient portfolio management and investment purposes. The fund uses derivatives, including complex derivative instruments or strategies, to meet the investment objectives of the fund which may result in leverage. The fund may maintain long and short exposure to securities through derivatives.

In addition to core derivatives (see “How the Funds Use Instruments and Techniques”), the fund intends to use TRS.

**TRS (including CFD) usage** Expected 75% maximum 175%

**Securities lending** Expected 5% maximum 30%

**Repos/reverse repos** None

**BENCHMARK(S)** MSCI ACWI Index\* an index that does not take into account ESG characteristics. Used for: risk monitoring, performance comparison, and performance fee calculation.

The fund invests in securities of the benchmark, however, management of the fund is discretionary, therefore the fund may invest in securities not included in the benchmark, and its performance over any period may or may not deviate significantly from that of the benchmark.

\*Not yet listed in the register referred to in article 36 of the Benchmarks Regulation, as it is relying on transitional provisions

**BASE CURRENCY** USD

## Main Risks

See “Risk Descriptions” for more information.

- Active management
- China
- Counterparty and collateral
- Currency
- Derivatives
- Emerging markets
- Equities
- Hedging
- Investment fund
- Leverage
- Liquidity
- Market
- Operational

**RISK MANAGEMENT METHOD** Relative VaR (limited to 200% of the VaR of the benchmark). Expected leverage: 210% (may be higher or lower but not expected to exceed 250%).

## Planning Your Investment

**INVESTOR PROFILE** This product may appeal to investors

- with a basic knowledge of and no or limited experience of investing in funds;
- who plan to hold their investment for a recommended holding period of at least 4 years;
- who seek capital growth over the recommended holding period; and
- who understand the risk of losing some or all of the capital invested.

**ORDER PROCESSING** Requests to buy, switch or sell fund shares that are received and accepted by the Management Company by 1:00 PM CET (12:00 noon UK time) on any Valuation Day are ordinarily processed at the NAV for that Valuation Day. Settlement normally occurs within 3 business days.

The fund qualifies under the German Investment Tax Act 2018 as an equity fund (Aktienfonds).

## Main Share Classes

Class	Minimum Investment (USD) <sup>1</sup>		Maximum Dealing Fees	Maximum Annual Fees		
	Initial and holding	Subsequent	Entry	Management	Distribution	Performance*
A	2,500	1,000	5.25%	1.50%	—	20%
E	2,500	1,000	—	1.50%	0.75%	20%
I	10 million	100,000	1%	0.80%	—	20%
Y	2,500	1,000	—	0.80%	—	20%

For a current and complete list of available share classes, including currency hedged, please see section “Investing in Funds”. See section “Fund Fees and Costs” for detailed explanation of above fees. <sup>1</sup> Or equivalent in any other freely convertible currency.

\*The performance fee is paid if the relevant class exceeds the return of the relevant index by more than 2% on an annualised basis, which is adjusted for the return of the relevant cash index. Accrued daily, with accruals written back in case of underperformance, and paid to the Investment Manager annually.

Fidelity Active SStrategy –

# Global Multi Asset Selection 80 Fund

## Investment Objective and Policy

**OBJECTIVE** The Fund aims to achieve capital growth over the long-term.

**INVESTMENT POLICY** The fund invests in a diversified portfolio of equities and debt securities issued by governments, quasi governments, banks, financial institutions and corporate entities from anywhere in the world, including emerging markets. The fund aims to achieve its objective by investing in other UCITS and UCIs to take exposure to the assets referred to below. On an ancillary basis and depending on market conditions, the fund may invest in such assets directly.

At the start of the fund lifecycle, the fund will allocate investments to UCITS and UCIs invested in money market instruments and debt securities.

Over the three years after the initial subscription period the allocation of the fund’s exposure to equity will gradually increase to approximately 80% of its assets, which thereafter will remain the target exposure for the remainder of the fund’s lifecycle.

As the fund increases equity exposure, the fund aims to invest in a variety of global equity strategies, which may include long-term market themes, sector exposure, regional, global and/or style specific strategies.

The fund invests at least 50% of its assets in securities of issuers, with favourable environmental, social and governance (ESG) characteristics or in UCITS and UCIs which either promote environmental and social characteristics or have a sustainable investment objective.

The fund may invest in the following assets according to the percentages indicated:

- UCITS and UCIs: up to 100%
- Money market instruments: up to 20%
- Hybrids and contingent convertible (CoCo) bonds: less than 30%, with CoCos less than 20%
- SPACs: less than 5%
- Collateralised and securitised debt instruments: less than 20%
- Emerging markets: up to 30%
- REITs: up to 10%
- High yield bonds: up to 20%

The fund is not expected to actively seek exposure to distressed securities.

### INVESTMENT PROCESS

The fund is actively managed and is not managed with reference to a benchmark.

In principle the Investment Manager will aim to increase equity exposure monthly on a linear basis subject to market conditions. The Investment Manager will allocate investments across asset classes and geographic areas based on their potential to generate capital growth or reduce overall risk. The fund adopts a multi asset approach which affords significant potential for diversification. The investment process also considers ESG characteristics when assessing investment risks and opportunities. In determining favourable ESG characteristics, the Investment Manager takes into account ESG ratings provided by Fidelity or external agencies. Through the investment management process, the Investment Manager aims to ensure that investee companies follow good governance practices.

The fund adheres to the Fidelity Sustainable Investing Framework standards. For more information, see “Sustainable Investing Policy and ESG Integration” and the Sustainability Annex.

**SFDR product category** Article 8 (promotes environmental and/or social characteristics).

**DERIVATIVES AND TECHNIQUES** The fund may use derivatives to reduce risk and for efficient portfolio management purposes. In addition to core derivatives (see “How the Funds Use Instruments and Techniques”), the fund intends to use TRS.

**TRS (including CFD) usage** Expected 30% maximum 130%

**Securities lending** Expected 15%; maximum 30%

**Repos/reverse repos** Expected 0%; maximum 30%

**BENCHMARK(S)** None

**BASE CURRENCY** EUR

**INITIAL SUBSCRIPTION PERIOD, LAUNCH AND INITIAL PRICE** The initial subscription period (“Initial Subscription Period”) for the fund shall start at inception (the “Launch Date”) or such earlier or later date as the Management Company may determine and shall end at 13:00 CET on 8 December 2023 or such earlier or later date as the Management Company may determine.

The initial subscription price for Classes T shares in the fund shall be 100.00 euro. After the end of the Initial Subscription Period, the fund will be closed to subscriptions to Class T shares for a period of three years that will end after the dealing cut-off on 8 December 2026 or such earlier or later date as the Management Company may determine. Class A and E shares are available for subscription on or after the Launch Date. The initial subscription price for Class A and E shares shall be 100.00 euro.

## Main Risks

See “Risk Descriptions” for more information.

- Active management
  - CoCos
  - Counterparty and collateral
  - Credit
  - Currency
  - Derivatives
  - Emerging Markets
  - Hedging
- High yield securities
  - Interest rate
  - Investment fund
  - Liquidity
  - Market
  - Operational
  - Securitisation
  - Real Estate
  - Sustainable investing

**RISK MANAGEMENT METHOD** Commitment.

## Planning Your Investment

**INVESTOR PROFILE** This product may appeal to investors

- with a basic knowledge of and no or limited experience of investing in funds;
- who plan to hold their investment for a recommended holding period of at least 5 years;
- who seek capital growth over the recommended holding period; and
- who understand the risk of losing some or all of the capital invested.

**MINIMUM VIABLE AMOUNT** The minimum viable amount (the “Minimum Viable Amount”) for the fund shall be 50 million euro. In the event that the Net Asset Value falls under or does not reach (prior to the close of the Initial Subscription Period) the Minimum Viable Amount, the Management Company may decide not to launch the fund or to liquidate the fund in accordance with the Prospectus.

**ORDER PROCESSING (OUTSIDE OF INITIAL SUBSCRIPTION PERIOD)** Requests to buy, switch or sell fund shares that are received and accepted by the Management Company by 1:00 PM CET (12:00 noon UK time) on any Valuation Day are ordinarily processed at the NAV for that Valuation Day. Settlement normally occurs within 3 business days.

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## Main Share Classes

Class	Minimum Investment (EUR) <sup>1</sup>		Maximum Dealing Fees	Maximum Annual Fees		
	Initial and holding	Subsequent	Entry	Management*	Distribution	Performance
A	100	100	5.25%	1.45%	—	—
E	100	100	—	1.45%	0.80%	—
T	1000	1000	— **	1.25%	0.80%	—

For a current and complete list of available share classes, including currency hedged, please see section “Investing in Funds”. See section “Fund Fees and Costs” for detailed explanation of above fees. <sup>1</sup> Or equivalent in any other freely convertible currency.

\* The maximum management fee that may be charged to both the fund and the UCITS and/or other UCIs in which the fund may invest shall not exceed 3.0% per annum of the fund's assets.

\*\* A contingent deferred sales charge applies to this share class, please refer to the section “Investing in the Funds” for additional information.

Fidelity Active SStrategy –

Global Multi Asset Thematic 60 Fund

Investment Objective and Policy

**OBJECTIVE** The Fund aims to achieve capital growth over the long-term.

**INVESTMENT POLICY** The fund invests directly or indirectly through UCITS and UCIs in a diversified portfolio of equities and debt securities issued by governments, quasi governments, banks, financial institutions and corporate entities from anywhere in the world, including emerging markets.

At the start of the fund lifecycle, the fund will allocate investments to UCITS and UCIs invested in debt securities.

Over the five years after launch, the allocation of the fund’s exposure to equity will gradually increase to approximately 60% (and in any event no less than 40% nor more than 80%) of its assets. As the fund increases equity exposure, the fund aims to invest in a variety of long-term market themes that may benefit from structural changes in economic, social and environmental factors, such as disruptive technologies, demographics and climate change. Disruptive technologies are innovations that meaningfully change consumer, industry or company behaviour. Demographic trends include those related to an ageing population, healthcare and retirement, growth of the middle class, consumption, financial services, urbanization, and population growth resources, productivity and automation.

The fund invests directly or indirectly at least 50% of its assets in securities of issuers, with favourable environmental, social and governance (ESG) characteristics and/or in UCITS and/or UCIs which either promote environmental and social characteristics or have a sustainable investment objective.

The fund may invest in the following assets according to the percentages indicated:

- Money market instruments: up to 10%
- UCITS and UCIs: up to 100%
- Collateralised and securitised debt instruments: less than 20%
- Hybrids and contingent convertible (CoCo) bonds: less than 30%, with CoCos less than 20%
- Below investment grade or unrated bonds: less than 20%
- SPACs: less than 5%

INVESTMENT PROCESS

The fund is actively managed and is not managed with reference to a benchmark.

In principle the Investment Manager will aim to increase equity exposure monthly on a linear basis subject to market conditions. The Investment Manager will allocate investments across asset classes and geographic areas based on their potential to generate capital growth or reduce overall risk. The fund adopts a multi asset approach which affords significant potential for diversification. The

investment process also considers ESG characteristics when assessing investment risks and opportunities. In determining favourable ESG characteristics, the Investment Manager takes into account ESG ratings provided by Fidelity or external agencies. Through the investment management process, the Investment Manager aims to ensure that investee companies follow good governance practices.

The fund adheres to the Fidelity Sustainable Investing Framework standards. For more information, see “Sustainable Investing Policy and ESG Integration” and the Sustainability Annex.

**SFDR product category** Article 8 (promotes environmental and/or social characteristics).

**DERIVATIVES AND TECHNIQUES** The fund may use derivatives for efficient portfolio management purposes. In addition to core derivatives (see “How the Funds Use Instruments and Techniques”), the fund intends to use TRS.

**TRS (including CFD) usage** Expected 30% maximum 130%  
**Securities lending** Expected 15%; maximum 30%  
**Repos/reverse repos** Expected 0%; maximum 30%

**BENCHMARK(S)** None

**BASE CURRENCY** EUR

**INITIAL SUBSCRIPTION PERIOD, LAUNCH AND INITIAL PRICE** The initial subscription period (“Initial Subscription Period”) for the fund shall start on 20 February 2023 or such earlier or later date as the Management Company may determine and shall end on 16:00 CET on 24 May 2023 or such earlier or later date as the Management Company may determine. The fund will launch on 25 May 2023 or such earlier or later date as the Management Company may determine (the “Launch Date”). The initial subscription price for Classes T shares in the fund shall be 100.00 euro. After the end of the Initial Subscription Period, the fund will be closed to subscriptions to Class T shares for a period of five years that will end after the dealing cut-off on 25 May 2028 or such earlier or later date as the Management Company may determine. Class A and E shares are available for subscription on or after the Launch Date. The initial subscription price for Class A and E shares shall be 100.00 euro.

Main Risks

See “Risk Descriptions” for more information.

- Active management
  - CoCos
  - Counterparty and collateral
  - Credit
  - Currency
  - Derivatives
  - Emerging Markets
  - Hedging
- High yield securities
  - Interest rate
  - Investment fund
  - Liquidity
  - Market
  - Operational
  - Securitisation
  - Special Purpose Acquisition Companies risk
  - Sustainable investing

**RISK MANAGEMENT METHOD** Commitment.

Planning Your Investment

**INVESTOR PROFILE** This product may appeal to investors

- with a basic knowledge of and no or limited experience of investing in funds;
- who plan to hold their investment for a recommended holding period of at least 5 years;
- who seek capital growth over the recommended holding period; and
- who understand the risk of losing some or all of the capital invested.

**MINIMUM VIABLE AMOUNT** The minimum viable amount (the “Minimum Viable Amount”) for the fund shall be 50 million euro. In the event that the Net Asset Value falls under or does not reach (prior to the close of the Initial Subscription Period) the Minimum Viable Amount, the Management Company may decide not to launch the fund or to liquidate the fund in accordance with the Prospectus.

**ORDER PROCESSING (OUTSIDE OF INITIAL SUBSCRIPTION PERIOD)** Requests to buy, switch or sell fund shares that are received and accepted by the Management Company by 1:00 PM CET (12:00 noon UK time) on any Valuation Day are ordinarily processed at the NAV for that Valuation Day. Settlement normally occurs within 3 business days.

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## Main Share Classes

Class	Minimum Investment (EUR) <sup>1</sup>		Maximum Dealing Fees	Maximum Annual Fees		
	Initial and holding	Subsequent	Entry	Management*	Distribution	Performance
A	100	100	5.25%	1.45%	—	—
E	100	100	—	1.45%	0.50%	—
T	1000	1000	— **	1.25%	0.50%	—

For a current and complete list of available share classes, including currency hedged, please see section “Investing in Funds”. See section “Fund Fees and Costs” for detailed explanation of above fees. <sup>1</sup> Or equivalent in any other freely convertible currency.

\* The maximum management fee that may be charged to both the fund and the UCITS and/or other UCIs in which the fund may invest shall not exceed 3.0% per annum of the fund's assets.

\*\* A contingent deferred sales charge applies to this share class, please refer to the section “Investing in the Funds” for additional information.



# Sustainable Investing and ESG Integration

## Sustainable Investing

The EU Sustainable Finance Disclosure Regulation (SFDR) are EU rules which came into effect in 2021 and aims to help investors understand the sustainability profile of financial products. SFDR focuses on the disclosure of environmental, social and governance (ESG) considerations by firms and within the investment process. SFDR is part of the EU's Sustainable Finance Framework which promotes sustainable investment across the EU. SFDR establishes requirements for pre-contractual and ongoing disclosures to investors including on the integration of sustainability risks, the consideration of adverse sustainability impacts, on sustainable investment objectives, or on the promotion of environmental or social characteristics, in investment decision - making. The EU Taxonomy regulation accompanies the SFDR and aims to create consistent standards through enhanced transparency and providing an objective point of comparison to end investors on the proportion of investments that fund environmentally sustainable economic activities.

These measures are in response to the signing of the Paris Agreement, and the United Nations 2030 Agenda for Sustainable Development of 2015 which created the Sustainable Development Goals (UNSDGs). The SFDR and other regulations are also aligned with the European Green Deal, which targets the EU being carbon neutral by 2050.

The transition to a low-carbon, more sustainable, resource-efficient, and circular economy in line with the SDGs is key to ensuring long - term competitiveness of the economy of the Union. The Paris Agreement entered into force in 2016 and seeks to strengthen the response to climate change by making finance flows consistent with a pathway towards low greenhouse gas emissions and climate - resilient development.

## Fidelity International and Sustainable Investing

### General approach to sustainable investing

Fidelity's Sustainable Investing approach may be found on <https://fidelityinternational.com/sustainable-investing-framework/>. The Sustainable Investing Principles document sets out details of Fidelity's approach to sustainable investing, including Fidelity's expectations of investee issuers, ESG integration and implementation, approach to engagement and voting, exclusion and divestment policy and focus on collaboration and policy governance.

All funds managed by the Investment Manager are subject to a firm-wide exclusions list, which includes, but is not limited to, cluster munitions and anti-personnel landmines.

### SUSTAINABILITY RISK

Fidelity considers Sustainability Risks across all asset classes and funds, unless otherwise stated. Sustainability Risks refers to an environmental (E), social (S) or governance (G) (collectively, "ESG") event, or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

Fidelity's approach to Sustainability Risk integration seeks to identify and assess the ESG risks at an individual issuer level. Sustainability Risks which may be considered by Fidelity's investment teams include, but are not limited to:

- environmental risks: the ability of companies to mitigate and adapt to climate change and the potential for higher carbon prices, exposure to increasing water scarcity and potential for higher water prices, waste management challenges, and impact on global and local ecosystems;
- social risks: product safety, supply chain management and labour standards, health and safety and human rights, employee welfare, data & privacy concerns and increasing technological regulation; and

- governance risks: board composition and effectiveness, management incentives, management quality and alignment of management with shareholders.
- Fidelity's portfolio managers and analysts supplement the study of financial results of potential investments with additional qualitative and quantitative non-financial analysis including Sustainability Risks and will factor them into investment decision making and risk monitoring to the extent they represent potential or actual material risks and/or opportunities to maximise long-term risk-adjusted returns. This systematic integration of Sustainability Risks in investment analysis and decision-making relies on:
- "qualitative assessments", which will be by reference, but not limited, to case studies, environmental, social and governance impacts associated with issuers, product safety documents, customer reviews, company visits or data from proprietary models and local intelligence; and
  - "quantitative assessments", which will be by reference to ESG ratings which may be from external providers, including but not limited to MSCI, or an internal rating assigned by the Investment Manager primarily using Fidelity ESG Rating(s) (described below), relevant data in third-party certificates or labels, assessment reports on carbon footprints, or percentage of revenue or profits of issuers generated from ESG-relevant activities.

### SUSTAINABILITY RATINGS AND PRINCIPAL ADVERSE IMPACTS

Fidelity ESG Rating(s) is a proprietary ESG rating system developed by Fidelity's research analysts to assess individual issuers. The ratings score issuers on an A-E scale on sector-specific factors, which include relevant principal adverse impact indicators, and a trajectory forecast based on an assessment of expected change of an issuer's sustainability characteristics over time. The ratings are based on fundamental bottom-up research and assessment using criteria specific to the industry of each issuer relevant to material ESG issues. Any material differences between Fidelity ESG Rating(s) and third party ESG ratings contribute to analysis and discussion within Fidelity's investment teams as part of the assessment of the investment opportunity and its related ESG risks. ESG ratings and associated ESG data are maintained on a centralised research platform operated by the Investment Manager. The provision and sourcing of ESG data is reviewed on a regular basis to ensure its continuing suitability, adequacy, and effectiveness for the ongoing assessment of Sustainability Risks.

Fidelity's Multi Asset Research team aim to understand an individual manager's approach to ESG by evaluating how far ESG considerations are integrated within the investment process and philosophy, the analyst's financial analysis and the composition of the portfolio. They consider how ESG factors are integrated into the investment policy of the strategy, and, where proprietary ratings are used, how ESG research and output is evidenced in individual security weights and any applicable engagement and exclusion policies. The team consults a range of data sources, including Fidelity ESG Rating(s) as well as third-party data, in order to assess the ESG metrics of the relevant strategies.

### TAXONOMY

Where a fund is identified as subject to the disclosure requirements of the SFDR, such fund is required by the EU Taxonomy Regulation (EU) 2020/852 (the "Taxonomy Regulation") to state that 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 the fund do not take into account the EU criteria for environmentally sustainable economic activities.

Where a fund is identified as subject to the disclosure requirements of article 8 or article 9 of the SFDR, the information required to be disclosed in accordance with the Taxonomy Regulation is set out in the specific fund's Sustainability Annex.

Where a fund is not identified as subject to the disclosure requirements of article 8 or article 9 of the SFDR, the fund is subject to Article 7 of the Taxonomy Regulation and the investments underlying such a fund do not take into account the EU criteria for environmentally sustainable economic activities.

**SHAREHOLDER ENGAGEMENT**

As part of Fidelity's commitment to sustainable investing and enacting Fidelity's fiduciary responsibility, as shareholders Fidelity engages with the companies in which it invests to encourage sustainable and responsible corporate behaviour.

**PRINCIPAL ADVERSE IMPACTS**

Fidelity International considers that principal adverse impacts on sustainability factors are those impacts of our investment decisions that result in material negative impacts on environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters such as environment degradation, poor labour practice, and unethical corporate behaviour for example bribery and corruption. Analysis of relevant principal adverse impacts is integrated in our investment process as described below.

Principal adverse impacts ("PAIs") on sustainability factors are considered by those funds that comply with the disclosure requirements of SFDR Article 8 and 9.

For those funds that consider PAIs, information on PAIs on sustainability factors is available in the specific fund's Sustainability Annex and in the next annual report of the funds.

In the case of funds which are not identified as subject to the disclosure requirements of SFDR Article 8 or 9, the PAIs on sustainability factors are not considered as this is not part of the strategy or investment restrictions of these funds.

The general approach for sustainability risk integration in the investment process set out above applies to all funds within Fidelity Active STstrategy.

**SFDR ARTICLE 8 AND 9 FUNDS**

Funds which promote among other characteristics, environmental and/or social characteristics (SFDR Article 8) or which have sustainable investment as their investment objective (SFDR Article 9), integrate ESG considerations into their investment processes and are subject to stricter sustainability and enhanced disclosure requirements, as described below.

Funds which comply with the disclosure requirements of SFDR Article 9 must make sustainable investments and funds which comply with the disclosure requirements of SFDR Article 8 may make sustainable investments.

In accordance with Fidelity's Sustainable Investing Framework, Sustainable Investments are determined as investments in:

- (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;
- (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");
- (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 that such investment does not significantly harm any other environmental or social objectives and that the investee companies follow good governance practices.

Further details on the methodology applied are set out in the Sustainable Investing Principles document which is available at

[Sustainable investing framework \(fidelityinternational.com\)](https://www.fidelityinternational.com/sustainable-investing-framework) and may be updated from time to time.

The SDGs are a series of goals published by the United Nations which recognise that ending poverty and other deprivations must go hand-in-hand with improvements in health and education, economic growth, and a reduction in inequalities, all while tackling climate change and working to preserve the planet's oceans and forests. For further details see the UN website: <https://sdgs.un.org/goals>. Environmentally focused SDGs include clean water and sanitation; affordable and clean energy; responsible consumption and production; and climate action. Socially focused SDGs include no poverty; zero hunger; economic growth and productive employment; industry, innovation and infrastructure; safe and sustainable cities and communities.

**1. FUNDS WHICH PROMOTE ENVIRONMENTAL OR SOCIAL CHARACTERISTICS (SFDR ARTICLE 8)**

Where provided for in their investment objective, certain funds may seek to achieve their investment objectives while promoting, among other characteristics, environmental or social characteristics, or a combination of those characteristics. The criteria for this approach are set out below and apply to all article 8 funds of the SFDR. Article 8 funds fall into two categories:

**(a) Funds which promote environmental and social characteristics**

The Investment Manager considers a wide range of environmental and social characteristics on an ongoing basis for each fund, as set out below or in each relevant fund's investment objective, but the Investment Manager has the discretion to implement enhanced, stricter sustainable requirements and exclusions (in addition to the firm wide exclusions list referenced above) from time to time. Additional exclusions applied to each fund are set out at [Sustainable investing framework \(fidelityinternational.com\)](https://www.fidelityinternational.com/sustainable-investing-framework).

A minimum of 50% of a fund's net assets are invested in securities with favourable ESG characteristics.

Favourable ESG characteristics are established by reference to ESG ratings provided by external agencies or Fidelity ESG Rating(s). Further details on the methodology applied are set out at [Sustainable investing framework \(fidelityinternational.com\)](https://www.fidelityinternational.com/sustainable-investing-framework) and may be updated from time to time.

The norms-based screening includes issuers which the Investment Manager considers have failed to conduct their business in accordance with accepted international norms, including as set out in the United Nations Global Compact.

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

Each fund will consider a wide range of environmental and social characteristics on an ongoing basis. Environmental characteristics include carbon intensity, carbon emissions, energy efficiency, water and waste management, biodiversity, while social characteristics include product safety, supply chain, health and safety and human rights. Environmental and social characteristics are analysed by Fidelity's fundamental analysts and rated through Fidelity ESG Rating(s).

In the case of multi asset funds which promote environmental and social characteristics, a different methodology may be applied. Please see the Investment Objective and Policy and the Sustainability Annex of the relevant fund for further details.

**(b) Fidelity Sustainable Family of Funds**

Certain funds are part of the Fidelity Sustainable Family, a dedicated fund range exhibiting enhanced sustainable characteristics. This is noted in the investment objective of the relevant funds. All the funds in the Fidelity Sustainable Family comply with the Fidelity Sustainable Family Framework, as detailed below. Fund specific additional requirements will also be set out in the relevant investment objective, where applicable. The Investment Manager for funds in the Fidelity Sustainable Family also has discretion to implement additional sustainable

requirements and exclusions having regard to their applicable investment process from time to time.

A minimum of 70% of a fund's net assets are invested in securities deemed to maintain favourable ESG characteristics.

ESG characteristics are determined by reference to ESG ratings provided by Fidelity ESG Rating(s) or external agencies. Favourable ESG characteristics means a Fidelity ESG Rating(s) of at least C or the equivalent as assessed by an external agency. Further details on the methodology applied are set out at <https://fidelityinternational.com/sustainable-investing-framework/accordingly> and may be updated from time to time.

A maximum of 30% of a fund's net assets are allowed in issuers that are not deemed to maintain favourable ESG characteristics in accordance with the criteria above, but which demonstrate improving sustainable indicators. Improving sustainable indicators are issuers classified as such through the trajectory outlook of Fidelity ESG Rating(s) or issuers which in the view of the Investment Manager demonstrate the potential for improvement through the implementation and execution of a formal engagement plan. The criteria used to determine this reference rating may change over time and will be updated at [Sustainable investing framework https://fidelityinternational.com/sustainable-investing-framework/accordingly](https://fidelityinternational.com/sustainable-investing-framework/accordingly).

Funds adhere to an enhanced principle-based exclusion policy incorporating both norms-based screening and negative screening of certain sectors, companies or practices based on specific ESG criteria to be determined by the Investment Manager from time to time.

The norms-based screening includes issuers which the Investment Manager considers have failed to conduct their business in accordance with accepted international norms, including as set out in the United Nations Global Compact.

The negative screening includes issuers which have exposure, or ties, to:

controversial weapons (biological, chemical, incendiary weapons, depleted uranium, non-detectable fragment, blinding lasers, cluster munitions, landmines and nuclear weapons);

production of conventional weapons (a weapon of warfare which is not nuclear, chemical or biological in nature);

production of semi-automatic firearms intended for sale to civilians or sale of semi-automatic firearms to civilians;

tobacco production, retailing, distribution and licensing;

thermal coal extraction and power generation provided that such will be permitted issuers where the revenue share from renewable energy activities exceeds the revenue share from thermal coal activities or where the issuer has made an effective commitment to a Paris Agreement aligned objective based on approved Science Based Targets or alignment with a Transition Pathway Initiative scenario or a reasonably equivalent public commitment;

extraction of oil sands; or

production of arctic oil and gas, onshore and offshore.

The Investment Manager may apply revenue thresholds for more refined screens.

A list of additional negative screens that are applied to each fund is set out at [Sustainable investing framework \(fidelityinternational.com\)https://fidelityinternational.com/sustainable-investing-framework/](https://fidelityinternational.com/sustainable-investing-framework/) and may be updated from time to time.

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

Unless otherwise set out in the investment objective of some 'Sustainable Thematic' funds, each fund will consider a wide range of environmental and social characteristics on an ongoing basis. Environmental characteristics include carbon intensity, carbon emissions, energy efficiency, water and waste management and biodiversity, while social characteristics include, product safety, supply chain, health and safety and human rights. Controversies involving environmental and social characteristics are regularly monitored. Environmental and

social characteristics are analysed by Fidelity's fundamental analysts and rated through Fidelity ESG Rating(s). These funds seek to promote these characteristics by adhering to the Fidelity Sustainable Family Framework.

The Fidelity Sustainable Family range offers two investment categories: 'Sustainable Focused' and 'Sustainable Thematic'. Typically, the Sustainable Focused funds will actively seek to select companies that are higher sustainability performers relative to peers with reference to Fidelity ESG Rating(s) or MSCI ESG Ratings and, while the Sustainable Thematic funds will invest across sectors relating to a common theme with a long-term investment horizon by aiming to address sustainability challenges.

**2. FUNDS WHICH HAVE SUSTAINABLE INVESTMENT AS THEIR OBJECTIVE (SFDR ARTICLE 9)**

These funds are required to pursue a sustainable investment objective.

- The funds aim to make sustainable investments.
- Sustainable investments are determined in line with the criteria set out above, in the section "SFDR ARTICLE 8 AND 9 FUNDS".

- The funds may, on an ancillary basis, invest in investments, including cash, for hedging or liquidity purposes or for efficient portfolio management and where required to do so under sector specific rules, provided that such investments do not affect delivery of the sustainable investment objective.

- All investments in the fund are screened for activities causing principal adverse impact on environmental or social objectives and governance controversies. These screens are based on an enhanced principle-based exclusion policy incorporating both norms-based screening and negative screening of certain sectors, companies or practices based on specific ESG criteria determined by the Investment Manager from time to time.

The norms-based screening includes issuers which the Investment Manager considers have failed to conduct their business in accordance with accepted international norms, including as set out in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, UN Global Compact (UNGC), International Labour Organisation (ILO) Conventions.

The negative screening includes issuers which have exposure, or ties, to:

- controversial weapons (biological, chemical, incendiary weapons, depleted uranium, non-detectable fragment, blinding lasers, cluster munitions, landmines and nuclear weapons);

- production of conventional weapons (a weapon of warfare which is not nuclear, chemical or biological in nature);

- production of semi-automatic firearms intended for sale to civilians or sale of semi-automatic firearms to civilians;

- tobacco production, retailing, distribution and licensing; or

- thermal coal extraction and power generation provided that such will be permitted issuers where the revenue share from renewable energy activities exceeds the revenue share from thermal coal activities or where the issuer has made an effective commitment to a Paris Agreement aligned objective based on approved Science Based Targets or alignment with a Transition Pathway Initiative scenario or a reasonably equivalent public commitment;

- extraction of oil sands; or

- production of arctic oil and gas, onshore and offshore.

The Investment Manager may apply revenue thresholds for more refined screens.

- A list of additional negative screens that are applied to each fund is set out at <https://fidelityinternational.com/sustainable-investing-framework/> and may be updated from time to time.

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

# Benchmark Policies

## BENCHMARK USAGES

The usages stated in “Fund Descriptions” have the following meanings:

- **Risk monitoring** For monitoring the fund’s risks and, in case of relative value-at-risk funds, calculating maximum relative underperformance. See “Management and monitoring of global risk” and “Relative Value-at-Risk (Relative VaR)”
- **Investment selection** For defining the fund’s investment universe and selecting securities.
- **Performance comparison** For assessing the fund’s performance against the benchmark.
- **Carbon footprint/ESG comparison** For assessing the fund’s ESG characteristics against the benchmark.
- **Outperformance** For measuring whether a fund that has an objective to outperform its benchmark is doing so.
- **Performance fee calculation** For calculating the fund’s outperformance. See “Fund Fees and Costs”.
- **Tracking** For replicating the composition of the benchmark and measuring performance differences (passive investment strategies only).

# Credit Policies

The Investment Manager assesses credit quality according to the references and methods described below.

For bonds, credit ratings are considered at the security or issuer level and at the time of securities’ purchases. The funds may hold securities that have been downgraded.

For bonds and money market instruments, the Management Company only uses ratings of credit agencies established and registered in the EU. The Management Company does its own credit analysis and does not solely rely on agency credit ratings.

## INVESTMENT GRADE BONDS (AAA/AAA TO BBB-/BAA3) AND BELOW INVESTMENT GRADE BONDS (BB+/BA1 OR LOWER)

These securities must be rated by Standard & Poor’s or another internationally recognised rating agency. If ratings disagree, we use the second-highest rating.

## ASSETS HELD BY MONEY MARKET FUNDS

When assessing money market instruments, securitisations and asset-backed commercial papers for money market funds (as defined and regulated by Regulation (EU) 2017/1131) to determine whether their credit quality receives a favourable assessment, the Management Company reviews agency credit ratings and also applies its own internal credit quality assessment procedure using up-to-date quality information from other reliable sources.

This procedure is based on prudent, systematic and continuous assessment methodologies that take into account the characteristics of both issuer and instrument and has been validated by experience and empirical evidence, including back-testing.

## BENCHMARK REGULATION

Under the benchmark regulation (EU regulation 2016/1011), any benchmarks the funds use, including elements of composite benchmarks, must be appropriately registered with the European Securities and Markets Authority (ESMA).

For index providers based in the EU, or in a non-EU country recognised as equivalent for registration purposes, registration must be at the provider level. Index providers in other countries must register individual indices. Those who are not yet registered are indicated in the Fund Descriptions.

The SICAV maintains written contingency plans for how it would address situations where a benchmark ceases to be offered or to be covered by registration, or where, either through changes in a benchmark or a fund, an existing benchmark ceases to be appropriate. In some cases, the response may involve a change to a fund’s strategy or investment policy, or the merger or termination of the fund. Details are available free of charge upon request at the registered office of the SICAV.

The procedure includes criteria to analyse financial data, identify trends, and track key determinants of credit risk. The Management Company supervises the application of the procedure by a team of credit research analysts and regularly monitors the procedure for accuracy, adequacy and proper execution, making adjustments to the relative importance of the assessment criteria from time to time. The procedure complies with articles 19.4 and 20.2 of Regulation (EU) 2017/1131 and is approved by the management company’s conducting officers and subsequently by the management company’s directors.

The internal assessment procedure relies on numerous indicators. Examples of quantitative criteria include pricing of money market instruments and credit default swaps; monitoring of relevant financial indices covering geographical, sector, and asset class; and industry-specific financial and default information. Examples of qualitative criteria include the competitive position, governance risk, financial situation and liquidity sources of the issuer; the issuer’s ability to react to future events; the strength of the issuer’s sector within the economy and relative to economic trends; and the class, structure, short-term characteristics, underlying assets, liquidity profile, relevant markets, and potential operational and counterparty risks of the instrument. According to article 21 of Regulation (EU) 2017/1131, the Management Company documents its internal credit quality assessment procedure and credit quality assessments.



# Risk Descriptions

All investments involve risk. The risks of some of these funds may be comparatively high.

The risk descriptions below correspond to the main risk factors listed for each fund. A fund could potentially be affected by risks beyond those listed for it or described here, nor are these risk descriptions themselves intended as exhaustive. Each risk is described as for an individual fund.

Any of these risks could cause a fund to lose money, to perform less well than similar investments or a benchmark, to experience high volatility (ups and downs in NAV), or to fail to meet its objective over any period of time.

**ACTIVE MANAGEMENT RISK** The Investment Managers could be wrong in their analysis of market or economic trends, their choice or design of any software models they use, their allocation of assets, or in other investment decisions.

Investment management practices that have worked well in the past, or are accepted ways of addressing certain conditions, could prove ineffective.

**ASSET ALLOCATION RISK** The fund is subject to the risks of all asset classes included in its asset allocation. To the extent that patterns of correlation or non-correlation among asset classes do not behave as expected, the fund may experience greater volatility or losses than it otherwise would have.

**BENCHMARK ORIENTATION RISK** The aim of an index tracking fund is to match the performance of an index as closely as possible. However, there is the risk that an index tracking fund's performance may not track that of the underlying index exactly. The Investment Manager will monitor and seek to manage such risk in minimising tracking difference. There can be no assurance of exact or identical replication at any time of the performance of the index

Market indexes, which are typically used as benchmarks, are calculated by independent entities without consideration for how they may affect fund performance. The index providers make no guarantee that their index calculations are accurate and assume no liability for any losses of investors in any investment that tracks any of their indexes. If a provider ceases to maintain an index or loses or fails to gain its ESMA registration as a benchmark provider, the fund may be liquidated if no suitable replacement can be found.

**CHINA RISK** The legal rights of investors in mainland China are uncertain, government intervention is common and unpredictable, some of the major trading and custody systems are unproven, and all types of investments are likely to have comparatively high volatility and greater liquidity and counterparty risks.

In mainland China, it is uncertain whether a court would protect the fund's right to securities it may purchase via Stock Connect programs, China Interbank Bond Market or other methods whose regulations are untested and subject to change. The structure of these schemes does not require full accountability of some of its component entities and leaves investors such as the fund with relatively little standing to take legal action in mainland China.

In addition, Chinese security exchanges or authorities may tax or limit short-swing profits, recall eligible stocks, set or change quotas (maximum trading volumes, either at the investor level or at the market level) or otherwise block, limit, restrict or delay trading, hampering or preventing a fund from implementing its intended strategies.

Funds that are specifically allowed by their investment objective or are permitted by country specific requirements under 'Additional voluntary requirements' to make investments in China A Shares and/or onshore China fixed income securities, such

investments may, be made through the Qualified Foreign Investor (QFI) status of FIL Investment Management (Hong Kong) Limited, the Stock Connect, the China Interbank Bond Market (CIBM) direct access scheme, the Bond Connect and/or any permissible means available to the funds under prevailing laws and regulations

Investments in domestic securities of the PRC denominated in CNY are made through the QFI status or through the Hong Kong Stock Connect Programmes, which are subject to daily and aggregate quotas.

Funds may indirectly invest In China A Shares through China A share access products including, but not limited to, equity linked notes, participation notes, credit-linked notes or funds investing in China A Shares.

**QFI status.** Unless otherwise stated in the investment objective of a fund, a fund may invest less than 70% in China securities using the license of a qualified foreign institutional investor under the QFI program. Investing through a QFI license has risks. For example, the QFI status could be suspended, reduced or revoked, which may affect the fund's ability to invest in eligible securities or require the fund to dispose of such securities and this could have an adverse effect on the fund's performance. QFI Regulations impose strict restrictions on investments (including rules on investment restrictions, minimum holding period and repatriation of capital or profits) that are applicable to the Investment Manager as well as to the investments made by the fund. It is uncertain whether a court would protect the fund's right to securities held for it by a licensed QFI if the QFI came under legal, financial or political pressure.

**Shanghai and Shenzhen Hong Kong Stock Connect programs.** Stock Connect is a joint project of the Hong Kong Exchanges and Clearing Limited (HKEX), China Securities Depository and Clearing Corporation Limited (ChinaClear), the Shanghai Stock Exchange and the Shenzhen Stock Exchange. Hong Kong Securities Clearing Company Limited (HKSCC), a clearing house that in turn is operated by HKEX, acts as nominee for investors accessing Stock Connect Securities.

Creditors of the nominee or custodian could assert that the assets in accounts held for the funds are actually assets of the nominee or custodian. If a court should uphold this assertion, creditors of the nominee or custodian could seek payment from the assets of the relevant fund. HKSCC, as nominee, does not guarantee the title to Stock Connect securities held through it and is under no obligation to enforce title or other rights associated with ownership on behalf of beneficial owners (such as the funds). Consequently, title to such securities, or the rights associated with them (such as participation in corporate actions or shareholder meetings), cannot be assured.

Should the SICAV or any fund suffer losses resulting from the performance or insolvency of HKSCC, the SICAV would have no direct legal recourse against HKSCC, because Chinese law does not recognise any direct legal relationship between HKSCC and either the SICAV or the depository.

Should ChinaClear default, HKSCC's contractual liabilities will be limited to assisting participants with claims. A fund's attempts to recover lost assets could involve considerable delays and expenses and may not be successful.

**China Interbank Bond Market CIBM and Bond Connect.** These markets provide a way for outside investors (such as the fund) to buy Chinese bonds. The CIBM may have low trading volumes, which may cause liquidity risk and may cause the fund to miss out on investment opportunities. Although Bond Connect removes the CIBM's investment quota and the need for a bond settlement agent, some bonds may still have low trading volumes, investments made through either channel may have high price

volatility and there may be large spreads between bid and offer prices, limiting the ability to make profitable investments.

**ChiNext Market and Shanghai Stock Exchange Science & Technology Innovation Board (STAR board).** Certain funds may have exposure to stocks listed on ChiNext market of the SZSE and/or the STAR board of the SSE. *Higher fluctuation on stock prices and liquidity risk* - ChiNext market and/or STAR board are usually emerging in nature with smaller operating scale. In particular, listed companies on ChiNext market and/or STAR board are subject to wider price fluctuation limits, and due to higher entry thresholds for investors, may have limited liquidity compared to other boards. Hence, companies listed on these boards are subject to higher fluctuation in stock prices and liquidity risks and have higher risks and turnover ratios than companies listed on the main boards of the SZSE and/or the SSE. *Overvaluation risk* -, ChiNext market and/or STAR board may be overvalued and such exceptionally high valuation may not be sustainable. Stock price may be more susceptible to manipulation due to fewer circulating shares. *Differences in regulation* - the rules and regulations regarding companies listed on ChiNext market and STAR board are less stringent in terms of profitability and share capital than those in the main boards of the SZSE and/or the SSE. *Delisting risk* - it may be more common and faster for companies listed on the ChiNext market and/or STAR board to delist. In particular, ChiNext market and STAR board have stricter criteria for delisting compared to other boards. This may have an adverse impact on the relevant fund if the companies that it invests in are delisted. *Concentration risk* - the STAR board is a newly established board and may have a limited number of listed companies during the initial stage. Investments in the STAR board may be concentrated in a small number of stocks and subject the relevant fund to higher concentration risk. Investments in the, ChiNext market and/or STAR board may result in significant losses for the relevant fund and its investors

**Dim Sum bonds.** Some funds may invest in "Dim Sum" bonds (i.e. bonds issued outside of mainland China but denominated in RMB). The "Dim Sum" bond market is a relatively small market. As with some global fixed income markets, it may be more susceptible to volatility and illiquidity, and should there be any new rules which limit or restrict the ability of issuers to raise RMB (offshore CNH) funding by way of bond issuance and/or reversal or suspension of the liberalization of the CNH market by the relevant regulator(s), the operation of the "Dim Sum" bond market and new issuances could be disrupted and potentially cause a fall in the Net Asset Value of the relevant funds

**Onshore and offshore renminbi.** In mainland China, the government maintains two separate currencies: onshore renminbi (CNY), which must remain within mainland China and generally cannot be owned by foreigners, and offshore renminbi (CNH), which can be owned by any investor. The exchange rate between the two, and the extent to which currency exchanges involving CNH are allowed, are managed by the government, based on a combination of market and policy considerations.

**Credit ratings.** A fund may invest in securities the credit ratings of which are assigned by mainland China local credit rating agencies. However, the rating criteria and methodology used by such agencies may be different from those adopted by most of the established international credit rating agencies. Therefore, such rating system may not provide an equivalent standard for comparison with securities rated by international credit rating agencies.

**Urban Investment Bonds** Risks of Urban Investment Bonds, which are issued by Local Government Financing Vehicles (LGFVs) to raise financing for public welfare investment or infrastructure projects include the risk of financial difficulties of the underlying operations.

**PRC tax provision.** The Management Company reserves the right to provide for appropriate Chinese tax on gains of any fund that invests in PRC securities thus impacting the valuation of the fund. With the uncertainty over whether and how certain gains on PRC securities are to be taxed, coupled with the possibility of the laws, regulations and practice in the PRC changing, and also the possibility of taxes being applied retrospectively, any provision for taxation made by the Management Company may be excessive or inadequate to meet final PRC tax liabilities on gains derived from the disposal of PRC securities. Consequently, investors may be advantaged or disadvantaged depending upon the final outcome of how such gains will be taxed, the level of provision and when they subscribed and/or redeemed their shares in the funds.

This effectively creates currency risk within a single nation's currency, as well as liquidity risk, since the conversion of CNY to CNH, and of CNH to other currencies, can be restricted, as can the removal of any currency from mainland China or Hong Kong.

**COCO BONDS RISK** Contingent convertible securities (CoCo bonds) are comparatively untested, more vulnerable to losses than equities, carry extension risk, can be highly volatile, and their issuers can cancel or modify scheduled income payments at will.

A CoCo bond can be junior not only to other debt obligations but to equity holders as well. It can also lose some or all of its value instantaneously in case of a write-down or if a trigger event occurs; for example, the trigger could be activated either through a loss of capital (numerator) or an increase in risk-weighted assets (denominator). Because CoCo bonds are in effect perpetual loans, the principal amount may be paid off on the call date, anytime afterward, or never. CoCo bonds can also have liquidity risk and can be difficult to value.

How CoCo bonds will behave in various market situations is unknown, but there is a risk that volatility or price collapses could spread across issuers and that the bonds could become illiquid. This risk could be worse to the extent that CoCo bond issues may be concentrated in certain industries rather than being evenly distributed across many industries and could also be worse depending on the level of underlying instrument arbitrage.

In case of conversion into equity, the Investment Manager would be forced to sell any new equity shares if the fund's investment policy does not permit equities; this could involve liquidity risk. While CoCo bonds tend to offer attractive yields, any assessment of their risk must include not only their credit ratings (which may be below investment grade) but also the other risks associated with CoCo bonds, such as the risk of conversion, coupon cancellation, and liquidity risk. It also remains unclear whether investors have accurately assessed the risks of CoCo bonds, meaning that a widespread market event affecting CoCo bonds could permanently depress the overall market for CoCo bonds.

**COMMODITIES RISK** Commodities tend to be highly volatile, and may be disproportionately affected by political, economic, weather, trade, agricultural and terrorist-related events, and by changes in energy and transportation costs.

Because they respond to specific factors, commodity prices may behave differently from each other and from equities, bonds, and other common investments.

**CONCENTRATION RISK** To the extent that the fund invests a large portion of its assets in a limited number of industries, sectors, or issuers, or within a limited geographical area, it can be more risky than a fund that invests more broadly.

Focusing on any company, industry, sector, country, region, type of stock, type of economy, etc. makes the fund more sensitive to the factors that determine market value for the area of focus. These factors may include economic, financial or market conditions as well as social, political, economic, environmental, or other

conditions. The result can be both higher volatility and a greater risk of loss.

**CONVERTIBLE SECURITIES RISK** Because convertible securities are structured as bonds that typically can, or must, be repaid with a predetermined quantity of equity shares, rather than cash, they carry both equity risk and the credit and default risks typical of bonds.

**COUNTERPARTY AND COLLATERAL RISK** Any entity with which the fund does business, including the depository, could become unwilling or unable to meet its obligations to the fund.

Agreements with counterparties, such as through the use of securities lending, can involve liquidity risk and operational risk, either of which could cause losses and could limit the fund's ability to meet redemption requests, meet other payment obligations or invest the assets in question.

Under any of the following circumstances, the fund could lose some or all of its money, or could experience delays in getting back securities or cash that are held by the counterparty (which could also cause losses):

- a depository, sub-custodian, broker, or other counterparty becomes bankrupt or defaults on obligations; in some cases, the depository may not be able to remedy, or have liability for, the actions of a sub-custodian it has appointed
- a serious natural or human-caused disaster, terrorist act, civil unrest, war or other "force majeure" event occurs (since in such cases counterparties typically are not liable for losses)
- in some jurisdictions, collateral agreements (even those using industry-standard language) could prove difficult or impossible to enforce

Under any of the following circumstances, the value of collateral might not cover the full value of a transaction, or any fees or returns owed to the fund:

- the collateral declines in value; this risk is greatest when there is a material delay in the return of assets by the counterparty, but during times of market volatility it can occur even during the short lag between when the placement and settlement of a collateral-related transaction, or between when the need for collateral is calculated and when the fund receives the collateral
- the collateral yields less income than anticipated
- the fund or a counterparty has mispriced the collateral
- collateral that is used to cover a counterparty's default may take time to liquidate

For any cash collateral the fund invests, the circumstances immediately above could also create leverage (and consequently volatility) or expose the fund to assets inconsistent with its objective.

**CREDIT RISK** A bond or money market instrument could fall in price, and become more volatile and less liquid, if the credit quality of the issuer or the security declines, or the market believes it might. In extreme cases a debt investment could go into default, meaning its issuer could become unable to make timely payments to the fund.

Adverse effects of environmental issues, such as climate change and natural disasters, may erode the financial health of a bond issuer.

**CURRENCY RISK** To the extent that the fund holds assets that are denominated in currencies other than the base currency, any changes in currency exchange rates could reduce investment gains or income, or increase investment losses, in some cases significantly.

Exchange rates can change rapidly and unpredictably, and it may be difficult for the fund to unwind its exposure to a given currency in time to avoid losses.

Changes in exchange rates can be influenced by such factors as export-import balances, economic and political trends, governmental intervention, and investor speculation.

In addition, shareholders may experience currency risk if the currency in which they subscribe or redeem is different to the base currency of the fund. Changes in currency exchange rates between the base currency and the share class currency can reduce investment gains or income, or increase investment losses, in some cases significantly.

Intervention by a central bank, such as aggressive buying or selling of currencies, changes in interest rates, restrictions on capital movements or a "de-pegging" of one currency to another, could cause abrupt or long-term changes in relative currency values.

**DERIVATIVES RISK** The value of derivatives can be volatile. Small movements in the value of an underlying asset can create large changes in the value of a derivative and expose the fund to losses that could be greater than the cost of the derivative itself.

A fund may use derivatives for various reasons, such as hedging, efficient portfolio management and other investment purposes. Derivatives are specialized instruments that require investment techniques and risk analyses different from those associated with traditional securities.

Derivatives are subject to the risks of the underlying asset(s) – typically in modified and greatly amplified form – as well as carrying their own risks. Some of the main risks of derivatives are:

- the pricing and volatility of some derivatives, in particular credit default swaps and collateralised debt obligations, may diverge from the pricing or volatility of their underlying reference(s), sometimes greatly and unpredictably
- in difficult market conditions, it may be impossible or unfeasible to place orders that would limit or offset the market exposure or financial losses created by some derivatives
- derivatives involve costs that the fund would not otherwise incur
- it can be difficult to predict how a derivative may behave in certain market conditions; this risk is greater for newer or more complex types of derivatives
- changes in tax, accounting, or securities laws or standards could cause the value of a derivative to fall or could force the fund to terminate a derivative position under disadvantageous circumstances
- some derivatives, in particular futures, options, total return swaps, and contracts for difference may involve margin borrowing, meaning that the fund could be forced to choose between liquidating securities to meet a margin call or taking a loss on a position that might, if held longer, have yielded a smaller loss or a gain

**Exchange-traded derivatives.** Trading in these derivatives or their underlying assets could be suspended or subject to limits. There is also a risk that settlement of these derivatives through a transfer system may not happen when or as expected.

**OTC derivatives – non-cleared.** Because OTC derivatives are in essence private agreements between a fund and one or more counterparties, they are less highly regulated than market-traded securities. They also carry greater counterparty and liquidity risks, and their pricing is more subjective. If a counterparty ceases to offer a derivative that a fund had been planning on using, the fund may not be able to find a comparable derivative elsewhere and may miss an opportunity for gain or find itself unexpectedly exposed to risks or losses, including losses from a derivative position for which it was unable to buy an offsetting derivative.

Because it is generally impractical for the SICAV to divide its OTC derivative transactions among a wide variety of counterparties, a decline in the financial health of any one counterparty could cause significant losses. Conversely, if any fund experiences any financial weakness or fails to meet an obligation, counterparties could

become unwilling to do business with the SICAV, which could leave the SICAV unable to operate efficiently and competitively.

**OTC derivatives – cleared.** Because these derivatives are cleared on a trading platform, their liquidity risks are similar to those for exchange-traded derivatives. However, they still carry counterparty risk that is similar to non-cleared OTC derivatives.

**DISTRESSED SECURITIES RISK** Some of the funds may hold distressed securities or, may, in accordance with their respective investment policies, invest in distressed securities. Distressed securities involve significant risk. Such investments are highly volatile and are made when the Investment Manager believes that such investments will yield an attractive return based on the level of discount on price compared to perceived fair value of the security, or where there is a prospect of the issuer making a favourable exchange offer or plan of reorganisation. There can be no assurances that an exchange offer or reorganisation will occur or that any securities or other assets received will not have a lower value or income potential than anticipated at the time of investment. In addition, a significant period may pass between the time at which the investment in Distressed Securities is made and the time that any such exchange, offer or plan of reorganisation is completed. Distressed securities may frequently not produce income while they are outstanding and there will be significant uncertainty as to whether fair value will be achieved or whether any exchange offer or plan of reorganisation will be completed. There may be a requirement for a fund to bear certain expenses which are incurred to protect and recover its investment in distressed securities, or which arise in the course of negotiations surrounding any potential exchange or plan of reorganisation. Furthermore, constraints on investment decisions and actions with respect to distressed securities due to tax considerations may affect the return realised on distressed securities. A fund's investments in distressed securities may include issuers with substantial capital needs or negative net worth or issuers that are, have been, or may become, involved in bankruptcy or reorganisation proceedings. A fund may be required to sell its investment at a loss or hold its investment pending bankruptcy proceedings.

**EMERGING MARKETS RISK** Emerging markets are less established, and more volatile, than developed markets. They involve higher risks, particularly market, credit, illiquid security, legal, custody, valuation, and currency risks, and are more likely to experience risks that in developed markets are associated with unusual market conditions.

Reasons for this higher level of risk include:

- political, economic, or social instability
- economies that are heavily reliant on particular industries, commodities or trading partners
- uncontrolled inflation
- high or capricious tariffs or other forms of protectionism
- quotas, regulations, laws, restrictions on repatriation of monies, or other practices that place outside investors (such as the fund) at a disadvantage
- changes in laws or failure to enforce laws or regulations, to provide fair or functioning mechanisms for resolving disputes or pursuing recourse, or to otherwise recognise the rights of investors as understood in developed markets
- excessive fees or trading costs, or outright seizure of assets
- excessive taxation or non-standard, poorly defined, frequently changing or capriciously enforced tax laws and practices
- inadequate reserves to cover issuer or counterparty defaults
- incomplete, misleading, or inaccurate information about securities and issuers
- non-standard or sub-standard accounting, auditing, or financial reporting practices

- markets that are small and have low trading volumes, and consequently can be vulnerable to liquidity risk and to manipulation of market prices
- arbitrary delays and market closures
- less developed market infrastructure that is unable to handle peak trading volumes
- fraud, corruption and error

In certain countries, securities markets may also suffer from impaired efficiency and liquidity, which may worsen price volatility and market disruptions.

To the extent that emerging markets are in different time zones from Luxembourg, the fund might not be able to react in a timely fashion to price movements that occur during hours when the fund is not open for business.

For purposes of risk, the category of emerging markets includes markets that are less developed, such as most countries in Asia, Africa, South America and Eastern Europe, as well as countries such as China, Russia and India that have successful economies but may not offer the highest levels of investor protection.

**EQUITIES RISK** Equities can lose value rapidly, and typically involve higher (often significantly higher) market risks than bonds or money market instruments.

If a company goes through bankruptcy or a similar financial restructuring, its equities may lose most or all of their value.

The price of an equity varies according to supply and demand and the market expectations about the company's future profitability, which may be driven by factors such as consumer demand, product innovation, actions of competitors, and how or whether a company chooses to address environmental, social and governance (ESG) factors.

Examples of ESG practices include mitigating the effects of extreme weather events, reducing environmental impacts, improving labour conditions, promoting workplace non-discrimination and establishing strong and transparent governance.

**HEDGING RISK** Any attempts to reduce or eliminate certain risks may not work as intended, and to the extent that they do work, they will generally eliminate potentials for gain along with risks of loss.

The fund may use hedging within its portfolio, and, with respect to any designated share classes, to hedge the currency exposure of the class. Hedging involves costs, which reduce investment performance. Therefore, with any share class that involves hedging both at the fund level and the share class level, there can be two levels of hedging, some of which may yield no benefit (for example, at the fund level, a fund may hedge SGD-denominated assets to EUR, while an SGD-hedged share class of this fund would then reverse that hedge).

Risks related to share class currency hedging (such as counterparty risk) could affect investors of other share classes. For a list of funds with share classes that could experience contagion risk, go to [fidelityinternational.com](https://www.fidelityinternational.com).

**HIGH YIELD RISK** The values of high yield securities are speculative. Compared to investment grade bonds, high yield securities are more volatile, more sensitive to economic events, less liquid and carry greater default risk.

Foreign high yield securities generally include risks associated with international investing, such as currency risk due to differences in currencies.

**INTEREST RATE RISK** When interest rates rise, bond values generally fall. This risk is generally greater the longer a bond investment's duration.

For bank deposits and for money market instruments and other short-maturity investments, interest rate risk works in the opposite



direction. Falling interest rates can be expected to cause investment yields to fall.

**INVESTMENT FUND RISK** As with any investment fund, investing in the fund involves certain risks an investor would not face if investing in markets directly:

- the actions of other investors, in particular sudden large outflows of cash, could interfere with orderly management of the fund and cause its NAV to fall
- the investor cannot direct or influence how money is invested while it is in the fund
- to the extent that a fund uses its own valuation estimates (fair value) for securities, any error in valuation could affect NAV
- to the extent that a fund shifts non-cash assets into cash or money market instruments as a defensive move, the fund will miss out on any positive performance in the non-cash assets
- the fund is subject to various investment laws and regulations that limit the use of certain securities and investment techniques that might improve performance; to the extent that the fund decides to register in jurisdictions that impose investment requirements, this decision could further limit its investment flexibility and scope
- changes in regulations worldwide and increased regulator scrutiny of financial services could lead to new regulations or other changes that could limit opportunities or increase costs for the SICAV
- because fund shares are not publicly traded, the only option for liquidation of shares is generally redemption, which the fund can suspend for any of the reasons described in "Rights We Reserve" under "Investing in the Funds"
- the fund's buying and selling of investments may not be optimal for the tax efficiency of any given investor
- it may be impractical or impossible for different share classes to completely isolate their costs and risks from other share classes, including the risk that creditors of one share class of a fund may attempt to seize assets of another class to settle an obligation
- to the extent the SICAV conducts business with affiliates of FIL (Luxembourg) S.A., and these affiliates (and affiliates of other service providers) do business with each other on behalf of the SICAV, conflicts of interest may be created; to mitigate these, all such dealings must be conducted at arm's length, and all entities, and the individuals associated with them, are subject to strict fair dealing policies that prohibit profiting from inside information or showing favouritism
- to the extent that the fund invests in other UCITS or in UCIs, it could incur a second layer of fees (which will further erode any investment gains), could face liquidity risk in trying to unwind its investment in a UCITS/UCI, and is subject to all the risks listed above, making shareholders indirectly subject to them as well
- to the extent that the fund invests in cash or cash equivalents beyond its investment allocation (such as for defensive investing) the fund is not pursuing its goal and may not fully participate in positive market movements.

Where a fund invests in another UCITS or a UCI, these risks apply to the fund, and in turn indirectly to shareholders.

**LEVERAGE RISK** The fund's high net exposure to certain investments could make its share price more volatile.

To the extent that the fund uses derivatives or Securities lending to increase its net exposure to any market, rate, basket of securities or other financial reference source, fluctuations in the price of the reference source will be amplified.

**LIQUIDITY RISK** Any security could temporarily become hard to value or to sell at a desired time and price.

Liquidity risk could affect the fund's value and its ability to pay redemption proceeds or to repay, for example, repurchase agreement proceeds by the agreed deadline.

**MARKET RISK** Prices and yields of many securities can change frequently — sometimes with significant volatility — and can fall, based on a wide variety of factors.

Examples of these factors include:

- political and economic news
- government policy
- changes in technology and business practices
- changes in demographics, cultures and populations
- natural or human-caused disasters
- weather and climate patterns
- scientific or investigative discoveries
- costs and availability of energy, commodities and natural resources

The effects of market risk can be immediate or gradual, short-term or long-term, narrow or broad.

**OPERATIONAL RISK** In any country, but especially in emerging markets, the fund could suffer losses due to errors, service disruptions or other failures, as well as fraud, corruption, cyber crime, instability, terrorism or other irregular events.

Operational risks may subject the fund to errors affecting valuation, pricing, accounting, tax reporting, financial reporting, custody and trading, among other things. Operational risks may go undetected for long periods of time, and even if they are detected it may prove impractical to recover prompt or adequate compensation from those responsible.

**REAL ESTATE RISK** Real estate investment trusts (REITs) invest directly in physical real estate or related businesses, tend to have above-average volatility, and can be hurt by mortgage-related risks or by any factor that makes an area or individual property less valuable.

Specifically, investments in real estate holdings or related businesses or securities (including interests in mortgages) can be hurt by natural disasters, physical degradation, economic declines, overbuilding, zoning changes, tax increases, population or lifestyle trends, failures of management, difficulty attracting tenants or collecting payments, environmental contamination and other factors that may affect the market value or cash flow of the investment, including the failure of a REIT to qualify for tax-free pass-through of income.

Equity REITs are most directly affected by real estate factors, while mortgage REITs are more vulnerable to interest rate risk and credit risk (such as declines in the creditworthiness of the mortgage holders).

Many REITs are in effect small corporations and carry small- and mid-cap equity risk. Some are highly leveraged, which increases volatility. The value of real estate-related securities does not necessarily track the value of the underlying assets.

**RUSSIA RISK** In Russia and the Commonwealth of Independent States, risks associated with custody and counterparties are higher than in developed countries.

Russian custodial institutions observe their own rules, have significantly less responsibility and accountability to investors, are poorly regulated and are susceptible to fraud, negligence or error.

The securities markets in these countries may suffer from impaired liquidity, pervasive criminal activity and market manipulation, all of which may worsen price volatility and market disruptions.

It is understood that under the current Luxembourg regulation a fund may invest not more than 10% of its net assets in unlisted securities not dealt on a Regulated Market. Some investments in Russian securities may be considered as falling under such limit.

**SECURITISATION RISK** Mortgage-backed and asset-backed securities (MBS and ABS), and other types of collateralised debt security, typically carry prepayment and extension risk and can carry above-average liquidity risk.

MBS (a category that includes collateralised mortgage obligations, or CMOs) and ABS (a category that includes collateral debt obligations, or CDOs) represent an interest in a pool of debt, such as credit card receivables, auto loans, student loans, equipment leases, home mortgages and home equity loans.

MBS and ABS also tend to be of lower credit quality than many other types of debt securities. To the extent that the debts underlying an MBS or ABS go into default or become noncollectable, the securities based on those debts will lose some or all of their value.

Any unexpected behavior in interest rates could hurt the performance of ABS/MBS and other callable debt securities (securities whose issuers have the right to pay off the security's principal before the maturity date).

When interest rates fall, issuers tend to pay off these securities and re-issue new ones at lower interest rates. When this happens, the fund may have no alternative but to reinvest the money from these prepaid securities at a lower rate of interest (prepayment risk).

In contrast, when interest rates rise, borrowers tend not to prepay their low-interest mortgages. This can lock in the fund to receiving below-market yields until interest rates fall or the securities mature (extension risk). It can also mean that the fund must either sell the securities at a loss or forgo the opportunity to make other investments that might have performed better.

The prices and yields of callable securities typically reflect the assumption that they will be paid off at a certain point before maturity. If this prepayment happens when expected, the fund generally will not suffer any adverse effects. However, if it happens substantially earlier or later than expected, it can mean that the fund effectively overpaid for the securities.

These factors can also affect the fund's duration, increasing or decreasing sensitivity to interest rates. In some circumstances, the failure of rates to rise or fall when anticipated could cause prepayment or extension risks as well.

**SHORT POSITION RISK** Taking a short position (a position whose value moves in the opposite direction from the value of the security itself) through derivatives creates losses when the underlying security's value rises. The use of short positions may increase the risk of both loss and volatility.

Potential losses from using short position are theoretically unlimited as there is no restriction on the price to which a security may rise, whereas the loss from a cash investment in the security cannot exceed the amount invested.

The short selling of investments may be subject to changes in regulations, which could create losses or the inability to continue using short positions as intended or at all.

**SMALL AND MID CAP EQUITY RISK** Equities of small and mid capitalisation companies can be more volatile and less liquid than those of larger companies.

Small and mid capitalisation companies often have fewer financial resources, shorter operating histories and less diverse business lines, and as a result can be at greater risk of long-term or permanent business setbacks. Initial public offerings (IPOs) can be highly volatile and can be hard to evaluate because of a lack of trading history and relative lack of public information.

**SOVEREIGN DEBT RISK** Debt issued by governments and government-owned or -controlled entities can be subject to many risks, especially in cases where the government is reliant on payments or extensions of credit from external sources, is unable to institute necessary systemic reforms or to control domestic sentiment, or is vulnerable to changes in geopolitical or economic sentiment.

Even if a government issuer is financially able to pay off its debt, investors may have little recourse should it decide to delay,

discount or cancel its obligations, as the main avenue to pursue payment is typically the sovereign issuer's own courts.

Investment in sovereign debt exposes a fund to direct or indirect consequences of, inter alia, political, social and economic changes.

**SPECIAL PURPOSE ACQUISITION COMPANIES RISK** Where provided in their investment policies some of the funds may invest in stock, warrants and other securities of special purpose acquisition companies ("SPACs") or similar entities that pool funds to seek potential acquisition opportunities. A SPAC generally invests its assets in government securities, money market fund securities and cash, which is returned to shareholders in the event that the assets are not used to complete an acquisition within a specified period of time. SPACs and similar entities are listed shell companies without an operating history or ongoing business other than seeking acquisitions, therefore the value of their securities is dependent on the ability of the entity's management to identify and complete an acquisition.

**SUSTAINABLE INVESTING RISK** To the extent the fund weighs ESG or sustainability criteria in choosing investments, it may underperform the market or other funds that invest in similar assets but do not apply sustainability criteria.

While the fund, in selecting investments, may use a proprietary ESG scoring process that is based partially on third party data, such data may be incomplete or inaccurate.

In making its proxy voting decisions consistent with ESG criteria, exclusionary criteria, the fund may not always be consistent with maximising an issuer's short-term performance. For information about Fidelity's ESG voting policy, go to [www.fidelity.lu/sustainable-investing/our-policies-and-reports](http://www.fidelity.lu/sustainable-investing/our-policies-and-reports).

**TARGET DATE FUND RISK** As the fund's asset allocation becomes more conservative, its potential for growth diminishes, and thus also its ability to recoup any existing or future losses. You might not get all of your original investment back on the target date.

Certain funds may periodically change their allocation across asset classes and therefore may incur greater transaction costs than a fund with a static allocation strategy.

**TAX RISK** Some countries tax interest, dividends or capital gains on certain investments in their country. Any country could change its tax laws or treaties in ways that affect the fund or its shareholders.

Tax changes potentially could be retroactive and could affect investors with no direct investment in the country. For example, if China were to change its tax classification of the SICAV or a related entity, modify or cease honoring a tax treaty or eliminate tax incentives, it could increase the taxes due on Chinese investments or even result in a tax of 10% (or greater) on the income the SICAV receives from all sources worldwide, including in those funds that do not hold any Chinese investments.

The SICAV cannot guarantee that it will be exempt from FATCA or other withholding requirements or that it will provide all necessary information for shareholders to comply with their tax reporting requirements. Any fines associated with the discovery of a US investor as a shareholder in any fund would be paid out of shareholder assets, costs the SICAV is unlikely to be able to recover.

**TECHNOLOGY AND INNOVATION RISK** Technology and innovation companies tend to have above-average volatility. The success or failure of a product or company can change rapidly with new developments in technology, consumer preference and regulation as well as the outcome of lawsuits, mergers and changes in personnel or strategy.

Technology and innovation companies are vulnerable to supply chain disruptions, high employee turnover and workplace welfare issues. The technology sector has above-average cyber security risk because of its disproportionately large online presence.

# General Investment Powers and Restrictions

Each fund, and the SICAV itself, must comply with all applicable EU and Luxembourg laws and regulations, as well as certain circulars, guidelines and other requirements. This section presents, in tabular form, the fund management requirements of the 2010 law (the main law governing the operation of a UCITS) as well as the requirements set by the European Securities and Markets Authority (ESMA) for money market funds and for risk monitoring and management. In case of any discrepancy, law itself, in the original French, would prevail over either the articles of incorporation or the prospectus (with the articles of incorporation taking precedence over the prospectus).

If any violation of the 2010 law or the money market fund regulation by a fund is detected, the Investment Manager must make compliance with the relevant policies a priority in its securities trades and investment management decisions, while also taking due account of the interests of shareholders. Any violation that arises incidentally must be resolved as soon as possible, consistent with the normal course of fund operations.

Except where otherwise noted, all percentages and restrictions apply to each fund individually, and all asset percentages are measured as a percentage of its assets (including cash).

None of the funds qualifies as MMF as at the date of this Prospectus.

## Permitted assets, techniques and transactions

The table on the following page describes what is allowable to any UCITS. The funds may set limits that are more restrictive in one way or another, based on their investment objectives and policies. A fund's usage of any asset, technique or transaction must be consistent with its investment policies and restrictions.

No fund can acquire assets that come with unlimited liability attached, underwrite securities of other issuers (other than if it may be considered to do so in the course of disposing of fund securities), or issue warrants or other rights to subscribe for their shares.

Unless specified in their respective information funds are actively managed and do not seek to replicate or track the performance of any index. However, as part of the funds' active allocation policy, the Investment Manager may invest a portion of their assets from time to time in holdings and instruments which provide passive exposure, such as ETFs, futures, total return swaps, and swaps/options on an index.

Where appropriate to implement their investment objective, the investments for all Bond funds may be made in bonds issued in currencies other than the fund's Base Currency. The Investment Manager may choose to hedge currency exposures through the use of instruments such as forward foreign exchange contracts. Unless otherwise specified in its Investment objective or policy, securitised and/or collateralised securities (e.g. asset-backed securities and mortgage-backed securities) will not exceed 20% of the assets of a fund, provided that such limit will not apply to investments in such securities issued or guaranteed by the United States government or United States government sponsored entities. Equity funds are not expected to have any material exposure to securitised and/or collateralised securities.

Unless otherwise specified in its investment objective or policy, below investment grade or high yielding securities will not exceed 20% of the assets of a fund. Each fund may invest up to 10% of its net assets in UCITS and UCIs, unless otherwise specified in its investment objective.

Funds are not expected to have any material exposure (5% or more) to distressed securities, unless otherwise specified in their investment objectives or policies. Funds authorized to invest in fixed income securities may invest in bonds that can have conversion or subscription rights to other assets attached to them and can invest up to 100% of their assets in investment grade bonds, unless otherwise specified in their investment objectives. The Investment Manager is unconstrained in the amount it may invest in any country or region, unless otherwise specified in the fund's investment objective or policy.

### TERMS USED IN THIS SECTION

- The terms below are used mainly or exclusively in this "General Investment Powers and Restrictions" section and have the following meanings.
- ABCP** Asset-backed commercial paper.
- amortised cost** A valuation method in which acquisition cost is adjusted for amortisation of premiums or discounts up through maturity.
- CNAV** A public debt constant net asset value money market fund.
- eligible state** Any state that the Board considers to be consistent with a given portfolio's investment objective.
- EU-level issuers** The EU, a central authority or central bank of a European member state, the European Central Bank, the European Investment Bank, the European Stability Mechanism or the European Financial Stability Facility.
- EU and international issuers** All EU-level issuers, plus any regional or local authority of a European state, any sovereign nation or member state of a federation, and any relevant international body to which a European state belongs, such as the International Monetary Fund, International Bank for Reconstruction and Development, Council of Europe Development Bank, European Bank for Reconstruction and Development, or Bank for International Settlements.
- mark-to-market** A valuation method based on independent, readily available liquidation prices, such as prices from exchanges, screen prices, or quotes from multiple reputable independent brokers.
- mark-to-model** A valuation method that is benchmarked, extrapolated or otherwise calculated from one or more market inputs.
- member state** A member state of the EU or of the European Economic Area.
- MMF** A money market fund.
- money market instruments** Transferable instruments normally dealt in on the money market, such as treasury and local authority bills, certificates of deposits, commercial paper, bankers' acceptances, and medium- or short-term notes.
- LVNAV** A low volatility net asset value money market fund.
- regulated market** A regulated market within the meaning of Directive 2004/39/EC of the European Parliament, or any other market in an eligible state, country, or territory that the directors of the Management Company consider to be regulated, regularly operating, recognised, and open to the public.
- short-term MMF** An MMF that invests in eligible money market instruments referred to in article 10.1 of Regulation (EU) 2017/1131 of the European Parliament and of the Council of 14 June 2017 on money market funds (the "MMF Regulation") and is subject to the portfolio rules set out in article 24 of the MMF Regulation.
- standard MMF** An MMF that invests in eligible money market instruments referred to in article 10.1 and 10.2 and is subject to the portfolio rules set out in article 25 of the MMF Regulation.
- VNAV** A variable net asset value money market fund.
- weighted average life (WAL)** The average asset-weighted time to legal maturity of an MMF's total asset exposures; a measure of credit and liquidity risk.
- weighted average maturity (WAM)** The average asset-weighted time to legal maturity or the next interest rate reset, whichever is shorter, of an MMF's total asset exposures; a measure of sensitivity to interest rate risk.

Non-money market funds	Money market funds	Usage by funds
<b>1. Transferable securities and money market instruments</b>		
<p>Must be listed or traded on an official stock exchange in an eligible state, or on a regulated market in an eligible state (a market that operates regularly, is recognised and is open to the public).</p> <p>Recently issued securities must include in their terms of issue a commitment to apply for official listing on a regulated market and such admission must be received within 12 months of issue.</p>	<p>Must be listed or traded on a money market in an eligible state. For eligible states outside the EU, the money market must be approved by the competent authorities, provided for in law, or identified in the fund's rules or instruments of incorporation.</p>	<p>Widely used. Material usage is described in "Fund Descriptions".</p>
<b>2. Money market instruments that do not meet the requirements in row 1</b>		
<p>Must be subject (at the securities or issuer level) to regulation aimed at protecting investors and savings and must meet one of the following:</p> <ul style="list-style-type: none"> <li>be issued or guaranteed by a central, regional or local authority, or a central bank of an EU member state, the European Central Bank, the European Investment Bank, the EU, a public international body to which at least one EU member state belongs, a sovereign nation, or a member state of a federation</li> <li>be issued by an undertaking of any securities that qualify under row 1 (with exception of recently issued securities)</li> <li>be issued or guaranteed by an institution that is subject to, and complies with, EU prudential supervision rules or other rules the CSSF considers to be at least as stringent</li> </ul> <p>Can also qualify if the issuer belongs to a category approved by the CSSF, is subject to investor protections that are equivalent to those described above, and meets one of the following criteria:</p> <ul style="list-style-type: none"> <li>is issued by a company with at least EUR 10 million in capital and reserves that publishes annual accounts consistent with Directive 2013/34/EU</li> <li>is issued by an entity dedicated to financing a group of companies at least one of which is publicly listed</li> <li>is issued by an entity dedicated to financing securitisation vehicles that benefit from a banking liquidity line</li> </ul>	<p>Must have a remaining or effective maturity or reset date of 397 days or less (with floating- or fixed-rate instruments hedged by swaps that reset to a money market rate or index) and must also meet all of the following that apply:</p> <p>be issued or guaranteed by one or more EU-level issuers</p> <p>be issued or guaranteed by one or more EU and international issuers, with both issue and issuer receiving favourable internal credit assessments</p> <p>if it is a securitisation or ABCP, it must be sufficiently liquid, have a favourable internal credit assessment, have a legal maturity of 2 years or less, and meet one of the following:</p> <p>it is a securitisation referred to in article 13 of Commission Delegated Regulation (EU) 2015/61, <b>Short-Term MMF</b> also must be an amortising instrument with a WAL of 2 years or less</p> <p>it is not (and does not include, even on a look-through basis) a re-securitisation or synthetic securitisation, and it is fully supported by the issuing regulated credit institution as to liquidity and credit risks, material dilution risks, ongoing transaction and programme costs, and any necessary investor guarantees of full payment; <b>Short-Term MMF</b> legal maturity at issuance must be 397 days or less</p> <p>it is a simple, transparent, standardised (STS) securitisation or ABCP; <b>Short-Term MMF</b> must be amortising instruments, have a WAL of 2 years or less, and have had a legal maturity at issuance of 397 days or less</p>	<p>Widely used. Material usage is described in "Fund Descriptions".</p>
<b>3. Transferable securities and money market instruments that do not meet the requirements in rows 1 and 2</b>		
<p>Limited to 10% of fund assets.</p>	<p>Permitted as to money market instruments. No such ratio is applicable to money market funds.</p>	<p>Any usage likely to create material risk is described in "Fund Descriptions".</p>
<b>4. Shares of UCITS or other UCIs that are not linked to the SICAV*</b>		
<p>Must be limited by constitutional documents to investing up to 10% of assets in other UCITS or other UCIs.</p> <p>If the target investment is an "other UCI", it must do all of the following:</p> <ul style="list-style-type: none"> <li>invest in UCITS-allowable investments</li> <li>be authorised by an EU member state or by a state the CSSF considers to have equivalent laws on supervision, with adequate cooperation between authorities sufficiently ensured</li> <li>issue annual and semi-annual reports that enable an assessment of assets, liabilities, income and operations over the reporting period</li> <li>offer investor protections that are equivalent to those of a UCITS, in particular as to the rules on asset segregation, borrowing, lending and uncovered sales</li> </ul>	<p>The target MMF must be limited to investing up to 10% of assets in other MMFs, and those MMFs must be authorised under these same rules as those listed in the left column.</p> <p>An acquiring MMF must invest up to 17.5% of assets in other MMFs and up to 5% of assets in any one MMF. By derogation to this rule the acquiring MMF can invest up to 20% of assets in other MMFs with a maximum of 30% in aggregate of assets in targeted MMF which are not UCITS in accordance with Article 55 of the UCITS directive provided that the eligible MMFs are marketed solely through an employee savings scheme, have only natural persons as investors, are governed by national law, and under that law can permit redemptions only in non-market-related circumstances.</p> <p>An MMF that invests 10% or more of assets in other MMFs must disclose in its prospectus the maximum allowable management fees payable by both the target and acquiring MMFs, and in its annual report the amounts actually paid.</p> <p>The target fund cannot invest, in turn, in the acquiring fund (reciprocal ownership). The underlying investments held by the targeted MMF in which a fund invests do not need to be considered for the purposes of the diversification limits set forth in the Diversification requirements for Money Market Funds table. The acquiring MMF surrenders all voting rights in shares of the target MMF it acquires.</p> <p>A short-term MMF can only invest in other short-term MMFs.</p>	<p>Any usage that is over 10% of fund assets is disclosed in "Fund Descriptions". Total annual management fees of funds and underlying UCITS/ other UCIs may be up to 3%.</p>

\* May include ETFs. A UCITS or other UCI is considered to be linked to the SICAV if both are managed or controlled by the same Management Company or another affiliated management company.



Non-money market funds	Money market funds	Usage by funds
<b>5. Shares of UCITS or other UCIs that are linked to the SICAV*</b>		
<p>Must meet all non-money market fund requirements in row 4. The SICAV's annual report must state the total annual management and advisory fees charged both to the fund and to the UCITS/other UCIs in which the fund has invested during the relevant period.</p> <p>The UCITS/other UCI cannot charge a fund any fees for subscribing for or redeeming shares.</p>	<p>Same as row 4. If the acquiring MMF and Target MMF are managed or controlled by the same Management Company or another affiliated management company, the Management Company or that other company is prohibited from charging subscription or redemption fees</p>	<p>Non-MMF usage same as row 4, plus funds pay no annual management or advisory fees to any linked UCITS/other UCI.</p>
<b>6. Shares of other funds of the SICAV</b>		
<p>Must meet all non-money market fund requirements in rows 4 and 5.</p> <p>The target fund cannot invest, in turn, in the acquiring fund (reciprocal ownership).</p> <p>The acquiring fund surrenders all voting rights in shares of the target fund it acquires.</p> <p>When measuring whether a fund meets the minimum required asset level, the value of investment in target funds is not included.</p>	<p>Same as row 4.</p>	<p>Non-MMF usage same as row 4, plus funds pay no annual management or advisory fees to any other funds.</p>
<b>7. Real estate and commodities, including precious metals</b>		
<p>Direct ownership of commodities, or certificates representing them, is prohibited. Investment exposure is allowed only indirectly, through assets, techniques and transactions allowed under the 2010 Law.</p> <p>The financial indices used to obtain exposure to commodities through financial derivatives instruments comply with the requirements set out in the article 9 of the Grand-Ducal Regulation of 8 February 2008.</p> <p>Direct ownership of real estate and other tangible property is prohibited except for any used by the SICAV itself for its operations.</p>	<p>Exposure not permitted in any form.</p>	<p>Usage likely to create material risk is described in "Fund Descriptions". Direct purchases of real or tangible property are unlikely.</p>
<b>8. Deposits with credit institutions</b>		
<p>Must be repayable or withdrawable on demand, and any maturity date must be up to 12 months in the future.</p> <p>The credit institutions either must have a registered office in an EU member state or, if not, be subject to prudential supervision rules the CSSF considers to be at least as stringent as EU rules.</p>	<p>Same as for non-money market funds.</p>	<p>Any usage will be described in "Fund Descriptions".</p>
<b>9. Ancillary liquid assets</b>		
<p>Limited to 20% of the portfolio net assets under normal market circumstances.</p> <p>Only bank deposits at sight, such as cash held in current accounts with a bank accessible at any time.</p> <p>Must be held only for treasury purposes or a period of time necessary in case of unfavourable market conditions.</p> <p>On a temporary basis, if justified by exceptionally unfavourable market conditions and where in the best interests of the shareholders, ancillary liquid assets may represent more than 20% of the portfolio net assets.</p>	<p>Limited to 20% of the portfolio net assets.</p> <p>Only bank deposits at sight, such as cash held in current accounts with a bank accessible at any time.</p>	<p>Commonly used by all funds, and may be used extensively for temporary defensive purposes.</p>
<b>10. Derivatives and equivalent cash-settled instruments</b> See also "How the Funds Use Instruments and Techniques" on page 34.		
<p>Underlying assets must be those described in rows 1, 2, 4, 5, 6 and 8 or must be financial indices (compliant with article 9 of the Grand-Ducal Regulation of 8 February 2008), interest rates, foreign exchange rates or currencies consistent with fund investment objectives and policies.</p> <p>All usage must be adequately captured by the risk management process described in "Management and monitoring of global risk" below.</p> <p>OTC derivatives must meet all of the following criteria:</p> <ul style="list-style-type: none"> <li>• be subject to reliable and verifiable independent daily valuations</li> <li>• be able to be sold, liquidated or closed by an offsetting transaction at their fair value at any time at the SICAV's initiative</li> <li>• be with counterparties that are institutions subject to prudential supervision and that belong to categories approved by the CSSF</li> </ul>	<p>Must be dealt in on a regulated market as referred to in row 1 or OTC and all of the following conditions are fulfilled:</p> <ul style="list-style-type: none"> <li>• the underlying of the derivative instrument consists of interest rates, foreign exchange rates, currencies or indices representing one of those categories;</li> <li>• the derivative instrument serves only the purpose of hedging the interest rate or exchange rate risks inherent in other investments of the SICAV;</li> <li>• the counterparties to OTC derivative transactions are institutions subject to prudential regulation and supervision and belonging to the categories approved by the competent authority of the SICAV;</li> <li>• the OTC derivatives are subject to reliable and verifiable valuation on a daily basis and can be sold, liquidated or closed by an offsetting transaction at any time at their fair value at the SICAV's initiative</li> </ul>	<p>Material usage is described in "Fund Descriptions".</p>

\* May include ETFs. A UCITS or other UCI is considered to be linked to the SICAV if both are managed or controlled by the same Management Company or another affiliated management company.

Non-money market funds	Money market funds	Usage by funds
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<b>11. Securities lending, repurchase/reverse repurchase agreements</b> See also “How the Funds Use Instruments and Techniques” on page 34.		
<p>Must be used for efficient portfolio management only.</p> <p>The volume of transactions must not interfere with a fund’s pursuit of its investment policy or its ability to meet redemptions. With loans of securities and with repurchase transactions, the fund must ensure that it has sufficient assets to settle the transaction.</p> <p>All counterparties must be subject to EU prudential supervision rules or to rules the CSSF considers to be at least as stringent.</p> <p>For each transaction, the fund must receive and hold collateral that is at least equivalent, at all times during the lifetime of the transactions, to the full current value of the securities lent.</p> <p>During the life of a repurchase contract, the fund cannot sell the securities that are the object of the contract, either before the right to repurchase these securities has been exercised by the counterparty, or the repurchase term has expired.</p> <p>A fund may lend securities:</p> <ul style="list-style-type: none"> <li>• directly to a counterparty</li> <li>• through a lending system organised by a financial institution that specialises in this type of transaction</li> <li>• through a standardised lending system organised by a recognised clearing institution</li> </ul> <p>The SICAV cannot grant or guarantee any other type of loan to a third party.</p> <p>The fund must have the right to terminate any securities lending, repurchase or reverse repurchase transaction and to recall the securities that have been lent or are subject to the repurchase agreement.</p>	<p><b>Securities lending</b> is not permitted.</p> <p>The MMF must have the right to terminate a repurchase or reverse repurchase agreement with up to two working days’ notice; for reverse repurchase agreements, the MMF must receive back the full amount of cash (on either an accrued or mark-to-market basis; if the latter, that value must be used in calculating NAV).</p> <p>Repurchase agreements must meet all of the following criteria:</p> <ul style="list-style-type: none"> <li>• be no longer than 7 working days</li> <li>• be used only to manage temporary liquidity</li> <li>• the counterparty cannot sell, invest, pledge or otherwise transfer assets provided as collateral without the fund’s prior consent</li> <li>• the cash received must not exceed 10% of MMF assets and must be placed in deposits or invested in assets that are issued or guaranteed by one or more EU-level issuers or a central authority or central bank of a third country and that have received, for both issuer and issue, favourable internal credit assessments</li> </ul> <p>Assets received through reverse repurchase agreements must meet all of the following:</p> <ul style="list-style-type: none"> <li>• market value must at all times at least equal cash paid out</li> <li>• they are money market instruments as described in row 2 above</li> <li>• they are issued by an entity that is independent from the counterparty and not expected display high correlation with it</li> <li>• the MMF cannot sell, invest, pledge or otherwise transfer assets provided as collateral without the counterparty’s prior consent</li> <li>• they do not create more than 15% exposure to any one issuer except an EU and international issuer</li> </ul> <p>Assets received through reverse repurchase agreements in accordance with the exceptions column of row A in the “Diversification requirements” table below.</p>	<p>Material usage is described in “Fund Descriptions”. For securities lending, the funds require higher collateral than regulations specify.</p>
<b>12. Borrowing</b>		
<p>The SICAV is not allowed to borrow in principle except if it on a temporary basis and represents up to 10% of fund assets. The SICAV may however acquire foreign currency via back-to-back loans.</p>	<p>Not permitted in any form.</p>	<p>No funds currently intend to borrow from banks.</p>
<b>13. Short exposure</b>		
<p>Direct short sales are prohibited. Short positions may be acquired only indirectly, through derivatives.</p>	<p>Exposure not permitted in any form.</p>	<p>Any usage likely to create material risk is described in “Fund Descriptions”.</p>

Master - Feeder funds

The SICAV can create funds, that qualify as a master fund or a feeder fund. It can also convert existing funds into feeder funds, or switch any feeder fund to a different master fund. The rules below apply to any sub-fund that is a feeder fund.

Security	Investment requirements	Other terms and requirements
Units of the master fund	<ul style="list-style-type: none"> <li>• At least 85% of assets</li> </ul>	
Derivatives and ancillary liquid assets	<ul style="list-style-type: none"> <li>• Up to 15% of assets</li> </ul>	<p>Derivatives must only be used for hedging. Movable and immovable property must be essential for the direct pursuit of the feeder fund’s business. In measuring derivatives exposure, the fund must combine its own direct exposure with the exposure created by the master fund.</p>

**Additional voluntary requirements**

Certain funds have voluntarily agreed to manage their portfolios to comply with certain requirements where doing so will allow them to distribute the funds in the countries indicated below, and in some cases to offer tax benefits to investors in those countries. This table lists only requirements that concern portfolio investment and that exceed those otherwise applicable to a fund (including the fund’s own limits as stated in this prospectus).

Jurisdiction	Requirements	Applies to
Germany	<ul style="list-style-type: none"><li>Must invest at least 50% of its assets (25% for mixed asset funds) in equities.</li></ul>	Funds stating an intention to be eligible under the German Investment Tax Act (GITA) in “Fund Descriptions”.

Diversification requirements

To ensure diversification, a fund cannot invest more than a certain amount of its assets in one issuer, as defined below. These diversification rules do not apply during the first 6 months of a fund’s operation, but the fund must observe the principle of risk spreading.

For purposes of this table, companies that share consolidated accounts (whether in accordance with Directive 83/349/EEC or with recognised international rules) are considered to be a single issuer. The percentage limits indicated by the vertical brackets in the center of the table indicate the maximum aggregate investment in any single issuer for all bracketed rows.

Maximum investment/exposure, as a % of fund assets				
Category of securities	In any one issuer	In aggregate	Other	Exceptions
NON-MONEY MARKET FUNDS				
A. Transferable securities and money market instruments issued or guaranteed by a sovereign nation, any EU public local authority, or any public international body to which one or more EU member states belongs.	35%	35%		A fund may invest up to 100% of its assets in a single issuer, if it is investing in accordance with the principle of risk spreading and meets all of the following criteria: <ul style="list-style-type: none"><li>• it invests in at least 6 different issues</li><li>• it invests up to 30% in any one issue</li><li>• the securities are issued by an EU member state, its local authorities or agencies, a member state of the OECD or of the G20, Singapore or by a public international bodies of which one or more EU member state belongs</li></ul> The exception described for row C applies to this row as well.
B. Bonds issued by a credit institution whose registered office is in an EU member state and which is subject by law to special public supervision designed to protect bondholders*.	25%			80% in any issuers in whose bonds a fund has invested more than 5% of assets.
C. Any transferable securities and money market instruments other than those described in rows A and B above.	10%	20%	20% in transferable securities and money market instruments within the same group. 40% in all issuers in which a fund has invested more than 5% of assets (does not include deposits and counterparty exposure for OTC derivative contracts).	For index-tracking funds, the 10% increases to 20% in the case of a published, sufficiently diversified index that is adequate as a benchmark for its market and is recognised by the CSSF. This 20% increases to 35% (but for one issuer only) when a security is highly dominant in the Regulated Market in which it trades.
D. Deposits with credit institutions.	20%			
E. OTC derivatives with a counterparty that is a credit institution as defined in row 8 above (first table in section).	10% max risk exposure (OTC derivatives and efficient portfolio management techniques combined)			Derivatives on eligible indices do not count for purposes of complying with rows A - D and row G (i.e. there is no look through to the securities comprising the index).
F. OTC derivatives with any other counterparty.	5% max risk exposure			
G. Shares of UCITS or UCIs as defined in rows 4 and 5 above (first table in section).	With no specific statement in the fund's objective and policies, 10% in one or more UCITS or other UCIs With a specific statement: <ul style="list-style-type: none"><li>• 20% in any one UCITS or UCI</li><li>• 30% in aggregate in all UCIs other than UCITS</li><li>• 100% in aggregate in all UCITS</li></ul>		Target funds of an umbrella structure whose assets and liabilities are segregated are considered as a separate UCITS or other UCI.  Assets held by the UCITS or other UCIs do not count for purposes of complying with rows A - F of this table.	

\* These bonds also must invest all sums deriving from their issuance in assets that, for the life of the bonds, are capable of covering all claims attaching to the bonds and in case of issuer bankruptcy would be used, on a priority basis, to reimburse principal and accrued interest.



Maximum investment/exposure, as a % of fund assets

Category of securities	In any one issuer	In aggregate	Other	Exceptions
<b>MONEY MARKET FUNDS</b>				
<b>H. Money market instruments</b>	5%			With regulator approval, and with disclosure in constitutional and marketing documents that includes a list of issuers in which 5% or more of assets may be invested, a fund may invest in as few as six issues that are issued by an EU member state, its local authorities or agencies, a member state of the OECD or of the G20, Singapore or by a public international bodies of which one or more EU member state belongs, up to 100% net exposure, if it is investing in accordance with the principle of risk spreading and invests up to 30% in any one issue.
<b>I. Money market instruments, securitisations and ABCPs issued by the same body</b>	5%	5%		Derogation: a VNAV MMF fund may invest up to 10 % provided that the total value of such money market instruments, securitisations and ABCPs held in each issuing bodies in each of which it invests more than 5 % of its assets does not exceed 40 % of the value of its assets. Aggregate exposure to securitisations and ABCP up to 20% (15% for non STS ones).
<b>J. Bonds issued by a credit institution whose registered office is in an European state and which is subject by law to special public supervision designed to protect bondholders.</b>	10%	15%	40% in aggregate in all issuers in whose bonds a fund has invested more than 5% of assets.	Sums deriving from the issue of these bonds must be invested in assets which, during the whole period of validity of such bonds, are capable of covering claims attaching to the bonds and which, in the event of failure of the issuer, would be used on a priority basis for the reimbursement of the principal and payment of the accrued interest.
<b>K. Bonds issues by a single credit institutional where the requirements set out in point (f) of Article 10(1) or point (c) of Article 11 (1) of the Delegated Regulation (EU) 2015/61 are met.</b>	20%			When a fund invests more than 5% of its assets in such bonds issued by a single issuer, the total value of those investments shall not exceed 60% of the value of the assets of the fund.
<b>L. Deposits with credit institutions.</b>	10%			Increases to 15% (and the aggregate limit of 15% on row H through L exposures increases to 20%) if there are not enough viable credit institutions in the MMF's jurisdiction to allow it to meet the diversification requirement and it is not economically feasible to make deposits in another member state. With local regulator approval, increases to 100% for instruments issued or guaranteed by EU and international issuers.
<b>M. OTC derivatives.</b>	5% exposure to any one counterparty			
<b>N. Reverse repurchase agreements.</b>	15% in cash to any one counterparty			Received assets: exposure to a given issuer up to 15%, except where those assets take the form of money market instruments that fulfil the requirements of the 100% derogation under row 1.

Limits on concentration of ownership

These limits are intended to prevent the SICAV or a fund from the risks that could arise (for itself or an issuer) if it were to own a significant percentage of a given security or issuer. For purposes of this table and the diversification table below, companies that share consolidated accounts (whether in accordance with Directive 83/349/EEC or with recognised international rules) are considered to be a single issuer. A fund does not need to comply with the investment limits described below when exercising subscription rights attaching to portfolio assets, so long as any resulting violations of the investment restrictions are corrected as described in the introduction to “General Investment Powers and Restrictions”.

Category of securities		Maximum ownership, as a % of the total value of the securities issued	
NON-MONEY MARKET FUNDS			
Securities carrying voting rights	Less than would enable the SICAV to exercise significant influence over the management of an issuer		<p>These rules do not apply to:</p> <ul style="list-style-type: none"><li>• securities described in row 1 of the table above</li><li>• shares of a non-EU company that invests mainly in its home country and represents the only way for a portfolio to invest in that country under the 2010 Law</li><li>• purchases or repurchases of shares of subsidiaries that provide only management, advice or marketing in their country, when done as a way of effecting transactions for SICAV shareholders in accordance with the 2010 law</li></ul>
Non-voting securities of any one issuer	10%	<p>These limits can be disregarded at purchase if at that time the gross amount of bonds or money market instruments, or the net amount of the instruments in issue, cannot be calculated.</p>	
Debt securities of any one issuer	10%		
Money market securities of any one issuer	10%		
Shares of any sub-fund of an umbrella UCITS or UCI	25%		
MONEY MARKET FUNDS			
Money instruments, securitisations and ABCPs of any one issuer	10%	Does not apply to money market instruments issued or guaranteed by EU and international issuers.	

Management and monitoring of global risk

The Management Company has implemented a risk management process, approved and supervised by its board, to monitor and measure at any time the overall risk profile of each fund from direct investment, derivatives, techniques, collateral and all other sources. Further information about the risk management process is available upon request from the Management Company.

Global exposure assessments are calculated every trading day (whether or not the fund calculates a NAV for that day), and encompass numerous factors, including coverage for contingent liabilities created by derivative positions, counterparty risk, foreseeable market movements and the time available to liquidate positions.

Any derivatives embedded in transferable securities or money market instruments count as derivatives held by the fund, and any exposure to transferable securities or money market instruments gained through derivatives (except certain index-based derivatives) counts as investment in those securities or instruments.

**RISK MONITORING APPROACHES** There are 3 main risk measurement approaches: the commitment approach and the 2 forms of value at risk (VaR), absolute VaR and relative VaR. These approaches are described below, and the approach each fund uses is identified in “Fund Descriptions”. The Management Company chooses the approach a fund will use based on its investment policy and strategy.

Approach	Description
Absolute Value-at-Risk (Absolute VaR)	The fund seeks to estimate the maximum potential loss due to market risk it could experience in a month (20 trading days) under normal market conditions. The estimate is based on the previous 12 months (250 business days) of the fund’s performance, and requires that 99% of the time, the fund’s worst outcome is no worse than a 20% decline in net asset value.
Relative Value-at-Risk (Relative VaR)	The relative VaR of the fund is expressed as a multiple of a benchmark or reference portfolio. The fund seeks to estimate the potential loss due to market risk it could experience within one month (20 trading days) under normal market conditions. The estimate is based on the previous 12 months (250 business days) of the fund’s performance, and requires that 99% of the time, the fund’s worst outcome cannot exceed 200% of the VaR of the relevant benchmark or reference portfolio.
Commitment	The fund calculates its global exposure by taking into account either the market value of an equivalent position in the underlying asset or the derivative’s notional value, as appropriate. This allows the fund to reduce its global exposure by taking into account the effects of any hedging or offsetting positions. Certain types of risk-free transactions, leverage-free transactions and non-leveraged swaps are therefore not included in the calculation. A fund using this approach must ensure that its overall market exposure does not exceed 210% of its assets (100% from direct investment, 100% from derivatives and 10% from borrowings).

**GROSS LEVERAGE** Any fund that uses a VaR approach must also calculate its expected level of gross leverage, which is stated in “Fund Descriptions”. A fund’s expected leverage is a general indication, not a regulatory limit; the actual leverage may exceed the expected level from time to time. However, a fund’s use of derivatives will remain consistent with its investment objective, investment policies and risk profile, and will comply with its VaR limit.

Gross leverage is a measure of the leverage created by total derivative usage and by any instruments or techniques used for efficient portfolio management. It is calculated as the “sum of the notionals” (the exposure of all derivatives, without treating opposing positions as canceling each other out). Since this calculation does not consider sensitivity to market movements or whether a derivative is increasing or decreasing a fund’s overall risk, it may not be representative of a fund’s actual level of investment risk.

## How the Funds Use Instruments and Techniques

### Purpose and regulatory framework

A fund may use the instruments and techniques described below for efficient fund management, which is defined as reducing risks or costs or generating additional capital or income, to gain exposure to certain investments or markets and for hedging against various types of risk. All usage must be consistent with the fund’s risk profile, objective and investment strategy as defined in this prospectus, and with the 2010 Law, the UCITS Directive, Grand Ducal regulation of 8 February 2008, CSSF Circulars 08/356 and 14/592, ESMA guidelines 14/937, the Securities Financing Transactions (SFT) regulation (EU) 2015/2365 and any other applicable law and regulation.

The risks associated with instruments and techniques are described in “Risk Descriptions”.

### Derivatives the Funds can use

A derivative is a financial contract whose value depends on the performance of one of more reference assets (such as a security or basket of securities, an index or an interest rate). Derivatives may be over-the-counter (“OTC”) and/or exchange traded instruments.

Always consistent with its investment policy, each fund may invest in any type of financial derivative instrument (for MMF funds, refer to “Rules related to funds”.) These may include the following types currently making up the most common derivatives:

- financial futures (contracts that deliver payments based on future values), such as futures on securities, interest rates, indices or currencies
- options (contracts that confer the right, or the obligation, to buy or sell an asset during a stated period of time), such as options on equities, interest rates, indices (including commodity indices), bonds, currencies or swaps (swaptions), and on futures
- warrants (contracts that confer the right to buy or sell an equity or other security at a certain price during a stated period of time)
- forwards (contracts to buy or sell an asset at a specified price on a future date), such as foreign exchange contracts
- swaps (contracts where two parties exchange the returns from two different reference assets, such as foreign exchange, index, inflation rate or interest rate swaps, and swaps on volatility or baskets of equities, but NOT including total return, credit default or variance swaps, which are listed separately)
- credit derivatives, such as credit default swaps, or CDSs (contracts where one party receives a fee from the counterparty in exchange for agreeing that, in the event of a bankruptcy, default or other “credit event”, it will make payments to the counterparty designed to cover the latter’s losses)
- structured derivatives, such as credit-linked and equity-linked securities

- contracts for difference (contracts whose value is based on the difference between two reference measurements such as a basket of securities)
- total return swaps or other derivatives with similar characteristics (TRS) (transaction in which one counterparty makes payments based on a fixed or variable rate to the other counterparty, who transfers the total economic performance, including income from interest and fees, gains and losses from price movements, and credit losses, of a reference obligation, such as an equity, bond or index); TRS can be funded or unfunded (with or without a required up-front payment. TRS transaction will be undertaken on single name equity and fixed income instruments or financial indices. The Funds intend to use TRS (including CFDs) in accordance with the provisions on the use of financial derivative instruments and within the maximum and expected levels disclosed in the Fund Descriptions.

Futures are generally exchange-traded. All other types of derivatives are generally OTC.

For any index-linked derivatives, the index provider determines the rebalancing frequency and the effects of the cost to the relevant fund will depend on the rebalancing frequency.

### What the funds can use derivatives for

A fund may use derivatives for any of the following purposes, consistent with its objective and policies as described in “Fund Descriptions”.

**Hedging** Hedging is taking a market position that is in the opposite direction from – and is no greater than – the position created by other fund investments, for the purpose of reducing or canceling out exposure to price fluctuations or certain factors that contribute to them.

- **Credit hedging** Typically done using credit default swaps. The goal is to hedge against credit risk. This includes purchasing or selling protection against the risks of specific assets or issuers as well as proxy hedging (taking an opposite position in a different investment that is likely to behave similarly to the position being hedged).
- **Currency hedging** Typically done using currency forwards. The goal is to hedge against currency risk. This can be done at the fund level and, with H shares, at the share class level. All currency hedging must involve currencies that are within the applicable fund’s benchmark or are consistent with its objectives and policies. When a fund holds assets denominated in multiple currencies, it might not hedge against currencies that represent small portions of assets or for which a hedge is uneconomical or unavailable. A fund may engage in:
  - direct hedging (same currency, opposite position)
  - cross-hedging (reducing exposure to one currency while increasing exposure to another, the net exposure to the base currency being left unchanged), when it provides an efficient way of gaining the desired exposures
  - proxy hedging (taking an opposite position in a different currency that is considered likely to behave similarly to the base currency)

anticipatory hedging (taking a hedge position in anticipation of an exposure that is anticipated to arise as the result of a planned investment or other event)

- **Duration hedging** Typically done using interest rate swaps, swaptions and futures. The goal is to seek to reduce the exposure to rate shifts for longer-maturity bonds. Duration hedging can be done only at the fund level.
- **Price hedging** Typically done using options on indices (specifically, by selling a call or buying a put). Usage is generally limited to situations where there is sufficient correlation between the composition or performance of the index and that of the fund. The goal is to hedge against fluctuations in the market value of a position.
- **Interest rate hedging** Typically done using interest rate futures, interest rate swaps, writing call options on interest rates or buying put options on interest rates. The goal is to manage interest rate risk.

**Investment exposure** A fund can use any allowable derivative to gain exposure to permissible assets, in particular when direct investment is economically inefficient or impracticable.

**Leverage** A fund can use any allowable derivative to increase its total investment exposure beyond what would be possible through direct investment. Leverage typically increases fund volatility.

**Index replication** derivatives may be used to replicate the performance of a security or asset class (e.g. commodity indexes or property). Other strategies may include positions that benefit from a decline in value or that give exposure to certain elements of returns of a particular issuer or asset in order to provide returns that are unrelated to those of the general market or positions that would not have been available without the use of derivatives.

**Cash funds** may use financial derivative instruments only for the purpose of hedging the interest rate or exchange rate risks inherent in other investments of the relevant Cash funds.

**All funds** may use derivatives to manage risks, generate income or capital growth associated with the asset classes in which they invest, provided (a) they are economically appropriate in that they are realised in a cost-effective way, (b) they are entered into for one or more of (i) reduction of risk, (ii) reduction of cost and (iii) generation of additional capital or income with a level of risk which is consistent with the risk profile of the relevant fund(s) and the risk diversification rules of the funds; and (c) their risks are adequately captured by the risk management process of the SICAV.

Derivatives referencing underlying fixed income assets or components thereof may be used by the funds to (i) increase or reduce exposure to interest rate risk (including inflation) through the use of interest rate or bond futures, options and interest rate, total return or inflation swaps, (ii) buy or sell part or all of the credit risk relating to single issuer, or multiple issuers referenced in a basket or index through the use of bond futures, options, credit default and total return swaps and (iii) hedge, reduce or increase exposure to currencies through the use of forwards, including non-deliverable forwards and currency swaps

## Instruments and techniques the funds can use

A fund can use the following instruments and techniques with respect to any and all securities it holds, but only for efficient portfolio management (as described above).

### Securities lending

The Funds intends to engage in securities lending transactions on stocks, other equity securities instruments, and bonds for the purpose of efficient portfolio management and in accordance with the expected and maximum levels disclosed in the fund information. None of the funds enter into margin lending transactions as at the date of this prospectus.

Securities lending transactions will be entered into depending on market opportunities, in particular, on the market demand for the securities held in each fund's portfolio and the expected revenues of the transaction compared to the market conditions on the investment side.

Securities lending transactions to be entered into exclusively aim to generate additional value consistent with the fund's investment objective and its risk profile. As such, there is no restriction on the frequency under which a fund may engage into such type of transactions. Under no circumstances shall the above-mentioned operations cause a fund to diverge from its investment objective as laid down in the Prospectus or result in additional risk higher than its profile as described in the Prospectus.

The Management Company shall maintain the volume of these transactions at a level such that is able, at all times, to meet redemption requests.

**Counterparties:** The counterparties to such securities lending must be subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by EU law and specialised in this type of transaction. The counterparties to such transactions will generally be financial institutions based in an OECD member state and having an investment grade credit rating. The selected counterparties comply with Article 3 of the SFTR Regulation.

**Revenues paid to the funds:** With regard to the securities lending transactions, 87.5% of the gross revenue arising from such transactions are returned to the funds, while a 12.5% fee is paid to the Lending Agent (which is not an affiliate of the Investment Manager). Any operational costs (whether direct or indirect) borne by the Lending Agent from such securities lending activities are covered out of its fee. Further details on the actual return are published in the SICAV's annual reports and accounts.

**Lending agent, collateral agent and collateral manager:** The SICAV has appointed Brown Brothers Harriman & Co., a New York limited partnership with an office in Boston, Massachusetts ("Lending Agent") to carry out the securities lending transactions and the management of the collateral. The Lending Agent is not an affiliate of the Investment Manager.

### Repurchase and reverse repurchase agreement transactions

Repurchase transactions are governed by an agreement whereby the owner of the asset agrees to sell a security to another party in exchange for cash collateral and agrees to repurchase it on a specified date for a specified (higher) price. A Reverse Repurchase transaction is the opposite transaction whereby the cash holder agrees to sell the cash to another party in exchange for security collateral and agrees to repurchase the cash on a specified date for a specified (higher) value.

The Funds intend to engage in repurchase and reverse repurchase transactions for the purpose of Efficient Portfolio Management and in accordance with the expected and maximum levels disclosed in fund modules.

The Funds may only enter into reverse repurchase agreement and/or repurchase agreement transactions provided that it is able at any time (a) to recall the full amount of cash in a reverse repurchase agreement or any securities subject to a repurchase agreement, or (b) to terminate the agreement in accordance with applicable regulations and subject to prevailing repurchase agreement market rates. In this context, fixed-term transactions that do not exceed seven days should be considered as arrangements on terms that allow the assets to be recalled at any time by the SICAV.

Repurchase agreement transactions and reverse repurchase agreement transactions will be entered into opportunistically and on a temporary basis, in circumstances where the Investment Manager considers that the market rates will allow the relevant fund to benefit from more efficient cash management or improved portfolio returns when entering into any of these transactions.

**Counterparties:** The counterparties to such transactions must be subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by EU law and specialised in this type of transaction. The counterparties to such transactions will generally be financial institutions based in an OECD member state and having an investment grade credit rating. The selected counterparties comply with Article 3 of the SFTR Regulation.

**Revenues paid to the funds:** 100% of the revenues (or losses) generated by their execution of repurchase transactions or reverse repurchase transactions are allocated to the funds. The Investment Manager do not charge any additional costs or fees or receive any additional revenues in connection with these transactions. Further details on the actual return are published in the SICAV's annual reports and accounts.

**Where usage and fees are disclosed**

The following are disclosed in "Fund Descriptions" for any fund that currently uses them:

- for total return swaps, contracts for difference and similar derivatives: the maximum and expected exposure expressed as a percentage of net asset value
- for repurchase and reverse repurchase agreement transactions: the maximum and expected limits expressed as a percentage of net asset value
- for securities lending: the maximum and expected limits expressed as a percentage of net asset value

The following are disclosed in financial reports:

- the usage of all instruments and techniques used for efficient fund management
- in connection with this usage, the revenues received, and the direct and indirect operational costs and fees incurred by each fund
- who received payment for the above costs and fees and any relationship a recipient might have with any affiliates of FIL Group or the depositary
- information on the nature, use, reuse and safekeeping of collateral
- the counterparties the SICAV has used during the period covered by the report, including the major counterparties for collateral

Fees paid to the lending agent are not included in ongoing charges because they are deducted before the revenues are paid to the Fund.

**Counterparties to derivatives and techniques**

The Management Company adopts a counterparty risk management framework which measures, monitors and manages counterparty credit risk. In addition to the requirements stated in rows 10 and 11 in "General Investment Powers and Restrictions" table, a counterparty will be assessed on the following criteria:

- regulatory status
- protection provided by local legislation
- operational processes
- creditworthiness analysis including review of available credit spreads or external credit ratings; for CDSs and variance swaps, the counterparty must be a first-rate financial institution
- degree of experience and specialisation in the particular type of derivative or technique concerned

Legal status and country of origin or domicile are not in themselves directly considered as selection criteria.

Unless otherwise stated in this prospectus or with the consent of Directors, no counterparty to a fund derivative can serve as an Investment Manager of a fund or otherwise have any control or approval over the composition or management of a fund's investments or transactions or over the assets underlying a derivative.

The lending agent will continuously assess the ability and willingness of each securities borrower to meet its obligations, and the SICAV retains the right to rule out any borrower or to terminate any loan at any time. The generally low levels of counterparty risk and market risk associated with **Securities lending** are further mitigated by counterparty default protection from the lending agent and the receipt of collateral.

**Collateral policies**

These policies apply to assets received from counterparties in connection with transactions in securities lending, reverse repurchase transactions and OTC derivatives.

**ACCEPTABLE COLLATERAL** All securities accepted as collateral must be high quality. Collateral must be in form of:

- a) liquid assets (i.e., cash and short term bank certificates, money market instruments as defined in Council Directive 2007/16/EC of 19 March 2007) and their equivalent (including letters of credit and a guarantee at first-demand given by a first class credit institution not affiliated to the counterparty);
- b) bonds issued or guaranteed by a Member State of the OECD or their local authorities or by supranational institutions and undertakings with EU, regional or world-wide scope;
- c) shares or units issued by Money Market Funds calculating a net asset value on a daily basis and assigned a rating of AAA or its equivalent;
- d) shares or units issued by UCITS investing mainly in bonds/shares satisfying the conditions under (c);
- e) bonds issued or guaranteed by first class issuers offering an adequate liquidity, or
- f) shares admitted to or deal in on a regulated market or on a stock exchange of a members state of the OECD, provided that these shares are included in a main index

Securities that are the subject of purchase with a repurchase option or that may be purchased in reverse purchase agreements are limited to the type of securities mentioned under items (a), (b), (c), (e) and (f).

Non-cash collateral must be traded on a regulated market or multilateral trading facility with transparent pricing and must be able to be sold quickly for close to its pre-sale valuation.

To ensure that collateral is suitably independent from the counterparty as far as both credit risk and investment correlation risk, collateral issued by the counterparty or its group is not accepted. The collateral is not expected to display a high correlation with the performance of the counterparty.

Counterparty credit exposure is monitored against credit limits. All collateral should be capable of being fully enforced by the fund at any time without reference to, or approval from, the counterparty.

Collateral received from a counterparty in any transaction may be used to offset the overall exposure to that counterparty.

To avoid having to handle small collateral amounts, the SICAV may set a minimum collateral amount (amount below which it will not require collateral) or a threshold (incremental amount above which it will not require additional collateral).



**DIVERSIFICATION** All collateral held by the SICAV must be diversified by country, market and issuer, with exposure to any issuer no greater than 20% of a fund’s net assets. If stated in the fund description, a fund could be fully collateralised by 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. In this case, the fund should receive collateral from at least 6 different issues, with no issue exceeding 30% of the fund’s assets.

**REUSE AND REINVESTMENT OF COLLATERAL (CURRENTLY NOT DONE BY ANY FUND)** Cash collateral will not be reinvested unless otherwise specifically permitted for a specific fund in the fund’s descriptions. In that event, cash collateral will either be placed on deposit or invested in high-quality government bonds, reverse repurchase transactions or short-term money market funds (as defined in the Guidelines on a Common Definition of European Money Market Funds) that calculate a daily net asset value and are rated AAA or equivalent. Such reinvestment will be taken into account for the calculation of each concerned fund’s global exposure relating to derivative instruments, in particular if it creates a leverage effect. All investments must meet diversification requirements disclosed above.

If a fund invests collateral from **Securities lending** in reverse repurchase transactions, the limits that apply to **Securities lending** will extend to reverse repurchase transactions.

Non-cash collateral will not be sold, reinvested or pledged.

**CUSTODY OF COLLATERAL** Collateral (as well as other securities that can be held in custody) transferred by title to a fund will be held by the depositary or a sub-custodian. With other types of collateral arrangements, such as a pledge agreement, collateral can be held by a third-party custodian that is subject to prudential supervision and is unrelated to the collateral provider.

**VALUATION AND HAIRCUTS** All collateral is marked to market (valued daily using available market prices), taking into account any applicable haircut (a discount to the value of collateral intended to protect against any decline in collateral value or liquidity). A fund may demand additional collateral (variation margin) from the counterparty to ensure that the collateral value at least equals the corresponding counterparty exposure.

The haircut rates currently applied by the funds are shown below. The rates take account of the factors likely to affect volatility and risk of loss (such as credit quality, maturity and liquidity), as well as the results of any stress tests which may be performed from time to time. Haircuts will not be applied to cash collateral. The Management Company may adjust these rates at any time, without advance notice, but incorporating any changes into an updated version of the prospectus.

The value of collateral received should, during the duration of the contract, be at least equal to 105% of the global valuation of the securities lent in the case of equities and at least 102% of the total value of the securities lent in the case of bonds. Repurchase agreement and reverse repurchase agreements will generally be collateralised, at any time during the lifetime of the agreement, at a minimum of 100% of their notional amount.

		Allowable as collateral	Haircut
OTC Derivative transactions	Financial	Cash (USD, EUR, GBP, AUD or JPY)	0%
	Securities Lending transactions - Equity	Government issued by sovereigns	bonds G10 5%
Securities Lending transactions - Bond		Government issued by sovereigns	bonds G10 2%
Reverse repurchase transactions		Specified sovereign debt or exposure to certain non-government public - sector entities (in certain currency denominations) as agreed on a fund/counterparty basis	Up to 2.818% (as applicable by regulation and residual maturity)

## Money Market Fund Regulation

**LEGAL AND REGULATORY FRAMEWORK** The money market fund regulation (officially Regulation (EU) 2017/1131 of the European Parliament and of the Council of 14 June 2017 on money market funds) applies to all money market funds domiciled or offered in the EU. The regulation seeks to make money market funds more resilient and to ensure that they are able to maintain liquidity during stressed market situations and substantial or sudden redemptions.

**TYPES OF MONEY MARKET FUNDS** The regulation permits funds in the following categories:

Type of fund	Short-term	Standard
Public debt constant NAV	●	—
Low volatility NAV	●	—
Variable NAV	●	●

## PORTFOLIO RULES

Cash funds qualify as Short-Term Variable Net Asset Value Money Market Funds, and shall comply on an ongoing basis with all of the following requirements:

- its portfolio is to have a WAM of no more than 60 days; and
- its portfolio is to have a WAL of no more than 120 days.
- at least 7.5 % of the total net assets of a Cash Fund are to be comprised of daily maturing assets, reverse repurchase agreements which are able to be terminated by giving prior notice of one working day, or cash which is able to be withdrawn by giving prior notice of one working day.
- at least 15 % of its total net assets of a Cash fund are to be comprised of weekly maturing assets, reverse repurchase agreements which are able to be terminated by giving prior notice of five working days, or cash which is able to be withdrawn by giving prior notice of five working days. For the purpose of such calculation, money market instruments or units or shares of other Money Market Funds may be included within the weekly maturing assets of the relevant Cash fund up to a limit of 7.5 % of its total net assets provided they are able to be redeemed and settled within five working days.

If the limits referred to under this paragraph are exceeded for reasons beyond the control of the relevant Cash fund, or as a result of the exercise of subscription or redemption rights, that fund shall adopt as a priority objective the correction of that situation, taking due account of the interests of the shareholders.

## CREDIT AND STRESS TESTING PROCEDURES

### Description of the procedure

Consistent with the MMF Regulation and the relevant delegated acts supplementing it, the Management Company will ensure that a customised internal credit quality assessment procedure based on prudent, systematic and continuous assessment methodologies for systematically determining the credit quality of the funds that qualify as money market funds, is established, implemented and consistently applied. The Management Company has approved four separate credit quality assessment procedures (i) sovereign issuers, (ii) government related issuers, (iii) financial corporate issuers and (iv) non-financial corporate issuers.

The oversight of the internal credit quality assessment procedures will lie with the Management Company which will be assisted by the Fixed Income Investment Risk Committee (the "FIIRC"), which is an independent committee responsible for fixed income risk oversight. FIIRC and ultimately the Management Company is responsible for ensuring that data used in the credit quality assessments is of sufficient quality, up-to-date and from reliable sources.

A credit assessment for all issuer and guarantors on the approved list will be produced, in accordance with the regulations at least annually by the assigned analyst. FIIRC is responsible and ultimately the Management Company for ensuring that the annual frequency requirement is met. FIIRC and ultimately the Management Company will be responsible for deciding whether a material change has occurred and analysts will need to prepare a new credit assessment for affected issuers or guarantors.

When determining the credit quality of an issuer and of an instrument, the Management Company will ensure that there is no mechanistic over-reliance on external ratings.

The appropriateness of the credit quality assessment procedures will be assessed annually (or more often if necessary) and changes thereto will be approved by senior management and/or the Management Company. In case there is a material change, within the meaning of the Money Market Fund Regulation that could have an impact on the existing assessment of an instrument, a new credit quality assessment will be performed. In addition, the internal credit quality assessment procedure is monitored on an ongoing basis.

### Description of the methodology

A list of eligible issuers (known as "Approved List") is maintained and the money market funds are only allowed to invest into instruments from issuers that are on this list. Each of the issuer on the list is assigned to an analyst in the credit research team.

An effective process has been established by the Management Company to ensure that relevant information on the issuer and instrument's characteristics are obtained and kept up-to-date.

Determination of credit risk of an issuer or guarantor and its instruments will be solely made by the assigned analyst under the responsibility of the Management Company and will be based on an independent analysis of the issuer's or guarantor's ability to repay its debt obligations. This determination follows a systematic four step process designed in accordance with Chapter 3 of the delegated regulation 2018/990 and paragraph 1 of Article 20 of the Regulation. An issuer or guarantor and its instruments must pass each of the four steps. These steps may include the following elements, where applicable:

- i. Quantitative factors: issuers must meet or exceed pre-determined thresholds on quantitative metrics such as financial ratios and macro-economic performance (such as but not limited to capitalisation, liquidity, asset quality, profitability, leverage, adjusted EBITDA/interest, liquidity sources, GDP per capita, unemployment rate, world bank government effectiveness score, bank non-performing loan ratio, government interest expense to government revenues.
- ii. External and market based factors: issuers must pass thresholds relating to bond or CDS spreads of relevant instruments as well as having an external credit rating of at least A3 or A- with Moody's and/or Standard & Poors.
- iii. Qualitative factors: assigned analyst considers qualitative factors (such as but not limited to governance, business model, risk profile, macro backdrop, diversification, government stability, government plans, currency strength), that deem to be necessary for a comprehensive and prudent credit quality assessment of the issuer or guarantor.
- iv. Instrument specific factors: assigned analyst considers instrument specific factors (such as but not limited to whether the instrument is a direct and unconditional payment obligation, the degree of flexibility over the timing of interest and principal payments, the payment rank of the instrument, and its liquidity profile), that deem to be necessary for instrument to be considered of high credit quality and liquidity.

For government related issuers and guarantors a different approach is used. The main driver of the credit quality for government related issuers or guarantor is the strength of the link between the government related issuer or guarantor and the sovereign. Therefore, the assessment focus on the strength of this link (such as ownership, explicit or implicit guarantees, barriers to support, client relationships, exposure to common risks, economic importance, classification by rating agencies, etc) and a favourable assessment is given if the probability of default of the government related issuer deems to be closely linked to the sovereign.

Only if an issuer or guarantor and its instruments passes all stages of the procedure it will receive a favourable assessment and will be on the approved counterparty list.

A credit assessment for all issuers or guarantors on the approved counterparty risk will be conducted at least annually and made available to the senior management and/or the Management Company at least annually.

Data used in the credit quality assessment are all from reliable sources, including (but not exhaustively) from Bloomberg, credit rating agencies, Haver Analytics, the international monetary fund (the "IMF"), and directly from official company reports. Furthermore, the methodologies used are validated with a comprehensive back-test using Moody's default data to ensure the criteria used to assess credit quality remain robust.

**PROHIBITION ON EXTERNAL SUPPORT** No fund that is an MMF receives any direct or indirect support from a third party, including the sponsor of the MMF. This extends to cash injections, the purchase of portfolio assets at an inflated price, the issuing of a guarantee, or any other action whose intention or effect would be to guarantee the liquidity of the MMF or the stability of its NAV.

**OTHER REQUIREMENTS** Other requirements of the money market fund regulation are described in the section "General Investment Powers and Restrictions".

# Investing in the Funds

## Share Classes

Within each fund, the SICAV can create and issue share classes. All share classes within a fund invest commonly in the same portfolio of securities and confer the same rights of ownership and exposure to investment results, but some share classes may have different fees, investor eligibility requirements and other characteristics, to accommodate the needs of different investors. Investors will be asked to document their eligibility to invest in a given share class, such as proof of institutional investor or non-US person status, before making an initial investment.

Each share class is identified first by one of the base share class labels (described in the table below) and then by any applicable

supplemental labels (described in the following table). For example, "A CDIST(G) GBP" would indicate Class A shares that intend to make an annual distribution from gross income and capital and are denominated in UK pounds sterling.

The maximum fees and minimum investment amounts for all classes are shown in the table below. Maximum fees for specific share classes of each fund are shown in the information for each fund.

Not all share classes may be available in a given jurisdiction. For a current and complete list of share classes available in your jurisdiction, go to [fidelityinternational.com](https://www.fidelityinternational.com) or your Distributor or intermediary.

## Share class characteristics See notes below table

Class	Available to	Asset Class	Min. Investment (USD) <sup>1</sup>		Max. Dealing Fees			Max. Annual Fees		
			Initial	Subsequent	Entry	CDSC	Exit	Management	Distribution <sup>2</sup>	Administration
A	All investors	Multi-Asset	6,000 <sup>13</sup>	1,500	5.25%	—	1.00%	1.50% <sup>14</sup>	—	0.35
		Other funds	2,500	1,000	5.25%	—	—	1.50%	—	0.35
C	All investors	All	2,500	1,000	—	—	—	1.50%	1.00%	0.35
D	Institutions in certain countries Investors permitted by the Board, the management company, or their respective delegates	All	2,500	1,000	4%	—	—	1.50%	0.50%	0.35
E	All investors	All	2,500 <sup>13</sup>	1,000	—	—	1.00%	1.50% <sup>14</sup>	0.80%	0.35
I <sup>5</sup>	Institutional investors that meet the requirements set by the general distributor	All	10 million	100,000	1.00%	—	1.00%	1.00%	—	0.05
NP	. The class NP of Shares is designed principally for investment of assets of Institutional Investors such as feeder funds of the FIL Group or who meet the requirements of the General Distributor	All	20 million	100,000	1.00%	-	1.00%	0.80%	-	0.05%
P <sup>4</sup>	Institutional investors that are pension funds or are investing in pension-related assets and that meet the requirements set by the general distributor	All	1 million	1,000,000	1.00%	—	1.00%	0.80%	—	0.05
R	Investors that meet the requirements set by the general distributor Investors permitted by the management company	All	100 million	1 million	—	—	1.00%	0.80%	—	0.05
RA	As for R	All	100 million	2,500	5.25%	—	1.00%	1.50%	—	0.35
RY	As for R	All	150 million	2,500	—	—	1.00%	0.80%	—	0.20
SE <sup>5</sup>	Institutional investors that meet the requirements set by the general	All	30 million	100,000	—	—	1.00%	0.80%	—	0.35



	distributor or at the discretion of the management company									
<b>SR<sup>6</sup></b>	Reserved for Central Provident Fund (CPF) Investment in Singapore	All	2,000	1,000	—	—	—	1.30%	—	0.35
<b>W</b>	Financial institutions remunerated exclusively by their clients and who have a separate fee - based advisory arrangements or who provide independent advice or discretionary portfolio management Investors permitted by the Board, the management company, or their respective delegates		2,500	1,000	—	—	—	1.00%	—	0.20
<b>X</b>	Investors that meet the requirements set by the general distributor Investors permitted at the discretion of the management company	All	By agreement	100,000	—	—	—	See below <sup>7</sup>	—	0.05
<b>Y</b>	Financial institutions remunerated exclusively by their clients and who have a separate fee - based advisory arrangements or who provide independent advice or discretionary portfolio management Investors permitted by the Board, the management company, or their respective delegates	Other funds	2,500	1,000	—	—	—	1.00%	—	0.20
<b>T</b>	Italian and Maltese retail and wholesale investors <sup>8</sup>	Multi Asset	EUR 1,000	EUR 1,000	See below <sup>9</sup>	2.5% <sup>10</sup>	—	1.25% <sup>11</sup>	0.80% <sup>12</sup>	0.35%

## NOTES

<sup>1</sup> Min. Investment (USD) Or equivalent in any other freely convertible currency.

<sup>2</sup> This fee is accrued daily and payable quarterly to the General Distributor.

<sup>3</sup> The Board may, in its absolute discretion, delay the acceptance of any subscription/purchase for class I Shares until such date as it has received sufficient evidence of the qualification of the investor as an Institutional Investor. If it appears at any time that a holder of class I Shares is not an Institutional Investor, the Board will switch such Shares into class A Shares in the relevant fund (or in another fund with a similar investment policy if the relevant fund does not issue class A Shares) and notify the relevant shareholder of such switch. Some classes of Shares having the same characteristics as class I Shares may be offered in certain jurisdictions and for certain investors under the label "S" Shares

<sup>4</sup> A sales exit fee or a redemption fee of up to 1.00% of the Net Asset Value inclusive of expenses can be levied on class P Shares, either of which fee will revert to the General Distributor. Class P shares are not available through clearing houses.

<sup>5</sup> The annual management fee shall be applicable to Class SE Shares for a period of 18 months (or for a longer period at the Management Company's or General Distributor's discretion as notified to shareholders) after the Launch Date of the relevant fund. Following the expiry of that period, Class SE Shares are subject to fees agreed between the Management Company and the relevant shareholders, which will not be greater than the annual management fee specified for the corresponding Class I Shares of the relevant fund. Except as otherwise designated class SE shares are distributing classes.

<sup>6</sup> Except as otherwise designated class SR shares are distributing classes.

<sup>7</sup> A management fee, is levied and collected by the Management Company or a Connected Person directly from clients of Fidelity International who enter into specific agreement with the Management Company or a Connected Person. No management fee is payable in respect of Class X Shares out of the net assets of the relevant fund. Class X Shares will bear their pro-rata share of the fees payable to the depositary as well as of other charges and expenses as further described in "Fund fees and costs".

<sup>8</sup> For Global Multi Asset Thematic 60 Fund and Global Multi Asset Selection 80 Fund, information is described in "Fund Descriptions".

<sup>9</sup> An entry fee of up to 5.25% will apply after a period of five years following the Launch Date of Global Multi Asset Thematic 60 Fund. An entry fee of up to 5.25% will apply after a period of three years following the day immediately after the expiry of the Initial Subscription Period of Global Multi Asset Selection 80 Fund.

<sup>10</sup> For Global Multi Asset Thematic 60 Fund a contingent deferred sales charge is levied on T shares set at a maximum 2.5% if redeemed within the first year of purchase, 2% if redeemed within the second year, 1.5% if redeemed within the third year, 1% if redeemed within the fourth year, 0.5% if redeemed within the fifth year and 0% thereafter.

For Global Multi Asset Selection 80 Fund, a contingent deferred sales charge is levied on T shares set at a maximum 2.4% if redeemed within the first year of the date of subscription or the day immediately following the expiry of the Initial Subscription Period whichever is the later, 1.6% if redeemed within the second year, 0.8% if redeemed within the third year and 0% thereafter.

<sup>11</sup> For Global Multi Asset Thematic 60 Fund, for class T shares, the management fee will be increased to 1.00% on 25th May 2024, and to 1.25% on 25th May 2026.

For Global Multi Asset Selection 80 Fund, for class T shares, the management fee will equal to 0.30% during the Initial Subscription Period. It will be increased to 0.90% on 11 December 2023, to 1.00% on 11 December 2024 and to 1.25% on 11 December 2025.

<sup>12</sup> Class T Shares are subject to an annual distribution fee of up to 0.80% of the Net Asset Value of the relevant class. For Global Multi Asset Thematic 60 Fund this fee is accrued daily and will only apply during the first five years from the Launch Date. For Global Multi Asset Selection 80 Fund this fee is accrued daily and will only apply during the first three years after the expiry of the Initial Subscription Period.

<sup>13</sup> EUR 100 for Global Multi Asset Thematic 60 Fund and Global Multi Asset Selection 80 Fund.

<sup>14</sup> For Global Multi Asset Thematic 60 Fund, for class A and E shares, the management fee will be increased to 1.20% on 25th May 2024, and to 1.45% on 25th May 2026.

For Global Multi Asset Selection 80 Fund, for class A and E shares, the management fee will be increased to 1.20% on 11 December 2024, and to 1.45% on 11 December 2025

## Supplemental labels

Suffixes are added after the base share class designation to indicate certain characteristics and may be used in combination with each other. For more about ACC and DIST shares, see "Distribution Policy" below.

**ACC** Indicates that the shares accumulate all interest and other income earned.

**DIST** Indicates that the shares are distributing shares. The Board expects to recommend distribution of substantially all of the net income (or gross income where the suffix G is used) of the share class. The Board may also determine to what extent distribution will be made from capital, when applicable. For distributions out of capital, investors should refer to the Risk Factors section "Distribution out of capital risk".

**Type of distribution**

- **C** distributions may include both substantially all of the net income and to some extent capital, with the expectation of achieving a higher distribution rate than an INCOME class. Such distributions are not fixed and are reviewed periodically by the Board according to economic and other circumstances
- **G, (G)** gross income
- **H** suffix used in respect of distributing hedged shares. Such distributions may include a premium when the interest rate of the hedged currency is higher than the fund's reference currency interest rate. Consequently, when the interest rate of the hedged currency is lower than the fund's reference currency interest rate, the dividend may be discounted.
- **INCOME** The Board expects to recommend distribution of substantially all of the net income of the share class and on occasion to some extent capital to maintain so far as reasonable, a stable dividend per share to maintain a stable distribution amount. Such distributions are not fixed and are reviewed periodically by the Board according to economic and other circumstances and the ability of the funds to support the distribution without a long-term positive or negative impact on capital.

**(hedged)** These shares seek to cancel out most of the effect of exchange rate fluctuations between the share class currency and either the currency(ies) represented in an index or the currency(ies) to which a major portion of the portfolio's holdings are exposed (in some cases, this is limited by the number of freely exchangeable currencies involved).

**[(currency 1/currency 2)] hedged)** These shares seek to cancel out most of the effect of exchange rate fluctuations between the share class currency and the base currency of the fund. These shares may have a higher level of leverage than shares without this type of hedging.

For more on currency hedging, see "How the Funds Use Instruments and Techniques".

If neither of the above suffixes appear, the shares are not currency hedged in any way and the investor is exposed to any fluctuations in exchange rates between the share class currency, fund base currency, and portfolio currencies.

**PF** Indicates that the shares are subject to a performance fee.

**Frequency of distribution**

- **M** monthly, dividends are declared on the first business day of each month
- **Q** quarterly, dividends are declared on the first business day of February, May, August, and November

If the suffixes M or Q are not used, the dividends are declared annually, normally on the first business day of August.

See "Distribution policy" below.

**CURRENCY CODES** Each share class that is not denominated in the fund's base currency carries a 3-letter code for the currency in which it is denominated. If no such code appears, the share class currency is the same as the fund base currency.

**Dividends**

**ACCUMULATION SHARES** These shares retain income in the fund.

**DISTRIBUTING SHARES** These shares make periodic distributions to shareholders.

Dividends (if any) are normally paid within 5 business days of declaration or as soon as practicable thereafter.

Dividends paid may include capital, which will be attributable to the relevant class of Shares and will reduce capital appreciation for the holders of such Shares. To the extent that net income attributable to these Shares exceeds the amount declared payable, the excess amount will be reflected in the respective Net Asset Value of such Shares. Alternatively, the amount of dividend may exceed the aggregate amount of net investment income and net capital gain. Accordingly, the level of dividend does not necessarily indicate the total return of the fund. In order to assess the total return of the fund, both the Net Asset Value movement (including dividend) and the dividend distribution should be considered. Where share classes seek to maintain stable dividends, the funds are managed in line with the stated investment objectives and are not managed to maintain a stable payment per Share on any particular Share class. The Board may also determine if and to what extent dividends may include distributions from realized and unrealized capital gains as well as from capital.

In the event of distribution of gross investment income, charges will be deducted from the assets of the relevant class of shares. This will enhance income returns but may constrain capital growth.

Where the payment of the dividend amount per class of shares accrued between the launch date and the first scheduled distribution date would not be economically efficient, the Board may defer this payment to the next distribution date.

Dividends are paid only on shares that were owned as of the declaration date.

**Options for receiving distributions Investors have two options:**

- Automatic reinvestment in the same class of shares, with no entry fee, at the NAV for the dividend declaration date (or if not a Valuation Day, for the next day that is). Shares are calculated to two decimal places, with any remainder added to the next distribution.
- Upon your request, by electronic transfer to your bank account on file, in the Principal Dealing Currency of the relevant share class net of bank charges. Note that any dividend payments of less than USD 50 (or equivalent in another currency) will be reinvested in further shares unless this is prohibited by applicable local regulations, or otherwise decided by the Board.

No interest is paid on unclaimed dividend payments, and after 5 years unclaimed dividends will be forfeited and returned to the fund. No fund will make a dividend payment if the assets of the SICAV are below the minimum capital requirement, or if paying the dividend would cause that situation to occur.

**INCOME EQUALISATION** For both accumulation and distribution shares, each fund applies equalisation to help ensure that income allocations per share are not affected by changes in the number of shares in issue. It is expected that the equalisation amount will not be taxable as an income receipt of the shareholder but should be applied to reduce the base acquisition cost of the Shares for the purpose of computing capital gains. The tax treatment of equalisation amounts may, however, differ in certain jurisdictions. Further information on the equalisation amount received as a part of a distribution, may be obtained by contacting the Distributor or the Management Company.

## Issuance and ownership

**FORMS IN WHICH SHARES ARE ISSUED** We issue shares in registered form. With these shares, the owner's name is recorded in the SICAV's register of shareholders and the owner receives a confirmation of subscription. Ownership can only be transferred by notifying the transfer agent of a change of ownership. Forms for this purpose are available by contacting your distributor or the management company.

Documentation of ownership of shares is available on request and will be sent out approximately 4 weeks after we receive a request and all applicable monies and shareholder documentation have been received. We do not issue bearer shares or share certificates.

**INVESTING THROUGH A NOMINEE VS. DIRECTLY WITH THE SICAV** If you invest through an entity that holds your shares under its own name (a nominee account), that entity is recorded as the owner in the SICAV's register of shareholders and, so far as the SICAV is concerned, is entitled to all rights of ownership, including voting rights. Unless otherwise provided by local law, any investor holding shares in a nominee account with a distribution agent has the right to claim, at any time, direct title to shares subscribed through the nominee. The nominee maintains its own records and provides each investor it serves with information as to the holdings and transactions in fund shares associated with that investor.

## Other policies

Shares are issued to one one-hundredth of a share (2 decimal places). Fractional shares receive their pro rata portion of any dividends, reinvestments and liquidation proceeds, but do not carry voting rights.

Shares carry no preferential or preemptive rights. No fund is required to give existing shareholders any special rights or terms for subscribing for new shares. All shares must be fully paid up.

## Fund Fees and Costs

Except for entry, exit and exchange fees, the fees and expenses described below are deducted from fund assets. Fee rates are presented in "Fund Descriptions" or in the tables in "Share Classes" above.

### Management fee

This fee is accrued daily and paid each month in arrears, normally in USD.

The management fee may be increased in respect of any one or more funds or share classes from time to time. The fee may be increased in respect of any one or more funds from time to time, provided the fee does not exceed an annual rate of 3% (excluding any performance fee) of the NAV of the fund. Any such increase is subject to due notice being given to shareholders and an amendment to the prospectus. The management fee may be waived in whole or part in respect of any fund or Share Class. The management fee may be used to remunerate the Management Company, the Investment Manager, Connected Persons, intermediaries, and any other entity to which has been sub-delegated investment management activities for services performed by them for the SICAV.

### Depositary and Administration fees

The SICAV pays a fee to the depositary. The depositary fee will typically range from 0.003% and 0.35% of the SICAV's net assets (varying depending on the markets in which the SICAV is invested)

excluding transaction charges and reasonable disbursements and out-of-pocket expenses.

The SICAV has appointed FIL Investment Management (Luxembourg) S.A as the Management Company of the SICAV, under a Management Company Services Agreement dated 1 July 2011. The Management Company and the SICAV have appointed FIL Limited, under a services agreement dated 1 July 2011 to provide services in relation to the investments of the funds including valuation, statistical, technical, reporting and other assistance. The Management Company and/or FIL Limited has outsourced certain administration services to other Fidelity group entities.

The SICAV pays an administration fee for the services noted in the Management Company Services Agreement and the Services Agreement at commercial rates agreed from time to time between the parties plus reasonable out-of-pocket expenses. The maximum administration fee paid for these services by the SICAV will be 0.35% of the net assets (excluding reasonable out-of-pocket expenses).

## Entry and exit fees

These fees are described either in "Fund Descriptions" or in the tables above and are paid to the general distributor for sales activities and ongoing client service and as a source of funds for the general distributor to cover the sales and client service fees of other distributors, including financial intermediaries or institutions. The initial sales charge may be shared by the general distributor with distributors, Intermediaries and other agents

## Switch fee

This fee is described on page 49 and is paid to the general distributor, who may decide to remit it to the fund(s) in question to cancel or reduce any effects of exchanges on the remaining shareholders.

## Distribution fee

The Management Company has appointed the general distributor to assist in the promotion of the SICAV. A Distribution fee on certain Shares Classes, is paid to the general distributor at the rate indicated in the "Main Share Class" section for each fund, for providing distribution-related services to the SICAV and shareholders. This fee is accrued daily and paid monthly to the general distributor.

The general distributor passes on some or all of the distribution fee to distributors, intermediaries and other agents as commission for their services.

## Performance fee

Performance fees are set by the Board and are calculated for each applicable share class and fund. Because of different cost structures and other reasons, fee amounts will often vary from class to class.

The performance fee calculation methodology; and any market index (benchmark) or hurdle rate information applicable to a fund is described below as well as in the Fund Descriptions.

During periods of market volatility, there may be times when performance fee accruals cause a NAV to rise even though portfolio asset values fell, and vice versa.

Fund	Performance Fee	Hurdle Rate	Index	Index Administrator
FAST -Asia Fund	20%	2%	MSCI AC Asia ex Japan Index (Net)	MSCI Limited
FAST - Emerging Markets Fund	20%	2%	MSCI Emerging Markets Index (Net)	MSCI Limited
FAST - Europe Fund	20%	2%	MSCI Europe Index (Net)	MSCI Limited
FAST - Global Fund	20%	2%	MSCI ACWI Index (Net)	MSCI Limited

\*For hedged Share Classes, an appropriate hedged index is used (denominated in the reference currency of the Share Class where available) or where not available, an adjusted unhedged index is used.

The above total return indices (taking into account dividend reinvestment) are calculated following underlying market close, which may be after the valuation time of the fund. In this case, in determining the index performance over the Performance Reference Period (as defined hereinafter), a proxy will be used to calculate index performance between the current day (T) and the previous day (T-1). The proxy will be the price index (without dividend reinvestment) snapped as close as practicable to the valuation time of the fund. In terms of FX, prevailing rates at the valuation time of the relevant fund will be used for conversion of the price index's performance in its reference currency to Share Class currency. This will also apply for hedged Share Classes, but no further adjustment will be made to take into account any performance movement between T and T-1 due to hedging. This enables closer alignment to the client experience than basing the calculation on performance between T-1 and T-2.

The Management Company, the Investment Manager and the relevant index administrator(s) will not be liable (in negligence or otherwise) to any shareholder for any error, delay or change in the provision, availability, composition, calculation or transmission of any index and shall not be obliged to advise any shareholder of the same.

The SICAV, the Management Company and the Investment Manager are not sponsored, endorsed, sold or promoted by the relevant index administrator(s) and the index administrator(s) make(s) no warranty, representation or judgment about the SICAV, the Management Company, the Investment Manager or the use of any index.

The Investment Manager may at its discretion waive any or all of its fees in respect of any fund.

#### **PERFORMANCE FEE METHODOLOGY**

The Investment Manager is entitled to receive a performance fee for certain Share Classes if the NAV per Share of the Share Class, subject to certain adjustments described below, outperforms its index, or hurdle rate over its index, during the Calculation Period (as defined hereinafter).

The use of a relative index model with a hurdle rate, as opposed to a high water mark model, is appropriate in a performance fee methodology for a fund that seeks to achieve a positive excess return relative to an index, as the index has an inherent level of risk relating to the strategy of the relevant fund. The use of a hurdle rate seeks to ensure that investors

will not be charged a performance fee until the Investment Manager has delivered an excess return over the index. It should be noted that where a Share Class has been launched part way through the SICAV's financial year, the hurdle rate will be calculated in proportion to the length of that period.

#### **PERFORMANCE FEE CALCULATION**

The performance fee is calculated on the basis of the NAV per Share, subject to certain adjustments, which include adding back any performance fee accrual, adding back any dividend distributions, removing any fair value market adjustment referred to in section "Asset Valuations", and removing any price adjustment referred to in section "Swing pricing" of the Prospectus, resulting in the "Adjusted NAV per Share", and is also adjusted to take account of the aggregate net dealing transactions (see 'Neutralisation of Subscriptions and Redemptions' below).

The performance fee is equal to the cumulative outperformance of the Adjusted NAV per Share in excess of its index, or hurdle rate over its index (as applicable), since the start of the Calculation Period, multiplied by the performance fee rate, multiplied by the number of Shares in issue, calculated and accrued on each Valuation Day. The performance fee is calculated and accrued for each relevant Share Class as of each Valuation Day.

The performance fee that may be payable ('crystallised') to the Investment Manager is equal to the total performance fee accrual on the last Valuation Day of the SICAV's financial year, subject to the provisions laid out in the 'Calculation Period and 5-years reset (Performance Reference Period)' section below.

If the cumulative outperformance of the Adjusted NAV per Share decreases during the Calculation Period, the provisions made in respect of the performance fee will be reduced accordingly. If these provisions fall to zero, no performance fee will be payable (apart from in the case of crystallisation on aggregate net redemption, see 'Neutralisation of Subscriptions and Redemptions' below).

A performance fee accrual may be made if the Adjusted NAV per Share has outperformed its index, or hurdle rate over its index, even if the Adjusted NAV per Share return is negative.



## PERFORMANCE FEE EXAMPLES

The below examples illustrate hypothetical crystallisation scenarios, assuming a Calculation Period of a financial year, a hurdle rate of 2%, and a performance fee rate of 20%.

Scenario	Cumulative share class performance	Cumulative Index performance	Cumulative share class excess return over Index	Cumulative share class excess return over Hurdle Rate	Performance Fee crystallisation	Performance Fee
1.	+10%	+5%	+5%	+3%	Yes	0.60%
2.	+2%	+5%	-3%	-5%	No	n/a
3.	-2%	-5%	+3%	+1%	Yes	0.20%
4.	-10%	-5%	-5%	-7%	No	n/a

There is no maximum value of performance fee that could become payable to the Investment Manager. Performance fees that may be paid to the Investment Manager in any financial year are not refundable in any subsequent financial years. The Board may make such adjustments of accruals as it deems appropriate to ensure that the accruals represent fairly and accurately the performance fee liability that may eventually be payable by a Share Class of a fund with an index to the Investment Manager.

### CALCULATION PERIOD AND 5-YEARS RESET (PERFORMANCE REFERENCE PERIOD ON A ROLLING BASIS)

The Calculation Period for each fund is equal to the SICAV's financial year, or since launch of the relevant Share Class to the end of the first full financial year. The SICAV's financial year begins on 1st October and ends on 30th September.

In the case of underperformance, the Calculation Period is since launch date, or since the last performance fee crystallisation date, up to a maximum of 5 financial years applied on a rolling basis, referred to as the Performance Reference Period (PRP). PRP is the time horizon over which the performance is measured and compared with that of the index, at the end of which the mechanism for the compensation for past underperformance (or negative performance) can be reset.

As an example of the PRP, assuming a Share Class' last crystallisation is 30-Sep-2021, if no crystallisation takes place at each financial year end up to and including 30-Sep-2026, then, from 01-Oct-2026, the start of the PRP will become 30-Sep-2022, therefore the PRP will be 5 financial years by 30-Sep-2027; any losses between 30-Sep-2021 and 30-Sep-2022 will no longer have to be compensated so as to allow for payment of a performance fee. If there is no performance fee crystallised on 30-Sep-2027, from 01-Oct-2027 the start of the PRP will become 30-Sep-2023, therefore the PRP will be 5 financial years by 30-Sep-2028; any losses prior to 30-Sep-2023 will no longer have to be compensated to allow for payment of a performance fee. If, however, crystallisation occurs on 30-Sep-2027, that will

become the start of the next Calculation Period from 01-Oct-2027.

In the case of liquidation or merger of a fund or Share Class to which a performance fee is applicable, the performance fee should be crystallised on the last Valuation Day before the liquidation or merger of the relevant fund or Share Class.

### NEUTRALISATION OF SUBSCRIPTIONS AND REDEMPTIONS

In case of subscription, the performance fee calculation is adjusted to avoid that this subscription impacts the amount of performance fee accruals. To perform this adjustment, the outperformance of the Adjusted NAV per Share over its index, or hurdle rate over its index, until the subscription date is not taken into account in the performance fee calculation. This adjustment amount is based on the number of subscribed Shares multiplied by the positive difference between the NAV per Share on the subscription date versus the Adjusted NAV per Share as of the last crystallisation date, or the initial NAV per Share, or the start of the PRP, adjusted by the index, or hurdle rate over its index at the date of the subscription. This cumulated adjustment amount is used in the performance fee calculation until the end of the Calculation Period, which can be extended to a maximum PRP of five years, and is adjusted in case of subsequent redemptions during the Calculation Period.

Where a subscription occurs when there is cumulative underperformance for the relevant Share Class, that subscription will benefit from a 'free ride' since any prior underperformance will need to be recovered before a performance fee can be accrued.

If Shares are redeemed during the Calculation Period on any Valuation Day when there is a positive performance fee accrual, any performance fee accrual in respect of those redeemed Shares will crystallise on that Valuation Day, but will not be paid to the Investment Manager until the last Valuation Day of the financial year, or the last Valuation Day of the first full financial year in the case of a newly launched Share Class.

**Charges and Expenses** The following costs and expenses may be charged to the SICAV, any of which may be permanently or temporarily waived or borne by the Investment Manager.

- fees of the Management Company, remuneration of any employees or officers of the SICAV, the Investment Manager, any paying agent, the Hong Kong representative and of representatives in other jurisdictions where the Shares are qualified for sale, and of all other agents employed on behalf of the SICAV; such remuneration may be based on the net assets of the SICAV or on a transaction basis or may be a fixed sum;
- Fund formation expenses;
- the cost of preparing, printing and publishing in such languages as are necessary, and distributing offering information or documents concerning the SICAV, annual and semi-annual reports and such other reports or documents as may be desirable or required under laws or regulations applicable to the SICAV or the offering of Shares;
- the cost of printing certificates and proxies;
- the cost of preparing and filing the Articles of Incorporation and all other documents concerning the SICAV, including registration statements and offering circulars with all authorities (including local securities dealers' associations) having jurisdiction over the SICAV or the offering of Shares;
- the cost of qualifying the SICAV or the sale of Shares in any jurisdiction or of a listing on any exchange;
- the cost of accounting and bookkeeping;
- the cost of calculating the Net Asset Value of Shares of each fund;
- the cost of preparing, printing, publishing and distributing or sending public notices and other communications (including electronic or conventional contract notes) to the shareholders;
- legal and auditing fees;
- registrar's fees;
- all other charges and expense similar to the above;
- costs associated with the required collection, reporting and publication of data about the SICAV, its investments and shareholders;
- costs of publishing fund performance data;
- financial index licensing fees;
- fees for operating hedged share classes;
- duties, taxes and transaction costs associated with buying and selling fund assets;
- brokerage fees and commissions;
- custody, depositary and safekeeping charges;
- valuation, statistical, technical, reporting and other assistance under a services agreement with FIL Limited upon commercial rates agreed from time to time that will not exceed 0.35% of a fund's net assets, plus reasonable out-of-pocket expenses;
- transaction charges, reasonable disbursements and out-of-pocket expenses of the depositary;
- costs of any sub-custodians;
- interest on borrowing and bank charges incurred in negotiating borrowing;
- fees of non-affiliated Board members and incidental expenses of all Board members;
- litigation or tax reclaim expenses;
- any extraordinary expenses or other unforeseen charges.

Administrative and other expenses of a regular or recurring nature may be calculated on an estimated basis for yearly or other periods in advance, and the same may be accrued in equal proportions over any such period.

Costs, charges and expenses which may be attributed to a fund will be borne by that fund; otherwise they will be allocated in US Dollars pro rata to the Net Asset Value of all, or all appropriate, funds on such basis as the Board considers reasonable.

In so far as a fund invests in other UCITS or UCIs which are administered directly or by delegation by the Management Company or another company to which the Management Company is linked by common management or control or by a substantial direct or indirect holding or which is managed by a company in the FIL Group, the fund shall not be charged a subscription fee or a redemption fee.

The Management Company and/or FIL Limited has outsourced certain administration services to other Fidelity group entities.

A portion of commissions paid to selected brokers for certain portfolio transactions may, where permitted by regulation, be repaid to the funds which generated the commissions with these brokers and may be used to offset expenses.

Except as described in the Prospectus, no commissions, discounts, brokerage or other special terms have been granted by the SICAV or the Management Company in relation to Shares issued or to be issued by the SICAV; on any issue or sale of Shares a Distributor (including the General Distributor) may, out of its own pocket or out of the initial charges, if any, pay commissions or other fees and charges on applications received through brokers and other professional agents or grant discounts.

Foreign exchange transactions for investors or the SICAV may be effected on an arm's length basis by or through FIL Group companies from which a benefit may be derived by such companies. Further details on the Foreign Exchange Service can be found at [www.fidelityinternational.com/foreignexchangeservice](http://www.fidelityinternational.com/foreignexchangeservice).

All expenses that are paid from shareholder assets are reflected in NAV calculations, and the actual amounts paid are documented in the SICAV's annual reports.

Recurring expenses will be charged first against current income, then against realised capital gains, and lastly against capital.

Each fund and class pays all costs it incurs directly and also pays its pro rata share (based on net asset value) of costs not attributable to a specific fund or class. For each share class whose currency is different from the base currency of the fund, all costs associated with maintaining the separate share class currency (such as currency hedging and foreign exchange costs) will be charged solely to that share class to the extent practicable.

Expenses are calculated each business day for each fund and class and paid monthly in arrears.

## Buying, Exchanging and Selling Shares

### Information that applies to all transactions except transfers

#### OPTIONS FOR SUBMITTING INVESTMENT REQUESTS

- By contacting your financial advisor, intermediary or distributor
- Via a pre-established electronic platform
- By fax or mail to the Management Company: FIL Investment Management (Luxembourg) S.A. 2a Rue Albert Borschette, BP 2174, L-1246 Luxembourg

**PLACING ORDERS** You can submit orders to buy, switch or sell (redeem) shares at any time, by approved electronic means, or by fax or letter to the Management Company, Distributor, intermediary or transfer agent.

When placing an order, you must include all necessary identifying information, including the account number, and instructions as to the fund, share class, reference currency, and size and type of transaction (buying, switching, or selling).

Normally, the Management Company and/or the relevant Distributor do not accept from, or make payments to, persons other than the registered shareholder or any of the joint shareholders.

In case of joint holding, and unless specifically stated in writing at the time of application, any one of the registered joint shareholders is authorised to sign any documents or to give instructions in connection with that holding on behalf of the other joint shareholders. Such authorisation shall remain in force unless notice of its termination is received under separate cover by the Distributor.

No request will be accepted or processed in any way that is inconsistent with this prospectus.

**CUT-OFF TIMES AND PROCESSING SCHEDULE** Any application to buy, switch or sell shares must be received before the cut-off time shown for each fund in "Fund Descriptions"

Orders that arrive after the cut-off time will only be accepted as of the next cut-off time.

Note that the NAV at which any request is processed cannot be known at the time a request is placed.

A confirmation notice will be issued as follows:

- for purchases, usually within 24 hours of the shares being allocated
- for switches and sales, at the time the applicable NAV is calculated

See "Fund Descriptions" for settlement schedules.

Other dealing cut-off times may be agreed with local Distributors and/or sub-transfer agent(s).

**PRICING** Shares are priced at the NAV for the relevant share class. All requests to buy, exchange or sell shares are processed at that price, adjusted for any charges. Each NAV is calculated in the fund's base currency, then converted, at current market rates, into any currencies of share class denomination. Except for initial offering periods, during which the price is the initial offer price, the share price for a transaction will be the NAV calculated for the day on which the transaction request is processed.

**CURRENCIES** You may place orders in any of the major freely convertible currencies as well as the principal dealing currency of the funds or share classes. Distributors may publish details of other acceptable currencies. Foreign exchange transactions required to handle client purchases/redemptions may be aggregated and will be carried out on an arm's length basis through certain FIL Group companies from which a benefit may be derived by such companies. Settlement must be made in the currency in which the order was placed. Further details on the Foreign Exchange Service can be found at [www.fidelityinternational.com/foreigntaxservice](http://www.fidelityinternational.com/foreigntaxservice).

Further details on the Foreign Exchange Service can be found at [www.fidelityinternational.com/foreigntaxservice](http://www.fidelityinternational.com/foreigntaxservice).

Investors subscribing for Shares direct through the Management Company may only settle in one of the Principal Dealing Currencies of the applicable fund or class.

In case of compulsory redemption of Shares by the SICAV, subject to the conditions set out in the Articles of Incorporation, the relevant investment will be automatically redeemed in the Principal Dealing Currency (unless otherwise specifically decided by the Board or instructed by the relevant shareholder) free from any redemption charge at the Net Asset Value per Share calculated, and the proceeds will be returned to the relevant shareholder's bank account.

**IN SPECIE SUBSCRIPTION OR REDEMPTION** The purchase price, excluding any sales commission, may be paid by contributing to the relevant fund securities consistent with the investment policy and investment restrictions of the relevant fund. This is subject to approval of the Board and all applicable laws and regulations, notably with respect to the issuance of a special

report from the approved statutory auditor of the SICAV, which may also be specifically requested by the Board.

The specific costs for such purchase in specie, in particular the costs of the special report will normally be borne by the purchaser, or a third party.

The SICAV and/or the Management Company shall have the right, if the Board and/or the Management Company so determines, to satisfy payment of the redemption price to any shareholder requesting redemption of any of their Shares in specie (but subject to the consent of the shareholder in the case of Shares valued at less than USD 100,000) by allocating to the holder investments from the pool of assets set up in connection with such class or classes of Shares equal in value (calculated in the manner described in Article 22 of the Articles of Incorporation) as of the Valuation Day on which the redemption price is calculated to the value of the Shares to be redeemed. The nature and type of assets to be transferred in such case shall be determined on a fair and reasonable basis and without prejudicing the interests of the other holders of Shares of the relevant class or classes of Shares and the valuation used shall be confirmed by a special report of the auditor to the extent required by law or regulation or by the Board. The costs of any such transfers shall normally be borne by the transferee.

**LATE OR MISSING PAYMENTS TO SHAREHOLDERS** The payment of a dividend or sale proceeds to any shareholder may be delayed for reasons of fund liquidity, and may be delayed, reduced, or withheld if required by foreign exchange rules, other rules imposed by the shareholder's home jurisdiction, or for other external reasons. In such cases we cannot accept responsibility, nor do we pay interest on amounts withheld.

**INVESTING THROUGH REGULAR INVESTMENT PLANS** If you are investing through a regular investment plan offered by a distributor, platform or other intermediary who we have approved, you must follow the general terms and conditions set by the plan in addition to all applicable terms and conditions in this prospectus. Your investment plan provider is required to provide you with their terms and conditions.

**CHANGES TO ACCOUNT INFORMATION** You must promptly inform us of any changes in personal or bank information, particularly any information that might affect eligibility for any share class. We will require adequate proof of authenticity for any request to change the bank account associated with your fund investment.

## Buying shares

Also see "Information that Applies to All Transactions Except Transfers" above.

For optimal processing of investments, send money via bank transfer (net of any bank charges) in the currency denomination of the shares you want to buy. To make purchases in another currency, contact your Distributor or intermediary in advance.

Investors buying Shares for the first time must complete an application form. The instructions for subsequent purchases should contain full details of registration, the name of the fund(s), class(es) of Shares, settlement currency(ies) and the value of Shares to be bought. Purchase instructions will normally only be settled on banker's notification of receipt of all necessary documentation as well as cleared monies.

The Management Company or Distributors may delay the processing of the applications until receipt of all the documents it may request to comply with the applicable laws and regulations.

If we do not receive full payment for your shares within the time indicated for settlement, we will cancel your transaction and return the payment to you, less any costs incurred in seeking to process your request.

The Management Company and Distributors reserve the right to reject any request to buy shares, whether for initial or additional investment, for any reason.

Note that some intermediaries may have their own account opening and payment requirements.

On certain share classes an initial sales charge is levied. Details of such charges are shown in the Fund Descriptions.

**CONTINGENT DEFERRED SALES CHARGE** On certain share classes there may be a Contingent Deferred Sales Charge ('CDSC') levied on Shares that are redeemed within a certain amount of time after purchase. The following table shows how the rate is calculated for each Share Class that levies this charge.

Share Class			CDSC
Global Thematic T	Multi 60 Fund - Class	Asset	Maximum 2.5% if redeemed within the first year of purchase, 2% if redeemed within the second year, 1.5% if redeemed within the third year, 1% if redeemed within the fourth year, 0.5% if redeemed within the fifth year and 0% thereafter.
Global Selection T	Multi 80 Fund - Class	Asset	Maximum 2.4% if redeemed within the first year of the date of subscription or the day immediately following the expiry of the Initial Subscription Period whichever is the later, 1.6% if redeemed within the second year, 0.8% if redeemed within the third year and 0% thereafter.

Shareholders should note that for the purpose of determining the number of years Shares have been held:

- the anniversary of the date of subscription or the day immediately following the expiry of the Initial Subscription Period (or in the case of the Global Multi Asset Thematic 60 Fund the Launch Date), whichever is the later, shall be used.
- the Shares held the longest period are redeemed first
- the Shares which a shareholder receives upon conversion carry the holding period which corresponds to the holding period of the Shares which were converted.
- when a shareholder switches Shares which have been subscribed at different times to Shares of another fund, the Registrar and Transfer Agent will convert the Shares held for the longest period.

Shares acquired by reinvestment of distributions will be exempt from the deferred sales charge in the same manner as the deferred sales charge will also be waived on redemption of Class T arising out of death or disability of a shareholder or all shareholders (in the case of a joint Shareholding).

The amount of any deferred sales charge is calculated by reference to the current NAV or the NAV prevailing on the day immediately following the expiry of the Initial Subscription Period (or in the case of Global Multi Asset Thematic 60 Fund the NAV of the Launch Date) whichever is the lower.

In determining whether a deferred sales charge is payable on any redemption, the fund will first redeem Shares not subject to any deferred sales charge and then Shares held longest during the deferred sales charge period. Any deferred sales charge due will be retained by the General Distributor which is entitled to such deferred sales charge.

## Switching shares

Also see "Information that Applies to All Transactions Except Transfers" above.

You may switch between funds, share classes, or both, within the SICAV in the following circumstances:

- from Class A to any other fund share class for which the exchange meets the minimum investment requirements of the new fund or class
- for classes E and I from any fund to any other fund, within the same share class.

- for classes R, RA, and RY, a switch may only occur in certain circumstances and at the discretion of the Management Company
- with the approval of the Board or its delegate, subject to meeting the eligibility requirements of the Prospectus and equal treatment of any shareholders requesting a switch from the same class on the same Valuation Day
- as may otherwise be permitted by the Management Company on a case-by-case basis

All switches are subject to the following conditions:

- you must meet all minimum investment requirements (initial or subsequent, as the case may be) for the share class into which you are switching
- you can only switch into a share class that is offered in your jurisdiction as at the date of the switch
- if you paid no entry fee on the shares being switched, we may charge you up to the full entry fee for the shares into which you are switching; if you did pay a sales charge, we may charge a switch fee of up to 2%. At the discretion of the General Distributor such switching fee may revert to the funds.
- Switching fees will be applied to all switches (where applicable) between funds and between classes of Shares within a fund.
- we will switch without a currency conversion if possible; otherwise, any necessary currency conversion will be processed on the day the exchange occurs, at that day's applicable rate. The number of Shares will be rounded up or down to the nearest onehundredth of a Share.
- any exchange that does not leave in the original account that account's minimum holding will be treated as order to close the account
- A switch from a CDSC share class may only be made to the same CDSC share class of another fund, and in the case of the class T shares, provided that such switch occurs after the end of the respective CDSC period of each fund.

**AMOUNTS TO BE SWITCHED** The minimum value of a shareholding in any one fund must amount to the minimum initial investment. Shareholders must therefore switch the appropriate minimum initial investment or, where investing in a fund where they have an existing shareholding, the appropriate minimum subsequent investment. When switching a partial holding, the minimum value of the remaining holding should equate to the minimum initial investment.

**PRICE** Switching instructions received on a day that the Distributors or the Management Company are open for business before the appropriate dealing cut-off times on a Valuation Day, are dealt with at the Net Asset Value calculated that day for each of the relevant funds. Switching instructions received before the relevant dealing cut-off times on a day which is not a Valuation Day for one or both funds will be executed on the next Valuation Day for that fund. If a shareholder switches from a fund with a 4.00pm Central European Time (3.00 pm UK time) dealing cut-off point into a fund with an earlier cut-off point of 1.00pm Central European Time (12.00 noon UK time), the Buy side of the switch may be dealt with at the Net Asset Value calculated on their respective next following Valuation Day.

Because a switch is considered two separate transactions (a simultaneous redemption and subscription) it may create tax or other implications. The purchase and sale components of an exchange are subject to all terms of each respective transaction.

## Selling shares

Also see "Information that Applies to All Transactions Except Transfers" above.

Note that any redemption proceeds will only be paid out once all investor documentation has been received, including any requested in the past that was not adequately provided.



We pay redemption proceeds only to the shareholder(s) identified in the SICAV's register of shareholders, by wire to the bank account details we have on file for the account. If any required information is missing, your request will be held until it arrives and can be properly verified. All payments to you are made at your expense and risk.

## Transferring shares

As an alternative to selling, you may transfer ownership of your shares to another investor. Note, however, that all of the ownership eligibility requirements for your shares apply to the new owner (for example, institutional shares cannot be transferred to non-institutional investors) and if a transfer to an ineligible owner occurs, the Management Company will either void the transfer, require a new transfer to an eligible owner, or forcibly redeem the shares.

## How We Calculate NAV

### Timing and formula

The NAV of each fund and share class is calculated on each Valuation Day, in accordance with the Articles of Incorporation. The NAV of each fund is calculated in the Base Currency of the fund and for each share class its principal dealing currency. NAVs for money market funds are rounded to the nearest four decimal places and are available on a daily basis at [fidelityinternational.lu](https://www.fidelityinternational.lu).

The NAV per Share of each fund, and, if applicable, of each class of Shares of such fund, is calculated by determining first, if appropriate, the proportion of the net assets of the relevant fund attributable to each class of Shares, where appropriate taking account of any ongoing distribution charge payable.

To calculate NAV for each share class we use the following general formula:

$$\frac{(\text{assets} - \text{liabilities}) \text{ per share class}}{\text{number of outstanding shares}} = \text{NAV}$$

In calculating the NAV appropriate provision is made for charges and fees attributable to each fund and share class.

## Asset Valuations

In general, we determine the value of each fund's assets as follows. Note that for any type of security, we may use different value methods in accordance with generally acceptable valuation principles instead of the method stated here (see description following the bullets).

### For funds other than Cash funds

- **CASH IN HAND OR ON DEPOSIT, BILLS, DEMAND NOTES, ACCOUNTS RECEIVABLE, PREPAID EXPENSES, AND CASH DIVIDENDS AND INTEREST DECLARED OR ACCRUED BUT NOT YET RECEIVED.** Valued at the full value, unless the same is unlikely to be paid or received in full, in which case the Board or its delegate shall apply such discount as it may consider appropriate to reflect the true value thereof.
- **MONEY MARKET INSTRUMENTS.**
  - Non-money market funds** Valued as described in the bullet immediately above.
  - Money market funds** Valued at mark-to-market or, that is not possible, mark-to-model.
- **TRANSFERABLE SECURITIES, MONEY MARKET INSTRUMENTS AND DERIVATIVES THAT ARE TRADED ON AN OFFICIAL STOCK EXCHANGE OR OTHER REGULATED MARKET.** Valued on the basis of the last available price of the relevant stock exchange or market on which these securities are traded. Where such securities or instruments are traded on more

than one exchange or market the Board or its delegate shall adopt policies to determine the order of priority of the exchanges or markets that shall be used for valuation

- **SECURITIES OR INSTRUMENTS WHICH ARE NOT LISTED OR FOR WHICH THEIR LAST AVAILABLE PRICE IS NOT REPRESENTATIVE OF THEIR FAIR MARKET VALUE.** The Board or its delegate shall use the reasonably foreseeable sales price valued with prudence in good faith.
- **SHARES OR UNITS OF UCITS OR UCIs.** Valued at the last available NAV reported by the UCITS/UCI.
- **LIQUID ASSETS AND MONEY MARKET INSTRUMENTS** may be valued at nominal value plus any accrued interest at mark-to-market or mark-to-model, or on an amortised cost basis under certain limited conditions (including for instruments with low residual maturities when deemed allowed to gain an appropriate approximation of the price of the instrument) provided that escalation procedures are in place to ensure corrective actions are promptly taken when the amortised cost no longer provides a reliable approximation of the price of the instrument. All other assets, where practice allows, may be valued in the same manner
- **UNLISTED SECURITIES AND ALL OTHER ASSETS.** Valued in accordance with market practice.

### For Cash funds

- **CASH ON HAND OR ON DEPOSIT, BILLS AND DEMAND NOTES AND ACCOUNTS RECEIVABLE, PREPAID EXPENSES, CASH DIVIDENDS AND INTEREST DECLARED OR ACCRUED AS AFORESAID, AND NOT YET RECEIVED.** Valued at the full value, unless the same is unlikely to be paid or received in full, in which case the Board shall apply such discount as it may consider appropriate to reflect the true value thereof;
- **SHARES OR UNITS OF MONEY MARKET FUNDS.** Valued at their last available NAV as reported by such money market funds;
- **LIQUID ASSETS AND MONEY MARKET INSTRUMENTS.** valued at Mark-to-Market or Mark-to-Model where the use of mark-to-market is not possible, or the market data is not of sufficient quality; and
- **ANY ASSETS OR LIABILITIES IN CURRENCIES OTHER THAN THE FUND CURRENCY** will be converted using the relevant spot rate quoted by a bank or other recognised financial institution. If such quotations are not available, the rate of exchange will be determined in good faith by or under procedures established by the Board.

If any of the above valuation principles do not reflect the valuation method commonly used in specific markets or if any the valuation principles do not appear to accurately reflect the value of the SICAV's assets or if extraordinary circumstances render a valuation in accordance with the above guidelines impracticable or inadequate, the Board or its delegate may adopt different valuation principles in good faith and in accordance with generally accepted valuation principles and procedures to achieve what it believes to be a fair valuation in the circumstances. For complete information on how assets are valued, see the articles.

## Swing pricing

In order to protect shareholders, the Board and the Management Company have adopted a swing pricing policy that allows price adjustments as part of the regular daily valuation process where trading in a fund's shares requires significant purchases or sales of securities.

If on any dealing day the net transactions in shares of a fund exceed a threshold set by the Board from time to time for the fund, the NAV may be adjusted upwards or downwards as applicable to reflect the costs (the "Costs") that may be incurred in liquidating or purchasing investments to satisfy net daily transactions at fund level. These Costs may include but are not limited to estimated

spreads, brokerage fees, transaction tax, commission, and transaction costs. The threshold is set by the Board or the Management Company taking into account factors such as the prevailing market conditions, the estimated dilution costs and the size of the funds and will be triggered mechanically and on a consistent basis. The adjustment will be upwards when the net aggregate transactions result in net subscriptions flows. The adjustment will be downwards when the net aggregate transactions result in net redemption flows. The adjusted asset value will be applicable to all transactions on that day.

The price adjustment, based on both normal net dealings and market volatility, will not exceed 2% of the original Net Asset Value. The actual level of adjustment will be set periodically by a dedicated committee, to which the Board has delegated specific powers. However, whilst the price adjustment is normally not expected to exceed 2%, the Board and/or the Management Company may decide to increase this adjustment limit in exceptional circumstances (such as high net dealings or high market volatility) to protect shareholders' interests. As any such price adjustment will be dependent on aggregate net transactions in Shares, it is not possible to accurately predict whether it will occur at any future point in time and consequently how frequently it will need to be made. Shareholders will be notified of such a decision to increase this adjustment limit via notice on [fidelityinternational.com](https://www.fidelityinternational.com).

## Taxes

The following is summary information and is provided for general reference only. Investors should consult their own tax advisors.

### Taxes paid from fund assets

The SICAV is subject to the Luxembourg tax d'abonnement (subscription tax) at the following rates:

- All share exchange-listed classes of tracking funds): zero.
- All share classes of money market funds (MMFs): 0.01%.
- All other funds, class I: 0.01%.
- All other classes of all other funds: 0.05%.

This tax is calculated and payable quarterly, on the aggregate net asset value of the outstanding shares of the SICAV at the end of each fiscal quarter. Any assets coming from another Luxembourg UCI on which the tax d'abonnement has already been paid are not subject to further tax d'abonnement.

The SICAV is not currently subject to any Luxembourg stamp, withholding, municipal business, net worth or estate tax, or taxes on income, profits or capital gains.

To the extent that any country in which a fund invests imposes withholding taxes on income or gains earned in that country, taxes will be paid by the fund in accordance with the relevant laws. Some of these taxes may be recoverable. The fund might also have to pay other taxes on its investments. The effects of taxes will be factored into fund performance calculations. See also "Tax risk" in the "Risk descriptions" section.

While the above tax information is accurate to the best of the Board's knowledge, it is possible that a tax authority may modify existing taxes or impose new ones (including retroactive taxes) or that the Luxembourg tax authorities may determine, for example, that any class currently identified as being subject to the 0.01% tax d'abonnement should be reclassified as being subject to the 0.05% rate. The latter case could happen for an institutional share class of any fund for any period during which an investor not entitled to hold institutional shares was found to have held such shares.

### Taxes you are responsible for paying

**TAXES IN YOUR COUNTRY OF TAX RESIDENCE** Luxembourg tax residents are generally subject to Luxembourg taxes, such as those mentioned above that do not apply to the SICAV.

Shareholders in other jurisdictions are generally not subject to Luxembourg taxes (with some exceptions, such as the gift tax on Luxembourg-notarised gift deeds). However, an investment in a fund may have tax implication in these jurisdictions.

## TAX INFORMATION DISCLOSURES

**INTERNATIONAL TAX AGREEMENTS** Several international tax agreements require the SICAV to report certain information about fund shareholders to the Administration des Contributions Directes in Luxembourg tax authorities every year, and for those authorities to automatically forward that information to other countries, as follows:

- **DIRECTIVE ON ADMINISTRATIVE COOPERATION II (DAC II) AND COMMON REPORTING STANDARD (CRS)** Collected: direct shareholder information such as name, address, date of birth, tax residency, tax identification number and status under the rules. Information collected, along with investment value and payments made to them annually reported, when required, along with, to the Administration des Contributions Directes in Luxembourg who pass this on to relevant tax authorities globally.
- **US FOREIGN ACCOUNT TAX COMPLIANCE ACT (FATCA)** Collected: direct shareholder information as to whether they are a US Person, and where they are a US Person their name, address and US Tax Identification number. US Person information collected along with investment value and payments made to them reported, when required, to the Administration des Contributions Directes in Luxembourg who pass this on to the Internal Revenue Service in the US annually.

Future agreements, or expansions of existing ones, could increase the countries to which shareholder information is communicated. Any shareholder who fails to comply with the SICAV's information or documentation requests may be subject to penalties from their jurisdiction of residence and may be held liable for any penalties imposed on the SICAV that are attributable to the shareholder's failure to provide the documentation.

## Measures to Prevent Improper and Illegal Behaviour

### Money laundering, terrorism and fraud

To comply with Luxembourg laws, regulations, circulars, aimed at money laundering and terrorism, investors must provide any information and documentation including information about beneficial ownership, source of funds and origins of wealth to demonstrate identity before opening an account

- **natural persons** an identity card or passport copy duly certified by a public authority (such as a notary, police official or ambassador) in his or her country of residence
- **corporations and other entities investing on their own behalf** a certified copy of the entity's incorporation documents or other official statutory document, plus, for the entity's owners or other economic beneficiaries, the identification described above for natural persons
- **financial intermediaries** a certified copy of the entity's incorporation documents or other official statutory document, plus certification that the account owner has obtained necessary documentation for all end investors

We may ask for additional or updated documents at any time if we feel it is necessary, and we may delay or deny the opening or operation of your account and any associated transaction requests (including switches and redemptions) until we receive, and judge to be satisfactory, all requested documents. We may also make comparable requirements to financial intermediaries. We will not be liable for any resulting costs, losses, or lost interest or investment opportunities.



If you have any questions regarding our identification documentation required, contact us (see p. 2).

Fidelity is committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime related laws, regulations, and standards in all of the jurisdictions in which it operates, including the sanctions regimes issued by the European Union and the United Nations ("Sanctions regimes") which apply directly to the SICAV as a result of its domicile within the European Union. This may result in the SICAV not accepting certain new investors or subscriptions of existing investors if this would lead to breaches to the sanctions regimes. Where required by regulation, the SICAV will enact a freeze of holdings to individuals or entities designated in applicable sanctions lists.

All investors are expected to act in accordance with these sanctions regimes

## Market timing and excessive trading

The SICAV is designed and managed to support longer-term investment and active trading is discouraged. Short-term or excessive trading into and out of the SICAV may harm performance by disrupting portfolio management strategies and by increasing expenses. In accordance with general FIL Group policy and practice and CSSF circular 04/146, the SICAV and the Distributors are committed not to permit transactions which they know to be or have reasons to believe to be related to market timing. Accordingly, the SICAV and the Distributors may refuse to accept applications for or switching of Shares, especially where transactions are deemed disruptive, particularly from market timers or investors who, in the SICAV's or any of the Distributors' opinion, have a pattern of short-term or excessive trading or whose trading has been or may be disruptive to the SICAV. For these purposes, the SICAV and the Distributors may consider an investor's trading history in a fund or other FIL Group UCIs and accounts under common ownership or control

## Late trading

We take measures to ensure that any request to buy, switch or sell shares that arrives after the cut-off time for a given NAV will not be processed at that NAV.

## Privacy of Personal Information

In accordance with the Data Protection Law, the SICAV and the Management Company, acting as joint data controllers, hereby informs you (and in case of a legal person, informs the investor's contact person and/or beneficial owner) that certain personal data ("Personal Data") provided to the SICAV or its delegates may be collected, recorded, stored, adapted, transferred or otherwise processed for the purposes set out below. Personal Data includes (i) the name, address (postal and/or e-mail), bank details, invested amount and holdings of a shareholder; (ii) for corporate shareholders: the name and address (postal and/or e-mail) of the shareholders' contact persons, signatories, and the beneficial owners; and (iii) any other personal data the processing of which is required in order to comply with regulatory requirements, including tax law and foreign laws. Personal Data supplied by you is processed in order to enter into and execute transactions in Shares of the SICAV and for the legitimate interests of the SICAV. In particular, legitimate interests include (a) complying with the SICAV's accountability, regulatory and legal obligations; as well as in respect of the provision of evidence of a transaction or any commercial communication; (b) exercising the business of the SICAV in accordance with reasonable market standards and (c) the processing of Personal Data for the purpose of: (i) maintaining the register of shareholders; (ii) processing transactions in Shares and the payment of dividends; (iii) maintaining controls in respect of late trading and market timing practices; (iv) complying with applicable anti-money laundering rules; (v) marketing and client-

related services; (vi) fee administration; and (vii) tax identification under the EU Savings Directive, OECD Common Reporting Standard (the "CRS") and FATCA.

The Fund may, subject to applicable law and regulation, delegate the processing of Personal Data, to other data recipients such as, inter alia, the Management Company, the Investment Managers, the sub-investment managers, the Administrator, the Registrar and Transfer Agent, the Depositary and Paying Agent, the auditor and the legal advisors of the SICAV and their service providers and delegates (the "Recipients"). The investor is informed and acknowledges that the Personal Data will be processed in accordance with the privacy statement (the "Privacy Statement") available at [www.fidelityinternational.com](http://www.fidelityinternational.com). The Recipients may, under their own responsibility, disclose Personal Data to their agents and/or delegates for the sole purposes of assisting the Recipients to provide services to the SICAV and/or to fulfil their own legal obligations. Recipients or their agents or delegates may, process Personal Data as data processors (when processing upon instruction of the SICAV), or as data controllers (when processing for their own purposes or to fulfil their own legal obligations). Personal Data may also be transferred to third parties such as governmental or regulatory agencies, including tax authorities, in accordance with applicable law and regulation. In particular, Personal Data may be disclosed to the Luxembourg tax authorities, which in turn may, acting as data controller, disclose the same to foreign tax authorities. In accordance with the conditions laid down by the Data Protection Law, you have the right to:

- request access to the Personal Data
- request the correction of the Personal Data where it is inaccurate or incomplete
- object to the processing of the Personal Data
- request erasure of the Personal Data
- request for restriction of the use of the Personal Data and
- request for Personal Data portability)

You may exercise the above rights by writing to the SICAV or the Management Company (see page 4).

You also have the right to lodge a complaint with the National Commission for Data Protection (the "CNPD") at the following address: 15 boulevard du Jazz, L-4370 Belvaux, Grand Duchy of Luxembourg, or with any competent data protection supervisory authority.

You may, at your discretion, refuse to communicate your Personal Data to the SICAV. In this event, however, the SICAV may reject the request for subscription for Shares and block an account for further transactions. Personal Data shall not be retained for periods longer than those required for the purpose of its processing subject to any limitation periods imposed by applicable law.

## Rights We Reserve

Within the limits of the law and the articles of incorporation, we reserve the right to do any of the following at any time so long as it is consistent with the best interests of shareholders:

- **REJECT OR CANCEL ANY APPLICATION TO OPEN AN ACCOUNT OR ANY REQUEST TO SUBSCRIBE FOR SHARES, FOR ANY REASON.** Whether for an initial or additional investment we can reject the entire amount or part of it
- **DECLARE ADDITIONAL DIVIDENDS** or change (temporarily or permanently) the method used for calculating dividends.
- **TAKE APPROPRIATE MEASURES TO PREVENT OR REMEDY IMPROPER OWNERSHIP OF SHARES.** This includes ownership by any investor ineligible to own them or whose ownership might be detrimental to the SICAV or its shareholders. The following examples apply to both existing and prospective shareholders and to both direct and beneficial ownership of shares:
  - requiring investors to provide any information we consider necessary for determining the identity and eligibility of a shareholder

- forcibly selling (and returning the proceeds in the share class currency) or exchanging, free of any redemption fee, any shares we believe are being held in whole or in part by or for an investor who is, or appears likely to become, ineligible to own those shares, or who has failed to provide any requested information or declaration within one month of being requested to do so, or whose ownership the SICAV has determined might be detrimental to its interests or those of shareholders
- preventing investors from acquiring shares if we believe it is in the interests of existing shareholders to do so

We may take any of these measures to ensure the SICAV's compliance with law and regulation; to avoid the adverse regulatory, tax, administrative, or financial consequences for the SICAV (such as tax charges); to remedy the ownership of shares by a US person or any other investor whose ownership of shares is not permitted by the investor's jurisdiction; or for any other reason, including the avoidance of any local registration or filing requirements with which the Management Company or the SICAV would not otherwise be required to comply. The SICAV will not be liable for any gain or loss associated with the above actions.

• **TEMPORARILY SUSPEND THE CALCULATION OF NAVS OR TRANSACTIONS IN A FUND'S SHARES** when any of the following is true:

- the principal stock exchanges or markets associated with a substantial portion of the fund's investments are closed during a time when they normally would be open, or their trading is restricted or suspended, and we believe these conditions have a material effect on the value of assets the fund holds
- a disruption of communication systems normally employed in determining the price of any of the SICAV's investments has made it impractical to value fund assets in a timely and reliable way
- a state of emergency exists (not created or controllable by the management company) that makes it impracticable to value or liquidate assets
- any other reason exists to make the fund unable to promptly and accurately obtain prices for any investments to which it is exposed
- the fund is unable to repatriate monies needed to pay out redemption proceeds, or is unable to liquidate assets or exchange monies needed for operations or redemptions at what the Board considers to be a normal price or exchange rate
- circumstances exist under which we believe it would be impractical or unfair to shareholders to continue dealing in fund shares, or would carry undue risk to do so
- the NAV of one or more investment funds in which the fund invests a substantial part of its assets is suspended
- the fund or SICAV is being liquidated or merged

A suspension could apply to any share class and fund, or to all, and to any type of request (buy, switch, sell).

In addition to suspensions at the fund or SICAV level, any distributor of the fund may declare its own suspension of processing of fund shares under similar terms as above.

Any suspension shall be published in such manner as decided by the Board if the Board consider the suspension is likely to exceed one week.

Shareholders who have requested switching or redemption of their Shares or who have made an application to subscribe for Shares will be notified of any such suspension and will be promptly notified upon termination of such suspension.

• **IMPLEMENT SPECIAL PROCEDURES DURING TIMES OF PEAK BUY, SWITCH OR SELL REQUESTS.** If on any Valuation Day redemption requests and switching requests relate to more than 10% of the Shares in issue in respect of a fund, the Directors

may declare that part or all of such Shares for redemption or switching will be deferred on a pro rata basis for a period that the Directors consider to be in the best interests of the SICAV and/or the Directors may defer any switching or redemption request which exceeds the higher of 3% of the Shares in issue in respect of a fund or USD 5 million (or its currency equivalent).. Such period would not normally exceed 20 Valuation Dates. On such Dates, these redemption and switching requests will be met in priority to later requests.

• **CLOSE A FUND OR SHARE CLASS TO FURTHER INVESTMENT,** temporarily or indefinitely, without notice, when the Management Company believes it is in the best interests of shareholders (such as when a fund has reached the size where further growth appears likely to be detrimental to performance).

A closure may apply only to new investors or to further investments from existing shareholders as well.

• **PARTIAL CLOSURE** The Board and/or the Management Company may decide to partially close a fund or class of Shares to all buys, subscription or switches in from new investors only, or to totally close a fund or class of Shares to all buys or subscription or switches in (but not, in either of the case of partial or total closure as described, to redemptions or switches out).

Where this occurs, the website [www.fidelityinternational.com](http://www.fidelityinternational.com) will be amended to indicate the change in status of the applicable fund or class of Shares. Shareholders and potential investors should confirm with the Management Company or the Distributors or check the website for the current status of funds or class of Shares. Once closed, a fund or a class of Shares will not be re-opened until, in the opinion of the Board, the circumstances which required closure no longer prevail.

• **ACCEPT SECURITIES AS PAYMENT FOR SHARES, OR FULFILL REDEMPTION PAYMENTS WITH SECURITIES (IN-KIND PAYMENTS).** If you wish to request a subscription or redemption in kind, you must get advance approval from the Management Company. These securities will be valued as described in article 232 of the articles, as of the transaction Valuation Day.

Any securities accepted as a payment in kind for a subscription of shares must be consistent with the fund's investment policy, and acceptance of these securities must not affect the fund's compliance with the 2010 law. Securities provided in redemptions in kind will be determined on a fair and reasonable basis, without prejudice in favour of the recipient or the remaining shareholders.

With all in-kind transactions, the shareholder generally must pay the cost of an independent valuation report from the SICAV's auditor and other documentation, and must pay any entry, exit, or other fees in cash.

If you receive approval for an in-kind redemption, we will seek to provide you with a selection of securities that closely or fully matches the overall composition of the fund's holdings at the time the transaction is processed.

• **REDUCE OR WAIVE ANY STATED SALES CHARGE, OR MINIMUM INVESTMENT AMOUNT, FOR ANY FUND, INVESTOR, OR REQUEST,** especially for investors who are committing to invest a certain amount over time, so long as it is consistent with equal treatment of shareholders. We may also allow distributors to set different minimum investment requirements.

• **RAISE THE ENTRY FEES.** Under the terms of the articles, the initial sales charge (entry fee) may be increased to a maximum of 8% of NAV.

## Notices, Publications and Other Information

The following table shows which material (in its most recent version) is made available through which channels items in the first 6 rows are typically available through financial advisors.

Information/document	Sent	Media	Online	Office
KIDs, prospectus, financial reports			•	•
Shareholder notices	•		•	•
The suspension of NAV calculation expected to last more than a week		•	•	•
The daily NAV of each non-money market fund			•	•
For each money market fund, the daily NAV, calculated to four decimal points, along with weekly data on the net yield, maturity breakdown, credit profile, weighted average maturity (WAM), weighted average life (WAL), 10 largest holdings, and its assets			•	•
Any swing price adjustment of above 2% of the NAV			•	
Dividend announcements			•	•
Statements/confirmations	•			
Core agreements (the articles; agreements with the management company, investment managers, depositary, administrator, local agents and representatives, and other major service providers)				•
Policies and procedures for complaint handling, voting of portfolio shares, research fees best execution, inducements (financial and non-financial) available to the management company, list of current distribution agents/nominees, and a description of the depositary's current duties and related conflicts of interest				•
Core policies (conflicts of interest, best execution, remuneration, voting, complaints handling, benchmarks, etc.) as well as a current list of sub-custodians			•	•

### KEY

**Sent** General materials: sent to all shareholders directly registered in the SICAV's shareholder list at the address of record (physically, electronically, or as an emailed link). Investor-specific materials, such as account statements, trade confirmations, and suspensions of requests to exchange or sell an investor's shares: sent to the relevant shareholder(s). Any communications to shareholders will be published on the respective local/country websites and/or may be notified via e-mail, (in the latter case only) where a shareholder has consented and provided an e-mail address to the Management Company for such purposes.

**Media** Published, as required by law or as determined by the Board, in newspapers or other media, or electronic platforms, such as Bloomberg, as well as the Recueil Electronique des Sociétés et Associations.

**Online** Posted online on [fidelityinternational.com](https://www.fidelityinternational.com).

**Office** Available free upon request from the registered offices of the management company, and available for inspection at those offices; the KIDs, prospectus, financial reports are available on the same basis from the depositary and local distributors. The core agreements are available on the same basis from the depositary.

Shareholder notices include annual shareholder meetings and notices of prospectus changes, the mergers or closings of funds or share classes (along with the rationale for the decision), and all other items for which notice is required.

Audited annual reports are issued within four months of the end of the financial year. Unaudited semi-annual reports are issued within two months of the end of the period they cover. Information on past performance, by fund and share class, appears in the applicable KID and on [fidelityinternational.com](https://www.fidelityinternational.com).

# Management and Governance

## The SICAV

<b>Name and registered office</b>
Fidelity Active SStrategy 2a Rue Albert Borschette, BP 2174 L-1246 Luxembourg
<b>Website</b> <a href="https://www.fidelityinternational.com">fidelityinternational.com</a>
<b>Legal structure</b> Open-ended investment scheme organised as a société d'investissement à capital variable (SICAV)
<b>Legal jurisdiction</b> Luxembourg
<b>Incorporated</b> 14 September 2004
<b>Duration</b> Indefinite
<b>Articles of incorporation</b> First published in the Mémorial, Recueil Spécial des Sociétés et Associations on 27 September 2004; latest amendments published in the Mémorial on 28 December 2012.
<b>Regulatory authority</b>
Commission de Surveillance du Secteur Financier 283, route d'Arlon, L-1150 Luxembourg
<b>Registration number (Luxembourg Trade and Companies Register)</b> B 102944
<b>Financial year</b> 1 October to 30 September
<b>Capital</b> Sum of the net assets of all of the funds
<b>Minimum capital</b> EUR 1,250,000 or equivalent in any other currency
<b>Par value of shares</b> None

### Structure and Governing Law

The SICAV qualifies as an UCITS under Part 1 of the 2010 Law, and is registered as such with the CSSF. Registration with the CSSF does not constitute an endorsement or any statement about the adequacy or accuracy of a prospectus. The SICAV functions as an “umbrella fund” under which the funds are created and operate. The assets and liabilities of each fund are segregated from those of other funds; there is no cross-liability, and a creditor of one fund has no recourse to the assets of any other fund.

Disputes arising among the shareholders, the Management Company and the depositary will be settled according to Luxembourg law and subject to the jurisdiction of the District Court of Luxembourg. However, with disputes involving investors who are residents of other countries, or transactions in shares occurring in other countries, the Management Company or the depositary may choose to submit themselves, and the SICAV, to the jurisdiction of courts or laws of those countries. To lodge a complaint, contact the Compliance Department of the Management Company (see contact information on page 3).

The ability for a shareholder to bring a claim against the SICAV expires 5 years after the event on which the claim would be based.

### The Board

#### Jeffrey Lagarce (chair)

USA

#### Romain Boscher

France

#### Eliza Dungworth

Luxembourg

#### Carine Feipel (independent director)

Luxembourg

#### FIL (Luxembourg) S.A.

Represented by Nishith Gandhi

The Board is responsible for the overall investment policy, objectives, and management of the SICAV and funds and, as described more fully in the articles, has broad powers to act on behalf of the SICAV and the funds, including:

- appointing and supervising the management company
- setting investment policy and approving the appointment of any investment manager, sub-investment manager, or investment adviser
- making all determinations regarding the launch, modification, merger, split, termination, or discontinuation of funds and share classes, including such matters as timing, pricing, fees, distribution policy and payment of dividends, liquidation of the SICAV, and other conditions
- determining eligibility requirements and ownership restrictions for investors in any fund or share class, and what steps may be taken in the case of any violation
- determining the availability of any share class to any investor or distributor or in any jurisdiction
- determining when and how the SICAV will exercise its rights and will distribute or publicise shareholder communications
- ensuring that the appointments of the Management Company and the depositary are consistent with the 2010 Law and any applicable contracts of the SICAV
- determining whether to list any shares on the Luxembourg Stock Exchange or any other stock exchanges

The Board has delegated the day-to-day management of the SICAV and its funds to the Management Company, which in turn has delegated some or all of its duties to various Investment Managers and other service providers, subject to its overall control and supervision.

The Board is responsible for the information in this prospectus and has taken all reasonable care to ensure that it is materially accurate, complete, and not misleading. The prospectus will be updated as required when funds are added or discontinued or when other material changes are made.

Directors serve until their term ends, they resign, or they are revoked, in accordance with the articles. Any additional directors will be appointed in accordance with the articles and Luxembourg law. Independent directors (directors who are not employees of any FIL Group entity) are entitled to receive compensation for

serving on the Board and reimbursement of expenses related to their service as directors.

The Directors shall be indemnified by the SICAV against liability and related expenses in connection with any claim brought against such person by reason of their having been such Director or officer, provided that no indemnity shall be provided against liability to the SICAV or its shareholders by reason of willful misfeasance, bad faith, negligence or reckless disregard of duties or with respect to any matter as to which they shall have been finally adjudicated not to have acted in good faith in the reasonable belief that their action was in the best interests of the SICAV.

### Professional Firms Engaged by the SICAV

The Management Company and various professional firms are engaged by the SICAV through service agreements that extend for an indefinite period. The SICAV may terminate any of these service agreements immediately if it determines it is in the shareholders' interest. Otherwise, a holder of any of these service agreements can resign or be replaced by the SICAV (upon 90 days' notice in case of the depositary). Regardless of the circumstances of termination, any professional firm must cooperate fully with a transition of its duties, consistent with its service agreement, its duties under law, and the instructions of the Board.

### Management company

See "The Management Company" on page 57.

### Administrator

#### FIL Investment Management (Luxembourg) S.A.

2a Rue Albert Borschette, BP 2174  
L-1246 Luxembourg

See "The Management Company" on page 57.

### Depositary

#### Brown Brothers Harriman (Luxembourg) S.C.A.

80 Route d'Esch  
L-1470 Luxembourg

The depositary provides such services as:

- safekeeping the assets of the SICAV (custody of assets that can be held in custody and ownership verification and record keeping of other assets)
- fulfilling oversight duties to ensure that the activities defined in the depositary agreement are carried out in accordance with the Board's instructions and, above all, with the 2010 Law and the articles; these activities include the calculation of NAV, the issuing of fund shares, and the timely receipt and allocation of income and revenues to each fund and share class, among others
- cash flow monitoring

The depositary must use reasonable care in exercising its functions and is liable to the SICAV and shareholders for any losses that result from failing to properly perform its duties, as defined in the depositary agreement.

It may entrust some or all of SICAV's assets to third party financial institutions (such as banks or clearinghouses), but this will not affect its liability. The fees of any third-party delegate appointed by the Depositary shall be paid by the SICAV.

Up-to-date information on sub-custodians is available at [bbh.com/luxglobalcustodynetworklist](http://bbh.com/luxglobalcustodynetworklist).

Where the law of a third country requires that certain investments be held in custody by a local entity, but no local entities satisfy the delegation requirement, the depositary may nevertheless delegate to a local entity so long as the SICAV has informed investors and has given the depositary appropriate instructions.

The depositary is not allowed to carry out activities with regard to the SICAV that may create conflicts of interest between the SICAV, the shareholders, and the depositary itself (including its service providers), unless it has properly identified any such potential conflicts of interest, has functionally and hierarchically separated the performance of its depositary tasks from its other potentially conflicting tasks, and the potential conflicts of interest are properly identified, managed, monitored, and disclosed to the SICAV and its shareholders. The depositary's current conflicts of interest policy is available free of charge upon request to the depositary.

### Lending agents

#### Brown Brothers Harriman & Co.

Boston, Massachusetts

The lending agents carry out **Securities lending** transactions and the management of associated collateral.

### Auditor

#### Deloitte Audit S.à r.l.

20, Boulevard de Kockelscheuer  
L-1821 Luxembourg

The auditor provides independent review of the financial statements of the SICAV and all funds once a year. The auditor also verifies all performance fee calculations. The appointment is subject to shareholder's approval at each annual general meeting.

### Shareholder Meetings and Voting

The annual general meeting is generally held in Luxembourg at 12:00 Noon CET on the second Thursday in March each year, or if that is not a banking day in Luxembourg, then the next day that is. To the extent provided by Luxembourg law, the Board may choose to hold the annual general meeting at a different time, day, or place. Other shareholder meetings may be held at other places and times. All meetings are subject to appropriate approval and notification.

Written notice convening annual general meetings will be provided to shareholders as required by Luxembourg law and the articles.

Resolutions concerning the interests of all shareholders generally will be taken in a general meeting. The shareholders of a fund may hold a general meeting to decide on any matter that relates exclusively to that fund.

The right of a shareholder to attend a general meeting of shareholders and to exercise the voting rights attaching to their shares shall be determined by reference to shares held by this shareholder as at the Record Date. For information on admission and voting at any meeting, refer to the applicable convening notice.

### Liquidation or Merger

Any decision of the Board to terminate, merge, split, or liquidate a share class, a fund, or the SICAV will be communicated to shareholders in accordance with Luxembourg law; see the section "Notices, Publications and Other Information".



Liquidation of the SICAV, a fund or share class

The Board may decide to liquidate or divide into two or more funds or classes any share class or fund in the event that:

- the assets of the class or fund have fallen below USD 50 million
- the Board believes that it is justified either by a change in the economic or political situation relating to the fund or the class or that the interests of shareholders would justify it

The liquidation decision will be published or notified to the shareholders of the relevant fund prior to the effective date of the liquidation and the publication or notification will indicate the reasons and the procedures for the liquidation. Unless the Board otherwise decides in the interests of, or to keep equal treatment between, the shareholders, the shareholders of the fund or the class of shares concerned may continue to request redemption or conversion of their shares.

In all other circumstances or where the Board determines that the decision should be put to shareholders for approval, the decision to liquidate a fund or a class of Shares may be taken at a meeting of shareholders of the fund or class of Shares to be liquidated. At such meeting, no quorum shall be required and the decision to liquidate will be taken by simple majority of the votes cast. The decision of the meeting will be notified and/or published by the SICAV in accordance with applicable laws and regulations.

The Board may also, under the circumstances provided in the first paragraph above, decide upon the reorganisation of any fund by means of a division into two or more separate funds or to consolidate or split any Share classes within a fund. To the extent required by Luxembourg law, such decision will be published or notified, if appropriate, in the same manner as described in the first paragraph of this section. The Board may also decide to submit the question of the consolidation or split of classes of Shares to a meeting of shareholders of such classes. No quorum is required for this meeting and decisions are taken by the simple majority of the votes cast.

The SICAV is established for unlimited duration but may be liquidated at any time by resolution of shareholders in accordance with Luxembourg law. A general meeting of the shareholders will be called to consider the liquidation of the SICAV if the value of the SICAV's net assets should decline to less than two-thirds of the minimum capital required by law. The minimum capital required by Luxembourg law is currently the equivalent of Euro 1,250,000. In the event of any contemplated liquidation of the SICAV, no further issues, switchings, or redemptions of Shares will be permitted after publication of the first notice convening the general meeting of Shareholders for the purpose of winding up the SICAV. All Shares outstanding at the time of such publication will participate in the SICAV's liquidation distribution.

Amounts from liquidation of the SICAV or a fund that cannot be distributed to the shareholders within a period of nine months will be deposited in escrow with the Caisse de Consignation until the statutory period of limitation has elapsed. Amounts unclaimed within 30 years may be forfeited.

If, after the closure or liquidation of a fund, unexpected payments which relate to that specific fund are received by the SICAV and the Board considers that, in consideration of the amounts concerned or the time elapsed since the close of the liquidation, it is not appropriate or operationally justified to revert to former shareholders, these amounts will be retained by the SICAV.

Mergers

Any merger of a fund shall be decided upon by the Board unless the Board decides to submit the decision for a merger to a meeting of shareholders of the fund concerned. No quorum is required for such meeting and decisions are taken by the simple majority of the votes cast. In case of a merger of one or more funds where, as a result, the SICAV ceases to exist, the merger

shall be decided by a meeting of shareholders for which no quorum is required and that may decide with a simple majority of the votes cast. In addition, the provisions on mergers of UCITS set forth in the Law of 2010 and any implementing regulations (relating in particular to the notification to shareholders) shall apply.

The Management Company

**Company name and registered address**  
FIL Investment Management (Luxembourg) S.A.  
2a Rue Albert Borschette, BP 2174  
L-1246 Luxembourg  
**Website** [fidelityinternational.com](https://www.fidelityinternational.com)  
**Legal structure** Société anonyme  
**Legal jurisdiction** Luxembourg  
**Incorporated** 14 August 2002  
**Regulatory authority**  
Commission de Surveillance du Secteur Financier  
283, route d'Arlon, L-1150 Luxembourg  
**Registration number (Luxembourg Trade and Companies Register)** B 88 635  
**Other funds managed** See [fidelityinternational.com](https://www.fidelityinternational.com)

Directors of the Management Company

Christopher Brealey

Luxembourg

Eliza Dungworth

Luxembourg

Jon Skillman

Luxembourg

Sera Sadrettin-Perry

United Kingdom

Romain Boscher

France

Conducting Officers

Florence Alexandre

Luxembourg

Stephan von Bismarck

United Kingdom

Corinne Lamesch

Luxembourg

Karin Winklbauer

Luxembourg

Paul Witham

Luxembourg



## Responsibilities and delegation

The Board of the SICAV has appointed the Management Company to perform investment management, administrative and marketing functions. With the approval of the Board and the CSSF, the Management Company has the option of delegating to qualified third parties some or all of the portfolio management, administration, and marketing functions, so long as it retains supervision, implements appropriate controls and procedures, and maintains the prospectus.

An Investment Manager may in turn appoint one or more investment sub-managers.

The Management Company must require any delegated entity to comply with the prospectus, articles, 2010 Law and other applicable provisions when acting on behalf of the SICAV. The Management Company must report to the Board quarterly, and the conducting officers must promptly inform the directors of the Management Company and the Board of any materially adverse administrative matters resulting from the actions of the Investment Manager, the general distributor and the Management Company itself.

The Investment Managers, investment sub-managers, and all service providers and delegates engaged by the Management Company have agreements to serve for an indefinite period.

The Board or the Management Company may terminate any of these service agreements immediately if it determines it is in the best interests of shareholders. Otherwise, a holder of any of these service agreements can resign or be replaced upon 90 days' notice (under certain circumstances, 30 days for investment management agreements concerning shares authorised for sale in Hong Kong).

## Management Company Policies

More information about these and other corporate conduct policies is available either at the links indicated below or as indicated in "Notices, Publications and Other Information" at the end of "Investing in the Funds".

## Conflicts of interest

FIL Group is a worldwide full-service provider of investment banking, asset management, and financial services and a major participant in the global financial markets. As such, FIL Group is active in various business activities and may have other direct or indirect interests in the financial markets in which the SICAV invests. The SICAV is not entitled to compensation related to such business activities.

The Management Company, Investment Manager, General Distributor and certain other distributors and service providers or delegates are part of FIL Group. A FIL Group entity could be an issuer or counterparty for a security or derivative a fund is considering buying or selling. In addition, a FIL Group entity that serves the SICAV in a given capacity could serve another SICAV (whether promoted by FIL Group or not) in a similar or different capacity.

In such cases, the Management Company seeks to identify, manage, and, where necessary, prohibit any action or transaction that could pose a conflict between the interests of the FIL Group entities and the SICAV or its investors, for example the SICAV and other clients of FIL Group entities. Where transactions are conducted that might have the potential to be affected by a conflict of interest, such transactions must be conducted on normal commercial terms at arm's length. Any incidents in which conflicts of interest may not have been adequately neutralised, as well as the decisions taken to address such incidents, will be reported to investors in the notes to the SICAV's financial statements.

The management company, along with all other FIL Group entities, strives to manage any conflicts in a manner consistent with the highest standards of integrity and fair dealing. The Management Company conflict of interest policy is available at [fidelityinternational.com](https://www.fidelityinternational.com).

## Remuneration

The Management Company has implemented a remuneration policy that is designed not to encourage risk-taking inconsistent with the risk profile of the funds while not hindering the Management Company in its duty to act in the best interest of shareholders.

The remuneration policy:

- supports a performance culture that is based on merit
- differentiates and rewards excellent performance, both in the short and long term
- balances fixed and variable compensation to appropriately reflect the value and responsibility of the role performed day to day, and to influence appropriate behaviours and actions
- requires that compensation decisions for employees in independent control functions be determined by a control division's senior management, so that these decisions will be wholly independent of the business areas
- is consistent with, and promotes, effective risk management practices, including sustainability risks
- is consistent with the management company's conflict of interest policy and more broadly with its compliance and control culture

The directors of the Management Company are responsible for ensuring that the policy is applied to all Management Company staff and for reviewing the policy every year. The current remuneration policy is available at [www.fil.com](https://www.fil.com). A paper copy can be obtained, free of charge, upon request, in English at the office of the Management Company.

## Best execution

Each Investment Manager and sub-investment manager has adopted a best execution policy to implement all reasonable measures to ensure the best possible result for the SICAV, when executing orders. In determining what constitutes best execution, the Investment Manager and/or sub-investment manager will consider a range of different factors, such as price, liquidity, speed, and cost, among others, depending on their relative importance based on the various types of orders or financial instrument. Transactions are principally executed via brokers that are selected and monitored on the basis of the criteria of the best execution policy. Connected persons are also considered. To meet its best execution objective, the Investment Manager and/or sub-investment manager may choose to use agents (Connected Persons or not) for its order transmission and execution activities.

The Investment Manager, any of its delegates and/or any of their Connected Persons may effect transactions by or through the agency of another person with whom the Investment Manager, any of its delegates and/or any of their Connected Persons have an arrangement under which that party will from time to time provide to or procure for the Investment Manager, any of its delegates and/or any of their Connected Persons goods, services or other benefits (such as research and advisory services, where permitted by regulation only) ("soft dollar arrangements"), the nature of which is such that their provision can reasonably be expected to benefit the SICAV as a whole and may contribute to an improvement in the SICAV's performance and that of the Investment Manager or any of its delegates in providing services to the SICAV and for which no direct payment is made but instead the Investment Manager, any of its delegates and/or any of their Connected Persons undertake to place business with that party. For the avoidance of doubt, such goods and services do not

include travel, accommodation, entertainment, general administrative goods or services, general office equipment or premises, membership fees, employee salaries or direct money payments. Periodic disclosure is made in the annual report of the SICAV in the form of a statement describing the soft dollar policies and practices of the Investment Manager or its delegates, including a description of goods and services received by them and/or any of their Connected Persons.

The Investment Manager, any of its delegates and/or any of their Connected Persons shall not retain the benefit of any cash commission rebate (being cash commission repayment made by a broker or dealer to the Investment Manager, any of its delegates and/or any of their Connected Persons) paid or payable from any such broker or dealer in respect of any business placed with such broker or dealer by the Investment Manager, any of its delegates and/or any of their Connected Persons for or on behalf of the SICAV. Any such cash commission rebate received from any such broker or dealer shall be held by the Investment Manager, any of its delegates and/or any of their Connected Persons for the account of the SICAV. Brokerage rates will not be excessive of customary institutional full-service brokerage rates. All transactions will be done with best execution. The availability of soft dollar arrangements may not be the sole or primary purpose to perform or arrange transaction with such broker or dealer.

Further information in respect of fees related to investment research, including the maximum that may be charged to a fund is available at the registered office of the SICAV or at [fidelityinternational.com/researchbudget](https://fidelityinternational.com/researchbudget).

## Professional Firms Engaged by the Management Company

### Investment Manager

#### FIL Fund Management Limited

Pembroke Hall, 42 Crow Lane  
Pembroke HM19, Bermuda

The Investment Manager handles the day-to-day management of each fund in accordance with the stated investment objectives and policies. It is authorized to act on behalf of the SICAV and choose agents, brokers, dealers, and effect securities trades for each fund's portfolio.

The Investment Manager may receive investment advice from, and act upon the advice of, any Connected Person of the Investment Manager or any other third party adviser. Moreover, the Investment Manager may sub-delegate investment management activities to any Connected Person of the Investment Manager or any other eligible entity under applicable regulation. The Investment Manager shall remain responsible for the proper performance by such entity of those responsibilities.

The Investment Manager may sub-delegate Investment management to the following entities (including their branches). The annual and semi-annual reports list all entities having managed assets of each fund over the last six or twelve months.

### Investment sub-managers

#### FIL Investment Management (Singapore) Limited

8 Marina View  
#35-06 Asia Square Tower 1  
Singapore 018960

#### FIL Investments International

Beech Gate, Millfield Lane  
Lower Kingswood, Tadworth  
Surrey, KT20 6RP UK

#### FIL Investment Management (Hong Kong) Limited

Level 21, Two Pacific Place  
88 Queensway, Admiralty  
Hong Kong

#### FIL Gestion

21, avenue Kléber  
75784 Paris Cedex 16, France

#### FIL Investment Management (Australia) Limited

Level 17, 60 Martin Place  
Sydney, NSW 2000, Australia

#### FIL Investments (Japan) Limited

7-7 7, Roppongi, Minato-ku  
Tokyo 106 0032, Japan

#### FIL Asset Management (Korea) Limited

4/F, Seoul Finance Center  
84 Taepyung Ro 1Ga, Chung-Gu  
Seoul, Korea

### General distributor

#### FIL Distributors

Pembroke Hall, 42 Crow Lane Pembroke HM19, Bermuda  
**Phone** +1 441 297 7267  
**Fax** +1 441 295 4493

The General Distributor is responsible for marketing, sales or distribution of shares in the SICAV.

### Other distributors and agents

The General Distributor may engage FIL Group companies as well as third parties as local distributors, dealing facilities or representatives in certain countries or markets. The Management Company may act as a dealing facility itself.

In some countries, use of an agent is mandatory, and the agent may not merely facilitate transactions but may hold shares in its own name on behalf of investors. Distributors can act as nominees, which may affect your rights as an investor.

Entity and area served	Distributor
<b>Australia</b>	
<b>FIL Investment Management (Australia) Limited</b> Level 17, 60 Martin Place Sydney, NSW 2000, Australia <b>Phone</b> (+61) 1800 044 922	●
<b>Bermuda</b>	
<b>FIL Distributors International Limited</b> PO Box HM670 Hamilton HMCX, Bermuda <b>Phone</b> (+1) 441 297 7267 <b>Fax</b> (+1) 441 295 4493	●
<b>France</b>	
<b>FIL Gestion</b> 21, avenue Kléber 75784 Paris Cedex 16, France <b>Phone</b> (+33) 7304 3000	●
<b>Germany</b>	
<b>FIL Investment Services GmbH</b> Kastanienhöhe 1 D61476 Kronberg im Taunus, Germany <b>Phone</b> (+49) 6173 5090 <b>Fax</b> (+49) 6173 5094 199	●
<b>Hong Kong</b>	
<b>FIL Investment Management (Hong Kong) Limited</b> Level 21, Two Pacific Place 88 Queensway Admiralty, Hong Kong <b>Phone</b> (+852) 2629 2629 <b>Fax</b> (+852) 2629 6088	●

Entity and area served	Distributor
<b>Luxembourg</b>	
<b>FIL (Luxembourg) S.A.</b> 2a, Rue Albert Borschette, BP 2174 L-1246 Luxembourg <b>Phone</b> (+352) 2504 0424 00 <b>Fax</b> (+352) 2638 3938	●
<b>Taiwan</b>	
<b>FIL Securities Investment Trust Co. (Taiwan) Limited</b> 11F, 68 Zhongxiao East Road Section 5, Xinyi District Taipei City 11065, Taiwan	
<b>FIL Investment Management (Singapore) Limited</b> 8 Marina View #27-01-06, Asia Square Tower 1 Singapore 018960 <b>Phone:</b> (65) 6511 2200 <b>Fax:</b> (65) 6536 1960	●
<b>Other jurisdictions</b>	
<b>FIL Pensions Management</b> Beech Gate, Millfield Lane, Lower Kingswood, Surrey, KT20 6RP United Kingdom <b>Phone</b> (44) 1732 777377 <b>Fax</b> (44) 1732 777262	●

## Sustainability Annexes

### Contents

FAST - Emerging Markets Fund.....	2
FAST - Europe Fund.....	10
FAST - Global Multi Asset Selection 80 Fund.....	18
FAST - Global Multi Asset Thematic 60 Fund.....	26

**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:**

FAST - Emerging Markets Fund

**Legal entity identifier:**

549300BLVB8H8C5DUV35

**Environmental and/or social characteristics**

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

☒ ☒ ☐ **Yes**

☐ 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 will make a minimum of **sustainable investments with a social objective:** \_\_\_\_%

☒ ☐ ☒ **No**

☒ 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 10% 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 promotes E/S characteristics, **but will not make any sustainable investments**



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

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

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. ESG ratings consider environmental characteristics including carbon intensity, carbon emissions, energy efficiency, water and waste management and biodiversity, as well as social characteristics including product safety, supply chain, health and safety and human rights.

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) in respect of its direct investments in corporate issuers, the percentage of the fund invested in securities of issuers with exposure to the Exclusions (defined below);
- iii) the percentage of the fund invested in sustainable investments;
- iv) the percentage of the fund invested in sustainable investments with an environmental objective in economic activities (that do not qualify as environmentally sustainable under the EU Taxonomy); and
- v) the percentage of the fund invested in sustainable investments with a social objective.

***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 impacts (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 issuers that are considered to have a 'Very Severe' controversy using controversy screens, covering

- environmental issues,
- human rights and communities,
- labour rights and supply chain,
- customers,
- 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.



**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.

*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) and 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.

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

☐ No

Consideration of the principal adverse impacts on sustainability factors of investment decisions (referred to as principal adverse impacts) is incorporated through a variety of tools, including:

(i) *Due Diligence* - analysis of whether impacts on sustainability factors are material and negative.

(ii) *ESG rating* - Fidelity references ESG ratings which incorporate consideration of material principal adverse impacts such as carbon emissions, employee safety and bribery and corruption, water management and, for sovereign issued securities, ratings used incorporate consideration of 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 the principal adverse impacts 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 and, in some circumstances, advocate for mitigating the principal adverse impacts. 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 for corporate issuers. Fidelity may also vote to help mitigate principal adverse impacts.

(vi) *Quarterly reviews* - monitoring of principal adverse impacts through the fund's quarterly review process.

Fidelity takes into account specific indicators for each sustainability factor when considering whether investments have a principal adverse impact. These indicators are subject to data availability and may evolve with improving data quality and availability. Information on principal adverse impacts will be available in the annual report of the fund.



## What investment strategy does this financial product follow?

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

A minimum of 50% of the fund's assets will be invested in securities with favourable ESG characteristics.

Favourable ESG characteristics are determined by reference to ESG ratings provided by external agencies and Fidelity ESG ratings.

Within this investment universe, the Investment Manager selects stocks through rigorous bottom-up financial analysis and valuation to select stocks with strong investment return potential.

In respect of its direct investments in corporate issuers, the fund is subject to:

1. a firm-wide exclusions list, which includes cluster munitions and anti-personnel landmines, and
2. 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.

The above exclusions and screens (the "Exclusions") may be updated from time to time. Please refer to the website for further information [Sustainable investing framework \(fidelityinternational.com\)](https://www.fidelityinternational.com/sustainable-investing-framework).

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 fund will invest:

- (i) a minimum of 50% of its assets in issuers with favourable ESG characteristics,
- (ii) a minimum of 10% in sustainable investments of which a minimum of 0% have an environmental objective (which is aligned with the EU Taxonomy), a minimum of 1% have an environmental objective (which is not aligned with the EU Taxonomy) and a minimum of 1% have a social objective.

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

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

This question is 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?***

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.



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

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

Taxonomy-aligned activities are expressed as a share of:

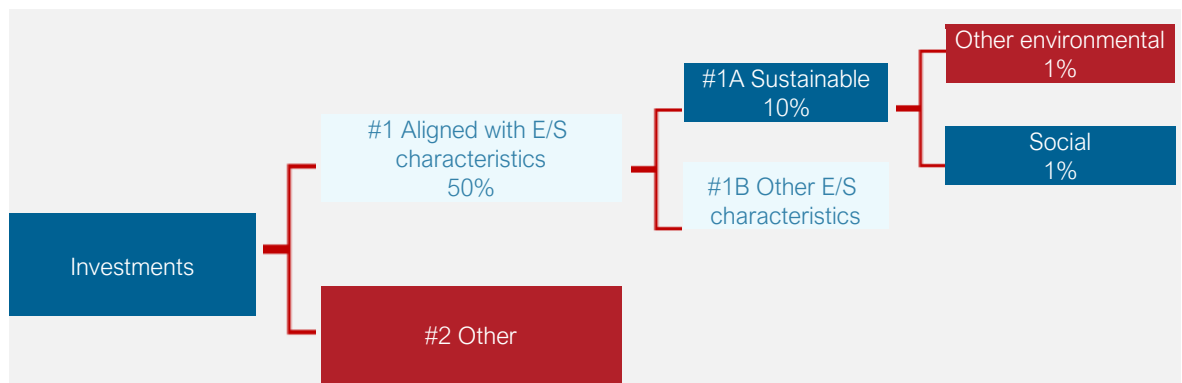
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities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

**(#1 Aligned with E/S characteristics)** The fund aims to invest:

- (i) A minimum of 50% of its assets in securities of issuers with favourable ESG characteristics,
- (ii) A minimum of 10% of its assets 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 1% have an environmental objective (which is not aligned with the EU Taxonomy) and a minimum of 1% have a social objective. The remaining sustainable investments of the fund may have an environmental or social objective.

**(#1B Other E/S characteristics)** Includes securities of issuers with favourable ESG characteristics but are not sustainable investments.

\*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.



**#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.

**#2 Other** 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.

### ***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 comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**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.



### 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.

The compliance of the investments of the fund with the EU Taxonomy will not be subject to an assurance by auditors or a review by third parties.

The EU Taxonomy alignment of the underlying investments of the fund is measured by turnover.

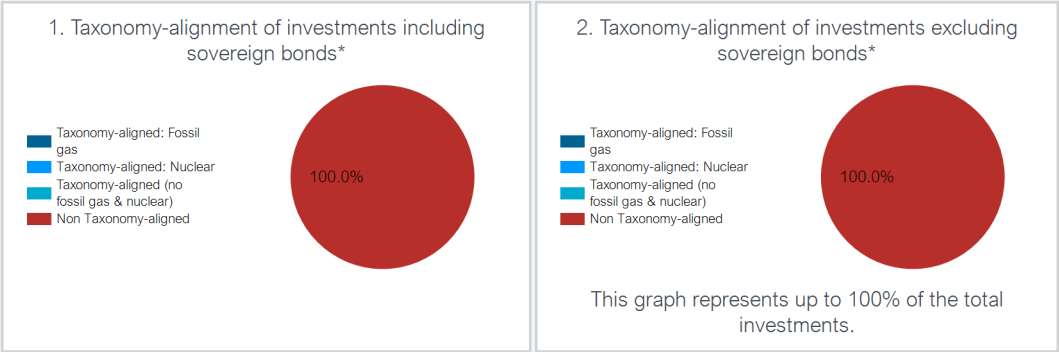
**Does the financial product invest in fossil gas and/or nuclear energy-related activities that comply with the EU Taxonomy<sup>1</sup>?**

☐ Yes

☐ In fossil gas
☐ In nuclear energy

☒ No

The two graphs below show in dark blue 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.



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



### 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 1% in sustainable investments with an environmental objective that is not aligned with the EU Taxonomy.

Investments could be aligned with the EU Taxonomy but the Investment Manager is not currently in a position to specify the exact proportion of the fund's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



### **What is the minimum share of socially sustainable investments?**

The fund invests a minimum of 1% 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 will be invested in assets aligned with the financial objective of the fund, 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.



### **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.

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



### **Where can I find more product specific information online?**

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

<https://www.fidelity.lu/funds/factsheet/LU1206943596/tab-disclosure#SFDR-disclosure>.

Further information on the methodologies set out herein is available on the website: [Sustainable investing framework \(fidelityinternational.com\)](https://www.fidelityinternational.com).



**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:**

FAST - Europe Fund

**Legal entity identifier:**

EM3YHO36N8LGDPC8RW22

**Environmental and/or social characteristics**

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

☒ ☒ ☐ **Yes**

☐ 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 will make a minimum of **sustainable investments with a social objective**: \_\_\_\_%

☒ ☐ ☒ **No**

☒ 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 15% 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 promotes E/S characteristics, **but will not make any sustainable investments**



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

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

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. ESG ratings consider environmental characteristics including carbon intensity, carbon emissions, energy efficiency, water and waste management and biodiversity, as well as social characteristics including product safety, supply chain, health and safety and human rights.

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) in respect of its direct investments in corporate issuers, the percentage of the fund invested in securities of issuers with exposure to the Exclusions (defined below);
- iii) the percentage of the fund invested in sustainable investments;
- iv) the percentage of the fund invested in sustainable investments with an environmental objective in economic activities (that do not qualify as environmentally sustainable under the EU Taxonomy); and
- v) the percentage of the fund invested in sustainable investments with a social objective.

***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 impacts (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 issuers that are considered to have a 'Very Severe' controversy using controversy screens, covering

- environmental issues,
- human rights and communities,
- labour rights and supply chain,
- customers,
- 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.

**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.

*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) and 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.

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

☐ No

Consideration of the principal adverse impacts on sustainability factors of investment decisions (referred to as principal adverse impacts) is incorporated through a variety of tools, including:

(i) *Due Diligence* - analysis of whether impacts on sustainability factors are material and negative.

(ii) *ESG rating* - Fidelity references ESG ratings which incorporate consideration of material principal adverse impacts such as carbon emissions, employee safety and bribery and corruption, water management and, for sovereign issued securities, ratings used incorporate consideration of 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 the principal adverse impacts 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 and, in some circumstances, advocate for mitigating the principal adverse impacts. 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 for corporate issuers. Fidelity may also vote to help mitigate principal adverse impacts.

(vi) *Quarterly reviews* - monitoring of principal adverse impacts through the fund's quarterly review process.

Fidelity takes into account specific indicators for each sustainability factor when considering whether investments have a principal adverse impact. These indicators are subject to data availability and may evolve with improving data quality and availability. Information on principal adverse impacts will be available in the annual report of the fund.



## What investment strategy does this financial product follow?

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

A minimum of 50% of the fund's assets will be invested in securities with favourable ESG characteristics.

Favourable ESG characteristics are determined by reference to ESG ratings provided by external agencies and Fidelity ESG ratings.

Within this investment universe, the Investment Manager selects stocks through rigorous bottom-up financial analysis and valuation to select stocks with strong investment return potential.

In respect of its direct investments in corporate issuers, the fund is subject to:

1. a firm-wide exclusions list, which includes cluster munitions and anti-personnel landmines, and
2. 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.

The above exclusions and screens (the "Exclusions") may be updated from time to time. Please refer to the website for further information [Sustainable investing framework \(fidelityinternational.com\)](https://www.fidelityinternational.com/sustainable-investing-framework).

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 fund will invest:

- (i) a minimum of 50% of its assets in issuers with favourable ESG characteristics,
- (ii) a minimum of 15% in sustainable investments of which a minimum of 0% have an environmental objective (which is aligned with the EU Taxonomy), a minimum of 5% have an environmental objective (which is not aligned with the EU Taxonomy) and a minimum of 5% have a social objective.

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

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

This question is 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?***

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.





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

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

Taxonomy-aligned activities are expressed as a share of:

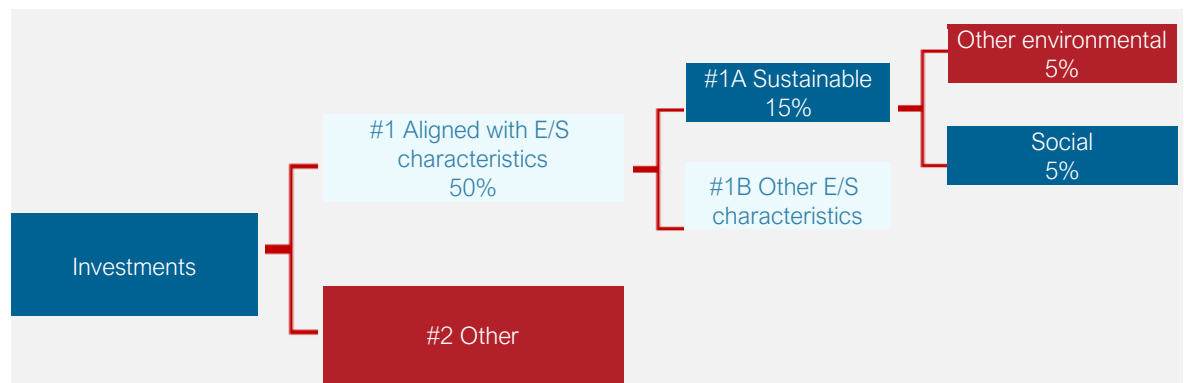
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities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

**(#1 Aligned with E/S characteristics)** The fund aims to invest:

- (i) A minimum of 50% of its assets in securities of issuers with favourable ESG characteristics,
- (ii) a minimum of 15% of its assets 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 5% have an environmental objective (which is not aligned with the EU Taxonomy) and a minimum of 5% have a social objective. The remaining sustainable investments of the fund may have an environmental or social objective.

**(#1B Other E/S characteristics)** Includes securities of issuers with favourable ESG characteristics but are not sustainable investments.

\*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.



**#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.

**#2 Other** 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.

### ***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 comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**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.



### 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.

The compliance of the investments of the fund with the EU Taxonomy will not be subject to an assurance by auditors or a review by third parties.

The EU Taxonomy alignment of the underlying investments of the fund is measured by turnover.

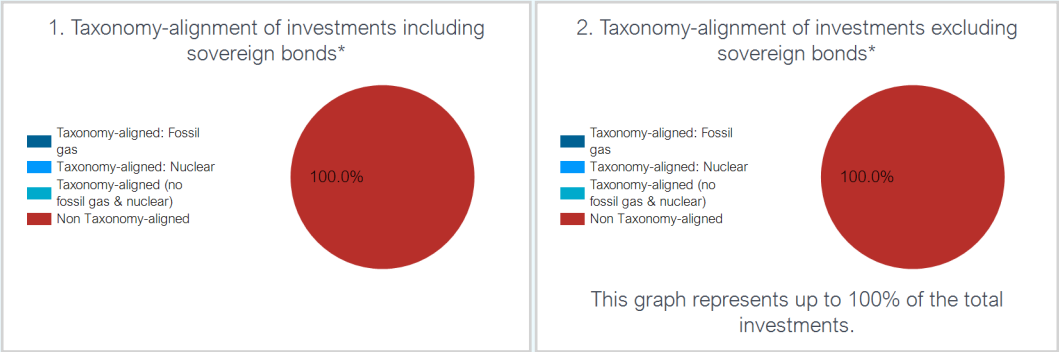
**Does the financial product invest in fossil gas and/or nuclear energy-related activities that comply with the EU Taxonomy<sup>1</sup>?**

☐ Yes

☐ In fossil gas
☐ In nuclear energy

☒ No

The two graphs below show in dark blue 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.



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



### 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 5% in sustainable investments with an environmental objective that is not aligned with the EU Taxonomy.

Investments could be aligned with the EU Taxonomy but the Investment Manager is not currently in a position to specify the exact proportion of the fund's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



### **What is the minimum share of socially sustainable investments?**

The fund invests a minimum of 5% 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 will be invested in assets aligned with the financial objective of the fund, 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.



### **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.

#### **Reference benchmarks**

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



### **Where can I find more product specific information online?**

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

<https://www.fidelity.lu/funds/factsheet/LU0202403266/tab-disclosure#SFDR-disclosure>.

Further information on the methodologies set out herein is available on the website: [Sustainable investing framework \(fidelityinternational.com\)](https://www.fidelityinternational.com).

**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:**

FAST - Global Multi Asset Selection 80 Fund

**Legal entity identifier:**

254900W0F3PZLD0CQB72

**Environmental and/or social characteristics**

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

☒ ☒ ☐ **Yes**

☐ 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 will make a minimum of **sustainable investments with a social objective:** \_\_\_\_%

☐ ☐ ☒ **No**

☐ 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 promotes E/S characteristics, **but will not make any sustainable investments**



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

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

The fund promotes environmental and social characteristics by investing in securities of issuers with favourable ESG characteristics or in UCITS and UCIs which either promote environmental and social characteristics or have a sustainable investment objective.

Favourable ESG characteristics are determined by reference to ESG ratings. ESG ratings consider environmental characteristics including carbon intensity, carbon emissions, energy efficiency, water and waste management and biodiversity, as well as social characteristics including product safety, supply chain, health and safety and human rights. When investing in UCITS or UCIs managed by third parties, the fund relies on ESG methodology and exclusion policies used by third-party asset managers and index providers as well as their engagement and voting policies and practices.

The fund is actively managed and is not managed with reference to a benchmark.

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 investments of the fund invested in securities of issuers with favourable ESG characteristics in accordance with Fidelity's Sustainable Investing Framework; and
- ii) the percentage of the investments of the fund invested in UCITS or UCIs which either promote environmental/social characteristics or have a sustainable investment objective.

***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?***

This question is not applicable as the fund does not intend to make sustainable investments.

***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?***

This question is not applicable as the fund does not intend to make sustainable investments.

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

This question is not applicable.

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

This question is not applicable.

**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

☐ No

Consideration of the principal adverse impacts on sustainability factors of investment decisions (referred to as principal adverse impacts) is incorporated through a variety of tools, including:

- (i) *Due Diligence* - analysis of whether impacts on sustainability factors are material and negative.
- (ii) *ESG rating* - Fidelity references ESG ratings which incorporate consideration of material

principal adverse impacts such as carbon emissions, employee safety and bribery and corruption, water management and, for sovereign issued securities, ratings used incorporate consideration of 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 the principal adverse impacts 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 and, in some circumstances, advocate for mitigating the principal adverse impacts. 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 for corporate issuers. Fidelity may also vote to help mitigate principal adverse impacts.

(vi) *Investments in UCITS and UCIs* - Fidelity references its Multi-Asset Manager ESG Ratings to determine and assess if certain UCITS or UCIs (managed by third party asset managers) are considering principal adverse impacts on sustainability factors. The fund will rely on the consideration of principal adverse impacts on sustainability factors carried out by these UCITS or UCIs. For other UCITS or UCIs, including passively managed UCITS and UCIs, Fidelity considers principal adverse impacts on sustainability factors by assessing underlying holdings, when this data is made available.

(vii) *Quarterly reviews* - monitoring of principal adverse impacts through the fund's quarterly review process.

Fidelity takes into account specific indicators for each sustainability factor when considering whether investments have a principal adverse impact. These indicators are subject to data availability and may evolve with improving data quality and availability.

Information on principal adverse impacts will be available in the annual report of the fund.





## What investment strategy does this financial product follow?

### The investment strategy

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

Fidelity's Multi Asset Research team aim to understand an individual manager's approach to ESG by evaluating how far ESG considerations are integrated within the investment process and philosophy, the analyst's financial analysis and the composition of the portfolio. They consider how ESG factors are integrated into the investment policy of the strategy, and, where Fidelity ESG ratings are used, how ESG research and output is evidenced in individual security weights and any applicable engagement and exclusion policies. The team consults a range of data sources, including Fidelity ESG ratings as well as third-party data, in order to assess the ESG metrics of the relevant strategies.

The fund invests at least 50% of its assets in securities of issuers with favourable environmental, social and governance (ESG) characteristics or in UCITS and UCIs which either promote environmental/social characteristics or have a sustainable investment objective.

Favourable ESG characteristics are determined by reference to ESG ratings provided by external agencies and Fidelity ESG ratings.

At the start of the fund lifecycle, the fund will allocate investments to UCITS, and UCIs invested in money market instruments and debt securities. Over the three years after the initial subscription period the allocation of the fund's exposure to equity will gradually increase to approximately 80% (and in any event no less than 50% nor more than 100%) of its assets and will be actively managed in this range for the remainder of the fund's lifecycle.

As the fund increases equity exposure, the fund aims to invest in a variety of global equity strategies, which may include long-term market themes, sector exposure, regional, global and/or style specific strategies.

In respect of its direct investments in corporate issuers, the fund is subject to:

1. a firm-wide exclusions list, which includes cluster munitions and anti-personnel landmines, and
2. 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. UCITS and UCIs managed by Fidelity that the fund may invest in, also apply these exclusions in respect of direct investments in corporate issuers.

The above exclusions and screens (the "Exclusions") may be updated from time to time. Please refer to the website for further information [Sustainable investing framework \(fidelityinternational.com\)](https://www.fidelityinternational.com/sustainable-investing-framework).

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

UCITS and UCIs managed by a third-party asset manager will be subject to broadly equivalent exclusions to those outlined above. A maximum of 10% of the assets of the fund may be invested in passively managed UCITS or UCIs with exposure to market capitalisation weighted indices for which exclusions are not applied.

***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 fund invests directly or indirectly a minimum of 50% of its assets in securities of issuers, with favourable environmental, social and governance (ESG) characteristics and/or in UCITS and/or UCIs which either promote environmental and social characteristics or have a sustainable investment objective.

In addition, the fund will systematically apply the Exclusions to direct investments in corporate issuers as described above.

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

This question is not applicable.

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

The governance practices of investee companies are assessed using fundamental research, including Fidelity ESG ratings and 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. For sovereign issuers, factors such as corruption and freedom of expression are included.

When investing in third party UCITS/UCIs, Fidelity relies on third-party asset managers and index providers to assess good governance practices. In addition, Fidelity will monitor the governance characteristics of underlying investee companies, when holdings data is made available.

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



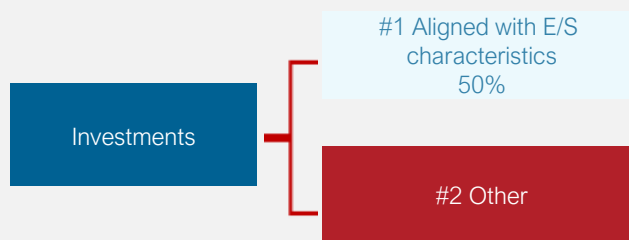
## What is the asset allocation planned for this financial product?

**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.

**(#1 Aligned with E/S characteristics)** The fund invests a minimum of 50% of its assets in securities of issuers, with favourable environmental, social and governance (ESG) characteristics and in UCITS or UCIs which either promote environmental and social characteristics or have a sustainable investment objective.



**#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.

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

### ***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 comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**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.



## **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.

The compliance of the investments of the fund with the EU Taxonomy will not be subject to an assurance by auditors or a review by third parties.

The EU Taxonomy alignment of the underlying investments of the fund is measured by turnover.

### ***Does the financial product invest in fossil gas and/or nuclear energy-related activities that comply with the EU Taxonomy<sup>1</sup>?***

☐ Yes

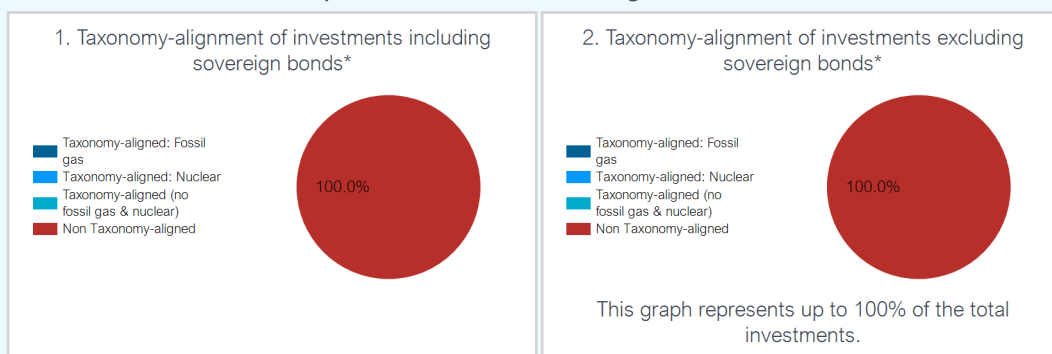
☐ In fossil gas

☐ In nuclear energy

☒ No

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The two graphs below show in dark blue 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.



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



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

This question is not applicable as the fund does not intend to make sustainable investments.



### What is the minimum share of socially sustainable investments?

This question is not applicable as the fund does not intend to make sustainable investments.



### 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 will be invested in assets aligned with the financial objective of the fund, 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.



### 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.

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

***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:

[https://www.fidelity.lu/funds/factsheet/LU2671724479/tab-disclosure#SFDR-disclosure.](https://www.fidelity.lu/funds/factsheet/LU2671724479/tab-disclosure#SFDR-disclosure)

Further information on the methodologies set out herein is available on the website: [Sustainable investing framework \(fidelityinternational.com\)](https://www.fidelityinternational.com).

**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:**

FAST - Global Multi Asset Thematic 60 Fund

**Legal entity identifier:**

254900D3LAXC7H3R5X60

**Environmental and/or social characteristics**

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

☒ ☒ ☐ **Yes**

☐ 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 will make a minimum of **sustainable investments with a social objective:** \_\_\_\_%

☒ ☐ ☒ **No**

☐ 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 promotes E/S characteristics, **but will not make any sustainable investments**



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

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

The fund promotes environmental and social characteristics by investing directly or indirectly in securities of issuers with favourable ESG characteristics and/or in UCITS and/or UCIs which either promote environmental/social characteristics or have a sustainable investment objective. Favourable ESG characteristics are determined by reference to ESG ratings. ESG ratings consider environmental characteristics including carbon intensity, carbon emissions, energy efficiency, water and waste management and biodiversity, as well as social characteristics including product safety, supply chain, health and safety and human rights.

The fund is actively managed and is not managed with reference to a benchmark.

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 investments of the fund invested in securities of issuers with favourable ESG characteristics in accordance with Fidelity's Sustainable Investing Framework; and
- ii) the percentage of the investments of the fund invested in UCITS or UCIs which either promote environmental/social characteristics or have a sustainable investment objective.

***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?***

This question is not applicable as the fund does not intend to make sustainable investments.

***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?***

This question is not applicable as the fund does not intend to make sustainable investments.

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

This question is not applicable.

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

This question is not applicable.

**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
- ☐ No

Consideration of the principal adverse impacts on sustainability factors of investment decisions (referred to as principal adverse impacts) is incorporated through a variety of tools, including:

- (i) *Due Diligence* - analysis of whether impacts on sustainability factors are material and negative.
- (ii) *ESG rating* - Fidelity references ESG ratings which incorporate consideration of material

principal adverse impacts such as carbon emissions, employee safety and bribery and corruption, water management and, for sovereign issued securities, ratings used incorporate consideration of 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 the principal adverse impacts 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 and, in some circumstances, advocate for mitigating the principal adverse impacts. 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 for corporate issuers. Fidelity may also vote to help mitigate principal adverse impacts.

(vi) *Quarterly reviews* - monitoring of principal adverse impacts through the fund's quarterly review process.

Fidelity takes into account specific indicators for each sustainability factor when considering whether investments have a principal adverse impact. These indicators are subject to data availability and may evolve with improving data quality and availability. Information on principal adverse impacts will be available in the annual report of the fund.



## What investment strategy does this financial product follow?

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

Fidelity's Multi Asset Research team aim to understand an individual manager's approach to ESG by evaluating how far ESG considerations are integrated within the investment process and philosophy, the analyst's financial analysis and the composition of the portfolio. They consider how ESG factors are integrated into the investment policy of the strategy, and, where proprietary ratings are used, how ESG research and output is evidenced in individual security weights and any applicable engagement and exclusion policies. The team consults a range of data sources, including Fidelity ESG ratings as well as third-party data, in order to assess the ESG metrics of the relevant strategies.

The fund invests directly or indirectly at least 50% of its assets in securities of issuers with favourable environmental, social and governance (ESG) characteristics and/or in UCITS and/or UCIs which either promote environmental/social characteristics or have a sustainable investment objective.

Favourable ESG characteristics are determined by reference to ESG ratings provided by external agencies and Fidelity ESG ratings.

As the fund increases equity exposure, the fund aims to invest in a variety of long-term market themes that may benefit from structural changes in economic, social and environmental factors, such as disruptive technologies, demographics and climate change. Disruptive technologies are innovations that meaningfully change consumer, industry or company behaviour. Demographic trends include those related to an ageing population, healthcare and retirement, growth of the middle class, consumption, financial services, urbanization, and population growth resources, productivity and automation.

In respect of its direct investments in corporate issuers, the fund is subject to:

1. a firm-wide exclusions list, which includes cluster munitions and anti-personnel landmines, and
2. 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.

The above exclusions and screens (the "Exclusions") may be updated from time to time. Please refer to the website for further information [Sustainable investing framework \(fidelityinternational.com\)](https://www.fidelityinternational.com/sustainable-investing-framework).

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 fund invests directly or indirectly a minimum of 50% of its assets in securities of issuers, with favourable environmental, social and governance (ESG) characteristics and/or in UCITS and/or UCIs which either promote environmental and social characteristics or have a sustainable investment objective.

In addition, the fund will systematically apply the Exclusions to direct investments in corporate issuers as described above.

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

This question is 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?**

The governance practices of investee companies are assessed using fundamental research, including Fidelity ESG ratings and 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. For sovereign issuers, factors such as corruption and freedom of expression are included.



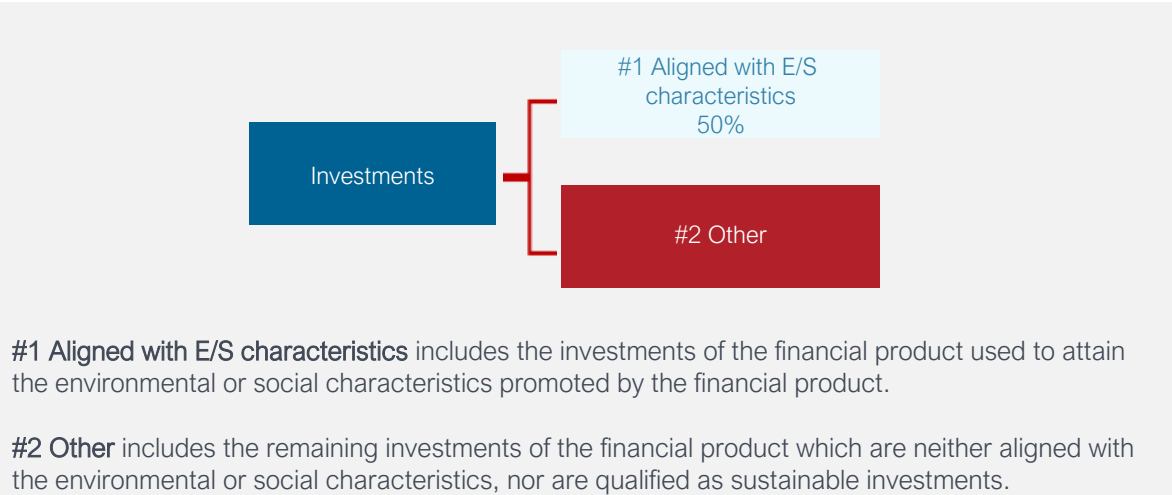
**What is the asset allocation planned for this financial product?**

**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.

**(#1 Aligned with E/S characteristics)** The fund invests directly or indirectly a minimum of 50% of its assets in securities of issuers, with favourable environmental, social and governance (ESG) characteristics and/or in UCITS and/or UCIs which either promote environmental and social characteristics or have a sustainable investment objective.



**#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.

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

**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.

The compliance of the investments of the fund with the EU Taxonomy will not be subject to an assurance by auditors or a review by third parties.

The EU Taxonomy alignment of the underlying investments of the fund is measured by turnover.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

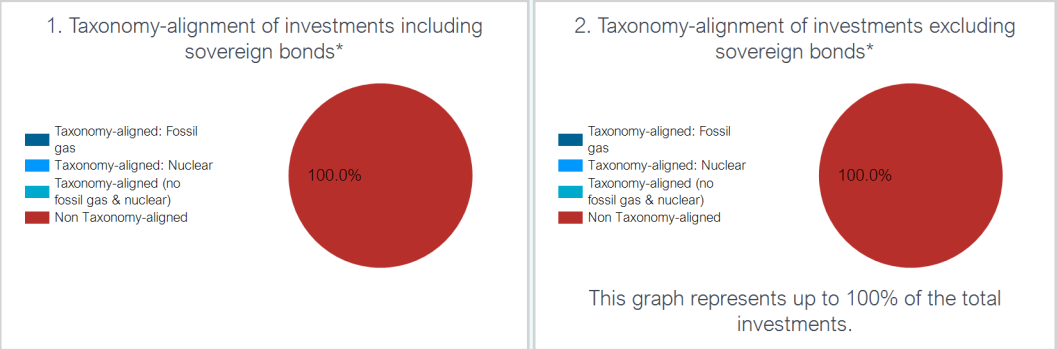
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

**Does the financial product invest in fossil gas and/or nuclear energy-related activities that comply with the EU Taxonomy<sup>1</sup>?**

- ☐ Yes

☐ In fossil gas
☐ In nuclear energy
- ☒ No

The two graphs below show in dark blue 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.

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



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

This question is not applicable as the fund does not intend to make sustainable investments.



**What is the minimum share of socially sustainable investments?**

This question is not applicable as the fund does not intend to make sustainable investments.



**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 will be invested in assets aligned with the financial objective of the fund, 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.



**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.

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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

*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:  
<https://www.fidelity.lu/funds/factsheet/LU2547707526/tab-disclosure#SFDR-disclosure>.

Further information on the methodologies set out herein is available on the website: [Sustainable investing framework \(fidelityinternational.com\)](https://www.fidelityinternational.com).